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December 13,, 2010

Angela Freudenstein
Washington State Department of Transportation (WSDOT)
Alaskan Way Viaduct Replacement Project SDEIS
999 Third Avenue, Suite 2424
Seattle, WA 98104

Email address: gwv2010SDEIScomments@wsdot.wa.gov

Re: Comments on the Second Supplemental Draft Environmental Impact Statement (EIS) for the Alaskan Way Viaduct Replacement Project

Dear Ms. Freudenstein:

The Washington State Major League Baseball Stadium Public Facilities District (PFD) appreciates the opportunity to review and comment on the SR 99 Alaskan Way Viaduct Replacement Project 2010 Supplemental Draft Environmental Impact Statement (2010 SDEIS). We commented on the scope of this 2010 SDEIS in July 2009. We also commented on all of the prior environmental review documents for the project, including the original draft EIS (June 8, 2004) and first supplemental draft EIS (September 22, 2006). We look forward to seeing responses to all of our comments in the final EIS.

The Washington State Major League Baseball Stadium Public Facilities District (PFD) is the public entity that developed and owns the ballpark known as Safeco Field. The PFD is responsible for overseeing this public asset and for ensuring that the public's investment in the ballpark is not compromised.

Safeco Field is located just to the east of the Viaduct project. The project's south portal for the deep bore tunnel is located just blocks from the main entrances to the ballpark. As we noted in our previous comment letters, Safeco Field and our tenant the Seattle Mariners will be directly affected by the proposed construction activities, including road closures, detours, traffic congestion, and loss of daily parking and event parking.

The PF2010 continues to be concerned that project construction could have significant adverse impacts on our facility and our operations if appropriate mitigation measures are not implemented. In addition to the comments we made previously, we would like to highlight the following items for response in the final EIS:

- L-006-001** | Automobile ingress and egress: As a spectator sports facility, the continued success of Safeco Field turns in large part on our baseball fans and patron's ability to access our facility. While we understand that facility access will be affected during the period of project construction, we would like to continue to work with WSDOT and the City on appropriate mitigation planning, especially during events. We have had a productive relationship in working together during the SR 519 construction (phases 1 and 2), and we look forward to continuing that kind of close coordination.
- L-006-002** | Pedestrian Access and Fan Safety: Safeco Field is a major pedestrian venue, especially on game days and major event days. Many fans and patrons use Alaskan Way and First Avenue S. for commuting from the ferry terminal and other waterfront locations. The final EIS should include detailed mitigation plans for ensuring continued safe pedestrian access to Safeco Field during the period of construction.
- L-006-003** | Parking Mitigation: The SDEIS describes the significant loss of 360 parking spaces in the South Portal area, including the loss of 200 off-street parking spaces on the WOSCA property. As described in the Seattle Mariners' comment letter, this parking loss is especially significant on event days. Combined with the Holgate to King Street Viaduct Replacement project, parking losses in the South Downtown area resulting from the viaduct replacement total hundreds of stalls. This loss of parking is both concentrated and substantial. Moreover, the SDEIS misstates the number of replacement stalls that are available in the area. Recent construction at the former Home Plate parking lot has resulted in the loss of approximately 300 additional stalls.
- The mitigation identified in the SDEIS—"publicity and signage directing drivers . . . to appropriate parking locations"—is insufficient. Given the potential significance of the impact, the final EIS should identify as a potential mitigation measure the full replacement of this lost parking in the south downtown area. Following completion of the project, the WOSCA property may provide a potential location for relocating this lost parking, perhaps in an elevated parking structure. The 2010 SDEIS does identify a \$30M mitigation fund that could be dedicated to this purpose, but that amount is likely to be insufficient to mitigate this and all of the other project impacts.
- L-006-004** | Alternative Transportation Modes: Responding to the loss of transportation capacity caused by the viaduct replacement will require the use of a variety of different transportation modes. The 2010 SDEIS describes a number of 'independent' projects that 'complement' the bored tunnel alternative. Included among these is the First Avenue Streetcar evaluation, which was recommended by the Partnership Process described in the 2010 SDEIS. We believe that this project has merit and should be evaluated as a potential mitigation measure to help address the loss of traffic and pedestrian access that will be caused by project construction and the long-term decrease in roadway capacity with the tunnel alternative.

L-006-001

As an on-going task for the overall planning and design effort, the project team will continue to communicate and coordinate with the Mariners and Seahawks organizations as well as the affected SODO businesses to ensure that reasonable measures are in place to accommodate trips during large sporting events. The proposed Stadium Area ramp connections to/from the north essentially relocate the existing First Avenue S. ramp connections to the frontage road at S. Royal Brougham Way. Therefore, traffic volumes on S. Atlantic Street or S. Royal Brougham Way east of First Avenue S. are not expected to substantially change, even for larger sporting events at Qwest Field or Safeco Field. However, it recognized that the revised SR 99 connections to/from the north and new SR 99 connections to/from the south would result in changes in travel patterns, redirecting some traffic from First Avenue S. to the frontage road and sections of S. Atlantic Street and S. Royal Brougham Way west of First Avenue S. It is also recognized that the removal of downtown ramps for the Bored Tunnel Alternative (preferred alternative) would add traffic to the SODO area. WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

L-006-002

Pedestrian access will be maintained throughout construction. Temporary access limitations and any required changes to access during construction will be mitigated to the extent practicable and in conjunction with the affected businesses and residents. Pedestrian access during construction will continue to be addressed in the on-going construction impacts evaluation and through on-going work by project staff. In addition, WSDOT will be preparing a construction traffic management plan for the selected alternative as construction plans are refined.

L-006-005

South Portal Options: The PFD has reviewed the two options for the South Portal, and we support the preferred alternative with the single Dearborn Intersection.

L-006-006

We would like to close by renewing our commitment to work with WSDOT, the City, and all of the project partners regarding mitigation planning for implementing this major project. We believe that if we work together on mitigation planning, the impacts of construction and long-term operations can be reduced. Thank you for your consideration.

We also note that our tenant, the Seattle Mariners, has submitted a separate comment letter. The PFD has reviewed that comment letter and joins in the concerns and issues raised by the team.

Again, we appreciate the opportunity to comment, and we look forward to working with WSDOT, the City of Seattle and the consultant team as this important project proceeds. If you have any questions, please give our Executive Director, Kevin Callan, a call at (206) 664-3076 or (206) 767-7800.

Sincerely,



Dale R. Sperling, Board Chair

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

L-006-003

The spaces already removed and accounted for in the S. Holgate Street to S. King Street Viaduct Replacement Project environmental documentation are considered, by definition, an existing condition for the purposes of the analysis conducted for the Final EIS. However, the parking spaces that could have been replaced after S. Holgate Street to S. King Street Viaduct Replacement Project completion were accounted for in the Supplemental Draft EIS and continue to be reflected in the Final EIS. The S. Holgate Street to S. King Street Viaduct Replacement Project Environmental Assessment showed about 800 parking spaces on the WOSCA site that were affected by that project. Several hundred more spaces were identified on the parcels to the south of WOSCA. Approximately 200 parking spaces could have been replaced on WOSCA but are precluded by the Bored Tunnel Alternative so have been counted as a parking loss for the Bored Tunnel Alternative.

The Home Plate Development was acknowledged in the Supplemental Draft EIS and continues to be reflected in the Final EIS to be associated with a loss of approximately 300 parking stalls in the stadium area while construction of that development is underway.

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 are listed in Chapter 6 of the Final EIS Appendix C, Transportation Discipline Report.

L-006-004

The City of Seattle is leading planning for its streetcar system, including a potential route on First Avenue. Your support of this route has been brought to their attention.

L-006-005

Thank you for your support, the preferred Bored Tunnel Alternative includes the new intersection at S. Dearborn Street and Alaskan Way S.

L-006-006

Thank you for your continued commitment and coordination with the program team. Mitigation, like project plans, evolve and are refined through the development process. Continuing analysis and working with affected parties, like the Public Facilities District, helps to further develop mitigation measures. Chapter 8 of the Final EIS discusses the current mitigation measures for the project. The lead agencies will continue to refine, or identify new, mitigation measures and work with affected businesses and residents throughout the project's design and construction process.