May 5, 2016

Via e-mail and regular mail

Seattle Department of Construction and Inspections
Attn: Public Resource Center
700 5th Ave, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019
Via e-mail: PRC@Seattle.Gov

Re: Port of Seattle Comments on the Draft EIS (DEIS) for Expedia Campus,
Project #3021854

Dear Ms. King:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Expedia Campus. The Port supports the economic activity and vibrancy aspects of Expedia’s proposal for an in-city campus headquarters. Since the 1980s, when the Port sold Terminals 88 and 89 to Immunex (later Amgen), the Port, City and County have recognized the benefits of the campus development, including: increased tax revenue, improved waterfront access and safety, a draw for other high tech firms to locate nearby, growth management advantages of limiting urban sprawl, and positive impacts on local businesses. Their proposal, known as the Immunex Headquarters Project (later updated as the Helix Campus Project, reference DEIS page 2-8), envisioned a total development of 1.3 million square feet of mixed uses including labs and offices. This proposal is different.

Bigger Plans: The Expedia Campus Major Phased Development proposes up to 1.95 million square feet, a 50% increase, in an office setting, accommodating up to 8,000 employees (Appendix E, Table 15), plus visitors and deliveries. This proposal would bring approximately twice the number of employees to this site than would have been on site under the Helix Campus Project. It’s also notable that the full number of employees anticipated under the Helix Campus Project never actually came to the site.

Adjacent Port Terminals: Sandwiched between Elliott Bay and the mainline rail tracks to the east, the Expedia site is constrained to a single vehicle access via the two-lane Galer Overpass, which also serves several Port terminals. Our terminals include Terminal 91 (T-91) to the northwest, plus Terminal 86 grain loading facility to the south, with Expedia Campus in the middle. T-91 is our 200-acre facility which serves multiple customers, inclusive of Piers 90 and 91, which is the homeport for the commercial fishing fleet, and Smith Cove Cruise Terminal our two berth facility on P91 expected to process 750,000 passengers this cruise season. Additionally, T-91 includes significant acreage for which the Port has considered redevelopment options, and is currently considering industrial and/or commercial redevelopment.
Traffic Concerns: We are graviy concerned about the limited analysis completed so far regarding interactions with Port activities, especially the cruise terminal operations, the underlying assumptions of transportation impact analysis, and the lack of mitigation proposed for the project’s 8,000 employees. Due to the deficiencies described in this comment letter, we believe that the transportation analysis currently provided for in the DEIS fails to meet the legal standards for an adequate EIS under the requirements of the State Environmental Policy Act (SEPA). Please find below our major concerns on the DEIS, with additional comments in the attached matrix, Attachment A, incorporated herein by reference.

Summary of the Port of Seattle’s Comments on the DEIS

The Port of Seattle’s marine terminals in north Elliott Bay are critically located on the shoreline and rely upon road and rail infrastructure serving the Ballard Interbay Northend Manufacturing and Industrial Center (BINMIC). The Smith Cove Cruise Terminal, the Terminal 91 (T-91) fishing and other industrial uses, planned development of the T-91 Uplands, and Fishermen’s Terminal on the Ship Canal are all accessed from the 15th Ave W/Elliott Ave arterial spine and Major Truck Street. The Galer Street Flyover was built to improve access to these properties (excluding Fishermen’s Terminal), and the Amgen/Immunex campus. The Port contributed $1.6 million and dedicated real property to construction of the flyover.

We believe this environmental review is inadequate for the proposed expansion described in the Expedia Campus DEIS in the following ways:

1) The non-SOV employee mode share assumptions in the DEIS are unrealistic. The EIS assumes SOV rates fall from the existing rate in Bellevue of 59% to the 2031 Full Build rate of 30%. We believe the shares allocated to SOVs and parking are unreasonably low while the shares to transit, bicycling and walking are unrealistically high. The employee vehicle trips are undercounted based on these assumptions, and transportation impacts are understated. An updated transportation analysis with more realistic vehicle trip generation rates/mode shares is required to fully disclose potential impacts.

2) The DEIS’ cruise sensitivity analysis does not adequately account for cruise traffic as an existing condition. It fails to address the severe impact of Expedia trips on the main access point to our Terminal 91, the Alaskan Way W and W Galer St intersection for both our maritime industrial and cruise tenants. In addition, the sensitivity analysis is insufficient to disclose the likely adverse transportation impacts because it analyzed only two intersections. Existing cruise ship operations occur on weekdays, and would be adversely impacted by this development, yet appropriate mitigation to mitigate these likely significant adverse environmental impacts has not been proposed.

3) Necessary mitigation actions are not adequately identified in the DEIS, nor has the proponent identified specific implementation commitments. Since necessary mitigation actions are not adequately identified and specific implementation commitments are absent, decision makers cannot reach reasonable conclusions regarding mitigation given the current level of analysis provided.
Attachment A, “Port of Seattle’s Comment Matrix,” includes additional important issues identified in review that emphasize deficiencies with the DEIS analysis that must be addressed before the City makes further decisions regarding this project. This cover letter emphasizes the most critical matters, but the additional substantive comments in the matrix should have been addressed in the DEIS and we request the proponent respond by releasing a revised transportation impact and mitigation analysis for review by the Port and public, and providing additional comment responses in the Final EIS (FEIS).

1. Undercounting of Employee Vehicle Traffic:

*The significant transportation impacts of the increased square footage proposed are not sufficiently disclosed, since the employee trips are undercounted: SOV and parking mode share assumptions are low and transit, bicycling and walking forecasts are higher than is realistic.*

Appendix E, Table 15, Mode of Travel by Employment Density, shows varying modal rates.

- SOV rates fall from existing rate at the Expedia Campus in Bellevue of 59% to 2031 Full Build of 30%. The DEIS (p. 38) quotes the ITE Handbook on trip generation suggesting that SOV percentages can be adjusted down for a site in a dense urban environment meeting 6 conditions. Those not met at the Expedia Campus include “if the site is:”
  1. surrounded by compact urban development;
  2. consisting of a mix of complementary land uses; and
  3. located in an area with high vehicle occupancy as a result of an area-wide TDM program or preferential treatment for ridesharing.

The ITE Handbook also notes that a charge for on-site parking is another factor to suppress SOV rates, and Expedia has not committed to charging employees at the market rate. Without adjacent compact urban development, no mix of land uses complementing office workers, no commitment to charging market-rate parking, and without an area-wide TDM program, the SOV rates are very aggressive.

- The parking demand forecast draws from SOV, car- and van-pools, and visitor parking needs. Without sufficient parking being available on-site, employees may demand nearby off-site parking, either promoting new commercial lots or haphazard parking anywhere possible. Moreover, when employees park off-site, they are generating vehicle trips not accounted for in the transportation impact analysis.

- The transit capacity analysis does not tie back to the origins/destinations of employees. If routes do not fit the employee need for minimal transfers, reliable rides, and reasonable trip length, they will not use transit.

- In the full build, 2031 scenario, there’s a reference to Link Light Rail, which is not proposed to be built until 2038 in this corridor. The DEIS falls back to continuation of a shuttle system, but does not commit to a shuttle system’s feasibility nor implementation, particularly at the large scale required to achieve the high transit/shuttle mode shares identified in the DEIS.

- The Walk/Bike Share grows from 7% (2% walk/5% bikes) to 13% (3%/10%) from No Build to Full Build. The growth in bike share is attributed to employees moving over time such that bicycling
would be easier. However, the only capacity analysis in the DEIS was for the Elliott Bay Trail route to/from the south. Access to the north must be studied, as well as constraints on accessing the site from the east by bicycle (Thomas and Galer include ramps for bicycles, but the Helix Bridge has stairs and an elevator to reach the overpass).

The proponent should revisit analysis given of SOV rates in recognition that: the ITE recommendations are not met; induced demand for parking or informal/kiss-and-ride drop-offs could increase trips beyond what was considered in the analysis doesn’t reflect the full information needed to ensure employees will use transit; and there is limited capacity on bicycling facilities. Proponent should provide a full transportation analysis that reflects a more realistic SOV mode share.

2. Cruise Sensitivity Analysis

The Sensitivity Analysis of cruise day traffic is insufficient to disclose potential transportation impacts, with only two intersections analyzed. The study intersections in the southern portion of the study area are relevant to a cruise day analysis because they are used by cruise patrons and provisioning trucks.

Existing cruise ship operations occur on weekdays, and would be adversely impacted by this proposed development. Yet, they are not included in the baseline analysis; they are described as “add-on” traffic to be managed. The EIS understates the impact on the cruise industry by focusing on Fridays as the primary concern and states that Expedia employee traffic generation is lowest on that weekday. While it is correct that Fridays are currently the busiest cruise day, there are 50 weekdays in 2016 that will have at least one ship call, including one Monday with a dual ship call. The cruise schedule is available at this link: http://www.portseattle.org/Cruise/Pages/default.aspx. Cruise activity is not an uncommon occurrence and should not be treated as such. Additionally, the cruise industry demand in Seattle is strong and continues to grow each year, both in number of passengers, number of homeport ship days, and in size of ships.

We request that the cruise day sensitivity analyses in the EIS traffic analysis (for both one and two ship calls) be expanded to include study intersections 1-2 and 4-15. Additionally, the cruise day sensitivity analysis should include appropriate traffic LOS analysis methods to accurately account for the congested conditions on Mercer Street and Denny Way (see POS comment matrix comment #2). Any potential transportation impacts during cruise days should be disclosed; feasible, implementable mitigation measures should be recommended. These mitigation measures should be sufficient to mitigate the likely adverse environmental impacts of the proposal and full funding should be provided from the proponent.

3. Unmitigated Significant Adverse Traffic Impacts

The proposed mitigation in the DEIS for transportation impacts in the vicinity is inadequate.

If the City of Seattle chooses to approve the Expedia Campus Major Phased Development after reviewing the environmental documents, then the proponent must be required to implement extensive mitigation to lessen some of the impacts. The proposed mitigation measures are woefully inadequate in mitigating impacts on the operation of Port of Seattle facilities at Terminal 91. They consist of a Transportation Management Program for Expedia staff and active management of “add-on” cruise traffic on the days on which it occurs. Necessary mitigation actions improving the ITS and physical
infrastructure supporting access to Terminal 91 and the proposed development are not identified in the DEIS and there are no implementation commitments. Since necessary mitigation actions are not adequately identified and specific implementation commitments are absent, decision makers cannot reach reasoned conclusions regarding appropriate mitigation given the current level of analysis provided. Comment 14, attached, summarizes transportation mitigation that must be included. These mitigation commitments should be added to Section 1.4, Mitigation Measures. The mitigation should detail who is responsible for the cost, and whether the commitment is for the full cost or a share of the cost.

**Conclusion**

The Port of Seattle supports revitalization of the former Immunex/Amgen Campus; there is much to like in the proposal. Our concerns are the extent of additional square footage proposed by Expedia and the lack of disclosure of potential impacts, leading to an utter lack of mitigation measures that improve the ITS and physical transportation infrastructure on roadways, intersections and the bridge providing access to the proposed campus development. There is a high risk to the city’s and the state’s cruise ship industry if the paper plans for a Transportation Management Program don’t work, and the pre-existing economic activity is gridlocked by transportation congestion. The Draft EIS falls far short in providing decision makers with the information they need to discern appropriate development levels and determine which adverse traffic impacts cannot be mitigated. Based upon the concerns we have expressed in this letter about the deficiencies in the environmental review process, we request that the City require the project proponent to undertake additional environmental review to address our concerns.

Thank you for the opportunity to comment on the DEIS. We look forward to on-going coordination with Expedia so that the Port and Expedia can remain successful neighbors. Please do not hesitate to call Geraldine Poor at (206) 787 3778 if you have questions about this letter.

*Sincerely,*

Geraldine H. Poor  
Regional Transportation Manager

Attachment A: POS’s Comment Matrix of Comments on Expedia Campus Draft EIS, 3/21/16  
Attachment B: Cruise homeport hourly schedule and economic impact

cc: City of Seattle: Torgelson  
Port of Seattle: Pulsifer, McFadden, Collins, Utterback, McLaughlin, Lyles, Goodwin, Gellings, Wolpa, Merritt, Meyer, Blomberg, Wolf
## Comment

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<th>Comment Number</th>
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<td>1</td>
<td>22</td>
<td><strong>2031 Background Growth Assumption.</strong> The EIS assumes a 0.4% annual growth rate based on historical growth in daily trips across the Ballard Bridge. This assumed future growth rate is fundamentally flawed for the following reasons:</td>
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<td>• The 0.4% assumption is substantially lower than the traffic growth expected from the pipeline projects (up to 3.4% at some intersections as shown in Table 6 on Page 20), suggesting a sudden slowdown in development between 2019 and 2031.</td>
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<td>• The 0.4% assumption is substantially lower than the annual traffic growth forecasted across the Ballard Bridge (0.9-1.7%) in Seattle’s Comprehensive Plan Draft EIS published in May 2015. The Comprehensive Plan is modeled using a regional travel demand forecasting model that includes build-out of the growth targets adopted by Seattle and the other jurisdictions in the Puget Sound Region between today and 2035. This result suggests that Seattle’s recent growth boom is expected to persist for some time into the future.</td>
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<td>• Forecasts developed for an EIS should include all reasonably foreseeable projects under the long-term (cumulative) analysis scenario. The Port has had longstanding plans to develop the Uplands area (the area located north of the Magnolia Bridge between the BNSF tracks and Magnolia Greenbelt), which would be accessed via the Magnolia Bridge and Galer Flyover. This reasonably foreseeable project should be assumed for the 2031 analysis. Based on a review of the growth in traffic, it is not apparent that development in the Uplands was assumed.</td>
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<td><em>We request that the EIS traffic analysis be updated to assume background growth rates consistent with the pipeline projects and/or Comprehensive Plan growth rate as well as specifically account for development in the Uplands area (reasonable assumptions of the potential land use in that area to be provided by the Port).</em></td>
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<td>24</td>
<td><strong>Existing Intersection Level of Service.</strong> Table 8 suggests that the level of service along Denny Way and Mercer Street ranges from LOS A to LOS C. These corridors are key to the Port as they are used by cruise patrons and provisioning trucks to reach T-91. The LOS reported in Table 8 does not accurately reflect observed conditions. These corridors routinely experience long queuing and high intersection delays, which are not described in the EIS. The existing congestion suppresses the volumes that can move through each intersection. These low traffic counts result in good level of service results when using a static analysis tool like Synchro. Using a traffic simulation model is the only way to accurately evaluate traffic impacts in congested areas like Lower Queen Anne.</td>
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<td>While not definitive evidence of inaccurate results, the image below reflects “typical traffic” conditions from Google Maps at 5:25 PM, which in turn uses INRIX speed data to depict speeds along key corridors. It is not reasonable to...</td>
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state that the LOS on Mercer or Denny is A-C conditions given the congestion that is clearly evident in the corridors during typical commute conditions. (Note that the Google Map data reflects the “typical traffic” option and does not include anomalies like the Alaskan Way Viaduct closure.

We request that the EIS traffic analysis be updated to use a simulation model or other appropriate methodology to accurately depict traffic congestion along the Mercer and Denny Way corridors. Based on the results of the more accurate traffic modeling, the impacts of the Expedia Campus should be disclosed along with specific mitigation measures that can be implemented by the developer or the City.

We also request corridor travel time analyses for trips on two segments of Elliott Avenue/15th Avenue: 1) Mercer to Galer and (2) Galer to Ballard Bridge, in order to better understand how Expedia Campus traffic will impact the travel times on this important corridor in both 2019 and 2031.

Transit Load Factors. The transit load factor methodology used in the EIS does not accurately reflect rider experience. The EIS uses the average ridership per trip over the corridor rather than the peak ridership segment. Ridership along 15th Avenue NW is heaviest between Leary Way and downtown Seattle in the peak commute direction. In particular, transit capacity near the Amgen site is often limited with no seats available and the D Line occasionally passing riders by due to overcrowding.

We request that the transit load factor analysis be updated in the EIS traffic analysis to reflect load factors on the peak segment of the transit corridor. The
new analysis may trigger a transit capacity impact that must be disclosed along with specific and implementable mitigation.

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| 4    | Mode Share Assumption. The EIS assumes that Expedia will achieve a 49% SOV mode share in the year of opening based on Amgen’s historic travel characteristics and TMP goal. This is an optimistic assumption given that Amgen’s employees had a different residential distribution than Expedia’s. There is no basis to assume that Expedia’s SOV mode share will be 10 percentage points below its current mode share of 59%. The SOV mode share could be higher than 59% because transit service to the new site is not as convenient as to the current site.

We request that the EIS transportation analysis be updated to assume a 59% SOV mode share, consistent with Expedia employees’ current travel behavior.

| 5    | Trip Rate Comparison. The EIS compares vehicle trip rates per parking space between the new site and the Bellevue site in Table 19. Daily vehicle trip rates per space are 2.36 at the Bellevue site and expected to drop to 2.20 in 2019 and 2.12 in 2031. While we acknowledge that Expedia is expecting a decrease in SOV commuting and hopes to use limited parking to achieve the lower SOV mode share, there is no justification of why there would be less vehicle turnover (number of times a vehicle enters and leaves a given parking space) than exists today. What is Expedia going to do differently to affect the factors that influence parking turnover? For example, would Expedia restrict driving offsite to attend meetings, limit the number of vendors parking, not provide visitor parking, etc.?

If the trips generated per parking space were to remain the same as today’s condition, it would suggest an additional 424 vehicle trips in 2019 and an additional 778 vehicle trips in 2030 over what was assumed in the EIS. Moreover, we would expect the vehicle trip rate could be higher than that stated for the Bellevue site for the following reasons:

- The Amgen site is more isolated than the Bellevue site. For example, employees can easily walk to nearby amenities from the Bellevue site (lunch, errands, extensive transit service, etc.), but would likely have to drive from the Amgen site for many of these purposes.
- Pickup and drop-off at the Bellevue site occurs at the front of the building so is not captured in the Bellevue site data provided. In other words, the vehicle trip rate per parking space is understated due to the method used to collect data which only captured vehicles that entered the parking garage. These types of trips do not appear to be accounted for in the EIS (i.e. carpool drop-offs, Uber etc.). Even if pickup/drop-off does not use the Galer flyover, these trips must be accounted for on Elliott Way as they may not otherwise be traveling on Elliott Way and are thus a traffic impact.
- Vehicle trips associated with “spillover” parking are not accounted for. Some employees may choose to park in the existing commercial parking lots along Elliott Way or elsewhere and then access the site via the Helix
pedestrian bridge. These types of trips do not appear to be accounted for in the EIS. Moreover, there is no allowance for the potential that additional private parking lots could be developed along Elliott Way to accommodate the parking demand from Expedia employees given the relatively small amount of on-site parking available.

*We request that the EIS traffic analysis be updated to assume no change in the number of vehicle trips generated per parking stall (e.g., assume the vehicle trip rates remain the same as they currently are in Bellevue). We also request that additional vehicle trips stemming from drop-off/pickup and spillover parking be accounted for in the EIS traffic analysis and any new impacts be identified and mitigated appropriately.*

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| 6    | 47, 70 & 77 *Ballard-Downtown Light Rail.* The EIS says that no shuttles would be needed for the Full Build condition if Sound Transit’s ST3 program includes a Ballard-Downtown light rail line. Based on Sound Transit’s recently released proposed project list, such a line would not be in place until 2038, seven years beyond the Full Build horizon year of 2031.

*We request that the Final EIS remove references to the Ballard-Downtown light rail line as potentially serving Expedia employees by 2031. Additionally, we would like to see a more accurate description of Expedia’s impact on transit capacity (see comment #9 below).*

| 7    | 68 *Cruise Day Sensitivity Analysis.* The sensitivity analysis of cruise day traffic is insufficient to disclose potential transportation impacts, with only two intersections analyzed. The study intersections in the southern portion of the study area are relevant to a cruise day analysis because they are used by cruise patrons and provisioning trucks.

*We request that the cruise day sensitivity analyses in the EIS traffic analysis (for both one and two ship calls) be expanded to include study intersections 1-2 and 4-15. Additionally, the cruise day sensitivity analysis should include appropriate traffic LOS analysis methods to accurately account for the congested conditions on Mercer Street and Denny Way (see comment #2). Any potential transportation impacts during cruise days should be disclosed and feasible, mitigation measures capable of being accomplished.*

| 8    | 68 & 78 *Cruise Day Mitigation.* The EIS acknowledges that additional mitigation would be needed on days with a dual ship call and Full Build employment levels, but no specific mitigation is provided. Mitigation should not create additional adverse impacts upon Port operations, for example, limiting access to and from the grain terminal.

*We request that the EIS traffic analysis identify that Expedia or the City of Seattle will develop, and implement, a Traffic Control Plan, with a commitment to collaborate with the Port on monitoring and revisions to the Plan, as needed. Operational mitigation, such as funding for additional airport charter buses to maintain existing frequencies in light of longer travel times to/from the airport,*
Transit Capacity. The EIS projects 6,000 daily transit trips by 2031. For comparison purposes, the D Line currently serves nearly 12,000 daily trips and the other routes along 15th Avenue NW have 2,000-3,000 daily trips each. Therefore, the projected increase in transit trips is equivalent to two standard fixed-route bus lines or a 50% increase in a RapidRide D line service (or roughly equivalent to the daily trips of the RapidRide B line). This substantial increase in demand would overwhelm the transit system and as stated in the EIS, accommodating this demand would “require either increased public transit service or a robust shuttle system” (p. 70). This statement suggests a transit capacity impact, but no mitigation is provided.

We request that the EIS transportation analysis clearly identify a transit capacity impact and provide a detailed and implementable mitigation including whether Expedia will commit to purchasing service from Metro or fully funding a shuttle system that can accommodate the transit demand. Given that Expedia is relying on transit to meet their mode share goals, a lack of commitment to provide the required transit capacity would suggest that the mode share goals are unrealistic and that additional adverse traffic impacts may result.

Bike path capacity. Table 26 summarizes level of service along the Elliott Bay Trail in 2019 and 2031. The table indicates that the trail LOS would drop from LOS E on an average July day under No Build to LOS F with the Full Build. However, the subsequent text does not identify the likely adverse environmental impacts caused by the project on an average July day.

We request that the EIS transportation analysis explicitly identify the trail LOS impact caused by the project in 2031 as well as propose mitigation to address the lack of capacity. We also request an analysis of the section of the trail to the north of the site—a section which runs through Port property and will likely be heavily used by Expedia employees. Based on the lack of analysis in the EIS, it is unclear if there are also trail LOS/capacity impacts on this section. Additional capacity improvements may be required to mitigate increased bicycle volumes.

Concurrency Analysis. The Growth Management Act (GMA) requires that a development’s impact on the existing transportation system be evaluated. However, the EIS uses 2008 traffic counts to assess impacts—stale data that will be more than a decade old by the project’s year of opening.

We request that the EIS transportation analysis be updated to revise the concurrency analysis to reflect the project’s effect using the 2019 No Build traffic forecasts as a baseline as this will more accurately depict how the project’s traffic will impact defined screenlines when the project comes online. This analysis will suggest if SDOT needs to address any capacity shortfalls within 6 years of the opening of the campus, meeting the intent of the GMA transportation concurrency requirement.

Construction traffic: Construction traffic analysis does not demonstrate adverse construction impacts to area traffic, nor does it explain adverse impacts
for each phase of construction. Similarly, it does not speak to cruise day traffic. Further, it does not describe Expedia employee plus construction worker trips for future phases when buildings are occupied.

We request that proponent provide analysis of construction traffic impacts for all phases of development to account for conditions when the site is simultaneously occupied by employees and under construction, as well as interfacing with cruise ship traffic. Expedia should commit to mitigating potential impacts to cruise ship operations by limiting construction operations and road closures on cruise day mornings.

| 13 | General | Transportation Management Program. The EIS states that the TMP will be amended to account for the MPD. We have reviewed the TMPs on file with the City and see that the TMP was revised in March 2015 to accommodate the change in use anticipated for the “Future MPD”. We would like confirmation from Expedia and the City that the 2015 TMP will be further revised to reflect the EIS findings and mitigation commitments. For example,

- the bicycle amenities (10 showers, 100 lockers, and 93 parking stalls) is inadequate to serve the number of bicycle commuters assumed in the EIS;
- the one-zone transit subsidy is inadequate given that a large share of employees will live outside the City of Seattle;
- there are inconsistencies between the program elements listed in the TMP and those listed in Table 29 (Page 78) of the DEIS
- The maximum parking ratio exceeds the proposed parking supply in the EIS.

The current TMP also states the following potential measure: “Adoption of a back-stop off-site mitigation program: if target SOV is not achieved over time, despite full opportunity to implement all TMP measures, then owner would contribute fair-share payments to corridor trip management measures undertaken by the City.” This measure is inadequate and does not allow any effective recourse if Expedia fails to meet the SOV mode share goals. Instead, the Port requests that the TMP include a provision that Expedia demonstrate it is achieving its stated SOV goals by phase before it is permitted to continue construction of its subsequent phase.

We request that the TMP be updated to reflect the commitments and needs identified in the DEIS as well as a condition stating that mode share goals must be achieved before beginning subsequent phases of construction. Also see comment 15. We also request that the Port be notified of any future substantive changes to the TMP.

| 14 | General | Mitigation. We request that the Final EIS include the following clarifications and conditions related to the proposed mitigation to address transportation impacts:

- Expedia will bear the full cost of the Galer Flyover/Alaskan Way signalization.
- Expedia will bear the full cost of developing a Traffic Control Plan for
cruise days, operational costs of implementing the Plan, as well as commit to periodic monitoring (at least annually) of the Plan in collaboration with the Port.

- Expedia will commit to sufficient mitigation when additional impacts of construction are exposed; this could include a commitment to no construction hauling on days with homeporting cruise ships.
- The city will require that a draft Traffic Control Plan be developed in collaboration with the Port prior to the Expedia Campus being occupied.
- Expedia will coordinate with Metro for transit improvements, such as construction of a RapidRide Station that is consistent with Metro standards for RapidRide stops with more than 150 daily boardings at W Prospect Street that can accommodate both Metro buses and private shuttles.
- Expedia will pay for pedestrian improvements at Elliott Way and W Prospect Street to accommodate the increase in transit riders (and potentially users of the private parking lots) crossing Elliott Way; and for bicycle improvements where needed to improve bicycling capacity.
- Expedia will monitor the Transportation Management Plan annually, including mode share and traffic counts, and make the monitoring report available to the Port and the public.
- As part of the Transportation Management Plan, Expedia will commit to charge all employees market rate prices for parking.

| 15 | General | **Major Phased Development Master Use Permit Conditions.** The Port would like to see conditions included in the Major Phased Development Master Use Permit that would preclude the ability for Expedia to develop additional project phases (e.g., construct and occupy additional building space) unless Expedia is meeting the TMP mode share and vehicle trip generation goals. In this way, there would be a defined mechanism for the City of Seattle to limit undisclosed transportation impacts to the Port and other landowners in the study area if Expedia cannot meet the conditions of the TMP. Without this condition, while Expedia may earnestly try harder to convince their employees to drive less, there is no recourse for the Port of Seattle or others who depend on reliable transportation in the area to address the transportation impacts caused by thousands of new employees at the site. |
| 16 | General | **Ongoing Coordination.** The Port has an interest in close coordination with Expedia as site plans are developed so that both Expedia and the Port can remain successful neighbors. We would like to initiate periodic coordination meetings to ensure the Port is aware of Expedia’s plans as they reach a higher degree of specificity, particularly with regard to development of the TMP and the cruise day Traffic Control Plan. |
Provisioning* and Logistics

Typical Homeport Cruise Day
6:00am ..........Ship arrival
7:00am ..........Provisioning (all day)
• 25,000 pounds of beef
• 25,000 pounds of fresh vegetables
• 10,000 bottles/cans of beer
• 2,100 pounds of lobster
• And (literally) tons more
7:30–10am ...Disembarkation of passengers
11am–3pm .....Embarkation of passengers
4:00pm ..........Ship departure

All this done in 10 hours!

*Based on current ship size

Attachment B: Expedia Campus DEIS: POS comment letter
Current Local Economic Impact

- $372 million annual business revenue
- $16.6 million annual state & local taxes
- 3,934 Jobs

Each time a homeport ship docks it contributes $2.2 million to the local economy.

75% of Cruise Passengers Flew Through Sea-Tac International Airport