



VIA MESSENGER

August 11, 2008

Angela Freudenstein  
Washington State Department of Transportation  
Holgate to King Street Viaduct Replacement Project  
999 Third Avenue, Suite 2424  
Seattle, Washington 98104

RE: Comments on the Environmental Assessment and Determination of  
Nonsignificance for the SR99 S. Holgate to S. King Street Viaduct Replacement  
Project

Dear Ms. Freudenstein:

**B-003-001** The Mariners have significant concern about the accuracy and completeness of the Environmental Assessment. It fails to address impacts on the area's regional event facilities, Safeco Field and Qwest Field and Event Center. In our letter on the scope of the Environmental Assessment, dated October 12, 2007, we commented on the need for a more complete analysis of the cumulative impacts of the multiple projects that will be under concurrent construction. We asked for a complete analysis of the proposed mitigation measures and how they would perform, specifically during event-related traffic periods. At the time of the scoping process, the design of the proposed interchange at SR 99 and S. Atlantic Street was vastly different than the design currently under consideration, and we expressed concern and the need for better analysis of how the design would impact access to the regional event facilities. We do not believe that those concerns have been adequately addressed in the EA.

**B-003-002** With the design of the project still undergoing substantial change there is reason to believe that the impacts of the project will also change both during construction and afterward. Completion of the environmental assessment process so far in advance of an accepted project design seems to strain the environmental review process and begs for dispute. While the needs of freight traffic appear to have been thoroughly addressed, the failure to adequately address the needs of the adjacent regional event facilities at Safeco Field, and Qwest Field and Event Center is puzzling. These facilities directly generate hundreds of millions of dollars in revenue, and draw approximately four million people into the area each year. Thousands of working people rely on jobs at the stadiums, at



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**B-003-001**

We appreciate and understand your concern with this project and are committed to working with 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 be significant effects. The EA clearly states (see pages 103 and 172) that a detailed traffic management plan will be developed in coordination with the two sports venues, including the Mariners. Project staff have met with staff from the Mariners several times to discuss the project and keep your organization up to date. 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 Mariners staff to develop a construction approach that meets everyone's needs.

**B-003-002**

Beyond the changes described in this FONSI, the design of the project is not expected to change in a manner that would substantially alter the conclusions stated in the EA. It should be noted that these changes improve project performance and reduce its impacts. When in operation, the proposed improvements will benefit patrons of the sports facilities and event center with better access and improved traffic flow. Construction impacts during special events (temporary increases over the already congested baseline conditions) are clearly identified in the EA and will be reduced through the traffic management plan that will be developed in coordination with the Mariners and managers of the other nearby facilities.

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

**B-003-002** | businesses supplying the stadiums, or at businesses benefiting from their proximity to the stadiums, to earn a living. This must not be ignored. The failure of the environmental assessment process to give adequate consideration to the existence of stadium-related traffic, or to fully analyze stadium traffic and parking requirements, does a disservice not only to the public who benefit from the stadiums but also the freight interests who will suffer from a lack of thorough planning.

**B-003-003** | The loss of parking is mentioned in the assessment as if being only a nominal, inconsequential issue. The loss of over 1200 spaces represents about eight percent of the parking inventory that has historically supported Safeco Field. While this may seem inconsequential, a thorough analysis would reveal that the additional losses due to other concurrent public and private projects will result in a cumulative impact that is much greater, and which will result in the displacement of many more vehicles than accounted for in the document. There is almost no discussion about the 14,000 cars that come into the area for baseball games, or the 20,000 cars that come in for football games, and how those vehicles will especially impact the PM peak commute period. There is very little accounting for the new soccer team events nor any of the major non-athletic events such as concerts, meetings, and trade shows, which routinely bring hundreds or thousands of vehicles into the area. There is a mis-characterization of the event facility parking inventory as "pay lot" parking which has been stated as being only 37% used. The parking inventory of the event facilities (Safeco Field Garage, Qwest Event Center Garage and North Lot), totals 4500 spaces. That inventory is not available to the general public before or during events and should be more appropriately included with more restricted private parking category, thereby reducing the amount of "unused" parking normally available to the general public by two-thirds, a considerable reduction in supply.

Failing to fully study these issues and design an adequate program of mitigation will not make them go away, and will contribute to a less-than-promised outcome for the public.

**B-003-004** | Finally, the project must understand and accept that events at these regional event facilities are not "special events" but are regularly occurring activities at facilities specifically designed for, and permitted as, permanent, major, regional event facilities. As such the transportation and access needs of these facilities must be given adequate and equitable standing as given other business segments existing in this area.

**Other Issues Needing Consideration:**

**B-003-005** | Page 59, needs a small technical correction to the second paragraph which refers to "views to the northeast" which should state "northwest".

**B-003-006** | Page 60, the statement about the Jack Perry Waterfront access does not coincide with the drawing on page 54. In that drawing the Jack Perry Waterfront access point is moved substantially south. The current access gives access to the waters edge. There does not

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-003-003**

WSDOT, FHWA, and the City of Seattle do not have a standing policy for replacing off-street parking. The EA notes that the occupancy rate of 37 percent is during non-event days. The high vacancy rate indicates relatively little demand from the general public for the event parking facilities on non-event days. Even if these facilities are not available for general parking on event days, it would not change our conclusion. The project team recognizes that there would be a reduction in the parking supply during events and that currently parking can be difficult to find and/or expensive during events. Past experience has shown that market forces will likely prompt more off-street parking to be made available in the area. Overall, the incremental loss of parking due to this project is not expected to have a significant impact on future operations of the event facilities.

The project team looks forward to continued coordination with the Seattle Mariners, Seattle Seahawks, Washington State Major League Baseball Stadium Public Facilities District, and Washington State Public Stadium Authority on issues, including parking and event traffic.

**B-003-004**

While events at Safeco Field, Qwest Field, and the Qwest Field Event

- B-003-006** appear to be the same level of access at the new location – no ability to get to the water’s edge and far enough down the waterway to eliminate the view of Elliott Bay at the viewpoint. This is a significant change to what is supposed to be a public access and viewpoint.
- B-003-007** Page 61, the first paragraph states there would be no adverse impacts on recreational facilities by the project. This is disputed – the closure of access from Royal Brougham Way to Alaskan Way is significant to the functioning of Safeco Field. The sphere of influence of the regional event facilities cannot be confined to the physical premises of those facilities alone. In the case of Safeco Field, permitting was based upon studies of available parking within a 6000 foot distance to justify the stadium parking requirements. The project will eliminate between 1200 and 1600 of the currently available parking spaces, which have historically supported the ballpark parking need for 14,400 spaces (8-12% of the total needed). This constitutes a significant adverse impact on Safeco Field.
- B-003-008** Page 81, staging timeline comments and traffic reroutes and detours fail to acknowledge existing street closures before, during and after major events at Safeco and at Qwest for pedestrian safety. Planning for rerouting traffic onto Royal Brougham and Atlantic without taking into consideration the availability of those streets during major events, does not adequately address the problem.
- B-003-009** Page 111, the impacts on Safeco Field as a business and a large employer cannot be underestimated and must be included. The narrow perimeter of only “one block” established as the impacted zone is inaccurate. Safeco Field, as a regional event facility, impacts and is impacted by a vastly greater zone. During development of the ballpark that zone was defined by the City of Seattle as a 6000 foot radius. As such, the ballpark should be identified as an impacted business.
- B-003-010** Page 114, while the statement is made that event goers will be encouraged to use bus and rail to major events, it is evident that there is no understanding of what services are available or the restrictions on those services that make them unavailable for the majority of events at the regional event facilities. With the recent, ill-founded FTA ruling on “charter bus” services, the practice of supporting enhanced transit services to mitigate traffic impacts is no longer available and can no longer be suggested as a means of reducing congestion. The limit of the capacity of Metro service to handle event loads on its regular routes needs to be better understood. It also appears in the document that there is a lack of understanding of the limitations placed on the use of heavy rail as a form of transportation to major events, and a misunderstanding of the limited accessibility of the LINK light rail system due to the lack of parking near the LINK stations.
- B-003-011** Page 115, the Environmental Assessment erroneously characterizes events in Safeco Field and Qwest Field and Event Center as “special events”. These facilities are permanently permitted, full-time event locations no different than the Washington State

Center are fully permitted, they do not occur with the same frequency or at the same time as normal working hours. We use the term "special events" to indicate that these events and the resulting traffic flows do not follow the same patterns as the majority of typical workday activities.

**B-003-005**

In Attachment 1, Errata to the EA and Discipline Reports, the sentence has been revised to state "views to the northwest."

**B-003-006**

The text on page 60 in the EA was describing how southbound Alaskan Way would be reconfigured, changing how vehicles traveling in that direction would access Jack Perry Memorial Viewpoint. Access to the viewpoint near S. Massachusetts Street will not be affected. Southbound traffic will be able to turn right into Pier 36 as they do today. The existing turn pocket at S. Massachusetts Street would allow northbound traffic to turn left into Pier 36 to access the shoreline viewpoint. Since the EA was published, changes have been made to southbound Alaskan Way. The paragraph on page 60 has been revised. Text revisions are included in Attachment 1, Errata to the EA and Discipline Reports. Exhibit 3-1, the Proposed Build Alternative, has been updated and is also shown in Attachment 1.

**B-003-007**

With the improvements to S. Atlantic Street and the added frontage roads and ramps, closing S. Royal Brougham Way to Alaskan Way S. will have no effect on the functioning of Safeco Field. With regard to parking, the EA clearly describes reductions to parking in the area that will result from the project. There have been other changes in parking supply, both increases and decreases, since Safeco Field was permitted, and it is inevitable that there will be more changes in the future. Parking for major events at Safeco or Qwest Fields is and will be in high demand

- B-003-011** | Convention and Trade Center. Major events occur at these facilities over 150 days each year, and concurrent multiple smaller events occur every day. The events that occur at these facilities every day are not part of the special event permitting process within the city. The Environmental Assessment must not characterize these facilities as anything other than permanent, major, regional event facilities and must recognize the access needs of these publicly owned facilities.
- B-003-012** | Page 114, the Mariners will strongly oppose setting aside street parking for project construction workers, or the further reduction in available parking within the area of Safeco Field for use by project construction workers.
- B-003-013** | Page 115, advance notice of utility disruptions, while admirable, would hardly suffice as mitigation for some businesses, especially restaurants, cold storage facilities or data processing and storage facilities. Provisions for alternate power sources, whether temporary feeds or generators for power disruptions, would be a vastly less costly solution than would be claims against the project for lost inventories or lost business.
- B-003-014** | Page 121, the potential impacts on police and fire cannot be underestimated. Again, the Environmental Assessment badly understates the impacts of the project in the area near the stadiums during major events. It must be noted that police staffing for events at Safeco Field will only address traffic control needs comparable to what existed prior to the project.
- B-003-015** | Page 125, the plan to divert traffic onto Royal Brougham at the end of Stage 1 appears to conflict with the anticipated SR519 Phase II construction timeline for Royal Brougham.
- B-003-016** | Page 128, we would like more information about the proposed Downtown Transportation Operations Committee, who would be participating in the committee, the area covered, and the charter of the committee.
- B-003-017** | Page 169, the intent of the "public service contact plan" is unclear as to whom it is referring to.
- B-003-018** | Page 171, the public communications plan proposed in the Environmental Assessment appears to be relying on outdated methods of communication which rely on hardcopy flyers and rare public meetings that are time consuming to create or participate in, cumbersome for people to use, difficult to distribute, usually lacking in timeliness, hit-and-miss in getting to the right people, and costly. Speed and accuracy of information will be vastly more important to the public than would be glossy flyers or free cookies. There is no mention of email or other electronic methods of communication that can cost-effectively communicate with large numbers of people via "list serve" distribution. Not only is this method the quickest way to communicate but it also has fewer environmental impacts by not printing materials and not using fuel to deliver materials. Messaging must

whether or not the parking places affected by this project are removed. This effect is clearly described in the EA. Based on historical fact observed in this area and elsewhere, we expect that owners of other parking areas in the general vicinity will respond by making additional spaces available. The core question here is whether the presence or absence of the parking spaces affected by this project would cause an appreciable number of patrons to change their minds and not attend some event. We do not expect the change in parking to have any discernible effect on the functioning of these facilities or attendance at events, which is influenced much more by a sport's popularity and team's success in a given season. Therefore, we do not consider this a significant impact.

#### **B-003-008**

The construction staging and traffic detour scenarios will continue to evolve as designs are finalized, and the project team recognizes that event conditions are different than non-event conditions.

#### **B-003-009**

We recognize that Safeco Field is a regional event facility and is a large employer. As such, effects on Safeco Field are discussed throughout the EA. Replacing the viaduct will ultimately benefit the facility by providing a safer roadway and new northbound off-ramp and southbound on-ramp to SR 99 near S. King Street.

#### **B-003-010**

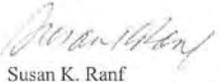
Information from transit agencies, the Mariners' website, and the Safeco Field Transportation Management Program were used to help inform the discussion of transportation options during events. The effects of the FTA ruling are assumed to be resolved before project construction starts since numerous major events will occur at the stadiums before

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Page 5

- B-003-018** | be succinct and to the point and avoid the long-standing tendency to include too much political boilerplate which dilutes the message and irritates the recipient. If public meetings are held they need to have meaningful content that cannot/will not be more completely provided by email distributions. Hardcopy glossy flyers should be used sparingly, if at all, once the project commences.
- B-003-019** | Page 173, with a year or more backlog in the production of transit vehicles by the manufacturers, does Metro actually have the capacity to add coaches beyond what they have recently received?
- B-003-020** | Page 173, the reference to "South End Transportation Demand Management" needs to be further studied to ensure the design of a TDM plan would not adversely impact access to the stadiums.
- B-003-021** | Page 174, the Mariners oppose conversion of general purpose lanes on First Avenue to transit only lanes north of Holgate as that would severely impact access to the ballpark and would result in even greater traffic backups. The conversion of the First Avenue off ramp from Spokane Street from general purpose to transit only would create massive difficulty for people from West Seattle trying to get to the event facilities and would be strongly opposed by the Mariners.

Thank you for the opportunity to comment. Should you wish to further discuss our comments we would be happy to set up a meeting. I can be contacted at 206-346-4236.

Sincerely,



Susan K. Ranf  
Director of Transportation

cc: Bart Waldman, Executive Vice President and General Counsel, Seattle Mariners  
Tom Backer, Legal Counsel, Public Facilities District  
Martha Fuller, Senior Vice President and CFO/VSE, Seahawks, FGI & Sounders FC

then. The project team looks forward to future coordination with the Mariners.

#### **B-003-011**

As noted above in response to B-003-009, some distinguishing terminology is needed to indicate that the schedule for events at these facilities does not follow the same pattern as normal working hours and daily traffic flow patterns.

#### **B-003-012**

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-003-013**

Other mitigation measures for potential planned utility disruptions are listed in the Public Services and Utilities section of Attachment 4 - Mitigation Commitment List. These include the development of a consolidated utility relocation plan for both short-term and long-term relocations, including a detailed description of service disruptions. Along with this plan, WSDOT will prepare a coordinated utility communication strategy to coordinate services to customers and to minimize or avoid temporary disconnections each time a utility is relocated. Limits on shutdowns would be documented in the construction plan as specified by the utility provider to minimize long-term effects. Utility providers will notify customers prior to planned service disruptions.

#### **B-003-014**

It is noted in the EA (p. 121) that "police and fire services will be affected

by traffic delays and detours during construction," and that "construction could require additional police support services to direct and control traffic and pedestrian movements and could result in increased response times to certain destinations." It is understood that the police staffing at stadium events is there to ensure adequate traffic control at each event, as noted in the comment, and would not be there to provide additional support during construction activities.

The EA goes on to acknowledge that construction activities and associated detour routes could result in increased response times at certain times during construction. A traffic management plan will be developed prior to the commencement of construction activities for implementation throughout construction. The traffic management plan will be developed in consultation and coordination with the Seattle Police Department, the Seattle Fire Department, the Port of Seattle, the stadium and event center facilities (including the Seattle Mariners), and King County Metro Transit.

**B-003-015**

Traffic would have been detoured to a short section of S. Royal Brougham Way that was not concurrently affected by SR 519 project construction. However, detour routes during construction have been revised since the EA was issued. Traffic is no longer anticipated to be detoured to S. Royal Brougham Way. Instead, Alaskan Way S. is planned to be widened to accommodate detour traffic on the west side of the construction zone.

**B-003-016**

At this time, there is no new information about the broader Downtown Transportation Operations Committee that is being considered by WSDOT, the City of Seattle, and King County.

**B-003-017**

This paragraph (EA p. 169, 3rd paragraph) referred to a potential mitigation measure for public service emergency access, and has been revised in Attachment 1, Errata to the EA and Discipline Reports, to clarify both the intent of the "public service contact plan," and to whom the notification would be made.

This statement refers to an unanticipated event occurring during construction activities that may unexpectedly restrict emergency service access to a segment of roadway, or other type of incident that may require a route modification for emergency services. If such an event occurs, two contacts for each public service provider agency (e.g., Seattle Police, Seattle Fire, or EMT services) would be available (per the public service contact plan) to enable WSDOT to alert the providers to the special circumstances. Two contacts would be provided, so if one contact could not be reached, a second contact person would be available to set contingency routes or modifications in routes in effect for the service providers, so that emergency services would not be compromised.

**B-003-018**

The project uses an electronic mailing list and regularly emails project newsletters and notifications. The project's communications team will continue to use email and the project website as a method to disseminate information quickly. Important project information is updated frequently, and regular monthly email updates can all be found on the web at:

<http://www.wsdot.wa.gov/Projects/Viaduct/emailupdate.htm>.

**B-003-019**

We have coordinated closely with King County, and they have not indicated any capacity problems in this regard.

**B-003-020**

TDM project descriptions for the south end continue to be developed and are anticipated to be coordinated with input from the Mariners.

**B-003-021**

The project team is committed to coordinating with the Mariners and evaluating the construction staging, traffic detour scenarios, and associated mitigation as project designs are finalized. Effects on stadium access will be considered in the evaluation.

In addition, 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.