June 7, 2018

Seattle Department of Construction and Inspections, PRC
Attention: Public Resources Center or John Shaw
700–5th Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019

E-mail to: prc@seattle.gov

Subject: Seattle Center Arena Renovation Project (SDCI #3029061)
Comments on Draft Environmental Impact Statement (DEIS)

Dear Mr. Shaw:

The Mercer Corridor Stakeholders, who are representatives of businesses and community groups in the South Lake Union, Denny Triangle, Uptown, and Queen Anne neighborhoods of Seattle, submit these comments on the *Seattle Center Arena Renovation Project DEIS*. The Mercer Corridor Stakeholders focus on the arena's transportation impacts and our preferences for project mitigation.

We recognize that Key Arena has accommodated major events for decades. The Seattle Supersonics were still in residence there when the Mercer Stakeholders formed in 2006. The neighborhood, however, has changed dramatically since then with extraordinary growth that has resulted in daily congestion despite large investments in new transportation infrastructure. Some relief is coming with the soon-to-be completed SR 99 Tunnel and new grade-crossings of Aurora Avenue N. More investment is planned in the long-term (2035) with the extension of Sound Transit's Link Light Rail line from downtown to Ballard with a station near Seattle Center.

Transportation mitigation for the Seattle Center Arena must be directed to the first 15 years of operations before the new light rail line is activated. It should include measures to encourage transit use and reduce traffic and circulation through South Lake Union and Uptown. While we applaud the proponent's commitment to the North Downtown Transportation Fund, the investment of $1M per year over 40 years does not adequately address the short-term impact needs. As noted in our comments below, the City must disclose the transportation improvements that would be mitigation requirements of the Arena (and completed before opening day), those for which the Arena will contribute a proportionate share, and those that would be made as part of the long-term improvement fund. Mitigation that we suggest be in place for opening day is described in the comments that follow.

Transportation Comments

1. **Mitigation must focus on transit service improvements until light rail service reaches Seattle Center.** The DEIS transportation analysis estimates that 8% to 11% of event attendees would use transit, which is a conservatively low number appropriate for assessing the vehicular traffic impacts of the arena. However, the goal for transit use that the City establishes in the Arena Transportation Demand Management Plan (DMP) should be higher, with the 25% transit use achieved in Portland being a more reasonable goal. Most buses coming out of downtown Seattle towards the Seattle Center are already at or above capacity during pre-event conditions that coincide with peak commuter hours. Therefore, additional transit capacity is needed to serve pre-event loads. Additional late night service may be needed to serve the higher discharge surge after an event. To achieve higher transit usage, the following mitigation measures should be considered.

a. **Upgrade the Monorail capacity and access –** Until light rail reaches the Seattle Center, the Monorail will provide the best link between the Seattle Center and the transit hub at Westlake. The Monorail can also connect to attendees who work downtown and can leave their cars at work or meet up with others to carpool home after the event. In order to be effective, the Monorail must have capacity to serve pre-event plus commuter service to Seattle Center as well as the post-event ridership surge. The Arena should fund more frequent service runs before and after an event, and make some access improvements at each station as part of required mitigation.

b. **Subsidize Monorail trips for event ticketholders –** To maximize use of the Monorail, consider a program, similar to that just implemented by the Seattle Mariners, for which rides on the Monorail are free for ticket holders.

c. **Use shuttles or custom bus service to regional hubs –** Before light rail service begins, consider using dedicated shuttles or custom buses to serve destinations with high numbers of event attendees that do not have direct access to the Seattle Center without an out-of-direction transfer downtown (e.g., Kirkland or Northgate). Additional bus capacity should also be implemented for routes to Ballard and the University District that were shown to be well above capacity with event conditions.

d. **Reduce impact to transit speed and reliability** – Transit that serves or passes through the Uptown and South Lake Union neighborhoods should not be delayed by event-related congestion. Transit priority treatments along key corridors (e.g., 1st Avenue N and Denny Way) may be needed to retain transit speed and reliability along affected routes.

e. **Improve pedestrian access to the Aurora Avenue Transit Hub –** When the SR 99 Tunnel is complete, the existing Aurora Avenue N (to be called "7th Avenue N") will be transformed into a seven-lane arterial with transit-only lanes in both directions. A transit hub will be created on Aurora Avenue N between Harrison and Thomas Streets, and many transit routes will be moved into this corridor. The walking route between the Arena and this hub along Thomas and/or Harrison Street alignments should be upgraded with sidewalk improvements, better lighting, wayfinding, and real-time transit information.

f. **Incentivize use of transit for Arena employees and staff and construction workers–** Arena construction workers and Arena event staff should be encourage to use transit or other non-vehicle modes. The City/Seattle Center should extend programs developed for Arena staff to employees and staff of other Seattle Center venues.

2. **Manage and Enforce Transportation Network Company (TNC) Use.** Ridehailing through phone-based applications has increased substantially in recent years. While ridehailing reduces parking demand, it can increase congestion particularly for events when all traffic is in the peak direction (either arriving before event or leaving after event) and the TNCs make one extra trip with an empty vehicle for every group transported. In addition, if uncontrolled, TNC drivers often block vehicle, transit, or bike lanes during pick-up and drop-off, further disrupting traffic. The DEIS projected that ridehailing could be 15% of the arena event trips in 2020, increasing to 25% by 2035. If this estimate is correct, then the goals of the TMP should be to significantly lower the reliance on TNC's because of their significant impacts especially during pre-event dropoff. Even at 15%, substantial management and oversight of TNC activity will be required to minimize impacts of this travel mode. The following measures should be considered as part of the Arena's Transportation Management Plan (TMP).

a. **Create a TNC hub for pick-up activity –** This hub should be located away from the "front of the arena" on 1st Avenue N where transit should have top priority. Since the post-event

traffic management plans usually favor egress flows, the hub should be located to not impact major egress routes including Mercer Street and Harrison Street while providing for ingress to the hub. Alternatives to consider include the Mercer Garage (with a separate TNC access on Roy Street) or the 5th Avenue N Garage with a separate TNC access to Republican Street). While hubs work best for pick-up activity, it could also improve service and reduce impacts of drop-off activity by helping to match incoming and outgoing rides during the early evening hours when attendees are arriving at an event and area commuters are heading home. The TNC hub(s) should be used for all Seattle Center patrons and events and be marketed to inform all patrons.

b. **Work with TNCs to add "geocoding," "in-app instructions," and "pin drop" features in Applications.** In order to make a TNC hub effective, it must be paired with application-based features. Geocoding is a virtual boundary established by the application that will provide specified instructions to drivers and/or riders within that boundary. For this case, it should be set so that no driver can receive a ride request for anyone at or near the arena unless they are in the designated hub. Pin-drop and in-app instructions are used to direct a prospective rider to their driver, and would be used to direct riders to the hub.

c. **Enforce "No Stopping" in travel lanes, transit lanes, and bike lanes.** The Arena proponent should fund frequent and visible enforcement should be used when the Arena first opens, and then when needed thereafter to thwart illegal drop-off and pick-up maneuvers. The City should review infraction fees related to such maneuvers and consider raising the fines on activity that impedes high-priority functions such as the blocking of transit lanes.

3. **Optimize traffic flow on major access/egress routes.** Private vehicles are expected to be used by 63% to 68% of event attendees in the short-term (2020) decreasing to 35% to 41% by 2035 once light rail is extended to the Seattle Center. It will be imperative that the primary access and egress routes function well in the short term, and that measures are implemented to shorten the length of the trips and reduce the amount of unneeded circulation associated with searching for parking. Improvements and traffic management strategies should focus on these key corridors: Mercer Street, Denny Way, SR 99, Dexter Avenue N, Harrison Street, and 6th Avenue N.

   a. **Complete Adaptive Signal Systems on Denny Way and at future SR 99 connections.** These projects would implement advanced signal control on Denny Way and at the key grid intersections of SR 99 (including intersections on Dexter Avenue N, Aurora (7th) Avenue N, 6th Avenue N and 5th Avenue N, all of which are part of the Arena's primary access routes. Other private developers have contributed to these adaptive signal upgrades on a pro-rata share basis or as part of traffic impact fees. It is appropriate for the Arena to also contribute proportionate share funding so that the improvements can be in place prior to opening day.

   b. **Optimize Adaptive System on Mercer Street for pre-and post-event conditions.** The existing signal system on Mercer Street relies on maintaining vehicle detection systems, which may need repair over time. In addition, progression algorithms may need to be modified to optimize flows during pre-and post-event conditions. The Arena should allocate some funding to monitor and update the Mercer Street system at least annually.

   c. **Optimize SR 99 on and off-ramp intersections for peak event flows.** There are regional and neighborhood wide benefits of directing as much vehicle traffic as possible to the future SR 99 corridor. Pre-event vehicles that use SR 99 instead of Interstate 5 (I-5) reduce the merge and weave conflicts in the most congested segment of I-5 between SR 520 and I-90.

Use of SR 99 also reduces the length of trips through the South Lake Union neighborhood.

With completion of the SR 99 Project, the primary northbound exit from SR 99 will be at Republican Street and the primary southbound exit will be at Harrison Street. Intersections along Dexter Avenue N, 6th Avenue N, and 5th Avenue N between Mercer Street and Denny Way must be able to accommodate the peak event flows. Of particular concern to the Mercer Stakeholders is the intersection at Republican Street/Dexter Avenue N since inadequate capacity could cause northbound off-ramp traffic to queue into the SR 99 tunnel. The DEIS analysis showed that this intersection would operate at a very poor LOS F in 2020 under the No Action condition and at LOS E with Alternative 1. However, there was insufficient information in the EIS to understand what geometry was assumed for this intersection and why conditions would improve between the No Action and With Project conditions. Interim analysis performed by WSDOT suggests that Dexter Avenue N must have five vehicle lanes (two lanes in each direction plus a left turn lane) to accommodate future traffic flow. The Arena team must coordinate with WSDOT and SDOT related to the optimal configuration needed along these key SR 99 connection points and access routes.

d. **Update and augment wayfinding.** The SR 99 project will change how traffic enters and exits this corridor. Signage on SR 99 north and south of the vicinity should be changed to direct motorists to the optimal route based on the end-of-trip parking location.

e. **Modify and augment web directions.** The Seattle Center and Arena team should work with web-based navigation applications (GoogleMaps, Bing, etc.) to modify and augment directions, and provide optimized routing based on parking garage location. Links to directions should be provided as part of parking reservation systems described below.

f. **Modify 1st Avenue N to prioritize transit functions.** The DEIS suggests that 1st Avenue N could benefit by moving the protected bicycle lane to the west side of the street. This would reduce conflicts along the east curb in front of the Arena but may require that parking be removed from the west side of the street. The Mercer Stakeholders support this change **if** it is paired with a business parking program in the 1st Avenue N garage that mitigates for the loss of on-street parking (see 4.d. below).

g. **Modify 2nd Avenue N for egress flows.** Recent changes to implement a protected bike lane on 2nd Avenue south of Denny Way affect the post-event egress routes from the 1st Avenue N garage. With additional parking capacity under the new Arena, this route will be critical to egressing the area and reducing the challenge for patrons to find alternative routes through the Uptown neighborhood when exiting these large garages. Geometric modifications and/or movable barriers should be considered to maintain a two-lane egress route on 2nd Avenue N.

4. **Implement parking management programs that reduce on-street vehicle circulation.** The Arena plans to construct between 200 and 450 new on-site parking spaces that would be near the existing 650-space 1st Avenue N garage. The presumption in Alternative 2, that use of the 1st Avenue N garage would be capped at 400 spaces, is unrealistic unless those spaces are permanently repurposed for a non-parking use. Concentrated parking can exacerbate traffic congestion by forcing traffic onto fewer access and egress routes. We encourage the Arena to rethink its need for the full 450 additional parking spaces, and investigate partnerships with private parking facilities to supply parking for the 15-year period before link light rail is extended to the Seattle Center. This will prevent the neighborhood from have excess parking in the future and help transition users away from dependence on automobile travel. In addition, parking strategies that help neighborhood businesses

during non-event periods would mitigate for likely loss of parking along key access routes such as 1st Avenue N. The following measures should be considered:

a. **Reduce number of new parking spaces built under Arena.** Although many surface lots that used to support Key Arena have disappeared, literally thousands of new parking spaces have been constructed within 1/2 mile of the Seattle Center as part of private development projects. Partnering with these developments to provide event parking would disperse traffic to a wider area and reduce some congestion related to concentrated parking supply. It also prevents over-supply conditions in the future when light rail service begins, which may tempt some to utilize it for commuter parking.

b. **Prioritize use of Mercer Garage for art-group patrons.** On days with scheduled arts events (e.g., opera, ballet, theater), those users should have priority use of the Mercer Garage. If paired with a reservation system (see 4.c. below), then any excess spaces not used by arts groups by a cut-off date could be made available to other users.

c. **Implement advance reservation/payment system for parking.** Having a guaranteed space eliminates the need for drivers to circulate to find parking or a better parking price. Such a system can also provide motorists with advance travel routing matching origin and destination of trips along the optimal routes. Consider incentives for drivers to arrive early or stay late such that travel peaks are reduced and local businesses may benefit. Explore ways to include other parking facility owners in the advance reservation system or parking marketplace.

d. **Implement short-term parking program in 1st Avenue N and/or Mercer Garages.** Many of the other modal recommendations (e.g., 1st Avenue N improvements, transit staging) could remove on-street parking used by everyday customers to Uptown businesses. This could increase traffic circulation in the neighborhood on non-event days as customers look for parking or negatively affect customer perceptions of the neighborhood. The City, Seattle Center, and Arena proponent could implement an off-street short-term parking program similar to the program that WSDOT implemented in Pioneer Square and along the Waterfront that mitigated parking losses for the SR 99 project. WSDOT's program offered short-term parking (4 hours or less) in garages at a rate commensurate to the cost of on-street parking, and included substantial marketing and business linkages to the program. It is currently operating in six garages, three of which have substantial event-related parking associated with the stadium district. The parking in these garages is used to serve non-event needs most of the time, and then reverts to event-only use a few hours prior to events.

e. **Implement shuttles or circulator routes and incentives connecting to parking in South Lake Union, Denny Triangle or downtown.** Event attendees could be enticed to use remote parking if it is linked to the Arena with a convenient shuttle.

f. **Manage parking at Seattle Center for all.** Programs implemented for the Arena should extend to all users at the Seattle Center, and include non-event days.

5. **Improve pedestrian connections.** The DEIS estimates that pedestrian trips would range from 8% to 10% in 2020 decreasing to 6% to 8% by 2035. We disagree that pedestrian trips would decrease in the future given the expected growth in the surrounding neighborhoods. Furthermore, nearly all patrons who access the Arena by any mode become pedestrians for part of their trips. Those who drive and

park will walk from parking areas, those who take a TNC would walk to and from a future hub, and those who take transit or light rail would walk to the station. More emphasis on improving pedestrian accessibility must be included in the mitigation plans. Some suggestions include:

a. **Incorporating pedestrian crossing protocols in the adaptive signal systems.** Primary pedestrian routes to transit hubs, the TNC hub, and parking garages should be identified and pedestrian crossing protocols established within the signal timing algorithms.

b. **Improve Thomas Street crossings.** The Arena redevelopment will re-orient itself to Thomas Street, which is currently mostly back-of-house functions. We applaud this change to direct more pedestrians to this Green Street corridor that will ultimately connect from I-5 to Puget Sound. The Arena should be fully responsible for signalizing the intersection of 1st Avenue N/Thomas Street and contributing to funding a traffic signal at Dexter Avenue N/Thomas Street to facilitate walk-in trips to the Arena.

c. **Improve lighting and pedestrian facilities along primary walking routes to the Arena.** This should include larger curb bulbs at main crossing intersections, wider sidewalks as well as better lighting along primary walking corridors such as Thomas Street, Harrison Street and 2nd Avenue N.

d. **Update and augment wayfinding.** Wayfinding that directs event attendees to and from transit hubs, rideshare hubs, bicycle parking, and vehicle parking should be updated and augmented.

6. **Detail full mitigation plan including timing and responsibility.** We request that the proposed mitigation plan be more fully developed in the Final EIS with a matrix listing all of the transportation measures that the Arena should be required to implement prior to opening day or contribute a funding share. The FEIS should also detailed specific actions for the Traffic Management Plan and Demand Management Plans.

We hope that you will consider our recommendations and adopt them as part of the Arena mitigation program.

Sincerely,

Mercer Corridor Stakeholders
(List of Supporters Attached)

Attachment: Organizations and Businesses that Support Letter's Position

Community Organizations		
Deborah L. Frausto Seattle Center Arena Chair **Uptown Alliance**	Kyle Ducey President **South Lake Union Comm. Council**	Danah Abarr Executive Director **SLU Chamber**
Ellen Monrad Chair **Queen Anne Community Council**	Martin Henry Kaplan, Architect AIA Land Use Review Committee, Chair **Queen Anne Community Council**	Mary Montgomery President **Magnolia Community Council**
Todd Leber Chair **Seattle Center Advisory Commission**	Tom Freidman President **Ballard District Council**	
Businesses and Non-Profit Organizations		
Paul Wohnoutka Sr. Director, Operations **Allen Institute**	John Schoettler | Vice President | Global Real Estate & Facilities **Amazon.com**	Molly E. Schlobohm Vice President of Sales/Service **Argosy Cruises**
Slade Bedford Deputy Director, Global Facilities **Bill & Melinda Gates Foundation**	Scott Rusch VP, Facilities & Operations **Fred Hutchinson Cancer Research Center**	Rob Swartz Senior Vice President,PNW Region **Kilroy Realty Corporation**
Marty Griswold Executive Director **One Reel**	Ellen Walker Executive Director **Pacific Northwest Ballet**	Stan McNaughton Chief Executive Officer **PEMCO Insurance**
Kevin Malgesini Managing Director **Seattle Children's Theatre**	Aidan Lang General Director **Seattle Opera**	John Bradshaw Managing Director **Seattle Shakespeare Company**
Steve Bragalone Director of Operations **Space Needle, LLC**	Mike Stanislaus Director, Office of Facilities **UW Medicine – South Lake Union**	Ada M. Healey Vice President, Real Estate **Vulcan Inc.**
James Lobb Executive Director **Pottery Northwest**		