

Port of Seattle's Matrix of Comments on Arena Draft EIS (9/30/13)

Page numbers are for reference only and the comment may apply to more than one location in the DEIS. If the comment applies to information in multiple locations, such as in the DEIS and the Technical Appendix, it should be corrected in all applicable locations.

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
APPLICATION OF SEPA RULES			
1	Throughout	<p>Public vs. private project – The DEIS erroneously identifies the arena as a private rather than a public project. The SEPA rules provide:</p> <p>When the proposal involves both private and public activities, it shall be characterized as either a private or a public project for the purposes of lead agency designation, depending upon whether the primary sponsor or initiator of the project is an agency or from the private sector. Any project in which agency and private interests are too intertwined to make this characterization shall be considered a public project. WAC 197-11-928.</p> <p>The City and County have already contracted with the proponent, ArenaCo, to contribute significant public financing in the amount of \$200 million to acquire the arena after it is constructed. Then, the City and County will lease the arena back to ArenaCo. Interlocal Agreement, arena development, financing, acquisition, and operation (ILA), paragraph 5(b) and (c), dated October 8, 2012. The Memorandum of Understanding (MOU) between the City, the County and WSA Properties III (ArenaCo) also sets forth the business terms and conditions for the City-County financing structure for the proposed arena. See MOU, Seattle Sports and Entertainment Facility, paragraph 10, dated October 8, 2012. Because the City and County have already contracted with ArenaCo to provide significant public financing to purchase this arena, the City has erred in characterizing the arena proposal as a private proposal. The significant roles played by the City and County in financing this project also makes their interests “too intertwined” under the SEPA rules to fairly characterize the project as a private project.</p>	The project must be characterized and treated as a public project in the application of SEPA.
2	Throughout	<p>Improper consideration of alternatives - The distinction between private and public proposals is important because the SEPA rules create different</p>	The EIS must consider reasonable off-site alternatives

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		<p>responsibilities for agencies depending upon whether the proposal is private or public. If the proposal is private, the lead agency must consider the “no action” alternative and other reasonable alternatives. See WAC 197-11-440(5)(d). For this DEIS, the City has confined its consideration of alternatives to the ArenaCo property in SoDo, the Key Arena, and Memorial Stadium.</p> <p>For public proposals, lead agencies are responsible for considering the reasonable off-site alternatives to the proposal. <i>Weyerhaeuser v. Pierce County</i>, supra. “Reasonable alternatives” are those actions capable of attaining or approximating the proposal’s objectives but at a lower environmental cost or decreased level of environmental degradation. WAC 197-11-440(5)(b) and .786. As a consequence of the City erroneously identifying the proposal as private proposal, the City failed to consider any alternative sites outside the City of Seattle.</p> <p>Here, the DEIS failed to consider any off-site alternatives outside the City of Seattle, even though King County is a party to the MOU. Because the proposed arena is a public proposal, the DEIS should have considered off-site alternatives located outside the City of Seattle. Since King County is a party to the MOU, it would have been appropriate and reasonable for the City to evaluate alternatives in King County. As a party to the MOU and ILA, King County could have assisted the City with evaluating appropriate off-site alternatives.</p>	<p>to the proposal, including alternatives outside the City of Seattle.</p>
3	Throughout	<p>Moreover, the alternative sites selected within the City of Seattle were unrealistic and poorly analyzed. The “process for identifying and screening the locations for comparative environmental analysis” in appendix A of the DEIS confined the criteria for identifying and screening alternative sites to the size of the site area (6 acres), the adequacy of the facility size (seating capacity, floor plate size), and the applicable zoning. Appx A at A-1. Then, the DEIS analyzed the “impacts of relocation or repurposing,” access to mass transit, and final screening. This narrow approach failed to analyze the possible alternatives in light of the probable adverse significant impacts as required by WAC 197-11-440(6)(a). This meant that the probable significant adverse environmental impacts of the proposed arena upon the Port’s</p>	<p>In the screening of alternative sites, the EIS must evaluate the compatibility of the nearby uses and other adverse environmental impacts of the proposed arena on neighboring uses.</p>

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		<p>maritime industrial uses in the SoDo area were largely ignored by the City in its consideration of alternative sites. This approach further led to the consideration of such unrealistic sites as the newly constructed Bill and Melinda Gates Foundation Building, the Mariners stadium, and the Port of Seattle grain terminal property at Terminal 86.</p> <p>After dismissing these unsuitable sites, the DEIS narrowed the options to Key Arena, Memorial Stadium, and the ArenaCo site in SoDo. Although the DEIS purported to examine the compatibility of these sites, its approach was crabbled because it focused primarily on height and bulk of the neighboring structures instead of the compatibility of the nearby uses and other adverse environmental impacts of the proposed arena on neighboring uses. Appendix A, A-7 and A-8. Again, the City ignored the elements of the environment as a means of analysis and erroneously concluded that the ArenaCo site in SoDo was the best alternative.</p>	
4	Throughout	The City Department of Planning and Development requires that the EIS contain a “No Vacation” alternative. The only analysis for a “No Vacation” alternative is in the EIS is in a portion of the Transportation section for the analysis of the No Action Alternative. The proponent will need to provide a copy of the Draft and Final EIS with vacation/no vacation alternatives analyzed for all elements of the environment – not just a portion of the transportation analysis. The EIS is not in compliance with Seattle Municipal Code without a “No Vacation” alternative.	Provide a “No Vacation” alternative for the EIS as an additional alternative with a full analysis of the existing conditions, identification of potential impacts and identify mitigation as appropriate.
5	Throughout	The EIS does not make use of the EIS’s that were prepared for the CenturyLink football stadium and the Safeco Field baseball stadium to allow the environmental review to build off of the existing impacts and mitigation analyzed and provided for these two major sports facilities in the area. Analysis of whether the calculations and analysis were accurate as to real conditions would provide a good context to formulate appropriate mitigation commitments for the size of a proposed large sports facility.	Refer to the <i>Washington State Major League Baseball Stadium Project DEIS and FEIS</i> and the <i>Football / Soccer Stadium and Exhibition Center DEIS and FEIS, 1998</i> . Review the mitigation measures associated with impacts similar to those that will be created by the proposed arena. Commit to equal or higher mitigation levels for equal or higher adverse impacts

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
			from the arena.
6	EIS Summary Section 1	Summary is so general that it does not accurately portray the information and analysis provided by the DEIS. Most of the section is a description of the proposal, rather than an analysis of impacts and mitigation. The tables are acceptable, but in many cases, especially related to required mitigation measures, and to secondary and cumulative impacts, there is no clear relationship to the analysis in the text. The document would be greatly improved if all of the tables in Section 1 included a reference to the DEIS section on which they are based, since there is not necessarily a corresponding analysis and conclusion within the body of the text.	Provide correlation between Section 1 and corresponding reference in the body of the DEIS.
LAND USE			
7	Page 3.6-1	3.6.1.1 The DEIS states in the Existing Land Use section that "The Seattle Comprehensive Plan 2004-2024 job target for the Greater Duwamish is to add new 9,750 jobs." However, there is no correlating statement in the Impacts section to show how Alternative 2 or 3 would impact that job target either in a positive or negative way.	Provide information in the Impacts section that shows how Alternatives 2 or 3 would impact the Comprehensive Plan job target for the Duwamish.
8	Page 3.6-1	3.6.1.1 The DEIS states in the Existing Land Use section that "The primary employer is the Port of Seattle. Port-related businesses also account for a substantial number of jobs.....Port and industrial-related job growth is the goal for development in this area." However, there is no correlating statement in the Impacts section to show how Alternative 2 or 3 would impact Port-related businesses.	Provide information in the Impacts section that shows how Alternative 2 or 3 would impact Port-related businesses.
9	Page 3.6-4	3.6.1.3 The DEIS states "Land use impacts of the street closure are minimal since the uses related to that street would be demolished in construction of the Proposed Project or Alternative 3." Wouldn't the impact be the complete loss of the existing uses since they would not be demolished but for the Alternative 2 or 3?	Provide information on why the description of the impacts as "minimal" is appropriate given there would be a complete loss of the existing uses.
10	Page 3.6-5	Alternative 2 and 3's location relative to the port and the traffic network creates a direct impact on the viability of the port through deteriorated access to port terminals caused by arena traffic and the vacation of Occidental Avenue. Traffic becomes a land use issue when a zone allowing commercial uses with significant traffic generation surrounds an industrial zone. This must be mentioned here.	Provide information on how allowing commercial uses with significant traffic generation will impact the industrial zone.

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
11	Page 3.6-5	<p>This is a good discussion of the efforts to reconcile the conflicting land use goals of industry protection and meeting the needs of stadium users. However the listed actions are all things that occurred in the past and are part of Existing Conditions and therefore this discussion does not belong in the Mitigation section.</p> <p>After moving the discussion, a new item should be added: the 2007 Industrial Lands ordinance (which significantly limited the amount of commercial development allowed in industrial zones).</p>	<p>Move the information on listed actions that have already occurred to Affected Environment or Existing Conditions and only list actions that are mitigation for impacts in the Mitigation section.</p> <p>Add the 2007 Industrial Lands Ordinance to the list of Existing Conditions.</p>
12	Page 3.6-5	<p>The Mitigation items listed are past actions and should be listed as part of Existing Conditions. The Mitigation section should identify future actions necessary to mitigate for impacts from Alternatives 2 and 3.</p>	<p>Based on the commercial-industrial land use conflicts mitigation must include 1) limitations on concurrent events in the three spectator sports facilities, 2) restrictions on daytime events, and 3) land use code changes that will mitigate the arena's role in catalyzing more commercial development in and near the Duwamish MIC.</p>
13	Page 3.6-5	<p>The stifling effect of increased property values in an industrial district is well established. This is an impact caused by Alternatives 2 and 3. Their role in catalyzing further commercial development that must be mentioned here.</p>	<p>Discuss how Alternatives 2 and 3 impact further commercial development in the area.</p>
14	Page 3.6-5, Section 3.6.1.5	<p>The DEIS states "ArenaCo owns additional properties within and outside the Stadium Transition Overlay District. No development has been proposed for those properties, however development of the Proposed Project or Alternative 3 could induce the redevelopment of those properties for commercial uses designed to support the Proposed Arena or stadiums. New development would be subject to a site specific evaluation under SEPA and Land Use Code development and use regulations." Although there may not be specific plans ready for potential development of the properties, there should be an analysis of the conceptual uses of the properties and potential impacts and required mitigation. In addition, there is no mention of</p>	<p>Provide a cumulative impacts analysis that includes the potential development of additional ArenaCo properties within and outside the Stadium Transition Overlay District, all permitted projects in the vicinity awaiting construction and projects that are pending permits from the City.</p>

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		ongoing development in the area surrounding the proposed project site. There should be a cumulative impacts analysis that includes all projects in the vicinity that are currently undergoing permit review at the City DPD.	
15	3.6-6	The undermining of the port-related businesses and other industrial base near Alternatives 2 and 3 are in conflict with adopted Comprehensive Plan growth targets for such jobs is a significant unavoidable adverse land use impact that must be mentioned here.	Provide information discussing the impacts to port-related and other industrial base business job targets listed in the Comprehensive Plan from Alternatives 2 and 3.
16	3.8-115	The EIS's comparisons to a 940,000 sf hypothetical development are flawed in that the development concept does not comply with use or dimensional code standards. It exceeds the 3.0 FAR limit for the Stadium Transition Area Overlay District (STAOD). Here the EIS is referencing the development concept put forward by the applicant in the Design Review Board materials for the Street Vacation Petition. That document, dated 3/12/13, on page 13 describes the development as retail, office, and residential. Residential is not allowed categorically in the STAOD.	Please make the correction to the square footage and re-analyze impacts in the DEIS based on the correct figure.
17	3.10-1	Placing so much discussion of land use in the Regulatory Framework section instead of the Land Use section is confusing and impacts the document's readability.	Combine the information from Regulatory Framework section into Land Use section.
18	3.10-3	Per above comment the broader discussion may need to be moved back to the Land Use Section but the reference to the MOU-mandated land use studies must be augmented with information on the emerging conclusions of those studies. In particular the study has led to a preliminary recommendation to allow hotels throughout the STAOD and residential in a portion of the STAOD which creates new impacts that must be mentioned.	Provide information on the conclusions of the MOU-mandated land use studies. Provide specific information on impacts that may result from allowing hotels throughout the STAOD and residential in a portion of the STAOD.
19	3.10-3	The statement is made that Comprehensive Plan policies "...have no application to the Proposed Project..." based on spectator sports facilities being an allowed use in the Stadium Transition Area Overlay District. By law, the Comprehensive Plan forms the basis for development regulations. The fact that a use is allowed does not preclude environmental analysis of projects incorporating the use and reviewing Comprehensive Plan policies is a valid means of identifying impacts. Comp Plan Goal LUG-24 is salient and	Provide environmental analysis of impacts on surrounding land use from Alternatives 2 and 3 in relationship to the goals of the Comprehensive Plan.

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		should be mentioned here.	
20	Page 2-3, Section 2.3.1 zoning, paragraph 2	<p>“The applicant is not proposing to build new attendee parking but instead to share existing parking with other facilities.” Per SMC 23.74.008, footnote 1. “Parking required for a spectator sports facility or exhibition hall is allowed and shall be permitted to be used for general parking purposes or shared with another such facility to meet its required parking.” This section does not eliminate the need to provide required stadium-associated parking.</p>	The DEIS narrative should include what parking would be required both by code and to meet the anticipated facility needs. It should further assess whether existing facilities are adequate or additional parking is needed, and whether there would be adverse impacts which can be avoided or mitigated by the proponent.
21	Page 3.6-1, Section 3.6.1.1. Entire section	<p>The DEIS text does not include a complete and accurate description of the existing environment related to the land use elements, nor does it provide a thorough analysis of how the proposal would comply with existing land use plans and to estimated population, growth, and other critical factors. No mention is made, nor is analysis provided of multiple Port and City land use and comprehensive plans and policies that would protect the industrial uses in the area. The analysis is selective in citing only those policies that could be interpreted to support a third arena within the overlay district, when a third arena was never part of the planning discussions.</p> <p>The proposal is inconsistent with the following:</p> <ul style="list-style-type: none"> • Land Use Element: LUG24, LUG 26, LUG27, LUG28, LU 140, LU148, LU160, LU161, and LU169. • Container Port Element: CP1, CP2, CP3, CP4, CP5, CP6, CP7, CP8, CP9, CP10, CP11, CP12, and CP14. 	Include a thorough and comprehensive narrative and analysis of existing land use plans. Include analysis of consistency with port development and transportation plans, all sections of the City comprehensive plan that apply to the site, and how the proposal fits with GMA mandated goals for preservation of industrial uses and job sectors. The analysis fails to comply with requirements of the SEPA rules, see WAC 197-11-440(6)(d)(i).
22	Page 3.6-1, Section 3.6.1.1., paragraph 4	“There has been an annual decline in covered employment...since the high of 67,728 in 2008. This section implies that declines in employment since 2008 are part of a normal natural trend, when this decline is more likely attributed to the recession which followed 2008.	Revise this section to include longer trends, and current trends related to port-related businesses.
23	Page 3.6-4, Section 3.6.1.3, paragraph 1	“No land use impacts during construction are anticipated...” What is the basis for this conclusion? There is no analysis provided. With an estimated two year construction period, and potential associate disruptions, there is a	Provide a factual or analytical basis for the conclusion.

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		potential for existing businesses and uses to be affected.	
24	Page 3.6.4, Section 3.6.1.3, paragraph 4	“Land use impacts of the street closure are minimal since the uses related to that street would be demolished...” The Port does not agree with this statement regarding Occidental Avenue, since the street closure will have significant transportation impacts on the entire industrial area. See transportation comments.	Provide discussion/analysis of impacts (direct, long term, cumulative) to land uses in the surrounding area due to elimination of this key corridor.
25	Page 3.6-5, Section 3.6.1.4 and 3.6.1.5. Entire section	The listed measures are not mitigation but existing and applicable land use policies. No mitigation measures have been identified related to the impacts of the current proposal. While it is acknowledged here that ArenaCo “...owns additional properties within and outside the Stadium district, the cumulative impacts of such likely development is unspecified and mitigation measures are not identified. The Port does not agree that the contemplated future uses would be considered as providing support services for industrial and maritime businesses in the area. In fact, these businesses will be negatively impacted by the proposal and analysis of these impacts is missing here.	Identify / provide a commitment to funding & implementation of adequate mitigation of the identified impacts, which include a significant conversion of industrial uses to commercial, retail & mixed use development. This analysis fails to comply with the requirements of SEPA rules , WAC 197-11-440(6)(a), (d) & (e).
26	Fact Sheet page iii, Proposed Action	The proposed action description is remiss in excluding the fact that the proposal proposes 60-65 additional events (that may be non-sport related).	The description of the proposed action should clearly state that the purpose of the arena is not just for a sports facility but also for other events and provide some description of the types of events expected to occur, the times of those events and analysis of potential environmental impacts.
27	Table 1-1, pg. 1-36, Alternative 2	As previously noted, the use of 940,000 sf office development is flawed. “By 2030, the Arena and street vacation would degrade intersection operations along 1 st Avenue S. As compared to a 940,000 sf office development that could be allowed under the current zoning” The DEIS use of a 940,000 sf office development is flawed. It exceeds the 3.0 FAR limit for the Stadium Transition Area Overlay District.	The DEIS analysis should use the appropriate FAR limit for the hypothetical development.
28	Table 1-2, pg. 1-43, Land Use	Land Use, Operation, “No mitigation measures are required” The DEIS has not conducted a thorough analysis of existing land use plans and policies. Therefore, it is not appropriate to conclude whether mitigation measures	The DEIS land use or regulatory framework sections should analyze all relevant local, state

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		are required at this time.	& regional plans/policies incld the City's Comprehensive Plan, PSRC VISION 2040, King County Countywide Planning Policies, Seattle Planning Commission's "Review of the Proposed Sport Arena in the Duwamish Manufacturing and Industrial Center", Port of Seattle Century Agenda, Seattle Center Century 21 Master Plan, Key Arena Subcommittee Report, Container Port provisions of the State Growth Management Act (GMA), Greater Duwamish Manufacturing & Industrial Center Neighborhood Plan & City's industrial area policies.
29	Table 1-3, pg. 1-54, Land Use Summary of Secondary and Cumulative Impacts	"Land uses outside of the Stadium Transition Area Overlay District would likely change to serve the expanding needs and more commercial character of the Stadium District in contrast to the industrial-commercial and general residential character of the Port of Seattle and the Greater Duwamish MIC." This statement discloses that the proposal will likely have an adverse impact on the Port of Seattle and the Greater Duwamish MIC. It does not conclude whether it will be significant or not. However, Table 1-2 listing mitigation states that no mitigation is required. Regardless of whether the proposal is in compliance with existing land use codes, it is the responsibility of the SEPA review to provide another level of review over and above the regulatory requirements. The SEPA review must objectively analyze whether there is going to be a significant adverse impact to the environment. In this case, it is an impact to existing industrial land uses.	The DEIS should go beyond stating that the proposal is or is not in compliance with local, state and federal regulations and respond to the question of whether there is a significant adverse impact to industrial land uses and propose mitigation to reduce those impacts as appropriate if there are impacts.
30	Table 1-3, Land Use	"ArenaCo owns additional properties within and outside Stadium District Overlay District" Should be "Stadium Transition Overlay District"	Make correction.
31	Table 1-3, Land Use	"ArenaCo owns additional properties within and outside Stadium District Overlay District. No development has been proposed for those properties,	Provide a conceptual environmental review of the

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		<p>however development of the Proposed Project or Alternative 3 could induce the redevelopment of those properties for commercial uses designed to support the Arena or stadiums.” It is appropriate and reasonable in this SEPA review to provide a conceptual review of redevelopment of those properties within this DEIS for the proposed arena. Leaving the analysis out of the DEIS for these additional properties does not provide a full impact analysis of the proposed development proposal in terms of secondary or cumulative impacts.</p> <p>In addition, the analysis should include all of the properties listed in Exhibit RE-23 New Construction Permits Issued in the Economic Impact appendix on page122.</p> <p>The analysis should also include the construction permits issued or currently in process by the City of Seattle in the areas of the alternatives including the 44,000 sq ft mixed-use development proposal at 2225 1st Avenue S, the 5-story office building1526 1st Avenue S, the 15,000 sq ft of retail and office building at 2727 6th Avenue S and any other newly permitted projects in the immediate vicinity of any of the alternatives.</p>	<p>additional properties and include analysis in the secondary and cumulative impact sections.</p> <p>Include the project listed in Exhibit RE-23 and other recently permitted projects that are located in the general vicinity of the alternatives in the SEPA analysis.</p>
32	2.6 Alternatives Considered But Not Advanced, pg. 2-6	The DEIS describes why the KeyArena cannot be remodeled. The DEIS does not provide any citation or reference to provide evidence of why the KeyArena cannot be remodeled to accommodate NBA and NHL events. If there is documentation available, it should be cited for the reader to review.	Provide information with citation for reader to understand why a remodeled KeyArena would not work for this project.
33	2.6 Alternatives Considered But Not Advanced, pg. 2-6	The DEIS provides Appendix A as a list of locations that were considered but not advanced for further study. The criteria used to determine alternatives to consider were not reasonable as the resultant list indicates. The list is limited to locations within the City of Seattle.	There are other sites that could serve as alternatives that may have less environmental impacts. Understanding that the location would need to meet the purpose and needs of the proposed action, the DEIS needs to provide a full explanation of why sites outside the City of Seattle were not considered. For example, a prior proponent of

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
			an arena located a site in the City of Renton that might have worked. Even though the proponent does not own a property outside the site for Alternative 2 or 3, including a site for analysis outside of the city could provide a clear comparison of an impact analysis of in-city vs. out of city environmental impacts.
34	2.7. Benefits and Disadvantages of Delaying Project Implementation, pg. 2-6	"The disadvantage of delaying construction may be to delay or reduce the likelihood of the presence of an NBA and NHL team in Seattle, with the resulting loss of the jobs and economic stimulus that major sports facilities can provide." The Port agrees that a disadvantage would be to reduce the likelihood of the presence of an NBA or NHL team in Seattle. However, the DEIS did not present an analysis sufficient to state how the potential resulting loss of jobs and economic stimulus that the Ports and industrial lands bring to the area compares to how much a major sports facility can provide.	The DEIS should provide a more thorough review and conclusion in regard to how Port and industrial lands will fare in tandem with the proposed action in terms of jobs and economic stimulus. If there will be an equal loss of stimulus from the Port and industrial lands, it is not clear that it is detrimental to delay the proposed action.
TRANSPORTATION			
<i>Analysis of Seattle Center vs. SoDo Alternatives</i>			
35	Many	Different assumptions applied for analyses of the Seattle Center site alternatives than for the SoDo site alternatives resulted in an unfair and biased portrayal of impacts for the Seattle Center alternatives. These are highlighted in the following comments.	The EIS must present a fair and unbiased analysis for the alternatives.
35a	Appendix E Table 1-2 vs. Table 1-4	Cumulative event attendance potential not fairly disclosed for the Seattle Center sites. Table 1-2 presents a good summary of how the new arena would affect cumulative attendance in SoDo. There is no similar table for the Seattle Center. The table that describes existing Seattle Center events	Table 1-4 must be amended to include the same attendance ranges for the Seattle Center sites as were provided for the

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		(Table 1-4) has ranges that are so large at the upper end, that the various alternatives cannot be compared.	SoDo sites.
35b	Appendix E Fig 2-5 vs. Fig 3-3	Available transit is not fairly evaluated for the Seattle Center sites. Link Light Rail service is not mentioned as a potential transit option for the Seattle Center sites, likely because it was deemed to be too distant from the site. However, the “International District Station” is described as a viable transit option for the SoDo site. That station is about 5,000 feet walking distance from the SoDo site along a route with many deficiencies as noted by the text (page 2-61), while Westlake Station is about 5,200 feet from the Seattle Center site along routes with good sidewalks, lighting, and no capacity restrictions such as stairs. Since the distance is about the same, the potential for riders to use these stations should be treated equally.	The same parameters must be used to describe available transit for each site.
35c		It is noted that the SoDo site is closer to the Lander Street station (about 3,500 feet), but that walking route is in even worse condition than the route to the International District Station in terms of surface and light levels and requires crossing the railroad tracks at grade. In addition, one of the primary origin/destinations for Arena attendees, the Eastside, cannot be reached by trains that serve the Lander Street or Stadium District stations. This latter fact should be mentioned in the description of transit facilities for SoDo.	The EIS should disclose that the Eastside will not be accessible from the Lander Street and Stadium District stations.
35d	Same as above	Available transit is not fairly evaluated for the Seattle Center sites. The transit figures for the two sites do not show the same level of information. For SoDo, Figure 2-5 of the EIS shows bus stops (even those as far away as Beacon Hill). For Seattle Center, major elements of the transit system are missing including all bus stops, the future Rapid Ride E Line, and transit routes along Fairview Avenue N. These should be shown on the figure as well as included in the transit analysis.	Transit figures and text must show the same level of information for the alternatives.

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
35e	Figure 2-94 vs. Figure 3-64	Primary parking area is not fairly evaluated for the Seattle Center sites. For parking impacts, the “primary study area” evaluated for the SoDo sites extends north to Columbia St (about 5,500 feet from the northwest corner of the site) to S Spokane St (about 5,500 feet from the southwest corner of the site), and then from Alaskan Way to I-5. There were no “barriers” described that would hinder parking for event patrons. However, for the Seattle Center site, the “primary study area” for parking was constrained to the area north of Denny Way and it was stated that, <i>“Parking in the Denny Regrade requires crossing Denny Way to access it. High traffic volumes on Denny Way reduce the desirability of parking compared to locations immediately east or west of the Seattle Center.”</i> (page 3-130). This is less than 1,000 feet distance from the Key Arena site and about 1,400 feet from the Memorial Stadium site. There was no mention in the SoDo area about the similar barriers of high volume arterials such as 1 st Avenue S, 4 th Avenue S, S Atlantic St or S Lander St, or mention about the barrier associated with crossing the railroad tracks on Holgate St.	Additional information should be provided in the EIS related to the location of facilities and quantity of parking assumed to be used for each of the site alternatives under different operating conditions, and to accurately depict how far from the sites those parking facilities are located. The “barriers” should be treated equally for the alternative sites.
35f	Appendix E page 3-137	Parking supply available for event attendees is not fairly presented for the Seattle Center sites. The parking supply available in the SoDo neighborhood accounted for new parking associated with dozens of proposed development projects. However, at the Seattle Center, the text mentions that <i>“over 8,000 additional parking spaces will be developed with over 65 percent of those spaces located in the SLU neighborhood...However, to be conservative, no additional parking supply was assumed under the No Action Alternative.”</i> (page 3-137). It is noted that the entire SLU neighborhood (west of Interstate 5) is closer to the two Seattle Center sites than the 5,500 foot primary parking study area assumed for SoDo. Excluding these spaces from the Seattle Center analysis does not present a fair comparison among alternatives.	Additional information should be provided in the EIS related to the future parking supply assumed to be available for each alternative, and the location of that supply. The assumptions used to determine whether to include future increases in parking supply should be treated equally among the alternatives.
35g	EIS page 1-31	Summary related to parking is not fairly presented for Seattle Center sites. With the differences in primary parking areas described above, and the omission of future parking supply near the Seattle Center, the EIS Summary Table conveys that parking near the Seattle Center would be worse than near the SoDo sites. This is not the case.	The analysis must be corrected to treat the likely walking areas and parking supply for the various sites in an unbiased manner.

Traffic Analysis

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
36	Throughout	The traffic analysis only evaluated the PM peak period. It failed to evaluate other periods incldng the peak egress period when extensive police-officer control and traffic management occurs. The Affected Environment section acknowledged that Port gates could operate at night in the future in response to growth at the Port. In addition, although the arena would not likely generate traffic during the morning or midday peak hours, the vacation of Occidental Ave S would affect traffic during those time periods.	The EIS must evaluate periods other than the PM peak hour, including the peak egress period. The adverse effect of the Occidental Avenue S vacation should also be evaluated for the AM and midday peak hours.
37	Appendix E Table 2-40 & 2-41	The freight corridor travel time analysis performed for the EIS does not account for additional delay experienced on the freeways related to increased event congestion. Nor does the analysis account for increased delay associated with excess circulation to find available parking, with police-officer control of traffic, or with rerouting of traffic that can occur before and after events.	The EIS must account for delay on I-5 as well as additional delay associated with excess circulation and event-related traffic control.
Holgate Street Railroad Grade Crossing			
38	Appendix E Table 2-8	<p>Peak egress pedestrian flows are substantially underestimated. The text states that the analysis of peak pedestrian flows were performed for the peak 15-minute egress period. However, in Table 2-8, the peak flow for egressing pedestrians along S Holgate Street under condition S1 (only an event at the Arena) was presented as 2,220 pedestrians per hour or 555 pedestrians during the peak 15 minutes. Figure 2-41 (for the same condition) shows the post-event pedestrian volume on the north side of S Holgate Street as 1,795 pedestrians. Therefore, the peak flow rate assumed represents only 30% of the total egress traffic (555/1,795).</p> <p>The rate above is about half of what prior studies of the stadiums in SoDo have assumed. Analysis performed for the <i>Football / Soccer Stadium and Exhibition Center DEIS – Appendix M-1 (The Transpo Group, January 15, 1998, page 65)</i> documented that “Pedestrian counts taken at football games in September and October, 1997 corroborated the methods used to estimate pedestrian flows in previous analyses in the Kingdome area...the letting out of an event, or the break, shows just under 90 percent leaving in the hour after the break—just over 70 percent in the first half-hour. The peak 15-minute period accounts for about 55-60 percent of the departures.” Likewise, the pedestrian analysis performed for the original</p>	All of the pedestrian analysis, including the analysis of sidewalk capacity and railroad crossings must be redone using the previously documented egress assumption that 60% of the total egress demand occurs in the peak 15-minutes after an event. Rail blockages of the non-mainline tracks must also be included in this analysis.

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		<p>Safeco Field EIS (<i>Washington State Major League Baseball Stadium Project Environmental Impact Statement, Draft, May 29, 1996, page 3-336</i>) had documented that 60% of the total egress demand occurs in the peak 15 minutes after an event. Therefore, the peak pedestrian flows assumed for the new Arena analysis are likely half of what should be realistically assumed.</p> <p>Comments below related to Rail Impacts, which indicate that the volume of train crossing activity and gate closure times have also been underestimated, must also be included in the updated pedestrian analysis.</p>	
39	EIS Page 3.8-42 and Appendix E page 2-78	<p>Inadequate mitigation proposed for pedestrian impacts at the S Holgate St railroad crossings. Table 2-8 describes the potential pedestrian accumulation at the railroad crossing on S Holgate St. As previously described, the peak pedestrian flows on this route were underestimated (by about half), therefore, it is expected that the queue space needed for pedestrians during a train crossing would be nearly double what was assumed.</p> <p>However, even with the lower volumes assumed in the EIS, the analysis disclosed substantial pedestrian queues could form during a train crossing. The freight analysis determined that the average blockage in the year 2030 could be 21 minutes. At that level of delay, the analysis determined that 3,930 sq ft of queue area would be needed. If the street were improved with a typical 12-foot wide sidewalk, that queue would extend 330 feet back from the rail crossing (further if one accurately accounted for buffers at the edge of the sidewalk and obstructions). This analysis depicted the future rail lines along S Holgate Street and showed the limited queue space between the tracks. If this length of queue were to form from the BN Railway's mainline, it would extend across Amtrak yard tracks, with serious safety and railroad operational impacts. The mitigation measures in that section list "surface street improvements or pedestrian bridge on S Holgate St;" however, the pedestrian bridge is not listed in the mitigation summary. In fact, the summary section on Page 1-34 stated that "pedestrian gates may not be feasible or appropriate."</p>	The project must either commit to fully fund construction of a new pedestrian bridge on S Holgate Street or disclose the unfunded public liability.

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		If this project does not commit to building a pedestrian bridge across the railroad tracks on S Holgate St, will that obligation fall to the public? And if no bridge is built, who will bear the liability of the safety issues created by the additional pedestrians? These issues and the potential unfunded liability must be addressed in the EIS.	
40		Need for Pedestrian Bridge at S Holgate St Rail Crossing: In addition to the issues raised above about pedestrian safety along S Holgate Street, it should be noted that similar pedestrian and vehicular safety issues were addressed at the S Royal Brougham Way and SR 519 railroad crossings by grade-separating that crossing. In order to avoid, after-the-fact street and rail line design impediments, it is critical that the Holgate Street Pedestrian bridge must be required to be built before a new Arena is open.	The project must be required to build the Holgate Street Pedestrian Bridge before the new Arena is open.
Adverse Effects to 1st Avenue S			
41	Appendix E page 2-76	<p>Fully disclose the impact of the inadequate sidewalk on 1st Avenue S between S Atlantic Street and S Massachusetts Street. The pedestrian analysis in Table 2-7 noted that existing sidewalk on 1st Avenue between S Atlantic Street and S Massachusetts Street would experience “severely restricted” operations with just an event at the arena. As described in the above comment, the peak pedestrian flows used to reach this conclusion were likely underestimated.</p> <p>The existing sidewalk on the east side of 1st Avenue S between S Massachusetts Street and S Atlantic Street already extends to the property line, and near the intersection with S Atlantic Street gets as narrow as 6-feet due to the adjacent northbound right-turn-only lane. Unless the project were to acquire the adjacent property and demolish existing buildings, it is not likely possible to widen that sidewalk without taking some of the street width now dedicated to traffic flow. Loss of that right turn lane to accommodate a wider sidewalk is unacceptable to the Port and would exacerbate already poor traffic operations through our key regional access point.</p>	The EIS must disclose the change in traffic operations that could occur at the 1st Avenue S/S Atlantic Street intersection if the northbound right turn lane were removed to accommodate a wider sidewalk. That analysis should address the impact during all peak hours (AM, midday and PM) as well as without and with event conditions.
42	Appendix E Table 2-7	Analysis obscures data and assumptions about pedestrian impacts. Additional information is needed in this table to cross check the assumptions made about pedestrian flows and existing facility widths. As	Table 2-7 should be redone to show the assumptions made about pedestrian volumes and

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		stated above, it is believed that the pedestrian flows used to derive the ratings in this table are substantially underestimated. It is also unclear whether wider sidewalks were assumed.	assumed walkway widths.
<i>Vacation of Occidental Avenue</i>			
43	Appendix E Section 2.10	Vacation would eliminate only alternative route to 1st Ave S. The EIS analysis must acknowledge the impact that the vacation of Occidental Ave S would have to the neighborhood's street grid. There are only two north-south streets that connect between S Lander St and SR 519: 1st Ave S and Occidental Ave S. The other north-south street, Utah Ave S, has already been vacated in the segment just north of S Lander St. Since traffic through this corridor is sandwiched between railroad facilities with no east-west escape, vacation of Occidental Ave will further degrade SoDo's grid system and make the system less resilient to incidents.	The EIS must discuss how the vacation of Occidental Avenue would affect the grid continuity in SoDo and affect the reliability of the transportation system.
44	Appendix E Section 2.10	Overestimate impact of the No Action Alternative. The analysis performed for No Street Vacation assumes that 940,000 sf of commercial space could be constructed on the sites if the street were not vacated. There is no documentation of this size development. Given that most, if not all, of the project's parking would need to be above grade due to water table issues, it is highly unlikely that any development could reach the maximum allowed FAR before reaching the height limit.	Detailed information related to the development that could occur under the No Action/No Vacation condition should be provided.
45	No analysis provided	Occidental Avenue S is often used by motorists to escape a long train blockage on S Holgate Street. The City of Seattle's <i>South Holgate Street Railroad Crossing Study, Phase II, Final Report</i> (Fehr & Peers, January 2010) recommended adding U-turn routes so that vehicles waiting for a train could choose an alternative route.	The EIS must disclose how arena and the vacation of Occidental Avenue S would address allowing vehicles to escape a train queue.
<i>Lack of Parking and Secondary Impacts</i>			
46	Appendix E Section 2.8.4 Parking Impacts	Parking within the primary study area would be over utilized, creating secondary impacts as motorists circulate to find available or cheaper parking. Extreme congestion now occurs during large events at CenturyLink field that would be similar to those for a dual or triple event condition. The EIS traffic operations analysis does not fully disclose the impact of dual events because it does not consider the additional circulation caused by the lack of parking. Even with parking guidance, motorists are likely to circulate	A sensitivity analysis should be performed to show the potential effect of excess circulation through key intersections.

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		seeking cheaper parking when dual events increase demand and thus the price to park. Although it is hard to quantify, sensitivity analysis should be performed to show the potential effect of excess circulation through key intersections.	
47	Appendix E Section 2.8.4 Parking Impacts	Parking within the primary study area would be over utilized, creating secondary pedestrian and/or transit impacts as event attendees need to travel into financial district or retail district to park. The analysis presented on Figures 2-116 and 2-118 shows that parking in the CBD would be needed to support dual event conditions. Because the secondary parking area is about a mile from the arena site, it could create secondary impacts as those who park in the CBD use transit to access it. That secondary impact was not discussed in the transit impacts section.	Some of the event attendees who park in the retail core and financial district should be included as transit riders in the transit impacts analysis.
48	p. 1-30	The DEIS Summary comments that Arena parking may displace overnight SoDo truck parking.	Please quantify level of impact, and the remedy or mitigation for this impact.
Rail Impacts			
49	Section 2.7.2.2 Rail Crossing Delay	The EIS does not disclose findings from two prior studies that have been performed for the S Holgate Street railroad crossings: one by WSDOT (<i>S Holgate Street Railway Crossing Closure Traffic Study</i> , 2003) and another by the City of Seattle (Fehr & Peers, <i>South Holgate Street Railroad Crossing Study, Phase II, Final Report</i> ; January 2010). These studies evaluated the potential to close S Holgate Street to all vehicular and pedestrian traffic, and what improvements would be needed to keep the street open. The Port is very concerned that increased vehicular and pedestrian conflicts associated with the arena would increase pressure to fully close the street.	The EIS must acknowledge prior studies that have evaluated S Holgate Street and assess the potential to exacerbate vehicular and pedestrian safety on this corridor.
50	Section 2.7.2.2 Rail Crossing Delay	The EIS relied on recent data from the <i>Coal Traffic Impact Study</i> to determine the number of at-grade crossings and delay per crossing. However, that study only evaluated the effect on the BNSF mainline tracks. It does not include crossings or delays that occur on all of the secondary tracks that cross S Holgate Street. The <i>South Holgate Street Railroad Crossing Study, Phase II, Final Report</i> included more detailed information about the number of crossings, the blockage time, and more importantly, the amount of time the gates were	The traffic and pedestrian analysis performed in the EIS must be updated to include all of the rail crossings on S Holgate Street, not just those on the BNSF mainline. Higher average blockage rates should also be evaluated for evening event conditions.

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		<p>closed (down) at the crossings. In 2009, the study determined that the railroad gates on S Holgate St closed an average of 112 times per day during the weekdays and 79 times during the weekends. During the weekday, the total time that the gates were closed to stop traffic was 4 hours and 50 minutes per day. This is much higher than the number of crossings reported in the EIS for just the BNSF mainline. That same report found that the average minutes per hour the gate was closed was 12 minutes; however, the average closure time per hour during the evening period (6 to 10 PM) was 17 minutes, significantly higher than the 24-hour average. There were also times when the gates were closed for more than 30 minutes. The traffic and pedestrian analysis performed in the EIS must be updated to include all of the rail crossings on S Holgate St, not just those on the BNSF mainline. Higher average blockage rates should also be evaluated for evening event conditions.</p>	
51	Appendix E Section 2.7 Freight & Goods Movement	<p>Adjacent rail use areas: Rail lines and facilities east of the proposed site are committed to passenger service (Amtrak and Sound Transit) and adjacent freight rail operations. Portions of this rail marshaling area have contracted in recent years due to previous stadium development. The proposed use may further reduce rail line capability in this area, creating secondary negative effects on rail operations, including essential rail sidings and spurs used for non-passenger service. Freight line facilities are essential to the port and it is imperative that sufficient information is available to determine if the proposal will further reduce or impede rail capacity. In particular, a pedestrian bridge in the area could require alteration of rail lines in order to locate structural bridge supports and maintain necessary clearances and barrier-free area between rail lines and the new obstruction. This could diminish existing rail line capacity, require substantial re-routing, and foreclose future improvements.</p>	<p>The EIS must provide additional information analyzing potential effects on rail facilities, including secondary rail operational effects.</p>
52	Appendix E Section 2.7 Freight & Goods Movement	<p>New Arena effect on hazardous materials shipments via rail: The EIS should address how the SoDo site alternative, adjacent to working rail yards and tracks, would affect the ability to transport petroleum, pressurized gas, or other hazardous materials on those tracks.</p>	<p>The EIS should address how the SoDo site alternative, adjacent to working rail yards and tracks, would affect the ability to transport petroleum, pressurized gas, or other hazardous materials on those</p>

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
			tracks. .
Transportation Mitigation			
53	EIS Page 1-45	<p>Dual event scenarios are unacceptable, and there must be a firm commitment to an event management strategy that will prevent them. The transportation section evaluated various combinations of event cases, and implies that those cases are similar to the large events that occur in CenturyLink Field today. The largest events that now occur at CenturyLink typically occur on a Sunday and have limited effect on the Port. When a large event does occur on a weeknight, such as a Monday Night Football game or a large soccer match, it severely disrupts Port operations starting midday. With the expectation that over 120 events per year at the new Arena could have 10,000 or more attendees, there will be many more weeknights per year that experience dual events.</p> <p>The traffic operations and travel time analyses performed for this scenario do not account for the fact that during large events more vehicles circulate repeatedly through the neighborhood looking for parking. This is evidenced by the fact that vehicle exiting I-5 onto the ramps to SR 519 often back up onto the mainline during a large event. In addition to delay on local arterials, freight would also experience increased delay on the regional highways, particularly Interstate 5 and Interstate 90.</p> <p>If there is no firm commitment to event management, then the full level of delays must be disclosed in the analysis, including the increased delay to through traffic experience on I-5 and I-90, as well as additional delay caused by excess circulation to parking (see below), and delay associated with post-event traffic management protocols.</p>	<p>The project must commit to an event management strategy that will:</p> <ul style="list-style-type: none"> a) Seek to reschedule to a different day large (14,000 or more attendees) weeknight events at the Seattle Arena when they would otherwise occur concurrent with a major league sporting or concert event at either of the other two stadiums, b) If rescheduling to a different day is not possible, then the event start time at the new Arena must be changed to begin at least one hour later in the evening than the other concurrent event, and c) Under no circumstances shall the scheduling conflict be resolved by changing the start time of one or more events to occur before 4:00 P.M. on a weekday.
54	EIS Page 1-45	<p>Some of the mitigation measures presented as “optional” with the phrase “could be...” should be changed to firm commitments in order to obtain the performance evaluated in the EIS. On page 1-49, the summary states, “<i>For Alternative 2 and 3, consider working with SDOT to upgrade the traffic control equipment at signalized intersections in the Stadium District to increase its reliability through improving communications with SDOT traffic control center and utilizing current Adaptive Traffic Control technology.</i>”</p>	<p>The project must either fully commit to upgrading signal equipment and help fund the traffic control center or revise the analysis to eliminate the assumption that the signals will be optimized.</p>

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		These types of improvements are needed to “optimize” the signal timing to accommodate changes in traffic flow associated with events. Signal optimization was already assumed for the area intersections to assess the impacts of the projects as described in the note on page 2-162 of Appendix E, “Some routes show a small improvement in travel time as a result of the signal timing optimization procedures...”	
55	EIS Page 1-49	Likewise, the Arena should commit to the Parking Guidance System that <i>“provides direction and information regarding parking availability to those drivers who do not pre-purchase parking. This system could notify drivers as to the location and number of spaces available in public and event garages...reducing excess circulation.”</i> There is a high potential for excess circulation due to the lack of parking in the SoDo area, which would exacerbate traffic operations. However, no additional circulation was assumed during dual events. Therefore, this mitigation should be included in order to achieve the performance presented in the EIS.	The project should commit to implementing a Parking Guidance System for area parking garages.
56	EIS Page 1-45	Commit to Port of Seattle Protocols for Freight Access - The transportation analysis was limited to the PM peak hour. However, it was acknowledged that the Port terminal gates as well as the rail yards can be open at night. A route between the Port and the rail terminals as well as between those terminals and Interstate 5/90 via SR 519 must remain open and available before, during and after events.	The project must commit to Port of Seattle Protocols to retain freight access through the SR 519 and 1 st Avenue S corridors whenever the Port gates are open.
57	EIS Page 1-49	Commit to funding higher staffing level at the City's Traffic Control Center - SDOT's traffic control center is not staffed 24/7. Additional staffing will likely be required to accommodate more event days per year. These additional staff members are necessary to make other elements of the mitigation program function, including dynamic message signs and monitoring of traffic cameras to respond to congestion, parking and traffic incidents.	ArenaCo should commit to funding for additional staff.
58	EIS Page 1-47	A pedestrian bridge over the railroad tracks at Holgate Street MUST be included as mitigation. This text states that <i>“Increased active traffic and pedestrian management during pre-and post-event conditions to assist in helping pedestrians navigate the many railroad crossing points along with enhance surface management of railroad crossing through the implementation of additional crossing gates for pedestrians together with the development of wider sidewalks to accommodate surges in pedestrian</i>	The project must commit to fund and construct a pedestrian bridge across the railroad tracks on S Holgate Street before the Arena is open.

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		<p><i>demands before and after events and the associated pedestrian queuing."</i> However on page 1-34 of that same summary the text stated, "<i>The S. Holgate Street corridor has multiple at-grade rail crossings closely spaced in the immediate vicinity of the site and pedestrian gates may not be feasible or appropriate."</i></p> <p>In addition, we believe that the potential surges in post-event pedestrian traffic have been substantially underestimated. The potential safety implications have been understated. Just one pedestrian accident at any of the many railroad crossings would create a significant disruption to freight and passenger rail services along what is the state's primary rail corridor. If this project does not commit to constructing the pedestrian bridge, that need could fall to the public's responsibility. Worse yet would be the potential that the BNSF Railway or Amtrak move to close S Holgate Street to all crossing traffic, a scenario that would have significant adverse impacts to overall traffic circulation in the neighborhood. For these reasons, the pedestrian bridge must be included as a mitigation measure, not as an option to be "considered."</p>	
ECONOMICS (Appendix F - Economics Report)			
59	xxviii-xxix	Reference is made to the Sports Complex in Philadelphia that "only through current specific revitalization efforts of Xfinity Live! have the sports venue created ancillary development". Under PetCo Park, the report notes "catalytic development around PetCo Park, including the hotel, office complex and retail were required as a part of the MOU between the City and stadium developer" The true intent of the developer is for an entertainment center in addition to an arena. These additional effects should be considered in the Seattle Arena traffic analysis. This will greatly compound the traffic congestion along all routes serving the Port and industrial area but in addition, the introduction of a hotel into this area could lead to reduction of service or closure of SIG.	Consider the additional effects of entertainment events in the traffic analysis and state mitigation commitments in the case of adverse environmental impacts.
60	22	On-site parking was not included in the revenue analysis for the SoDo site, which is reasonable since neither the City nor the proponent would control the parking supply. However, any revenue analysis for Alternatives 4 and 5 should include potential revenue at City-owned facilities.	Include a revenue analysis for Alternatives 4 and 5.

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
61	54	Report notes that half of the exports are agricultural products, "chiefly from Washington State". Please note that nearly all of these products arrive by truck and a high portion moves through the impacted area. This impact seems to be excluded from the port impact analysis.	Provide analysis of the impacts to trucks carrying agricultural products in the economic analysis if traffic congestion is a factor.
62	57	Report notes that "there could be additional potential impacts beyond those quantified in this section in the case that the proposed arena causes reliability issues to an extent that triggers carriers or customers to move cargo or operations to other ports". The recent renewal of the Hanjin lease at T46 illustrates that carriers and shippers are becoming increasingly concerned about the impacts of redevelopment in the north SoDo area. The placement of an arena and the likely addition of an entertainment center in the overlay zone will greatly exacerbate this situation. It could also cause the southern limit of the stadium overlay zones to move farther south. This could cause a loss of container business, and this should be quantified.	Provide quantitative analysis of a potential loss of container business that could result from Alternatives 2 and 3.
63	59	Report states: "reliability of goods movement may also be a significant potential risk with the development of an arena". We concur and believe that the additional risks be quantified.	Provide quantitative analysis of potential impacts to the reliability of goods movement in the vicinity of all of the Alternatives.
64	59	Report notes "Property values do not directly impact economic activity and are not included in economic impact analysis". Increasing property values have a direct impact on uses and can lead to a shift from industrial to non-industrial uses. Further, the introduction of the arena (and entertainment center) will cause additional impacts outside of the Stadium Overlay zone, leading to increased displacement of industrial uses to the south and east.	Provide quantitative analysis of the potential impacts from increasing property values and their impacts that could lead to a shift from industrial to non-industrial uses. Include the potential impacts that could lead to increased displacement of industrial uses to the south and east.
65	60	Report states: "there would be additional potential impacts if Port carriers perceived reliability issues in the area and shifted cargo away from the Port of Seattle or move to another location." We concur and these impacts	Provide quantitative analysis of potential impacts if Port carriers perceive reliability issues in the

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		should be quantified.	area and shift cargo away from the Port and move to another location.
66	71	Reports states "although much of the trade moves to and from the Port by rail." This statement and the analysis of impacts seems to under-estimate the number of trucks that are engaged in Port traffic in the affected area even if the final movement is by rail. A growing share of imports is now transloaded from ocean containers to domestic containers. There are transload operations that are located just east and south of the arena location. Traffic would move from the terminal to the transloader, with an empty return to the terminal and a domestic container to the rail yards. Likewise, exporters truck their containers from Eastern Washington through the area to reach T46 and T25/30 and some export cargo is loaded from bulk railcar to ocean container for export. Prior analyses performed by the Port account for the trips that begin and end at the Port terminals, but not for ancillary trips that might be generated by these transloaders back to the rail yards or to other non-Port locations. These ancillary movements need to be quantified. Further, if the transloaders close these operations, then there would be an additional drayage cost for all of the affected movements. These do not appear to be captured.	Quantify the ancillary movements to account for the trips that begin and end at the Port terminals. Provide quantified analysis of additional drayage cost for all the affected movements if transloaders close these operations.
67	74	Report estimates that with night gates that 11% of traffic would move in "event vulnerable time period" with night gates. Although this estimated forecast came from the Port of Seattle, new data from the Ports of Los Angeles and Long Beach indicate that approximately 19% of gate moves occur between 4pm and 8 pm and 32% occur between 3pm and 9pm. Therefore, the impact could be three times the magnitude for the traffic that is quantified in the economic impact report. The report ignores the delays that would occur on game days on I-5, I-90, and other roads used by arena visitors.	Update the analysis to account for the new information provided from Ports of Los Angeles & Long Beach to account for the impact on traffic. Provide analysis of impact to Port traffic & operations from delays that would occur on game days on I-5, I-90, & other roads used by arena visitors.
68	79	The report assumes that S. Atlantic Street is open during Mariner game days but indicates that delays could be larger if it is not. This should be quantified.	Provide quantitative analysis of potential impacts from traffic delays if S. Atlantic Street is not

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
			open during Mariner game days.
69	81	Report states: "the greater risk could be gridlock in the segment of S Atlantic..." This impact should be quantified.	Provide quantitative analysis of potential risks of gridlock in the segment of S. Atlantic Street.
70	90	Port doesn't collect dockage and wharfage.	Revise as appropriate.
71	94	Report states: "Stadium District traffic that left these terminals less than fully competitive would handicap the Port and reduce its potential for economic development. These risks could not be quantified in the report." These impacts should be quantified.	Explain why the risks could not be quantified. These risks should be quantified and provided in the EIS.
72	95	Report states: "threat of a shift would likely reduce long-term Port of Seattle and terminal operator revenue as a result of lower negotiated rates." This is a likely result and should be quantified.	Provide quantitative analysis of how the impacts from a threat of a shift would likely reduce long-term Port and terminal operator revenue as a result of lower negotiated rates.
73	Economics	To comply with the MOU's requirement to assess the economic impacts, the EIS should disclose the total cost of all mitigation, and provide a comparison among the alternatives. This analysis should detail who is responsible for cost, and whether the commitment would be for the full cost or a share of the cost. In addition, any reduction in revenue associated with event scheduling restrictions that would limit the number of events should also be disclosed.	Provide relative mitigation costs of alternative sites.
AIR QUALITY AND GHG EMISSIONS			
74	Air Quality, section 3.2	There is no analysis to substantiate claims that the operation phase of the various alternatives will not cause adverse air quality impacts. There is no analysis to substantiate claims that "incremental increases in traffic emissions likely would be small", as well as claims that the project alternatives will cause no significant unavoidable adverse impacts to air quality. It is clear from the traffic analysis that significant traffic congestion will be created, and especially during multiple stadium events. Localized impacts from project-induced traffic should be analyzed, i.e. by "hot spot" modeling of intersections where the Level of Service (LOS) is predicted to worsen as a result of the project.	Provide quantitative analysis to substantiate claims that the operation phase of the alternatives and secondary impacts of the alternatives will not cause adverse air quality impacts. At a minimum, include an analysis of localized impacts

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
			from project-induced traffic by “hot spot” modeling of intersections where the LOS is predicted to worsen as a result of the project. If this analysis indicates that air quality standards may be exceeded at specific locations, more rigorous air quality modeling may be needed.
75	Greenhouse Gas Emissions, Section 3.2 & Appendix C	<p>The DEIS does not provide a substantive or accurate analysis of GHG impacts associated with the project, particularly of operations and traffic congestion impacts, nor does it provide any comparison of greenhouse gas emissions associated with each alternative. The use of the King County DEES SEPA GHG Emission Worksheet is an inadequate tool for estimating GHG emissions from this project. The King County worksheet includes a caveat that it “...should not be used to estimate GHG emissions from large, complex projects, such as urban planned developments, major infrastructure projects, or projects that required an Environmental Impact Statement (EIS).” King County also provides notes that the worksheet has not been updated since 2007 and “...should be used with caution.”</p> <p>Consequently the analysis drastically underestimates the actual associated emissions, particularly since the King County tool only includes a generic tool for estimated emissions for project-associated vehicle trips and does not analyze for emissions created by traffic congestion or from regional increases in VMT due to longer-distance trips from a dispersed fan base. Ecology’s GHG guidance for analysis of GHG emission in SEPA reviews clearly requires that the analysis include both vehicle emissions once the project is complete and vehicle trips generated by the project during construction and operation, including those of employees, customers, vendors, or residents. See http://www.ecy.wa.gov/climatechange/docs/sepa/20110603_SEPA_GHGinternalguidance.pdf</p>	The EIS must include an accurate and complete disclosure of GHG emissions associated with construction and operation of the project for each alternative. An accurate analysis, which includes the impacts of emissions associated with congestion, will likely raise the projected emissions substantially over 25,000 MTCO2e. In which case, per Ecology SEPA guidance, the EIS must provide a quantitative analysis of emissions and mitigation measures to reduce emissions by 11% below what emissions would have been without those measures (BAU).
76	Page 3.2-3	On June 17, 2013, Seattle City Council adopted Resolution 31447 , formally adopting Seattle's 2013 Climate Action Plan. The Climate Action Plan is	The EIS should provide analysis of whether the proposed project

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		<p>composed of recommended actions to be taken to meet Seattle's goal of becoming carbon neutral by 2050. The EIS does not provide information as to whether the proposed project would make it more difficult or less difficult for the City to meet its goals as a result of the proposed project action. The EIS states that the Plan has a wide range of GHG-reduction strategies and outlines some operational features that could be included in the proposal but it does not commit to any of these features.</p>	<p>would make it more difficult or less difficult for the City to meet its carbon neutral goals and thereby create an adverse impact to the environment.</p> <p>The EIS should commit to specific operational features that would meet the carbon neutral goals if the analysis shows that these features are needed to mitigate for adverse impacts.</p>
NOISE			
77	EIS Section 3.5	<p>The associated and ancillary development expected to follow the development of an additional stadium (bars, restaurants, commercial uses) will create a need to reduce unwanted sounds at the venue. Animated crowds within a purported industrially developed land use area will want to reduce noise impacts from existing noise source including traffic, loading-dock operations, rail yard and trains, overhead aircraft and trucks serving the industrial and Port uses. This inherent conflict will require management of commercial expectations as to level and type of noises expected both in and around the arena and related development. New development should be required to acknowledge and accept existing industrial noise conditions as part of any land use application and not be allowed to make complaints as to the nature and character of noise conditions unless the emitters are non-compliant with the Seattle noise code.</p>	<p>The DEIS should commit to the following mitigation: <i>New development is required to acknowledge and accept existing industrial noise conditions as part of any land use application and not be allowed to make complaints as to the nature and character of noise conditions unless the emitters are non-compliant with the Seattle noise code.</i></p>
78	3.5.1	<p>“ Noise from crowds outside of a spectator sports facility or from traffic going to or from a spectator sports facility are not typically included in a noise analysis of a facility. ” This is an erroneous statement. Noise from these sources are environmental impacts and do affect the natural conditions of the site. The facility will generate significant noise levels from related traffic and crowds entering and leaving the site that must be evaluated in order for a complete EIS. These noise levels should be</p>	<p>Provide quantitative analysis of the noise levels relative to a baseline and model the increase in noise relative to existing conditions for the duration of typical events.</p>

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		evaluated relative to a baseline and to model the increase in noise relative to existing conditions for duration of typical events. Finally the impact should be compared to the local noise code, relative to potential receivers and whether the noise increase are compatible to the ambient acoustic environment. Additionally, how the arena fits into the existing environment and its impacts to existing businesses and land uses both individually and cumulatively must be evaluated.	<p>The impact should be compared to the local noise ordinance, relative to potential receivers and to discern if the noise increase is compatible to the ambient acoustic environment.</p> <p>Evaluate how the arena fits into the existing environment and what its potential noise impacts may be to existing businesses and land uses both individually and cumulatively.</p>
79	3.5	As with above, ground vibration is noted in this section, with the potential for negative effects in adjacent areas. In addition, only construction-related noise effects are evaluated. From an operational perspective, heavy truck traffic in adjacent ROW areas may be a negative long-term effect. Also, industrial area noise may have potential for adverse effects on performance uses at the completed arena.	<p>Provide analysis of potential noise impacts from heavy truck traffic in adjacent ROW areas.</p> <p>Provide analysis of how industrial area noise may have potential impacts on performance uses at the completed arena.</p>
80	3.5-4	Ground vibration and construction noise evaluations should include analysis of future operations and potential for negative effects due to existing and continuing industrial area uses and activities.	Provide analysis of future operations and potential for negative noise impacts due to existing & continuing industrial area uses and activities.
81	3.5-6	3.5.2.6: Discussion of secondary noise impacts includes changes in use due to arena induced economic growth. This section does not consider the potential for "inverse" or off-site to arena-site secondary noise impacts.	Provide analysis of the potential for "inverse" or off-site to arena secondary noise impacts.
OTHER			
82	Section 3.1, Geology & Soils	Generally, the report focuses on technical matters relating to predicted liquefaction & earthquake hazards. The information is limited to description of conditions important to construction of the proposed arena, including	Provide analysis of how vibration related construction impacts raise an "inverse" issue

#	Location in EIS or Appendices	Comment	EIS Action / Remedy / Mitigation Required
		vibration effects on adjacent structures. Absent from the analysis & evaluation is information describing a complete facility, located in unstable, filled industrial area. The potential for off-site vibration effects due to adjacent transportation uses & activities to negatively affect the arena must be included. Adjacent heavy industrial vehicle & rail traffic may result in vibration in a completed arena structure. Such existing conditions require detailed analysis.	that would impact an arena constructed in Alternative 2 or 3.
83	3.1-13	Third bullet: Indicates that construction truck traffic may result in "annoying" off-site ground movement. The DEIS notes off-site ground movement and vibration due to construction traffic. Existing heavy freight and rail transportation produces similar "annoying" ground movement.	Provide analysis and evaluation of this existing condition relating to operation of a future area facility in Alternatives 2 and 3.
84	Section 3.3, Water:	Similar to 3.1, vibration in liquefaction-prone soils is noted as a potential adverse effect on buried storm water, sewer & water supply utilities. It may be that a constructed facility would be adversely affected by truck vibration.	Provide analysis of how a constructed arena may be adversely affected by freight truck vibration.
85	3.3-3	First para, storm water discussion does not indicate location of discharge for storm water in area of project. This is via sub-grade, large diameter utility lines passing under Terminal 46 and discharging beneath existing apron facilities at site. The potential for adverse effects and changes in this essential storm water infrastructure requires analysis.	Indicate the location of the discharge for stormwater in the area of the project for Alternatives 2 and 3.
86	Section 3.4, Scenic Resources	This section does not acknowledge height and mass of adjacent marine industrial landscape and potential for change.	Acknowledge the height/mass of the adjacent marine industrial landscape & potential for change. Describe potential impacts & mitigation as appropriate.
87	Section 3.7, Historic and cultural resources	The evaluation distinguishes between structures 25-50 years old and greater than 50 years old. No primary or secondary matters include port properties. Historic shoreline plot is incorrect.	Provide analysis of primary & secondary matters including Port properties. Correct the historic shoreline plot.