



December 15, 2010

Angela Freudenstein
AWV Replacement Project SDEIS
Washington State Department of Transportation
999 Third Avenue, Suite 2424
Seattle, Washington 98104

Via email attachment: freuda@wsdot.wa.gov

Re: Comments on second SDEIS for the Bored Tunnel Project

Dear Members of the Project Team:

The Seattle Mariners appreciate the opportunity to provide input to the AWV replacement program – bored tunnel project. The following comments are made on behalf of the Mariners and over 31 million baseball fans that have attended baseball games, and the hundreds of thousands of others who have attended non-baseball events, at Safeco Field since opening in 1999. We look forward to continuing our work with the project staff to ensure that the Alaskan Way Viaduct Replacement Project moves quickly to successful completion.

B-005-001

We have previously commented on scopings and earlier EIS drafts, (2003, 2007, 2008, etc.) covering various projects within the AWV program. We have, however, continuing concern with the issues of access and parking that we do not believe have been fully acknowledged or adequately addressed. In particular we are concerned with statements in the current SDEIS that seem to deny a problem has developed due to the multiple phases/projects of the AWV replacement program. Using parking inventory as an example, in the various documents where losses were documented in earlier project phases, and which losses could theoretically have been returned to use if the bored tunnel project

B-005-001

The project team recognizes the ongoing concerns of the Seattle Mariners and the Washington State Major League Baseball Stadium Public Facilities District with respect to parking and we appreciate your comments. The Final EIS takes previous parking losses into account with respect to the environmental documentation for the S. Holgate to S. King Street Viaduct Replacement Project. For instance, the S. Holgate to S. King Street Viaduct Replacement Project assumed that 200 spaces could be replaced on the WOSCA site. Although those spaces are currently gone, this Final EIS counts the 200 spaces as a removal beyond that caused by the S. Holgate to S. King Street Viaduct Replacement Project because they could have otherwise been replaced at the completion of that project.

Although parking 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 are listed in Chapter 6 of the Transportation Discipline Report (Appendix C of the Final EIS).

B-005-001

did not move forward, they are not acknowledged in the current SDEIS. Accuracy in documenting the total program-related parking loss of over 1400 spaces is critical not just to the event facilities but to the Port of Seattle, businesses, residents, visitors and even to the program itself. Understanding and documenting in a concise manner the compounding of impacts must ultimately transition into a plan to permanently replace the lost parking.

B-005-002

Of additional concern to the Mariners is the continuing inclusion of statements within the document regarding the availability of public transit to events. Based upon current federal regulation, neither Metro nor Sound Transit are able to provide any additional transit service to substitute for lost parking capacity for the events facilities. On page 120: "Event-goers would continue to be encouraged to use bus and rail service and to carpool to the stadiums." While this somewhat accurate, nothing in the Safeco Field TMP states nor implies that regular route transit service is in any way adequate to provide anything more than a very small supplemental transportation opportunity. If event-goers were, because of a loss of parking, aggressively directed to use the available regular route service the impacts on commuters could become severe, especially during the late evening hours when service is extremely limited. The document also fails to understand or recognize that rail service is only available for a small number of weekend baseball games, and never available for night games (the vast majority of games). Finally, the statement that the Safeco Field TMP has "transit-related goals" is totally erroneous. Assuring that the ballpark's access needs are maintained during the bored tunnel project cannot be addressed by assuming transit agencies will pick up the slack when there is no plan and no ability of those agencies to do so.

Construction Phase Issues

Conditions during construction, as portrayed in the current SDEIS document, which already produce, and will continue to produce, adverse impacts on Safeco Field include (1) transportation of spoils and materials, (2) construction worker parking, (2) traffic detours, (3) loss of event parking.

Transportation of Spoils and Materials

B-005-003

We understand that the contractor will complete the design of the transportation system for the bored tunnel project. We do note, however, that Edgar Martinez Dr. S. was specifically identified in the SDEIS as a primary or preferred transportation route. While that street provides a direct route to freeways, it is also the primary vehicle route, and second major pedestrian access route, for events at both Safeco Field and Qwest Field and Event Center.

Approximately 30% of the pedestrians coming to games at Safeco Field arrive from parking locations south of Royal Brougham. With approximately 2000 cars parking in the Safeco Field Garage representing approximately over 6000

B-005-002

Additional King County Metro transit service will be provided as part of construction mitigation. While some added travel time would be incurred by buses during construction, transit operations would still be maintained. The project would not support ongoing transit expansion after construction is completed. Improvements to the speed and reliability of transit service will also be supported by the project and continue to be in place after construction is completed. Following construction of this project, transit service enhancements by other agencies are expected in downtown Seattle; for example, Sound Transit light rail and commuter rail expansion under Sound Transit 2 and the King County Metro RapidRide bus program.

B-005-003

To maintain acceptable operation along the S. Atlantic Street corridor (including Edgar Martinez Way) between E. Marginal Way and Interstate I-90, the following limitations on the Bored Tunnel Alternative construction haul traffic would be imposed:

- AM and PM peak hour (6:00 to 9:00 am and 3:00 to 7:00pm on weekdays) – Construction haul traffic entering and exiting the South Portal area shall be limited to 15 trucks per hour in each direction.
- Midday (9:00am to 3:00pm on weekdays) – Construction haul traffic entering and exiting the South Portal area shall be limited to 30 trucks per hour in each direction.
- Weekend event peaks (from 2 hours in advance to 1 hour following a scheduled event with more than 15,000) – Construction haul traffic entering and exiting the South Portal area shall be limited to 15 trucks per hour in each direction.

B-005-003

pedestrian crossings, and up to an additional 8000 additional pedestrian crossings from other south end parking locations (probably representing an additional 2500 vehicles), for a full house event, the importance of Edgar Martinez Drive S. to the functioning of Safeco Field cannot be underestimated. This access need is not limited to just 81 baseball games per year since Safeco Field Garage is also under covenant to Qwest Field and Event Center for event parking, including 10 or more professional football games, 20 or more soccer games, concerts, flat shows, and during 2012 all Husky home football games.

We must also note that 1200 trucks also use Edgar Martinez Drive to get to the Port of Seattle, with which said pedestrians and vehicle drivers mentioned above must already contend. Plus a growing number of p.m. peak commuters use Edgar Martinez Drive to access I-90.

Planning for the movement of trucks that will support the project must address and protect the existing use of Edgar Martinez Drive South by event-goers in terms of ingress and egress of the area by vehicles, and the final movement of pedestrians to and from the ballpark from parking locations. These movements must be accommodated in the time frames and variable event durations consistent with the operations of these major event facilities. Attempting to address the access needs of Safeco Field cannot be done by subjectively adding an untested number on top of commuting movements. Event movements are categorically different, frequently overlap with commuter movements, move in different directions and further intensify competition for access to and through the ballpark area.

Construction Worker Parking

B-005-004

Earlier conversations with project staff indicated that construction worker parking would not interfere with surrounding businesses, including the event facilities, and that a construction TMP had been prepared to address this issue. It was startling, therefore, to see on page 33; "Construction workers who are not able to park within the construction zone may seek available long-term parking in the area, first pursuing on-street spaces, and then pay lots away from the jobsite." It further goes on to say construction workers would be prohibited from parking in the area of the construction zone, however, that gives no comfort to the event facilities who rely on parking in a broad area around the facilities – a fifteen minute walk or 6000 feet being the historically identified distance. There is no description in the document of what the "construction worker exclusion zone" would include or how the ballpark would be effectively protected since no inventory of parking was completed.

Traffic Detours

B-005-005

To date, the traffic working group has addressed issues with the AWV Holgate to King project. So far, it has worked well, however, on-street disruptions and

B-005-004

Specific parking mitigation strategies have not yet been determined. One strategy under consideration is requiring a Construction Worker Parking Management Plan for the general contractor that would specifically address minimizing the negative effects of construction workers seeking parking near the work sites. This plan would be developed in conjunction with the contractor as construction plans are refined.

B-005-005

The lead agencies acknowledge the desire to establish during construction of this project a traffic working group similar to the one established for the S. Holgate to S. King Viaduct Replacement Project, as referenced in this comment. Continued coordination will occur with the Mariners and other affected businesses in the project area during construction, but it has yet to be determined if that coordination would include a working group. This is a decision that will be made closer to the time of construction.

B-005-005

detours and work during summer high-event seasons, has not been a major part of the discussions. We look forward to a continuation of this working group. We must reiterate the need for ongoing and complete analysis of construction impacts over a broad area if the work of this group is to be meaningful in terms of accommodating event traffic.

Loss of Event Parking

B-005-006

The 2010 SDEIS only addresses the additional loss of parking caused by the bored tunnel project. This is an inaccurate reflection of the total loss of parking which commenced with the AWV Holgate to King Project but continues through the bored tunnel project. While there is a desire to separate the additional loss from the original loss, parking lost in the south end project continues to be lost in the bored tunnel project. In theory, some of the spaces lost in the earlier Holgate to King phase could have been returned to use if the bored tunnel project did not proceed. If these are truly separate projects the cumulative loss should be re-addressed and acknowledged in the bored tunnel project and the total program-related cumulative impacts revealed. This loss is not inconsequential.

It should be recognized that the number of event parking spaces actually lost on the WOSCA site is not reflected on page 120. Many of the spaces on that site were located inside the demolished terminal building and those have not been included. A count of the number of exterior parking spaces from aerial photographs shows that the WOSCA site had a total of well over 800 outside parking spaces on event days (Royal Brougham to Dearborn, First to ferry holding lanes). Even if the numbers in the first project EIS and the current SDEIS were added together they would not add up to the actual total parking that was historically available on that site. The Union Pacific site (tail track site) south of Royal Brougham, also contributed a substantial amount of parking – over 400 spaces on event days - which was also included in the south end project and not reflected in the overall program related loss. In theory a substantial portion of that parking could also have been returned to use if the bored tunnel project did not proceed and therefore should have been accounted for in the bored tunnel project as additional spaces lost.

A review of historic documents will show that the design day parking need for Safeco Field is 14,400 parking spaces. Again on page 120 the document incorrectly includes parking that is no longer available (Home Plate Lot) and acknowledges that the major nearby lots and garages only supply 6,900 spaces (minus the 300 at Home Plate Lot, 6,600 spaces), and says there is other parking available but does not go into any analysis of where the other parking spaces are located, only making a vague reference to there being some other parking available somewhere. The 6,600 spaces identified only represent 46% of the total spaces needed. Without an analysis it is not adequate or accurate to portray or assume any remaining parking supply is there, is adequate, or where it is located is accessible to the ballpark.

B-005-006

Fewer than 300 parking spaces in the south portal area would be affected during project construction compared to spaces currently available. The spaces already removed and accounted for in the S. Holgate 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.

The parking spaces that could have been replaced after S. Holgate 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 to S. King Street Viaduct Replacement Project Environmental Assessment showed 794 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.

B-005-006 | Understanding parking impacts developed and compounded through the duration of the entire program must ultimately transition into a plan to replace the lost parking to meet the needs of the event facilities. As has been stated in the letter from the Public Facilities District, the WOSCA site post-project should be reviewed as a viable location for replacement parking.

Operational Phase Issues

Traffic Increases

B-005-007 | The placement of an interchange at Royal Brougham/Atlantic during construction of the south end project will bring new traffic into close proximity of Safeco Field and Qwest Field and Event Center. There will be a significant increase in surface street traffic when the bored tunnel portion of the program is completed due to the loss of CBD ramps. Once the new roadway is in operation the competition for available roadway near the ballpark will intensify substantially under "normal" circumstances. The impact of that additional traffic on access to the ballpark was only given a rudimentary review for the south end project. Prior to moving forward, the bored tunnel project must understand the severe bottleneck that will develop near the stadiums due to increased peak commute use of First Avenue and Edgar Martinez Drive and develop a plan to address this issue. Measures to mitigate new bored tunnel-related traffic impacts on the operations of this regional event facility must be provided.

Transit

B-005-008 | Similar to the statements made in the construction period section of this letter, none of the transit agencies can supply enhanced capacities for events, and none have made any plans to do so. Any statement made in the SDEIS that implies that any more than a small number of event-goers can come to, or go home from, these facilities via transit is erroneous. These mis-statements can seriously harm the ballpark but would also harm commuters who would find themselves competing for space on already full coaches late in the evenings – left at bus stops for extended periods of time because buses would become overloaded. At a time when the transit agencies are preparing to cut service, unless and until the transit agencies provide specific, approved plans to provide additional transit service to the event facilities it is misleading and irresponsible to make statements about transit service to the major event facilities anywhere in the SDEIS document.

Parking

B-005-009 | As stated in the construction section above, the project documentation has created a misleading "analysis" of the parking loss in the stadium area. In fact,

B-005-007

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 all trip activities even during large sporting events. The proposed Stadium Area ramp connections to/from the north would 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. would not be expected to substantially change, even for larger sporting events at Qwest Field or Safeco Field. However, it is recognized that the revised SR 99 connections to/from the north and new SR 99 connections to/from the south will 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 Project would add traffic to the SODO area. Steps would be taken to develop a suite of measures (detour routes, road closures plans, signage plans, etc.) that may be used to address high concentrations of traffic during major south-end events.

B-005-008

The lead agencies acknowledge that event goers arrive at Safeco Field via several modes and transit is one component. Additional King County Metro transit service will be provided as part of construction mitigation. While some added travel time would be incurred by buses during construction, transit operations would still be maintained. The project would not support ongoing transit expansion after construction is completed. Improvements to the speed and reliability of transit service will also be supported by the project and continue to be in place after construction is completed. Following construction of this project, transit service enhancements by other agencies are expected in downtown

B-005-009

there has not been an analysis of the impact of the loss of parking on the event facilities. This issue is further exacerbated by the erroneous assumption (see "Transit", above) that event-goers would have the option to switch to transit, where no transit option exists, and none is planned. To mitigate for the loss of over 1400 parking spaces (10% of the parking needed to support Safeco Field), the project needs to identify and set aside a new parking location nearby to where the parking was removed to serve the event facilities. We suggest the option to develop the remaining property at the WOSCA site at the end of the construction project should be considered.

We also note that the Washington State Major League Baseball Stadium Public Facilities District, "PFD", the owner of Safeco Field, has submitted a separate comment letter. The Mariners have reviewed that comment letter and join in the concerns and issues raised by the PFD.

Thank you again for this opportunity to comment on behalf of the regional event facilities, baseball fans, and the hundreds of thousands of others who have enjoyed coming to Safeco Field. We look forward to future opportunities to work with the project team on impacts, alternatives and mitigation measures related to Safeco Field. If you have any questions please contact me at (206) 346-4236 or by mail at: Seattle Mariners, PO BOX 4100, Seattle, WA 98194.

Sincerely,

Susan K. Ranf
Director of Transportation and Neighborhood Relations

cc: Bart Waldman, EVP and General Counsel, Seattle Mariners
Tom Backer, Counsel, Public Facilities District

Seattle; for example, Sound Transit light rail and commuter rail expansion under Sound Transit 2 and the King County Metro RapidRide bus program.

B-005-009

As documented in the Final EIS, fewer than 300 parking spaces in the south portal area would be affected during project construction compared to spaces currently available. Specific parking mitigation strategies have not yet been determined, but the project has allocated \$30 million for parking mitigation.

The lead agencies acknowledge that event goers arrive at Safeco Field via several modes and transit is one component. Additional King County Metro transit service will be provided as part of construction mitigation. While some added travel time would be incurred by buses during construction, transit operations would still be maintained. The project would not support ongoing transit expansion after construction is completed. Improvements to the speed and reliability of transit service will also be supported by the project and continue to be in place after construction is completed. Following construction of this project, transit service enhancements by other agencies are expected in downtown Seattle; for example, Sound Transit light rail and commuter rail expansion under Sound Transit 2 and the King County Metro RapidRide bus program.