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August 11, 2008

Angela Freudenstein
Washington State Department of Transportation (WSDOT)
Alaskan Way Viaduct and Seawall Replacement Program Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: Comments on the NEPA Environmental Assessment and SEPA
Determination of Nonsignificance / Notice of Adoption for the
SR-99 S. Holgate Street to S. King Street Viaduct Replacement Project

Dear Ms. Freudenstein:

The Washington State Major League Baseball Stadium Public Facilities District (PFD) appreciates the opportunity to continue to review and comment on the SR 99 Alaskan Way Viaduct Replacement project. This comment letter addresses the S. Holgate Street to S. King Street portion of the project (Viaduct south end project), including the NEPA Environmental Assessment and the SEPA determination of nonsignificance (DNS).

The PFD is the public entity that developed and 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. Safeco Field is located just to the east of the Alaskan Way Viaduct south end project and it will be directly affected by the proposed construction activities, including road closures and detours.

The PFD continues to be concerned that project construction could have significant adverse impacts on our facility and our tenant the Seattle Mariners, if appropriate mitigation measures are not implemented. While the EA identifies project impacts and potential mitigation measures, we note that significant elements of the project continue to change and evolve, including the linkage to the central waterfront portion of the Viaduct project. These changes to the proposal will likely result in additional mitigation measures being required. The PFD wants to continue to be consulted on these project changes, and we want to be involved with the design and implementation of appropriate mitigation measures. Absent such involvement and mitigation, the PFD is concerned that project impacts will be significant and an EIS will be required.

B-004-001

We appreciate and understand your concern with this project and are committed to working with the PFD and the Mariners as the project proceeds and throughout the construction process. The EA analyzes the proposed improvements in sufficient detail to determine whether, with avoidance, minimization, and mitigation, there will be significant adverse impacts. Our conclusion is that there will not, but further planning and design work remain to be done. The EA states (see pages 103 and 172) that a detailed traffic management plan will be developed in coordination with the two sports venues. In summary, the EA provides the level of analysis appropriate for this stage of decision making and with this FONSI establishes the necessary commitments for the project to move ahead. We are committed and look forward to working with PFD staff to develop a construction approach that meets everyone's needs.

B-004-001

B-004-002 | The PFD commented in October 2007 on the scope of the environmental assessment (EA), and we are pleased to see that many of our comments have been addressed. The EA appropriately evaluates the impact of the project on key elements of the environment, it provides a detailed history of the evaluation of alternatives leading to the current design, and the cumulative impacts of the Viaduct south end project and other area projects are separately evaluated.

The PFD supports the transportation and infrastructure improvements that the Alaskan Way Viaduct project will provide, and in particular we support the additional northbound and southbound access points in the area of South King Street. The PFD believes that the project can be constructed with appropriate mitigation measures that minimize significant impacts on Safeco Field, the Seattle Mariners, baseball fans, and other facility users. But there are a number of areas where we continue to have concerns. If these elements are not appropriately addressed, the impacts of the Viaduct south end project could be significant and an environmental impact statement would be required:

B-004-003 |

- **Project Changes:** As we noted, some elements of the project may continue to evolve as the project design proceeds and as the central waterfront portion of SR 99 is finalized. We understand that the Port of Seattle and others have concerns with the functionality of the Alaskan Way/Atlantic Street/Colorado Avenue intersection, and that design changes may be made to reduce traffic signal cycles and intersection delays. While the PFD supports changes that improve project operations, we would like the opportunity to review and comment on any future project changes and additional mitigation measures to ensure that they do not have significant adverse impacts on Safeco Field.

B-004-004 |

- **Traffic and Transportation:** The PFD remains concerned about the traffic and transportation impacts that the construction of the Viaduct south end project will have on access to and from the ballpark. We acknowledge the considerable work that has been done by the project team to identify construction impacts and potential mitigation measures for the various project stages. Nonetheless, minimizing construction impacts requires close and careful coordination between WSDOT and all of the other parties with an interest in this area. While the EA identifies some coordination measures (see, e.g., sections 8 and 14 of Appendix B), these measures are quite general and, sometimes, optional (see, e.g., p. 173: "consider establishing an oversight committee. . ."). In order to avoid significant adverse transportation impacts, the PFD believes that traffic and transportation coordination should be a mandatory element of the project mitigation, and that the PFD, the Seattle Mariners and other stakeholders must be directly involved.

The PFD and the Mariners were quite successful in working directly with WSDOT on mitigating the construction impacts of the SR 519 phase 1 project, and we look forward to similar coordination on the Viaduct south end project. Such coordination involves written agreements establishing the parameters and timing for the construction work, on-going regular meetings, both before and during construction, and specific mitigation commitments. For example, the mitigation measures in the EA expressly provide for BNSF and Union Pacific Railroad involvement in certain activities (see, e.g., p. 81: "Any

B-004-002

Thank you for your support and continued coordination as the project moves forward. Attachment 4 of this FONSI contains the mitigation commitment list.

B-004-003

Per your request, project staff have met with PFD staff and Mariners staff to discuss changes to the S. Atlantic Street intersection, construction mitigation, and further construction planning. Your comments have been helpful, and we look forward to your participation throughout the construction planning process.

B-004-004

WSDOT is committed to engaging key businesses, agencies, and activity centers (sports and event facilities and the port terminals) in the south end as they refine the current construction staging plan. Thorough planning will lessen the impacts of construction on traffic, parking, access, and mobility in the project area and surrounding neighborhoods. By understanding access and mobility needs in the project area, WSDOT will be able to develop a construction approach that avoids and minimizes temporary disruptions. These specific needs will be incorporated into the staging plan where possible and advisable to help ensure that traffic flows smoothly during construction. WSDOT will maintain communication during construction to monitor the effectiveness of the staging plan and to make reasonable adjustments where necessary.

Consistent with measures described in the EA (see pages 103 and 172) and your comment, we have convened a group of stakeholders, including the Mariners, to help develop the traffic management plan for construction of this project. We appreciate your willingness to participate and look forward to a productive, collaborative relationship.

B-004-004

[track] closures would be coordinated with [the railroads]”). The PFD asks that it and other stakeholders be directly involved in the decision making on traffic and transportation issues that affect Safeco Field.

For example, we believe that a coordination committee should be established for the Viaduct south end project, similar to the “Maintenance of Traffic Task Force” that is being implemented for the SR 519 phase 2 project. Such a committee would provide a meaningful opportunity for reducing project impacts, and we urge that it be included as a required mitigation measure in the record of decision on the project. While the EA describes a “Downtown Transportation Operations Committee” (EA, p. 103), the focus of that committee may be too broad and too diffuse to address issues that are specific to the operations around the stadium area. In any event, the PFD wants to ensure that the PFD and the Mariners will be consulted and made a part of the on-going mitigation planning and implementation process for this project.

B-004-005

Lane Closures and Detours: The EA notes that traffic will be restricted and detoured at times during project construction (EA, p. 80, Question No. 3). The PFD agrees with the priorities established by WSDOT to “maintain traffic capacity on SR 99 as much as practical,” to “minimize effects to First Avenue S.,” and to “maintain access to and from area businesses and the stadiums” (EA, p. 80). The PFD is concerned, however, with the blanket statement later in this section that full closures of SR 99 would occur “only during nights and weekends.” Obviously, such closures could have a tremendous impact on ballpark operations if scheduled to occur concurrent with baseball games or other large events. All construction activities, and in particular lane or roadway closures, should be coordinated with events scheduled at Safeco Field.

The PFD believes that the impact of lane closures and associated detours on Safeco Field could be significant, absent appropriate mitigation. The development of an adequate traffic control management plan (TMP) is essential to ensuring that these potentially significant impacts are mitigated. While development of a TMP is identified as a potential mitigation measure and the PFD is identified as a participant in the TMP development process (see, EA, p. 96), we want to ensure that we will be consulted and included in the discussion of all project lane closures and detours affecting Safeco Field. While there are literally hundreds of events scheduled at Safeco Field every year, there are also times when construction and road closures could occur with very little disruption to Safeco Field operations. The PFD wants to ensure that it can participate in the decision making process in order to minimize impacts to our facility. Again, without such participation, the PFD believes that the impacts on Safeco Field could be significant and an environmental impact statement should be required.

B-004-005

The project team looks forward to coordination with the PFD. WSDOT is committed to engaging key businesses, agencies, and activity centers (sports and event facilities and the port terminals) in the south end as they refine the current construction staging plan. Thorough planning will lessen the impacts of construction on traffic, parking, access, and mobility in the project area and surrounding neighborhoods. By understanding access and mobility needs in the project area, WSDOT will be able to develop a construction approach that avoids and minimizes temporary disruptions. These specific needs will be incorporated into the staging plan where possible and advisable to help ensure that traffic flows smoothly during construction. WSDOT will maintain communication during construction to monitor the effectiveness of the staging plan and to make reasonable adjustments where necessary.

B-004-006

- **Parking Loss:** Temporary and permanent loss of parking is discussed in the EA, but the impacts of this loss may be understated. The PFD believes that these losses could be significant and that mitigation for these losses should be addressed in the TMP. In particular, construction worker parking could contribute further to the loss of area-wide parking, if special provisions for such parking are not made.

B-004-007

Finally, we note 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 to enjoy events, both large and small. The PFD understands that facility access may be affected during construction of the Viaduct south end 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 so that no environmental impact statement is required.

Again, we appreciate the opportunity to comment. We look forward to seeing this project proceed and to seeing all of the mitigation measures identified in the EA implemented. We look forward to working with WSDOT and the consultant team on this important project. If you have any questions, please give our Executive Director, Kevin Callan, a call at (206) 664-3076 or (206) 767-7800.

Sincerely yours,

WASHINGTON STATE MAJOR LEAGUE BASEBALL STADIUM PUBLIC FACILITIES DISTRICT



Robert C. Wallace, Board Chair

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

B-004-006

The use of any on-street parking spaces by construction workers would have to be coordinated and approved by the City. WSDOT is considering restricting construction workers from using parking spaces that could otherwise be used by event attendees or by customers of local businesses. Additional strategies for construction worker parking will be coordinated with local stakeholders.

B-004-007

Responses to the Seattle Mariners letter can be found in item B-003. WSDOT will continue to coordinate with the PFD and is committed to engaging key businesses, agencies, and activity centers (sports and event facilities and the port terminals) in the south end as they refine the current construction staging plan.