# DEIS Comment Letters

## Projectwide Community and Arts Organizations

ALLIED ARTS

April 28, 2022

Dear Sound Transit Board,

**Allied Arts of Seattle's comments on the DEIS for the Sound Transit West Seattle and Ballard Link Light Rail Extensions**

For almost seven decades Allied Arts of Seattle has advocates for great public places and a vibrant arts community. We are very concerned how some of the proposed alignment in ST's current DEIS would negatively impact public spaces and as well as private spaces which all residents enjoy.
Sound Transit will change the face of Seattle for at least the next century, so we must plan and build for the long term. This may require the ST board to make politically difficult short-term decisions to extend deadlines and redesign aspects of the project in order to create far superior long-term outcomes. ST showed such leadership in the past by delaying the Airport and UW alignments; we trust the board will show such leadership again. Below are the comments by Allied Arts of Seattle on the DEIS.

**1. West Seattle Junction alignment west of Duwamish River**

We strongly oppose all the alignments with viaducts and/or massive bridges and we support the alignments with tunnels.

- **Seattle learned how a viaduct along our central waterfront was a disaster for the public realm. Let's not make that same mistake again.** Massive light rail viaducts (a.k.a. "elevated LRT alignments") with huge stations looming over the area below are just barely acceptable along I-5 or in a gigantic parking lot like at Northgate. The West Seattle context is far more comparable to the Roosevelt neighborhood or Beacon Hill neighborhood, so tunnels are the appropriate choice here.
- **In particular, a viaduct and large elevated transit station with their shadows, columns and noise are not appropriate so close to the heart of the West Seattle Junction.**
- **A huge, towering bridge over the neighborhoods of south Delridge is not appropriate.** The proposed LRT bridge over Delridge is comparable in scale to the existing West Seattle High Rise Bridge, so it would be completely out of scale here. Also, your outreach for this area is disturbingly limited. ST did not speak to the businesses in the office park affected by the Delridge options, including the largest daycare center in West Seattle.

**2. Ship Canal Crossing and Ballard**

We strongly support the alignments with tunnels and we support a station at Downtown Ballard.

- **The tunnel options have fewer long-term impacts to the built environment.** Please see the comments described in section #1 above regarding viaducts vs. tunnels.
- **Ballard LRT should directly serve downtown Ballard.** The EIS should include an underground station which directly serves downtown Ballard. This is a choice between short term cost-savings to build transit infrastructure which poorly serves an existing urban village vs. a station with excellent access to an existing urban village and bus routes.

ALLIED ARTS

**3. Chinatown / International District Station area**

We strongly prefer the 4th Ave S alignment over the 5th Ave S alignment. The 4th Ave S Alignment will:

- **Eliminate cut-and-cover construction on 5th Avenue in the Chinatown International District.** The CID has suffered from the impact of many construction projects over the years. ST's proposed construction project would be the most severe construction project affecting this vibrant community of color in decades.
- **Create superior multi-model transit connections** providing direct, internal connections between all light rail lines and Sounder commuter rail.
- **Return Union Station to its original function as a transit hub** and allow countless people to enjoy this architectural gem.

Thank you for considering our comments to help ensure that Sound Transit improves rather than degrades the neighborhoods and communities it will serve for at least a century. We trust that Sound Transit will make decisions that will make Seattleites proud of and love their city and its light rail system. We welcome further conversation on these important decisions.

Sincerely,

Allied Arts of Seattle Board
Laine Ross, Co-President
David P. Allen, Co-President

cascade BICYCLE CLUB

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To: Sound Transit
Date: April 28, 2022
Re: West Seattle to Ballard Link Extension DEIS

Dear Sound Transit:

Cascade Bicycle Club (Cascade) appreciates the chance to comment on the West Seattle to Ballard Link Extension Draft EIS. Cascade advocates for the ability of everyone who chooses to bike, to do so simply, safely and intuitively. We recognize that the lack of safe and intuitive routes is a key barrier to biking for people of all ages, abilities and backgrounds. Cascade has around 10,000 members, mostly residing within the Central Puget Sound region. Many of our members look forward to having more transportation choices, as ST3 brings affordable, reliable and equitable transit across the region.

A key component for biking to be more seamless and safe is the need to provide safe routes to access transit via active transportation. Sound Transit's own projections indicate that nearly 87% of the projected ridership of over 500,000 people will walk, bike or bus to access this high capacity transit. Given this ridership and people's growing preferences, improving access to transit via active transportation is critical.

Realizing multi-modal ridership will require collaboration with local agencies, and as such we encourage close collaboration between Sound Transit and the City of Seattle to proactively unlock all of the community benefits of high capacity transit. Between densifying and allowing for more housing - including affordable housing - and building complete multimodal networks at and around station areas, there is much planning work that must be started now.

**Specific to the WSBLE DEIS, we request that In the next phase of planning, Sound Transit please study the following areas:**

1. **STUDY: Active transportation integration for all stations**

   Create a plan to identify and fund simple, safe, protected, bike connections to new stations. Investing in direct bike connections into the existing Seattle Bike Network is what the voter-approved System Access Fund is for.

   Fund projects that are beyond the station envelope but that will fill gaps in the multi-modal network. Whether it's finally connecting the Ship Canal Trail to the Ballard Bridge or completing long-standing gaps in the bike network around the Delridge station – or

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numerous other projects that would multiply the numbers of people able to arrive at Link Light Rail by bike, a plan will enable strategic use of dollars toward the intended goal.

Up and down the planned WSBLE line alignment are separated bike trails and connected bikeways that should connect to the new stations. Within the active transportation integration plan study how to create seamless connections to routes including:

- Burke Gilman Trail
- Ship Canal Trail
- Elliot Bay Trail
- Center City Bike Network
- SODO trail
- West Seattle Bridge trail/Waterfront Trail

These connections must be maintained during the construction window (see below, #2), and a plan is necessary to leverage this existing Seattle bike network spine for station access. Partner with the city to do this work – don't just rely on the city to do it. Sound Transit stands to benefit from this work being done.

New station areas must improve the current biking conditions, not degrade them. That's only going to be possible by studying how the active transportation system will interact with the station area and the many transportation modes arriving at the station. Where new station areas border the existing bike network, consider how station access for transit, as well as pick up and drop off, could degrade the safety and comfort of the bike route; ensure the bike facility is meaningfully upgraded with physical separation from cars.

We recognize that the breadth of issues the DEIS must address means that there are analysis limits. However, the bike mode share projections for stations are well below the "possible" and appear to use the status quo area mode share. If the mode share data uses the current Seattle Bicycle Master Plan, then it should be noted it was developed in 2014, prior to ST3 ballot measure formation or approval. The BMP is currently being updated and connections around ST3 stations will doubtless look different than in the 2014 plan. To take just one example, Sound Transit's bike mode share of 2% for the Ballard station is well below what we would expect if meaningful bike connections are prioritized and completed prior to opening. We expect that these bike mode share projections are not used as foundational in planning for bikes, since such a status quo projection would become a self fulfilling prophecy if used to guide planning and investments.

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Finally, on System Access Funding, we prefer that funds be used to grow ridership for the 100 year investment, not for mitigation measures during construction. Mitigation is important, but the intent of the dollars within System Access is for permanent improvements.

2. **STUDY: Construction impacts to the existing bike network, and mitigation plans**

   Make plans in the next phase to limit construction impacts to existing bike routes. For example, impacts to the SODO trail and West Seattle Bridge trail appear almost inevitable. Taking the next step in evaluating construction impacts now means that alternate routes can be advanced in design and construction ahead of the closure of these, and other, key bike routes. Partner with the city to do this. Waiting until just ahead of the construction window is too late and leads to hastily put together detours that add an unreasonable distance, feel unsafe, or involve people biking on sidewalks for long distances without consideration of how bikes and pedestrians can co-exist safely.

   There are numerous examples during ST2 implementation of hastily developed detours thrown together in the weeks ahead of construction crews needing to close bike routes for literally years. The results have been people on bikes put in dodgy situations and/or sharing narrow sidewalks with pedestrians in high pedestrian traffic areas. We must learn from ST2 and this is one area to address differently and proactively.

3. **STUDY: Bike parking needs for the entire line. Develop a plan that reflects current and future needs, by station type, and is informed by how people integrate the bike into their regional transit trips.**

   Develop a plan to accommodate the needs of people who want to “bike and park” at stations. This starts with truly understanding the needs of people who bike and park at stations, and people who bike and bring bikes aboard. We provide the following ideas to study:

   - Think beyond individual stations downtown, where station area envelopes are tight. Perhaps a couple of downtown bike parking hubs will better serve people parking bikes downtown than the smaller amount of parking at each station.
   - Locating bike parking on the mezzanine level of stations is impractical for all station users.
   - Bike parking should be free and abundant.

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- The bike parking plan for this new line should include robust research to better understand the parking needs of people using bikes and Link Light Rail.
- Partner with the city to identify opportunities for collaboration to support shared bike parking accommodation needs, and the broader goal of removing barriers to more people biking – one perineal barrier being a lack of secure covered bike parking.

Accept and embrace that people will continue to bring bikes on trains – and make it work for everyone. Necessity, not preference, typically dictates whether people will bring their bike aboard, and we need to build system capacity to reflect this reality. A region-wide system often requires people to transfer to another mode after their Link trip; for people who bike, that means they need to bring their bike along. Irrespective of station depth, the ability to access platforms with a bike must be seamless and efficient. That said, the greater the depth the higher the chances _without intentional planning - of challenges for people with bikes in hand. For example, switching elevators midway down to the platform is counterintuitive for all users – and with a bike in hand it's even more challenging. The addition of runnels on stairs on the Northgate extension line were appreciated, but the design needs finessing to be functional for all but the most physically able, with the most conventional and light bikes. E-bikes and cargo bikes are growing in popularity and will continue to do so – Sound Transit must design for their safe and seamless use in stations in order for people to access the trains.

Thank you for your thorough considerations of many alternatives, throughout the environmental and community input processes. We look forward to continuing to partner with Sound Transit in service of creating a world-class high capacity transit system. We stand ready to collaborate on solutions for the issues we have outlined above.

Sincerely,

Vicky Clarke, Policy Director
Cascade Bicycle Club

CC:
Alex Kreig, Director of Access & Integration, Sound Transit

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Kristen Simpson, Interim Director, Seattle Department of Transportation
Elliot Helmbrecht, transportation Policy Advisor to Mayor Harrell, City of Seattle

**Contact**
Olivia Holden
Program Director
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206-613-3257

April 27, 2022

Lauren Swift
Sound Transit
401 S Jackson St.
Seattle, WA 98104

**RE: Commute Seattle Comments on the WSBLE Draft Environmental Impact Statement**

Dear Ms. Swift,

Commute Seattle writes to you in response to the West Seattle and Ballard Link Extension (WSBLE) Draft Environmental Impact Statement (DEIS).

At Commute Seattle our mission is to foster mobility partnerships and services to keep Seattle moving and thriving for all. Through education, advocacy, training, and consulting, we are helping create a mobility-supportive business culture to ensure that commuters enjoy world-class benefits and amenities. Our vision is a more livable and thriving Seattle metro region underwritten by broad community commitment to climate-friendly mobility choices.

Commute Seattle empowers commuters, employers, and property managers to take climate-friendly travel options with Transportation Demand Management (TDM) strategies like transit pass incentives, Pre-Tax benefits, parking management, and commuter education. We support businesses with compliance regarding local TDM policy like the Commute Trip Reduction Law, Master Use Permit Transportation Management Program agreements, Commuter Benefits Ordinance, and more. Commute Seattle convenes the Downtown Transportation Alliance (DTA) to bring together private and public sector thought leaders and decision makers to approach opportunities and challenges collaboratively and ensure effectiveness.

Over the last decade, Seattle alone has added over 160,000 new jobs and Sound Transit Line 1 currently moves more than 80,000 weekday passengers per day to their jobs, doctor's appointments, and daily needs. Mass transit is a critical component in combating climate change and building generations of wealth. Mass transit connects communities and saves lives. WSBLE is expected to increase ridership 15 to 30 percent, which can decrease vehicle miles traveled (VMT) by 3 percent. To achieve this, we need a light rail system that is built for its most vulnerable users. Transparent and thorough engagement will be key to a successful delivery of the WSBLE. Project decisions deserve the highest quality of research, design, implementation, and transparency to ensure that our collective vision can be achieved. Therefore, Commute Seattle outlines the following comments regarding ST3 planning and the preferred alignment for the WSBLE.

**Comment 1: Invest in alignment options that bring stations as close to the surface as possible.**

Deep transit stations are not only expensive, but they also cause barriers for riders, especially for those making short trips, for riders transferring, and for people living with a disability. With most driving trips being under a mile, people require fewer barriers to get out of their personal vehicles and into a climate-friendly mode.

**To build a system for generations, Sound Transit must:**

- Install Ultra-High-Speed elevators from the surface directly to the platform if the route proves no other option other than a deep transit tunnel through downtown. No rider should need to transfer from one elevator shaft to another or to an escalator to reach the platform from the surface and vice versa.
- Build stations based on the population growth data from the Puget Sound Regional Council and for the ridership we need to achieve climate goals.
- Build multiple access points to handle ridership capacity and alternative entry and exits.
- Employ human-centered design strategies from the start of project development.

**Comment 2: Invest in TDM strategies in all phases of the project, particularly during construction and especially in areas with vulnerable populations and disenfranchised communities. Commute Seattle requests Sound Transit to establish a construction mitigation plan devoted to:**

- Establishing community-centered coordination committees in each station project area and centering BIPOC voices in project outreach and engagement.
- Maintaining and prioritizing sidewalk accessibility to ensure ADA compliance and safe routes to school throughout construction. Soliciting expertise from people who have low-to-no vision and/or use a mobility device. Speaking with schools and parents regarding school day transportation and after school activity travel.
- Avoiding impacts to transit, especially fixed rail transit or bus service with no adequate detour route. Providing more if not equivalent transit service in areas and for transit-dependent riders that are acutely impacted.
- Communicating the project to employers, residents, and visitors; offering staff time to execute presentations and be available for questions. Offering incentives to businesses and non-governmental organizations to encourage and facilitate transit ridership.
- Establishing requirements for maintaining access to venues and businesses in construction contract documents.
- Providing real-time and advance-notice information on traffic movement, detour routes, and access. Marketing the tool effectively to the community and employers.
- Implementing public education measures and creative marketing ideas that promote access and attractiveness of venues and businesses.
- Proactively working with the maritime and freight industry to define suitable alternative routes. Building off existing relationships with maritime to effectively communicate alternative routes.

**Comment 3: Build community confidence and ensure the project can be built on time, under budget, and of the highest quality.**

- Developing a robust communications plan that is built with the community. Employing creative marketing and public education campaigns to build project awareness and excitement.
- Uplifting people, local businesses, and arts and cultural venues with project storytelling.
- Overcommunicating the project timelines and any project constraints.
- Developing a department to establish community-building and project education that is made up of community representatives for the most impacted groups.
- Establishing a land bank program to proactively revert land acquired for project construction back to the community, especially in areas with BIPOC and traditionally disenfranchised groups.

We appreciate your commitment and dedication to delivering climate-friendly travel options for generations to come. We look forward to working together as we deliver the West Seattle and Ballard Link Extensions.

Sincerely,

Olivia Holden
Program Director
Commute Seattle

feet first
promoting walkable communities

April 28, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Thank you for this opportunity to comment on the West Seattle-Ballard DEIS. Feet First is Washington's statewide organization advocating for pedestrians and walkability. Every Link ride begins and ends with a walk or roll. Our evaluation of the proposed Link extensions to West Seattle and Ballard identifies opportunities to enhance both pedestrian access and safety. We believe it is to locate stations near to centers of pedestrian activity, with safe and convenient access to services and transit connections.

- We believe the overall alignment choices should be re-evaluated without the financial subarea equity constraint to ensure that stations will be located ideally for pedestrian access, especially at the terminal stations in Ballard and West Seattle. Each must serve the neighborhood center directly, while also serving as a primary feeder bus connection point.
    - **Ballard:** The proposed locations at 14th NW and 15th NW are beyond a reasonable walking distance from Ballard core destinations and are situated poorly for bus transfers. This may result in low ridership demand and high parking demand, both of which do not benefit the surrounding community. A Link station located at NW Market Street and 20th Avenue NW would serve Ballard more effectively as a destination and would also be within walking distance to far more residents living within a quarter-to-half mile radius of the station. This alternative location is near the center of pedestrian activity and is an ideal location to make transfers to and from existing bus routes without requiring out-of-direction travel of space to lay over.
    - **West Seattle:** The junction is the center of pedestrian activity and the best transfer location with local buses. An elevated structure through the West Seattle neighborhood would have negative effects on the urban design this investment is intended to support.
    - We also support Seattle Subway's recommendation to locate the **South Lake Union** station on Westlake closer to the center of development and believe this option should be considered further, recognizing that riders wanting to access the E line would need to walk further.
- The deep tunnel downtown should not be considered because the vertical transportation will result in long access times, challenging transfers between services, and unreliable elevators and escalators. The ability to make quick and convenient transfers between Link, streetcar, Monorail, and bus lines will largely determine how well the system functions as a network, especially in the initial years of operation where the West Seattle line will not penetrate the downtown.
    - Sound Transit should demonstrate its justification for building a second downtown tunnel. If a single tunnel could suffice it would allow for direct transfers between rail lines and make more Seattle subarea funds available to meet Seattle intra-city circulation needs. It's not clear that two tunnels are needed to operate the proposed service levels

given 6-minute minimum headways in the Capitol Hill tunnel, and the capacity advantages of a second tunnel will be diminished by using through-routes that connect short 7-mile city tails to 40-mile routes to Everett and Tacoma. The analysis should consider every possible operational technique to achieve reliable and short headways before jumping to a higher-cost two-tunnel option.

- If analysis shows a two-tunnel approach is the only feasible option, the International District/Chinatown station will provide critical system connections between multiple transit services and is essential to "get it right." We oppose the deep tunnel station because it will create significant barriers to accessing the station and connecting services quickly and reliably.

- We recognize that a shallow cut-and-cover station in the International District would have significant impacts to that community and have environmental justice implications that need to be considered. If those impacts can be successfully avoided or mitigated, we recommended the 5th Avenue cut-and-cover option be selected, that a "Barcelona Solution" be considered (a station layout with two railway platforms, one on each side of the track), and that east-west pedestrian connections be considered to provide alternative pathways to busy S Jackson St.

- If impacts of 5th Avenue cut-and-cover stations are unacceptable, Sound Transit should consider other tunnel options that do not require deep stations and allow for easy transfers to connecting services.

Thank you again for this opportunity to comment,
On Behalf of the Feet First Board

HISTORIC SEATTLE
Educate Advocate Preserve

April 28, 2022

VIA E-MAIL

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S Jackson Street
Seattle, Washington 98104

RE: Comments on the DEIS for the West Seattle and Ballard Link Extensions Project

Dear Ms. Swift:

On behalf of Historic Seattle, I am submitting these comments on the Draft Environmental Impact Statement (DEIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project.

Established in 1973, Historic Seattle is the only citywide nonprofit and public development authority dedicated to saving meaningful places to foster lively communities. Our three main program areas are Education, Advocacy, and Preservation. We are the owner of ten historic properties in Seattle—these landmarks and National Register-listed buildings are important to the communities in which they are located. We promote good stewardship and understand how challenging and yet rewarding it is to maintain and operate historic buildings. Our buildings provide affordable rents for office, residential, education, community, arts, and cultural spaces.

**Historic Seattle supports the WSBLE project and strongly believes that linking more communities to the existing light rail system will be a great public benefit.** However, no transportation system is perfect. No route alternative meets all needs. All route alternatives have pro and cons. The perspective we provide is from our experience and expertise in preservation. Our comments focus on impacts to above-ground historic resources.

From our review of the DEIS, the most adverse impact to historic resources is to the Chinatown-International District, particularly if either one of the two 5th Avenue alternatives (CID-2a and CID-2b) is chosen. We do not support the 5th alternatives. To be blunt, it's a non-starter. The demolition of buildings in the Seattle Chinatown National Register Historic District and local International Special Review District will forever change the physical character of the CID, displace small businesses and their associated owners and employees, and result in both short-term and long-term economic impacts to the neighborhood. Organizations from the community have commented at length about the many negative impacts to the neighborhood if one of the 5th Avenue

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PHILLIPS HOUSE
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DEARBORN HOUSE
Historic Seattle Headquarters
Built: 1907 | Operated by Historic Seattle since 1997

EGAN HOUSE
Built: 1958 | Operated by Historic Seattle since 1998

CADILLAC HOTEL
Built: 1898 | Operated by Historic Seattle since 2001

WASHINGTON HALL
Built: 1908 | Operated by Historic Seattle since 2009

GARDEN HOUSE
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alternatives is chosen as the preferred alternative. We urge Sound Transit to listen to the community. The Wing Luke Museum's comments are particularly insightful and relevant.

We concur with the DEIS that 525 S Jackson Street (now Bank America; originally Seattle-First National Bank, International District Branch) is eligible for listing in the National Register under Criterion C even though it is noted as "non-contributing" in Seattle Chinatown National Register Historic District nomination from 1986. An amended National Register historic district nomination could revise the period of significance for the district to capture mid-century resources.

If one of the 5th Avenue alternatives is chosen, the district would also lose 418 5th Avenue and the former Uwajimaya building (we're unclear as to the address and cannot find it in the DEIS "Table 4.3.16-4. Effects to Built Environment Historic Properties: Chinatown-International District Segment") but the site is shown as one of three potential transit-oriented development parcels in the Tunnel 5th Avenue Station map.

While not ideal either, the Tunnel 4th Avenue alternatives would have less adverse impacts in the CID. If we had to choose an alternative, we would pick one of the 4th Avenue alternatives over the 5th Avenue alternatives. Sound Transit—please stay off 5th Avenue!

Historic Seattle believes that in addition to the CID, Pioneer Square will also be majorly impacted by this project. We support the comments submitted by the Alliance for Pioneer Square and Historic South Downtown (for Pioneer Square and the CID).

In other neighborhoods, we have concerns for the adverse impacts on the following historic resources:

4045 Delridge Way SW – This significant modern building (originally Bethlehem Pacific Coast Steel Co. Office Building) would be demolished in all proposed Delridge segment alternatives except for the Andover Street Station alternatives. We concur with the DEIS that his building is eligible for the National Register under Criteria A and C. If demolition cannot be avoided, we would like to see some significant mitigation for this loss. See Delridge segment.

1038 Elliott Ave W (Wilson Machine Works) – This significant building is eligible for the National Register under Criterion C and possibly Criterion A. If demolition cannot be avoided, we would like to see some meaningful mitigation for this loss. See South Interbay segment.

1430-1436 Elliott Ave W (Western Pacific Chemical Company) – This significant building is eligble for the National Register under Criterion C and possibly Criterion A. If demolition cannot be avoided, we would like to see some meaningful mitigation for this loss. See South Interbay segment.

105 Mercer Street (Maxine Apartments) – This 1929 brick apartment building in the lower Queen Anne neighborhood is significant. If demolition cannot be avoided, we would like to see some meaningful mitigation for this loss. See Downtown segment.

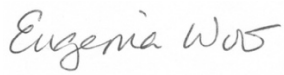
Although not slated for demolition, there are significant impacts to historic resources at Seattle Center if the preferred alternative DT-1 is chosen. The Northwest Rooms (Seattle Landmark), Seattle Repertory Theatre, and other buildings would be most impacted from construction and operation of a tunnel.

Please note that Historic Seattle did our best to review the DEIS at this time. We are also a Section 106 Consulting Party and will continue to provide input throughout the process.

Thank you for the opportunity to comment. We hope to see as few historic resources adversely impacted as possible.

Sincerely,

Eugenia Woo



Director of Preservation Services

## Sound Transit Projects

| Details | Communication |
|---|---|
| **#502897**<br><br>**From:**<br>Chieko Phillips<br><br>**Organization:**<br>4Culture<br><br>**Date Recieved:**<br>4/28/2022<br><br>**Created by:**<br>**Audience**:<br>**Reach**:<br>**Participation**:<br>**Engagement**:<br>**Source**:<br>Online open house<br>**Assigned division**:<br>Outreach<br>**Category**:<br>**Project Phase**:<br>Planning<br>**Project Segment**:<br>**Environmental phase**:<br>Draft EIS | Dear Sound Transit Board of Directors,<br><br>I am writing to you today to advocate for the arts and culture sector as well as local communities that are at risk of displacement due to Sound Transit's expansion based on the Draft Environmental Impact Statement (DEIS).<br>I acknowledge the importance of the West Seattle Ballard expansion of the light rail. I am excited about the opportunities and accessibility new stations can bring and I also urge you to be intentional about protecting the communities that will be most affected.<br><br>Members of the Seattle Arts Commission have identified some key concerns with the current proposed DEIS plan which I will share more about below.<br>Clear and transparent communication with impacted communities<br>Youth involvement<br><br>Displacement of arts and community organizations as well as residents.<br><br>Clear and Transparent Communication with Impacted Communities<br>The city has a commitment to racial equity and we hold you accountable to that commitment. We recognize not only the short-term impacts of construction but also the long-term impacts that light rail has had in the city, resulting in the displacement of communities of color. We call for long-term mitigation measures in this light. We believe mitigation starts with making communication clear, transparent and accessible to the impacted communities in order to empower them to advocate for themselves. With this being a project capable of taking up to ten years, it is imperative that the community is involved in the planning and understands the process and how they will be impacted during and after construction. This can look like classes and training for the community, accessible literature about the planning process, clear processes for commenting on and objecting to the plans, planning meetings that directly involve the most impacted communities and more. Artists should have a central role in planning, development and implementation of this construction project<br><br>Youth Involvement<br>Youth are often overlooked in processes such as these and this is apparent in your plan. We ask that you actively engage youth in this process because ultimately, they will be the people who will most utilize the transit system to access impacted communities. We encourage Sound Transit to create avenues for youth residents to understand and participate in the review process in a meaningful way. Some suggestions on how to accomplish this are through youth forums, internships and other opportunities for compensation; programing, youth councils and community engagement with the arts organizations in the area that have youth programs. We encourage you to create a budget specifically for youth engagement and to pay young people for their time in assisting Sound Transit with planning.<br><br>Displacement of Art and Community Organizations<br>We recognize not only the short-term impacts of construction but also the long-term impacts that light rail has had in the city, especially resulting in the displacement of communities of color. We call for long-term displacement mitigation measures as a show of consideration for the impacted communities. It is also necessary to address these needs through community-led investment that results in community wealth building. This includes station planning and any related development taking into account affordable commercial, community-gathering and cultural space activation during the early planning phase. These spaces that are part of transit-oriented development should be owned and/or managed by an entity with the mission of programming cultural space so those spaces can be appropriately used and accessible to the public. This will help mitigate loss of neighborhood cohesion.<br>I also implore you to listen to our community members in and around the Seattle Center campus, Chinatown International District, Delridge and all other communities impacted by the West Seattle/Ballard Link Extension (WSBLE), as they will be directly impacted by this project. They have explained how this project will have severe adverse impacts and prolonged interruption on their mission-driven work. Please listen to all the organizations in the Seattle Center area, not just the largest.<br><br>Seattle Center and Uptown Cultural District - the proposed route is untenable for many organizations who have been recently impacted by both the pandemic closures and Climate Pledge Arena construction. Please continue to work with them to find a solution and business mitigation measures that will not displace the businesses and cultural organizations that are part of the identity of the Seattle Center area.<br><br>Chinatown International District - the 5th Avenue alternative would result in the highest amount long-term displacement of residential and cultural businesses in the CID. The 4th Avenue alternative would connect into the transportation gateway and provide potential opportunities for use of Union Station and pedestrian traffic.<br><br>Delridge - Youth programming is part of Delridge's community identity. Sound Transit can best serve our region's youth by ensuring they are involved in these planning processes. Sound Transit should consider outsourcing or building in funding to outsource the management of surplus land dedicated for transit-oriented development, to ensure a focus on community and cultural spaces benefiting and accessible to the public, especially youth.<br><br>I and members of the cultural community believe this project will be successful if the most impacted communities are considered and included in the planning process. We look forward to more transparency of this project and to be in partnership with Sound Transit as planning for WSBLE moves forward.<br><br>Sincerely,<br>Chieko Phillips<br>Arts Commissioner |

## Sound Transit Projects

| Details | Communication |
|---|---|
| **#503127**<br><br>**From:**<br>Joshua Morris<br><br>**Date Recieved:**<br>4/28/2022<br><br>**Created by:**<br>**Audience**:<br>**Reach**:<br>**Participation**:<br>**Engagement**:<br>**Source**:<br>Online open house<br>**Assigned division**:<br>Outreach<br>**Category**:<br>**Project Phase**:<br>Planning<br>**Project Segment**:<br>**Environmental phase**:<br>Draft EIS | Dear Sound Transit West Seattle Light Rail Extension Project Team,<br><br>Greetings from Seattle Audubon. We are a 106-year-old environmental conservation organization that advocates and organizes for cities where people and birds thrive. High functioning public transportation is critical for the future of our city and for reducing carbon emissions from the transportation sector, the largest source of emissions in Seattle.<br><br>We also need to be good stewards of the biodiversity within our city. Urban wildlife face a multitude of threats which can be exacerbated during construction.<br><br>We ask that you please consider the following in the final environmental impact analysis:<br><br>-Please estimate expected tree removal and canopy cover loss for each alternative. This analysis should include descriptions of tree species, size, and a valuation of lost ecosystem services (see Nowak 2018: https://www.fs.fed.us/nrs/pubs/jrnl/2018/nrs_2018_nowak_002.pdf). Include these as performance metrics used to evaluate alternatives.<br><br>-VERY IMPORTANT: Avoid tree removal during nesting and chick-rearing periods for birds. Ideally, do not remove any trees or vegetation between February-August. This will give breeding birds, including the herons in the two nearby rookeries, the best chance to successfully reproduce. The tree removal for the Lynwood Light Rail Extension occurred in Spring 2019, the worst possible time. This demonstrated either a lack of planning or lack of concern for wildlife and the environment. We strongly request that Sound Transit to avoid making this mistake again.<br><br>-Evaluate the scale of opportunities during construction for each proposed alternative to remove concrete and other impervious surfaces to open new plantable space to add trees and vegetation for mitigation.<br><br>-Plan to replace removed trees with at least a 4:1 replacement ratio to help replace lost benefits from tree removal as quickly as possible. When replacing trees, use the largest species appropriate for the area. Favor large conifers which tend to provide more and year-round ecosystem services. Select native species and those that that can withstand stressors from the urban environment and climate change.<br><br>-Build bird-safe light rail stations. Most birds do not recognize glass as a barrier. Transparent and reflective surfaces kill up to one billion birds across North America, making window collisions one of the leading human-caused sources of direct bird mortality. The designs of the big, glassy structures at Husky Station, SeaTac, and others, are disasters from the perspective of bird window collisions. Please use bird safe glass or use collision deterrent treatments/design strategies to reduce collision risk at stations. Seattle Audubon is happy to be a resource.<br><br>-Evaluate options to reduce noise, dust, and lighting during construction and operation. Each of these stressors can diminish quality of life to people, and degrade habitat values for birds and other wildlife. Always shield nighttime lighting and turn it off when not in use--birds are often attracted to bright lights, especially during migration periods, which causes exhaustion, confusion, and increases exposure to urban hazards.<br><br>Seattle Audubon will be pleased to serve as a resource to you. Please don’t hesitate to contact our office.<br><br>Sincerely,<br><br>Joshua Morris<br>Urban Conservation Manager |

SEATTLE GREEN SPACES COALITION
**https://seattlegreenspaces.org**

April 27, 2022

Sound Transit DEIS Comments
Sound Transit Board

Re: Comments on WSBLE and West Seattle Link Extension from SGSC Board

Greetings, Board Members:

Thank you for the opportunity to comment on the WSBLE DEIS. Overall, in this document and its appendices:

- all perspectives pose social equity issues: they favor dominant, wealthier and more privileged groups and geographic areas over less wealthy and privileged groups and geographic areas.
- statements, such as in 5.4.10, indicate that, as long as urban environmental damage has already been done, it is acceptable to do more damage. This is an environmental equity issue.
- though climate change is imminent and dangerous, carbon footprint analysis and natural capital valuation are not mentioned or evaluated in any chapter or appendix, and do not appear as drivers in this document
- all perspectives favor light rail, regardless of environmental issues, topography, or potential disruption and destruction to residents, businesses and ecosystems, and despite availability of other less damaging, high-capacity non-rail transit options.

**4.2.5.3.3: Pigeon Point**

Comment: fails to mention importance of area to the Duwamish people, and Olmsted Brothers recommendation more than 100 years ago to (1) preserve the Pigeon Point view (which all southern alignments would block), and (2) eventually add the area to Seattle's park system. Details: Pigeon Point - West Duwamish Greenbelt – Friends of Seattle's Olmsted Parks (seattleolmsted.org)

**4.2.7.1.2:** Noise, Vibration, Land Uses

Comment: DEIS states because of existing noise levels and lack of public access, area is not considered noise-sensitive. This is habitat for herons and other birds and animals. They are sensitive to noise, and particularly loud noise levels DEIS outlines.

Refer to 5.4.10: SGSC disagrees that if environmental damage has already been done, it is acceptable to do more damage.

**ES-11:** Comment: SGSC prefers No Build Alternative.

Preferred Alternative DUW-1a and Option DUW-1b would have greater park impacts than Alternative DUW-2. Most park impacts would occur in the West Duwamish Greenbelt, which serves as wildlife habitat and visual buffer, and is home to a great blue heron colony. Preferred Alternative DUW-1a and Option DUW-1b would remove trees in the great blue heron management area. Preferred Alternative DUW-1a would also impact habitat enhancements that may occur at the City of Seattle's Bluefield Holdings/Wildlands Site 2. Alternative DUW-2 would avoid impacts to the greenbelt but could impact the Port of Seattle's proposed habitat restoration site at Terminal 25.

**4.2.9:** Impacts on Longfellow Creek and northern West Duwamish Waterway ecosystems

Comment: Both southern alignments would be detrimental to the Osprey and Great Blue Heron nesting areas. While the Osprey nest could potentially be relocated, there is no guarantee that the birds

would accept the new locations. Proximity of major construction work would most likely be detrimental to the Great Blue Heron colony.

The southern alignments should be removed from consideration to avoid these impacts and avoid construction induced shaking.

While the Genesee alignments may try to minimize the Longfellow Creek impact (**see 4.2.17**) by using the portion which is already in a culvert, removal of trees and bushes along Genesee would make it more difficult for wildlife to migrate between the golf course and creek area. This will cause major disturbance to this critical wetland, bird, and salmon habitat. The Andover alignments would also disturb the creek area.

The DEIS should have considered alternative transit technologies more compatible with the unique geographical and habitat challenges in West Seattle.

**4.2.10 –** This DEIS does not properly assess embodied greenhouse emissions from production and use of high (GhG) construction materials (e.g. steel and other metals, concrete, etc.) construction activities (trucks, heavy equipment, etc.), traffic congestion resulting from these activities, and other factors.

This also runs counter to practices described in **Chapter 2.7**.

**4.2.11**: soil conditions along the whole alignment are unstable and/or challenging.

Comment: The northern slope above West Duwamish Waterway is unstable and may collapse during an earthquake. Many large trees which currently help stabilize the hillside, and provide an important buffer are proposed for removal, impacting the wetland buffer.

The Seattle Fault runs through the proposed path of the SODO to West Seattle alignment, from the Kitsap Peninsula through the West Seattle Junction, south Harbor Island, SODO and Beacon Hill. The proposed alignments, with viaducts up to 150 feet tall, pose a high earthquake risk in the fault area. This imperils all green space, residential and commercial properties underneath. Other risks include settling and other earth shifting over time.

The piers for the Lite Rail bridge over the Duwamish River will be placed in very poor soil condition and subject to critical liquefaction during an earthquake. Considering the heights of the pier to be 140' above the river; this could result in significant shaking.

The DEIS should have considered other alternatives, including non-rail, lighter-weight and more seismically stable transit options.

DEIS states that trees removed from Pigeon Point neighborhoods would need to be replaced, but may not be replaced in the same area for safety reasons, impacts in some locations may not be fully mitigated, and removed vegetation could result in a cumulative visual impact.

See also 5.4.10 and 4.2.5.3.3: Duwamish Greenbelt importance to Olmstead Legacy, Duwamish Tribe, and Pigeon Point neighborhood. It is not possible to mitigate removal or re-plant enough sapling trees to replace ecosystem benefits of mature trees in the forested area. Benefits of replanted saplings may not develop until late in, or after the 5-7 year construction period, and the new plants will take 5-10 years to reach a level of maturity similar to those that were removed.

**5.4.7.1 Air quality**

DEIS offers no analysis of ecosystem services, including carbon capture and oxygen production provided by Duwamish Greenbelt forest and adjacent green spaces and trees. This is a factor in mitigating GhG output.

**p.15**: Sound Transit analysis found the regional ST3 system would remove enough single occupancy vehicles (SOVs) from roads to reduce greenhouse gas emissions by more than 130,000 metric tons annually.

Comment: While construction-related carbon output was estimated (Appendix L4.6D) at 158,067-614,461 tons, additional pollution output from SOVs, freight, transit, garbage-recycling, delivery and emergency vehicles idling in congested and delayed traffic for long periods during construction-related traffic

delays, for 5-7 years, was not accounted for. Therefore, construction-related GhG output is inaccurate. Increased pollution affects the health of green spaces and habitats.

There is also no comparison of GhG output in construction and operation of alternative HCT options, such as BRT and gondola, that present significantly lower GhG impacts than light rail.

**5.4.10.1**

**P. 18** : DEIS states that WSBLE alternatives would have a low potential adverse effects on local wildlife populations because of their highly urbanized environment (see **Sections 4.2.9 and 4.3.9, Ecosystems**). Also, there are a few higher-value habitats that support native fish and wildlife species in the study area (Duwamish Waterway, West Duwamish Greenbelt, Longfellow Creek and associated natural area)

Comment: see above – DEIS assumes that, since urban damage has occurred, it is acceptable to create more damage. SGSC disagrees.

**p. 18-19**: DEIS states that removal of large trees and increasing the amount of impervious surfaces would result in cumulative loss of higher-value upland habitat, overall loss of Seattle forested habitat, and reduction in habitat available for West Duwamish Greenbelt bird and animal species. Also, urban development has the potential to further degrade or reduce ecosystems and breeding/nesting and foraging habitats for resident and migratory species.

DEIS offers no calculation or metrics for ecosystem services provided by natural capital (green infrastructure), or losses from their removal (including erosion control and stormwater management, oxygen production and carbon sink, habitat, etc.) and dollar costs for replacing these services with grey infrastructure substitutes.

Long-term loss of natural capital is an equity issue for the Duwamish Tribe and the Pigeon Point community. DEIS also offers no metrics for social impacts of WSBLE proposals.

Seattle's Urban Forestry Commission reports net tree loss for the city every year, vs. the city's goal (2037 Comprehensive Plan) of achieving 30% tree canopy coverage by 2037. Removing more trees is not a healthy, sustainable or equitable action for ST to take.

**p. 19:** Adverse cumulative impacts to aquatic habitat in treaty-protected fishing areas, wetland habitat and wildlife. Impacts expected to be minor after mitigation

Comment: Damage to habitat, watershed, vegetation and local species will occur for 5-7 years during construction, and years before mitigation starts. Therefore, mitigation, including re-growth of ecosystem elements to maturity will take up to 10 years, and DEIS offers no metrics to show that post-mitigation cumulative effects will be "minor" or adequate to replace losses.

**Appendix N.5, Chapter 4.1 and Figure 3-1,** Duwamish Segment: DEIS states, "The WSBLE area of potential effects falls within the western hemlock vegetation zone, which is the most extensive vegetation zone in western Washington."

Comment: The SGSC recommends doing no damage to this area. Therefore, SGSC prefers:

1. the No Build Alternative, or
2. the DEIS should choose:
   a. a light rail route that could avoid causing ecosystem damage, or
   b. other, lower-impact high-capacity transit options.

In community,

John McNulty, Michael Oxman, Mary Fleck, Elaine Ike, Peggy Sturdivant
The Board of Seattle Green Spaces Coalition

## Sound Transit Projects

| Details | Communication |
|---|---|
| **#504950**<br><br>**Date Recieved:**<br>4/27/2022<br><br>**Created by:**<br>Christopher Johnstone<br>**Audience**:<br>General Public<br>**Reach**:<br>**Participation**:<br>**Engagement**:<br>**Source**:<br>Email<br>**Assigned division**:<br>Outreach<br>**Category**:<br>**Project Phase**:<br>Planning<br>**Project Segment**:<br>**Environmental phase**:<br>Draft EIS | To Whom It May Concern:<br><br>The Seattle Housing Authority (SHA) is highly supportive of Sound Transit's effort to extend our light rail system and looks forward to increased opportunities for more affordable housing that improved transit infrastructure can bring to our region. However, as a provider of low-income housing throughout the City of Seattle, SHA is concerned about the loss of low-income housing units within the North Queen Anne neighborhood that would result if the Ballard Light Rail Alignment Preferred Alternative IBB-1a or Option IBB-1b were implemented as described in the Draft Environmental Impact Statement (DEIS).<br><br>A high opportunity neighborhood, North Queen Anne has a relatively low supply of low-income housing stock; within a one-mile radius of a nine-unit SHA community that might be displaced as a result of these two alternatives, SHA only has 13 other units of public housing south of the ship canal serving this desirable neighborhood in Seattle. While SHA has found that replacement housing can be acquired and rehabbed to agency standards at an estimated cost of $400,000/unit in 2021 dollars, the relatively high value of real estate in this neighborhood and annual cost escalation averaging about 10% per year over the last decade would make finding comparable replacement housing in this same neighborhood a considerable challenge. Further, administrative costs, social impact costs on community residents, and relocation costs are all factors that SHA believes should be studied and considered in more detail within the Final Environmental Impact Statement.<br><br>In closing, SHA is enthusiastic about the Ballard Light Rail Extension project and eager to see a project alignment emerge that fully considers and appropriately mitigates affordable housing and other social impacts in the community.<br><br>Sincerely,<br><br>James Mayton (he/him/his)<br><br>Senior Asset Manager<br><br>Seattle Housing Authority<br><br>D: 206.615.3560<br><br>M: 253.209.6181 |

Seattle Subway Board of Directors
% Ben Broesamle, Chief Operating Officer
Seattle Subway
Seattle, WA

April 28th, 2022

WSBLE Draft Environmental Impact Statement Comments
% Lauren Swift, Central Corridor Environmental Manager
Sound Transit
401 South Jackson Street
Seattle, Washington 98104

Sent via email to WSBLEDEIScomments@soundtransit.org

Regarding: Seattle Subway's Official Comment Letter on the WSBLE Draft Environmental Impact Statement

Dear Ms. Swift,

**Preface**

There is a clear relationship between the WSBLE DEIS and Seattle Subway's mission, which is to ensure future renewably-powered, rapid transit is designed and built as soon as possible in order to promote climate justice and in order to allow access to every possible location in our city and region with travel times for transit riders that are competitive with driving, making rapid transit ridership and not car ownership the most convenient option to participate in our region's economy and daily life.

Seattle Subway was incorporated to speed the construction of additional regional expansions of rapid transit and we like to believe we played an important role in organizing the region around

designing the larger Sound Transit 3 package we have today, and in securing voter approval of Sound Transit 3. Sound Transit 3 is a vitally important investment in our future that gives us all the opportunity to move around more of our region conveniently, equitably, and sustainably. However, Sound Transit 3 must not preclude future expansions.

## Introduction

The WSBLE project represents a multi-century investment in our region's renewably-powered rapid transit infrastructure. We want to thank Sound Transit staff for the massive effort that has gone into the creation of this document. We want to thank the Sound Transit Board and regional leaders past and present for the decisions that have brought us here. The decisions we make this year and next will affect our region's future through multiple centuries.

Our focus is on making the entire system a great experience for future riders and future generations of riders, thereby increasing support for the important work the agency does to expand rapid transit to many more destinations in our region. That means that when we evaluate the DEIS, we focus on what will be best for transit riders: maximizing convenience, accessibility, time savings, reliability, and capacity for and feasibility of future expandability.

Seattle Subway is excited to have the opportunity to submit the below comments on the West Seattle and Ballard Link Extensions (WSBLE) Draft Environmental Impact Statement (DEIS).

## Comments

Seattle Subway submits the following DEIS comments regarding WSBLE:

### General

**Comment 1 - a request for clarification regarding future expansion:** Sound Transit's existing long range plan incorporates at least two expansions, from Ballard to the University of Washington; and from West Seattle to Burien via White Center. Has Sound Transit considered additional requirements of increased ridership to WSBLE stations related to the additional riders added by future system expansions? Has Sound Transit considered how to maximize financial and operational feasibility of these future expansions in the designs of the terminus WSBLE stations?

**Comment 2 - a recommendation regarding expansion:** Seattle Subway recommends planning, designing, and building stations in WSBLE for future expansion to other corridors from WSBLE stations including but not limited to all corridors identified in the Seattle Transit Master Plan, as well as those identified in Forward Thrust, and designing vertical circulation for special event crush loads after future expansions are complete.

There are five areas where Sound Transit needs to explicitly future-proof the system:

- South Lake Union: Either the South Lake Union or Denny Triangle Station must be designed with future expansion to the east (King County Metro Route 8 line) and to the North (a North Aurora Line) in mind.

- Sodo: The new Sodo to Duamish segment must be built with future expansion to the south (Georgetown, South Park, Sea-Tac, etc.) in mind.

- Midtown: the segment between Westlake and Chinatown International District must be designed for future expansion to the east along the Madison corridor.
- Ballard: Ballard Station must be built with expansion to both the north (Crown Hill/Greenwood/Northgate/Lake City) and east (Ballard/UW/Sand Point) in mind.
- West Seattle: The West Seattle Line must be built with future expansion to the South (White Center/Burien) in mind.

**Comment 3 - a request for clarification regarding platform depth:** All station platforms presented in the DEIS seem quite a bit deeper than the average platform depth in the existing Sound Transit subway system. The public has not seen any detail of the depths of various obstacles causing station platforms in the new light rail tunnel to be as deep as they are presented in the DEIS. Would Sound Transit please clarify in detail what are the depths of various individual obstacles known today that cause tunnels and new tunnel station platforms to be so deep?

**Comment 4 - a recommendation regarding design of stations & platform depth:** Seattle Subway recommends additional work to make stations as shallow as possible. Where stations are equal to or more than 85 feet deep: Sound Transit should use fast surface-to-platform elevators without mezzanines and design platform alignments so that is possible, build in ample elevator redundancy, and use modern interfaces to ensure nearly seamless elevator use.

**Comment 5 - a request for clarification regarding bus integration:** King County Metro bus operating hours should not be reduced, but instead be reallocated to run as circulators at high scheduled frequencies to connect outlying neighborhoods with light rail, and respond to demand. Would Sound Transit please clarify which stations are designed for the majority of ridership to come from bus transfers and the strategy for station design at those locations to reduce transfer penalties and minimize rider delay?

**Comment 6 - a recommendation regarding bus integration:** Seattle Subway recommends additional work to reduce transfer times between buses and rail wherever possible by reducing travel distances horizontally and vertically to reduce transfer penalties and minimize rider delay.

**Comment 7 - a request for clarification regarding rider safety at wide or busy roadways:** There are a number of major roads with many lanes and with high traffic volumes that separate riders at stations from where they want to go. Examples include 15th Avenue NW in Ballard and 4th Avenue S in CID. Has Sound Transit studied how to maximize rider and pedestrian safety through station access and entry locations?

**Comment 8 - a recommendation regarding rider safety at wide or busy roadways:** Seattle Subway recommends improving rider and pedestrian safety by avoiding situations that require transit riders to cross major, busy, wide thoroughfares as pedestrians.

**Comment 9 - a request for clarification regarding vertical conveyances:** vertical circulation issues in recently opened stations built by Sound Transit like Capitol Hill and Husky Stadium Stations, as well as slightly older stations, like Beacon Hill have reduced rider experience outcomes. Has Sound Transit specified the make and model of vertical conveyances for WSBLE? If so, would Sound Transit please clarify the speed, reliability, amount, and redundancy specifications of vertical circulation at WSBLE stations?

**Comment 10 - a recommendation regarding vertical conveyances:** Seattle Subway recommends Sound Transit ensure specified escalators and elevators are (1) fast and (2) have enough redundancy to handle special event crush loads with ease and not fail riders in the event of single equipment failure. Redundancy specifications should include additional escalators and elevators to allow for future ridership increases beyond current projections during special event crush loads. Redundancy specifications should also include that all stairwells are designed to also be used as egress during regular operation, not just emergency.

**Comment 11 - a request for clarification regarding impacts of travel time on ridership at deep stations:** Ridership does not seem to be affected by station platform heights/depths, and/or overall travel times and transfer times between modes, and/or materially different land uses easily accessible from different station locations located across busy intersections with long signal timing. Additionally, riders have alternatives, using rideshare services or even walking between downtown stations may be significantly faster than using the proposed system when factoring in travel time to proposed platforms' locations and depths. For each platform location and depth option, would Sound Transit please release clarifications and explanations of how the effects of the above listed issues cause increased travel time and therefore limit demand and ridership? If this has not been considered yet, would Sound Transit please update ridership projection models to reflect ridership changes caused by increases or decreases in a rider's total travel time specifically including time to access the platform?

**Comment 12 - a recommendation regarding consolidation or elimination of stations:** The final preferred alternative should include all of the stations in the vicinities approved by voters in 2016. This should be accomplished by neither eliminating nor consolidating stations promised to voters in ST3.

**Comment 13 - a request for clarification regarding construction risk register:** Many large construction projects create a construction risk register in the early planning phase of design to track various project risks to construction budget, timeline, and the project's surrounding environment. The public has not seen a detailed construction risk register. Would Sound Transit please clarify if a construction risk register exists, and if so provide the detail that exists in the construction risk register to support tunnel and platform depth decisions? Specific attention is requested to be placed on: 1. risks leading to deeper tunnels, higher elevated alignments, and deeper or higher station platforms, and 2. risks various issues leading to potentially reduced operational reliability and increasing need for redundancy or other offsets of risks to operational reliability.

**Comment 14 - a request for clarification regarding Supplemental DEIS for portions of WSBLE without delays to other ST3 projects:** Seattle Subway understands there are unsolved constructibility problems and potentially adverse impacts in the DEIS at various specific locations across the WSBLE project. If these problems remain unsolved, a supplemental EIS process may be good for the final outcomes of Sound Transit's WSBLE and may in fact improve rider experience and achieve higher transit ridership over the next multiple centuries, which is absolutely a better outcome. For those specific areas with unsolved problems, has Sound Transit considered how to conduct a Supplemental DEIS process that through segmentation and independent utility would allow the rest of the WSBLE project and ST3 projects to continue as scheduled? Could the SDEIS result in a win-win where there's a

better system for generations of riders, increasing ridership significantly, without delaying the rest of the project—similar to construction of Sound Move, which was built in segments?

**Comment 15 - a recommendation regarding design of stations:** Seattle Subway recommends that Sound Transit make all stations as shallow as possible, design stations for surface to platform elevators, build in ample elevator redundancy, and use modern interfaces to ensure nearly seamless elevator use.

**West Seattle Station**

**Comment 16 - recommendation regarding preferred alternative and additional study**: In West Seattle, Seattle Subway is driven by executing on the Long Range Plan and focused on expansion from West Seattle to White Center and Burien. There is no better option for West Seattle station than the 41st Ave Medium Tunnel Option (WSJ-5) and future expansion. This option is designed in such a way that allows future expansion to the south towards White Center and Burien, and provides a community-supported implementation while controlling cost compared to other tunnel options and maintaining ridership projections. Seattle Subway recommends Sound Transit advance WSJ-5 as the preferred alternative for Alaska Junction, while also studying options for a medium tunnel alignment on either 42nd Avenue SW or California Avenue SW that allow for future expansion to the south. California is the linear commercial core of West Seattle and should be prioritized as the corridor of future expansion southward. Seattle Subway recommends Sound Transit prioritize future expansion southward at this station, California should be the goal location for the expansion corridor and 42nd is one block closer than 41st to California. Regardless of West Seattle station location, it should be designed for future expansion to the south along or near the California Avenue corridor in congruence with the Long Range Plan.

**Avalon Station**

**Comment 17 - recommendation regarding additional study**: The WSJ-5 Avalon station suffers from low ridership and a location where the West Seattle Bridge ramp complex cuts off a lot of its walkshed despite 53% of its 1,200 riders walking to access the station. However, the WSJ-5 Avalon station allows only the “DEL-6” station location. Seattle Subway recommends that Sound Transit rework the “WSJ-5” option in the vicinity of Avalon to allow additional options in Delridge.

**Delridge Station**

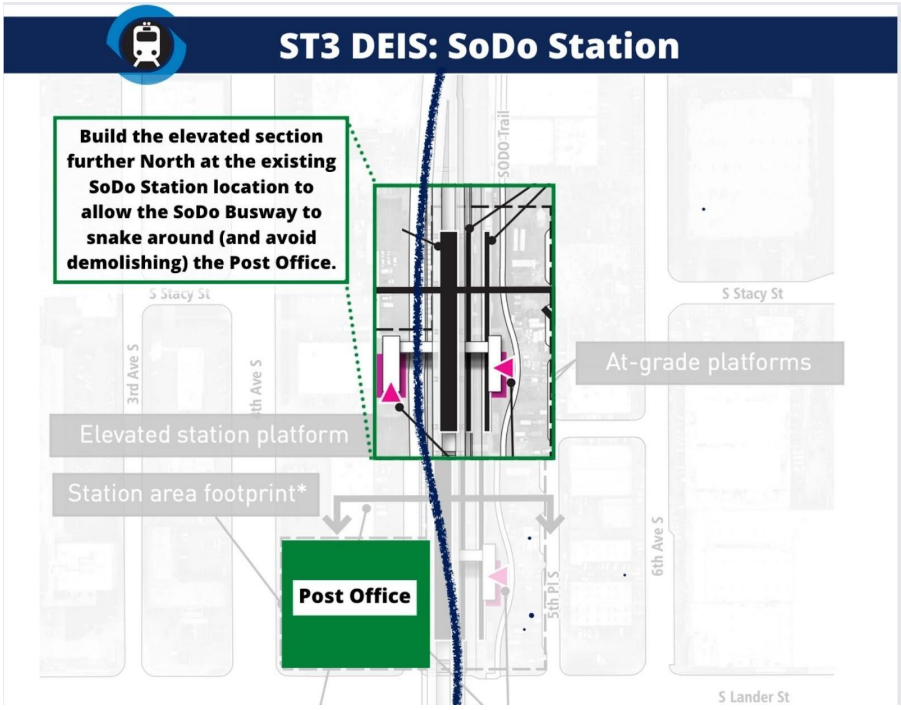
**Comment 18 - recommendation regarding additional study:** The only unfortunate aspect of WSJ-5 is that Sound Transit includes only one compatible option for the Delridge Station: DEL-6, which is far from ideal. DEL-6 abuts a large steel plant and offers mediocre bus connections. Bus connections are perhaps the single most important feature of a Delridge Station and must be excellent. The final design must prioritize the 87% of riders arriving by bus, and prioritize excellent bus-to-rail transfers to provide reliable transit services to the transit-dependent communities south of Delridge. Seattle Subway recommends a fresh crack at this engineering challenge of designing the WSJ-5 to Delridge connection to allow better alternatives in Delridge, and we are confident Sound Transit can find more and better options for Delridge than DEL-6 alone that can be compatible with WSJ-5.

**SoDo Station**

**Comment 19 - recommendation regarding future expansion:** Seattle Subway recommends planning, designing, and building the new SoDo to Duwamish segment for future expansion to Georgetown, South Park, and south King County. Seattle Subway recommends Sound Transit study how this can be accomplished with wye-junction at the point where the SoDo alignment turns towards the Duwamist alignment

**Comment 20 - request for clarification regarding cost projections:** Would Sound Transit please clarify the extent to which the SoDo Post Office facility acquisition affects the cost of each option for the SoDo station by providing the Post Office facility acquisition cost estimate for each alternative?

**Comment 21 - recommendation regarding additional study:** Seattle Subway prefers Mixed Profile Station (SoDo-2) for its preservation of the SoDo busway (which we understand carries 50-70 buses/hour), lack of an awkward car overpass that may have challenges with respect to freight vehicles, and legible direct transfers for all riders. However, Seattle Subway requests Sound Transit study a Mixed Profile Station further north at the existing SoDo Station location to preserve the SoDo busway, and prevent demolishing the Post Office at great added expense. Choose Mixed Profile Station (SoDo-2) and study construction further North at the existing SoDo Station location.

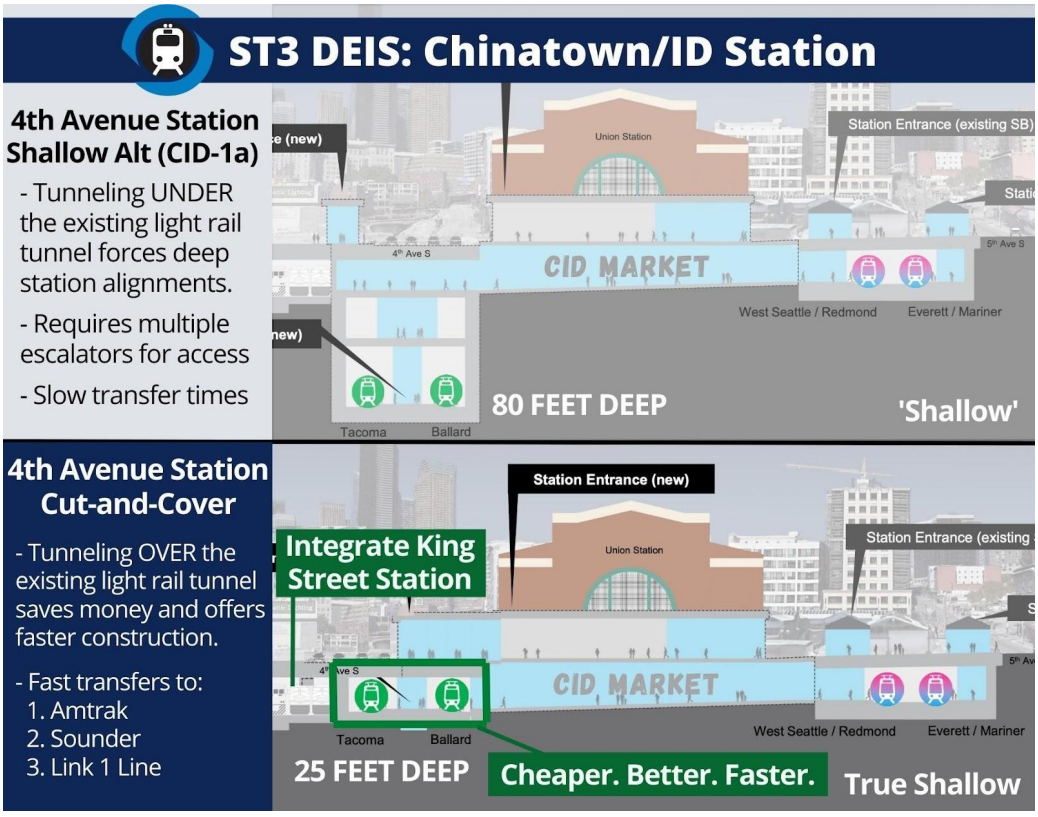



## CID Station

**Comment 22 - request for clarification regarding transfers:** Sound Transit did provide total transfer times between future lines. It is not possible to fully understand the prioritization of transfers at CID, and which transfers to focus on minimizing time penalties, without understanding the number of transfers between various lines and directions. A few hundred

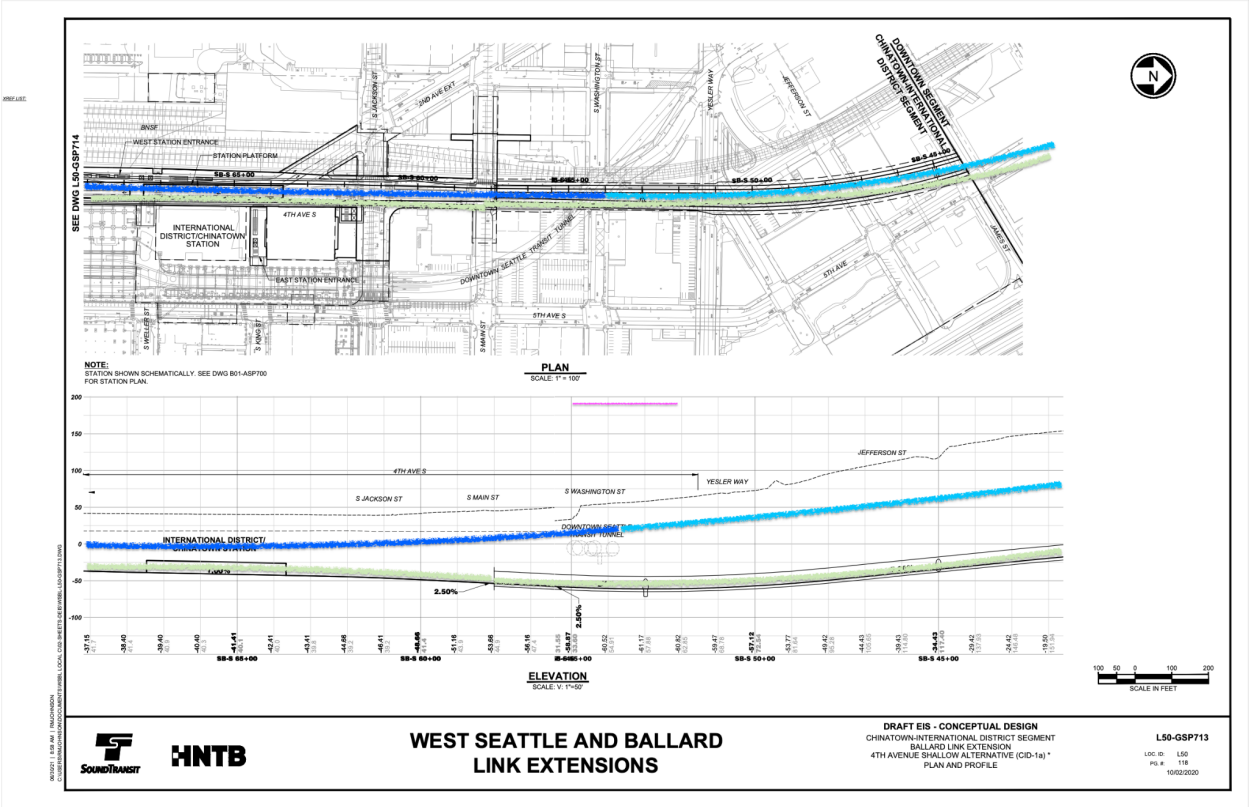
transfers may be ok as difficult, while over 10,000 should be as quick and high capacity as possible. Seattle Subway requests Sound Transit clarify the estimated number of transfers by line and direction between CID Stations.

**Comment 23 - recommendation regarding additional study of an extremely shallow 4th Avenue S Station:** Chinatown/International District (CID) Station is the Puget Sound's single most important central station for its confluence of multimodal connections and transfers. Of the options presented, the best option is 4th Avenue "Shallow Alt (CID-1a)" but we can't recommend it due to the excessively long transfer times. A tunnel just as shallow as the existing CID Station along 4th Ave could be the best option that aligns the needs of stated racial and social justice principles for the neighborhood with the needs of future riders. If Sound Transit can design a way to implement an extremely shallow station on 4th Avenue S it would mean fast transfer times for riders, lower impact to the community around the CID, and likely lower costs and shorter construction timelines. We implore Sound Transit to focus on finding a way to make this potential win/win/win happen at this critical transit station and regional transportation hub. Seattle Subway recommends that Sound Transit select 4th Avenue S with an extremely shallow cut-and-cover alternative alignment based on CID-1a that is as shallow as existing CID station, and include a shallow cut-and-cover tunnel option over existing Downtown Seattle Transit Tunnel, as the preferred CID alternative.




Going under the existing light rail tunnel is a major driver for the problematic tunnel depth we see for WSBLE in CID and Midtown. The solution is an opportunity to study a partial cut-and-cover option in conjunction with an improved 4th Ave viaduct rebuilt over the existing light rail tunnel. Fewer of the neighborhood's housing units and businesses line 4th Ave

between S Jackson and S. Washington Streets. In the diagram of the proposal below: the Dark blue line = New cut and cover (to S Washington Street); the Light blue line = New twin bore; and the Green line = 4th Ave Shallow (CID-1a).




**Comment 24 - requests for clarification and recommendation regarding cut-and-cover construction along all of 4th Avenue S:** Has Sound Transit studied cut-and-cover construction all along all of 4th avenue S? What are the factors that might improve the cost and constructability outcomes of Cut-and-cover construction of the CID station and tunnel if they were extremely shallow along 4th Avenue S? Seattle Subway recommends Sound Transit study cost-effective, and construction-time-effective construction methodology alternatives like cut-and-cover station and tunnel construction to implement an extremely shallow 4th Avenue S alternative.

## Midtown Station

**Comment 25 - request for clarification and recommendation regarding Midtown Station:** Midtown Station is so deep that making it useful or competitive with driving, walking, or rideshare usage will be a challenge. A station in this location needs to be just as good for short trips within downtown as it is for long distance commuting. Our deep stations article (https://seattletransitblog.com/2022/03/15/are-st3s-deep-stations-a-problem/) notes that stations over 100 feet deep need to use fast elevators that skip mezzanine transfers and go directly to the platform surface. Sound Transit responded in a blog post (https://www.soundtransit.org/blog/platform/digging-details-new-downtown-seattle-light-rail-tunnel) that direct station access isn't possible due to the line being directly under 5th avenue. Does Sound Transit assume that it's either not possible to go under buildings at this depth or that the

platform has to be in the center for this station? What happens at Midtown seems to largely depend on what happens with CID station, so our recommendation is somewhat general. Recommendation: make the station as shallow as possible, design station for surface to platform elevators, build in ample elevator redundancy, study direct connections to 2nd and 3rd avenues for riders connecting to other transit routes as pedestrians, and use modern interfaces to ensure nearly seamless elevator use.

**Comment 26 - request for clarification regarding Midtown Station and future expansion to the east and recommendation:** Has Sound Transit analyzed how to design the Midtown station to accommodate transfers or direct integration of a future rail fixed guideway system expansion to the east along the Madison Street Corridor? Seattle Subway recommends considering future rail fixed guideway system expansion along the Madison High Capacity Transit Corridor identified in the City of Seattle's Transit Master Plan.

**Westlake Station**

**Comment 27 - requests for clarification regarding Westlake Station and recommendation:** Seattle Subway wishes it were better able to give detailed feedback for Westlake station, but Sound Transit seems to have only completed one design option for the 5th Avenue alignment. However, as we note in our transfers article (https://seattletransitblog.com/2022/03/31/st3-transfers-must-be-excellent/), this station has slow transfers and multiple, detailed options for this location seem unusually-under-studied for a station that expects nearly 74,000 daily riders. Would Sound Transit please present any additional study that Sound Transit completed to reduce multiple alternatives for a 5th Avenue alignment Westlake Station to the final presented DT-1 option, and tradeoffs of each of those?

**Comment 28 - requests for clarification regarding Westlake Station:** Unfortunately, it appears transfers will be slow at three or four minutes for the 23,000 daily riders who need to transfer at the Westlake Hub. Details of what makes this station perform so poorly from a rider experience perspective are hard to discern. The station appears to be deeper and more complex than necessary. Would Sound Transit please provide a more detailed explanation of how this station was designed and how the choices for the presented alternative were made?

**Comment 29 - recommendation regarding Westlake Station:** What we can say is that the station as-designed will be a poor experience for riders. Seattle Subway recommends that Sound Transit improve this station design with an eye on making transfer trips and access to the surface as fast and seamless for riders as possible.

**Comment 30 - recommendation regarding Westlake Station:** Seattle Subway recommends the Tunnel 5th Avenue Station (DT-1). However, Seattle Subway recommends Sound Transit study multiple additional design options for the 5th Avenue station. Those additional options should update to the elevator and escalator plan–including but not limited to: adding direct platform to platform connections to improve ease of use and adding additional redundancy–and they should find ways to speed up transfers and surface access.

**Denny Station**

**Comment 31 - request for clarification regarding station depth, and recommendation regarding Denny Station:** Direct bus and streetcar connections, a central location, and proximal access to all of Denny Triangle including Amazon headquarters towers makes

Westlake Avenue Station and its station entrances the best option of the two presented. However, the station is still too deep and overbuilt at 100 feet. The station lies directly under (what should be) a fairly unobstructed street right-of-way. Would Sound Transit please clarify what drives this depth?

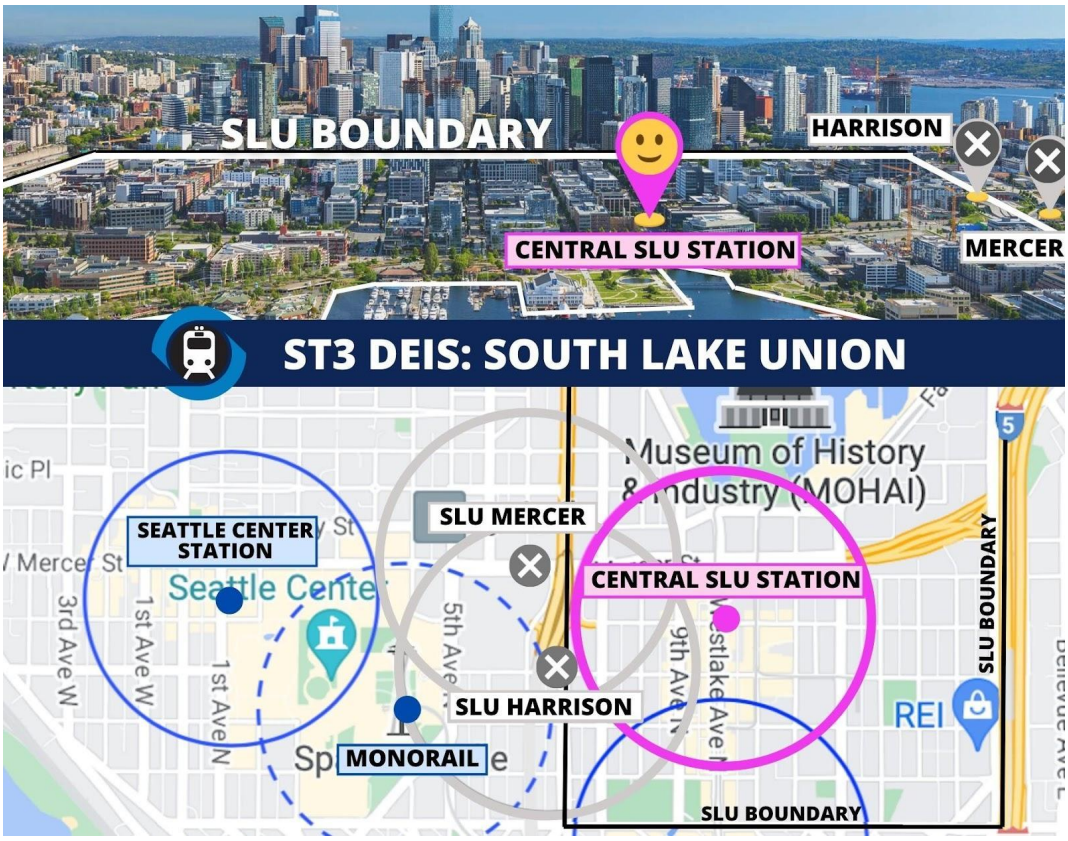
**Comment 32 - recommendation regarding Denny Station:** Tunnel Westlake Ave Station (DT-1) is the clear winner due to the location of its entrances being most proximal to transfers and activity units (including jobs and housing units) in Denny Triangle without crossing Denny Way, but it needs more work to become good. Seattle Subway recommends Sound Transit advance Westlake Station (DT-1) with additional detailed study of an improved vertical conveyance plan, and all possible opportunities to construct at a shallower platform depth.

**Comment 33 - recommendation regarding Terry Station option:** The elevation at the intersection of Fairview and Denny is approximately 120 feet, where Westlake and Denny is approximately 55 feet. Terry Ave N at the station's southern entrance is at approximately 75 feet. Seattle Subway recommends eliminating the Terry Station from consideration as the walkshed of the Cascade neighborhood is still about 55 feet of elevation from having convenient accessibility to the Terry station, and the walkshed of Denny Triangle has poor access from south of Denny Way. Seattle Subway further recommends that if the Terry Avenue Station (DT-2) option is selected, that both an additional station entrance south of Denny Way as close to the transit routes on Westlake Ave and an additional station entrance closer to Denny and Fairview must be constructed.

**South Lake Union Station**

**Comment 34 - a recommendation regarding preferred station location in South Lake Union**: The station location on Mercer Street is outside of neighborhood boundaries and located farther from major transit routes. The Mercer Street station is isolated from the South Lake Union neighborhood by both Mercer Street and SR 99, making it a dangerous and inconvenient location for pedestrians and transit riders. Mercer Street is a wide highway-like road with a high average daily traffic volume. Seattle Subway recommends Sound Transit eliminate the Mercer Street station from consideration for the South Lake Union station location.

**Comment 35- a recommendation regarding preferred station location in South Lake Union & future expansion**: Neither SLU station option serves the neighborhood well and the Mercer Street option isn't even in SLU at all. Failure to locate a SLU station as advertised to voters in 2016 fully within the neighborhood boundaries might even be considered a broken promise to voters by some. Seattle Subway recommends Sound Transit study a better option for this station location that serves the center of SLU and is shallower, and therefore will likely be cheaper and faster to build.




SLU station needs to serve SLU: Pink Dot is Seattle Subway's proposed location for additional study of a South Lake Union Station Location. (https://seattletransitblog.com/2022/04/07/slu-station-can-be-better/).

Keeping the station on Westlake Avenue in the heart of SLU will enable a shallower crossing of SR-99/Aurora Avenue without the negative implications of a station there for rider experience. A north/south station would make building for expandability easier as well. Seattle Subway recommends Sound Transit to find a specific location solution in the vicinity of Westlake Avenue at approximately Republican Street for a station location within SLU boundaries and as centered on the South Lake Union neighborhood as possible.

This location and north/south alignment would allow better future rail fixed guideway system expansion north to the Aurora corridor. Has Sound Transit analyzed how to design the South Lake Union segment and station to accommodate transfers or direct integration of a future rail fixed guideway system expansion to the north along the Aurora Corridor? Seattle Subway recommends considering future rail fixed guideway system expansion along the Aurora High Capacity Transit Corridor identified in the City of Seattle's Transit Master Plan.

**Comment 36 - a recommendation regarding a Harrison Street Station near South Lake Union**: If Sound Transit chooses to advance the South Lake Union Station at Harrison Street, Sound Transit must first prepare a comprehensive study of Harrison Street including how to make the area less hostile to pedestrians and transit riders, and prepare early design options that better connects transit, bicycles, micro mobility, and pedestrians across SR 99 and along the entire Harrison Street corridor from 5th Avenue N to Westlake Avenue N. Otherwise, the

Harrison Street and 7th Ave N station is not acceptable for its projected ridership, 63% of whom are expected to walk to the station.

**Seattle Center/Uptown Station**

**Comment 37 - a recommendation regarding Seattle Center/Uptown Station**: The Seattle Center/Uptown Station must serve the Uptown neighborhood and the millions of patrons of Seattle Center events and activities. Arts stakeholders representing the likes of KEXP, Seattle Rep, Intiman Theater, and Macaw Hall/PNW Ballet have expressed strong opinions against Republican Street station due to long construction impacts and tree removal along August Wilson Way. Seattle Subway recommends Sound Transit select the Republican Street Station alternative and work to mitigate impacts and to reduce and offset impacts to Seattle Center organizations.

**Comment 38 - a recommendation Seattle Center/Uptown Station**: At 110 feet deep, the proposed Mercer station is just too deep. Though the 85 foot deep Republican Street proposal isn't ideal, it's not so deep that properly operating escalators would fail riders like a Mercer station would (https://seattletransitblog.com/2022/03/15/are-st3s-deep-stations-a-problem/) Seattle Subway recommends elimination of the Mercer Street Station option.

**South Interbay, Interbay, and Ballard**

**Comment 39 - a request for clarification and recommendation regarding supplemental DEIS:** Seattle Subway understands there are unsolved constructibility problems and adverse impacts in the DEIS centered on Interbay-Ballard, but including South Interbay as well. If these problems remain unsolved, a supplemental EIS process may be good for the final outcomes of Sound Transit's South Interbay and Interbay-Ballard Segments and may in fact improve rider experience and achieve higher transit ridership over the next 10 to 20 decades, which is absolutely a better outcome. For these specific areas with unsolved problems in South Interbay, Interbay, and Ballard: has Sound Transit considered how to conduct a Supplemental DEIS process that through segmentation and independent utility would allow the rest of the WSBLE project and ST3 projects to continue as scheduled? Seattle Subway recommends considering a supplemental DEIS that through segmentation and independent utility is likely to result in a win-win where there's a better system for generations of riders, increasing Ballard ridership significantly, without delaying the rest of ST3's project list.

**South Interbay**

**Comment 40 - a recommendation regarding improved connections in South Interbay**: Based on the information presented in the DEIS, Sound Transit's Preferred Galer Street Station/Central Interbay (SIB-1) is the best option presented. However, It does not provide a high quality direct connection for the employees at the Expedia Campus. The City of Seattle and Sound Transit have noted the cost and constructability challenges of the proposed stations near West Prospect Street on the east side of Elliott Avenue due to the unstable steep slope of Queen Anne hill causing increased cost for the same projected ridership of 2,600. It offers the most direct pedestrian connection to the Cruise Ship Terminal, Expedia Campus, and Elliot Bay Trail, but we'd like to see pedestrian connections further improved. It also offers a direct location to connect with buses from West Magnolia, and $200 million in savings over the other options. Currently, it lacks the most direct access to Expedia's campus, but building a strategically

placed pedestrian bridge would bring riders to Expedia's true campus front door and the cruise ship terminal in a way the other options never could. Seattle Subway recommends focusing on the preferred Galer Street Station option; however, Seattle Subways recommends refinement of the preferred Galer Street Station alternative (SIB-1) to further improve station access and to minimize safety issues for traffic and pedestrians on Elliott Avenue W.

**Interbay**

**Comment 41 - a request for clarification regarding Interbay bus integration:** With 67% of Interbay station ridership coming from bus transfers and 26% coming from walkers, and with 15th Avenue West at West Dravus Street having 43,000 AAWT: has Sound Transit studied the pedestrian environment for Elevated 15th Avenue Station (both IBB-1b and IBB-3)? If so, what plans to improve pedestrian safety and the environment for IBB-1b and IBB-3, and what budget has Sound Transit included?

**Comment 42 - a recommendation regarding Interbay Preferred Alternative**: Both current Ballard Tunnel station options (IBB-2a/IBB-2b) connect to a retained cut Interbay Station north of West Dravus Street, between 17th Avenue West and Thorndyke Avenue West. This station location, design, and alignment west of 15th Avenue West and to east of the BNSF tracks is preferable to the other options. The other options provide a poor pedestrian environment for riders and reduce the quality of rider's transfer experience from buses. Seattle Subway recommends Sound Transit focus its efforts on this retained cut station location.

**Ballard**

**Comment 43 - a request for clarification regarding Coast Guard Letter:** Elevated 14th Avenue NW Fixed Bridge Alternative (IBB-1a) is now estimated to cost as much as $1.6 billion, bringing it to cost parity with the 14th Avenue NW tunnel alternative and within range of the 15th Avenue NW tunnel alternative. After the DEIS was complete, the United States Coast Guard recently released a letter requiring a 205-foot over water clearance and clarifying horizontal clearance requirements. Will Sound Transit need to complete a supplemental EIS to respond to these requirements? Would Sound Transit please clarify cost estimates for IBB-1a and other bridge alternatives over Salmon Bay in direct response to the Coast Guard letter's requirements?

**Comment 44 - a recommendation for additional study:** From the existing alignment options in Ballard, Sound Transit should retain Elevated 14th Avenue NW Fixed Bridge Alternative as the baseline preferred alternative for cost comparison purposes, and include only the tunnel station on 15th Avenue NW, closer to the central core of the Ballard neighborhood where the highest density of housing, jobs, and activities that maximize ridership are located as an additional preferred alternative option.

**Comment 45 - a recommendation regarding preferred alternative:** Sound Transit should eliminate IBB-1b due to cost and inferior alignment in Interbay, and the unreliable drawbridge option IBB-3 from consideration for the selection of preferred alternative.

**Comment 46 - a recommendation regarding preferred alternative:** The southern entrance to 14th Avenue NW station locations is at the northern end of the Ballard-Interbay Manufacturing and Industrial Center (BIMIC). The Ballard-Interbay Manufacturing Industrial Center is an urban industrial center being prioritized in the Seattle Land Use Code for preservation of land uses

that are not high ridership generators during all hours of the weekday and on weekends, nor excellent for potential commercial or residential TOD. The Port of Seattle's Fisherman's Terminal and other marine and industrial uses in the BIMIC and their associated jobs are unlikely to move or be replaced with higher density uses during the course of the WSBLE construction timeline or during its operation. Recent history can be our guide: the Burke Gilman Trail's arduous history of its "Missing Link" is an example of how challenging (if not impossible) it is to convert industrial land to other uses. Even if an upzone is possible, a 14th and Market station will never serve Historic Ballard Avenue or the dense 24th corridor well. Seattle Subway recommends not proceeding with study of 14th Avenue NW.

**Comment 47 - a recommendation for additional study of 20th Avenue NW in Ballard:** The good news is that Sound Transit studied the 20th tunnel option during Level 3 pre-DEIS work and discovered the obvious: a 20th Avenue station performed significantly better for riders than the other options presented. The bad news is that the station was cut from consideration before the EIS process for planning cost reasons. But an interesting thing has happened since then: the EIS analysis discovere cost parity between elevated and tunnel options in Ballard. An elevated 15th station with a drawbridge (IBB-3) now costs the same as a 14th Avenue NW tunnel (IBB-2a). Would that cost parity extend to a 20th station? It might. As discussed above, the other DEIS options fail to serve Central Ballard and are hemmed in by industrial zoning that is unlikely to change. Ballard doesn't need to rely on Transit Oriented Development to make a station work; it already boasts a desirable, populous urban destination. Ballard's biggest and most productive small business strongholds along 24th and Ballard Avenues aren't moving. This station is the only Ballard station in ST3 and is likely to be the furthest west Ballard station in the system forever. Seattle Subway recommends Sound Transit to conduct a supplemental EIS of 20th Avenue Station/Thorndyke Tunnel Portal alignment in Ballard that through segmentation and independent utility would allow the rest of the WSBLE project and ST3 projects to continue as scheduled, because the difference for thousands of daily riders in Ballard for the next 10 to 20 decades will be significant.

**Comment 48 - a recommendation for additional study of 22nd and 17th Avenues NW in Ballard:** 20th Avenue NW isn't the only station location option in central Ballard that could work. For example, a station on 22nd could offset the continually rising land prices by using a significant amount of City of Seattle-owned land along 22nd Ave (including the Ballard Commons or Bergen Place) as potential locations for Sound Transit station entrances. There could be another central Ballard option that works better than 20th. The point is that Ballard station has to be in central Ballard and the options that made it through the EIS would require an additional future station to serve it properly. Seattle Subway recommends that Sound Transit conduct a supplemental EIS of a station at 22nd Avenue NW and of a station at 17th Avenue NW with an Interbay Thorndyke Tunnel Portal that through segmentation and independent utility would allow the rest of the WSBLE project and ST3 projects to continue as scheduled, because the difference for thousands of daily riders in Ballard for the next 10 to 20 decades will be significant. Seattle Subway also recommends as part of this additional work that Sound Transit engage with the City of Seattle to explore how city-owned land in Ballard could be leveraged for a cost effective station on 22nd Avenue NW.

**Comment 49 - a recommendation regarding future expansion:** A 20th Avenue station is far better for future expansion. Lines continuing to the north and east from Ballard should connect into Ballard Station for one seat rides to downtown Seattle.  An eastward extension should

include an East Ballard station around 8th Avenue NW. Also, if we fail to build a station west of 15th, we'll have to consider building one in the future, which would make the Long Range Plan's Ballard/UW line far less desirable with forced transfers on both sides to access the rest of the system. It's worth noting that a future Ballard to UW extension that isn't interlined would involve another expensive tunnel transfer station at Ballard as well. Seattle Subway recommends planning, design, engineering and construction to accommodate future expansion in Ballard.

**Conclusion**

We appreciate your commitment to delivering the highest possible quality West Seattle Ballard Link Extension project and look forward to reviewing your responses. Thank you for the time and consideration given to these comments.

Sincerely,

Seattle Subway

Cc:
Sound Transit Board of Directors
Peter Rogoff, CEO, Sound Transit
Brooke Belman, Appointed Acting CEO, Sound Transit
Terry White, General Manager, King County Metro
Seattle City Council
Adiam Emery, City of Seattle
Elliot Helmbrecht, City of Seattle
Marshall Foster, City of Seattle
Sara Maxana, City of Seattle
Kristen Simpson, City of Seattle

SIERRA CLUB
WASHINGTON STATE

28 April 2022

WSBLE Draft Environmental Impact Statement Comments
Sound Transit
Seattle, WA 98104

Subject: **Sierra Club Comments on West Seattle and Ballard Link Extension Draft Environmental Impact Statement**

We appreciate the opportunity to comment on a major public transportation project for the central Puget Sound region. The West Seattle and Ballard Link Extensions (WSBLE) will be major assets for the regional mass transit system with reliable connections by clean, electric light rail to dense residential and job centers.

As Sound Transit evaluates the alternatives for stations and alignments in the WSBLE project, the Sierra Club recommends that some major principles be followed in selecting the specific options for routing and station configurations. The selected light rail line should:

- ensure a convenient and user-friendly passenger experience, with easy transfers to other light rail lines and other modes of transit;

- maximize ridership through station siting and ease of access, with careful attention to major activity centers and transit-oriented development potential which lead to more ridership;

- use shallow tunnel stations where underground, and avoid transfers between multiple elevators for transitioning between the surface and station boarding/disembarking platforms;

- design for expandability in the future, considering extensions beyond the terminus stations in the WSBLE project and connections with branching or intersecting additional lines;

- maintain the timeline to deliver the projects by the scheduled completion year if not sooner. Climate impacts and our need to mitigate them through greenhouse gas emission reductions in the next decade demand that this project not be further delayed;

- seek the alternatives that improve cost effectiveness, while avoiding cost escalation on account of challenging and high-uncertainty construction;

- build the system for long-term urban vitality, selecting configurations that deliver a high return on the WSBLE investments while mitigating the impacts from construction to the extent possible. A few years of inconvenience during construction should not detract from a superior finished product that becomes an automatic "go-to" mode of travel.

Comments related to specific station locations and route alignments are provided next according to the selected project segment.

**Delridge/West Seattle Junction**

The Medium Tunnel 41st Ave. SW Station alignment is a good application of shallow tunnel design that supports nearby transit-oriented development (TOD). It aligns well with the Avalon Retained Cut Station, which is easily accessible to users and can be a catalyst for nearby TOD, which should be supported by City of Seattle zoning standards. The Medium Tunnel 41st Ave. Station is well positioned with its north-south alignment for potential extension further south toward White Center.

**SODO**

A low impact and economical configuration is achieved with the SoDo Staggered Station to avoid taking the adjacent Postal Service facility. However, the Mixed Profile Station should continue to be studied if it can also avoid impacting the Postal building since the 5th Ave S. busway can be restored along the corridor following construction. Sound Transit should work with King County Metro to assess the value to local and regional bus transit service of maintaining the 5th Ave S./SODO busway.

**Chinatown-International District**

This location is the major transportation hub for the region. People will transfer between Amtrak, Sounder, multiple Link Light Rail lines, streetcars, buses, and taxis. There must be a convenient and easily navigated pedestrian connection among King Street Station, the current Chinatown-International District (CID) station, and the new Link platforms associated with the WSBLE project. A connecting concourse could be either overhead or underground to provide safe passage across busy 4th Ave S. and the mainline railroad tracks. The user experience should be prioritized by ensuring easy way-finding and secure sightlines, an underground concourse is well lit and sound dampened, and an overhead walkway is weather protected.

We support moving planning forward with the 4th Ave S. Shallow Station and 5th Ave S. Shallow Station alternatives, with particular attention to making the additional CID station as shallow as possible, with good connections to the existing CID station platforms. Sound Transit should pursue a configuration proposed by Seattle Subway that places the WSBLE CID station platforms at a similar depth as the present CID station (https://www.theurbanist.org/2022/04/14/best-seattle-light-rail-alignments/), creating a

quick and easy transfer among lines and modes. This would require the new tunnel to cross over the existing transit tunnel rather than underneath it as it proceeds north under downtown, a design concept well worth pursuing. The connections between lines and modes at CID Station are extremely important to the success of the entire light rail system.

**Downtown**

The Midtown or "Library" Station should be situated at a lesser depth to the extent possible for both ease of use and cost considerations. The shallower 4th Ave S. Station configuration at CID with its tunnel passing over the existing transit tunnel would be compatible with a less deep Midtown station. Transfers between the new tunnel station and existing platforms at Westlake Station should be designed to be as quick and easy to navigate as possible.

A Denny Way Station underneath Westlake Ave is preferable on account of its shallower platforms and ease of connections with the local transit network. The alignment in the South Lake Union area is complicated by the north portal of the SR 99 highway tunnel making both presented station alternatives in this DEIS less than ideal. We suggest Sound Transit explore either shifting the alignment south to Thomas or John Street where it could pass over the SR 99 tunnel resulting in a much shallower South Lake Union Station, or locating the station further east near 8th or 9th Ave N., nearer the center of the SLU neighborhood.

The less deep Seattle Center station at Republican Street with direct one-ride elevators to the surface is preferable for user convenience and proximity to event venues at the Center. Redundancy in the elevator system is important here and elsewhere throughout the system with tunneled stations.

**South Interbay**

The Galer Street Station preferred alternative is more economical than the alternatives and avoids potential construction contingencies from the steep slopes and impacts to the SW Queen Anne Greenbelt. A recent proposal to consolidate the Smith Cove and Interbay Stations into one located by the Armory site has merit on account of the TOD potential surrounding that Armory site. An Armory station location is compatible with either tunnel or high bridge alternatives for crossing the Ship Canal, can provide a convenient transfer point for local buses, and would provide access via trail through the Greenbelt to the western edge of Queen Anne Hill.

**Interbay/ Ballard**

A Ballard Station by NW Market Street needs to have a pedestrian access point on the west side of 15th Ave NW, regardless of whether the station is underground or elevated. This need for access uninhibited by traffic on 15th Ave NW would include an extended tunneled

or elevated concourse from any 14th Ave NW station location. The best alignment for later extension toward Crown Hill should line up with 15th Ave NW, which could be achieved with a diagonal crossover from 14th Ave NW (e.g., NW 56th St. and the parking lot in front of Ballard Market) for an alternative with the Ballard/Market St. station placed on 14th. Sound Transit should work with King County Metro to provide additional bus service to supplement the route 44 between a station along 15th or 14th Ave NW and the western #44 terminus at 32nd Ave NW for high frequency service connecting through the historic core of Ballard.

Regarding the Elevated 14th Ave fixed span bridge, Sound Transit should push back against the Coast Guard assertion that at least 205 feet of vertical clearance is necessary for a span in that location. This assertion to accommodate superyachts, which serve no useful purpose and cause major environmental impacts (https://www.theguardian.com/environment/2022/jan/29/superyacht-sales-surge-prompts-fresh-calls-for-curbs-on-their-emissions), is preposterous and should not be allowed to stand. Even if Sound Transit ultimately selects a tunnel option under the Ship Canal, public policy would be well served by affirming that any Ship Canal bridge crossing east of the existing Ballard Bridge need be no higher above the water than the Aurora Ave N. George Washington Bridge. Design options for a high fixed span bridge should include aesthetic considerations, such as following the design used for the TransLink SkyBridge over the Fraser River in British Columbia (https://buzzer.translink.ca/2021/04/the-skybridge-one-of-the-worlds-longest-transit-only-bridges-photos/).

For this portion of the WSBLE project, the Moveable bridge alternative should be dropped, and further planning concentrate on these alternatives, both with egress points on the west side of 15th Ave NW:

- Tunnel 15th Ave NW Station with Ship Canal tunnel east of the Ballard Bridge;
- Elevated 14th Ave NW Station with fixed span 14th Ave bridge (no higher over the water than Aurora Ave GW Bridge).

**Construction and Capacity in Design**

A major transit project like the WSBLE requires a significant amount of energy use to construct. Sierra Club urges Sound Transit to specify in its design and implementation plans and in proposal bid conditions that electrically powered equipment be used to the extent possible for all construction activities. Where fossil fuel combustion equipment is the only option, cleaner burning fuels such as propane should be used instead of diesel fuel to the extent practical. These practices can reduce both the climate footprint of project construction and minimize the air quality impacts from construction equipment on adjacent neighborhoods and construction workers.

The ability of the WSBLE project elements to accommodate increased ridership in the future, as the region population increases and climate change impacts cause more people to use the transit system, is a crucial consideration in the design for user access. Sound Transit should allow for three-platform design in stations where usage is reasonably expected to increase significantly over time. Efficient flow of system users into and exiting stations can be achieved by separating arriving and departing passengers on different platforms, especially where space constraints make extra wide station platforms difficult to construct. A station with a center platform for all arriving passengers, and two outer platforms for departures going opposite directions can more effectively accommodate large and growing patronage within a constrained station footprint.

**Summary**

The WSBLE project will provide more sustainable transportation options to Seattle and the region at a critical time for reducing the climate footprint from the transport sector. We want to see the user experience at the forefront of the alignment and station configuration selection and design to ensure high ridership and vibrant urban places. Thank you for this opportunity to provide input on the project DEIS, and we look forward to working with Sound Transit to implement a successful WSBLE project.

Sincerely,

Transportation and Land Use Committee
Sierra Club Washington Chapter
Tim Gould, Chair

# The Urbanist

Examining Urban Policy to Improve Cities and Quality of Life
theurbanist.org | info@theurbanist.org


Dear Sound Transit,

It's imperative that we get the alignment and design right for the West Seattle and Ballard Link light rail projects. The Urbanist urges Sound Transit to center transit users in their decision making as success will ultimately be judged by people making use of these multi-billion-dollar investments. Deep stations will discourage riders because they take so long to reach from the surface and elevator queues or outages could render stations useless to many riders. Locating stations where it makes most sense for transit-oriented development, walksheds, and bus connections should also be a high priority.

The areas where Sound Transit's Representative Project most diverge from these principles include Midtown Station and Westlake Station due to their remarkable depth (140 feet and 135 feet respectively). There isn't a preferred alignment at Chinatown-International District, but this too will be a crucial station with some untenable options (such as one that is 200 feet deep) still in the mix. The aforementioned stations will be three of the busiest in the entire light rail system, with CID and Westlake serving as the two primary transfer points between the three different lines. Ensuring these transfers are efficient and accessible will be crucial to the overall usefulness of the network.

As currently planned, many of the stations will require more than one elevator ride to reach the surface, slowing down circulation and negatively impacting disabled riders, in particular, since they have no alternative. Sound Transit should design station platform elevators to provide a straight shot to the surface everywhere feasible.

Here are the general principles The Urbanist advocates for Sound Transit to prioritize in the planning process:

1. **First and foremost, design the system for transit riders and the optimal rider experience.** Traveling between the station platform and the surface should be quick, straightforward, and reliable. Transferring between transit lines should also be quick and easy, especially at the major transfer points at Westlake Station and International District/Chinatown Station.
2. **Build the system to maximize ridership.** Design a good rider experience and ridership should follow. Still, even the most elegant station will struggle for riders if it's in the middle of nowhere, with few homes, jobs, activity centers, or transit connections nearby. Preliminary ridership projections aren't the be-all end-all, but all things being equal, the station alignment projected to get higher ridership does have a leg up.
3. **Design the system to be easy to expand.** Ideally, West Seattle Junction will not be the southern terminus long, as the line extends south to White Center and Burien. Likewise, Ballard should not be the northern terminus long, as the line extends north to Greenwood and perhaps east to Wallingford and the University District. Meanwhile, a future Aurora rail line may link up with the new Downtown

light rail tunnel near South Lake Union Station. Planning with expandability in mind could save billions of dollars and numerous headaches down the road.

4. **Station locations should unlock transit-oriented development (TOD) opportunities to the highest extent possible.** A station isn't just a transit stop, it can be a catalyst for neighborhood development and housing growth, both market-rate and affordable. Sound Transit has an Equitable Transit-Oriented Development (TOD) program that has aided in the construction of hundreds of affordable homes on the agency's surplus properties. Alternatives more favorable to TOD have an edge and they will help the system attract more riders down the road by allowing more people to live in close proximity to light rail.
5. **Construction impacts are important but shouldn't solely determine a 100-year investment.** Construction-related road closures weigh heavy on the mind of policymakers, but it is crucial we pick the right station for the future of Seattle and grapple with the construction impacts that entails. Closing a busy road for a few years is a small price to pay to add a light rail line that will last centuries. The priority in mitigating construction impacts should start with prioritizing pedestrian access, transit operations, and bike routes.
6. **Cost is an important factor, but we shouldn't shy away from big investments where there is a high return.** We are primarily worried about building ST3 right, but we can't dismiss costs, especially since some high-ticket items will require third-party funding, which could be difficult to secure. Controlling costs is also key to avoiding delays to these much-needed lines.

In order to apply these principles, The Urbanist urges Sound Transit to advance the following station alternatives.

**Junction: Medium Tunnel 41st Avenue Station [WSJ-5], but with a study of a refined Elevated Fauntleroy Station that would reduce residential displacement and costly property takings.** Medium Tunnel 41st Avenue Station is the cheapest tunnel option for Junction and relatedly requires the least displacement of homes and businesses. The location on 41st Avenue and Alaska Street puts it pretty squarely in the middle of Junction without too much overlap with Avalon Station. With a station depth of just 50 feet, travel between the station platform and surface should be quick and easy.

**Avalon Retained Cut Station [WSJ-5] with a request to study a refined DEL-6 pairing.** sets up the tunnel to the best underground Junction Station. It's also economical and easy to use since it's just 30 feet under the surface. A retained cut is the method used in the existing International District/Chinatown Station, which is one of Sound Transit's best. It puts the station close to the surface and allows natural light and ventilation in. The Sound Transit Board is also considering a cost-cutting option that would scrap the Avalon Station entirely. But scrapping the station is not a decision that should not be taken lightly. Avalon Way SW has seen considerable housing growth and the Sound Transit 3 ballot measure did promise Avalon a light rail station. Plus, 5,400 people are expected to reside in the 10-minute station walkshed and that's a lot of people to abandon.

**Delridge: Request a study of improved DEL-6 options that are compatible with the Medium 41st Avenue Tunnel [WSJ-5].** The Elevated Andover Station Lower Height Alternative [DEL-6] came among the most affordable Delridge stations and it is the only one that pairs with the retained cut station in Avalon. Delridge will primarily be a bus transfer station since it's located in an industrial area sandwiched against the West Seattle Freeway. RapidRide H will run down Delridge Way SW and ferry many riders to their ultimate destination. Putting the station so far north and close to the freeway isn't ideal, and we encourage Sound Transit to look at options to open up a better walkshed and more TOD opportunities while still pairing with the retained cut Avalon Station. Still, since bus transfers will be the primary source of riders, the location could be workable.

**SoDo: Choose Mixed Profile Station [SoDo-2] and study site further north at the existing SoDo Station location to avoid costly post office taking.** One of the biggest tradeoffs to consider with SoDo Station is the preferred alternative, which is at-grade, would require the loss of SoDo busway. The elevated "mixed-profile" station allows the busway to reopen after about 10 years of construction. Losing the SoDo busway could cost King County Metro thousands of annual bus service hours since it provides a quick mainline to route buses to and from its Atlantic Bus Base. The downside of the Mixed Profile Station is that it costs more, at an estimated $800 million. The preferred "staggered" alternative would cost as little as $500 million or as much as about $700 million, if it turns out the option still requires the taking of a very large US Postal Service facility, which appears to be responsible for the better part of that $200 million hit to the budget. If the Mixed Profile Station can avoid that same post office taking, then it could save a similar amount. The pedestrian overpass of 5th Avenue S appears unnecessary, so that use of the post office property appears a low value add.

**CID: Prefer 4th Avenue Shallow Alternative (CID-1a) alignment but please make it shallower. Study making it as shallow as the existing CID station by using a shallow tunnel over the existing Downtown Seattle Transit Tunnel to reach Midtown. The transfers must be quicker than four and a half minutes.** Chinatown-International District (CID) will be one of the busiest stations and offers transfers between three light rail lines, plus Sounder commuter rail, Amtrak, and the Seattle Streetcar. It will be arguably the most important transit hub in the entire system. Sound Transit has yet to identify a preferred alternative here, but the deep options clearly have huge drawbacks, including cost, slower transfers, and also forcing the Midtown Station to be even deeper too, worsening the quality of the station there, as well. Collectively, about 32,000 daily riders are projected at the two CID stations, underscoring its importance.

**Midtown**: **Make the station as shallow as possible, design the station for surface to platform elevators, build in ample elevator redundancy, and use modern interfaces to ensure nearly seamless elevator use.** As it stands, Midtown Station is about 140 feet deep in the agency's preferred alternative. The initial plan also calls for a fairly long walk on a mezzanine level to reach the elevators to the surface either at the north entrance (opposite Seattle Central Library) or the south entrance at 5th and Columbia Street. The 5th Avenue Station is the superior option of the two presented, but making the station shallower would improve access and shave time to surface. Sound Transit has modeled

travel times from the surface to the station platform at five to six minutes via escalator at Midtown Station and two to three minutes via elevator, barring congestion issues due to high passenger loads. No escalators are planned at the deeper 6th Avenue station, removing a valuable redundancy for passengers.

**Westlake: 5th Avenue Station [DT-1]. Update the elevator and escalator plan to improve ease of use and redundancy and find ways to speed up transfers and surface access.** Station depth is an issue at Westlake Station, and the transfers are a big question mark. The 5th Avenue option again has the edge, but making the transfer environment high quality will be key. Westlake Station is projected to lead the entire system with a combined 73,900 daily riders, 31% of them transferring between the lines. At such a busy station, the transfers and passenger flow must be good, and early designs leave much to be desired. Sound Transit estimates the time to surface at four to six minutes via escalator for the new Westlake Station, and the elevator time would be three to five minutes. The transfer to the existing station nearly 100 feet up, meanwhile, will take three minutes to the closer northbound side and four minutes to the far southbound side of the platform. Again these times are for able-bodied riders, as the agency has yet to dig into how the station designs will affect disabled riders. If the agency is able to decrease the distance and travel time between the two stations, it certainly should.

**Denny**: **Westlake Avenue Station [DT-1]. Update vertical conveyances and aim shallower.** Both Denny Station alternatives are pretty solid, but the preferred alternative Denny is shallower (100 feet versus 125 feet) and offers more seamless transit connections. The catch is that putting the station underneath Westlake Avenue would disrupt streetcar and bus operations on the street above during construction, but thoughtful planning should be able to mitigate the disruptions. For example, station pick decking may allow buses to continue to run overhead during construction. We're also excited by the idea of putting a station entrance on a pedestrianized Lenora Street, which would not only save money, but also improve station access.

**SLU: Prefer Harrison Street as the less bad option included, but study a Westlake Avenue or similar alignment centered in South Lake Union as much as possible.** In a previous article, we noted that the SR 99 highway tunnel is hamstringing the options at South Lake Union Station. In the preferred alternative, the light rail tunnel must pass underneath the SR 99 tunnel portal, which forces it to be deep — about 120 feet deep to be exact. But in the Mercer alternative, the redesigned SR 99 provides no good places for a bus transfer point for the busy Aurora Avenue artery. Of the two options currently on the menu, the preferred Harrison Street alternative is the less bad option. However, Seattle Subway is campaigning to add a station alternative closer to the heart of South Lake Union. They recommend putting the station near the intersection of Republican Street and Westlake Avenue, a quarter mile east of the existing proposals. The Urbanist agrees this option should be studied to confirm the expected advantages it'd have over a station straddling SR 99 and surrendering a good chunk of its walkshed to a gaping highway trench.

**Seattle Center: Prefer Republican Street Station and work to mitigate impacts to arts organizations to the extent possible.** From a rider perspective, the Republican Street station is clearly superior. Estimated to be 85 feet deep, the station also boasts elevators headed directly to the surface, forgoing the elaborate mezzanine interchanges that may confound and delay riders elsewhere downtown. Mercer is significantly deeper at about 110 feet deep, wouldn't have elevators direct to the surface as currently planned, and it's also farther from Climate Pledge Arena and the rest of the Seattle Center complex. Simply put, it's just far less convenient.

**Smith Cove: Preferred Galer Street Station [SIB-1].** Sound Transit's preferred alternative is the elevated Galer Street Station, and we tend to agree. The main advantage is cost, with the option coming in about $200 million cheaper than other options. But the location also offers good connections to South Magnolia, the Elliott Bay Trail, and Expedia Campus. The more southern alternatives would offer better walking connections up to West Queen Anne via Kinnear Park or trails through the SW Queen Anne Green Belt, and they're closer to the surface in either the retained cut or the 35-foot elevated option. However, the southern station locations also require plowing through some of the greenbelt and putting up a big retaining wall. Overall, this doesn't appear to be worth the added cost and tradeoffs.

**Interbay: Advance and refine Thorndyke Retained Cut [IBB-2a/IBB-2b] and a slimmed down 15th Avenue Elevated Station [IBB-3].** Interbay Station sets up the crossing of Salmon Bay. It is also projected to attract 4,200 daily riders, with two-thirds expected to be arriving via bus. Seattle Subway prefers the Thorndyke retained cut option because it pairs with the 20th Avenue Ballard Station they wanted added back into contention, as well as the other tunnel stations for Ballard. Meanwhile, The Urbanist has presented a case for moving the existing Ballard Bridge east and running elevated light rail along 15th Avenue NW to tame that dangerous high-speed street. This would pair with the elevated 15th Avenue alternative for Interbay, which Sound Transit presented as an overbuilt triple-decker station above the highway trench. But with a slimmer highway, a slimmer and cheaper station would be possible, an urbanist win-win. The preferred alternative of an elevated 17th Avenue station appears the weakest of the bunch, but it could work if an elevated crossing ends up winning out and 15th Avenue proves too fraught or costly. The 15th Avenue Station has the most overall TOD potential as it grabs more of the walkshed east of the 15th trench, which it sits astride. Siting the station on 17th Avenue flush up against Balmer Railyard limits that walkshed and TOD area.

**Ballard: Ask Sound Transit to study pairing a high bridge with an elevated 15th Avenue Station and to continue to refine all tunnel options to put a station entrance west of 15th Avenue. Open additional study of 20th Avenue Station/Thorndyke Tunnel Portal alignment.** As with Junction, Ballard has a tunnel station that is surprisingly cost competitive with the elevated options in the Draft EIS. The 14th Avenue Tunnel Station is among the cheapest alternatives, and unlike the preferred alternative, it doesn't include a moveable bridge, which would come with reliability issues. On the other hand, 14th Avenue is farther from the historic core of Ballard, and the busy 15th Avenue NW is a significant impediment to people walking, rolling, or biking to the station and can slow Route 44 buses as well. Tunnel 15th Avenue Station is projected to cost $200 million more

than Tunnel 14th Avenue Station, but placing a station entrance west of 15th Avenue would be worth the added expense. Sound Transit and the City of Seattle should do everything they can to make it happen. The agency has said it will require third party funding for options that are significantly more expensive than the preferred alternative. A tunnel station at 20th Avenue NW is likely to be pricier still, but Seattle Study is urging a study to confirm that assumption — which had gotten the option eliminated earlier in the process. This would be wise given how much the earlier estimates were off.

**More transparency please**. Finally, we must lodge our frustration that Sound Transit has not shown more of its work. The point of an Environmental Impact Statement (EIS) is for an agency to pause and show its work. WAC 197-11-400 states "The EIS process enables government agencies and interested citizens to review and comment on proposed government actions, including government approval of private projects and their environmental effects. This process is intended to assist the agencies and applicants to improve their plans and decisions, and to encourage the resolution of potential concerns or problems prior to issuing a final statement. An environmental impact statement is more than a disclosure document. It shall be used by agency officials in conjunction with other relevant materials and considerations to plan actions and make decisions."

Sound Transit's lengthy tome doesn't include relevant details as outlined above, such as how passengers will move through the terminals/stations or what alternatives were considered to the superdeep alignments. This organization and others have struggled to get the agency to follow up on reasonable questions. As a result, some potential impacts of the agency decisions before us aren't yet known even though they should be. We look forward to a complete DEIS that addresses these questions and fulfills the requirements and intent of Washington's State Environmental Policy Act.

Sincerely,

Doug Trumm
Executive Director
The Urbanist

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| **#504869**<br><br>**Date Recieved:**<br>4/27/2022<br><br>**Created by:**<br>Christopher Johnstone<br>**Audience**:<br>General Public<br>**Reach**:<br>**Participation**:<br>**Engagement**:<br>**Source**:<br>Email<br>**Assigned division**:<br>Outreach<br>**Category**:<br>**Project Phase**:<br>Planning<br>**Project Segment**:<br>**Environmental phase**:<br>Draft EIS | Date: April 28, 2022<br><br>To: Sound Transit Board and leadership<br><br>From: Transportation Choices Coalition, Housing Development Consortium of Seattle-King County, Cascade Bicycle Club, Washington Environmental Council<br><br>Re: WSBLE DEIS<br><br>Dear Sound Transit Board and leadership,<br><br>Thank you for the opportunity to comment on the West-Seattle & Ballard Link Extension Draft Environmental Impact Statement. Our organizations are part of a regional group, Transit Access Stakeholders, which is a growing coalition of organizations that strongly supports connecting the Puget Sound region through affordable, reliable, equitable, accessible, and sustainable transit. Together, we represent active transportation, mobility justice, affordable housing, transit, and climate protection stakeholders, with thousands of members in the central Puget Sound region.<br><br>Throughout the planning process, several groups in our coalition have weighed in on our collective values for Sound Transit 3. These values include:<br><br>Maximize equitable TOD and affordable housing potential<br>Carefully integrate critical transit, bike, and walking networks<br>Prioritize race and social justice<br>Ensure travel reliability<br>Minimize and fight displacement<br>Accessibility for all users, especially those with disabilities<br>Build a system that looks to the future by designing for resilience and expansion, reducing air and climate pollution, and considering future land use<br><br>We urge you to continue to hold these values and goals when evaluating and making alignment decisions. Having a rider-centered system that helps achieve environmental, safety, and equity goals is critical and digesting the DEIS information through this lens is the best way to do so.<br><br>WSBLE will bring unprecedented reliable high capacity transit to hundreds of thousands of people in the Puget Sound region, and we are excited to help support its development.<br><br>Given our values, the data and information made available through the analysis, and conversations with our trusted partners and impacted stakeholders, we offer the following additional comments on the WSBLE DEIS.<br><br>---<br><br>Deliver a world class transit system and do not make short-sighted cost-cutting decisions. As you consider alignments and stations, please remember that these critical pieces of mobility and community infrastructure will last multiple lifetimes. In the name of cost saving, please do not limit long-term potential and sacrifice any voter-approved stations. Equally important, we urge you to not make short-sighted money-saving alignment decisions that will have a negative impact on user safety; that undermine walk, bike, and local transit access; or that forfeit equitable TOD opportunities. Such budget cuts may create short-term financial savings, but represent huge costs to mobility, safety, accessibility, and the environment, while investing in vibrant, thoughtfully located, well-integrated stations has benefits that will last for generations.<br><br>Plan for seamless, safe, and sustainable transit access and integration. We urge Sound Transit to use System Access Funds, develop strong partnerships, and proactively plan to ensure active transportation access and local transit integration to and within the line. With that in mind, in the next phase of planning, please study the following areas:<br><br>Active transportation integration for all stations. Create a plan to identify and fund simple, safe, protected, bike and walk connections to new stations. Partner with the city to do this work – don't just rely on the city to do it. New station areas must improve the current biking and walking conditions, not degrade them. That's only going to be possible by studying how the active transportation system will interact with the station area and the many transportation modes arriving at the station to ensure walking, biking, and transit facilities are meaningfully upgraded with physical separation from cars.<br><br>Construction impacts to the existing active transportation networks and transit routes, and mitigation plans. Taking the next step in evaluating construction impacts to active transportation networks and transit routes now means that alternate routes can be advanced in design and construction ahead of the closure of these, and other, key routes. Partner with the city to do this early to avoid detours that add an unreasonable distance, feel unsafe, or involve people biking on sidewalks for long distances without consideration of how bikes and pedestrians can co-exist safely.<br>Bike parking needs for the entire line. Develop a plan that reflects current and future needs, by station type, and is informed by how people integrate the bike into their regional transit trips. Partner with the city to identify opportunities for collaboration to support shared bike parking accommodation needs, and the broader goal of removing barriers to more people biking – one perineal barrier being a lack of secure covered bike parking. At the same time, accept and embrace that people will continue to bring bikes on trains – and make it work for everyone. Necessity, not preference, typically dictates whether people will bring their bike aboard, and we need to build system capacity to reflect this reality.<br><br>Revisit 3rd party funding considerations. Given the current volatility of cost projections, we urge you to decide on the best project, focusing on the outcomes we want and then determining how we can select the best feasible alignments to achieve these - those with the highest benefit and least negative impacts - before determining what "baseline" costs are or identifying where additional 3rd party funding is needed.<br><br>Chinatown/ID station. Chinatown, Japantown, and Little Saigon are all historic neighborhoods as well as current day thriving cultural community hubs that have endured ongoing harms from government. There remain deep concerns from community members about the impacts - cultural, economic, social, mobility - of all alternatives presented in the DEIS. Feedback from the community suggests that local in-language engagement has been limited, and that many residents and business owners have not been adequately informed of what's coming or their rights to respond. While this is a critical connection in the larger LINK system, there does not seem to be consensus on the vision for the station for the community. Neighborhood stability and prevention of displacement of this community of color is a goal in and of itself. Considering the long term construction and displacement impacts of any of the alternatives, Sound Transit must be ready to avoid, minimize and mitigate impacts to the greatest extent possible, and must be willing to present specific mitigation measures as well as demonstrate how they can deliver on such promises in order to allow community members to weigh in with full information, while ensuring an excellent transfer and access experience for all riders.<br><br>In addition to prioritizing further exploration of options beyond the proposed alternatives, the Wing Luke Museum and other community organizations are calling for an additional study done by external consultants, working with community partners. They want to address the numerous requests for additional information or |

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| | exploration, whether related to historic and archaeological resources or the multiple fronts of construction impacts. The current DEIS is inadequate and does not fully recognize the racist cumulative impact of past public infrastructure projects on the C/ID, and it is "inherently faulty because it fails to take into account the existing present-day conditions of high displacement within the CID." (1)<br><br>Strive for voter-approved timelines. We must move at the speed of trust with impacted communities in the planning, information, and decision-making processes, ensuring the voices of impacted communities are engaged, heard, and impact the outcome. We must also work to deliver the benefits of light rail as soon as possible. People from all corners of Puget Sound have waited too long for regional high capacity transit, and we must maintain a north star of the originally promised delivery dates. Substantially pushing out already extended timelines for link extensions threatens our regional mobility, access to opportunity, and impact on climate change.<br><br>Thank you,<br><br>Transportation Choices Coalition<br><br>Housing Development Consortium of Seattle-King County<br><br>Cascade Bicycle Club<br><br>Washington Environmental Council<br><br>(1): https://www.wingluke.org/wp-content/uploads/2022/04/Wing-Luke-Museum_response-to-WSBLE-DEIS_2022-04-26.pdf<br><br>Hester Serebrin (she/her)<br><br>Policy Director<br><br>---<br><br>Transportation Choices<br><br>1402 3rd Ave #310<br><br>Seattle, WA 98101<br><br>Phone: 206.329.2336<br><br>www.transportationchoices.org<br><br>Stay up to date with our work. Sign up for our newsletter here. |

WASHINGTON TRUST FOR HISTORIC PRESERVATION

April 28, 2022

WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104 [sent via electronic mail]

Re: Comments on the DEIS for West Seattle and Ballard Link Extensions Project

Dear Lauren Swift,

On behalf of the Washington Trust for Historic Preservation, I am writing to provide comments on the Draft Environmental Impact Statement (DEIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, notice of which was issued on January 28, 2022.

The Washington Trust is a nonprofit organization dedicated to saving the places that matter in Washington State and the only statewide advocacy organization working to build a collective ethic that preserves historic places through education, collaboration, and stewardship. In accordance with our mission, the Washington Trust takes great pride in the opportunity amplify the voices of those who inhabit, visit, care for, and cherish what the City of Seattle calls the Chinatown-International District and is listed on the National Register of Historic Places as Seattle Chinatown Historic District, as it relates to the WSBLE Project.

The Washington Trust **opposes all three 5th Avenue Alignments as proposed**: CID-2a (Shallow Station), CID-2a diagonal (Shallow Diagonal Station), and CID-2b (Deep Station) for the following reasons:

- All three options yield a minimum displacement of 18 to 28 local businesses, 170-230 predominantly Asian/Asian-American/immigrant employees (excluding hundreds non-immediately adjacent businesses within the district.
- All three options' construction zones produce quality-of-life disruptions as it relates to noise population, air quality, road closures and traffic detours that impede social and recreational activities for hundreds of residents and thousands of visitors, of which include 1,200 Asian elders who rely on and convene at Hing Hay Park, immediately adjacent to the construction zone and the proposed ventilation structure.
- All the three options require the demolition of at least two buildings that are eligible or listed on the National Register of Historic Places: currently used as Joe's Bar and Grill, the 1926 brick masonry storefront building (contributing) , and Seattle First National Bank (currently Bank of

America), the 1958 brick and glass curtain wall building featuring midcentury "Multi-colored Oriental motif abstract grillwork". 5th Avenue options also require the protection of the iconic Chinatown Gate (archway), which has been proposed to be temporarily wrapped with a scaffolding-like system. The action plan and impact of these historic structures have been completely remised in the DEIS.

The Washington Trust **recommends further consideration and fair analysis of 4th Avenue Alignment** options for the primary reason:

- 4th Avenue Alignments is an edge condition defining the boundaries of the Seattle Chinatown Historic District and features no retail businesses on either sides of the street, nor any residential structures, *with the exception of the 120 units in the mid-rise structure with a first floor Bartell's drug and convenient store, both of which require entry at the corner of 4th and Jackson,* at the northmost end of the identified construction zone. While substantially fewer businesses are impacted by 4th Avenue as opposed to 5th Ave options, we acknowledge the 120 residential units that will be subject to displacement, reported in Sound Transit publications. We encourage Sound Transit in partnership with the City of Seattle to provide displaced individuals with relocation assistance including monetary support as well as the option of first return after construction allows. We also call for a more detailed study on displacement and adverse effects on the quality of life for non-immediately adjacent community members impacted by 5th Ave options, as we believe "120 vs. 0" displacement between the two options is a characteristically false conclusion.

Thank you for the opportunity to provide comments and respond to the DEIS. From these *draft* documents, that Washington Trust concludes that 5th Avenue Alignment options will clearly and irreversibly damage the fabric and livelihood in the heart of the Chinatown-International District, whereas there is not sufficient information at this time to fully support a 4th Avenue Align option. Overall, we encourage and look forward to more thoughtful engagement with community members within the district, alongside the City of Seattle and King County, as Sound Transit move forward toward the *final* Environmental Impact Statement. The Chinatown-International District is a local, national, international, historic and cultural treasure with immense multi-generational presence; all parties involved must proceed with the utmost sensitivity and benevolence for its continued prosperity.

Sincerely,

Huy Pham

Huy Pham
Preservation Programs Director