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June 8, 2004

HAND DELIVERED

Ms. Allison Ray
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, Washington 98104

Re: Comments on SR 99: Alaskan Way Viaduct and Seawall Replacement Project,
Draft Environmental Impact Statement

Dear Ms. Ray:

L-011-001

The Washington State Major League Baseball Stadium Public Facilities District (PFD) appreciates the opportunity to review and comment on the draft Environmental Impact Statement ("draft EIS") for the SR 99 Project (the "Project"). While the PFD is supportive of the transportation and infrastructure improvements to be provided by the Project, the PFD is concerned that the draft EIS does not adequately analyze alternatives, impacts and mitigation measures for portions of the Project. In particular, the PFD is concerned that reasonable alternatives have not been considered for the overcrossings and connections from the Project to SR 519 at S. Atlantic St. and S. Royal Brougham Way, and to the current Port of Seattle Terminal 46. In addition, the impacts of these connections have not been adequately evaluated, both during the construction phase and during operations. Finally, design alternatives or mitigation measures for reducing the significant impacts that will result from these connections immediately adjacent to the pedestrian rich environment of Safeco Field have not been adequately considered.

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The PFD believes that these omissions are serious and need to be corrected in the final EIS if that document is to meet the standards established in the State Environmental Policy Act (SEPA). The PFD is willing to work with the Project proponents on these issues and encourages direct discussion between Project staff, the PFD and the Seattle Mariners on these topics. While there has been substantial public input and opportunity for comment on the central and

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Since the publication of the Draft EIS in 2004, a separate project was completed to address the concerns in this comment. The second phase of SR 519 improvements included the Royal Brougham Way Bridge and the I-90/I-5 off-ramp to S. Atlantic Street. These improvements eliminated the remaining safety issues related to surface-level rail crossings on Royal Brougham Way, and provide safe and efficient waterfront and stadium access for drivers and freight haulers.

Numerous measures to reduce the construction impacts on traffic in the project corridor, and specifically in the stadium area, are described in Appendix C, Transportation Discipline Report, construction mitigation section.

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Please note that SR 519 was a separate project with independent environmental analysis. The alternatives developed and evaluated for this project have explored a reasonable range of configurations in the south end of the project that meet the project's purpose and accommodate surrounding activities.

L-011-002 waterfront segments of the Project, additional attention needs to be paid to the south segment and its connections to the surrounding community.

Additional information about the PFD's concerns is provided below. The PFD also joins in the detailed comments submitted by the Seattle Mariners on the Project.

L-011-003 • **Reasonable Alternatives to the Overcrossings and Connections from the Project to SR 99 and the Current POS T-46 Must be Evaluated.**

On July 15, 2004, Safeco Field will celebrate its 5th year anniversary of operations. In each full year of operation, the ballpark has attracted more than 3 million fans to attend the 81 home baseball games. In addition, tens of thousands more people attend other events at the ballpark each year. All told, there are more than 100 days of baseball games or other major events at Safeco Field every year, and the number of events is increasing.

Fan attendance at ballgames and other events at the ballpark produce a very high level of pedestrian and vehicle traffic both before and after events. The streets immediately surrounding the ballpark (in particular S. Royal Brougham Way and Atlantic Street S.) are subject to direct police control. These streets are highly congested with traffic and with pedestrians both before and after games and major events at the ballpark.

The SR 99 Project proposes to provide connections between SR 99, I-5 and I-90 by building aerial overcrossings of, or interchanges with, SR 99 that would place traffic at grade right at the two main entrances to Safeco Field: the home plate entrance at First Ave. S. and S. Atlantic Street and the left field entrance at First Ave. S. and S. Royal Brougham Way.

The PFD is concerned that these connections will prove to be unworkable more than 100 days each year due to the pedestrian and traffic congestion related to events at Safeco Field. The PFD believes that reasonable alternatives for providing connections between SR 99, I-5 and I-90 should be evaluated.

In addition to the impacts mentioned above, another reason for evaluating alternatives is the continued evolution of the properties and land uses adjacent to the ballpark. In particular, the Port of Seattle's Terminal 46 is subject to growing uncertainty as to its future use and development. The terminal is currently used by Hanjin as part of its container shipping operations, but there is uncertainty regarding how long that use will continue (the current lease expires in 2010). There are also preliminary proposals circulating for a major change in use from port facilities to residential/commercial development. This is significant, because it changes the underlying premises (e.g., freight mobility) for the connections.

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Phase 1 of the SR 519 Intermodal Access Project added a new grade separation at S. Atlantic Street to provide grade-separated access in the eastbound direction between First and Fourth Avenues S., I-90, and I-5. Phase 2 of the SR 519 Intermodal Access Project, completed in spring 2010, added a corresponding westbound connection. Construction has started on the S. Holgate to S. King Street Viaduct Replacement Project. This project is part of the Alaskan Way Viaduct and Seawall Replacement Program. The S. Holgate to S. King Street Viaduct Replacement Project will build a new section of SR 99 that will have three lanes in each direction south of S. Royal Brougham Way and new on- and off-ramps near the stadiums. A new S. Atlantic Street overcrossing will improve connections between the Port of Seattle and major freeways by allowing traffic to bypass passing trains.

The ramps associated with the interchange in the stadium area replace the Railroad Avenue ramps between SR 99 and First Avenue S. today. Therefore, the traffic that will use these ramps is already traveling through the intersections in question on First Avenue S. The reconfigured interchanges in the SR 99 corridor (west of First Avenue S.) should help redistribute traffic somewhat away from First Avenue S. that normally would continue north to the Railroad Avenue S. ramps. Please see the Final EIS Chapter 5 for description of the proposed improvements in the stadium area. Also please see Appendix C, Transportation Discipline report.

It is likely that police traffic enforcement will continue to be needed on game days well beyond completion of the project. Current staging of the baseball games and especially day games generate increased demand in the area with the evening peak hour commute. Transit service and demand management strategies will continue to be needed to help reduce auto traffic in the area, but they would not completely solve the traffic congestion problems.

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The PFD is supportive of the need for connections between these major roadways, and it recognizes that it is one of the direct beneficiaries of these connections. But the PFD also believes that it is time for a thorough review of the transportation needs in this area, including reasonable alternatives to the connections proposed in the SR 99 Project draft EIS. There is more than \$1 billion in public investment reflected in Safeco Field and the Seahawks Stadium and Exhibition Center, and the PFD is concerned about diminishing the value of that public investment by running freeway on-ramps immediately adjacent to and between those facilities. An analysis of additional alternatives should be part of the final EIS.

L-011-004

- **The Impacts of the Project on the Area Surrounding Safeco Field have not been Adequately Evaluated.**

The draft EIS discusses at length the construction and operational impacts of the SR 99 Project, at least with respect to the central and north waterfront portions of the project. The draft EIS fails, however, to adequately analyze the impacts resulting from the construction and operation of the south portions of the Project, including the aerial overcrossings that will directly impact Safeco Field. If the south portion of the Project were an independent project, far more detail analysis of impacts and mitigation measures (both during construction and operation) would be provided than is included in the draft EIS.

For example, the draft EIS discloses that overall Project construction could last between 7.5 and 11 years, not including the year-and-a-half for utility relocations at the beginning of the Project. But there is little discussion of how construction impacts during this decade plus period will affect Safeco Field and the surrounding area and how those impacts will be addressed. In particular, while there are detailed drawings and photo simulations of the impacts of some of the temporary construction "fly-over" for the central portion of the project, no visual simulations are provided for the permanent aerial overcrossings adjacent to the ballpark. View protection from the ballpark has been and will continue to be an important issue for the PFD. This is just one example of the kind of impacts on Safeco Field from the Project that should be evaluated in the final EIS.

L-011-005

- **Design Alternatives or Mitigation Measures for Reducing Significant Impacts on and around Safeco Field Must be Evaluated.**

The final EIS should include detailed analysis of design alternatives or mitigation measures that will reduce the impacts of the Project on and around Safeco Field. These might include measures specifically designed to reduce the construction impacts of the Project and other measures to reduce operational impacts. For example, as noted above Safeco Field is a pedestrian rich environment. The final EIS should include design alternatives or mitigation measures to ensure that pedestrians traveling to and from

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The 2004 Draft EIS evaluated one construction plan that considered brief closures of SR 99 during construction, but otherwise assumed that at least two lanes would be provided in each direction on SR 99 or an alternate detour route. In comments received on the 2004 Draft EIS, many people asked the lead agencies to consider more than one construction plan. Specifically, many people wanted to know if closing the corridor would reduce the amount of time it takes to build the project. To respond to this question, three different construction plans were developed (a shorter construction plan, an intermediate construction plan, and a longer construction plan) and evaluated in the 2006 Supplemental Draft EIS. Since 2006, the Cut-and-Cover Tunnel and Elevated Structure Alternatives and the construction approach for each of the alternatives have been refined. One construction plan is analyzed for each of the alternatives (Bored Tunnel, Cut-and-Cover Tunnel, and Elevated Structure) in the Final EIS. Chapter 3 describes each alternative and its construction plan, and Chapter 6 describes construction effects.

Construction has started on the S. Holgate to S. King Street Viaduct Replacement Project. This project is part of the Alaskan Way Viaduct and Seawall Replacement Program. The S. Holgate to S. King Street Viaduct Replacement Project will build a new section of SR 99 that will have three lanes in each direction south of S. Royal Brougham Way and new on- and off-ramps near the stadiums. A new S. Atlantic Street overcrossing will improve connections between the Port of Seattle and major freeways by allowing traffic to bypass passing trains.

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The Final EIS Appendix C, Transportation Discipline Report, describes the proposed pedestrian facilities near the stadiums and discusses event traffic. Chapter 6 contains details regarding effects on pedestrian facilities and event traffic during construction.

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Safeco Field or the Seahawks Stadium and Exhibition center can get there safely. How this will be accomplished, given the proposed aerial overcrossings adjacent to Safeco Field, simply is not discussed or demonstrated in the draft EIS. This needs to be corrected in the final.

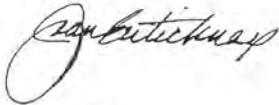
L-011-006

- **The PFD Joins in the Detailed Comments on the draft EIS Made by the Seattle Mariners.**

The Seattle Mariners submitted a detailed comment letter on the draft EIS, raising concerns about the EIS's content but also expressing support for the Project in general. The PFD has reviewed those comments and joins in raising them to the SR 99 Project team for response in the final EIS.

Thank you again for the opportunity to comment. We look forward to working cooperatively with WSDOT and the City of Seattle as they study further the impacts, alternatives and mitigation measures described in this letter. If you would like to arrange a meeting with the PFD, please contact Kevin Callan our Executive Director. Kevin can be reached at (206) 664-3079 or (206) 767-7800.

Sincerely,



Joan Enticknap
PFD Board Chair

cc: PFD Board Members
Kevin Callan, Executive Director
Seattle Mariners
Steve Pierce, City of Seattle

Pedestrian access would be maintained at all times during construction, although at times it may be necessary to reroute pedestrians using temporary facilities/detours designed to minimize user inconvenience. The Transportation Discipline Report contains proposed mitigation measures to reduce construction effects, including in the stadium area. These mitigation measures may be refined as construction plans evolve.

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Your agreement with the comments submitted by the Seattle Mariners is acknowledged. The responses to the Seattle Mariners comment letter can be found in item B-008.