

Attachment 5: Comments and Responses

Attachment 5: Comments and Responses

In this attachment, we present comments submitted to the Washington State Department of Transportation (WSDOT) on the Environmental Assessment (EA) for the SR 519 Intermodal Access Project Phase 2: Atlantic Corridor (the project), and our response to each comment. We received spoken comments (recorded during the February 20, 2008, public hearing and presented here as a transcript) and written comments submitted via email and letter. Each of the eight comment documents is presented in its entirety in the order shown in the following index. We prepared three summary comments to condense multiple comments that were similar in nature. These summary comments and our response to each are presented first. Following the summary comments and our responses, the comment documents are presented with numbers in the margins denoting individual comments. Our corresponding responses to the numbered comments follow each page of the public hearing transcript, emails, and letters.

Changes to the text of the EA, discipline reports, and technical memoranda are shown in the Errata (Attachment 1 to this FONSI). Changes to EA Appendix B, Best Management Practices and Mitigation Measures, are shown in the Mitigation Commitment List (Attachment 4 to this FONSI).

Index to Comments and Responses

Recorded Testimony at Public Hearing:

Douglas Peterson, February 20, 2008

Email Comments:

Vincent Koskela, Taxpayers on Strike, February 21, 2008

Michael Williams, Sound Transit, March 9, 2008

Letter Comments:

Paul E. Meyer, Port of Seattle, March 5, 2008

Susan K. Ranf, Seattle Mariners, March 7, 2008

Robert M. Powers, City of Seattle Department of Transportation, March 7, 2008

Kevin Callan, Washington State Major League Baseball Stadium Public Facilities District, March 7, 2008

Harold S. Taniguchi, King County Department of Transportation, March 10, 2008

Summary Comments and Responses

Several comments appeared multiple times in the communications received during the public comment period on the EA. To minimize repetition, these comments are summarized below.

Summary Comment 1: Some of the best management practices (BMPs) and mitigation measures discussed in the EA and in EA Appendix B, Best Management Practices and Mitigation Measures, are phrased as “could” rather than “would” or “will.” Commenters asked WSDOT to commit to using all BMPs and mitigation measures included in the EA, discipline reports, and technical memoranda.

Response: WSDOT is committed to the outcome of avoiding or minimizing adverse effects of project construction and operation, while at the same time allowing flexibility during construction to determine how mitigative outcomes will be best achieved under specific circumstances. For BMPs and mitigation measures that WSDOT knows will be used during construction, the EA and appendices use the word “will.” For those where actual conditions must determine the specific type of mitigation to be followed, the word “could” is used. WSDOT will apply and follow BMPs throughout project construction, consistent with the WSDOT *Construction Manual*, *Highway Runoff Manual*, *Hydraulics Manual*, and other applicable guidance. WSDOT will comply with the requirements of all applicable regulations and permits and approvals obtained for construction and operation of the project. In addition, WSDOT will:

- Prepare a traffic management plan (TMP) in consultation and coordination with King County Metro Transit, the Seattle Department of Transportation, the Seattle Police Department, the Seattle Fire Department, the Port of Seattle, and the stadium and event center facilities to be implemented throughout construction and to include procedures for the following: agency coordination, communication with stakeholders and the public, flexible and responsive management of traffic before, during, and after stadium area events and during peak traffic hours, strategies for redirecting traffic, notification of construction detours, hours of lane closures, nighttime construction, and other relevant topics.

- Convene a Maintenance of Traffic Task Force (MOTTF) with affected stakeholders and involved agencies that will meet regularly and as needed to resolve issues relating to potential or actual construction impacts on their operations.
- Coordinate with the King County Department of Transportation, the Seattle Department of Transportation, the Seattle Police Department, the Seattle Fire Department, and the stadiums and event center to minimize construction-related traffic effects before, during, and after events at the stadiums and event center.

Summary Comment 2: Clarify whether street-level access by emergency response vehicles will be provided at the South Royal Brougham Way crossing of the BNSF Railway mainline during construction and operation.

Response: WSDOT will ensure that street-level emergency access is provided at the South Royal Brougham Way railroad crossing during and after construction of the project. During construction, one lane will remain open in each direction to emergency vehicles at all times, as discussed on EA page 1-6 and 5-139. For project operation, WSDOT will incorporate street-level emergency access into the design of the roadway improvements at the South Royal Brougham Way railroad crossing, as discussed on EA page 5-141. The discussion on EA page 4-4 has been revised (Attachment 1) to emphasize WSDOT's commitment to provide street-level emergency access at this location. WSDOT is in ongoing coordination with the City of Seattle and BNSF Railway to determine, from a design standpoint, how emergency access will be provided during project operation.

Summary Comment 3: WSDOT should install a traffic signal at the intersection of First Avenue South and South Massachusetts Street to mitigate slight north-south delays projected by traffic modeling.

Response: Appendix M of the EA, the Transportation Discipline Report, presents the results of analyses indicating that in 2011, the intersection of First Avenue South and South Massachusetts Street will perform better with the project than under the No Build Alternative. These results are shown in Appendices A9-A and A9-B to the Transportation Discipline Report. Only the 2030 analysis indicates that the intersection might show delays under the Build Alternative relative to the

No Build scenario (Appendix A11-B). This intersection performs at or near LOS F today. Background traffic growth, adding to the existing low functionality at this intersection, accounts for the projected poor traffic operations at the intersection by 2030. Currently there is no signal at this intersection. Although a slight increase in traffic volume attributable to the SR 519 Phase 2 project will increase delays at the intersection by 2030, the projected change is minor and would likely be too small to justify installation of a traffic signal or restrictions on side-street approaches.

Recorded Testimony at Public Hearing
Douglas Peterson, February 20, 2008, Page 1

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SR519 Intermodal Access Project
Phase 2: Atlantic Corridor
Environmental Assessment Public Hearing

PUBLIC COMMENTS

February 20, 2008
Seattle, Washington

Byers & Anderson, Inc.
Court Reporters/Video/Videoconferencing

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February 20, 2008

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Page 2

1 BE IT REMEMBERED that on Wednesday,
2 February 20, 2008, at an SR519 Intermodal Access
3 Project, Phase 2: Atlantic Corridor Environmental
4 Assessment Public Hearing taking place at 401 South
5 Jackson Street, Seattle, Washington, at 4 p.m., the
6 following public comments were given, to wit:

7

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<<<<<< >>>>>>

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10 Douglas Petersen
11 4120 Southwest 104th
12 Seattle, Washington 98146-1121
13 (206) 888-7441

14

15 I would be curious, when construction starts in
16 October, if there will be announcements about detours
17 and if this project is going to last a couple years.
18 And I would be interested in inquiring about
19 employment for the road construction project.

1

2

20 And I guess I feel that they're going forward on
21 this and it needed to be done, and it will help
22 circulate traffic better. And hopefully if they have
23 to block the rail line at all, they'll announce that
24 ahead of time so people can make alternatives.

3

25 And I would like to inquire about a postcard

February 20, 2008

Response to Douglas Peterson:

1. During construction, WSDOT will make public announcements in advance of major lane closures and provide information about dates, times, durations, and detour routes to facilitate continued traffic flow. The information has been added to the transportation mitigation discussion beginning on EA page 5-131 (Attachment 1).
2. Future inquiries about employment opportunities during construction should be directed to the contractor firms that are hired by WSDOT to build the project.
3. Please see response to Peterson Comment 1.

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Page 3

1 or -- and I would be curious if there's going to be
2 any more public meetings or if this is it. I would **4**
3 like to see it on cable access. And I might want to
4 see some kind of, like, progress report.

5 So I guess I would like to see a statue dedicated
6 to that guy that served peanuts and beer at the
7 Kingdome that is much loved and lost. I guess he is **5**
8 a Seattle icon like Ivar, Mr. Ivar, and Chief
9 Seattle. And I'm glad I was able to come to a
10 convenient place for the public meeting.

11 (Comment concluded.)
12 (Verbatim transcription of
13 public comments concluded.)
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February 20, 2008

Response to Douglas Peterson:

4. No further public meetings are planned. Progress updates will be available throughout the project construction period on the WSDOT SR 519 project website at:

<http://www.wsdot.wa.gov/Projects/SR519/>

5. WSDOT will continue ongoing consultation with the City of Seattle, including the Seattle Design Commission, regarding structural design elements of the project.

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1 STATE OF WASHINGTON) I, John M.S. Botelho, CCR,
2 County of Pierce) ss CCR # 2976, a duly authorized
3 Notary Public in and for the State
4 of Washington, residing at
5 University Place, do hereby certify:

6 That the foregoing PUBLIC COMMENTS were given
7 before me on February 20, 2008, and thereafter were
8 transcribed under my direction; that the transcript is a
9 full, true and complete transcript of said comments;

10 That I am not a relative, employee, attorney or
11 counsel of any party to this matter or relative or employee
12 of any such attorney or counsel and that I am not
13 financially interested in the said matter or the outcome
14 thereof;

15 That I am herewith securely sealing the said
16 transcript and promptly delivering the same to
17 The Washington State Department of Transportation.

18 IN WITNESS WHEREOF, I have hereunto set my hand
19 and affixed my official seal this day of
20 , 2008.

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24
25

February 20, 2008

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Comments Received Via Email

Vincent Koskela, Taxpayers on Strike, February 21, 2008

From: VINCENT KOSKELA [mailto:v.koskela@worldnet.att.net]
Sent: Thursday, February 21, 2008 5:14 PM
To: SR 519 Intermodal Access Project
Subject: The Birth of SR 519 - A Road Ramp Project Specifically Designed To Provide Ramps To The "Safeco Field" & "Qwest Field" Parking Garages

THE WASHINGTON STATE DEPARTMENT OF TRANSPORTATION
999 Third Avenue, Suite 2424
Seattle, Washington 98104

Allison Hanson:

When the legislation for the funding of "Safeco Field" and "Qwest Field" was passed, there were specific Sections included which **specifically prohibited** any additional funding for either sports stadium project. In the case of the baseball stadium project, ENGROSSED HOUSE BILL 2115 Section 106 states: ***The state will not make any additional contributions based on revised cost or revenue estimates, cost overruns, unforeseen circumstances, or any other reason.*** In the case of the football stadium/exhibition center project, ENGROSSED SUBSTITUTE HOUSE BILL 2192 Section 218, Part (2) states: ***The state will not make any additional contributions based on revised cost or revenue estimates, cost overruns, unforeseen circumstances, or any other reason.***

There was a specific amount of public money allowed for each project. \$320 Million for "Safeco Field" and \$300 Million for "Qwest Field" (not including bond interest).

I attended a Public Facilities District public meeting where the Executive Director unveiled a plan to "dupe" the Washington State Legislature and Department of Transportation into funding a ramp into the baseball stadium parking garage and another ramp into the football stadium/exhibition center parking garage which would connect to I-5, I-90 and Route 99. Providing quick access to the freeways using these ramps would be a huge selling point in getting season ticketholders to buy \$150,000 Luxury Boxes. The Executive Director suggested going to the Port of Seattle and asking the port to be a partner in the Road Ramp Project titled SR 519, a numbered project the Port had tabled and abandoned. By bringing in the Port of Seattle, the parking garages ramps project could be designated a "freight mobility" project which would circumvent the Legislative Prohibitions. It would lead the state to believe that the \$89 Million cost for each ramp connection was not for the stadiums, but for moving freight to and from the Port.

Not only did the total cost of the SR 519 Project rise to \$358 Million, but the Port of Seattle later asked what they were getting out of the supposed partnership. After the Seattle Mariners had their parking garage connected to the freeways, in Phase 1, they were not interested in what the Port or the Seahawks would get in Phase 2. Crossing First Avenue was not a concern.

SR 519 IS A TOTALLY ILLEGAL PROJECT AND IS A DIRECT VIOLATION OF BOTH STADIUM LEGISLATIVE BILLS. Playing "fast" and "loose" with the Public's Money will not be tolerated. The Public Facilities District, the Mariners, the Public Stadium Authority, the Seahawks, the State Legislature, WSDOT, King County Government, the Seattle City Council and the Governor have all been informed of the unethical, deceiving, fraudulent nature of this SR 519 SCAM. The State Auditor agreed that inappropriate manipulation of public funding had taken place, but, the Auditor had no enforcement powers. No action to terminate SR 519 has been taken, because there is and has been absolutely NO OVERSIGHT.

It is time to terminate the SR 519 Project. The remainder of the \$358 Million (approximately \$200 Million) should be directed toward other needed legal projects. The Mariners should pay for the cost of the completed ramp serving the "Safeco Field" Parking Garage.

Sincerely,

Vincent Koskela
"TAXPAYERS ON STRIKE"
10018-62nd Avenue South
Seattle, Washington 98178
(206)-723-7280

Response to Vincent Koskela, Taxpayers on Strike:

It is true that the stadium legislation stated that Safeco Field and Qwest Field would be given no additional funding from the legislature. However, that legislation concerned the construction of the stadium projects themselves. The legislature may have been concerned that the stadium districts would request additional funds to complete the construction, or might request funds to cover cost overruns that could occur during stadium construction.

Our SR 519 Phase 2 project is separate and distinct from the construction of the stadiums. The stadium legislation applies only to the stadium construction, which was completed several years ago, and it does not apply to our highway project.

When a WSDOT project limits or alters access to a property, WSDOT is obligated to provide similar access to the affected party. In this case, we are treating the stadiums in the same way as we would any other landowner.

With regard to Safeco Field, when WSDOT built the SR 519 Phase 1 project (Edgar Martinez Drive South), it bisected the stadium district's property. Safeco Field had an existing parking garage with full ingress and egress, and WSDOT was required to give them reasonable access to their parking facility.

Regarding Qwest Field, the SR 519 Phase 2 project will include a railroad overcrossing between the two stadiums, where South Royal Brougham Way is now. Today, patrons can access the parking garage using a surface street, coming in from the east or west. After the project is complete, patrons will have access via only one lane, from the west. The new ramp will be mitigation for the access that will have been removed. Also, part of the project will be built on stadium district property, and after construction has been completed, the ramp will be maintained by the stadium district. This portion of the project is mitigation for lost access and compensation for the property that is being used for the project.

The actual cost of the SR 519 Phase 1 transportation project was \$107 million. The estimated cost of the SR 519 Phase 2 transportation project is \$74.4 million. The funding numbers you reported in your letter appear to be the amounts authorized to construct the stadiums themselves. The budget authorizations for the stadium projects are not connected to the budget authorization for the highway improvements.

From: Williams, Michael [mailto:michael.williams@soundtransit.org]
Sent: Sunday, March 09, 2008 2:38 PM
To: SR 519 Intermodal Access Project
Cc: Kriedt, Gary; ron.moattar@metrokc.gov; Beckman, Eric; Bergman, Mike
Subject: SR 519 Intermodal Access Project Phase 2: Atlantic Corridor Environmental Assessment Comments

Allison Hanson, Deputy Director of Transportation
Urban Corridors Office
Washington State Department of Transportation
999 Third Avenue, Suite 2424
Seattle, WA 98104\
SR519@wsdot.wa.gov

SR 519 Intermodal Access Project Phase 2: Atlantic Corridor Environmental Assessment Comments

Dear Ms. Hanson:

Thank you for the opportunity to provide comments for the SR 519 Intermodal Access Project Phase 2: Atlantic Corridor Environmental Assessment. Sound Transit has been working with WSDOT to address the potential impacts associated with the project both in the area of Stadium Light Rail Station and the Sounder operations on the BNSF mainline tracks.

Link light rail is currently testing trains between its Forest Street Operations and Maintenance Facility and the Stadium Station located just south of Royal Brougham Way. This track area has been certified as a test track for the purpose of burning in new vehicles as they arrive from now through the revenue start-up date of July 3, 2009. When revenue service starts in July 2009, trains will operate 20 hours per day (5:00 am until 1:00 am), seven days a week.

The inauguration of light rail service in the corridor from downtown Seattle to SeaTac Airport has been decades in the making, and it is imperative that the users of the system not be impacted by the construction of the new elevated structure that will be attached to the westbound lanes of SR519.

- 1 Sound Transit and WSDOT entered into the I-90 Airspace Lease on September 22, 2003. Section 38 of the airspace lease states that it is in the interests of Sound Transit for the Phase 2 work be constructed in an expedient manner so as to minimize interference with Sound Transit authorized use. The lease goes on to state that Sound Transit and WSDOT should work together to plan and design the project in a manner that will not unreasonably interfere with the light rail operations.

- 2 Sound Transit and WSDOT have been coordinating on Phase 2 of the 519 Intermodal Access Project, and we want that coordination to continue. Following a meeting between the agencies in April 2007, Sound Transit provided a CD with all the Sound Transit and WSDOT agreements pertaining to the Royal Brougham Way area, up-to-date CADD drawings of the light rail facilities and specifications for the construction of an enclosure that would protect the overhead contact system (OCS) during construction of the WSDOT ramp. It is critical that the construction schedule established by WSDOT is coordinated with Sound Transit.

- 3 The preparation of the environmental assessment should recognize the on-going coordination between the agencies and incorporate the types of mitigation measures that have been identified to-date.

- 4 Two other areas of potential impacts are bus operations on the E-3 Busway and Sounder operations on the BNSF mainline tracks. King County Metro and Sound Transit operate hundreds of bus trips on the E-3 Busway each day. The busway also provides access to Metro's Ryerson Base. Many of the buses traveling on the busway cross Royal Brougham Way and continue into the Downtown Seattle Transit Tunnel. The construction of the new elevated structure that will be attached to the westbound

Response to Michael Williams, Sound Transit:

1. WSDOT is committed to working in close coordination with Sound Transit to ensure that construction of the project does not unreasonably interfere with light rail operations.
2. WSDOT is committed to coordinating the project construction schedule with Sound Transit. WSDOT will comply with all agreement terms that relate to the project.
3. As stated on EA pages 4-5 and 4-6, construction management will be coordinated with and minimize unwanted effects on Sound Transit Link light rail operations, Sounder Commuter Rail service, and Regional Express bus operations.
4. WSDOT is committed to continuing its ongoing consultation and coordination with Sound Transit and King County Metro to minimize construction-related impacts of the project on Sounder Commuter Rail service and E3 Busway operations.

lanes of SR519 has the potential to interrupt the bus service on the E-3 Busway in the vicinity of Royal Brougham Way. Provisions should be made to minimize these impacts.

- 5 Souder Commuter Rail service operates on the BNSF rail lines that cross Royal Brougham Way. The construction of the elevated roadway and pedestrian bridge along Royal Brougham Way should be staged in such a way as to keep Souder service in operation at all times.

Again thank you for the opportunity to provide scoping comments on Phase 2 of the SR 519 Intermodal Access Project. If you have any questions or would like clarification of the comments we have provided please do not hesitate to contact me at 206-398-5145, or e-mail me at williamsm@soundtransit.org.

Sincerely,

Michael Williams

Michael Williams
Project Development Manager
Link Light Rail

cc: Mike Bergman, Sound Transit
Eric Beckman, Sound Transit

Response to Michael Williams, Sound Transit:

5. WSDOT will coordinate closely with Sound Transit to help ensure that Sounder Commuter Rail service continues uninterrupted during construction of the elevated roadway and pedestrian bridge over the rail lines at South Royal Brougham Way.

Letter Comments

Paul E. Meyer, Port of Seattle, March 5, 2008, Page 1



March 5, 2008

Margaret Kucharski
Washington State Department of Transportation
SR 519 Intermodal Access Project
999 Third Avenue, Suite 2424
Seattle, WA 98104

WSDOT
AWV/SR519
MAR 07 2008

Received
DOC Control TS

P.O. Box 1209
Seattle, WA 98111-1209
USA

Tele: (206) 728-3000
Fax: (206) 728-3252

www.portseattle.org

Dear Ms. Kucharski:

The Port of Seattle appreciates the opportunity to submit comments to Environmental Assessment of Phase 2 of the SR-519 Intermodal Access Project. As part of the SR-519 project partnership since 1996, a funding partner, and an environmental process cooperating partner of Phase 2, the Port has worked with the City of Seattle and the Washington State Department of Transportation to find a workable Phase 2 design. We believe our review and comments during the scoping and review process for the Phase 2 have helped focus and guide the study leading to an effective design strategy that ensures that Phase 2 of the project meets the conceptual goals of freight mobility, pedestrian/cyclist safety and good environmental/community stewardship.

The following raises specific question and comments regarding several environmental elements. We are looking forward to the release of the FONSI and hope that the following concerns are addressed both in the FONSI and during design, construction, and operation of the project.

Impacts of prohibition of north-bound left-turn movement from 4th Ave S to S Atlantic St on trucks

1 The proposed prohibition of the north-bound left-turn movement from 4th Ave S to S Atlantic St will make it more difficult for trucks attempting to access Terminal 46 from the south and east Duwamish. We understand that this movement will need to be prohibited for all (but, potentially, transit) vehicles to ensure the functionality of the intersection. The potential impacts of this prohibition on freight mobility have not been discussed in the EA, but have recently been raised as a concern by the trucking community. There may be a need for some trucks to use the S Royal Brougham Way overpass to get across the railroad trucks. We must work with the City to ensure that there is adequate local truck access to the waterfront once the prohibition is in place.

Ensure that SR-519 functions as a major freight and regional traffic corridor

2 On p. 5-129, the document states: "The proposed I-90 off-ramp to S. Atlantic St. will be designed to accommodate the largest interstate semi-trailer trucks so that oversized cargo can be transported safely & efficiently. The project will not require any restrictions regarding the transportation of hazardous material." The Port would like to reiterate that design of the west bound off ramp should accommodate all trucks without any restrictions regarding the legal transportation of hazardous materials.

Response to Paul E. Meyer, Port of Seattle:

1. 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. The text on EA page 5-126 has been revised to discuss the prohibition of left turns (except for transit) onto South Atlantic Street from northbound Fourth Avenue South. The revised text emphasizes that trucks northbound on Fourth Avenue South will have opportunities for left turns at intersections south of South Atlantic Street and also one block north at South Royal Brougham Way. For these reasons, the project will have no adverse effect on freight traffic.

2. The project improvements will be designed and operated to allow the safe and legal transportation of hazardous materials, as stated on EA page 5-129.

Move designation of Mountains to Sound Greenway to S Royal Brougham Way

3 In its current configuration, S Atlantic St is designated as part of the Mountains to Sound Greenway. With completion of SR-519 Phase 2, the Mountain to Sound Greenway routing should be moved to S Royal Brougham Way. This new route is a safer path that does not encourage pedestrian and cyclist movement across a new westbound freeway off-ramp, avoids the potential of reducing the capacity of the freeway off-ramp, and is consistent with City of Seattle goal of promoting South Royal Brougham Way as a pedestrian and bicycle route (ref p. 5-67).

The following comments serve to support our contention that the Mountains to Sound Greenway should be routed to S Royal Brougham Way.

- S Atlantic St will serve as both freeway on- and off-ramp. In 2030, it is projected to carry over 35,000 trips per day, mostly freight and regional traffic. This includes almost 9,000 daily trips on the freeway ramp. Making additional provisions for non-motorized safety, such as eliminating a free right turn from the freeway ramp, or narrowing the turn radius to shorten the crossing distance for non-motorized traffic, would reduce the capacity and functionality of the facility for its intended purpose, serving freight and regional traffic. In addition, bicyclists and pedestrians bound for the waterfront will have to cross the two left turn lanes from south-bound 1st Ave S to S Atlantic St at that intersection.
- By comparison, S Royal Brougham Way is designed as a local connector, with significant investment in new bicycle and pedestrian facilities. Due to the design of the facility, motorized traffic is both lower in volume, with about 11,000 total daily trips in 2030, and slower than on S Atlantic St. Bicycle and pedestrian traffic should be routed to S Royal Brougham Way, as indicated in the EA (TDR, p. 1-3). Bicycles and pedestrians crossing 1st Ave S at S Royal Brougham Way to reach the waterfront will need to cross only a single south-bound left-turn lane, carrying significantly lower volumes than the left turn lanes onto S Atlantic St.
- The EA indicates (p. 5-112) that, apart from Qwest Field and Safeco Field, major pedestrian and bicycle attractors in the area include Colman Dock, King St. Station, and the bus tunnel. These facilities are located to the north of the project. The limited number of pedestrians and bicyclists wishing to follow the Mountains to Sound Greenway to its terminus in West Seattle can use new non-motorized facilities between S Royal Brougham Way and S Atlantic St to access S Alaskan Way.
- The majority of bicycle and pedestrian movement on S Atlantic St will occur before and after events at Qwest Field and Safeco Field, when the freeway off-ramp to S Atlantic St will be closed or actively managed.

Maintain functionality of the intersection at 1st Ave S and S Massachusetts St

4 The EA suggests (p. 5-133) that at the intersection of 1st Ave S and S Massachusetts St, either a signal or restriction on turns from S Massachusetts St should be put in place. While we do not

Response to Paul E. Meyer, Port of Seattle:

3. The EA does not identify any impacts of the project that would warrant relocating the Mountains to Sound Greenway. Either South Atlantic Street or South Royal Brougham Way could accommodate the trail now and in the reasonably foreseeable future. Within the study area, the Mountains to Sound Greenway is maintained by the City of Seattle, and any movement of the trail would be based on a decision by the City, which would work with the Mountains to Sound Greenway Trust. WSDOT would not be involved in a future decision to alter the route, provided the functionality of WSDOT facilities would not be affected.

4. Please see our response to Summary Comment 3.

Port of Seattle EA Comments
Page 3 of 4

anticipate a significant movement of trucks trying to make a left turn onto 1st Ave S, we would prefer a signal to turning restrictions. There are several reasons for our position:

- There may be a limited number of trucks carrying containers that will need to make that movement from N SIG Yard to the freeways.
- An alternate route via the intersection of S Utah Ave and S Atlantic St also will have capacity challenges. In addition, the distance between S Utah Ave and 1st Ave S is very short, making it difficult for trucks to cross the right-turn lane to get into a through lane.
- 1st Ave S will be very busy along this stretch, and all other intersections will be metered. Signalizing 1st Ave S and S Massachusetts St may help meter traffic flow and reduce pressure on the 1st Ave S and S Atlantic St intersection.
- With increased volumes of pedestrians, it would provide for a safer crossing.

Commit to Construction Transportation Management Plan

The EA indicates (p. 4-5, 5-139) that there will be a Construction Management Plan for the project, whereas the Draft EA outlined the potential for such a plan. However, elsewhere, **5** the document is less overt in agreeing to this (for example p. 5-67 and 5-132). We think it is important that WSDOT firmly commit to requiring the design-build team to develop a construction management plan (CMP) and work with the stakeholder community throughout the construction process.

Maintain Event traffic management flexibility

The EA makes a categorical statement (p. 5-128) that both S Royal Brougham Way and S Atlantic St will be closed after events except for garage egress. We agree that severe restrictions are necessary to protect pedestrians before and after major events. However, we understand that **6** Seattle Police Department traffic control officers can and do exercise their professional judgment regarding application of restrictions during certain special instances, e.g. if a vehicle is lost. We hope that there will be opportunity for adjustments to event traffic flow management once the new facility is in use, and there is experience with the functionality of the proposed traffic management approach.

Clarify Emergency Access over RR Tracks on S. Royal Brougham Way

It is clearly a tantamount goal and benefit of the project to “improve safety and reduce traffic delays by closing the surface-level rail crossing on South Royal Brougham Way near Fourth Avenue South and replacing it with an elevated crossing for vehicles, bicycles, and pedestrians.” (p 1-2). However in several sections of the documents there are references to maintaining or **7** establishing a street-level access for emergency response vehicles on the South Royal Brougham Way at the BNSF Railway track crossing near 4th Ave. For example, in the Operational Mitigation section under Event Traffic there is a reference for a plan that in order to “maintain emergency vehicle access, a lane will be kept open on the surface street of S. South Royal Brougham, a measure which would prevent buses from lining up there” (p. 5-135). Also on page 5-141, the document states that “WSDOT & the City of Seattle are in consultation to determine how street-level access to emergency response vehicles will be provided on S. South Royal Brougham at the crossing of the BNSF Railway tracks.” It is important, given the Port’s

Response to Paul E. Meyer, Port of Seattle:

5. Please see our response to Summary Comment 1. WSDOT is committed to developing a traffic management plan in coordination with the project's core stakeholders through the Maintenance of Traffic Task Force (MOTTF), which will be established during project design and continue through project construction.

6. Traffic management during stadium area events will be flexible and will be coordinated with the Seattle Department of Transportation and Seattle Police Department. These streets are under the control of Seattle Police Department traffic control officers during stadium-area events, and the Seattle Police Department can and does exercise their professional judgment regarding how traffic restrictions are applied under specific circumstances. Event traffic flow management by the Seattle Police Department will be adaptable to specific conditions at the discretion of the traffic control officers. The referenced text on EA page 5-128 has been revised to state that "Additional traffic control is implemented in the area by the Seattle Police Department to minimize traffic conflicts with large pedestrian surges. Post-construction operations on South Royal Brougham Way, including periods associated with events, will be the responsibility of the City of Seattle."

7. Please see our response to Summary Comment 2. Emergency access across the railroad tracks on South Royal Brougham Way will be possible during and after project construction. Details of how such access will be controlled post-construction will be determined through ongoing coordination with the City of Seattle and BNSF Railway.

Port of Seattle EA Comments
Page 4 of 4

investment in the project, that the grade crossing is closed in a way that meets the needs of BNSF Railway and that project proponents clarify the situation in which access across the grade would be allowed.

Thank you for the opportunity to comment. We look forward to the completion of this important transportation project.

Sincerely,



Paul E. Meyer
Senior Environmental Program Manager

Cc: Geri Poor
Christine Wolf
Stephanie Jones Stebbins
Eric Hansen



March 7, 2008

Alison Hanson, UCO Deputy Director of Environmental Services
Washington State Department of Transportation
Alaskan Way Viaduct and Seawall Replacement Program
999 Third Avenue, Suite 2424
Seattle, WA 98104

RE: Comments on SR519 Intermodal Access Project Phase 2: Atlantic Corridor EA

The Seattle Mariners appreciate the opportunity to comment on the Environmental Assessment for the SR519 project. As the sole tenant of Safeco Field we hold a long-term lease on the property. We need to ensure that the ballpark remains accessible not only for baseball fans but for private clients who have contracted with us to hold their events at Safeco Field. We must also be able to ensure to our customers that the environment in which they plan to hold their event is conducive to their needs. As the managing tenant of the ballpark we have responsibility for ensuring the ballpark is maintained to the industry standard acceptable to the Public Facilities District, the owner of the ballpark.

As a major event facility we are totally reliant on the street system around the ballpark to get customers to our facility. With a game seating capacity of 47,000 we draw between 2.5 and 3.5 million fans to major league baseball games each baseball season. As a provider of event space we routinely attract over 200 private events ranging in size from small events to over 48,000 participants each year. In addition we host multiple public and private tour groups every day including educational tours for school children. Our private event clients range from large business meetings, to school graduations, to job fairs, to religious events and more. We are a facility that attracts many, many children's events. We have previously supplied information to WSDOT demonstrating the types and frequency of the various events we host.

Good transportation planning and management is critical to operation of the ballpark. As a condition for permitting of Safeco Field, the City of Seattle established a requirement that the ballpark would not build enough on-site parking spaces to accommodate the maximum number of automobiles the could be expected for major league baseball games, approximately 14,400 autos. Instead, the City established the expectation that the majority of automobiles would be parked in remote lots and garages, especially in the central business district to the north with a smaller number of vehicles parking in the



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industrial area to the south. In addition, those fans coming to major league baseball games by transit would be expected to walk from and to bus stops at locations 2 to 6 blocks from the ballpark. Consequently only a small minority of attendees, estimated at approximately 6000 (of 47,000), are able to access the ballpark without crossing Atlantic Street, Royal Brougham Way, First Avenue or Fourth Avenue. While the Seattle Police Department provides traffic control services for all major league baseball games, the fact remains that the majority of games, 48 of 81 in 2008, occur on weekday evenings, which provides a challenging pedestrian environment even under existing conditions, and while SPD also provides traffic control services for larger non-baseball events, it remains a fact that there are a considerable number of smaller private events happening every day which increase the number of pedestrians in the area on a daily basis.

Because the many road construction projects in planning are either directly next to the ballpark or within one to two blocks, more than any other business or facility in this area we will be subject to continuous impacts from public projects for the next 7 to 10 years. Consequently, we have significant concerns regarding the type, quality and effectiveness of the environmental assessment and the mitigation measures being planned for this project, both during the project(s) and permanently once the project(s) are completed. Along with the Public Facilities District we are writing to ensure we are consulted regarding mitigation plans for the project.

We have reviewed the letter being submitted by the Public Facilities District, the public agency that owns Safeco Field, and we concur with the points raised in their letter.

As stated above, mitigation of impacts must be adequately addressed. Throughout the EA document we see references to mitigation measures however, those references seem to be directed to fixing problems as they are identified. This is not acceptable when that approach places the ballpark at risk, especially risk of any structural damage. While this approach would be appropriate in some instances, there are specific areas of concern where WSDOT must identify risks and plan for mitigation before the contract for the project is issued.

Our concerns follow. In some cases those concerns have been identified by EA section, and in others by specific reference to a page or paragraph.

Geotechnical

The proximity of the Royal Brougham structure to the north wall of Safeco Field is of considerable concern. If there is any risk for vibration being induced either during construction or during operation of the roadway this must be mitigated. The potential for adverse effects on the electronic equipment needed to operate a major league baseball facility along with the potential negative effect on the structure, operation and maintenance of the retractable roof are not inconsequential. The risk to the ballpark must be thoroughly addressed before the project commences and should included state of the art (BMP) design features and measures to ensure that the ballpark structure and equipment does not suffer either during construction or during operation of the roadway.

Response to Susan K. Ranf, Seattle Mariners:

1. The Seattle Mariners' concern about vibration impacts is acknowledged, and a brief discussion of potential impacts and mitigation during construction and operation was added to EA Section 5.1, Geology and Soils, page 5-15 (Attachment 1) to address this concern. More detailed discussions of this topic were added to EA Appendix G, Geology and Soils Discipline Report, on page 5-12 (Attachment 1). During preparation of the discipline report, specific discussions took place with structural designers regarding the potential impacts of vibrations. These discussions covered the levels of possible vibrations and methods of minimizing these vibrations. The mitigation measures identified during these discussions included avoidance of roadway features that could serve as source of vibrations, as well as use of isolation joints between the roadway structures and the parking garage on the north side of South Royal Brougham Way.

The conceptual design of the South Royal Brougham Way structures specifically selected drilled shaft foundations instead of driven pilings to minimize the potential for vibrations during construction of the structure foundations. Other sources of vibration will also occur during construction. To address these sources of vibration, design and construction documents will require that contractor select methods of construction that will minimize vibration. Any damage from vibrations will have to be repaired by the contractor.

The potential for vibration-induced damage during operations is believed to be very small and should be less of a risk than currently exists with at-grade conditions on the South Royal Brougham Way roadway and the adjacent rail lines. The surface of the new roadway will be smooth and without joints. Because the new structure will be supported by deep shaft foundations, any vibrations that are developed will have to travel from the structure through the foundations to greater than 60 feet below the existing ground, over to the foundations supporting Safeco Field, and back up to the structure. The energy losses from this travel path should result in vibrations levels that are lower than what occurs from the nearby railroad and surface conditions of existing South Royal Brougham Way. Further discussions will occur between WSDOT and those responsible for final design of the structure to assure that the vibration issue is appropriately addressed.

On page 5-9 the statement is made ***“Soil compression beneath the elevated structures, particularly the fill embankments for the approaches to the South Royal Brougham Way overpass, could lead to long-term ground settlement and lateral movement of soil.”*** This is an alarming statement when taken in the context of the proximity of the proposed westernmost fill embankment which will be less than fifty feet from the north wall of the ballpark, and the structure and trackway that support the retractable roof and operational movement of the retractable roof. The potential for lateral movement must be thoroughly understood and properly mitigated to prevent any possibility of damage to the ballpark, and in particular, the roof structure. This becomes even more alarming when considered in the context of the very old, brick-construction 96 inch sewer, the Elliott Bay Interceptor, which resides in the area where that same fill embankment will be constructed. A similar concern is raised by the statement on 5-14 regarding the potential impacts of vibration on nearby structures. There is also concern for the redundant fire loop which resides under the sidewalk on the north side of the ballpark which could be damaged by less aggressive settling as described on page 5-13.

2

It cannot be overstressed that the issues of vibration and settlement, or any other geotechnical issues, must be addressed sufficiently to avoid any potential damage to the ballpark roof structure either during construction or during operation of the roadway.

Environmental Health

The EA does not address the issue of the special fire/life safety requirements peculiar to the stadiums. With a construction period of about two years, it is likely that at least one, if not two, baseball seasons will coincide with this project. Consequently it is important that the EA address the unique stadium fire/life safety measures that must be understood and incorporated in the construction project. Of particular concern is the need to maintain the existing ability to evacuate either facility quickly during an emergency.

3

In the EA it is noted that equipment idling should be minimized. This is not only an issue of noise reduction but also important to reduce the amount of air pollution which will seep into the ballpark, an issue which has been previously identified as a problem along Royal Brougham Way and near the ballpark loading dock under certain climate conditions.

4

Noise

Certain types of noise can be disruptive to professional baseball games, and to the many non-sporting events that we host. In the section on Noise, page 5-43, the EA fails to adequately recognize that the two stadiums host a considerable number of non-sporting events, a significant number of which are noise sensitive events such as large business meetings, job fairs, concerts and religious events. This section of the EA, especially page 5-43, paragraph three fails to acknowledge that the two facilities host events other than sporting events: *“Although the stadium district is the core of the study area the stadiums themselves were not considered noise sensitive properties because they are used for*

5

Response to Susan K. Ranf, Seattle Mariners:

2. WSDOT acknowledges the Seattle Mariners' concern about ground settlement, and discussions of potential impacts and mitigation during construction and operation were added to EA Section 5.1, Geology and Soils, page 5-15 (Attachment 1) to address this concern. More detailed discussions of this topic were added to EA Appendix G, Geology and Soils Discipline Report, on page 5-12 (Attachment 1). Geotechnical analyses performed during final design will specifically address the issues of settlement. The distance and types of supports for the retractable roof appear to be such that settlements from the approach will not affect the structure. The approach fill on the west end of South Royal Brougham Way will be less than 5 feet high, and this fill height will not affect the structure. On the east end, the fill will be about 18 feet high. The distance between this fill and the closest structure appears to be too great for settlement from this fill to affect the closest roof support. Normally the amount of lateral movement for a well designed structure will not extend 50 feet from the new structure.

Further consideration will be given to the roof support concern during final design. If it is determined from these studies that there is a potential for roof supports to be affected, then mitigation methods will be used to minimize new loads being imposed to the soil. These mitigation methods could involve use of ground improvement that reduces ground settlement of the proposed fill.

The potential effects of project construction on the reinforced concrete (formerly brick) sewer line and other utilities have been evaluated by the designers. The deep foundations supporting the South Royal Brougham Way structure will avoid damage to existing utilities by transferring loading directly to competent bearing material below the utilities. The location at the west end of the structure where the elevated structure changes to earth fill was also selected to minimize the amount of approach fill on South Royal Brougham Way. Construction documents will require that all existing utilities and structures be protected during construction. At the east approach fill near Third Avenue South, where long-term settlements could affect existing utilities, measures have been identified for relocating the utility or protecting the utility in place.

See response to Mariners Comment 1 regarding vibration-related effects.

3. WSDOT will coordinate with the Mariners and the Seattle Fire Department to ensure that existing stadium fire/life safety measures and evacuation procedures are maintained throughout construction of the project improvements.

4. As stated in the Mitigation Commitment List (Attachment 4), WSDOT will develop and apply a range of mitigation measures, such as minimizing the idling time of power equipment, to keep construction noise as low as practicable. In addition, as noted in Attachment 4 under Air Quality, Construction Mitigation, machinery engines will be maintained in good mechanical and service condition to minimize exhaust emissions. The phasing in of ultra-low-sulfur diesel fuel by 2010 will achieve a 97 percent reduction in fuel sulfur content and decrease the levels of sulfur dioxide and particulate matter in equipment exhaust emissions.

5. Because noise levels at Safeco Field, Qwest Field, the WaMu Theater, and office spaces would increase above current conditions during construction, WSDOT would coordinate closely with these facilities. Construction noise would not exceed the maximum permissible sound levels specified in the Seattle Noise Ordinance (SMC 25.08.425) unless a variance is obtained. The complete ordinance is presented in Appendix E. This information has been added to EA page 5-43 and to Appendix J, Noise Discipline Report, page 5-6 (Attachment 1).

sporting events that attract large crowds". This statement is erroneous and fails to even recognize the use of Safeco Field for events other than sporting events or even the existence of the Qwest Event Center and WaMu Theatre which are immediately adjacent to Royal Brougham. Coordination of noisy construction periods around these events must be addressed. Both stadiums also house the business functions of the sports teams similar to any other business with marketing, accounting, purchasing, human resources and operations departments functioning throughout the year. We agree that the use of sound walls is inconsistent with facilities of this type, but selection of materials and surfaces should include review to ensure that noise does not resonate from the project into the ballpark.

6

It is noted in the EA that one of the proposed methods to mitigate noise is to pursue work between the hours of 7am and 10pm. Those hours tend to conflict with event hours whether baseball or non-sporting events. Consequently the scheduling of work must be coordinated to times and days that will avoid conflicts with events.

7

During Phase I oscillating equipment was used in place of impact-driving equipment in the ballpark service compound. This substantially reduced the amount of noise and vibration experienced in the ballpark.

8

Light and Glare

The EA does not attempt to address the potential adverse impacts of light and glare that could spill over into the ballpark from the Royal Brougham ramp. This issue must be addressed. Headlamps from trucks or autos moving down the ramp could create a distraction for ballplayers on the field. Distractions of that type have been known to cause accidents on the field which result in injuries. This problem can be mitigated by ensuring that barriers are tall enough and solid enough at specific locations to prevent this type of spill over.

9

The placement and proper selection of stationary street lighting will also avoid unacceptable glare on the playing field. Augmented shielding of stationary streetlighting at specific locations will prevent this type of spillover.

10

Land Use

The EA does not properly acknowledge the Stadium Transition Overlay District ("STOD") as the land use designation for the project area. This District was created by City of Seattle ordinance and establishes different zoning criteria and requirements from the underlying industrial zoning. The STOD must be acknowledged and the zoning criteria and requirements both understood and incorporated into the EA where appropriate. While the colloquial term "SODO" has been loosely applied to the area (and has been used extensively in the EA), it is not a legally recognized designation for land use purposes. The term "SODO" is used mostly by the commercial/retail business association south of the ballpark to distinguish itself from the industrial DMIC association.

11

Response to Susan K. Ranf, Seattle Mariners:

6. WSDOT will comply with City of Seattle noise ordinance requirements and implement traffic management plan provisions to ensure that noise levels remain within appropriate thresholds in the hours before, during, and after events at the stadiums and event center. At other times, WSDOT will comply with City of Seattle daytime noise restrictions.
7. Please see our response to Summary Comment 1. WSDOT is committed to consulting and coordinating with the stadium facilities to minimize construction-related disturbances in the hours preceding, during, and following events.
8. The types of equipment used during construction will be determined during the design-build process and will meet City of Seattle noise requirements.
9. Light spillover onto the playing field of Safeco Field from headlights of vehicles traveling west on either the I-90 off-ramp to South Atlantic Street or the South Royal Brougham Way railroad overpass is unlikely under the project configuration and level of design shown in this EA. Glare from vehicles reaching the playing field is also unlikely as is spillover from project street lights. The elevations of the ramps that the vehicles would be traveling on as described in this EA would not be high enough to create spillover or glare onto the playing field. It should be noted that spillover related to vehicles traveling on the structures that are ultimately built (which might vary in detail from the EA descriptions) cannot be completely ruled out. These issues will be considered during the design-build project review process that will take place between WSDOT and the relevant stakeholders. In the unlikely event that vehicle lights or glare are noticeable from the playing field with the structures that are ultimately built, a number of simple and effective design solutions (such as banners or screens) could be developed that would integrate well with the overall character of the area. This text has been added to the EA Visual Quality section on EA page 5-148 (Attachment 1).
10. WSDOT will apply light shielding to street lights on South Royal Brougham Way that are visible from the playing field area of Safeco Field.
11. The Land Use section of EA Chapter 5, The Environment, has been revised (Attachment 1) to provide more information on the Stadium Transition Area Overlay District (STOD). Where appropriate, the term "STOD" has replaced the term "SODO" to provide the correct formal designation for the area.

12 The EA properly identifies Safeco Field as being within the project area, along with Qwest Field and Event Center and vaguely references “parking uses”. The EA should be more specific regarding the referenced “parking uses”. The largest of the parking facilities, shared under covenants by the two stadiums, are integral to the successful operation of both, as both are regional sports and entertainment facilities drawing spectators from the entire northwest U.S. and western Canada. While both facilities can be used for parking other than event parking, during large events adequate access to these and other parking facilities is important to reducing traffic congestion. Safeco Field needs access to approximately 14,400 parking spaces for a baseball game with attendance of 47,000.

13 It should be noted that there are several errors on the land use designations on Exhibit 5-17, including the portrayal of Occidental Avenue as existing between Atlantic and Royal Brougham. That portion of Occidental Avenue was vacated by the City of Seattle by ordinance approximately ten years ago and is currently integrated into the ballpark

14 Exhibit 5-18 fails to show the Stadium Transition Overlay District, instead showing only the underlying zoning. On page 5-68, the comment is made in the last paragraph “*Past projects such as Qwest Field, Qwest Field Event Center, Safeco and the restaurants have contributed to the growth of non-industrial uses in the study area, making it less conducive to sustained industrial use.*” This statement fails to acknowledge the intent of the STOD to create a pedestrian environment and the intent of the STOD to encourage non-industrial uses. The paragraph further states “*By improving freight movement, the project could help to offset this effect, making it more likely that industrial and freight-dependent businesses will remain in the area.*” While the intent of that paragraph might apply to the larger Duwamish MIC, it does not apply to the portion of the study area which is within the STOD. The statements made above appear ignorant of, if not contrary to, existing zoning ordinances.

Transportation

15 As in other sections of the EA the term “SODO” has been used to describe elements such as the E3 Busway which has been mis-identified as the “SODO Busway”, see page 5-102.

16 We cannot stress enough that while Safeco Field is a ballpark we host hundreds of non-baseball events each year. Overall attendance at baseball games is much higher than non-baseball events, however, non-baseball events generate more traffic per attendee since the majority of these events have one or two occupants per vehicle compared to the 3+ for baseball. So while the statement on 5-109 regarding sporting events being the “*main types of events*” from a total attendance standpoint, from a traffic generation standpoint the non-baseball events are of potentially more consequence to traffic congestion and should not be ignored.

Response to Susan K. Ranf, Seattle Mariners:

12. A statement has been added to the EA on page 5-128 (Attachment 1) that area parking facilities are used to capacity during events at the stadiums and event center, and that it is not anticipated that the project will affect the use of these facilities.

13. EA Exhibit 5-17 has been revised (Attachment 1) to remove the depiction of Occidental Avenue South between South Atlantic Street and South Royal Brougham Way. The exhibit has also been revised to portray Occidental Avenue South in its correct configuration between South Atlantic Street and South Holgate Street (Attachment 1).

14. EA Exhibit 5-18 does include the Stadium Transition Area Overlay District. The accompanying text has been revised (Attachment 1) to acknowledge the intent of the STOD to encourage a pedestrian-friendly environment and compatibility with non-industrial uses.

15. The EA text has been revised (Attachment 1) to refer correctly to the E3 Busway.

16. The EA text on page 5-109 has been revised (Attachment 1) to acknowledge that non-sporting events also generate substantial volumes of traffic.

17 On page 5-109 the statement is made that “*much of the on-street parking is blocked off during large events*” is erroneous. Particularly for Safeco Field, the only parking that is blocked off is First Avenue in front of the ballpark, a portion of the east side of First Avenue between Atlantic and Massachusetts after the start of evening or weekend games only, and a small section of the east side of Third Avenue directly under the Edgar Martinez Drive overpass. The total number of spaces lost is less than 60, hardly constituting “much” of the available parking in the study area.

18 On page 5-110, the average attendance number for Safeco Field is erroneous, representing only attendance for the 2007 baseball season. Since the ballpark was built the average attendance number has been approximately 37,000, which equates to about 1300 additional cars coming into the area per game on average.

19 On page 5-112 a statement is made that there are street trees along First Avenue. It should be noted that there are no trees along First Avenue South of Atlantic on the east side of the street. It is also noted on the same page that the sidewalks on First Avenue south of Royal Brougham are “*separated from vehicle traffic*” near Atlantic which is a misstatement and needs to be corrected unless trash cans and streetlights are considered a valid form of separation.

20 On page 5-120 the last paragraph seems to imply that the intersections of Atlantic at Utah and Atlantic at Occidental are signalized, which is not true.

21 On page 5-124 the statement is made “*Sidewalks along the north side of South Atlantic Street will be closed and a protected walkway provided.*” This is a very generalized statement and is of great concern as it seems to imply that the closure would be for the duration of the project. That sidewalk is an important ingress/egress route for the ballpark. The timing and duration of any proposed closure needs to be clarified as it could create significant impacts on operations planning and staffing for the ballpark.

22 On page 5-124 exhibit 5-41 shows the project being completed in three phases, which would reduce the impacts on the operation of the stadiums. It needs to be noted that conversations recently held on March 4, 2007, indicate that WSDOT is considering doing all phases at one time. This would create an untenable situation for the ballpark as it would restrict access – both vehicle and pedestrian – so completely. This option must not be given further consideration if only because it would create an unsafe environment.

23 On page 5-128 the statement is made in the paragraph on event traffic that Royal Brougham Way is closed before events. This is not true for events at Safeco Field. Before ballpark events Royal Brougham and Atlantic are both open to through traffic. However, both Royal Brougham and Atlantic are closed to through traffic post-event.

24 On page 5-132 the statement is made that WSDOT will coordinate to minimize congestion during non-sporting events at Qwest Event Center but there is no statement that the same provisions will be made for similarly large events at Safeco Field. This must be addressed.

Response to Susan K. Ranf, Seattle Mariners:

17. The EA text on page 5-109 has been revised (Attachment 1) to describe event-related parking restrictions in a manner consistent with the comment.

18. In Exhibit 5-35 on EA page 5-110, the average number of attendees at Safeco Field Seattle Mariners baseball games has been revised from 33,000 to 37,000 (Attachment 1).

19. The text on EA page 5-112 has been revised (Attachment 1) to accurately describe plantings and sidewalk configurations along the relevant portions of First Avenue South.

20. The relevant paragraph on EA page 5-120 has been revised (Attachment 1) to remove the unintended implication that the intersections of South Atlantic Street with Utah Avenue South and Occidental Avenue South are signalized.

21. The text on EA page 5-124 has been revised (Attachment 1) as follows: "Sidewalks along the north side of South Atlantic Street will be closed temporarily and a temporary walkway provided for the safe passage of bicyclists and pedestrians. The walkway will provide safe passage around the immediate construction zone associated with connecting the new I-90 off-ramp to the existing South Atlantic Street overpass. The walkway will not extend far enough west on South Atlantic Street to interfere with pedestrian access to Safeco Field, its ticket booths, or other amenities."

22. Exhibit 5-41 on EA page 5-124 is correct. The project will be completed in three phases as shown.

23. The referenced paragraph on EA page 5-128 has been corrected.

24. The referenced statement on EA page 5-132 has been revised (Attachment 1) to read as follows: "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."

25 On page 5-134 in the second paragraph on event traffic the statement is made that mitigation could include requiring traffic exiting Qwest Garage to turn right (east). This measure would be consistent with the existing post event exiting plan from Qwest Garage for ballgames and we would anticipate it would be continued to avoid having vehicles entering the heavy pedestrian congestion area at Occidental.

26 On page 5-135 the statement is made that Metro buses could line up on the Royal Brougham ramp. All Metro to the Mariners buses must be able to carry disabled passengers and therefore must be loaded in flat locations where wheelchair lifts can be used. This location should not be given further consideration.

27 On page 5-135 the final paragraph again uses the term "SODO area" inappropriately. The Livable South Downtown (LSD) plan potentially impacts the STOD but the LSD planning area stops at Holgate and is not a comprehensive plan for the area south of the ballpark frequently referred to as "SODO". This statement is completely erroneous and misleading. This continues to the next page where there is reference to the Duwamish Manufacturing and Industrial Council (DMIC) planning document but no reference to the STOD, a unique zoning area created by city ordinance.

28 On page 5-143 the statement regarding sensitivity to the visual components of the project by stadium and event center patrons is underestimated to be "medium". Because of the semi-open structure of the ballpark, the cautious placement of illumination, and the shielding of vehicle lights so that they do not affect the playing field will be of significant concern to baseball fans as will whether the structure provides an inviting gateway to the ballpark or appears to create a barrier to the ballpark. When the ballpark was designed the exterior was specifically designed to resemble exteriors of factories from the late 1800s to blend with and compliment the existing historic and industrial buildings in the area remaining from the 1800s. Maintaining this feeling is important to the visual perception of visitors to the area. It is again important to note that the term "SODO area" has been inappropriately applied to the STOD in this section.

29 It should be noted that Qwest Field and Qwest Event Center have been erroneously identified as "Quest" Field and "Quest" Event Center at several points in this section.

30 Page 5-159 refers to the cumulative effects of the multiple road projects planned for the area around Safeco Field. We again point out that the ballpark is not located in "*the SODO neighborhood*". The use of this term continues to present an erroneous picture of the relationship of the ballpark to the area, especially the statement that the DMIC plan "*consistently emphasize industrial activities as the preferred and dominant land use within the area.*" The STOD, a legally applied land use designation, specifically identifies office and other business types that would support and compliment the stadiums as the preferred land use in the STOD. While we do not disagree with the need to protect the industrial lands outside of the STOD, we do disagree with the persistent statements in the EA document that the non-industrial growth in the area where the

Response to Susan K. Ranf, Seattle Mariners:

25. The referenced statement on EA page 5-134 has been revised (Attachment 1) to state: “During project operation, mitigation measures to relieve traffic congestion could include continuing the existing policy of allowing only left turns for post-event traffic exiting the Qwest Field parking garage. This would direct traffic toward the freeway system to the east and away from the post-event heavy pedestrian congestion area at the intersection with Occidental Avenue South. The Seattle Police Department controls traffic movements before, during, and after events.” The same revision has been made to the Transportation, Operational Mitigation section of the Mitigation Commitment List (Attachment 4).

26. The referenced statement on EA page 5-135 regarding use of the elevated ramp on South Royal Brougham Way for event bus staging during project operation has been deleted from the EA (Attachment 1) and from the Mitigation Commitment List (Attachment 4). During project operation, the City of Seattle will make this determination.

27. The text on EA page 5-135 has been revised (Attachment 1) to include appropriate reference to the Stadium Transition Area Overlay District.

28. WSDOT believes its assessment that the sensitivity of stadium and event center patrons to the visual environment of the study area is appropriately characterized as medium. The term “medium” applied to visual sensitivity is not a description of how appreciative viewers are of design or beauty. It is a qualitative description of how likely viewers are to notice and be concerned with changes to the viewed environment. People who are engaged in other activities (such as working or watching a baseball game) are usually focused on the activities they are engaged in and on the setting (their work place or the ball park). They are usually not as aware or concerned with changes to the visual environment outside of where their activity is occurring. Patrons passing through the project area on their way to or from events certainly notice the neighborhood they are passing through, but their level of attention or familiarity with it would not be as high as that of a neighborhood resident. Patrons would not be expected to notice and be concerned by changes in the area to the degree that people with high viewer sensitivity (such as residents) would likely be. The text of this section has been revised (Attachment 1) to include recognition of the Stadium Transition Area Overlay District.

29. The single misspelling of “Qwest” in the document (p. 5-144) has been corrected (Attachment 1).

30. Portions of EA Section 5.13, Cumulative Effects, on pages 5-159 through 5-161 have been revised (Attachment 1) to give appropriate recognition to the Stadium Transition Area Overlay District designation and its planning goals.

SR519 project is to be built is somehow inconsistent with existing public policy which is clearly not the case. This mischaracterization continues to page 5-161.

31 Exhibit 5-55 identifies several proposed or in-process public projects in the area, but includes only one commercial development, along Atlantic Street. This geographic area includes a significant number of other commercial developments either in process or in planning that should have been identified. This would include the Starbucks project on First Avenue South of King Street (in construction now), the Qwest North Lot development on King Street, the Johnson Building redevelopment on First Avenue, the proposed redevelopment of the eastern portion of the WOSCA site that remains as private property and the proposed "over the tracks" development west of 4th Avenue and north of Royal Brougham. None of those projects, except the "over the tracks" project, are part of the Livable South Downtown study and as such they are all allowed under current zoning, and all will be significant contributors to the cumulative impacts in the area.

32 We cannot express strongly enough our concern that WSDOT must be proactive in planning the SR519 project to incorporate the highest level of mitigation and best management practices to protect the public investment in Safeco Field. We believe that it is reasonable for the DNS to be reopened and EA modified to incorporate specific mitigation measures that will address our concerns.

Sincerely,



Susan K. Ranf
Director of Transportation

Cc: Bart Waldman, EVP and General Counsel, Seattle Mariners
Melody McCutcheon, attorney, Hillis Clark Martin and Peterson
Thomas Backer, attorney, Public Facilities District

Response to Susan K. Ranf, Seattle Mariners:

31. EA Exhibits 5-54 and 5-55 and the text on EA pages 5-161 and 5-166 have been revised (Attachment 1) to include several privately funded commercial developments as reasonably foreseeable future actions. The added projects are cases in which the developments are presently under construction or already permitted and approved for future development.

32. WSDOT will provide appropriate mitigation measures for effects related to activities at Safeco Field. WSDOT does not anticipate reissuing the SEPA DNS. Mitigation measures are included in Attachment 4 of this FONSI.



Gregory J. Nickels, Mayor

Seattle Department of Transportation

Grace Crunican, Director

March 7, 2008

Allison Hanson
Deputy Director of Environmental Services
Urban Corridors Office
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Dear Ms. Hanson:

Thank you for the opportunity to review and comment on the SR-519 Intermodal Access Project Phase 2: Atlantic Corridor Environmental Assessment (EA). This letter is in response to the NEPA EA issued on February 5, 2008 and the SEPA Notice of Adoption and Declaration of Non-Significance (DNS) issued the same day, amended to extend the SEPA comment deadline to coincide with the NEPA comment deadline.

The City of Seattle is an active project participant with WSDOT and FHWA in this project and is supportive of the current proposal. We continue to work with WSDOT and FHWA in refining design and other elements while maintaining the project's budget and aggressive schedule.

This comment letter consists of two parts. The first focuses on general issues that have been identified in our review of the EA. The second part presents specific page-by-page comments on the EA and its technical appendices, some of which are also discussed in the first part of our comments. City staff is available to discuss the specifics of our comments at any time. We look forward to working with WSDOT and FHWA on resolution of any remaining issues and moving the project ahead.

A. GENERAL COMMENTS

1. Mitigation Commitments

1 There is an inconsistency in the discussion of mitigation measures in the EA, Appendix B and the technical appendices to the EA. In some instances, there are firm commitments to specific mitigation measures; in others, there are lists of potential measures without either a firm commitment to implement or a discussion of what would trigger



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Response to Robert M. Powers, City of Seattle Department of Transportation (SDOT):

1. Please see our response to Summary Comment 1 on page A5-2.

Page 2 of 21

implementation of a specific measure. Appendix B in particular is prefaced by the statement that “(t)his appendix summarizes best management practices (BMPS) and mitigation measures that could be used to avoid or minimize undesirable effects of the project during construction.” (emphasis added.) This provides very little to assist permitting agencies, affected parties or the general public in determining what WSDOT intends to do to mitigate impacts of constructing this project.

Statements such as “construction documents might also require that stockpiles of imported earthfill and aggregate are either covered or surrounded by silt fences, ...” are not particularly helpful, especially given the project’s quick schedule and the development of the Designer-Builder RFQ/RFP currently underway. This RFQ/RFP process requires knowing mitigation measures sooner rather than later. The EA should be the appropriate place to detail these measures.

In a number of cases, the need for specific mitigation measures is clear in response to the stated impacts of the project. In the page-specific comments that follow, we note some specific examples of where mitigation commitments should have been made in the EA document.

2. Event traffic management

The EA is inconsistent in its discussion of event traffic management during construction.

2a There are numerous references to event traffic management in the EA. Some state that there will be no construction before and after events at the stadiums; other references state that there will be no construction during events. Some references seem to imply all events at the facilities (including the exhibition center), while others refer just to the stadiums.

Event traffic, both vehicular and pedestrian, is a major issue in the project area, and keeping traffic moving and pedestrians and bicyclists safe during construction is critical. WSDOT and the contractor should work closely with SDOT Traffic Operations to

2b develop and implement a traffic management plan for all time-specific major events (15,000 projected attendance or greater). Construction activities that close lanes (including parking lanes) from two hours prior to such events until two hours following such major events will likely be prohibited. Sidewalks and crosswalks will likewise need to be open and passable during these timeframes as well.

Response to Robert M. Powers, SDOT:

2a. In the EA, discipline reports, and technical memoranda, references to construction activities “during” stadium-area events have been revised to “before, during, and after” (Attachment 1). A statement has been added to the Event Traffic and Parking Management section of the EA (page 5-128) that “Some construction will occur in the hours before, during, and after stadium-area events, but it will be appropriately limited and coordinated with King County, the City of Seattle, and the relevant facilities” (Attachment 1).

2b. Please see our response to Summary Comment 1 on page A5-2. The traffic management plan will include provisions for WSDOT to coordinate with the City of Seattle and the appropriate facilities prior to special events.

Page 3 of 21

2c The staging of post-event bus services will be disrupted by construction activities and by the long-term operation of the Phase II project. WSDOT should work with both SDOT Traffic Operations and King County Metro to appropriately site such post-event transit services in a way that will continue to encourage event attendees to use public transit to and from events.

3. Design and Visual Quality

3 Urban Design and Visual Quality of these corridors are critical to the urban setting which this project will be built. As such, the project will be required to meet with the City and the City of Seattle Design Commission to acquire urban design and visual quality approvals. It is the City of Seattle's expectation that the design and visual quality elements scoped in the SR519 Phase II Project will be funded by WSDOT within the project budget.

4. Pedestrian Elevator on Royal Brougham Way

4 This elevator is currently shown as an "optional" facility adjacent to Safeco Field on the west side of the railroad crossing. This elevator should be firmly committed to, since it is essential in providing ADA access across the railroad crossing.

5. Traffic signal at 1st/Massachusetts

5 The EA indicates that the intersection of 1st and Massachusetts will meet signal warrants. Therefore, the project should install a signal at this location. WSDOT should coordinate with SDOT's Signal Operations group in the implementation of this measure.

6. 4th Avenue Sidewalk north of Royal Brougham Way

6 The sidewalk on the west side of 4th Avenue South from the touchdown ramp south to S. Royal Brougham Way was removed by the SR-519 Phase I project. This was done to allow for railroad expansion. This expansion is now complete and WSDOT should now install the sidewalk and the pedestrian crossing on the west side of the touchdown ramp as part of the Phase II project.

7. Seattle Fire Department concerns

7a In the event of a major emergency at either of the stadiums or at the Qwest Event Center, emergency services (fire, medical aid and police) need to have as many options of reaching the emergency as possible, especially given the few east/west and north/south access points. Therefore, a street-level access for emergency response across the rail tracks at Royal Brougham must be provided. This emergency crossing must include gates and an automatic train warning systems along the tracks to ensure rail operators are

Response to Robert M. Powers, SDOT:

- 2c. WSDOT will coordinate with King County Metro Transit and the Seattle Department of Transportation to facilitate efficient post-event bus staging during construction.
3. 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.
4. As stated on EA pages 4-1 and 4-4, WSDOT will ensure that all project improvements, including pedestrian access to and from the elevated structure above South Royal Brougham Way, comply with the Americans with Disabilities Act of 1990 (ADA). The means of ADA-compliant access to and from the elevated structure will be an elevator, with the location and other details to be determined in consultation with the City of Seattle and other agencies and stakeholders during the design-build process.
5. Please see our response to Summary Comment 3.
6. The issue of the Fourth Avenue sidewalk north of South Royal Brougham Way is outside the scope of the SR519 Phase 2 EA. WSDOT and City of Seattle are discussing this issue through other venues.
- 7a. Please see our response to Summary Comment 2.

Page 4 of 21

aware of the closure of the crossing by emergency services. The EA should be consistent in its discussion of the emergency at-grade access on S. Royal Brougham Way at the BNSF. In emergency situations, there will be a need to ensure emergency responders can evacuate occupants across the rail track with close cooperation of rail authorities.

7b The installation of the 'ramp' between Safeco and Qwest exhibition hall on Royal Brougham creates a likely impediment to emergency egress. Additionally, the SFD believes the stairs will not handle the expected crowd surge from a mass emergency evacuation. Therefore, the Seattle Fire Department wants an egress analysis and evaluation to ensure exiting can be met under worst case scenarios.

7c The Department is concerned that the stairs may create a fall hazard for westbound pedestrians during crush periods, since pedestrians cannot see the drop off of the stairs during large crowds.

7d Signal pre-emption for emergency vehicles will be needed during construction and post-construction to ensure that emergency response times are not hampered. Royal Brougham will continue to be a primary response route due to proximity to the stadiums and the event center.

7e The design and construction specification should clearly provide and maintain a fire apparatus access lane(s) having an unobstructed width of not less than 20 feet within 150 feet of all portions of the perimeters of Safeco Field and the Qwest Field and Event Center.

7f The design of the elevated roadway should include fire hydrants in accordance with the Seattle Fire Code amendments to NFPA 502.

B. SPECIFIC PAGE-BY-PAGE COMMENTS

SUMMARY (CHAPTER 1)

8 Page 1-3: 1st and 3rd paragraphs; the EA indicates in several locations that the construction schedule for the project will be from 2009 to 2012. The latest estimate, based on the alternative contracting method, has construction anticipated to start in August 2008 and be completed by December 2010. The EA should be consistent with expected construction window used by the project team.

Response to Robert M. Powers, SDOT:

7b. WSDOT will coordinate with the Seattle Fire Department regarding emergency egress concerns at Safeco Field and Qwest Field Event Center.

7c. The stairs to and from the South Royal Brougham Way elevated structure will be designed to meet all applicable safety standards, including signage.

7d. The issue of signal preemption for emergency response vehicles during project construction will be resolved by WSDOT and the City of Seattle during project design. During project operation, WSDOT will continue any signal preemptions that exist today.

7e. Per previous meetings with the Seattle Department of Transportation and the Seattle Fire Department, the agencies communicated that the minimum fire apparatus access lane width was 12 feet, and the project meets this minimum. WSDOT will provide a street lane width of about 16 feet to the curb, with about 18 to 20 feet of sidewalk.

7f. Fire hydrants will be installed in accordance with the City of Seattle Fire Code, with specific numbers and locations to be determined through further coordination with the Seattle Fire Department.

8. The EA text and schedule have been revised (Attachment 1) to show project construction starting in the fall of 2008.