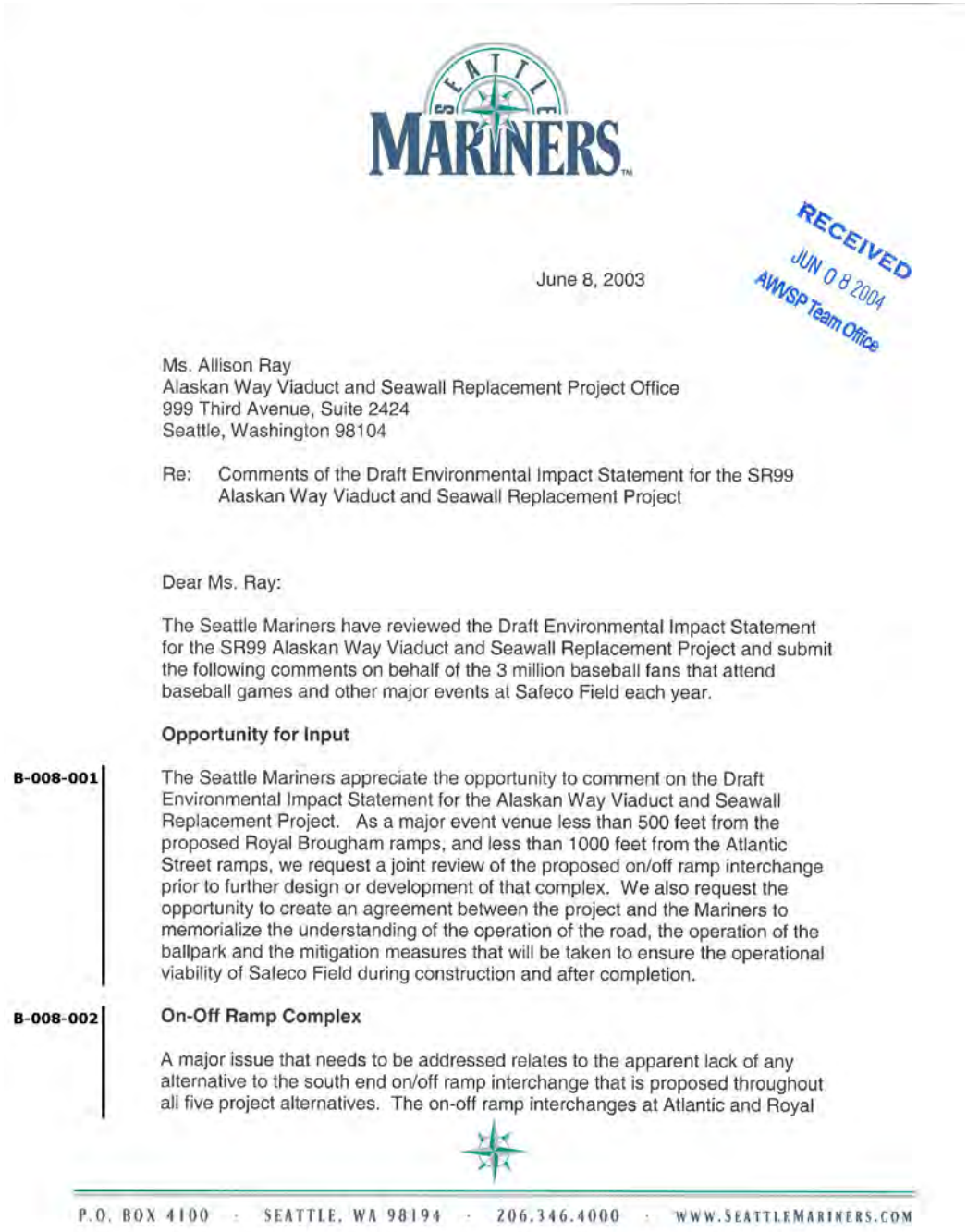

SEATTLE MARINERS

RECEIVED
JUN 0 8 2004
AWVSP Team Office

June 8, 2003

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

Re: Comments of the Draft Environmental Impact Statement for the SR99 Alaskan Way Viaduct and Seawall Replacement Project

Dear Ms. Ray:

The Seattle Mariners have reviewed the Draft Environmental Impact Statement for the SR99 Alaskan Way Viaduct and Seawall Replacement Project and submit the following comments on behalf of the 3 million baseball fans that attend baseball games and other major events at Safeco Field each year.

Opportunity for Input

B-008-001

The Seattle Mariners appreciate the opportunity to comment on the Draft Environmental Impact Statement for the Alaskan Way Viaduct and Seawall Replacement Project. As a major event venue less than 500 feet from the proposed Royal Brougham ramps, and less than 1000 feet from the Atlantic Street ramps, we request a joint review of the proposed on/off ramp interchange prior to further design or development of that complex. We also request the opportunity to create an agreement between the project and the Mariners to memorialize the understanding of the operation of the road, the operation of the ballpark and the mitigation measures that will be taken to ensure the operational viability of Safeco Field during construction and after completion.

B-008-002

On-Off Ramp Complex

A major issue that needs to be addressed relates to the apparent lack of any alternative to the south end on/off ramp interchange that is proposed throughout all five project alternatives. The on-off ramp interchanges at Atlantic and Royal

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B-008-001

Thank you for your continued involvement in the project. The project team has continued to work with the Seattle Mariners and the public as the project design has evolved. Please also see the responses to your letter on the 2010 Supplemental Draft EIS.

B-008-002

In June 2010, WSDOT completed the SR 519 S. Seattle Intermodal Access - Royal Brougham Project, which improved mobility and pedestrian safety around SR 519. That project addressed some of the concerns raised in this comment. The construction of the S. Atlantic Street intersection is now part of the S. Holgate Street to S. King Street Viaduct Replacement Project. This project began construction in the summer of 2010. Please see the Final EIS for current information on the ramp configurations in the south project area.

B-008-002 Brougham represent the single most significant change in the SR99 roadway in the south end. Historically, Seattle has been opposed to creating a cross-town connection between SR99 and I5/I90 near downtown. While the connection that would be created is not a freeway, the net effect of having ramps at this location, when viewed in conjunction with the recently completed SR519 Atlantic Street ramp, could be to increase traffic and traffic speeds in what is already a very congested pedestrian environment on event days at Safeco Field. Pedestrian safety is an important issue for the Mariners.

B-008-003 We suggest consideration of an alternative on-off ramp interchange, or a split on-off ramp which would place half of the proposed complex further south. Massachusetts Street should be seriously considered.

Construction Phase Issues

B-008-004 Conditions during construction which may have adverse impacts on Safeco Field which were not adequately addressed in the DEIS include light/glare, noise, vibration, access, safety, congestion and dust.

Light/Glare: Depending upon the time of year that work is undertaken near the ballpark the type of lighting used and its placement at the worksite could result in some spillage and glare into the ballpark. This problem could be mitigated by maintaining direct contact with the Mariners and providing lighting previews whenever worksite lighting is moved to a new location or is redirected.

B-008-005 Noise: During a baseball game noise from the ballpark may or may not exceed noise levels from the project site. For non-baseball events noise from the worksite would probably exceed noise levels for the majority of non-baseball events at the ballpark. In the case of office-occupancy and retail areas along First Avenue noise from the worksite could be problematic. An overriding, monotonous noise of a pile driver could be disruptive to the concentration of players on the field. In the DEIS a suggestion was made that an oscillating system may be used as an alternative to traditional piledriving techniques. That technique was used next to Safeco field during the construction of the SR519 overpass, proved to be very acceptable to the Mariners, and should be considered for the SR99 project.

Vibration: Vibration caused by a pile driving technique would be of concern because of the cumulative effects on ballpark equipment and building integrity. Vibration could be a significant concern for the integrity of the ballpark retractable roof. This issue needs to be adequately studied prior to any work commencing and if it is proven that vibration would be felt in the ballpark adequate measures must be taken by the project to mitigate the problem.

B-008-006 Access: There are two areas of concern with access, pedestrian access and vehicular access. Safeco Field draws approximately 3 million visitors to baseball

B-008-003

A Massachusetts Street interchange was examined during the original screening process as both a stand-alone interchange and as part of an integrated system. The main reasons for not pursuing an interchange at Massachusetts Street include the following:

- The SIG railyard is located between SR 99 and Colorado Street.
- There is a need for a more significant aerial structure (due to the railyard).
- High costs are associated with potential right-of-way and/or rail track relocation.
- It would provide a less direct connection to/from SR 519.

This location is within the S. Holgate Street to S. King Street Viaduct Replacement Project boundaries.

B-008-004

Construction will include coordination with adjacent businesses and residents, such as the Seattle Mariners, to ensure mitigation of construction impacts. Light and glare effects on Safeco Field are likely only if high intensity lighting is located on very high supports. This potential impact can be mitigated by designing construction lighting at an intensity and elevation that will ensure no spillover to seating and playing areas.

B-008-005

Please see Chapter 6 of the Final EIS and Appendix B, Alternatives Description and Construction Methods Discipline Report, for current information on the construction plan for each alternative. No pile driving is currently planned in the vicinity of Safeco Field.

The City of Seattle Department of Planning and Development typically

B-008-006

games each year, plus additional visitors to other public and private events. A fullhouse game represents approximately 14,400 cars coming into the area. According to Washington State Ferries, 3,000 to 5,000 ferry riders' come to each game. Metro to the Mariners provides bus service to approximately 1900 people per game, plus an equal number of riders on regular route service. Charter buses bring greatly varying numbers of fans, but on average approximately 1000 people arrive by charter bus. Sounder Commuter rail brings between 1,000 and 2,000 passengers on Sundays only.

When Safeco Field was developed several conditions were placed on the development. The ballpark was required to provide 3909 onsite or covenanted parking spaces. The City encourages fans to use parking inventory in the CBD and walk to the ballpark. Over 20,000 people walk from the CBD to each full house game, using all available north-south streets. Several of the north-south streets have very narrow sidewalks, consequently the loss of any sidewalk space could create a significant hazard to pedestrians, especially when taken in the context of the additional surface street traffic that is anticipated during construction. The DEIS did not address the issue of pedestrian access to the ballpark from Colman Dock, nor from the CBD.

B-008-007

With regard to vehicular traffic there is concern that the additional congestion anticipated to occur on First Avenue and Fourth Avenue will have a negative impact on the ballpark. This type of impact was previewed after the Nisqually earthquake when traffic backups doubled from the pre-earthquake norm. During construction the competition for road space will increase between fans going to baseball games and commuters going home. This was not discussed in the DEIS. In fact there was virtually no discussion of ballpark traffic issues. That is a major omission when the impacts will be felt no less than 81 times per year.

B-008-008

The second issue with vehicular traffic is the loss of parking in the area. A reduced parking inventory will drive up the price for parking both in the CBD and the miscellaneous parking lots south of Safeco Field. This will impact fans at the lower end of the economic spectrum that rely on low- or no-cost parking to bring their families to baseball games.

B-008-009

A thorough discussion of access needs to occur and agreements reached as to how increased traffic, loss of parking inventory, increased parking costs and additional transit costs will be mitigated, and how adequate and safe pedestrian access will be provided.

B-008-010

Dust: The DEIS identifies dust as a significant issue during construction. Ballpark equipment will potentially be affected by excessive dust. Enjoyment of the fans, even their willingness to attend games in an outdoor venue, could be adversely impacted by fugitive dust. There is no particular discussion of how dust will be controlled during the project. A specific discussion needs to occur between the Mariners and the project team regarding mitigation for the effects of

grants temporary noise variances to construction projects with nighttime work activities if there is no practical means to work within the City noise ordinance. The long duration and unique nature of the Alaskan Way Viaduct Project requires an extended noise variance from the City. Obtaining this type of variance involves a public hearing process that influences the final decisions and stipulations made by the City, which sets forth noise mitigation measures that the contractor is required to meet.

B-008-006

Pedestrian access will be maintained at all times during construction activities. At times, it will be necessary to reroute pedestrians using temporary facilities/detours, but these detours will be designed to minimize any inconvenience. Any sidewalk or the Marion Street pedestrian bridge that would be removed to accommodate construction activities will be replaced with a temporary facility in a nearby location that provides sufficient capacity to accommodate pedestrian demand.

B-008-007

Construction-related effects on traffic in the stadium area have been evaluated in greater detail since the release of the 2004 Draft EIS and are described in the Final EIS. Additionally, Chapter 8 of the Final EIS descibes mitigation measures identified to assist in managing traffic during the construction period.

B-008-008

The lead agencies recognize that businesses along the central waterfront, Western Avenue, and Pioneer Square rely on the short-term parking in the area. The City of Seattle Department of Transportation (SDOT), in coordination with the project, has conducted parking studies as part of the process to develop mitigation strategies and better manage the city's parking resources. SDOT's studies identified a number

B-008-010 dust in the ballpark and potential impacts of dust on ballpark equipment and attendance.

B-008-011 **Operational Phase Issues**

Light/Glare: Post construction light and glare issues are similar to those identified during construction. The placement and intensity of lighting on the replacement structure needs to be reviewed in the context of the seating bowl at Safeco Field to ensure that light/glare do not adversely impact the ballpark.

B-008-012 Access: The comments in the DEIS regarding the proposed interchanges at Royal Brougham and at Atlantic all describe better access for fans going to baseball games. We question that assumption. The placement of an interchange at Royal Brougham and Atlantic will bring new traffic into close proximity of Safeco Field. At no time does the DEIS point out that access to the interchanges for the general traveling public will be significantly impeded by traffic going to or from baseball games. The description of the currently completed SR519 Phase I is inaccurate as it is on Atlantic Street, not on Royal Brougham as described. Baseball games will impact the proposed and existing interchanges no less than 81 times per year. Prior to making any final decision a thorough discussion needs to occur between the project team and the Mariners regarding how traffic will flow before and after ballpark events. Measures to mitigate new traffic impacts and any additional cost of traffic controls caused by the addition of ramps at these two locations will need to be identified and agreements reached regarding responsibility for additional ongoing costs during construction and after completion.

Safety: There is no discussion in the DEIS how the project intends to co-exist with the existing heavy pedestrian traffic going to events at Safeco Field once the SR99 interchanges are opened. For a significant period before and after games the sidewalks around and near the ballpark become congested with pedestrians. The current practice is to close Atlantic and Royal Brougham immediately after games to accommodate these conditions. There is no discussion in the DEIS how the project team envisions this practice continuing. There is no discussion in the DEIS to demonstrate a knowledge of the necessity for street closures and re-routes before, during and after baseball games and other major events at Safeco Field.

Between the opening of Safeco Field in July 1999, and end of the 2003 baseball season, **15,941,063 baseball fans have come to Safeco Field.** We ask that you step back and relook at the proposed ramp interchange in the context of the number of people who require safe and convenient access to Safeco Field. To this end, we urge consideration of Massachusetts Street as the location of the on/off ramp interchange in lieu of Royal Brougham.

of strategies to offset the loss of short-term parking in this area, including new or leased parking and the increased utilization of existing parking. Although the mitigation measures would be most needed during construction, many of them could be retained and provide benefits over the longer term. Specific parking mitigation strategies have not yet been determined, but the project has allocated $30 million for parking mitigation. The parking mitigation strategies will continue to evolve in coordination with the project and community partners. Parking measures under consideration and refinement include:

- Encourage shift from long-term parking to short-term parking
- Provide short-term parking (off-street), especially serving waterfront piers, downtown retail, and other heavy retail/commercial corridors
- Implement electronic parking guidance system
- Provide alternate opportunities to facilitate commercial loading activities
- Develop a Center City parking marketing program
- Use existing and new social media and blog outlets to provide frequent parking updates
- Establish a construction worker parking policy that is implemented by the Contractor

Refer to the Parking Mitigation during Construction section in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS) for additional information.

B-008-009

The lead agencies plan to maintain access to businesses and residences throughout construction. Temporary limitations and any required changes to access during construction will be mitigated to the extent practicable. Mitigation measures for parking, pedestrian and vehicle access, and business assistance are discussed in Chapter 8 of the Final EIS. The project team will continue their coordination and

Thank you again for this opportunity to comment on behalf of baseball fans. We look forward to future opportunities to work with the project team on impacts, alternatives and mitigation measures related to Safeco Field. Our contact for the Seattle Mariners is Susan Ranf, Director of Transportation, (206) 346-4236.

Sincerely,

Clyde H. MacIver
Executive Vice President and
General Counsel

cc: Chuck Armstrong, President, Seattle Mariners
Washington Major League Baseball Stadium
State Public Facilities District
Steve Pierce, City of Seattle

mitigation activities with local businesses and residents, freight/delivery companies, the Port of Seattle, neighborhood groups, and other affected groups.

B-008-010

Mitigation measures for dust (particulate matter) are discussed in Chapter 8 of the Final EIS and Appendix M, Air Discipline Report. Measures include:

- Spraying exposed soil with water or other dust palliatives to reduce emissions of PM10 and deposition of particulate matter.
- Covering all trucks transporting materials, wetting materials in trucks, or providing adequate freeboard (space from the top of the material to the top of the truck) to reduce particulate emissions during transportation.
- Removing particulate matter deposited on paved public roads to reduce mud and resultant windblown dust on area roadways.

The lead agencies will continue coordination and mitigation activities with business, residential, and other affected groups as project construction moves forward.

B-008-011

Lighting, including the intensity and mounting elevation, on SR 99 will be designed to minimize impacts on adjacent uses, particularly Safeco and Qwest Fields. Specific coordination with Safeco Field will be undertaken to ensure that the seating areas are not substantially affected by glare from the roadway light sources.

B-008-012

In June 2010, WSDOT completed the SR 519 S. Seattle Intermodal Access - Royal Brougham Project, which improved mobility and

pedestrian safety, and addressed some of the concerns raised in this comment. Construction of the S. Atlantic Street intersection is now part of the S. Holgate Street to S. King Street Viaduct Replacement Project. This project began construction in the summer of 2010.

Pedestrian access will be maintained during construction of the Alaskan Way Viaduct Replacement Project, although temporary detours will be needed in some locations. Please see the Final EIS for current information on access, pedestrian safety, and mitigation measures.