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## Index

Date	Format	From	То	Description
February 2-5, 2018	Letter	FTA	Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation	Initiation of government-to- government consultation
February 6, 2018	Letter	Sound Transit	Duwamish, Snohomish	Invitation to participate in SEPA early scoping
February 8, 2018	Email	Snoqualmie Indian Tribe	FTA	Letter indicating cultural resources concern are requesting cultural resources survey
February 12, 2018	Email	Sound Transit	Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation	Invitation to participate in SEPA early scoping
February 14, 2019	Letter	Sound Transit	Duwamish Tribe, Snohomish Tribe	Scoping notification and invitation to participate in the environmental review process
February 15, 2019	Email	Sound Transit	Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation, the State Historic Preservation Officer	Transmittal of SEPA Determination of Significance and scoping meeting invitation
February 25, 2019	Letter	FTA	Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation, the State Historic Preservation Officer	Section 106 initiation and invitation to participate in environmental review process

Date	Format	From	То	Description
March 5, 2019	Email/ Form	The State Historic Preservation Officer	FTA	Participating agency acceptance letter
May 10, 2019	Letter	FTA	Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation, the State Historic Preservation Officer	Transmittal of Agency Coordination Plan and request for concurrence with proposed schedule
May 10, 2019	Email	Sound Transit	Duwamish Tribe, Snohomish Tribe	Transmittal of Agency Coordination Plan and request for concurrence with proposed schedule
May 21, 2019	Letter	The State Historic Preservation Officer	FTA	Concurrence with schedule proposed in the Agency Coordination Plan
July 23, 2019	Letter	FTA	Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation, the State Historic Preservation Officer	Request for concurrence with area of potential effects and No Adverse Effects determination for geotechnical investigation
July 24, 2019	Email	Sound Transit	Duwamish Tribe, Snohomish Tribe	Request for concurrence with area of potential effects and No Adverse Effects determination for geotechnical investigation
August 9, 2019	Letter	The State Historic Preservation Officer	FTA	Area of potential effects and No Adverse Effects determination concurrence for geotechnical investigation
September 9, 2019	Letter	Sound Transit	Duwamish Tribe, Snohomish Tribe, the State Historic Preservation Officer	Request for Environmental Impact Statement methodology review
September 10, 2019	Letter	FTA	Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation	Request for Environmental Impact Statement methodology review

Date	Format	From	То	Description
September 26, 2019	Letter	The State Historic Preservation Officer	Sound Transit	Environmental Impact Statement methodology comment letter
February 12, 2020	Letter	FTA	Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation, the State Historic Preservation Officer	Request for comments on area of potential effects and Archaeological Survey and Inventory Plan
February 20, 2020	Letter	Sound Transit	Duwamish Tribe, Snohomish Tribe	Request for comments on area of potential effects and Archaeological Survey and Inventory Plan
February 25, 2020	Letter	The State Historic Preservation Officer	FTA	Area of potential effects concurrence and archaeological inventory methodology comments
April 21, 2020	Email	FTA	The State Historic Preservation Officer	Transmittal on the Built Environment Inventory Plan
April 23, 2020	Email	The State Historic Preservation Officer	FTA	Concurrence with Built Environment Inventory Plan
August 31, 2020	Letter	FTA	Freeway Park Association, City of Seattle Historic Preservation Office, Martin Smith Inc., Alliance for Pioneer Square King County Historic Preservation Program, Historic Seattle, Historic South Downtown Community Preservation and Development Authority, Washington Trust for Historic Preservation, Seattle Center, Seattle Chinatown International District Preservation and Development Authority,	Section 106 consulting party invitation
September 14, 2020	Email	City Historic Preservation Officer	FTA	Consulting party acceptance letter and FTA response
September 23, 2020	Email	Historic Seattle	FTA	Consulting party acceptance letter
September 24, 2020	Email	Washington Trust for Historic Preservation	FTA	Consulting party acceptance letter
September 29, 2020	Email	Alliance for Pioneer Square	FTA	Consulting party acceptance letter and comment on APE

Date	Format	From	То	Description
September 29, 2020	Email	Seattle Chinatown International District Preservation & Development Authority	FTA	Consulting party acceptance letter and comment on APE
September 29, 2020	Letter	Historic South Downtown Community Preservation and Development Authority	FTA	Consulting party acceptance letter and comment on APE
September 30, 2020	Email	Martin Smith Inc.	FTA	Consulting party acceptance letter and comment on APE
December 7, 2020	Letter	FTA	Southwest Seattle Historical Society, InterIm Community Development Association	Section 106 consulting party invitation
December 21, 2020	Letter	InterIm Community Development Association	FTA	Consulting party acceptance letter and comment on area of potential effects
December 29, 2020	Email	Southwest Seattle Historical Society	FTA	Consulting party acceptance letter
March 22, 2021	Email	FTA	City Historic Preservation Officer, Historic Seattle, Historic South Downtown Community Preservation and Development Authority, InterIm Community Development Association, King County Historic Preservation Program, Martin Smith Inc., Alliance for Pioneer Square, Seattle Chinatown International District Preservation & Development Authority, Southwest Seattle Historical Society, Washington Trust for Historic Preservation	N.H.P.A. Section 106 Consulting Party Kickoff Meeting Notice and Coordination Plan
March 22, 2021	Email	FTA	The State Historic Preservation Officer, Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation	N.H.P.A. Section 106 Consulting Party Kickoff Meeting Notice and Coordination Plan

Date	Format	From	То	Description
March 25, 2021	Letter	FTA	Historic Seattle, Alliance for Pioneer Square, City Historic Preservation Officer, Historic South Downtown Community Preservation and Development Authority, InterIm Community Development Association, King County Historic Preservation Program, Martin Smith, Inc., Seattle Chinatown International District Preservation & Development Authority, Southwest Seattle Historical Society, Washington Trust for Historic Preservation, The State Historic Preservation Officer	N.H.P.A. Section 106 Area of Potential Effects Amendment
March 25, 2021	Letter	FTA	Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation	N.H.P.A. Section 106 Area of Potential Effects Amendment; and National Environmental Policy Act, Administrative Draft Environmental Impact Statement
March 26, 2021	Letter	The State Historic Preservation Officer	FTA	Area of potential effects concurrence
March 30, 2021	Letter	Sound Transit	Duwamish Tribe, Snohomish Tribe	N.H.P.A. Section 106 Area of Potential Effects, Cultural Resources Technical Report, Agency and Tribal Coordination plan, and National Environmental Policy Act, Administrative Draft Environmental Impact Statement Methodologies
April 30, 2021	Letter	InterIm Community Development Association	FTA	Section 106 Consultation Comments
September 3, 2021	Letter	FTA	Historic Seattle, Alliance for Pioneer Square, City Historic Preservation Officer, Historic South Downtown Community Preservation and Development Authority, InterIm Community Development Association, King County Historic Preservation Program, Martin Smith, Inc., Seattle Chinatown International District Preservation & Development Authority, Southwest Seattle Historical Society, Washington Trust for Historic Preservation	N.H.P.A Section 106 Area of Potential Effects Amendment and N.R.H.P Eligibility Determinations

Date	Format	From	То	Description
September 3, 2021	Letter	FTA	The State Historic Preservation Officer, Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation	N.H.P.A. Section 106 Area of Potential Effects Amendment and N.R.H.P. Eligibility Determinations
September 20, 2021	Letter	Sound Transit	Duwamish Tribe	N.H.P.A. Section 106 Area of Potential Effects Amendment and N.R.H.P. Eligibility Determinations
September 27, 2021	Email	Duwamish Tribe	Sound Transit	Re: APE Amendments and N.R.H.P Eligibility Determinations
October 5, 2021	Letter	The State Historic Preservation Officer	FTA	Re: Revised APE Comments
October 6, 2021	Email	City Historic Preservation Officer	FTA	Re: N.H.P.A. Section 106 Area of Potential Effects Amendment and N.R.H.P. Eligibility Determinations
October 6, 2021	Letter	Alliance for Pioneer Square	FTA	Re: N.H.P.A. Section 106 Area of Potential Effects Amendment and N.R.H.P. Eligibility Determinations
October 6, 2021	Letter	Historic South Downtown Community Preservation and Development Authority	FTA	Re: N.H.P.A. Section 106 Area of Potential Effects Amendment and N.R.H.P. Eligibility Determinations
October 7, 2021	Letter	Martin Smith, Inc.	FTA	Re: N.H.P.A. Section 106 Area of Potential Effects Amendment and N.R.H.P. Eligibility Determinations
November 9, 2021	Letter	The State Historic Preservation Officer	FTA	Built Environment Determinations of Eligibility
Various dates	Letter	Alliance for Pioneer Square	Sound Transit	Comments on WSBLE Draft Environmental Impact Statement
April 25, 2022	Letter	Seattle Chinatown International District Preservation & Development Authority	Sound Transit	Comments on WSBLE Draft Environmental Impact Statement
April 26, 2022	Letter	Wing Luke Museum	Sound Transit	Comments on WSBLE Draft Environmental Impact Statement

Date	Format	From	То	Description
April 26, 2022	Letter	Historic South Downtown Community Preservation and Development Authority	Sound Transit	Comments on WSBLE Draft Environmental Impact Statement
April 27, 2022	Letter	Martin Smith, Inc.	Sound Transit	Comments on WSBLE Draft Environmental Impact Statement
April 27, 2022	Email	The State Historic Preservation Officer	FTA	Comments on WSBLE Draft Environmental Impact Statement
April 28, 2022	Letter	Historic Seattle	Sound Transit	Comments on WSBLE Draft Environmental Impact Statement
April 28, 2022	Letter	Washington Trust for Historic Preservation	Sound Transit	Comments on WSBLE Draft Environmental Impact Statement
April 28, 2022	Letter	City of Seattle	Sound Transit	Comments on WSBLE Draft Environmental Impact Statement
April 13, 2023	Email	Historic Seattle	Sound Transit	Update on Section 106 process following Draft Environmental Impact Statement publication
April 26, 2023	Email	FTA	Historic Seattle	Update on Section 106 process following Draft Environmental Impact Statement publication
July 10, 2023	Letter	Sound Transit	State Historic Preservation Officer, Muckleshoot Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation, Duwamish Tribe, Snohomish Tribe	Announce decision to separate the environmental review processes for the two Link extensions

Date	Format	From	То	Description
July 10, 2023	Letter	Sound Transit	Historic Seattle, Alliance for Pioneer Square, City Historic Preservation Officer, Historic South Downtown Community Preservation and Development Authority, InterIm CDA, King County Historic Preservation Program, Martin Smith Inc., Seattle Chinatown International District Preservation & Development Authority, Southwest Seattle Historical Society, Washington Trust for Historic Preservation, Seattle Center	Announce decision to separate the environmental review processes for the two Link extensions
August 2, 2023	Letter	FTA	The State Historic Preservation Officer, Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation	N.H.P.A. Section 106 Area of Potential Effects amendment, removing the Ballard Link Extension
August 2, 2023	Letter	FTA	Historic Seattle, Alliance for Pioneer Square, City Historic Preservation Officer, Historic South Downtown Community Preservation and Development Authority, InterIm CDA, King County Historic Preservation Program, Martin Smith Inc., Seattle Center Redevelopment Office, Seattle Chinatown International District Preservation & Development Authority, Southwest Seattle Historical Society, Washington Trust for Historic Preservation	N.H.P.A. Section 106 Area of Potential Effects amendment, removing the Ballard Link Extension and invitation to confirm interest in Section 106 consultation for the West Seattle Link Extension Project.
August 14, 2023	Letter	The State Historic Preservation Officer	FTA	Concurrence on revised area of potential effects.
August 21 and 31, 2023	Email	City Historic Preservation Officer	FTA	Indicated interest in remaining a Consulting Party, and no comment on area of potential effects.
September 5- 13, 2023	Letter	Sound Transit	Duwamish Tribal Organization, Snohomish Tribe	Request for comments on area of potential effects
September 5, 2023	Email	Suquamish Indian Tribe of the Port Madison Reservation	FTA	Concurrence on area of potential effects
September 11, 2023	Email	Alliance for Pioneer Square	FTA	Indicated interest in remaining a Consulting Party

Date	Format	From	То	Description
September 19, 2023	Email	FTA	Washington Trust for Historic Preservation, Seattle Center Redevelopment Office, Southwest Seattle Historical Society, King County Historic Preservation Program, Martin Smith Inc., Seattle Chinatown International District Preservation & Development Authority, Historic South Downtown Community Preservation and Development Authority, InterIm CDA, Historic Seattle	Requested interest in remaining a Consulting Party for WSLE
September 19, 2023	Email	Seattle Center	FTA	No longer interested in remaining a Consulting Party for WSLE
October 10, 2023	Email	Washington Trust for Historic Preservation	FTA	Indicated interest in remaining a Consulting Party
March 18, 2024	Letter	FTA	City Historic Preservation Officer, Alliance for Pioneer Square, Washington Trust for Historic Preservation, Suquamish Indian Tribe of the Port Madison Reservation, Snoqualmie Indian Tribe, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation, Muckleshoot Indian Tribe, Stillaguamish Tribe of Indians of Washington	West Seattle Link Extension Section 106 Eligibility and Effects Determination
March 22, 2024	Letter	FTA	The State Historic Preservation Officer	West Seattle Link Extension Section 106 Eligibility and Effects Determination
April 11, 2024	Letter	The State Historic Preservation Officer	FTA	West Seattle Link Extension Project Section 106 Consultation – Determination of Eligibility and Effects letter (2019-02-01457)
April 12, 2024	Email	The State Historic Preservation Officer (staff)	FTA	Notice that the 2018 and 2019 projects were merged in WISAARD, and that the West Seattle Link Extension project now is under the WISAARD project number 2019-02-01457
April 16, 2024	Letter	The State Historic Preservation Officer	FTA	Revised – West Seattle Link Extension Project Section 106 Consultation – Determination of Eligibility and Effects letter (2019-02-01457)

Date	Format	From	То	Description
April 16, 2024	Email	Suquamish Indian Tribe of the Port Madison Reservation	FTA	Concurrence with FTA's Finding of Effect (Adverse Effect to Historic Properties). Also, request for correction be made to the West Seattle Link Extension Historic and Archaeological Resources Technical Report in Appendix A, Section 4.4 Ethnographic Context on page 4-6, where Chief Seattle is referred to as Duwamish only. Request for correction to reference Chief Seattle as Duwamish and Suquamish.
April 17, 2024	Letter	Duwamish Tribe	Sound Transit	Comments on West Seattle Link Extension project
April 18, 2024	Letter	City Historic Preservation Officer	FTA	Noted "general" concurrence on area of potential effects, National Register eligibility, and effects, requested additional information regarding impacts to Fire Station 14 and statement that effects to properties whose National Register eligibility had not yet been concurred on could not be assessed for effects.
May 28, 2024	Letter	FTA	3633 LLC, Buffalo Industries Inc., Charles and Gail Irish, Betty Lindmark, Marilyn Kennel and Alan McMurray, Nesor Investment Co., Quad- Mac LLC, Redwall LLC, Riverside Mill LLC, TCMM LLC	Invitation to to participate as a consulting party under Section 106 of the NRHP for the Sound Transit West Seattle Link Extension Project for individual property owners with properties adversely affected by preferred alternative
June 7, 2024	Email	Colleen Raymond (TCMM LLC)	FTA	Accepting invitation to participate as consulting party in Section 106 for West Seattle Link Extension
June 11, 2024	Email	Alan McMurray (Cettolin House)	FTA	Accepting invitation to participate as consulting party in Section 106 for West Seattle Link Extension
June 12, 2024	Phone Call	Charles Irish	FTA	Phone call from individual consulting party wanting more information on the Section 106 process
June 20, 2024	Email	Daniel O'Malley (Redwall LLC)	FTA	Accepting invitation to participate as consulting party in Section 106 for West Seattle Link Extension

Date	Format	From	То	Description
June 28, 2024	Email	FTA	Advisory Council on Historic Preservation	Invitation to participate in the Section 106 consultation process and development of the Programmatic Agreement for the West Seattle Link Extension Project.
July 3, 2024	Email	Sound Transit	City Historic Preservation Officer, The State Historic Preservation Officer, Alliance for Pioneer Square, Washington Trust for Historic Preservation Suquamish Indian Tribe of the Port Madison Reservation, Snoqualmie Indian Tribe, Tulalip Tribes of Washington, Confederated Tribes and Bands of the Yakama Nation, Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington	West Seattle Link Extension Draft Programmatic Agreement sent to consulting parties for review and comment by July 19, 2024
July 15, 2024	Letter	Advisory Council on Historic Preservation	FTA	Declining to participate in the West Seattle Link Extension Section 106 consultation to resolve adverse effects.
July 18, 2024	Email	Sound Transit	Charles Irish	Follow up email (after phone call) to confirm Sound Transit's error in identifying Mr. Irish's property as being adversely affected by the West Seattle Link Extension Preferred Alternative. It will not be adversely affected by the Preferred Alternative, and thus Mr. Irish would not be considered a consulting party for Section 106 consultation.

APE = area of potential effects

FTA = Federal Transit Administration

N.H.P.A. = National Historic Preservation Act

N.R.H.P = National Register of Historic Places

SEPA = State Environmental Policy Act

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915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 2, 2018

The Honorable Virginia Cross Chairwoman Muckleshoot Indian Tribe 39015 172nd Avenue Southeast Auburn, WA 98092

**Subject: West Seattle and Ballard Link Extensions Initiation of Consultation** 

Dear Chairwoman Cross:

The Federal Transit Administration (FTA) is sending this letter to initiate government-to-government consultation with the Muckleshoot Indian Tribe on the Sound Transit West Seattle and Ballard Link Extensions in King County, Washington described below. FTA is anticipated to be the lead federal agency under the National Environmental Policy Act (NEPA). Sound Transit is the lead agency under the State Environmental Policy Act (SEPA) and is conducting the local planning process. Sound Transit is beginning the alternatives development phase to identify alternatives to study in an Environmental Impact Statement (EIS).

#### Project Description

The West Seattle and Ballard Link Extensions seek to expand the Link light rail system from downtown Seattle to West Seattle and Ballard, and to increase capacity and connectivity for regional connections. Through an extensive planning process, Sound Transit developed representative projects that formed the basis of the Sound Transit 3 (ST3) plan, and established project transit mode, corridor, general station locations, budget, and schedule. The West Seattle representative project would extend light rail 4.7 miles from West Seattle's Alaska Junction neighborhood to downtown Seattle. It includes a bridge over the Duwamish River and stations serving Alaska Junction, Avalon, Delridge, SODO, and the downtown stadiums. The Ballard representative project would extend light rail 7.1 miles from Ballard's Market Street area to downtown Seattle. It includes a new downtown tunnel, a bridge over Salmon Bay, and stations serving International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

## Initiation of Consultation

Sound Transit will be contacting you to invite your participation throughout this process. From February 2nd to March 5th, Sound Transit is conducting a SEPA early scoping process. This process will include public and agency meetings to which your tribe will be invited to participate. FTA and Sound Transit may also hold a NEPA early scoping process later in 2018. We anticipate that about one year from now, in early 2019, the NEPA process will formally begin with a Notice of Intent issued in the Federal Register. At that time, we would request that the Muckleshoot Indian Tribe consult with us under Section 106 of the National Historic Preservation Act.

FTA would also like to extend an offer to meet with your tribe at your convenience. Please do not hesitate to contact me directly at 206-220-7957 or <a href="linda.gehrke@dot.gov">linda.gehrke@dot.gov</a> if you have any concerns. You may also contact Mark Assam, of my staff, at 206-220-4465 or <a href="mark.assam@dot.gov">mark.assam@dot.gov</a>. Lauren Swift with Sound Transit will be reaching out to you to discuss the project. Lauren can be contacted at 206-398-5301 or <a href="lauren.swift@soundtransit.org">lauren.swift@soundtransit.org</a>. We look forward to working with you on this project.

Sincerely,

LINDA M
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Date: 2018/2021/45/649-48/00

Linda M. Gehrke Regional Administrator

cc: Laura Murphy, Muckleshoot Indian Tribe
Karen Walter, Muckleshoot Indian Tribe
Cathal Ridge, Sound Transit
Lauren Swift, Sound Transit
Allyson Brooks, Department of Archaeology and Historic Preservation



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 5, 2018

The Honorable Sunny Clear Snoqualmie Indian Tribe P.O. Box 969 Snoqualmie, WA 98065

Subject: West Seattle and Ballard Link Extensions Initiation of Consultation

Dear Chairwoman Clear:

The Federal Transit Administration (FTA) is sending this letter to initiate government-to-government consultation with the Snoqualmie Indian Tribe on the Sound Transit West Seattle and Ballard Link Extensions in King County, Washington described below. FTA is anticipated to be the lead federal agency under the National Environmental Policy Act (NEPA). Sound Transit is the lead agency under the State Environmental Policy Act (SEPA) and is conducting the local planning process. Sound Transit is beginning the alternatives development phase to identify alternatives to study in an Environmental Impact Statement (EIS).

#### **Project Description**

The West Seattle and Ballard Link Extensions seek to expand the Link light rail system from downtown Seattle to West Seattle and Ballard, and to increase capacity and connectivity for regional connections. Through an extensive planning process, Sound Transit developed representative projects that formed the basis of the Sound Transit 3 (ST3) plan, and established project transit mode, corridor, general station locations, budget, and schedule. The West Seattle representative project would extend light rail 4.7 miles from West Seattle's Alaska Junction neighborhood to downtown Seattle. It includes a bridge over the Duwamish River and stations serving Alaska Junction, Avalon, Delridge, SODO, and the downtown stadiums. The Ballard representative project would extend light rail 7.1 miles from Ballard's Market Street area to downtown Seattle. It includes a new downtown tunnel, a bridge over Salmon Bay, and stations serving International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

## Initiation of Consultation

Sound Transit will be contacting you to invite your participation throughout this process. From February 2nd to March 5th, Sound Transit is conducting a SEPA early scoping process. This process will include public and agency meetings to which your tribe will be invited to participate. FTA and Sound Transit may also hold a NEPA early scoping process later in 2018. We anticipate that about one year from now, in early 2019, the NEPA process will formally begin with a Notice of Intent issued in the Federal Register. At that time, we would request that the Snoqualmie Indian Tribe consult with us under Section 106 of the National Historic Preservation Act.

FTA would also like to extend an offer to meet with your tribe at your convenience. Please do not hesitate to contact me directly at 206-220-7957 or <a href="linda.gehrke@dot.gov">linda.gehrke@dot.gov</a> if you have any concerns. You may also contact Mark Assam, of my staff, at 206-220-4465 or <a href="mark.assam@dot.gov">mark.assam@dot.gov</a>. Lauren Swift with Sound Transit will be reaching out to you to discuss the project. Lauren can be contacted at 206-398-5301 or <a href="lauren.swift@soundtransit.org">lauren.swift@soundtransit.org</a>. We look forward to working with you on this project.

Sincerely,

Digitally signed by LINDA M GEHRKE
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Date: 2018.02.05 07:18:20 -08'00'

Linda M. Gehrke Regional Administrator

cc: Cindy Spiry, Snoqualmie Indian Tribe
Steve Mullen-Moses, Snoqualmie Indian Tribe
Cathal Ridge, Sound Transit
Lauren Swift, Sound Transit
Allyson Brooks, Department of Archaeology and Historic Preservation



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 2, 2018

The Honorable Shawn Yanity Stillaguamish Tribe of Indians of Washington P.O. Box 277 Arlington, WA 98223-0277

Subject: West Seattle and Ballard Link Extensions Initiation of Consultation

Dear Chairman Yanity:

The Federal Transit Administration (FTA) is sending this letter to initiate government-to-government consultation with the Stillaguamish Tribe of Indians of Washington on the Sound Transit West Seattle and Ballard Link Extensions in King County, Washington described below. FTA is anticipated to be the lead federal agency under the National Environmental Policy Act (NEPA). Sound Transit is the lead agency under the State Environmental Policy Act (SEPA) and is conducting the local planning process. Sound Transit is beginning the alternatives development phase to identify alternatives to study in an Environmental Impact Statement (EIS).

#### **Project Description**

The West Seattle and Ballard Link Extensions seek to expand the Link light rail system from downtown Seattle to West Seattle and Ballard, and to increase capacity and connectivity for regional connections. Through an extensive planning process, Sound Transit developed representative projects that formed the basis of the Sound Transit 3 (ST3) plan, and established project transit mode, corridor, general station locations, budget, and schedule. The West Seattle representative project would extend light rail 4.7 miles from West Seattle's Alaska Junction neighborhood to downtown Seattle. It includes a bridge over the Duwamish River and stations serving Alaska Junction, Avalon, Delridge, SODO, and the downtown stadiums. The Ballard representative project would extend light rail 7.1 miles from Ballard's Market Street area to downtown Seattle. It includes a new downtown tunnel, a bridge over Salmon Bay, and stations serving International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

## Initiation of Consultation

Sound Transit will be contacting you to invite your participation throughout this process. From February 2nd to March 5th, Sound Transit is conducting a SEPA early scoping process. This process will include public and agency meetings to which your tribe will be invited to participate. FTA and Sound Transit may also hold a NEPA early scoping process later in 2018. We anticipate that about one year from now, in early 2019, the NEPA process will formally begin with a Notice of Intent issued in the Federal Register. At that time, we would request that the Stillaguamish Tribe of Indians of Washington consult with us under Section 106 of the National Historic Preservation Act.

FTA would also like to extend an offer to meet with your tribe at your convenience. Please do not hesitate to contact me directly at 206-220-7957 or <a href="linda.gehrke@dot.gov">linda.gehrke@dot.gov</a> if you have any concerns. You may also contact Mark Assam, of my staff, at 206-220-4465 or <a href="mark.assam@dot.gov">mark.assam@dot.gov</a>. Lauren Swift with Sound Transit will be reaching out to you to discuss the project. Lauren can be contacted at 206-398-5301 or <a href="mark.assam@dot.gov">lauren.swift@soundtransit.org</a>. We look forward to working with you on this project.

Sincerely,

LINDA M
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FTA SeattleWA, cn-LINDA M GEHRKE
Date: 2018.02.05 of 272.06.0-9800

Linda M. Gehrke Regional Administrator

cc: Pat Stevenson, Stillaguamish Tribe of Indians of Washington
Kerry Lyste, Stillaguamish Tribe of Indians of Washington
Cathal Ridge, Sound Transit
Lauren Swift, Sound Transit
Allyson Brooks, Department of Archaeology and Historic Preservation



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 5, 2018

The Honorable Leonard Forsman Chairman Suquamish Indian Tribe of the Port Madison Reservation P.O. Box 498 Suquamish, WA 98392-0498

**Subject: West Seattle and Ballard Link Extensions Initiation of Consultation** 

Dear Chairman Forsman:

The Federal Transit Administration (FTA) is sending this letter to initiate government-to-government consultation with the Suquamish Indian Tribe of the Port Madison Reservation on the Sound Transit West Seattle and Ballard Link Extensions in King County, Washington described below. FTA is anticipated to be the lead federal agency under the National Environmental Policy Act (NEPA). Sound Transit is the lead agency under the State Environmental Policy Act (SEPA) and is conducting the local planning process. Sound Transit is beginning the alternatives development phase to identify alternatives to study in an Environmental Impact Statement (EIS).

#### Project Description

The West Seattle and Ballard Link Extensions seek to expand the Link light rail system from downtown Seattle to West Seattle and Ballard, and to increase capacity and connectivity for regional connections. Through an extensive planning process, Sound Transit developed representative projects that formed the basis of the Sound Transit 3 (ST3) plan, and established project transit mode, corridor, general station locations, budget, and schedule. The West Seattle representative project would extend light rail 4.7 miles from West Seattle's Alaska Junction neighborhood to downtown Seattle. It includes a bridge over the Duwamish River and stations serving Alaska Junction, Avalon, Delridge, SODO, and the downtown stadiums. The Ballard representative project would extend light rail 7.1 miles from Ballard's Market Street area to downtown Seattle. It includes a new downtown tunnel, a bridge over Salmon Bay, and stations serving International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

## Initiation of Consultation

Sound Transit will be contacting you to invite your participation throughout this process. From February 2nd to March 5th, Sound Transit is conducting a SEPA early scoping process. This process will include public and agency meetings to which your tribe will be invited to participate. FTA and Sound Transit may also hold a NEPA early scoping process later in 2018. We anticipate that about one year from now, in early 2019, the NEPA process will formally begin with a Notice of Intent issued in the Federal Register. At that time, we would request that the Suquamish Indian Tribe of the Port Madison Reservation consult with us under Section 106 of the National Historic Preservation Act.

FTA would also like to extend an offer to meet with your tribe at your convenience. Please do not hesitate to contact me directly at 206-220-7957 or <a href="linda.gehrke@dot.gov">linda.gehrke@dot.gov</a> if you have any concerns. You may also contact Mark Assam, of my staff, at 206-220-4465 or <a href="mark.assam@dot.gov">mark.assam@dot.gov</a>. Lauren Swift with Sound Transit will be reaching out to you to discuss the project. Lauren can be contacted at 206-398-5301 or <a href="lauren.swift@soundtransit.org">lauren.swift@soundtransit.org</a>. We look forward to working with you on this project.

Sincerely,

LINDA M GEHRKE DIGITALIS SIGNED SUNDA M GEHRKE GEHRKE GEHRKE GEHRKE GEHRKE GEHRKE

Linda M. Gehrke Regional Administrator

cc: Alison O'Sullivan, Suquamish Indian Tribe of the Port Madison Reservation Dennis Lewarch, Suquamish Indian Tribe of the Port Madison Reservation Cathal Ridge, Sound Transit Lauren Swift, Sound Transit Allyson Brooks, Department of Archaeology and Historic Preservation



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 5, 2018

The Honorable Marie Zackuse Chairwoman Tulalip Tribes of Washington 6406 Marine Drive Northwest Tulalip, WA 98271

**Subject: West Seattle and Ballard Link Extensions Initiation of Consultation** 

Dear Chairwoman Zackuse:

The Federal Transit Administration (FTA) is sending this letter to initiate government-to-government consultation with the Tulalip Tribes of Washington on the Sound Transit West Seattle and Ballard Link Extensions in King County, Washington described below. FTA is anticipated to be the lead federal agency under the National Environmental Policy Act (NEPA). Sound Transit is the lead agency under the State Environmental Policy Act (SEPA) and is conducting the local planning process. Sound Transit is beginning the alternatives development phase to identify alternatives to study in an Environmental Impact Statement (EIS).

#### Project Description

The West Seattle and Ballard Link Extensions seek to expand the Link light rail system from downtown Seattle to West Seattle and Ballard, and to increase capacity and connectivity for regional connections. Through an extensive planning process, Sound Transit developed representative projects that formed the basis of the Sound Transit 3 (ST3) plan, and established project transit mode, corridor, general station locations, budget, and schedule. The West Seattle representative project would extend light rail 4.7 miles from West Seattle's Alaska Junction neighborhood to downtown Seattle. It includes a bridge over the Duwamish River and stations serving Alaska Junction, Avalon, Delridge, SODO, and the downtown stadiums. The Ballard representative project would extend light rail 7.1 miles from Ballard's Market Street area to downtown Seattle. It includes a new downtown tunnel, a bridge over Salmon Bay, and stations serving International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

## Initiation of Consultation

Sound Transit will be contacting you to invite your participation throughout this process. From February 2nd to March 5th, Sound Transit is conducting a SEPA early scoping process. This process will include public and agency meetings to which your tribe will be invited to participate. FTA and Sound Transit may also hold a NEPA early scoping process later in 2018. We anticipate that about one year from now, in early 2019, the NEPA process will formally begin with a Notice of Intent issued in the Federal Register. At that time, we would request that the Tulalip Tribes of Washington consult with us under Section 106 of the National Historic Preservation Act.

FTA would also like to extend an offer to meet with your tribe at your convenience. Please do not hesitate to contact me directly at 206-220-7957 or <a href="linda.gehrke@dot.gov">linda.gehrke@dot.gov</a> if you have any concerns. You may also contact Mark Assam, of my staff, at 206-220-4465 or <a href="mark.assam@dot.gov">mark.assam@dot.gov</a>. Lauren Swift with Sound Transit will be reaching out to you to discuss the project. Lauren can be contacted at 206-398-5301 or <a href="lauren.swift@soundtransit.org">lauren.swift@soundtransit.org</a>. We look forward to working with you on this project.

Sincerely,

LINDA M GEHRKE GEHRKE GLEZO 1802.05 OF 2920 - 08'00'

Linda M. Gehrke Regional Administrator

cc: Kurt Nelson, Tulalip Tribes of Washington
Richard Young, Tulalip Tribes of Washington
Cathal Ridge, Sound Transit
Lauren Swift, Sound Transit
Allyson Brooks, Department of Archaeology and Historic Preservation



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 5, 2018

The Honorable JoDe Goudy Chairman Confederated Tribes and Bands of the Yakama Nation P.O. Box 151 Toppenish, WA 98948

**Subject: West Seattle and Ballard Link Extensions Initiation of Consultation** 

Dear Chairman Goudy:

The Federal Transit Administration (FTA) is sending this letter to initiate government-to-government consultation with the Confederated Tribes and Bands of the Yakama Nation on the Sound Transit West Seattle and Ballard Link Extensions in King County, Washington described below. FTA is anticipated to be the lead federal agency under the National Environmental Policy Act (NEPA). Sound Transit is the lead agency under the State Environmental Policy Act (SEPA) and is conducting the local planning process. Sound Transit is beginning the alternatives development phase to identify alternatives to study in an Environmental Impact Statement (EIS).

#### **Project Description**

The West Seattle and Ballard Link Extensions seek to expand the Link light rail system from downtown Seattle to West Seattle and Ballard, and to increase capacity and connectivity for regional connections. Through an extensive planning process, Sound Transit developed representative projects that formed the basis of the Sound Transit 3 (ST3) plan, and established project transit mode, corridor, general station locations, budget, and schedule. The West Seattle representative project would extend light rail 4.7 miles from West Seattle's Alaska Junction neighborhood to downtown Seattle. It includes a bridge over the Duwamish River and stations serving Alaska Junction, Avalon, Delridge, SODO, and the downtown stadiums. The Ballard representative project would extend light rail 7.1 miles from Ballard's Market Street area to downtown Seattle. It includes a new downtown tunnel, a bridge over Salmon Bay, and stations serving International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

## Initiation of Consultation

Sound Transit will be contacting you to invite your participation throughout this process. From February 2nd to March 5th, Sound Transit is conducting a SEPA early scoping process. This process will include public and agency meetings to which your tribe will be invited to participate. FTA and Sound Transit may also hold a NEPA early scoping process later in 2018. We anticipate that about one year from now, in early 2019, the NEPA process will formally begin with a Notice of Intent issued in the Federal Register. At that time, we would request that the Confederated Tribes and Bands of the Yakama Nation consult with us under Section 106 of the National Historic Preservation Act.

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Sincerely,

LINDA M GEHRKE
DN: c-culs, o-uls. Government, ou=TIA FTA SeattleWA, ou=DIT FTA SeattleWA

Linda M. Gehrke Regional Administrator

cc: Phillip Rigdon, Confederated Tribes and Bands of the Yakama Nation Johnson Meninick, Confederated Tribes and Bands of the Yakama Nation Cathal Ridge, Sound Transit Lauren Swift, Sound Transit Allyson Brooks, Department of Archaeology and Historic Preservation



February 6, 2018

The Honorable Cecile Hansen Tribal Chair Duwamish Tribe 4705 Marginal Way SW Seattle, WA 98106

Subject: West Seattle and Ballard Link Extensions Early Scoping

Dear Chair Hansen,

Sound Transit is sending this early scoping notice to inform the Duwamish Tribe that it will be exploring alternatives for extending Link light rail from downtown Seattle to West Seattle and Ballard in King County, Washington (the West Seattle and Ballard Link Extensions). Early scoping is being conducted under the Washington State Environmental Policy Act (SEPA) rules regarding expanded scoping (WAC 197-11-410). Sound Transit is the lead agency under SEPA.

Early scoping supports the alternatives development process during which Sound Transit will evaluate the costs, benefits, and impacts of a range of light rail alternatives. Alternatives will include the Sound Transit 3 (ST3) representative project and other potential alternative alignment, station, and design configurations that could meet the project's purpose and need. At the end of the alternatives development process, Sound Transit anticipates narrowing the range of alternatives for further environmental review, and the Sound Transit Board is expected to identify a Preferred Alternative.

A description of the ST3 representative project and the project's purpose and need are included in the enclosed Early Scoping Information Report. Additional information is also available on Sound Transit's website at: <a href="www.soundtransit.org/WSBLink">www.soundtransit.org/WSBLink</a>. The West Seattle representative project would extend light rail 4.7 miles from West Seattle's Alaska Junction neighborhood to downtown Seattle. It includes a bridge over the Duwamish River and stations serving Alaska Junction, Avalon, Delridge, SODO, and the downtown stadiums. The Ballard representative project would extend light rail 7.1 miles from Ballard's Market Street area to downtown Seattle. It includes a new downtown tunnel, a bridge over Salmon Bay, and stations serving the International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

Sound Transit invites comments on the project purpose and need, the ST3 representative project, potential alternatives, and the transportation and community impacts and benefits to be considered. If the there is a potential for significant environmental impacts requiring an environmental impact statement (EIS), the Federal Transit Administration (FTA) and Sound Transit will publish a Notice of Intent to prepare an EIS in the Federal Register and invite comments on the scope of the EIS. This is expected to occur in early 2019.

CHAIF

Dave Somers
Snohomish County Executive

**VICE CHAIRS** 

John Marchione
Redmond Mayor

Marilyn Strickland

**BOARD MEMBERS** 

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Auburn Mayor

Claudia Balducci King County Councilmember

> Fred Butler Issaquah Mayor

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Dave Earling Edmonds Mayor

Rob Johnson
Seattle Councilmember

Kent Keel University Place Mayor Pro Tem

Joe McDermott
King County Council Chair

Roger Millar

Washington State Secretary of Transportation

Mary Moss

Lakewood Councilmember

Paul Roberts

Everett Councilmember

Dave Upthegrove
King County Councilmember

Peter von Reichbauer King County Councilmember

CHIEF EXECUTIVE OFFICER
Peter M. Rogoff

Sound Transit invites you and/or representatives of your organization to attend the early scoping meetings and provide comments. Information on the early scoping meetings and ways to provide comments are described below.

#### **MEETINGS**

### Public Meetings:

February 13, 2018, 6:30 pm to 8:30 pm Alki Masonic Center, 4736 40<sup>th</sup> Ave SW, Seattle 98116

February 15, 2018, 6:30 pm to 8:30 pm Leif Erikson Lodge, 2245 NW 57<sup>th</sup> St, Seattle 98107

February 20, 2018, 5:30 pm to 7:30 pm Union Station, 401 S Jackson St. Seattle 98104

## Agency/Tribe Meeting:

February 21, 2018, 1:30 pm to 3:00 pm

Sante Fe Room, Union Station, 401 South Jackson Street, Seattle

To participate remotely by internet and phone:

- 1. Go to: https://HNTB.WEBEX.COM
- 2. Enter the meeting number: 749 506 920
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- 4. Enter the meeting password: 863 214 94
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#### **COMMENTS**

Written scoping comments are requested by March 5, 2018 and can be mailed or emailed to the address below, submitted at the public meetings, or provided via the online comment form.

Mailing Address:

WSB Link Extension

(c/o Lauren Swift, Senior Environmental Planner)

Sound Transit 401 S Jackson Street Seattle, WA 98104-2826

Email Address:

WSBLink@soundtransit.org

Online Comment Form: wsblink.participate.online

If you have any questions related to this early scoping notice or need additional information, please contact me at (206) 398-5301 or at lauren.swift@soundtransit.org.

Sincerely,

Lauren Swift

Senior Environmental Planner

enclosure: Early Scoping Information Report



February 6, 2018

The Honorable Mike Evans Chairman Snohomish Tribe 9792 Edmonds Way #267 Edmonds, WA 98020

Subject: West Seattle and Ballard Link Extensions Early Scoping

Dear Chair Evans,

Sound Transit is sending this early scoping notice to inform the Snohomish Tribe that it will be exploring alternatives for extending Link light rail from downtown Seattle to West Seattle and Ballard in King County, Washington (the West Seattle and Ballard Link Extensions). Early scoping is being conducted under the Washington State Environmental Policy Act (SEPA) rules regarding expanded scoping (WAC 197-11-410). Sound Transit is the lead agency under SEPA.

Early scoping supports the alternatives development process during which Sound Transit will evaluate the costs, benefits, and impacts of a range of light rail alternatives. Alternatives will include the Sound Transit 3 (ST3) representative project and other potential alternative alignment, station, and design configurations that could meet the project's purpose and need. At the end of the alternatives development process, Sound Transit anticipates narrowing the range of alternatives for further environmental review, and the Sound Transit Board is expected to identify a Preferred Alternative.

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VICE CHAIRS

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Lakewood Councilmember

Paul Roberts
Everett Councilmember

Dave Upthegrove
King County Councilmember

Peter von Reichbauer King County Councilmember

CHIEF EXECUTIVE OFFICER
Peter M. Rogoff

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February 15, 2018, 6:30 pm to 8:30 pm Leif Erikson Lodge, 2245 NW 57<sup>th</sup> St, Seattle 98107

February 20, 2018, 5:30 pm to 7:30 pm Union Station, 401 S Jackson St, Seattle 98104

## Agency/Tribe Meeting:

February 21, 2018, 1:30 pm to 3:00 pm

Sante Fe Room, Union Station, 401 South Jackson Street, Seattle

To participate remotely by internet and phone:

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- 3. Press join.
- 4. Enter the meeting password: 863 214 94
- 5. Enter your name and email address and press join
- 7. For audio connection, select "I Will Call In"
- 8. Call US toll free: +1-855-797-9485
- 9. Enter attendee access code: 863 214 94 #
- 10. To indicate that you are not the host, press #
- 11. When asked for your Attendee ID number, enter the Attendee ID provided online or press #

### **COMMENTS**

Written scoping comments are requested by March 5, 2018 and can be mailed or emailed to the address below, submitted at the public meetings, or provided via the online comment form.

Mailing Address:

WSB Link Extension

(c/o Lauren Swift, Senior Environmental Planner)

Sound Transit 401 S Jackson Street Seattle, WA 98104-2826

Email Address:

WSBLink@soundtransit.org

Online Comment Form: wsblink.participate.online

If you have any questions related to this early scoping notice or need additional information, please contact me at (206) 398-5301 or at lauren.swift@soundtransit.org.

Sincerely,

Lauren Swift

Senior Environmental Planner

enclosure: Early Scoping Information Report

## Swift, Lauren

From: Assam, Mark (FTA) <Mark.Assam@dot.gov>
Sent: Thursday, February 08, 2018 2:09 PM

**To:** Swift, Lauren; Hale, Kent

**Cc:** Changchien, Amy (FTA); Horwitz, Jennifer

**Subject:** FW: West Seattle and Ballard Link Extensions - Initiation of Government-to-

**Government Consultation** 

FYI...

#### Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Adam Osbekoff [mailto:adam@snoqualmietribe.us]

**Sent:** Thursday, February 08, 2018 1:37 PM **To:** Assam, Mark (FTA) < Mark. Assam@dot.gov>

Subject: West Seattle and Ballard Link Extensions - Initiation of Government-to-Government Consultation

#### Hello Mark

The Snoqualmie Indian Tribes Department of Archaeology and Historic Preservation have cultural resource concerns and request that a cultural resource survey be completed in ground disturbing areas of potential effect.

Thank you for your time. Adam

Adam Osbekoff
Cultural Resource Compliance Manager
adam@snoqualmietribe.us
425-753-0388
9416 384<sup>th</sup> Ave SE
PO Box 969
Snoqualmie WA 98065

## Swift, Lauren

From: Swift, Lauren

**Sent:** Monday, February 12, 2018 8:47 AM **To:** virginia.cross muckleshoot.nsn.us

**Cc:** karen.walter@muckleshoot.nsn.us; laura.murphy@muckleshoot.nsn.us; Assam, Mark

(FTA); Sterner, Matthew (DAHP)

**Subject:** Sound Transit West Seattle and Ballard Link Extensions

**Attachments:** west-seattle-and-ballard-link-extensions-early-scoping-report.pdf

#### Dear Chairwoman Cross:

As noted in the Federal Transit Administration's February 5th letter requesting initiation of Government to Government consultation, I am following up to provide the West Seattle and Ballard Link Extensions Early Scoping Information report, which includes additional project information. Sound Transit would like to invite you and staff to attend the Agency and Tribal Early Scoping meeting and provide comments as described below. Sound Transit looks forward to consulting with the Tribe and FTA as the project moves forward.

February 21, 2018, 1:30 pm to 3:00 pm, Sante Fe Room, Union Station, 401 South Jackson Street, Seattle.

To participate remotely by internet and phone:

1. Go to: https://HNTB.WEBEX.COM

2. Enter the meeting number: **749 506 920** 

3. Press join.

4. Enter the meeting password: 863 214 94

- 5. Enter your name and email address and press join
- 7. For audio connection, select "I Will Call In"
- 8. Call US toll free: +1-855-797-9485
- 9. Enter attendee access code: **863 214 94** #
- 10. To indicate that you are not the host, press #
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#### **COMMENTS**

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Mailing Address: WSB Link Extension

(c/o Lauren Swift, Senior Environmental Planner)

Sound Transit 401 S Jackson Street Seattle, WA 98104-2826

Email Address: WSBLink@soundtransit.org

Online Comment Form: <u>wsblink.participate.online</u>

Lauren Swift, AICP
Senior Environmental Planner
Environmental Affairs and Sustainability
Sound Transit

W (206) 398-5301 C (206) 696-5072 Connect with us facebook.com/SoundTransit twitter.com/SoundTransit



From: Assam, Mark (FTA) [mailto:Mark.Assam@dot.gov]

Sent: Monday, February 05, 2018 3:26 PM

To: virginia.cross muckleshoot.nsn.us <virginia.cross@muckleshoot.nsn.us>

Cc: karen.walter@muckleshoot.nsn.us; laura.murphy@muckleshoot.nsn.us; Ridge, Cathal

<cathal.ridge@soundtransit.org>; Swift, Lauren <lauren.swift@soundtransit.org>; Brooks, Allyson (DAHP)

<allyson.Brooks@DAHP.WA.GOV>; Sterner, Matthew (DAHP) < Matthew.Sterner@DAHP.WA.GOV>; Changchien, Amy

(FTA) <Amy.Changchien@dot.gov>; Horwitz, Jennifer <jhorwitz@anchorqea.com>; Witmer, John (FTA)

<John.Witmer@dot.gov>

Subject: West Seattle and Ballard Link Extensions - Initiation of Government-to-Government Consultation

Dear Chairwoman Cross:

Please see the attached Government-to-Government Consultation Initiation letter. A hardcopy is also being delivered via U.S. Mail.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

## Swift, Lauren

From: Swift, Lauren

**Sent:** Monday, February 12, 2018 8:47 AM **To:** sunny.clear@snoqualmietribe.us

**Cc:** Cindy@snoqualmietribe.us; Steve@snoqualmietribe.us; 'Assam, Mark (FTA)'; Sterner,

Matthew (DAHP); 'adam@snoqualmietribe.us'

**Subject:** Sound Transit West Seattle and Ballard Link Extensions

**Attachments:** west-seattle-and-ballard-link-extensions-early-scoping-report.pdf

## Dear Chairwoman Clear:

As noted in the Federal Transit Administration's February 5th letter requesting initiation of Government to Government consultation, I am following up to provide the West Seattle and Ballard Link Extensions Early Scoping Information report, which includes additional project information. Sound Transit would like to invite you and staff to attend the Agency and Tribal Early Scoping meeting and provide comments as described below. We are in receipt of Adam Osbekoff's email regarding cultural resource survey in response to FTA's February 5<sup>th</sup> transmittal, and we will include that in the early scoping comments. Sound Transit looks forward to consulting with the Tribe and FTA as the project moves forward.

February 21, 2018, 1:30 pm to 3:00 pm, Sante Fe Room, Union Station, 401 South Jackson Street, Seattle.

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(c/o Lauren Swift, Senior Environmental Planner)

Sound Transit 401 S Jackson Street Seattle, WA 98104-2826

Email Address: WSBLink@soundtransit.org

Online Comment Form: wsblink.participate.online

Lauren Swift, AICP Senior Environmental Planner Environmental Affairs and Sustainability
Sound Transit
W (206) 398-5301
C (206) 696-5072
Connect with us
facebook.com/SoundTransit
twitter.com/SoundTransit



From: Assam, Mark (FTA) [mailto:Mark.Assam@dot.gov]

**Sent:** Monday, February 05, 2018 3:26 PM **To:** sunny.clear@snoqualmietribe.us

**Cc:** Cindy@snoqualmietribe.us; Steve@snoqualmietribe.us; Ridge, Cathal <cathal.ridge@soundtransit.org>; Swift, Lauren <lauren.swift@soundtransit.org>; Brooks, Allyson (DAHP) <Allyson.Brooks@DAHP.WA.GOV>; Sterner, Matthew (DAHP) <Matthew.Sterner@DAHP.WA.GOV>; Changchien, Amy (FTA) <Amy.Changchien@dot.gov>; Horwitz, Jennifer <jhorwitz@anchorqea.com>; Witmer, John (FTA) <John.Witmer@dot.gov>

Subject: West Seattle and Ballard Link Extensions - Initiation of Government-to-Government Consultation

Dear Chairwoman Clear:

Please see the attached Government-to-Government Consultation Initiation letter. A hardcopy is also being delivered via U.S. Mail.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Swift, Lauren

To: syanity stillaguamish.com

Cc: pstevenson@stillaquamish.com; KLyste@stillaquamish.com; Sterner, Matthew (DAHP); "Assam, Mark (FTA)"

**Subject:** Sound Transit West Seattle and Ballard Link Extensions

**Date:** Monday, February 12, 2018 8:47:00 AM

**Attachments:** west-seattle-and-ballard-link-extensions-early-scoping-report.pdf

image003.png

#### Dear Chairman Yanity:

As noted in the Federal Transit Administration's February 5th letter requesting initiation of Government to Government consultation, I am following up to provide the West Seattle and Ballard Link Extensions Early Scoping Information report, which includes additional project information. Sound Transit would like to invite you and staff to attend the Agency and Tribal Early Scoping meeting and provide comments as described below. Sound Transit looks forward to consulting with the Tribe and FTA as the project moves forward.

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Sound Transit 401 S Jackson Street Seattle, WA 98104-2826

Email Address: WSBLink@soundtransit.org

Online Comment Form: <u>wsblink.participate.online</u>

Lauren Swift, AICP Senior Environmental Planner Environmental Affairs and Sustainability Sound Transit W (206) 398-5301 C (206) 696-5072 Connect with us facebook.com/SoundTransit twitter.com/SoundTransit



**From:** Assam, Mark (FTA) [mailto:Mark.Assam@dot.gov]

Sent: Monday, February 05, 2018 3:26 PM

**To:** syanity stillaguamish.com <syanity@stillaguamish.com>

**Cc:** pstevenson@stillaguamish.com; KLyste@stillaguamish.com; Ridge, Cathal <cathal.ridge@soundtransit.org>; Swift, Lauren <lauren.swift@soundtransit.org>; Brooks, Allyson (DAHP) <Allyson.Brooks@DAHP.WA.GOV>; Sterner, Matthew (DAHP)

<Matthew.Sterner@DAHP.WA.GOV>; Changchien, Amy (FTA) <Amy.Changchien@dot.gov>; Horwitz, Jennifer <jhorwitz@anchorqea.com>; Witmer, John (FTA) <John.Witmer@dot.gov>

**Subject:** West Seattle and Ballard Link Extensions - Initiation of Government-to-Government Consultation

Dear Chairman Yanity:

Please see the attached Government-to-Government Consultation Initiation letter. A hardcopy is also being delivered via U.S. Mail.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

## Swift, Lauren

From: Swift, Lauren

Sent: Monday, February 12, 2018 8:47 AM

**To:** Iforsman suquamish.nsn.us

**Cc:** aosullivan@suquamish.nsn.us; 'Assam, Mark (FTA)'; dlewarch@suquamish.nsn.us;

Sterner, Matthew (DAHP)

**Subject:** Sound Transit West Seattle and Ballard Link Extensions

**Attachments:** west-seattle-and-ballard-link-extensions-early-scoping-report.pdf

#### Dear Chairman Forsman:

As noted in the Federal Transit Administration's February 5th letter requesting initiation of Government to Government consultation, I am following up to provide the West Seattle and Ballard Link Extensions Early Scoping Information report, which includes additional project information. Sound Transit would like to invite you and staff to attend the Agency and Tribal Early Scoping meeting and provide comments as described below. Sound Transit looks forward to consulting with the Tribe and FTA as the project moves forward.

February 21, 2018, 1:30 pm to 3:00 pm, Sante Fe Room, Union Station, 401 South Jackson Street, Seattle.

To participate remotely by internet and phone:

1. Go to: https://HNTB.WEBEX.COM

2. Enter the meeting number: **749 506 920** 

3. Press join.

4. Enter the meeting password: 863 214 94

- 5. Enter your name and email address and press join
- 7. For audio connection, select "I Will Call In"
- 8. Call US toll free: +1-855-797-9485
- 9. Enter attendee access code: **863 214 94** #
- 10. To indicate that you are not the host, **press** #
- 11. When asked for your Attendee ID number, enter the **Attendee ID** provided online or **press** #

#### **COMMENTS**

Written scoping comments are requested by March 5, 2018 and can be mailed or emailed to the address below, submitted at the public meetings, or provided via the online comment form.

Mailing Address: WSB Link Extension

(c/o Lauren Swift, Senior Environmental Planner)

Sound Transit 401 S Jackson Street Seattle, WA 98104-2826

Email Address: WSBLink@soundtransit.org

Online Comment Form: <u>wsblink.participate.online</u>

Lauren Swift, AICP
Senior Environmental Planner
Environmental Affairs and Sustainability
Sound Transit

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To: Iforsman suquamish.nsn.us < Iforsman@suquamish.nsn.us >

**Cc:** aosullivan@suquamish.nsn.us; dlewarch@suquamish.nsn.us; Ridge, Cathal <cathal.ridge@soundtransit.org>; Swift, Lauren <lauren.swift@soundtransit.org>; Brooks, Allyson (DAHP) <Allyson.Brooks@DAHP.WA.GOV>; Sterner, Matthew (DAHP) <Matthew.Sterner@DAHP.WA.GOV>; Changchien, Amy (FTA) <Amy.Changchien@dot.gov>; Horwitz, Jennifer <jhorwitz@anchorqea.com>; Witmer, John (FTA) <John.Witmer@dot.gov>

Subject: West Seattle and Ballard Link Extensions - Initiation of Government-to-Government Consultation

## Dear Chairman Forsman:

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Thanks,

## Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

## Swift, Lauren

From: Swift, Lauren

**Sent:** Monday, February 12, 2018 8:47 AM **To:** mzackuse@tulaliptribes-nsn.gov

**Cc:** knelson@tulaliptribes-nsn.gov; ryoung@tulaliptribes-nsn.gov; 'Assam, Mark (FTA)';

Sterner, Matthew (DAHP)

**Subject:** Sound Transit West Seattle and Ballard Link Extensions

**Attachments:** west-seattle-and-ballard-link-extensions-early-scoping-report.pdf

## Dear Chairwoman Zackuse:

As noted in the Federal Transit Administration's February 5th letter requesting initiation of Government to Government consultation, I am following up to provide the West Seattle and Ballard Link Extensions Early Scoping Information report, which includes additional project information. Sound Transit would like to invite you and staff to attend the Agency and Tribal Early Scoping meeting and provide comments as described below. Sound Transit looks forward to consulting with the Tribe and FTA as the project moves forward.

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Mailing Address: WSB Link Extension

(c/o Lauren Swift, Senior Environmental Planner)

Sound Transit 401 S Jackson Street Seattle, WA 98104-2826

Email Address: <u>WSBLink@soundtransit.org</u>

Online Comment Form: <u>wsblink.participate.online</u>

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Mark A. Assam, AICP

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915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

## Swift, Lauren

From: Swift, Lauren

Sent: Monday, February 12, 2018 8:47 AM

**To:** JoDe yakama.com

**Cc:** prigdon@yakama.com; johnson@yakama.com; Elizabeth\_Sanchey@yakama.com;

Assam, Mark (FTA); Sterner, Matthew (DAHP)

**Subject:** Sound Transit West Seattle and Ballard Link Extensions

**Attachments:** west-seattle-and-ballard-link-extensions-early-scoping-report.pdf

## Dear Chairman Goudy:

As noted in the Federal Transit Administration's February 5th letter requesting initiation of Government to Government consultation, I am following up to provide the West Seattle and Ballard Link Extensions Early Scoping Information report, which includes additional project information. Sound Transit would like to invite you and staff to attend the Agency and Tribal Early Scoping meeting and provide comments as described below. Sound Transit looks forward to consulting with the Tribe and FTA as the project moves forward.

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(c/o Lauren Swift, Senior Environmental Planner)

Sound Transit 401 S Jackson Street Seattle, WA 98104-2826

Email Address: WSBLink@soundtransit.org

Online Comment Form: <u>wsblink.participate.online</u>

Lauren Swift, AICP
Senior Environmental Planner
Environmental Affairs and Sustainability
Sound Transit

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**Sent:** Monday, February 05, 2018 3:26 PM **To:** JoDe yakama.com < JoDe@yakama.com >

Cc: prigdon@yakama.com; johnson@yakama.com; Elizabeth\_Sanchey@yakama.com; Ridge, Cathal <cathal.ridge@soundtransit.org>; Swift, Lauren <lauren.swift@soundtransit.org>; Brooks, Allyson (DAHP) <Allyson.Brooks@DAHP.WA.GOV>; Sterner, Matthew (DAHP) <Matthew.Sterner@DAHP.WA.GOV>; Changchien, Amy (FTA) <Amy.Changchien@dot.gov>; Horwitz, Jennifer <jhorwitz@anchorqea.com>; Witmer, John (FTA) <John.Witmer@dot.gov>

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Mark A. Assam, AICP

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Federal Transit Administration, Region X
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February 14, 2019

The Honorable Cecile A. Hansen Chairwoman Duwamish Tribe 4705 West Marginal Way SW Seattle, WA 98106

RE: Sound Transit West Seattle and Ballard Extensions Project Invitation to Participate in the Environmental Review Process and Scoping

#### Dear Chairwoman Hansen:

Sound Transit and the Federal Transit Administration (FTA) are initiating the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). FTA will be the lead agency under NEPA, and Sound Transit will be the lead agency under SEPA.

The WSBLE Project seeks to expand Link light rail service from downtown Seattle to West Seattle's Alaska Junction area and to Ballard's Market Street area in Seattle, King County, Washington. The Project corridor is approximately 11.8 miles long and includes fourteen stations that serve the following areas in Seattle: Alaska Junction, Avalon, Delridge, SODO, the sports stadiums, International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard. The Project is part of the Sound Transit 3 (ST3) Plan of regional transit system investments, approved for funding by voters in the region in 2016. It is needed to provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

The SEPA Determination of Significance and a Scoping Information Report that provides information on the Project including a map of potential alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary purpose and need statement is enclosed. Additional information is available on Sound Transit's website at www.soundtransit.org/WSBLink.

## **Invitation to Participate in the Environmental Review Process**

Section 139 of title 23, U.S. Code (U.S.C), as amended by section 1304 of the Fixing America's Surface Transportation (FAST) Act, enhances the environmental review process for certain FTA projects, including this one, providing more transparency and defining opportunities for participation. Therefore, the lead agencies must identify any other Federal, State, local or Tribal government that may have an interest in the Project and invite them to become participating or cooperating agencies in the environmental review process.

CHAIR

John Marchione Redmond Mayor

**VICE CHAIRS** 

Kent Keel University Place Mayor

Paul Roberts
Everett Councilmember

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Washington State Secretary of Transportation

Kim Roscoe Fife Mayor

Dave Somers
Snohomish County Executive

Dave Upthegrove
King County Councilmember

Peter von Reichbauer King County Councilmember

Victoria Woodards
Tacoma Mayor

CHIEF EXECUTIVE OFFICER
Peter M. Rogoff

We have preliminarily identified the Duwamish Tribe as potentially interested in the WSBLE Project and invite you to become actively involved as a participating agency in the environmental review process.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially in regard to the development
  of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail
  for the analysis of alternatives.
- Identify, as early as practicable, any issues of concern regarding the Project's potential impacts.
- Provide meaningful and timely input on unresolved issues.
- Participate in the EIS scoping process.
- Concur with the schedule in the Agency and Tribal Coordination Plan.

You do not have to accept this invitation. If, however, you elect not to become a participating agency we request that you decline this invitation in writing. In order to give agencies and tribes adequate opportunity to weigh the relevance of their participation in this environmental review process, written responses to this invitation are not requested until the close of the scoping process. Please use the attached Agency Designation form to accept or decline this invitation by March 18, 2019. Your will be treated as a participating agency unless we receive your written response declining to such designations outlined above by March 18, 2019.

FTA and Sound Transit will prepare an Agency and Tribal Coordination Plan in accordance with 23 USC 139(g)(1) with the objective of identifying key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. If you elect to become a participating agency, we will send you the Agency and Tribal Coordination Plan and request your concurrence with the schedule pursuant to 23 USC 139(g)(1)(B).

In addition, pursuant to 36 Code of Federal Regulations (CFR) Part 800, Protection of Historic Properties, implementing Section 106 of the National Historic Preservation Act (NHPA), Sound Transit in coordination with FTA will consult with you under Section 106. Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties through consultation with parties having an interest in the effects of an action on historic properties in the early stages of project planning.

#### Scoping

Sound Transit previously conducted "early scoping" under SEPA for the alternatives development phase of the Project from February 2nd through March 5th, 2018. The Early Scoping Summary Report describes the early scoping process and provides a summary of the comments which were received. The report can be accessed on Sound Transit's website at: <a href="https://www.soundtransit.org/get-to-know-us/documents-reports/west-seattle-ballard-link-extensions-early-scoping-summary-report">https://www.soundtransit.org/get-to-know-us/documents-reports/west-seattle-ballard-link-extensions-early-scoping-summary-report</a>.

Sound Transit invites you or a delegate to attend the agency and tribe scoping meeting on March 5, 2019 at Sound Transit's Sante Fe Room, Union Station, 401 South Jackson Street, Seattle, Washington 98104 from 1:00 to 3:00 pm. If you are unable to attend in person, you can participate online through GoToWebinar. To participate online please register before the meeting at: <a href="http://bit.ly/WSBscoping">http://bit.ly/WSBscoping</a>. After registering, you will receive a confirmation email containing information about joining the webinar.

The scoping period will extend to March 18, 2019. Scoping comments are requested on the Project's preliminary Purpose and Need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please contact me at Sound Transit at 206-398-5301 or <a href="mailto:lauren.swift@soundtransit.org">lauren.swift@soundtransit.org</a>.

Sincerely,

Lauren Swift

Central Corridor Environmental Manager

cc:

Mark Assam, FTA

Enclosures:

SEPA Determination of Significance

Scoping Information Report

Participating Agency Designation Form

## WEST SEATTLE AND BALLARD LINK EXENSIONS PROJECT PARTICIPATING AGENCY DESIGNATION

	Yes, the Duwamish Tribe wishes to be designated as a participating agency for the proposed West Seattle and Ballard Link Extensions (WSBLE) project.		
	No, the Duwamish Tribe does not wish to be designated as a participating agency for the WSBLE project because:  agency has no jurisdiction or authority with respect to the project agency has no expertise or information relevant to the project agency does not intend to submit comments on the project*		
	(Sign – Authorized Representative)		
	(Print)		
	(Title)		
	(D-4-)		
	(Date)		

Please return by March 18, 2019 to:

Lauren Swift Central Corridor Environmental Manager Sound Transit 401 S Jackson Street Seattle, WA 98104-2826 Phone: (206) 398-5301



February 14, 2019

The Honorable Michael didahalqid Evans Chairman Snohomish Tribe PO Box 267 Edmonds, WA 98020

RE: Sound Transit West Seattle and Ballard Extensions Project Invitation to Participate in the Environmental Review Process and Scoping

## Dear Chairman Evans:

Sound Transit and the Federal Transit Administration (FTA) are initiating the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). FTA will be the lead agency under NEPA, and Sound Transit will be the lead agency under SEPA.

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The SEPA Determination of Significance and a Scoping Information Report that provides information on the Project including a map of potential alternatives, possible topics to be evaluated in the EIS, a preliminary schedule for the EIS process, and a preliminary purpose and need statement is enclosed. Additional information is available on Sound Transit's website at www.soundtransit.org/WSBLink.

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Kent Keel University Place Mayor

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King County Councilmember

Roger Millar

Washington State Secretary of Transportation

Kim Roscoe Fife Mayor

Dave Somers
Snohomish County Executive

Dave Upthegrove
King County Councilmember

Peter von Reichbauer King County Councilmember

Victoria Woodards
Tacoma Mayor

CHIEF EXECUTIVE OFFICER
Peter M. Rogoff

We have preliminarily identified the Snohomish Tribe as potentially interested in the WSBLE Project and invite you to become actively involved as a participating agency in the environmental review process.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially in regard to the development
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- Identify, as early as practicable, any issues of concern regarding the Project's potential impacts.
- Provide meaningful and timely input on unresolved issues.
- Participate in the EIS scoping process.
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Sincerely,

Lauren Swift

Central Corridor Environmental Manager

cc:

Mark Assam, FTA

**Enclosures:** 

SEPA Determination of Significance

Scoping Information Report

Participating Agency Designation Form

## WEST SEATTLE AND BALLARD LINK EXENSIONS PROJECT PARTICIPATING AGENCY DESIGNATION

	Yes, the Snohomish Tribe wishes to be designated as a participating agency for the proposed Wesseattle and Ballard Link Extensions (WSBLE) project.		
	No, the Snohomish Tribe does not wish to be designated as a participating agency for the WSBLE project because:  agency has no jurisdiction or authority with respect to the project  agency has no expertise or information relevant to the project  agency does not intend to submit comments on the project*		
	(Sign – Authorized Representative)		
	(Print)		
	(Title)		
	(Date)		

Please return by March 18, 2019 to:

Lauren Swift Central Corridor Environmental Manager Sound Transit 401 S Jackson Street Seattle, WA 98104-2826 Phone: (206) 398-5301

To: <u>"karen.walter@muckleshoot.nsn.us"</u>; <u>"laura.murphy@muckleshoot.nsn.us"</u>

Cc: Assam, Mark (FTA)

Subject: West Seattle and Ballard Link Extension - Scoping and SEPA Determination of Significance

**Date:** Friday, February 15, 2019 4:27:00 PM

Attachments: <u>image001.pnq</u>

WSBLE SEPA DS 20190215.pdf

#### Karen and Laura:

The Federal Transit Administration (FTA) and Sound Transit are initiating preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions Project. The Project will extend Link light rail from downtown Seattle to West Seattle's Alaska Junction area and to Ballard's Market Street area in Seattle, King County Washington. FTA and Sound Transit will prepare the EIS in accordance with the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA). FTA is the lead agency under NEPA and Sound Transit is the lead agency under the SEPA.

As the lead SEPA agency, Sound Transit is sending the attached SEPA Determination of Significance (DS). The DS includes information on the project and the scoping comment period that extends to March 18<sup>th</sup>. FTA will be sending a letter to Chairwoman Cross with you as a cc inviting the Muckleshoot Indian Tribe to participate in the environmental review process and initiating consultation under Section 106.

The FTA letter will include an invitation to attend a tribe and agency scoping meeting on March 5<sup>th</sup> from 1:00 – 3:00 p.m. PST. The meeting will be held in the Sound Transit Sante Fe Room located at Union Station, 401 South Jackson Street, Seattle, WA 98104. You can also participate online through GoToWebinar. To participate online, please register before the meeting at: <a href="http://bit.ly/WSBscoping">http://bit.ly/WSBscoping</a>. After registering, you will receive a confirmation email containing information about joining the webinar and the option to add an Outlook appointment to your calendar.

More information on the Project is available on Sound Transit's website at: <a href="https://www.soundtransit.org/WSBLink">www.soundtransit.org/WSBLink</a>. Please contact me or Mark Assam at FTA (206-220-4465, <a href="mailto:Mark.Assam@dot.gov">Mark.Assam@dot.gov</a>) if you have any questions.

Thank you, Erin

## Erin Green

Environmental Planner Environmental Affairs and Sustainability Sound Transit (206) 398-5464

Connect with us facebook.com/SoundTransit twitter.com/SoundTransit



From: <u>Green, Erin</u>

To: <u>Steve@snoqualmietribe.us</u>; <u>Cindy@snoqualmietribe.us</u>

Cc: Assam, Mark (FTA)

**Subject:** West Seattle and Ballard Link Extension - Scoping and SEPA Determination of Significance

**Date:** Friday, February 15, 2019 4:28:00 PM

Attachments: <u>image001.png</u>

WSBLE SEPA DS 20190215.pdf

Mr. Mullen-Moses and Ms. Spiry:

The Federal Transit Administration (FTA) and Sound Transit are initiating preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions Project. The Project will extend Link light rail from downtown Seattle to West Seattle's Alaska Junction area and to Ballard's Market Street area in Seattle, King County Washington. FTA and Sound Transit will prepare the EIS in accordance with the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA). FTA is the lead agency under NEPA and Sound Transit is the lead agency under the SEPA.

As the lead SEPA agency, Sound Transit is sending the attached SEPA Determination of Significance (DS). The DS includes information on the project and the scoping comment period that extends to March 18<sup>th</sup>. FTA will be sending a letter to Chairman Robert de los Angeles with you as a cc inviting the Snoqualmie Indian Tribe to participate in the environmental review process and initiating consultation under Section 106.

The FTA letter will include an invitation to attend a tribe and agency scoping meeting on March 5<sup>th</sup> from 1:00 – 3:00 p.m. PST. The meeting will be held in the Sound Transit Sante Fe Room located at Union Station, 401 South Jackson Street, Seattle, WA 98104. You can also participate online through GoToWebinar. To participate online, please register before the meeting at: <a href="http://bit.ly/WSBscoping">http://bit.ly/WSBscoping</a>. After registering, you will receive a confirmation email containing information about joining the webinar and the option to add an Outlook appointment to your calendar.

More information on the Project is available on Sound Transit's website at: <a href="https://www.soundtransit.org/WSBLink">www.soundtransit.org/WSBLink</a>. Please contact me or Mark Assam at FTA (206-220-4465, <a href="mailto:Mark.Assam@dot.gov">Mark.Assam@dot.gov</a>) if you have any questions.

Thank you, Erin

#### Erin Green

Environmental Planner Environmental Affairs and Sustainability Sound Transit (206) 398-5464

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## twitter.com/SoundTransit



To: "pstevenson@stillaguamish.com"; Kerry Lyste

Cc: Assam, Mark (FTA)

**Subject:** West Seattle and Ballard Link Extension - Scoping and SEPA Determination of Significance

**Date:** Friday, February 15, 2019 4:28:00 PM

Attachments: <u>image001.png</u>

WSBLE SEPA DS 20190215.pdf

## Kerry and Pat,

The Federal Transit Administration (FTA) and Sound Transit are initiating preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions Project. The Project will extend Link light rail from downtown Seattle to West Seattle's Alaska Junction area and to Ballard's Market Street area in Seattle, King County Washington. FTA and Sound Transit will prepare the EIS in accordance with the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA). FTA is the lead agency under NEPA and Sound Transit is the lead agency under the SEPA.

As the lead SEPA agency, Sound Transit is sending the attached SEPA Determination of Significance (DS). The DS includes information on the project and the scoping comment period that extends to March 18<sup>th</sup>. FTA will be sending a letter to Chairman Yanity with you as a cc inviting the Stillaguamish Tribe of Indians of Washington to participate in the environmental review process and initiating consultation under Section 106.

The FTA letter will include an invitation to attend a tribe and agency scoping meeting on March 5<sup>th</sup> from 1:00 – 3:00 p.m. PST. The meeting will be held in the Sound Transit Sante Fe Room located at Union Station, 401 South Jackson Street, Seattle, WA 98104. You can also participate online through GoToWebinar. To participate online, please register before the meeting at: <a href="http://bit.ly/WSBscoping">http://bit.ly/WSBscoping</a>. After registering, you will receive a confirmation email containing information about joining the webinar and the option to add an Outlook appointment to your calendar.

More information on the Project is available on Sound Transit's website at: <a href="https://www.soundtransit.org/WSBLink">www.soundtransit.org/WSBLink</a>. Please contact me or Mark Assam at FTA (206-220-4465, <a href="mark.Assam@dot.gov">Mark.Assam@dot.gov</a>) if you have any questions.

Thank you, Erin

## Erin Green

Environmental Planner Environmental Affairs and Sustainability Sound Transit (206) 398-5464

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To: "aosullivan@suquamish.nsn.us"; "dlewarch@suquamish.nsn.us"; "rbrooks@suquamish.nsn.us"

Cc: Assam, Mark (FTA)

Subject: West Seattle and Ballard Link Extension - Scoping and SEPA Determination of Significance

**Date:** Friday, February 15, 2019 4:28:00 PM

Attachments: <u>image001.png</u>

WSBLE SEPA DS 20190215.pdf

## Alison, Rich, and Dennis:

The Federal Transit Administration (FTA) and Sound Transit are initiating preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions Project. The Project will extend Link light rail from downtown Seattle to West Seattle's Alaska Junction area and to Ballard's Market Street area in Seattle, King County Washington. FTA and Sound Transit will prepare the EIS in accordance with the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA). FTA is the lead agency under NEPA and Sound Transit is the lead agency under the SEPA.

As the lead SEPA agency, Sound Transit is sending the attached SEPA Determination of Significance (DS). The DS includes information on the project and the scoping comment period that extends to March 18<sup>th</sup>. The DS includes information on the project and the scoping comment period that extends to March 18<sup>th</sup>. FTA will be sending a letter to Chairman Forsman with you as a cc inviting the Suquamish Tribe to participate in the environmental review process and initiating consultation under Section 106.

The FTA letter will include an invitation to attend a tribe and agency scoping meeting on March 5<sup>th</sup> from 1:00 – 3:00 p.m. PST. The meeting will be held in the Sound Transit Sante Fe Room located at Union Station, 401 South Jackson Street, Seattle, WA 98104. You can also participate online through GoToWebinar. To participate online, please register before the meeting at: <a href="http://bit.ly/WSBscoping">http://bit.ly/WSBscoping</a>. After registering, you will receive a confirmation email containing information about joining the webinar and the option to add an Outlook appointment to your calendar.

More information on the Project is available on Sound Transit's website at:

www.soundtransit.org/WSBLink. Please contact me or Mark Assam at FTA (206-220-4465,

Mark.Assam@dot.gov) if you have any questions. Thank you for your ongoing coordination on the project!

Thank you, Erin

## Erin Green

Environmental Planner Environmental Affairs and Sustainability Sound Transit (206) 398-5464

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To: <a href="mailto:">"knelson@tulaliptribes-nsn.gov"</a>; "ryoung@tulaliptribes-nsn.gov"

Cc: Assam, Mark (FTA)

Subject: West Seattle and Ballard Link Extension - Scoping and SEPA Determination of Significance

**Date:** Friday, February 15, 2019 4:28:00 PM

Attachments: <u>image001.pnq</u>

WSBLE SEPA DS 20190215.pdf

## Mr. Nelson and Mr. Young:

The Federal Transit Administration (FTA) and Sound Transit are initiating preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions Project. The Project will extend Link light rail from downtown Seattle to West Seattle's Alaska Junction area and to Ballard's Market Street area in Seattle, King County Washington. FTA and Sound Transit will prepare the EIS in accordance with the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA). FTA is the lead agency under NEPA and Sound Transit is the lead agency under the SEPA.

As the lead SEPA agency, Sound Transit is sending the attached SEPA Determination of Significance (DS). The DS includes information on the project and the scoping comment period that extends to March 18<sup>th</sup>. FTA will be sending a letter to Chairwoman Zackuse with you as a cc inviting Tulalip Tribe to participate in the environmental review process and initiating consultation under Section 106.

The FTA letter will include an invitation to attend a tribe and agency scoping meeting on March 5<sup>th</sup> from 1:00 – 3:00 p.m. PST. The meeting will be held in the Sound Transit Sante Fe Room located at Union Station, 401 South Jackson Street, Seattle, WA 98104. You can also participate online through GoToWebinar. To participate online, please register before the meeting at: <a href="http://bit.ly/WSBscoping">http://bit.ly/WSBscoping</a>. After registering, you will receive a confirmation email containing information about joining the webinar and the option to add an Outlook appointment to your calendar.

More information on the Project is available on Sound Transit's website at: <a href="https://www.soundtransit.org/WSBLink">www.soundtransit.org/WSBLink</a>. Please contact me or Mark Assam at FTA (206-220-4465, <a href="mailto:Mark.Assam@dot.gov">Mark.Assam@dot.gov</a>) if you have any questions.

Thank you, Erin

## Erin Green

Environmental Planner Environmental Affairs and Sustainability Sound Transit (206) 398-5464

Connect with us facebook.com/SoundTransit twitter.com/SoundTransit



To: "prigdon@yakama.com"; "johnson@yakama.com"

Cc: Assam, Mark (FTA)

Subject: West Seattle and Ballard Link Extension - Scoping and SEPA Determination of Significance

**Date:** Friday, February 15, 2019 4:29:00 PM

Attachments: <u>image001.pnq</u>

WSBLE SEPA DS 20190215.pdf

## Mr. Rigdon and Mr. Johnson:

The Federal Transit Administration (FTA) and Sound Transit are initiating preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions Project. The Project will extend Link light rail from downtown Seattle to West Seattle's Alaska Junction area and to Ballard's Market Street area in Seattle, King County Washington. FTA and Sound Transit will prepare the EIS in accordance with the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA). FTA is the lead agency under NEPA and Sound Transit is the lead agency under the SEPA.

As the lead SEPA agency, Sound Transit is sending the attached SEPA Determination of Significance (DS). The DS includes information on the project and the scoping comment period that extends to March 18<sup>th</sup>. FTA will be sending a letter to Chairman Goudy with you as a cc inviting the Confederated Tribes and Bands of the Yakama Nation to participate in the environmental review process and initiating consultation under Section 106.

The FTA letter will include an invitation to attend a tribe and agency scoping meeting on March 5<sup>th</sup> from 1:00 – 3:00 p.m. PST. The meeting will be held in the Sound Transit Sante Fe Room located at Union Station, 401 South Jackson Street, Seattle, WA 98104. You can also participate online through GoToWebinar. To participate online, please register before the meeting at: <a href="http://bit.ly/WSBscoping">http://bit.ly/WSBscoping</a>. After registering, you will receive a confirmation email containing information about joining the webinar and the option to add an Outlook appointment to your calendar.

More information on the Project is available on Sound Transit's website at: <a href="https://www.soundtransit.org/WSBLink">www.soundtransit.org/WSBLink</a>. Please contact me or Mark Assam at FTA (206-220-4465, <a href="mark.Assam@dot.gov">Mark.Assam@dot.gov</a>) if you have any questions.

Thank you, Erin

## Erin Green

Environmental Planner Environmental Affairs and Sustainability Sound Transit (206) 398-5464

Connect with us facebook.com/SoundTransit twitter.com/SoundTransit



Cc: Swift; Lauren; Assam, Mark (FTA)

Bcc: "rnelson@achp.gov"; "Dan.Shoemaker@faa.gov"; "Daniel.Mathis@dot.gov"; "Sharon.Love@dot.gov";

Kachadoorian, Lydia (FRA) (lydia.kachadoorian@dot.gov), "Robert.Loken@dot.gov",

"scott.anderson@noaa.gov"; "Barry.Thom@noaa.gov"; "matthew.j.bennett@usace.army.mil"; "Andrew.J.Shuckhart@usace.army.mil"; "Tammi.Poitra@BIA.gov"; "Steven.M.Fischer3@uscg.mil"; "Jeff.McMorris@hud.gov"; "Kathleen Chiang@ios.doi.gov"; Somers, Elaine; "jim muck@fws.gov";

"chaun.benjamin@gsa.gov", "rpduda@fbi.gov", "sepa@dahp.wa.gov"

**Subject:** West Seattle and Ballard Link Extension SEPA Determination of Significance

**Date:** Friday, February 15, 2019 4:27:00 PM

Attachments: <u>image001.png</u>

WSBLE SEPA DS 20190215.pdf

#### Good Afternoon.

The Federal Transit Administration (FTA) and Sound Transit are initiating preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions Project. The Project will extend Link light rail from downtown Seattle to West Seattle's Alaska Junction area and to Ballard's Market Street area in Seattle, King County, Washington. FTA and Sound Transit will prepare the EIS in accordance with National Environmental Policy Act (NEPA) and Washington State Environmental Policy Act (SEPA). FTA is the lead agency under NEPA and Sound Transit is the lead agency under the SEPA.

As the SEPA lead agency, Sound Transit is sending the attached SEPA Determination of Significance (DS). The DS includes information on the project and the scoping comment period that extends to March 18<sup>th</sup>. Your agency will also be receiving a letter from FTA inviting you to participate in the environmental review process.

The FTA letter will include an invitation to attend an agency scoping meeting on March 5<sup>th</sup> from 1:00 – 3:00 p.m. PST. The meeting will be held in the Sound Transit Sante Fe Room located at Union Station, 401 South Jackson Street, Seattle, WA 98104. You can also participate online through GoToWebinar. To participate online, please register before the meeting at: <a href="http://bit.ly/WSBscoping">http://bit.ly/WSBscoping</a>. After registering, you will receive a confirmation email containing information about joining the webinar and the option to add an Outlook appointment to your calendar.

More information on the Project is available on Sound Transit's website at: <a href="https://www.soundtransit.org/WSBLink">www.soundtransit.org/WSBLink</a>. Please contact me or Mark Assam at FTA (206-220-4465; <a href="mark.Assam@dot.gov">Mark.Assam@dot.gov</a>) if you have any questions.

Thank you, Erin

#### Erin Green

Senior Environmental Planner Environmental Affairs and Sustainability Sound Transit (206) 398-5464

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REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 25, 2019

The Honorable Virginia Cross Chairwoman Muckleshoot Indian Tribe 39015 172nd Avenue Southeast Auburn, WA 98092

RE: Sound Transit West Seattle and Ballard Link Extensions Project Invitation to Participate in the Environmental Review Process and Initiation of Section 106 Consultation

Dear Chairwoman Cross:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). FTA will be the lead agency under NEPA, and Sound Transit will be the lead agency under SEPA. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106 of the National Historic Preservation Act [36 Code of Federal Regulations (CFR) Part 800]. FTA previously initiated government-to-government consultation on the WSBLE Project with the Muckleshoot Indian Tribe in a letter dated February 2, 2018.

## **Project Description**

In 2016, voters in the Puget Sound region approved financing for the Sound Transit 3 (ST3) Plan of regional transit system investments. The ST3 Plan included representative projects depicting light rail transit extensions from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. The WSBLE Project was developed from the representative projects contained in the ST3 Plan, and accordingly would expand Link light rail service from downtown Seattle to West Seattle and to Ballard. The Project corridor is approximately 11.8 miles long and includes fourteen stations that serve the following areas in Seattle: Alaska Junction, Avalon, Delridge, SODO, the sports stadiums, International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard. The Project would provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

Additional Project information, including the Sound Transit Determination of Significance under SEPA and a Scoping Information Report that provides a map of potential alternatives, possible topics to be evaluated in the EIS, and a preliminary purpose and need statement, is available on Sound Transit's website at <a href="https://www.soundtransit.org/WSBLink">www.soundtransit.org/WSBLink</a>.

## **Initiation of Section 106 Consultation**

To ensure that we account for any effects of this undertaking on properties listed in or eligible for listing in the National Register of Historic Places, FTA is now also initiating formal Section 106 consultation pursuant to 36 CFR Part 800.2(a)(4).

## **Invitation to Participate in the Environmental Review Process**

23 U.S. Code (USC) Section 139, as amended by section 1304 of the Fixing America's Surface Transportation (FAST) Act, enhances the environmental review process for certain FTA projects, including this one, providing more transparency and defining opportunities for participation. Therefore, the lead agencies must identify any other Federal, State, local or federally-recognized Indian Tribal government that may have an interest in the Project and invite them to become participating or cooperating agencies in the environmental review process.

We have preliminarily identified the Muckleshoot Indian Tribe as potentially interested in the WSBLE Project and invite you to become actively involved as a participating agency in the environmental review process.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially in regard to the development of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail for the analysis of impacts.
- Identify, as early as practicable, any issues of concern regarding the Project's potential impacts.
- Provide meaningful and timely input on unresolved issues.
- Participate in the EIS scoping process.
- Concur with the schedule in the Agency and Tribal Coordination Plan.

You do not have to accept this invitation. If, however, you elect not to become a participating agency we request that you decline this invitation in writing pursuant to 23 USC Section 139(d)(3). In order to give agencies and tribes adequate opportunity to weigh the relevance of their participation in this environmental review process, written responses to this invitation are not requested until the close of the scoping process. **Please use the attached Agency Designation form to accept or decline this invitation by March 18, 2019.** Your tribe will be treated as a participating agency unless we receive your written response declining such a designation as outlined above by March 18, 2019.

To guide agency and tribal review during the environmental process, FTA and Sound Transit will prepare an Agency and Tribal Coordination Plan in accordance with 23 USC Section 139(g)(1). The objective of the plan is to identify key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. If you elect to become a participating agency, we will send you the Agency and Tribal Coordination Plan and seek your concurrence with the schedule pursuant to 23 USC Section 139(g)(1)(B).

## **Alternatives Development and Scoping**

Sound Transit previously conducted an "early scoping" process under SEPA to develop an initial range of potential alternatives between February 2 through March 5, 2018. The Early Scoping Summary Report describes the early scoping process and provides a summary of the comments that were received. We appreciate the feedback we received from your staff during the early scoping process. The report can be accessed on Sound Transit's website at: <a href="https://www.soundtransit.org/get-to-know-us/documents-reports/west-seattle-ballard-link-extensions-early-scoping-summary-report">https://www.soundtransit.org/get-to-know-us/documents-reports/west-seattle-ballard-link-extensions-early-scoping-summary-report</a>.

FTA and Sound Transit will conduct the EIS scoping process under NEPA and SEPA from February 15 to March 18, 2019. We are requesting scoping comments on the Project's preliminary purpose and need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be studied in the EIS. We appreciate receiving your comments by March 18, 2019.

FTA and Sound Transit invite you or a delegate to attend the agency and tribe scoping meeting on March 5, 2019 at Sound Transit's Santa Fe Room, Union Station, 401 South Jackson Street, Seattle, Washington 98104 from 1:00 to 3:00 pm. If you are unable to attend in person, you can participate online through GoToWebinar. To participate online please register before the meeting at: <a href="http://bit.ly/WSBscoping">http://bit.ly/WSBscoping</a>. After registering, you will receive a confirmation email containing information about joining the webinar.

Please do not hesitate to contact me directly at 206-220-7957 or <a href="linda.gehrke@dot.gov">linda.gehrke@dot.gov</a> if you have any questions or concerns. You may also contact Mark Assam, of my staff, at 206-220-4465 or <a href="mark.assam@dot.gov">mark.assam@dot.gov</a>. Erin Green with Sound Transit will be reaching out to your staff to continue discussions on this project. Erin can be reached at 206-398-5464 or <a href="mark.assam@soundtransit.org">erin.green@soundtransit.org</a>. We look forward to continuing to work with you on this project.

## Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2019.02.25 10:42:31 -08'00' Linda M. Gehrke Regional Administrator

cc: Karen Walter, Muckleshoot Indian Tribe Glen St. Amant, Muckleshoot Indian Tribe Laura Murphy, Muckleshoot Indian Tribe Dennis Wardlaw, DAHP Erin Green, Sound Transit

Enclosures: Participating Agency Designation Form

# WEST SEATTLE AND BALLARD LINK EXTENSIONS PROJECT PARTICIPATING AGENCY DESIGNATION

Yes, the Muckleshoot Indian Tribe wishes to be designated as a participating agency for the proposed West Seattle and Ballard Link Extensions (WSBLE) Project.	
No, the Muckleshoot Indian Tribe does not wish to be designated as a participating agency for the WSBLE Project.	
	(Sign – Authorized Representative)
	(Print)
	(Title)
	(Date)

Please return by March 18, 2019 to:

Mark Assam
Federal Transit Administration, Region 10
915 Second Ave., Suite 3142
Seattle, WA 98174

Phone: (206) 220-4465 Fax: (206) 220-7518



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 25, 2019

The Honorable Robert de los Angeles Chairman Snoqualmie Indian Tribe P O Box 969 Snoqualmie, WA 98065

RE: Sound Transit West Seattle and Ballard Link Extensions Project Invitation to Participate in the Environmental Review Process and Initiation of Section 106 Consultation

Dear Chairman de los Angeles:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). FTA will be the lead agency under NEPA, and Sound Transit will be the lead agency under SEPA. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106 of the National Historic Preservation Act [36 Code of Federal Regulations (CFR) Part 800]. FTA previously initiated government-to-government consultation on the WSBLE Project with the Snoqualmie Indian Tribe in a letter dated February 2, 2018.

### **Project Description**

In 2016, voters in the Puget Sound region approved financing for the Sound Transit 3 (ST3) Plan of regional transit system investments. The ST3 Plan included representative projects depicting light rail transit extensions from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. The WSBLE Project was developed from the representative projects contained in the ST3 Plan, and accordingly would expand Link light rail service from downtown Seattle to West Seattle and to Ballard. The Project corridor is approximately 11.8 miles long and includes fourteen stations that serve the following areas in Seattle: Alaska Junction, Avalon, Delridge, SODO, the sports stadiums, International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard. The Project would provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

Additional Project information, including the Sound Transit Determination of Significance under SEPA and a Scoping Information Report that provides a map of potential alternatives, possible topics to be evaluated in the EIS, and a preliminary purpose and need statement, is available on Sound Transit's website at <a href="https://www.soundtransit.org/WSBLink">www.soundtransit.org/WSBLink</a>.

### **Initiation of Section 106 Consultation**

To ensure that we account for any effects of this undertaking on properties listed in or eligible for listing in the National Register of Historic Places, FTA is now also initiating formal Section 106 consultation pursuant to 36 CFR Part 800.2(a)(4).

### **Invitation to Participate in the Environmental Review Process**

23 U.S. Code (USC) Section 139, as amended by section 1304 of the Fixing America's Surface Transportation (FAST) Act, enhances the environmental review process for certain FTA projects, including this one, providing more transparency and defining opportunities for participation. Therefore, the lead agencies must identify any other Federal, State, local or federally-recognized Indian Tribal government that may have an interest in the Project and invite them to become participating or cooperating agencies in the environmental review process.

We have preliminarily identified the Snoqualmie Indian Tribe as potentially interested in the WSBLE Project and invite you to become actively involved as a participating agency in the environmental review process.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially in regard to the development of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail for the analysis of impacts.
- Identify, as early as practicable, any issues of concern regarding the Project's potential impacts.
- Provide meaningful and timely input on unresolved issues.
- Participate in the EIS scoping process.
- Concur with the schedule in the Agency and Tribal Coordination Plan.

You do not have to accept this invitation. If, however, you elect not to become a participating agency we request that you decline this invitation in writing pursuant to 23 USC Section 139(d)(3). In order to give agencies and tribes adequate opportunity to weigh the relevance of their participation in this environmental review process, written responses to this invitation are not requested until the close of the scoping process. **Please use the attached Agency Designation form to accept or decline this invitation by March 18, 2019.** Your tribe will be treated as a participating agency unless we receive your written response declining such a designation as outlined above by March 18, 2019.

To guide agency and tribal review during the environmental process, FTA and Sound Transit will prepare an Agency and Tribal Coordination Plan in accordance with 23 USC Section 139(g)(1). The objective of the plan is to identify key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. If you elect to become a participating agency, we will send you the Agency and Tribal Coordination Plan and seek your concurrence with the schedule pursuant to 23 USC Section 139(g)(1)(B).

### **Alternatives Development and Scoping**

Sound Transit previously conducted an "early scoping" process under SEPA to develop an initial range of potential alternatives between February 2 through March 5, 2018. The Early Scoping Summary Report describes the early scoping process and provides a summary of the comments that were received. The report can be accessed on Sound Transit's website at: <a href="https://www.soundtransit.org/get-to-know-us/documents-reports/west-seattle-ballard-link-extensions-early-scoping-summary-report">https://www.soundtransit.org/get-to-know-us/documents-reports/west-seattle-ballard-link-extensions-early-scoping-summary-report</a>.

FTA and Sound Transit will conduct the EIS scoping process under NEPA and SEPA from February 15 to March 18, 2019. We are requesting scoping comments on the Project's preliminary purpose and need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be studied in the EIS. We appreciate receiving your comments by March 18, 2019.

FTA and Sound Transit invite you or a delegate to attend the agency and tribe scoping meeting on March 5, 2019 at Sound Transit's Santa Fe Room, Union Station, 401 South Jackson Street, Seattle, Washington 98104 from 1:00 to 3:00 pm. If you are unable to attend in person, you can participate online through GoToWebinar. To participate online please register before the meeting at: <a href="http://bit.ly/WSBscoping">http://bit.ly/WSBscoping</a>. After registering, you will receive a confirmation email containing information about joining the webinar.

Please do not hesitate to contact me directly at 206-220-7957 or <a href="linda.gehrke@dot.gov">linda.gehrke@dot.gov</a> if you have any questions or concerns. You may also contact Mark Assam, of my staff, at 206-220-4465 or <a href="mark.assam@dot.gov">mark.assam@dot.gov</a>. Erin Green with Sound Transit will be reaching out to your staff to continue discussions on this project. Erin can be reached at 206-398-5464 or <a href="mark.assam@soundtransit.org">erin.green@soundtransit.org</a>. We look forward to continuing to work with you on this project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

Date: 2019.02.25
10:44:53 -08:00'

Linda M. Gehrke Regional Administrator

cc: Steven Mullen-Moses, Snoqualmie Indian Tribe Cindy Spiry, Snoqualmie Indian Tribe

> Dennis Wardlaw, DAHP Erin Green, Sound Transit

Enclosures: Participating Agency Designation Form

# WEST SEATTLE AND BALLARD LINK EXTENSIONS PROJECT PARTICIPATING AGENCY DESIGNATION

	Yes, the Snoqualmie Indian Tribe wishes to proposed West Seattle and Ballard Link Ext	be designated as a participating agency for the tensions (WSBLE) Project.
No, the Snoqualmie Indian Tribe does not wish to be designated as a participating a WSBLE Project.		vish to be designated as a participating agency for the
		(Sign – Authorized Representative)
		(Print)
		(Title)
		(Date)

Please return by March 18, 2019 to:

Mark Assam
Federal Transit Administration, Region 10
915 Second Ave., Suite 3142
Seattle, WA 98174

Phone: (206) 220-4465 Fax: (206) 220-7518



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 25, 2019

The Honorable Shawn Yanity Chairman Stillaguamish Tribe of Indians of Washington PO Box 277 Arlington, WA 98223-0277

RE: Sound Transit West Seattle and Ballard Link Extensions Project Invitation to Participate in the Environmental Review Process and Initiation of Section 106 Consultation

Dear Chairman Yanity:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). FTA will be the lead agency under NEPA, and Sound Transit will be the lead agency under SEPA. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106 of the National Historic Preservation Act [36 Code of Federal Regulations (CFR) Part 800]. FTA previously initiated government-to-government consultation on the WSBLE Project with the Stillaguamish Tribe of Indians of Washington in a letter dated February 2, 2018.

### **Project Description**

In 2016, voters in the Puget Sound region approved financing for the Sound Transit 3 (ST3) Plan of regional transit system investments. The ST3 Plan included representative projects depicting light rail transit extensions from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. The WSBLE Project was developed from the representative projects contained in the ST3 Plan, and accordingly would expand Link light rail service from downtown Seattle to West Seattle and to Ballard. The Project corridor is approximately 11.8 miles long and includes fourteen stations that serve the following areas in Seattle: Alaska Junction, Avalon, Delridge, SODO, the sports stadiums, International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard. The Project would provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

Additional Project information, including the Sound Transit Determination of Significance under SEPA and a Scoping Information Report that provides a map of potential alternatives, possible topics to be evaluated in the EIS, and a preliminary purpose and need statement, is available on Sound Transit's website at <a href="https://www.soundtransit.org/WSBLink">www.soundtransit.org/WSBLink</a>.

### **Initiation of Section 106 Consultation**

To ensure that we account for any effects of this undertaking on properties listed in or eligible for listing in the National Register of Historic Places, FTA is now also initiating formal Section 106 consultation pursuant to 36 CFR Part 800.2(a)(4).

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We have preliminarily identified the Stillaguamish Tribe of Indians of Washington as potentially interested in the WSBLE Project and invite you to become actively involved as a participating agency in the environmental review process.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially in regard to the development of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail for the analysis of impacts.
- Identify, as early as practicable, any issues of concern regarding the Project's potential impacts.
- Provide meaningful and timely input on unresolved issues.
- Participate in the EIS scoping process.
- Concur with the schedule in the Agency and Tribal Coordination Plan.

You do not have to accept this invitation. If, however, you elect not to become a participating agency we request that you decline this invitation in writing pursuant to 23 USC Section 139(d)(3). In order to give agencies and tribes adequate opportunity to weigh the relevance of their participation in this environmental review process, written responses to this invitation are not requested until the close of the scoping process. **Please use the attached Agency Designation form to accept or decline this invitation by March 18, 2019.** Your tribe will be treated as a participating agency unless we receive your written response declining such a designation as outlined above by March 18, 2019.

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### **Alternatives Development and Scoping**

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FTA and Sound Transit invite you or a delegate to attend the agency and tribe scoping meeting on March 5, 2019 at Sound Transit's Santa Fe Room, Union Station, 401 South Jackson Street, Seattle, Washington 98104 from 1:00 to 3:00 pm. If you are unable to attend in person, you can participate online through GoToWebinar. To participate online please register before the meeting at: <a href="http://bit.ly/WSBscoping">http://bit.ly/WSBscoping</a>. After registering, you will receive a confirmation email containing information about joining the webinar.

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Sincerely,

LINDA M

Digitally signed by LINDA M GEHRKE

Date: 2019.02.25
14:20:53-08'00'

Linda M. Gehrke Regional Administrator

cc: Kerry Lyste, Stillaguamish Tribe of Indians of Washington Pat Stevenson, Stillaguamish Tribe of Indians of Washington Dennis Wardlaw, DAHP

Erin Green, Sound Transit

Enclosures: Participating Agency Designation Form

# WEST SEATTLE AND BALLARD LINK EXTENSIONS PROJECT PARTICIPATING AGENCY DESIGNATION

Yes, the Stillaguamish Tribe of Indians of Washin agency for the proposed West Seattle and Ballard	
No, the Stillaguamish Tribe of Indians of Washington does not wish to be designated as a participating agency for the WSBLE Project.	
(Si	gn – Authorized Representative)
(Pr	int)
(Ti	tle)
(Da	ate)

Please return by March 18, 2019 to:

Mark Assam
Federal Transit Administration, Region 10
915 Second Ave., Suite 3142
Seattle, WA 98174

Phone: (206) 220-4465 Fax: (206) 220-7518



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 25, 2019

The Honorable Leonard Forsman Chairman Suquamish Indian Tribe of the Port Madison Reservation PO Box 498 Suquamish, WA 98392-0498

RE: Sound Transit West Seattle and Ballard Link Extensions Project Invitation to Participate in the Environmental Review Process and Initiation of Section 106 Consultation

Dear Chairman Forsman:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). FTA will be the lead agency under NEPA, and Sound Transit will be the lead agency under SEPA. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106 of the National Historic Preservation Act [36 Code of Federal Regulations (CFR) Part 800]. FTA previously initiated government-to-government consultation on the WSBLE Project with the Suquamish Indian Tribe of the Port Madison Reservation in a letter dated February 2, 2018.

### **Project Description**

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We have preliminarily identified the Suquamish Indian Tribe of the Port Madison Reservation as potentially interested in the WSBLE Project and invite you to become actively involved as a participating agency in the environmental review process.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially in regard to the development of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail for the analysis of impacts.
- Identify, as early as practicable, any issues of concern regarding the Project's potential impacts.
- Provide meaningful and timely input on unresolved issues.
- Participate in the EIS scoping process.
- Concur with the schedule in the Agency and Tribal Coordination Plan.

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To guide agency and tribal review during the environmental process, FTA and Sound Transit will prepare an Agency and Tribal Coordination Plan in accordance with 23 USC Section 139(g)(1). The objective of the plan is to identify key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. If you elect to become a participating agency, we will send you the Agency and Tribal Coordination Plan and seek your concurrence with the schedule pursuant to 23 USC Section 139(g)(1)(B).

### **Alternatives Development and Scoping**

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Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2019.02.25 10:53:48 -08'00'

Linda M. Gehrke Regional Administrator

cc: Alison O'Sullivan, Suquamish Indian Tribe of the Port Madison Reservation Rich Brooks, Suquamish Indian Tribe of the Port Madison Reservation Dennis Lewarch, Suquamish Indian Tribe of the Port Madison Reservation Dennis Wardlaw, DAHP Erin Green, Sound Transit

Enclosures: Participating Agency Designation Form

# WEST SEATTLE AND BALLARD LINK EXTENSIONS PROJECT PARTICIPATING AGENCY DESIGNATION

Yes, the Suquamish Indian Tribe of the Port N participating agency for the proposed West So Project.	Madison Reservation wishes to be designated as a eattle and Ballard Link Extensions (WSBLE)
No, the Suquamish Indian Tribe of the Port Mas a participating agency for the WSBLE Proj	ladison Reservation does not wish to be designated lect.
	_(Sign – Authorized Representative)
	_(Print)
	_(Title)
	_(Date)

Please return by March 18, 2019 to:

Mark Assam Federal Transit Administration, Region 10 915 Second Ave., Suite 3142 Seattle, WA 98174 Phone: (206) 220-4465

Fax: (206) 220-7518



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 25, 2019

The Honorable Marie Zackuse Chairwoman Tulalip Tribes of Washington 6406 Marine Drive Northwest Tulalip, WA 98271

RE: Sound Transit West Seattle and Ballard Link Extensions Project Invitation to Participate in the Environmental Review Process and Initiation of Section 106 Consultation

Dear Chairwoman Zackuse:

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Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2019.02.25
10:58:04-08'00'

Linda M. Gehrke Regional Administrator

cc: Kurt Nelson, Tulalip Tribes of Washington Richard Young, Tulalip Tribes of Washington Dennis Wardlaw, DAHP Erin Green, Sound Transit

Enclosures: Participating Agency Designation Form

# WEST SEATTLE AND BALLARD LINK EXTENSIONS PROJECT PARTICIPATING AGENCY DESIGNATION

Yes, the Tulalip Tribes of Washington wishes to be design proposed West Seattle and Ballard Link Extensions (WSF)	1 1 0 0 .
No, the Tulalip Tribes of Washington does not wish to be designated as a participating agriculture for the WSBLE Project.	
(Sign – Au	thorized Representative)
(Print)	
(Title)	
(Date)	

Please return by March 18, 2019 to:

Mark Assam
Federal Transit Administration, Region 10
915 Second Ave., Suite 3142
Seattle, WA 98174

Phone: (206) 220-4465 Fax: (206) 220-7518



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 25, 2019

The Honorable JoDe Goudy Chairman Confederated Tribes and Bands of the Yakama Nation PO BOX 151 Toppenish, WA 98948

RE: Sound Transit West Seattle and Ballard Link Extensions Project Invitation to Participate in the Environmental Review Process and Initiation of Section 106 Consultation

Dear Chairman Goudy:

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Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2019.02.25
11:00:19-08'00'

Linda M. Gehrke

Regional Administrator

cc: Philip Rigdon, Confederated Tribes and Bands of the Yakama Nation Johnson Meninick, Confederated Tribes and Bands of the Yakama Nation Dennis Wardlaw, DAHP Erin Green, Sound Transit

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Mark Assam Federal Transit Administration, Region 10 915 Second Ave., Suite 3142 Seattle, WA 98174 Phone: (206) 220-4465

Fax: (206) 220-7518



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 25, 2019

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

RE: Sound Transit West Seattle and Ballard Link Extensions Project Invitation to Participate in the Environmental Review Process, & Initiation of Section 106 Consultation

Dear Dr. Brooks:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is initiating the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA). The EIS will be a combined document under NEPA and the Washington State Environmental Policy Act (SEPA). FTA will be the lead agency under NEPA, and Sound Transit will be the lead agency under SEPA. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to Section 106 of the National Historic Preservation Act [36 Code of Federal Regulations (CFR) Part 800].

### **Project Description**

In 2016, voters in the Puget Sound region approved financing for the Sound Transit 3 (ST3) Plan of regional transit system investments. The ST3 Plan included representative projects depicting light rail transit extensions from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. The WSBLE Project was developed from the representative projects contained in the ST3 Plan, and accordingly would expand Link light rail service from downtown Seattle to West Seattle and to Ballard. The Project corridor is approximately 11.8 miles long and includes fourteen stations that serve the following areas in Seattle: Alaska Junction, Avalon, Delridge, SODO, the sports stadiums, International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard. The Project would provide a dependable and efficient connection along the corridor and respond to a growing number of transportation and community needs.

Additional Project information, including the Sound Transit Determination of Significance under SEPA and a Scoping Information Report that provides a map of potential alternatives, possible topics to be evaluated in the EIS, and a preliminary purpose and need statement, is available on Sound Transit's website at <a href="https://www.soundtransit.org/WSBLink">www.soundtransit.org/WSBLink</a>.

#### **Initiation of Section 106 Consultation**

To ensure that we account for any effects of this undertaking on properties listed in or eligible for listing in the National Register of Historic Places, FTA is initiating Section 106 consultation pursuant to 36 CFR Part 800.2(a)(4).

### **Invitation to Participate in the Environmental Review Process**

23 U.S. Code (USC) Section 139, as amended by section 1304 of the Fixing America's Surface Transportation (FAST) Act, enhances the environmental review process for certain FTA projects, including this one, providing more transparency and defining opportunities for participation. Therefore, the lead agencies must identify any other agencies that may have an interest in the Project and invite them to become participating or cooperating agencies in the environmental review process.

We have preliminarily identified the Washington Department of Archaeology and Historic Preservation (DAHP) as an agency that may be interested in the WSBLE Project because of potential effects to historic and archaeological resources. Accordingly, we invite DAHP to become actively involved as a participating agency in the environmental review process.

As a participating agency, you will be asked to:

- Participate in the NEPA process starting at the earliest possible time, especially in regard to the development of the purpose and need statement, range of alternatives, EIS analysis methodologies, and the level of detail for the analysis of impacts.
- Identify, as early as practicable, any issues of concern regarding the Project's potential impacts.
- Provide meaningful and timely input on unresolved issues.
- Participate in the EIS scoping process.
- Concur with the schedule in the Agency and Tribal Coordination Plan.

Your agency does not have to accept this invitation. If, however, you elect not to become a participating agency you must decline this invitation in writing, indicating that your agency has no jurisdiction or authority with respect to the Project, no expertise or information relevant to the Project, and does not intend to submit comments on the Project pursuant to 23 USC Section 139(d)(3).

In order to give agencies adequate opportunity to weigh the relevance of their participation in this environmental review process, written responses to this invitation are not due until the close of the scoping process. Please use the attached Agency Designation form to accept or decline this invitation by March 18, 2019. Your agency will be treated as a participating agency unless we receive your written response declining such a designation as outlined above by March 18, 2019.

FTA and Sound Transit will prepare an Agency and Tribal Coordination Plan in accordance with 23 USC Section 139(g)(1) with the objective of identifying key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. If you elect

to become a participating agency, we will send you the Agency and Tribal Coordination Plan and seek your concurrence with the schedule pursuant to 23 USC Section 139(g)(1)(B).

### **Scoping**

Sound Transit previously conducted "early scoping" under SEPA for the alternatives development phase of the Project from February 2 through March 5, 2018. The Early Scoping Summary Report describes the early scoping process and provides a summary of the comments that were received. The report can be accessed on Sound Transit's website at: <a href="https://www.soundtransit.org/get-to-know-us/documents-reports/west-seattle-ballard-link-extensions-early-scoping-summary-report.">https://www.soundtransit.org/get-to-know-us/documents-reports/west-seattle-ballard-link-extensions-early-scoping-summary-report.</a>

FTA and Sound Transit invite you or a delegate to attend the agency and tribe scoping meeting on March 5, 2019 at Sound Transit's Santa Fe Room, Union Station, 401 South Jackson Street, Seattle, Washington 98104 from 1:00 to 3:00 pm. If you are unable to attend in person, you can participate online through GoToWebinar. To participate online please register before the meeting at: <a href="http://bit.ly/WSBscoping">http://bit.ly/WSBscoping</a>. After registering, you will receive a confirmation email containing information about joining the webinar.

The scoping period will extend to March 18, 2019. Scoping comments are requested on the Project's preliminary purpose and need statement, proposed range of alternatives, the probable significant impacts, and detail of analysis on specific environmental impacts to be included in the EIS.

We appreciate all of your coordination on the Project during the local planning process and look forward to continuing to work with you. If you have any questions or would like to discuss our agencies' respective roles and responsibilities during the preparation of the EIS, please contact Mark Assam at FTA (206-220-4465 or <a href="mark.assam@dot.gov">mark.assam@dot.gov</a>) or Lauren Swift at Sound Transit (206-398-5301 or <a href="mark.assam@dot.gov">lauren.swift@soundtransit.org</a>).

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2019.02.25
11:02:33-08'00'

Linda M. Gehrke

Regional Administrator

cc: Dennis Wardlaw, DAHP Holly Borth, DAHP Lauren Swift, Sound Transit

Enclosures: Participating Agency Designation Form

### WEST SEATTLE AND BALLARD LINK EXTENSIONS PROJECT PARTICIPATING AGENCY DESIGNATION

Yes, the Washington Department of Archaeology and Historic Preservation wishes to be designated as a participating agency.	
No, the Washington Department of Archaeology and Historic Preservation does not wish designated as a participating agency because:	
☐Agency has no jurisdiction or authority with respect to the Project	
☐ Agency has no expertise or information relevant to the Project	
☐Agency does not intend to submit comments on the Project	
 (Sign – Authorized Representative)	
 (Print)	
 (Title)	
(Date)	

Please return by March 18, 2019 to:

Mark Assam
Federal Transit Administration, Region 10
915 Second Ave., Suite 3142
Seattle, WA 98174
Physical Action

Phone: (206) 220-4465 Fax: (206) 220-7518 From: "Wardlaw, Dennis (DAHP)" < <a href="mailto:dennis.wardlaw@dahp.wa.gov">dennis.wardlaw@dahp.wa.gov</a>

Date: March 5, 2019 at 3:06:04 PM PST

**To:** "Assam, Mark (FTA)" < <u>Mark.Assam@dot.gov</u>> **Cc:** "Swift, Lauren" < <u>lauren.swift@soundtransit.org</u>>

Subject: King County\_ West Seattle To Ballard Light Rail Extension (2019-03-01457)

Hi Mark,

Good afternoon. Attached is our signed participating agency designation sheet for the West Seattle to Ballard Light Rail Extension Project. Please let me know if you have any questions.

Regards, Dennis

Dennis Wardlaw, M.A.
Transportation Archaeologist
Dept. of Archaeology and Historic Preservation
1110 Capitol Way South, Suite 30
Olympia, WA 98501

Voice: 360-586-3085 Cell: 360-485-5014

please consider the environment before printing this email

### WEST SEATTLE AND BALLARD LINK EXTENSIONS PROJECT PARTICIPATING AGENCY DESIGNATION

<b>D</b>	Yes, the Washington Department of Archaeology and Historic Preservation wishes to be designated as a participating agency.
	No, the Washington Department of Archaeology and Historic Preservation does not wish to be designated as a participating agency because:
	Agency has no jurisdiction or authority with respect to the Project
	☐Agency has no expertise or information relevant to the Project
	☐Agency does not intend to submit comments on the Project
L	(Sign – Authorized Representative)
	(Print)
	(Title)
	(Date)

Please return by March 18, 2019 to:

Mark Assam
Federal Transit Administration, Region 10
915 Second Ave., Suite 3142
Seattle, WA 98174
Phone: (206) 220-4465
Fax: (206) 220-7518



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 10, 2019

The Honorable Jaison Elkins Chairman Muckleshoot Indian Tribe 39015 172nd Avenue Southeast Auburn, WA 98092

**Subject:** Sound Transit

West Seattle and Ballard Link Extensions Project Agency Coordination Plan and Request for Concurrence with Project Schedule

#### Dear Chairman Elkins:

The Federal Transit Administration (FTA) and Sound Transit initiated the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA) in February 2019. FTA invited the Muckleshoot Indian Tribe to participate in the environmental review process as a participating agency. Since FTA did not receive a response, the Muckleshoot Indian Tribe will be included as a participating agency.

In accordance with 23 United States Code (USC) Section 139(g)(1), FTA and Sound Transit have prepared the enclosed Agency and Tribal Coordination Plan. The objective of the Agency and Tribal Coordination Plan is to identify key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. The Agency and Tribal Coordination Plan includes a schedule in Section 5.4, Agency and Tribal Coordination Milestone Schedule. Pursuant to 23 USC Section 139(g)(1)(B), FTA and Sound Transit request your concurrence with the proposed schedule within 30 days of receipt of this letter. If FTA does not receive a response from your agency within the above timeframe, we will assume that you concur with the schedule.

If you have any questions or would like to discuss any details of the Agency and Tribal Coordination Plan or schedule, please contact Mark Assam at FTA (206-220-4465;

May 10, 2019 Page 2

<u>mark.assam@dot.gov</u>) or Lauren Swift at Sound Transit (206-398-5301; <u>lauren.swift@soundtransit.org</u>). We look forward to working with you on the WSBLE Project.

### Sincerely,

JOHN A Digitally signed by JOHN A WITMER II Date: 2019.05.10 16:27:49 -07'00'

for Linda M. Gehrke Regional Administrator

> cc: Karen Walter, Muckleshoot Indian Tribe Glen St. Amant, Muckleshoot Indian Tribe Laura Murphy, Muckleshoot Indian Tribe Lauren Swift, Sound Transit

Enclosure: West Seattle and Ballard Link Extensions Agency and Tribal Coordination Plan,

May 2019



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 10, 2019

The Honorable Robert de los Angeles Chairman Snoqualmie Indian Tribe P O Box 969 Snoqualmie, WA 98065

**Subject:** Sound Transit

West Seattle and Ballard Link Extensions Project Agency Coordination Plan and Request for Concurrence with Project Schedule

Dear Chairman de los Angeles:

The Federal Transit Administration (FTA) and Sound Transit initiated the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA) in February 2019. FTA invited the Snoqualmie Indian Tribe to participate in the environmental review process as a participating agency. Since FTA did not receive a response, the Snoqualmie Indian Tribe will be included as a participating agency.

In accordance with 23 United States Code (USC) Section 139(g)(1), FTA and Sound Transit have prepared the enclosed Agency and Tribal Coordination Plan. The objective of the Agency and Tribal Coordination Plan is to identify key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. The Agency and Tribal Coordination Plan includes a schedule in Section 5.4, Agency and Tribal Coordination Milestone Schedule. Pursuant to 23 USC Section 139(g)(1)(B), FTA and Sound Transit request your concurrence with the proposed schedule within 30 days of receipt of this letter. If FTA does not receive a response from your agency within the above timeframe, we will assume that you concur with the schedule.

If you have any questions or would like to discuss any details of the Agency and Tribal Coordination Plan or schedule, please contact Mark Assam at FTA (206-220-4465;

May 10, 2019 Page 2

<u>mark.assam@dot.gov</u>) or Lauren Swift at Sound Transit (206-398-5301; <u>lauren.swift@soundtransit.org</u>). We look forward to working with you on the WSBLE Project.

Sincerely,

for Linda M. Gehrke Regional Administrator

> cc: Cindy Spiry, Snoqualmie Indian Tribe Steven Mullen-Moses, Snoqualmie Indian Tribe Lauren Swift, Sound Transit

Enclosure: West Seattle and Ballard Link Extensions Agency and Tribal Coordination Plan,

May 2019



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 10, 2019

The Honorable Shawn Yanity Chairman Stillaguamish Tribe of Indians of Washington PO Box 277 Arlington, WA 98223-0277

**Subject:** Sound Transit

West Seattle and Ballard Link Extensions Project Agency Coordination Plan and Request for Concurrence with Project Schedule

Dear Chairman Yanity:

The Federal Transit Administration (FTA) and Sound Transit initiated the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA) in February 2019. FTA invited the Stillaguamish Tribe of Indians of Washington to participate in the environmental review process as a participating agency. Since FTA did not receive a response, the Stillaguamish Tribe of Indians of Washington will be included as a participating agency.

In accordance with 23 United States Code (USC) Section 139(g)(1), FTA and Sound Transit have prepared the enclosed Agency and Tribal Coordination Plan. The objective of the Agency and Tribal Coordination Plan is to identify key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. The Agency and Tribal Coordination Plan includes a schedule in Section 5.4, Agency and Tribal Coordination Milestone Schedule. Pursuant to 23 USC Section 139(g)(1)(B), FTA and Sound Transit request your concurrence with the proposed schedule within 30 days of receipt of this letter. If FTA does not receive a response from your agency within the above timeframe, we will assume that you concur with the schedule.

If you have any questions or would like to discuss any details of the Agency and Tribal Coordination Plan or schedule, please contact Mark Assam at FTA (206-220-4465;

May 10, 2019 Page 2

<u>mark.assam@dot.gov</u>) or Lauren Swift at Sound Transit (206-398-5301; <u>lauren.swift@soundtransit.org</u>). We look forward to working with you on the WSBLE Project.

Sincerely,

JOHN A

Digitally signed by JOHN A WITMER II

Date: 2019.05.10
16:37:16 -07'00'

for Linda M. Gehrke Regional Administrator

> cc: Kerry Lyste, Stillaguamish Tribe of Indians of Washington Pat Stevenson, Stillaguamish Tribe of Indians of Washington Lauren Swift, Sound Transit

Enclosure: West Seattle and Ballard Link Extensions Agency and Tribal Coordination Plan, May 2019



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 10, 2019

The Honorable Leonard Forsman Chairman Suquamish Indian Tribe of the Port Madison Reservation PO Box 498 Suquamish, WA 98392-0498

**Subject:** Sound Transit

West Seattle and Ballard Link Extensions Project Agency Coordination Plan and Request for Concurrence with Project Schedule

#### Dear Chairman Forsman:

The Federal Transit Administration (FTA) and Sound Transit initiated the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA) in February 2019. FTA invited the Suquamish Indian Tribe of the Port Madison Reservation to participate in the environmental review process as a participating agency. Since FTA did not receive a response, the Suquamish Indian Tribe of the Port Madison Reservation will be included as a participating agency.

In accordance with 23 United States Code (USC) Section 139(g)(1), FTA and Sound Transit have prepared the enclosed Agency and Tribal Coordination Plan. The objective of the Agency and Tribal Coordination Plan is to identify key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. The Agency and Tribal Coordination Plan includes a schedule in Section 5.4, Agency and Tribal Coordination Milestone Schedule. Pursuant to 23 USC Section 139(g)(1)(B), FTA and Sound Transit request your concurrence with the proposed schedule within 30 days of receipt of this letter. If FTA does not receive a response from your agency within the above timeframe, we will assume that you concur with the schedule.

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May 10, 2019 Page 2

<u>mark.assam@dot.gov</u>) or Lauren Swift at Sound Transit (206-398-5301; <u>lauren.swift@soundtransit.org</u>). We look forward to working with you on the WSBLE Project.

### Sincerely,

JOHN A

Digitally signed by JOHN A WITMER II

Date: 2019.05.10
16:39:33 -07'00'

for Linda M. Gehrke Regional Administrator

> cc: Alison O'Sullivan, Suquamish Indian Tribe of the Port Madison Reservation Rich Brooks, Suquamish Indian Tribe of the Port Madison Reservation Dennis Lewarch, Suquamish Indian Tribe of the Port Madison Reservation Lauren Swift, Sound Transit

Enclosure: West Seattle and Ballard Link Extensions Agency and Tribal Coordination Plan,

May 2019



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 10, 2019

The Honorable Marie Zackuse Chairwoman Tulalip Tribes of Washington 6406 Marine Drive Northwest Tulalip, WA 98271

**Subject:** Sound Transit

West Seattle and Ballard Link Extensions Project Agency Coordination Plan and Request for Concurrence with Project Schedule

Dear Chairwoman Zackuse:

The Federal Transit Administration (FTA) and Sound Transit initiated the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA) in February 2019. FTA invited the Tulalip Tribes of Washington to participate in the environmental review process as a participating agency. Since FTA did not receive a response, the Tulalip Tribes of Washington will be included as a participating agency.

In accordance with 23 United States Code (USC) Section 139(g)(1), FTA and Sound Transit have prepared the enclosed Agency and Tribal Coordination Plan. The objective of the Agency and Tribal Coordination Plan is to identify key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. The Agency and Tribal Coordination Plan includes a schedule in Section 5.4, Agency and Tribal Coordination Milestone Schedule. Pursuant to 23 USC Section 139(g)(1)(B), FTA and Sound Transit request your concurrence with the proposed schedule within 30 days of receipt of this letter. If FTA does not receive a response from your agency within the above timeframe, we will assume that you concur with the schedule.

If you have any questions or would like to discuss any details of the Agency and Tribal Coordination Plan or schedule, please contact Mark Assam at FTA (206-220-4465;

May 10, 2019 Page 2

<u>mark.assam@dot.gov</u>) or Lauren Swift at Sound Transit (206-398-5301; <u>lauren.swift@soundtransit.org</u>). We look forward to working with you on the WSBLE Project.

Sincerely,

JOHN A

Digitally signed by JOHN A WITMER II

Date: 2019.05.10
16:41:36-07'00'

for Linda M. Gehrke Regional Administrator

> cc: Kurt Nelson, Tulalip Tribes of Washington Richard Young, Tulalip Tribes of Washington Lauren Swift, Sound Transit

Enclosure: West Seattle and Ballard Link Extensions Agency and Tribal Coordination Plan,

May 2019



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 10, 2019

The Honorable JoDe Goudy Chairman Confederated Tribes and Bands of the Yakama Nation PO BOX 151 Toppenish, WA 98948

**Subject:** Sound Transit

West Seattle and Ballard Link Extensions Project Agency Coordination Plan and Request for Concurrence with Project Schedule

Dear Chairman Goudy:

The Federal Transit Administration (FTA) and Sound Transit initiated the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA) in February 2019. FTA invited the Confederated Tribes and Bands of the Yakama Nation to participate in the environmental review process as a participating agency. Since FTA did not receive a response, the Confederated Tribes and Bands of the Yakama Nation will be included as a participating agency.

In accordance with 23 United States Code (USC) Section 139(g)(1), FTA and Sound Transit have prepared the enclosed Agency and Tribal Coordination Plan. The objective of the Agency and Tribal Coordination Plan is to identify key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. The Agency and Tribal Coordination Plan includes a schedule in Section 5.4, Agency and Tribal Coordination Milestone Schedule. Pursuant to 23 USC Section 139(g)(1)(B), FTA and Sound Transit request your concurrence with the proposed schedule within 30 days of receipt of this letter. If FTA does not receive a response from your agency within the above timeframe, we will assume that you concur with the schedule.

If you have any questions or would like to discuss any details of the Agency and Tribal Coordination Plan or schedule, please contact Mark Assam at FTA (206-220-4465;

May 10, 2019 Page 2

<u>mark.assam@dot.gov</u>) or Lauren Swift at Sound Transit (206-398-5301; <u>lauren.swift@soundtransit.org</u>). We look forward to working with you on the WSBLE Project.

Sincerely,

JOHN A Digitally signed by JOHN A WITMER II Date: 2019.05.10 16:48:14-07'00'

for Linda M. Gehrke Regional Administrator

> cc: Philip Rigdon, Confederated Tribes and Bands of the Yakama Nation Johnson Meninick, Confederated Tribes and Bands of the Yakama Nation Lauren Swift, Sound Transit

Enclosure: West Seattle and Ballard Link Extensions Agency and Tribal Coordination Plan, May 2019



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 10, 2019

Allyson Brooks State Historic Preservation Officer Washington Department of Archaeology and Historic Preservation PO Box 48343 Olympia, WA 98504-8343

**Subject:** Sound Transit

West Seattle and Ballard Link Extensions Project Agency Coordination Plan and Request for Concurrence with Project Schedule

Dear Dr. Brooks:

The Federal Transit Administration (FTA) and Sound Transit initiated the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA) in February 2019. FTA invited the Department of Archaeology and Historic Preservation to participate in the environmental review process as a participating agency. Thank you for your response accepting this invitation.

In accordance with 23 United States Code (USC) Section 139(g)(1), FTA and Sound Transit have prepared the enclosed Agency and Tribal Coordination Plan. The objective of the Agency and Tribal Coordination Plan is to identify key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. The Agency and Tribal Coordination Plan includes a schedule in Section 5.4, Agency and Tribal Coordination Milestone Schedule. Pursuant to 23 USC Section 139(g)(1)(B), FTA and Sound Transit request your concurrence with the proposed schedule within 30 days of receipt of this letter. If FTA does not receive a response from your agency within the above timeframe, we will assume that you concur with the schedule.

If you have any questions or would like to discuss any details of the Agency and Tribal Coordination Plan or schedule, please contact Mark Assam at FTA (206-220-4465;

May 10, 2019 Page 2

<u>mark.assam@dot.gov</u>) or Lauren Swift at Sound Transit (206-398-5301; <u>lauren.swift@soundtransit.org</u>). We look forward to working with you on the WSBLE Project.

Sincerely,

JOHN A Digitally signed by JOHN A WITMER II Date: 2019.05.10 16:15:52 -07'00'

for Linda M. Gehrke

Regional Administrator

cc: Lauren Swift, Sound Transit

Dennis Wardlaw, Department of Archaeology and Historic Preservation

Enclosure: West Seattle and Ballard Link Extensions Agency and Tribal Coordination Plan,

May 2019

From: Green, Erin

To: <u>Cecile@duwamishtribe.org</u>

Cc: Swift, Lauren; Assam, Mark (FTA); Costanza, Ann

**Subject:** West Seattle and Ballard Link Extensions Agency Coordination Plan

**Date:** Friday, May 10, 2019 4:23:00 PM

Attachments: WSBLE Agency Coordination Plan 20190510.pdf

image001.png

#### Chairwoman Hansen:

The Federal Transit Administration (FTA) and Sound Transit initiated the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA) in February 2019. At that time, Sound Transit invited the Duwamish Tribe to participate in the environmental review process as a participating or cooperating agency.

In accordance with 23 United States Code (USC) Section 139(g)(1), FTA and Sound Transit have prepared the attached Agency and Tribal Coordination Plan. The objective of the Agency and Tribal Coordination Plan is to identify key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. The Agency and Tribal Coordination Plan includes a schedule in Section 5.4, Agency and Tribal Coordination Milestone Schedule. Pursuant to 23 USC Section 139(g)(1)(B), FTA and Sound Transit request your concurrence with the proposed schedule by June 10<sup>th</sup>. If we do not receive a response from your agency within the above timeframe, we will assume that you concur with the schedule.

If you have any questions or would like to discuss any details of the WSBLE Project, Agency and Tribal Coordination Plan, or schedule, please contact Lauren Swift at Sound Transit (206-398-5301; <a href="mailto:lauren.swift@soundtransit.org">lauren.swift@soundtransit.org</a>) or Mark Assam at FTA (206-220-4465; <a href="mailto:mark.assam@dot.gov">mark.assam@dot.gov</a>).

Thank you, Erin

### Erin Green

Senior Environmental Planner Environmental Affairs and Sustainability Sound Transit (206) 398-5464

Connect with us facebook.com/SoundTransit twitter.com/SoundTransit



From: Green, Erin

To: <u>info@snohomishtribe.com</u>

Bcc: Swift, Lauren; Assam, Mark (FTA); Ann Costanza

**Subject:** West Seattle and Ballard Link Extensions Agency Coordination Plan

**Date:** Friday, May 10, 2019 4:22:00 PM

Attachments: WSBLE Agency Coordination Plan 20190510.pdf

image001.png

#### Chairman Evans:

The Federal Transit Administration (FTA) and Sound Transit initiated the preparation of an Environmental Impact Statement (EIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, pursuant to the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA) in February 2019. At that time, Sound Transit invited the Snohomish Tribe to participate in the environmental review process as a participating or cooperating agency.

In accordance with 23 United States Code (USC) Section 139(g)(1), FTA and Sound Transit have prepared the attached Agency and Tribal Coordination Plan. The objective of the Agency and Tribal Coordination Plan is to identify key coordination points to solicit continued feedback on the WSBLE Project during the environmental review process. The Agency and Tribal Coordination Plan includes a schedule in Section 5.4, Agency and Tribal Coordination Milestone Schedule. Pursuant to 23 USC Section 139(g)(1)(B), FTA and Sound Transit request your concurrence with the proposed schedule by June 10<sup>th</sup>. If we do not receive a response from your agency within the above timeframe, we will assume that you concur with the schedule.

If you have any questions or would like to discuss any details of the WSBLE Project, Agency and Tribal Coordination Plan, or schedule, please contact Lauren Swift at Sound Transit (206-398-5301; <a href="mailto:lauren.swift@soundtransit.org">lauren.swift@soundtransit.org</a>) or Mark Assam at FTA (206-220-4465; <a href="mailto:mark.assam@dot.gov">mark.assam@dot.gov</a>).

Thank you, Erin

#### Erin Green

Senior Environmental Planner Environmental Affairs and Sustainability Sound Transit (206) 398-5464

Connect with us facebook.com/SoundTransit twitter.com/SoundTransit





May 21, 2019

Ms. Linda Gehrke Deputy Regional Administrator Federal Transit Administration 915 Second Avenue Suite 3142 Seattle, WA. 98174-1002

In future correspondence please refer to: Project Tracking Code: 2019-02-01457

Property: King County\_ West Seattle to Ballard Light Rail Extension Re: Agency and Tribal Coordination Plan Review Comments

Dear Ms. Gehrke:

Thank you for contacting the Department of Archaeology and Historic Preservation (DAHP) and providing the Agency and Tribal Coordination Plan for the above referenced project. I have reviewed the plan and concur with the schedule provided in Section 5.4.

We appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw Transportation Archaeologist (360) 586-3085

dennis.wardlaw@dahp.wa.gov



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915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

July 23, 2019

The Honorable Jaison Elkins Chairman Muckleshoot Indian Tribe 39015 - 172nd Avenue Southeast Auburn, WA 98092

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Geotechnical Investigation Project

National Historic Preservation Act, Section 106

**Eligibility and Effects Determination** 

Dear Chairman Elkins:

On February 25, 2019, the Federal Transit Administration (FTA) initiated Section 106 consultation with your tribe for the West Seattle and Ballard Link Extensions Project as proposed by Sound Transit. In May 2019, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to identify if other alternatives suggested during the scoping process will be studied in the EIS. To support the forthcoming EIS, FTA and Sound Transit now propose the West Seattle and Ballard Link Extensions Geotechnical Investigation Project (Project). The Project is comprised of a series of geotechnical borings which will support the ongoing design and environmental analysis of the overall West Seattle and Ballard Link Extensions Project, but is being treated as a separate federal undertaking subject to the provisions of Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation, and requests your comments on the proposed Area of Potential Effects (APE), and Eligibility and Effects Determinations for the Project.

To support the evaluation of the Project, Sound Transit's consultant Jacobs Engineering Group, Inc. (Jacobs) has prepared *West Seattle and Ballard Link Extensions Geotechnical Investigation Cultural Resources Assessment and Inadvertent Discovery Plan*, dated July 2019 (Cultural Resources Report). A copy of the Cultural Resources Report is enclosed with this letter for your review.

# **Undertaking Description**

The Project proposes up to 482 geotechnical borings located along the light rail extension alternatives to be studied in the EIS. Most of the borings will be approximately four to eight inches in diameter, and vary in depth from approximately 100 to 350 feet. Drilling methods will include hollow-stem auger, mud-rotary, and sonic. Drilling will be completed using either a truck- or track-mounted drill rig. The general work area for each boring will be approximately 60 feet long and 10 to 12 feet wide, to accommodate the drill rig and associated work space. There will also be trial pump tests at two boring locations (one on 5th Avenue and one on 6th Avenue, to either side of Pine Street). The pump tests will involve drilling in an air rotary hole larger than the geotechnical borings at approximately 12 inches for the pumping well, and four monitoring wells around each of the well holes. Borings will be backfilled with bentonite, and the drilling contractor will restore the property after work is completed. Boring locations are shown in Appendix A of the enclosed Cultural Resources Report. Boring locations may shift slightly based on the locations of underground utilities and access constraints.

The proposed APE for the Project includes the footprint of each boring and extends in a 75-foot radius around each boring (see Figure 2-1 of the enclosed Cultural Resources Report). The APE includes the work area for the borings, which will be approximately 60 feet long and 10 to 12 feet wide to accommodate the drill rig and associated work space, support equipment, and a 15-foot buffer.

## **Cultural Resources Evaluation**

The enclosed Cultural Resources Report documents the results of the background research conducted for the Project by Jacobs archaeologists and architectural historians. Jacobs staff reviewed geological mapping (including LiDAR), the WISAARD database, the Washington Statewide Archaeology Predictive Model, ethnographic place name locations, and historical-based archival records and previous studies within the vicinity of the geotechnical investigation proposed by the Project.

# Archaeological Resources

There is one previously recorded historic archaeological site (45KI765) within the Project APE that is more than 50 feet away from a proposed geotechnical boring. Archaeological site 45KI765 was determined not eligible for listing in the National Register of Historic Places (NRHP) in 2005. There are also two precontact archaeological sites (45KI1353 and 45KI52) within 1,000 feet of the APE and four historic archaeological sites (45KI765, 45KI958, 45KI1223, and 45KI1185) within 500 feet. Section 6 of the Cultural Resources Report describes these sites, along with archaeological sensitivity areas. Archaeological monitoring is proposed for the 59 borings that are located in areas with moderate to high sensitivity for precontact/ethnographic archaeological resources, or historical archaeological resources (see Section 8 and Appendices A, B, and C of the Cultural Resources Report). The archaeological monitoring will also help inform the subsequent EIS evaluations for the overall West Seattle and Ballard Link Extensions Project.

Archaeological monitoring will follow the Archaeological Monitoring Plan, which is described in Appendix J of the Cultural Resources Report. This appendix also includes the Inadvertent

Discovery Plan which will be implemented during Project execution to address the potential to encounter cultural materials. The results of the archaeological monitoring will be documented in a historic and archaeological technical report that will be an appendix to the subsequent EIS for the overall West Seattle and Ballard Link Extensions Project.

### Historic Resources

There are 85 borings located within 75 feet of built environment properties that are either NRHP-listed or eligible for listing. These borings and the proximal NRHP-listed or eligible resources are listed in Appendix F of the Cultural Resources Report. Of these, three borings are located outside of the public right-of-way and within the property boundary of the NRHP-eligible Memorial Stadium. Additionally, 46 borings are located within the public right-of-way within the Seattle Chinatown National Historic District and the Pioneer Square-Skid Row National Historic District; 11 of these borings are located in both districts. All other borings within 75 feet of built environment properties that are NRHP-listed or eligible for listing are located within the public right-of-way and not within the physical property boundary of the resources.

As described above, all borings are temporary in nature. Borings located in Memorial Stadium will not adversely affect the historic property because no aspect of the integrity will be altered or diminished. Borings located in the public right-of-way will not directly or indirectly affect built environment historic resources.

It is possible that other NHRP-eligible resources that have not yet been identified, evaluated, and recorded are within 75 feet of the proposed borings. However, these borings would be in public right-of-way or parking lots, and would not have the potential to directly or indirectly affect additional historic properties, if any exist.

## **Determinations**

Based on the aforementioned documentation, FTA has made the following determinations:

- The APE for the Project is limited to a 75-foot radius around each boring location as depicted on Figure 2-1 of the enclosed Cultural Resources Report.
- There are 26 resources listed on, or eligible for, the NRHP within the APE as outlined in Table 4-1 of the enclosed Cultural Resources Report.
- The Project would have **no adverse effect** on resources on or eligible for the NRHP.

Pursuant to 36 CFR Part 800, FTA respectfully requests any comments you may have with these determinations within 30 days of receipt of this letter. If you have any questions, please contact Mark Assam, FTA, at (206) 220-4465 or mark.assam@dot.gov, or Lauren Swift, Sound Transit, at (206) 398-5301 or lauren.swift@soundtransit.org.

July 23, 2019 Page 4

Thank you for your consultation on the Project.

Sincerely,

LINDA M by LINDA M GEHRKE
GEHRKE Date: 2019.07.23
14:05:41-07'00'

Linda M. Gehrke Regional Administrator

cc: Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Geotechnical Investigation Cultural Resources Assessment and Inadvertent

Discovery Plan, July 2019



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

July 23, 2019

The Honorable Robert de los Angeles Chairman Snoqualmie Indian Tribe P.O. Box 969 Snoqualmie, WA 98065

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Geotechnical Investigation Project

National Historic Preservation Act, Section 106

**Eligibility and Effects Determination** 

Dear Chairman de los Angeles:

On February 25, 2019, the Federal Transit Administration (FTA) initiated Section 106 consultation with your tribe for the West Seattle and Ballard Link Extensions Project as proposed by Sound Transit. In May 2019, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to identify if other alternatives suggested during the scoping process will be studied in the EIS. To support the forthcoming EIS, FTA and Sound Transit now propose the West Seattle and Ballard Link Extensions Geotechnical Investigation Project (Project). The Project is comprised of a series of geotechnical borings which will support the ongoing design and environmental analysis of the overall West Seattle and Ballard Link Extensions Project, but is being treated as a separate federal undertaking subject to the provisions of Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation, and requests your comments on the proposed Area of Potential Effects (APE), and Eligibility and Effects Determinations for the Project.

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July 23, 2019 Page 4

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2019.07.23 14:08:01 -07'00'

Linda M. Gehrke Regional Administrator

cc: Steven Mullen-Moses, Director, Archeology and Historic Preservation, Snoqualmie Indian Tribe

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Geotechnical Investigation Cultural Resources Assessment and Inadvertent

Discovery Plan, July 2019



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July 23, 2019

The Honorable Shawn Yanity Chairman Stillaguamish Tribe of Indians of Washington P.O. Box 277 Arlington, WA 98223-0297

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Geotechnical Investigation Project

National Historic Preservation Act, Section 106

**Eligibility and Effects Determination** 

Dear Chairman Yanity:

On February 25, 2019, the Federal Transit Administration (FTA) initiated Section 106 consultation with your tribe for the West Seattle and Ballard Link Extensions Project as proposed by Sound Transit. In May 2019, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to identify if other alternatives suggested during the scoping process will be studied in the EIS. To support the forthcoming EIS, FTA and Sound Transit now propose the West Seattle and Ballard Link Extensions Geotechnical Investigation Project (Project). The Project is comprised of a series of geotechnical borings which will support the ongoing design and environmental analysis of the overall West Seattle and Ballard Link Extensions Project, but is being treated as a separate federal undertaking subject to the provisions of Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation, and requests your comments on the proposed Area of Potential Effects (APE), and Eligibility and Effects Determinations for the Project.

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July 23, 2019 Page 4

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Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2019.07.23 14:09:20 -07'00'

Linda M. Gehrke Regional Administrator

cc: Kerry Lyste, THPO, Stillaguamish Tribe of Indians of Washington
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Geotechnical Investigation Cultural Resources Assessment and Inadvertent

Discovery Plan, July 2019



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

July 23, 2019

The Honorable Leonard Forsman Chairman Suquamish Indian Tribe of the Port Madison Reservation P.O. Box 498 Suquamish, WA 98392-0498

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Geotechnical Investigation Project

**National Historic Preservation Act, Section 106** 

**Eligibility and Effects Determination** 

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July 23, 2019 Page 4

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LINDA M Digitally signed by LINDA M GEHRKE

Date: 2019.07.23
14:11:09-07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Lewarch, Cultural Resources, Suquamish Indian Tribe of the Port Madison Reservation

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Geotechnical Investigation Cultural Resources Assessment and Inadvertent

Discovery Plan, July 2019



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July 23, 2019

The Honorable Teri Gobin Chairwoman Tulalip Tribes of Washington 6406 Marine Drive Tulalip, WA 98271

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Geotechnical Investigation Project

**National Historic Preservation Act, Section 106** 

**Eligibility and Effects Determination** 

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The proposed APE for the Project includes the footprint of each boring and extends in a 75-foot radius around each boring (see Figure 2-1 of the enclosed Cultural Resources Report). The APE includes the work area for the borings, which will be approximately 60 feet long and 10 to 12 feet wide to accommodate the drill rig and associated work space, support equipment, and a 15-foot buffer.

## **Cultural Resources Evaluation**

The enclosed Cultural Resources Report documents the results of the background research conducted for the Project by Jacobs archaeologists and architectural historians. Jacobs staff reviewed geological mapping (including LiDAR), the WISAARD database, the Washington Statewide Archaeology Predictive Model, ethnographic place name locations, and historical-based archival records and previous studies within the vicinity of the geotechnical investigation proposed by the Project.

# Archaeological Resources

There is one previously recorded historic archaeological site (45KI765) within the Project APE that is more than 50 feet away from a proposed geotechnical boring. Archaeological site 45KI765 was determined not eligible for listing in the National Register of Historic Places (NRHP) in 2005. There are also two precontact archaeological sites (45KI1353 and 45KI52) within 1,000 feet of the APE and four historic archaeological sites (45KI765, 45KI958, 45KI1223, and 45KI1185) within 500 feet. Section 6 of the Cultural Resources Report describes these sites, along with archaeological sensitivity areas. Archaeological monitoring is proposed for the 59 borings that are located in areas with moderate to high sensitivity for precontact/ethnographic archaeological resources, or historical archaeological resources (see Section 8 and Appendices A, B, and C of the Cultural Resources Report). The archaeological monitoring will also help inform the subsequent EIS evaluations for the overall West Seattle and Ballard Link Extensions Project.

Archaeological monitoring will follow the Archaeological Monitoring Plan, which is described in Appendix J of the Cultural Resources Report. This appendix also includes the Inadvertent

Discovery Plan which will be implemented during Project execution to address the potential to encounter cultural materials. The results of the archaeological monitoring will be documented in a historic and archaeological technical report that will be an appendix to the subsequent EIS for the overall West Seattle and Ballard Link Extensions Project.

### Historic Resources

There are 85 borings located within 75 feet of built environment properties that are either NRHP-listed or eligible for listing. These borings and the proximal NRHP-listed or eligible resources are listed in Appendix F of the Cultural Resources Report. Of these, three borings are located outside of the public right-of-way and within the property boundary of the NRHP-eligible Memorial Stadium. Additionally, 46 borings are located within the public right-of-way within the Seattle Chinatown National Historic District and the Pioneer Square-Skid Row National Historic District; 11 of these borings are located in both districts. All other borings within 75 feet of built environment properties that are NRHP-listed or eligible for listing are located within the public right-of-way and not within the physical property boundary of the resources.

As described above, all borings are temporary in nature. Borings located in Memorial Stadium will not adversely affect the historic property because no aspect of the integrity will be altered or diminished. Borings located in the public right-of-way will not directly or indirectly affect built environment historic resources.

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## **Determinations**

Based on the aforementioned documentation, FTA has made the following determinations:

- The APE for the Project is limited to a 75-foot radius around each boring location as depicted on Figure 2-1 of the enclosed Cultural Resources Report.
- There are 26 resources listed on, or eligible for, the NRHP within the APE as outlined in Table 4-1 of the enclosed Cultural Resources Report.
- The Project would have **no adverse effect** on resources on or eligible for the NRHP.

Pursuant to 36 CFR Part 800, FTA respectfully requests any comments you may have with these determinations within 30 days of receipt of this letter. If you have any questions, please contact Mark Assam, FTA, at (206) 220-4465 or mark.assam@dot.gov, or Lauren Swift, Sound Transit, at (206) 398-5301 or lauren.swift@soundtransit.org.

July 23, 2019 Page 4

Thank you for your consultation on the Project.

Sincerely,

Digitally signed by LINDA M GEHRKE Date: 2019.07.23 14:13:11-07'00'

Linda M. Gehrke

Regional Administrator

cc: Richard Young, Cultural Resources, Hibulb Cultural Center & Natural History Preserve, Tulalip Tribes of Washington

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Geotechnical Investigation Cultural Resources Assessment and Inadvertent

Discovery Plan, July 2019



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

July 23, 2019

The Honorable JoDe Goudy Chairman Confederated Tribes and Bands of the Yakama Nation P.O. Box 151 Toppenish, WA 98948

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Geotechnical Investigation Project

National Historic Preservation Act, Section 106

**Eligibility and Effects Determination** 

Dear Chairman Goudy:

On February 25, 2019, the Federal Transit Administration (FTA) initiated Section 106 consultation with your tribe for the West Seattle and Ballard Link Extensions Project as proposed by Sound Transit. In May 2019, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to identify if other alternatives suggested during the scoping process will be studied in the EIS. To support the forthcoming EIS, FTA and Sound Transit now propose the West Seattle and Ballard Link Extensions Geotechnical Investigation Project (Project). The Project is comprised of a series of geotechnical borings which will support the ongoing design and environmental analysis of the overall West Seattle and Ballard Link Extensions Project, but is being treated as a separate federal undertaking subject to the provisions of Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation, and requests your comments on the proposed Area of Potential Effects (APE), and Eligibility and Effects Determinations for the Project.

To support the evaluation of the Project, Sound Transit's consultant Jacobs Engineering Group, Inc. (Jacobs) has prepared *West Seattle and Ballard Link Extensions Geotechnical Investigation Cultural Resources Assessment and Inadvertent Discovery Plan*, dated July 2019 (Cultural Resources Report). A copy of the Cultural Resources Report is enclosed with this letter for your review.

# **Undertaking Description**

The Project proposes up to 482 geotechnical borings located along the light rail extension alternatives to be studied in the EIS. Most of the borings will be approximately four to eight inches in diameter, and vary in depth from approximately 100 to 350 feet. Drilling methods will include hollow-stem auger, mud-rotary, and sonic. Drilling will be completed using either a truck- or track-mounted drill rig. The general work area for each boring will be approximately 60 feet long and 10 to 12 feet wide, to accommodate the drill rig and associated work space. There will also be trial pump tests at two boring locations (one on 5th Avenue and one on 6th Avenue, to either side of Pine Street). The pump tests will involve drilling in an air rotary hole larger than the geotechnical borings at approximately 12 inches for the pumping well, and four monitoring wells around each of the well holes. Borings will be backfilled with bentonite, and the drilling contractor will restore the property after work is completed. Boring locations are shown in Appendix A of the enclosed Cultural Resources Report. Boring locations may shift slightly based on the locations of underground utilities and access constraints.

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## **Cultural Resources Evaluation**

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Pursuant to 36 CFR Part 800, FTA respectfully requests any comments you may have with these determinations within 30 days of receipt of this letter. If you have any questions, please contact Mark Assam, FTA, at (206) 220-4465 or mark.assam@dot.gov, or Lauren Swift, Sound Transit, at (206) 398-5301 or lauren.swift@soundtransit.org.

July 23, 2019 Page 4

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2019.07.23
14:14:28 -07'00'

Linda M. Gehrke Regional Administrator

cc: Kate Valdez, THPO, Confederated Tribes and Bands of the Yakama Nation Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Geotechnical Investigation Cultural Resources Assessment and Inadvertent

Discovery Plan, July 2019



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

July 23, 2019

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Geotechnical Investigation Project

National Historic Preservation Act, Section 106

**Eligibility and Effects Determination** 

Dear Dr. Brooks:

On February 25, 2019, the Federal Transit Administration (FTA) initiated Section 106 consultation with the Washington State Historic Preservation Officer (SHPO) for the West Seattle and Ballard Link Extensions Project (Project Tracking Code: 2018-02-01062) as proposed by Sound Transit. In May 2019, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to identify if other alternatives suggested during the scoping process will be studied in the EIS. To support the forthcoming EIS, FTA and Sound Transit now propose the West Seattle and Ballard Link Extensions Geotechnical Investigation Project (Project). The Project is comprised of a series of geotechnical borings which will support the ongoing design and environmental analysis of the overall West Seattle and Ballard Link Extensions Project, but is being treated as a separate federal undertaking subject to the provisions of Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter initiates Section 106 consultation, requests your feedback on the proposed Area of Potential Effects (APE), and requests your concurrence with the proposed Eligibility and Effects Determinations for the Project.

To support the evaluation of the Project, Sound Transit's consultant Jacobs Engineering Group, Inc. (Jacobs) has prepared *West Seattle and Ballard Link Extensions Geotechnical Investigation Cultural Resources Assessment and Inadvertent Discovery Plan*, dated July 2019 (Cultural

Resources Report). A copy of the Cultural Resources Report is enclosed with this letter for your review.

# **Undertaking Description**

The Project proposes up to 482 geotechnical borings located along the light rail extension alternatives to be studied in the EIS. Most of the borings will be approximately four to eight inches in diameter, and vary in depth from approximately 100 to 350 feet. Drilling methods will include hollow-stem auger, mud-rotary, and sonic. Drilling will be completed using either a truck- or track-mounted drill rig. The general work area for each boring will be approximately 60 feet long and 10 to 12 feet wide, to accommodate the drill rig and associated work space. There will also be trial pump tests at two boring locations (one on 5th Avenue and one on 6th Avenue, to either side of Pine Street). The pump tests will involve drilling in an air rotary hole larger than the geotechnical borings at approximately 12 inches for the pumping well, and four monitoring wells around each of the well holes. Borings will be backfilled with bentonite, and the drilling contractor will restore the property after work is completed. Boring locations are shown in Appendix A of the enclosed Cultural Resources Report. Boring locations may shift slightly based on the locations of underground utilities and access constraints.

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## **Cultural Resources Evaluation**

The enclosed Cultural Resources Report documents the results of the background research conducted for the Project by Jacobs archaeologists and architectural historians. Jacobs staff reviewed geological mapping (including LiDAR), the WISAARD database, the Washington Statewide Archaeology Predictive Model, ethnographic place name locations, and historical-based archival records and previous studies within the vicinity of the geotechnical investigation proposed by the Project.

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July 23, 2019 Page 4

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

Date: 2019.07.23
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Linda M. Gehrke Regional Administrator

 Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
 Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Geotechnical Investigation Cultural Resources Assessment and Inadvertent

Discovery Plan, July 2019



July 24, 2019

The Honorable Cecile Hansen Chairwoman Duwamish Tribe 4705 W Marginal Way SW Seattle, WA 98106

Subject: West Seattle and Ballard Link Extension Geotechnical Investigation National Historic Preservation Act, Section 106 Eligibility and Effects Determination

Dear Chair Hansen:

On February 14, 2018, Sound Transit invited the Duwamish Tribe to participate in the environmental review process for the West Seattle and Ballard Link Extensions Project. In May 2019, the Sound Transit Board, in coordination with the Federal Transit Administration (FTA), identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to identify if other alternatives suggested during the scoping process will be studied in the EIS. To support the forthcoming EIS, FTA and Sound Transit now propose the West Seattle and Ballard Link Extensions Geotechnical Investigation Project (Project). The Project is comprised of a series of geotechnical borings which will support the ongoing design and environmental analysis of the overall West Seattle and Ballard Link Extensions Project, but is being treated as a separate federal undertaking subject to the provisions of Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter requests your comments on the proposed Area of Potential Effects (APE), and Eligibility and Effects Determinations for the Project.

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Central Puget Sound Regional Transit Authority • Union Station 401 S. Jackson St., Seattle, WA 98104-2826 • Reception: (206) 398-5000 • FAX: (206) 398-5499 www.soundtransit.org

each boring will be approximately 60 feet long and 10 to 12 feet wide, to accommodate the drill rig and associated work space. There will also be trial pump tests at two boring locations (one on 5th Avenue and one on 6th Avenue, to either side of Pine Street). The pump tests will involve drilling in an air rotary hole larger than the geotechnical borings at approximately 12 inches for the pumping well, and four monitoring wells around each of the well holes. Borings will be backfilled with bentonite, and the drilling contractor will restore the property after work is completed. Boring locations are shown in Appendix A of the enclosed Cultural Resources Report. Boring locations may shift slightly based on the locations of underground utilities and access constraints.

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We respectfully requests any comments you may have with these determinations within 30 days of receipt of this letter. If you have any questions, please contact me at (206) 398-5464 or erin.green@soundtransit.org.

Sincerely,

Erin Green

Senior Environmental Planner

Enclosure: CD of Geotechnical Investigation Cultural Resources Assessment and Inadvertent Discovery Plan, July 2019





July 24, 2019

The Honorable Michael didahalqid Evans Chairman Snohomish Tribe 9792 Edmonds Way Box 267 Edmonds, WA 98020

Subject: West Seattle and Ballard Link Extension Geotechnical Investigation National Historic Preservation Act, Section 106 Eligibility and Effects Determination

Dear Chair Evans:

On February 14, 2018, Sound Transit invited the Snohomish Tribe to participate in the environmental review process for the West Seattle and Ballard Link Extensions Project. In May 2019, the Sound Transit Board, in coordination with the Federal Transit Administration (FTA), identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to identify if other alternatives suggested during the scoping process will be studied in the EIS. To support the forthcoming EIS, FTA and Sound Transit now propose the West Seattle and Ballard Link Extensions Geotechnical Investigation Project (Project). The Project is comprised of a series of geotechnical borings which will support the ongoing design and environmental analysis of the overall West Seattle and Ballard Link Extensions Project, but is being treated as a separate federal undertaking subject to the provisions of Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter requests your comments on the proposed Area of Potential Effects (APE), and Eligibility and Effects Determinations for the Project.

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CHIEF EXECUTIVE OFFICER
Peter M. Rogoff

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The enclosed Cultural Resources Report documents the results of the background research conducted for the Project by Jacobs archaeologists and architectural historians. Jacobs staff reviewed geological mapping (including LiDAR), the WISAARD database, the Washington Statewide Archaeology Predictive Model, ethnographic place name locations, and historical-based archival records and previous studies within the vicinity of the geotechnical investigation proposed by the Project.

#### Archaeological Resources

There is one previously recorded historic archaeological site (45KI765) within the Project APE that is more than 50 feet away from a proposed geotechnical boring. Archaeological site 45KI765 was determined not eligible for listing in the National Register of Historic Places (NRHP) in 2005. There are also two precontact archaeological sites (45KI1353 and 45KI52) within 1,000 feet of the APE and four historic archaeological sites (45KI765, 45KI958, 45KI1223, and 45KI1185) within 500 feet. Section 6 of the Cultural Resources Report describes these sites, along with archaeological sensitivity areas. Archaeological monitoring is proposed for the 59 borings that are located in areas with moderate to high sensitivity for precontact/ethnographic archaeological resources, or historical archaeological resources (see Section 8 and Appendices A, B, and C of the Cultural Resources Report). The archaeological monitoring will also help inform the subsequent EIS evaluations for the overall West Seattle and Ballard Link Extensions Project.

Archaeological monitoring will follow the Archaeological Monitoring Plan, which is described in Appendix J of the Cultural Resources Report. This appendix also includes the Inadvertent Discovery Plan which will be implemented during Project execution to address the potential to encounter cultural materials. The results of the archaeological monitoring will be documented in a historic and archaeological technical report that will be an appendix to the subsequent EIS for the overall West Seattle and Ballard Link Extensions Project.

## Historic Resources

There are 85 borings located within 75 feet of built environment properties that are either NRHP-listed or eligible for listing. These borings and the proximal NRHP-listed or eligible resources are listed in Appendix F of the Cultural Resources Report. Of these, three borings are located outside of the public right-of-way and within the property boundary of the NRHP-eligible Memorial Stadium. Additionally, 46 borings are located within the public right-of-way within the Seattle Chinatown National Historic District and the Pioneer Square-Skid Row National Historic District; 11 of these borings are located in both districts. All other borings within 75 feet of built environment properties that are NRHP-listed or eligible for listing are located within the public right-of-way and not within the physical property boundary of the resources.

As described above, all borings are temporary in nature. Borings located in Memorial Stadium will not adversely affect the historic property because no aspect of the integrity will be altered or diminished. Borings located in the public right-of-way will not directly or indirectly affect built environment historic resources.

It is possible that other NHRP-eligible resources that have not yet been identified, evaluated, and recorded are within 75 feet of the proposed borings. However, these borings would be in public right-of-way or parking lots, and would not have the potential to directly or indirectly affect additional historic properties, if any exist.

## **Determinations**

Based on the aforementioned documentation, FTA has made the following determinations:

- The APE for the Project is limited to a 75-foot radius around each boring location as depicted on Figure 2-1 of the enclosed Cultural Resources Report.
- There are 26 resources listed on, or eligible for, the NRHP within the APE as outlined in Table 4-1 of the enclosed Cultural Resources Report.
- The Project would have no adverse effect on resources on or eligible for the NRHP.

We respectfully requests any comments you may have with these determinations within 30 days of receipt of this letter. If you have any questions, please contact me at (206) 398-5464 or erin.green@soundtransit.org.

Sincerely,

Erin Green

Senior Environmental Planner

Enclosure: CD of Geotechnical Investigation Cultural Resources Assessment and Inadvertent Discovery Plan, July 2019



August 9, 2019

Ms. Linda Gehrke Deputy Regional Administrator Federal Transit Administration 915 Second Avenue Suite 3142 Seattle, WA. 98174-1002

In future correspondence please refer to: Project Tracking Code: 2019-02-01457

Property: King County\_West Seattle To Ballard Light Rail Extension\_Geotechnical Investigation

Re: NO Adverse Effect

Dear Ms. Gehrke:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. This action has been reviewed on behalf of the SHPO under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your communication.

First, we agree with the Area of Potential Effect (APE) as mapped in the survey report. We also concur that the current project as proposed will have "NO ADVERSE EFFECT" on historic properties within the APE that are listed in, or determined eligible for listing in, the National Register of Historic Places. As a result of our concurrence, further contact with DAHP on this proposal is not necessary.

However, if new information about affected resources becomes available and/or the project scope of work changes significantly, please resume consultation as our assessment may be revised. Also, if any archaeological resources are uncovered during construction, please halt work immediately in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw Transportation Archaeologist (360) 586-3085

dennis.wardlaw@dahp.wa.gov



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From: Green, Erin

To: <u>Cecile@duwamishtribe.org</u>

Cc: Swift, Lauren; Assam, Mark (FTA); Costanza, Ann

Subject: West Seattle and Ballard Link Extensions Environmental Methodologies for Review

**Date:** Monday, September 09, 2019 12:38:00 PM

Attachments: <u>image001.png</u>

WSBLE EISMethodologies Aug2019.pdf WSBLE EISMethodologies Comments.xlsx

#### Dear Chair Hansen:

In February 2019, the Federal Transit Administration (FTA) and Sound Transit invited you to participate in the environmental review process for the Sound Transit West Seattle and Ballard Link Extensions project, consistent with the provisions of 23 United States Code 139 and 23 Code of Federal Regulations 771.111. Scoping was completed on April 2, 2019, and in May, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to identify if other alternatives suggested during the scoping process will be studied in the EIS.

At this time, FTA and Sound Transit invite you to review the methodologies proposed for environmental analysis in the EIS. The EIS is being prepared as a combined National Environmental Policy Act and State Environmental Policy Act document, and will include the following topic areas:

- Acquisitions, Displacements, and Relocations
- Air Quality
- Economics
- Ecosystem Resources
- Electromagnetic Fields
- Energy
- Environmental Justice
- Geology and Soils
- Hazardous Materials
- Historic and Archaeological Resources
- Land Use
- Noise and Vibration
- Park and Recreational Resources
- Public Services
- Section 4(f)
- Section 6(f) and Resource Conservation Office
- Social Resources, Community Facilities, and Neighborhoods
- Transportation
- Utilities
- Visual and Aesthetic Resources
- Water Resources

The proposed technical methodologies address these topics areas. FTA and Sound Transit request

your review on those topic areas within your area of expertise. The draft Environmental Methodology Report is attached to this email (WSBLE\_EISMethodologies\_Aug2019.pdf). FTA and Sound Transit respectfully request that you consolidate your comments and record them in the attached comment form (WSBLE\_EISMethodologies\_Comments.xlsx).

Please provide comments via email by **October 9, 2019**. FTA and Sound Transit staff are available to meet with you to discuss the methodologies at your request. After receipt of comments, FTA and Sound Transit will revise the methodologies, as appropriate, and make the final report available.

Please contact me or Lauren Swift (<u>lauren.swift@soundtransit.org</u> or 206-398-5301) if you have any questions.

Thank you,

## Erin Green

Senior Environmental Planner Environmental Affairs and Sustainability Sound Transit (206) 398-5464

Connect with us facebook.com/SoundTransit twitter.com/SoundTransit



From: Green, Erin

To: <a href="mailto:info@snohomishtribe.com">info@snohomishtribe.com</a>

Cc: Swift, Lauren; Assam, Mark (FTA); Costanza, Ann

Subject: West Seattle and Ballard Link Extensions Environmental Methodologies for Review

Date: Monday, September 09, 2019 12:37:00 PM
Attachments: WSBLE EISMethodologies Aug2019.pdf
WSBLE EISMethodologies Comments.xlsx

image001.png

#### Dear Chair Evans:

In February 2019, the Federal Transit Administration (FTA) and Sound Transit invited you to participate in the environmental review process for the Sound Transit West Seattle and Ballard Link Extensions project, consistent with the provisions of 23 United States Code 139 and 23 Code of Federal Regulations 771.111. Scoping was completed on April 2, 2019, and in May, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to identify if other alternatives suggested during the scoping process will be studied in the EIS.

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Please provide comments via email by **October 9, 2019**. FTA and Sound Transit staff are available to meet with you to discuss the methodologies at your request. After receipt of comments, FTA and Sound Transit will revise the methodologies, as appropriate, and make the final report available.

Please contact me or Lauren Swift (<u>lauren.swift@soundtransit.org</u> or 206-398-5301) if you have any questions.

Thank you, Erin

## Erin Green

Senior Environmental Planner Environmental Affairs and Sustainability Sound Transit (206) 398-5464

Connect with us facebook.com/SoundTransit twitter.com/SoundTransit



From: <u>Green, Erin</u>

To: Anne-c.fennessy-c@seattle.gov; Colin.Drake@seattle.gov; christie.true@kingcounty.gov; Gannon, Rob; Crosley,

Stephen; Dan.Shoemaker@faa.gov; michael.ohare@fema.dhs.gov; Handel, Lindsey; Sharon.Love@dot.gov; jeffrey.james@dot.gov; lydia.kachadoorian@dot.gov; branden.criman@dot.gov; scott.anderson@noaa.gov;

Donna.Wieting@noaa.gov; rory.w.lee@usace.army.mil; Dana.M.Dysart@usace.army.mil;

bryan.mercier@bia.gov; Carl.F.Smith@uscg.mil; Steven.M.Fischer3@uscg.mil; WA Webmanager@hud.gov; Allison O"Brien@ios.doi.gov; Nogi.jill@Epamail.epa.gov; jim muck@fws.gov; chaun.benjamin@gsa.gov; Davon.M.Collins@usps.gov; rpduda@fbi.gov; robert.r.cantu@hq.dhs.gov; dchamberlain@nwseaportalliance.com;

jwolfe@nwseaportalliance.com; Kilroy.S@portseattle.org; Poor, Geri; craigk@pscleanair.org;

 $\underline{kmcgourty@psrc.org}; \underline{SGutschow@psrc.org}; \underline{Dennis.Wardlaw@dahp.wa.gov}; \underline{mbom461@ECY.WA.GOV};$ 

Laura.Arber@dfw.wa.gov; Sherri.Gallant@dnr.wa.gov; Jessica Giblin (giblinj@wsdot.wa.gov);

myra.barker@rco.wa.gov; ross.hunter@del.wa.gov

Cc: Swift, Lauren; Assam, Mark (FTA); Costanza, Ann; Fann, Sandra; Chahim, Leda

Subject: West Seattle and Ballard Link Extensions Environmental Methodologies for Review

**Date:** Monday, September 09, 2019 12:36:00 PM

Attachments: <u>image001.pnq</u>

WSBLE EIS Methodologies Transmittal Letter 20190909.pdf

WSBLE EISMethodologies Aug2019.pdf WSBLE EISMethodologies Comments.xlsx

#### Greetings:

In February 2019, the Federal Transit Administration (FTA) and Sound Transit invited your agency to participate in the environmental review process for the Sound Transit West Seattle and Ballard Link Extensions project, consistent with the provisions of 23 United States Code 139 and 23 Code of Federal Regulations 771.111. Scoping was completed on April 2, 2019, and in May, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to identify if other alternatives suggested during the scoping process will be studied in the EIS.

At this time, FTA and Sound Transit invite your agency to review the methodologies proposed for environmental analysis in the EIS. The EIS is being prepared as a combined National Environmental Policy Act and State Environmental Policy Act document, and will include the following topic areas:

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The proposed technical methodologies address these topics areas. FTA and Sound Transit request your review on those topic areas within your agency's area of expertise. The draft Environmental Methodology Report is attached to this email (WSBLE\_EISMethodologies\_Aug2019.pdf). FTA and Sound Transit respectfully request that you consolidate your agency comments and record them in the attached comment form (WSBLE\_EISMethodologies\_Comments.xlsx).

Please provide your agency's consolidated comments via email to <u>mark.assam@dot.gov</u> and <u>lauren.swift@soundtransit.org</u> by **September 30, 2019**. FTA and Sound Transit staff are available to meet with you to discuss the methodologies at your request. After receipt of comments, FTA and Sound Transit will revise the methodologies, as appropriate, and make the final report available.

If you have any questions or would like to discuss our agencies' respective roles and responsibilities during preparation of the EIS, please contact Lauren Swift at 206-398-5301 or <a href="mailto:lauren.swift@soundtransit.org">lauren.swift@soundtransit.org</a> or Mark Assam, FTA, at 206-220-4463 or <a href="mailto:mark.assam@dot.gov">mark.assam@dot.gov</a>.

Thank you, Erin

### Erin Green

Senior Environmental Planner Environmental Affairs and Sustainability Sound Transit (206) 398-5464

Connect with us facebook.com/SoundTransit twitter.com/SoundTransit





U.S. Department of Transportation Federal Transit Administration REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 10, 2019

The Honorable Jaison Elkins Chairman Muckleshoot Indian Tribe 39015 - 172nd Avenue SE Auburn, WA 98092

Subject: Sound Transit

West Seattle and Ballard Link Extensions Project Invitation to Review Environmental Impact Statement Technical Methodologies

Dear Chairman Elkins:

In February 2019, the Federal Transit Administration (FTA) and Sound Transit invited you to participate in the environmental review process for the Sound Transit West Seattle and Ballard Link Extensions Project. Scoping was completed on April 2, 2019, and in May, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to determine if other alternatives suggested during the scoping process will be studied in the EIS.

At this time, FTA and Sound Transit invite you to review the methodologies proposed for environmental analysis in the EIS. The EIS is being prepared as a combined National Environmental Policy Act and State Environmental Policy Act document, and will include the following topic areas:

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The proposed technical methodologies address these topics areas. FTA and Sound Transit request your review on those topic areas of interest or within your area of expertise. The draft Environmental Methodology Report is being distributed via email with this letter (WSBLE\_EISMethodologies\_Aug2019.pdf). For your convenience, also provided via email is a comment form (WSBLE\_EISMethodologies\_Comments.xlsx).

We respectfully request that you provide comments via email to mark.assam@dot.gov and lauren.swift@soundtransit.org by **October 7, 2019**. FTA and Sound Transit staff are available to meet with you to discuss the methodologies at your request. After receipt of comments, FTA and Sound Transit will revise the methodologies, as appropriate, and make the final report available.

If you have any questions, please contact Mark Assam, FTA, at (206) 220-4465 or mark.assam@dot.gov, or Lauren Swift, Sound Transit, at (206) 398-5301 or lauren.swift@soundtransit.org.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2019.09.10 07:55:00 -07'00'

Linda M. Gehrke Regional Administrator

CC: Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation
Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Environmental Methodology Report, August 2019
Environmental Impact Statement Methodologies Report Comment Form



U.S. Department of Transportation Federal Transit Administration REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 10, 2019

The Honorable Robert de los Angeles Chairman Snoqualmie Indian Tribe P.O. Box 969 Snoqualmie, WA 98065

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project
Invitation to Review Environmental Impact Statement Technical Methodologies

Dear Chairman de los Angeles:

In February 2019, the Federal Transit Administration (FTA) and Sound Transit invited you to participate in the environmental review process for the Sound Transit West Seattle and Ballard Link Extensions Project. Scoping was completed on April 2, 2019, and in May, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to determine if other alternatives suggested during the scoping process will be studied in the EIS.

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If you have any questions, please contact Mark Assam, FTA, at (206) 220-4465 or mark.assam@dot.gov, or Lauren Swift, Sound Transit, at (206) 398-5301 or lauren.swift@soundtransit.org.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2019.09.10 07:57:09 -07'00'

Linda M. Gehrke Regional Administrator

cc: Steven Mullen-Moses, Director, Archeology and Historic Preservation, Snoqualmie Indian Tribe

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Environmental Methodology Report, August 2019

Environmental Impact Statement Methodologies Report Comment Form



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 10, 2019

The Honorable Shawn Yanity Chairman Stillaguamish Tribe of Indians of Washington P.O. Box 277 Arlington, WA 98223-0297

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project Invitation to Review Environmental Impact Statement Technical Methodologies

Dear Chairman Yanity:

In February 2019, the Federal Transit Administration (FTA) and Sound Transit invited you to participate in the environmental review process for the Sound Transit West Seattle and Ballard Link Extensions Project. Scoping was completed on April 2, 2019, and in May, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to determine if other alternatives suggested during the scoping process will be studied in the EIS.

At this time, FTA and Sound Transit invite you to review the methodologies proposed for environmental analysis in the EIS. The EIS is being prepared as a combined National Environmental Policy Act and State Environmental Policy Act document, and will include the following topic areas:

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If you have any questions, please contact Mark Assam, FTA, at (206) 220-4465 or mark.assam@dot.gov, or Lauren Swift, Sound Transit, at (206) 398-5301 or lauren.swift@soundtransit.org.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2019.09.10 07:59:34 -07'00'

Linda M. Gehrke Regional Administrator

cc: Kerry Lyste, Tribal Historic Preservation Officer, Stillaguamish Tribe of Indians of Washington

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Environmental Methodology Report, August 2019

Environmental Impact Statement Methodologies Report Comment Form



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September 10, 2019

The Honorable Leonard Forsman Chairman Suquamish Indian Tribe of the Port Madison Reservation P.O. Box 498 Suquamish, WA 98392-0498

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project Invitation to Review Environmental Impact Statement Technical Methodologies

### Dear Chairman Forsman:

In February 2019, the Federal Transit Administration (FTA) and Sound Transit invited you to participate in the environmental review process for the Sound Transit West Seattle and Ballard Link Extensions Project. Scoping was completed on April 2, 2019, and in May, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to determine if other alternatives suggested during the scoping process will be studied in the EIS.

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September 10, 2019 Page 2

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Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2019.09.10
08:01:10 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Lewarch, Cultural Resources, Suquamish Indian Tribe of the Port Madison Reservation

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Environmental Methodology Report, August 2019

Environmental Impact Statement Methodologies Report Comment Form



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 10, 2019

The Honorable Teri Gobin Chairwoman Tulalip Tribes of Washington 6406 Marine Drive Tulalip, WA 98271

Subject: Sound Transit

West Seattle and Ballard Link Extensions Project Invitation to Review Environmental Impact Statement Technical Methodologies

Dear Chairwoman Gobin:

In February 2019, the Federal Transit Administration (FTA) and Sound Transit invited you to participate in the environmental review process for the Sound Transit West Seattle and Ballard Link Extensions Project. Scoping was completed on April 2, 2019, and in May, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to determine if other alternatives suggested during the scoping process will be studied in the EIS.

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Thank you for your consultation on the Project.

Sincerely,

LINDA M GEHRKE Digitally signed by LINDA M GEHRKE Date: 2019.09.10 08:03:32 -07'00'

Linda M. Gehrke Regional Administrator

cc: Richard Young, Cultural Resources, Hibulb Cultural Center & Natural History Preserve, Tulalip Tribes of Washington

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Environmental Methodology Report, August 2019

Environmental Impact Statement Methodologies Report Comment Form



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 10, 2019

The Honorable JoDe Goudy Chairman Confederated Tribes and Bands of the Yakama Nation P.O. Box 151 Toppenish, WA 98948

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project Invitation to Review Environmental Impact Statement Technical Methodologies

Dear Chairman Goudy:

In February 2019, the Federal Transit Administration (FTA) and Sound Transit invited you to participate in the environmental review process for the Sound Transit West Seattle and Ballard Link Extensions Project. Scoping was completed on April 2, 2019, and in May, the Sound Transit Board, in coordination with FTA, identified alternatives to study in an Environmental Impact Statement (EIS). This fall, the Sound Transit Board and FTA plan to determine if other alternatives suggested during the scoping process will be studied in the EIS.

At this time, FTA and Sound Transit invite you to review the methodologies proposed for environmental analysis in the EIS. The EIS is being prepared as a combined National Environmental Policy Act and State Environmental Policy Act document, and will include the following topic areas:

- Acquisitions, Displacements, and Relocations
- Air Quality
- Economics
- Ecosystem Resources
- Electromagnetic Fields
- Energy
- Environmental Justice
- Geology and Soils
- Hazardous Materials
- Historic and Archaeological Resources

- Land Use
- Noise and Vibration
- Park and Recreational Resources
- Public Services
- Section 4(f)
- Section 6(f) and Resource Conservation Office
- Social Resources, Community Facilities, and Neighborhoods
- Transportation
- Utilities
- Visual and Aesthetic Resources
- Water Resources

The proposed technical methodologies address these topics areas. FTA and Sound Transit request your review on those topic areas of interest or within your area of expertise. The draft Environmental Methodology Report is being distributed via email with this letter (WSBLE\_EISMethodologies\_Aug2019.pdf). For your convenience, also provided via email is a comment form (WSBLE\_EISMethodologies\_Comments.xlsx).

We respectfully request that you provide comments via email to mark.assam@dot.gov and lauren.swift@soundtransit.org by October 7, 2019. FTA and Sound Transit staff are available to meet with you to discuss the methodologies at your request. After receipt of comments, FTA and Sound Transit will revise the methodologies, as appropriate, and make the final report available.

If you have any questions, please contact Mark Assam, FTA, at (206) 220-4465 or mark.assam@dot.gov, or Lauren Swift, Sound Transit, at (206) 398-5301 or lauren.swift@soundtransit.org.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2019.09.10
08:04:49 -07'00'

Linda M. Gehrke Regional Administrator

cc: Kate Valdez, Tribal Historic Preservation Officer, Confederated Tribes and Bands of the Yakama Nation

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: Environmental Methodology Report, August 2019

Environmental Impact Statement Methodologies Report Comment Form



September 26, 2019

Ms. Lauren Swift Project Development Coordinator Sound Transit Union Station 401 S. Jackson Street Seattle, WA. 98104-2826

In future correspondence please refer to: Project Tracking Code: 2019-02-01457

Property: King County\_West Seattle To Ballard Light Rail Extension

Re: EIS Methodology Review Comments

Dear Ms. Swift:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. In response, we have reviewed the materials you provided for this project. Our agency has review the material provided and has the following comments regarding the cultural resource methodology:

- DAHP has concerns regarding cumulative impacts in relation to the up-zoning and long-term
  alteration to the scale and character of the neighborhoods being impacted. Furthermore, upzoning could lead to significant detrimental impacts on legacy businesses as we have seen in
  other areas of the City. Substantial demolition and highly speculative development may occur
  resulting in complete loss of historic resources and should be addressed and mitigated.
- Regarding evaluations of identified historic resources in the project APE, per Section 106 regulations, only eligibility for the National Register of Historic Places is relevant for DAHP concurrence. Please ensure that discussions of eligibility for other potential listings, including the Washington Heritage Register, are separate from National Register evaluations. This is intended to improve DAHP's review time of the Historic Property Inventory forms in order to respond in the most expedient manner possible for FTA.

Thank you for the opportunity to review and comment If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw

Transportation Archaeologist



(360) 586-3085 dennis.wardlaw@dahp.wa.gov





REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 12, 2020

The Honorable Jaison Elkins Chairman Muckleshoot Indian Tribe 39015 - 172nd Avenue SE Auburn, WA 98092

Subject: Sound Transit

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects and Archaeological Survey and Inventory Plan

SHPO Project Tracking Code: 2019-02-01457

### Dear Chairman Elkins:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation with your Tribe under Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter requests comments on the proposed Area of Potential Effects (APE) and the proposed Archaeological Survey and Inventory Plan.

## **Project Description**

The Project would extend Link light rail service approximately 11.8 miles from Downtown Seattle to both West Seattle and Ballard (see enclosed Project Vicinity Maps). The Project includes light rail guideway with elevated, at-grade, and tunnel profiles. It also includes 14 stations that would either be elevated, at-grade, or in a tunnel. The stations would serve the following areas in Seattle: Alaska Junction, Avalon, Delridge, SODO, the sports stadiums, Chinatown/International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

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- SODO, where some of the Project alternatives would reconstruct South Holgate Street and South Lander Street to cross over the existing and proposed light rail alignments, the APE extends one additional parcel from the guideway.

# Archaeological Survey and Inventory Plan

FTA and Sound Transit will identify potential direct and indirect effects of the Project on historic built environment and archaeological resources within the APE that are listed on, or determined eligible for, the National Register of Historic Places (NRHP). This effort will include previously recorded NRHP-listed or -eligible resources, as well as those identified during archaeological and historic built environment resources survey and inventory.

The proposed Archaeological Survey and Inventory Plan (Plan) is enclosed, for your review. The Plan describes the proposed archaeological inventory process that would be conducted to identify and assess the potential for intact archaeological deposits. Due to limitations on access, such as property ownership, physical inaccessibility, or other reasons, FTA and Sound Transit propose the following phased approach to the investigation:

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# **Request for Comment**

Pursuant to 36 CFR Part 800, FTA invites your comments on the proposed APE and the Archaeological Survey and Inventory Plan within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam, FTA, at (206) 220-4465 or mark.assam@dot.gov, or Alex Stevenson, Sound Transit, at (206) 553-3655 or alex.stevenson@soundtransit.org.

Thank you for your consultation on the Project.

Sincerely,

1/ Linda M. Gehrke

Regional Administrator

cc: Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: West Seattle and Ballard Link Extensions Vicinity Map

Area of Potential Effects (APE) for the Sound Transit West Seattle and Ballard

Link Extensions (November 2019)

Archaeological Survey and Inventory Plan – Phase 1, January 2020



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 12, 2020

The Honorable Robert de los Angeles Chairman Snoqualmie Indian Tribe P.O. Box 969 Snoqualmie, WA 98065

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects and Archaeological Survey and Inventory Plan

SHPO Project Tracking Code: 2019-02-01457

Dear Chairman de los Angeles:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation with your Tribe under Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter requests comments on the proposed Area of Potential Effects (APE) and the proposed Archaeological Survey and Inventory Plan.

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Thank you for your consultation on the Project.

Sincerely,

n Linda M. Gehrke

Regional Administrator

cc: Steven Mullen-Moses, Director, Archeology and Historic Preservation, Snoqualmie Indian Tribe

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: West Seattle and Ballard Link Extensions Vicinity Map

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Link Extensions (November 2019)

Archaeological Survey and Inventory Plan – Phase 1, January 2020



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 12, 2020

The Honorable Shawn Yanity Chairman Stillaguamish Tribe of Indians of Washington P.O. Box 277 Arlington, WA 98223-0297

Subject: Sound Transit

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects and Archaeological Survey and Inventory Plan

SHPO Project Tracking Code: 2019-02-01457

Dear Chairman Yanity:

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Sincerely,

Linda M. Gehrke

Regional Administrator

cc: Kerry Lyste, Tribal Historic Preservation Officer, Stillaguamish Tribe of Indians of Washington

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February 12, 2020

The Honorable Leonard Forsman Chairman Suquamish Indian Tribe of the Port Madison Reservation P.O. Box 498 Suquamish, WA 98392-0498

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects and Archaeological Survey and Inventory Plan

SHPO Project Tracking Code: 2019-02-01457

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cc: Dennis Lewarch, Tribal Historic Preservation Officer, Suquamish Indian Tribe of the Port Madison Reservation

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February 12, 2020

The Honorable Teri Gobin Chairwoman Tulalip Tribes of Washington 6406 Marine Drive Tulalip, WA 98271

Subject: Sound Transit

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects and Archaeological Survey and Inventory Plan

SHPO Project Tracking Code: 2019-02-01457

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Regional Administrator

cc: Richard Young, Cultural Resources, Hibulb Cultural Center & Natural History Preserve, Tulalip Tribes of Washington

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

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February 12, 2020

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Subject: Sound Transit

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SHPO Project Tracking Code: 2019-02-01457

# Dear Chairman Goudy:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation with your Tribe under Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter requests comments on the proposed Area of Potential Effects (APE) and the proposed Archaeological Survey and Inventory Plan.

## **Project Description**

The Project would extend Link light rail service approximately 11.8 miles from Downtown Seattle to both West Seattle and Ballard (see enclosed Project Vicinity Maps). The Project includes light rail guideway with elevated, at-grade, and tunnel profiles. It also includes 14 stations that would either be elevated, at-grade, or in a tunnel. The stations would serve the following areas in Seattle: Alaska Junction, Avalon, Delridge, SODO, the sports stadiums, Chinatown/International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

# **Definition of APE**

As shown on the enclosed APE Map Set, the proposed APE generally extends from elements of the Project alternatives (e.g., guideway, station locations, and construction staging areas) to the nearest tax parcel or a maximum of 200 feet where large tax parcels are adjacent to Project elements. One parcel is a standard APE extent for linear transportation projects, because potential direct and indirect effects to historic properties typically do not extend beyond one parcel. The APE is larger in the following areas, to account for potential visual effects:

- Salmon Bay, where some Project alternatives include a high-level fixed bridge, the APE extends 0.25 mile from the center of the proposed high-level bridges at 14th Avenue NW and 15th Avenue NW. It also extends to parcels on the southwest side of the Ballard Bridge (between 21st Avenue West and the shoreline, north of West Nickerson Street) and includes all of Fishermen's Terminal.
- SW Genesee Street between 26th Avenue SW and 30th Avenue SW, where one Project alternative includes high guideway height, the APE extends to two parcels to the north of SW Genesee Street.
- SODO, where some of the Project alternatives would reconstruct South Holgate Street and South Lander Street to cross over the existing and proposed light rail alignments, the APE extends one additional parcel from the guideway.

# Archaeological Survey and Inventory Plan

FTA and Sound Transit will identify potential direct and indirect effects of the Project on historic built environment and archaeological resources within the APE that are listed on, or determined eligible for, the National Register of Historic Places (NRHP). This effort will include previously recorded NRHP-listed or -eligible resources, as well as those identified during archaeological and historic built environment resources survey and inventory.

The proposed Archaeological Survey and Inventory Plan (Plan) is enclosed, for your review. The Plan describes the proposed archaeological inventory process that would be conducted to identify and assess the potential for intact archaeological deposits. Due to limitations on access, such as property ownership, physical inaccessibility, or other reasons, FTA and Sound Transit propose the following phased approach to the investigation:

- Phase 1, Draft Environmental Impact Statement (EIS): The first phase would occur during preparation of the Draft EIS. This phase includes archaeological monitoring of geotechnical borings and geo-archaeological surveys where access is available.
- **Phase 2, Final EIS:** The second phase would occur during preparation of the Final EIS. It would focus on the Preferred Alternative and would include pedestrian surveys, near-surface surveys, and geo-archaeological surveys if access to property becomes available.
- Phase 3, Final Design: The third phase would occur during Project final design, after
  publication of the Final EIS and Record of Decision. As property is acquired prior to
  construction, hand exploration strategies, geo-archaeological survey, and mechanical
  excavation would occur.
- **Phase 4, Construction:** The fourth phase would occur during Project construction. This would include archaeological monitoring of construction activities in areas that were inaccessible before construction because of physical obstructions or other constraints.

# **Request for Comment**

Pursuant to 36 CFR Part 800, FTA invites your comments on the proposed APE and the Archaeological Survey and Inventory Plan within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam, FTA, at (206) 220-4465 or mark.assam@dot.gov, or Alex Stevenson, Sound Transit, at (206) 553-3655 or alex.stevenson@soundtransit.org.

Thank you for your consultation on the Project.

Sincerely,

Thurst U Educ

Linda M. Gehrke

Regional Administrator

cc: Kate Valdez, Tribal Historic Preservation Officer, Confederated Tribes and Bands of the Yakama Nation

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: West Seattle and Ballard Link Extensions Vicinity Map

Area of Potential Effects (APE) for the Sound Transit West Seattle and Ballard

Link Extensions (November 2019)

Archaeological Survey and Inventory Plan - Phase 1, January 2020



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

February 12, 2020

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

Subject: Sound Transit

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects and Archaeological Survey and Inventory Plan

SHPO Project Tracking Code: 2019-02-01457

Dear Dr. Brooks:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation with the Washington State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter requests comments on the proposed Area of Potential Effects (APE) and the proposed Archaeological Survey and Inventory Plan.

# **Project Description**

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# **Request for Comment**

Pursuant to 36 CFR Part 800, FTA invites your comments on the proposed APE and the Archaeological Survey and Inventory Plan within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam, FTA, at (206) 220-4465 or mark.assam@dot.gov, or Alex Stevenson, Sound Transit, at (206) 553-3655 or alex.stevenson@soundtransit.org.

Thank you for your consultation on the Project.

Sincerely,

Muult a when

Linda M. Gehrke

Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: West Seattle and Ballard Link Extensions Vicinity Map

Area of Potential Effects (APE) for the Sound Transit West Seattle and Ballard

Link Extensions (November 2019)

Archaeological Survey and Inventory Plan - Phase 1, January 2020

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February 20, 2020 Honorable Cecile Hansen Tribal Chair Duwamish Tribe 4708 W Marginal Way SW Seattle, WA 98106

Subject: Sound Transit West Seattle and Ballard Link Extensions Project, National Historic Preservation Act, Section 106 Area of Potential Effect and Archaeolgoical Survey and Inventory Plan SHPO Project Tracking Code 2019-02-01457

#### Dear Chairwoman Hansen:

I am writing this letter to the Duwamish Tribe on behalf of Sound Transit's Tribal Relations Program and the West Seattle and Ballard Link Extensions Project (Project). As you are aware, in February of 2018 Sound Transit invited the Duwamish to be a participating party in the environmental review and Section 106 process for the Project (please see the attached Project engagement information). This letter is a continuation of the engagement on the project intitiated in 2018.

This letter is to follow up in order to provide you with updated project specific information and includes:

- 1) A definition of the Area of Potential Effects (APE) (please see description below and documents included on the enclosed CD); and
- 2) A Cultural Resources Survey and Inventory plan focused on archaeological investigation that outlines a phased approach for cultural resources investigation (included on enclosed CD).

# **Definition of APE**

The Federal Transit Administration has define the APE consistent with 36 CFR 800.16(d), the APE represents the area within which the undertaking may "directly or indirectly cause alternations in the character or use of historic properties, if such properties exist." As shown in the enclosed APE Figure, the APE generally extends from the project elements (e.g., guideway, station locations, and construction staging areas) to the nearest tax parcel or a maximum of 200 feet where large tax parcels are adjacent to project elements One parcel is a standard APE extent for transportation projects, because indirect effects to historic properties typically do not extend beyond one parcel. The APE is larger in the following areas to account for potential visual effects:

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Tacoma Mayor

# CHIEF EXECUTIVE OFFICER Peter M. Rogoff

• SODO, where some of the Project alternatives would reconstruct South Holgate Street and South Lander Street to cross over the existing and proposed light rail alignments, the APE extends one additional parcel from the guideway

If there are any questions about this transmittal, or if you would like information on the project schedule, please contact me:

Dezerae Hayes – Sound Transit's Director of Tribal Relations by phone at: 253-509-3806 or via email at: Dezerae.hayes@soundtransit.org. You may also contact Alex Stevenson - Sound Transit's Cultural Resource Manager by phone: 206-553-3655 or via email at: <u>Alex.stevenson@soundtransit.org</u>.

Thank you in advance for your collaboration.

Sincerely,

Dezerae Hayes Director of Tribal Relations

Enclosure: West Seattle and Ballard Link Extension Project Cultural Resource Suvey Plan - CD

cc: Alexander Stevenson, Sound Transit Erin Green, Sound Tranit Lauren Swift, Sound Transit



February 20, 2020 Tribal Chair Snohomish Tribe 9792 Edmonds Way #267 Edmonds, WA 98020

Subject: Sound Transit West Seattle and Ballard Link Extensions Project, National Historic Preservation Act, Section 106 Area of Potential Effect and Archaeolgoical Survey and Inventory Plan SHPO Project Tracking Code 2019-02-01457

Dear Tribal Chair:

I am writing this letter to the Snohomish Tribe on behalf of Sound Transit's Tribal Relations Program and the West Seattle and Ballard Link Extensions Project (Project). As you are aware, in February of 2018 Sound Transit invited the Duwamish to be a participating party in the environmental review and Section 106 process for the Project (please see the attached Project engagement information). This letter is a continuation of the engagement on the project intitiated in 2018.

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# CHIEF EXECUTIVE OFFICER

Peter M. Rogoff

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Thank you in advance for your collaboration.

Sincerely,

Dezerae Hayes Director of Tribal Relations

Enclosure: West Seattle and Ballard Link Extension Project Cultural Resource Suvey Plan - CD

cc: Alexander Stevenson, Sound Transit Erin Green, Sound Tranit Lauren Swift, Sound Transit



February 25, 2020

Ms. Linda Gehrke Regional Administrator Federal Transit Administration 915 Second Avenue Suite 3142 Seattle, WA. 98174-1002

In future correspondence please refer to: Project Tracking Code: 2019-02-01457

Property: King County\_West Seattle to Ballard Light Rail Extension

Re: APE Concur

Dear Ms. Gehrke:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. In response, we have reviewed your description and map of the area of potential effect (APE).

We concur with your definition of the APE. We have also reviewed your methodology for the archaeological inventory. At this time we have no comments on the archaeological inventory methodology. However, DAHP is requesting that FTA provide the methodology for the built environment inventory efforts as well as a discussion on how these inventory efforts articulate to the phased approach of this project. Also, please provide any correspondence or comments from concerned tribes and/or other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Should additional information about the project become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw Transportation Archaeologist (360) 586-3085 dennis.wardlaw@dahp.wa.gov



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From: Assam, Mark (FTA)

To: Wardlaw, Dennis (DAHP)

Cc: Witmer, John; Changhchien, Amy; Costanza, Ann; Barbara Bundy; Swift, Lauren; Green, Erin; Stevenson, Alex

Subject: RE: King County\_ West Seattle To Ballard Light Rail Extension\_ APE Concur (2019-02-01457)

**Date:** Tuesday, April 21, 2020 4:38:38 PM

Attachments: WSBLE 106 Built Environment Inventory 20200408.pdf

**CAUTION:** This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Hi Dennis,

As you requested in your February 25, 2020 letter, attached is the Built Environment Inventory Plan for the West Seattle and Ballard Link Extensions Project for Sound Transit (Project Tracking Code: 2019-02-01457). Please let me know if you have comments or questions.

Thanks,

## Mark A. Assam, AICP

U.S. Department of Transportation Federal Transit Administration, Region X 915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002 (206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

**From:** Wardlaw, Dennis (DAHP) [mailto:dennis.wardlaw@dahp.wa.gov]

**Sent:** Tuesday, February 25, 2020 3:53 PM **To:** Assam, Mark (FTA) < Mark. Assam@dot.gov>

**Cc:** Laura Murphy (laura.murphy@muckleshoot.nsn.us) <laura.murphy@muckleshoot.nsn.us>; Steven Mullen-Moses <steve@snoqualmietribe.us>; Richard Young (ryoung@tulaliptribes-nsn.gov) <ryoung@tulaliptribes-nsn.gov>; 'Kerry Lyste' (klyste@stillaguamish.com)

<klyste@stillaguamish.com>; johnson@yakama.com; kate@yakama.com; Gehrke, Linda (FTA)
<Linda.Gehrke@dot.gov>; Stevenson, Alex <alex.stevenson@soundtransit.org>; Dennis Lewarch
(dlewarch@Suquamish.nsn.us) <dlewarch@Suquamish.nsn.us>; Borth, Holly (DAHP)
<holly.borth@dahp.wa.gov>

Subject: King County\_ West Seattle To Ballard Light Rail Extension\_ APE Concur (2019-02-01457)

Hi Mark,

Good afternoon. Attached please find our letter for the project referenced in the subject line. Please let me know if you have any questions.

Regards, Dennis Dennis Wardlaw, M.A. Transportation Archaeologist Dept. of Archaeology and Historic Preservation 1110 Capitol Way South, Suite 30 Olympia, WA 98501

Voice: 360-586-3085 Cell: 360-485-5014



please consider the environment before printing this email

 From:
 Wardlaw, Dennis (DAHP)

 To:
 Assam, Mark (FTA)

Cc: Witmer, John; Changhchien, Amy; Costanza, Ann; Barbara Bundy; Swift, Lauren; Green, Erin; Stevenson, Alex

Subject: RE: King County\_ West Seattle To Ballard Light Rail Extension\_ APE Concur (2019-02-01457)

**Date:** Thursday, April 23, 2020 6:33:00 AM

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Hi Mark,

Thanks for sending this over. The BEU has reviewed the Inventory Plan and are in agreement with built environment methodology.

Regards, Dennis

From: Assam, Mark (FTA) < Mark. Assam@dot.gov>

**Sent:** Tuesday, April 21, 2020 4:38 PM

To: Wardlaw, Dennis (DAHP) <dennis.wardlaw@dahp.wa.gov>

**Cc:** Witmer, John (FTA) <John.Witmer@dot.gov>; Changchien, Amy (FTA)

<Amy.Changchien@dot.gov>; Ann Costanza <acostanza@anchorqea.com>; Barbara Bundy

<bbundy@anchorqea.com>; Swift, Lauren <lauren.swift@soundtransit.org>; Green, Erin
<erin.green@soundtransit.org>; Stevenson, Alex <alex.stevenson@soundtransit.org>

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Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Wardlaw, Dennis (DAHP) [mailto:dennis.wardlaw@dahp.wa.gov]

**Sent:** Tuesday, February 25, 2020 3:53 PM **To:** Assam, Mark (FTA) < <u>Mark.Assam@dot.gov</u>>

**Cc:** Laura Murphy (<u>laura.murphy@muckleshoot.nsn.us</u>) < <u>laura.murphy@muckleshoot.nsn.us</u>>;

Steven Mullen-Moses < <a href="mailto:steve@snoqualmietribe.us">steven Mullen-Moses < <a href="mailto:steve@snoqualmietribe.us">steve@snoqualmietribe.us</a>>; Richard Young (<a href="mailto:ryoung@tulaliptribes-nsn.gov">ryoung@tulaliptribes-nsn.gov</a>)

<ryoung@tulaliptribes-nsn.gov>; 'Kerry Lyste' (klyste@stillaguamish.com)

<<u>klyste@stillaguamish.com</u>>; <u>iohnson@yakama.com</u>; <u>kate@yakama.com</u>; Gehrke, Linda (FTA)

<<u>Linda.Gehrke@dot.gov</u>>; Stevenson, Alex <<u>alex.stevenson@soundtransit.org</u>>; Dennis Lewarch

(<u>dlewarch@Suquamish.nsn.us</u>) < <u>dlewarch@Suquamish.nsn.us</u>>; Borth, Holly (DAHP)

<holly.borth@dahp.wa.gov>

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Regards, Dennis

Dennis Wardlaw, M.A.
Transportation Archaeologist
Dept. of Archaeology and Historic Preservation
1110 Capitol Way South, Suite 30
Olympia, WA 98501

Voice: 360-586-3085 Cell: 360-485-5014



From: Assam, Mark (FTA)

To: Wardlaw, Dennis (DAHP)

Cc: Swift, Lauren; Green, Erin; Stevenson, Alex; Witmer, John; Changhchien, Amy; Costanza, Ann; Barbara Bundy

Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - HPI Forms Review

**Date:** Tuesday, April 21, 2020 4:45:57 PM

Attachments: DAHP Review Matrix Batches 1, 2, 3 April 2020.xlsx

WSBLE HPI Maps 2020 04 09RS.PDF

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Hi Dennis,

As part of our continuing efforts to coordinate closely with your office on the West Seattle and Ballard Link Extensions Project (SHPO Project Tracking Code: 2019-02-01457), Sound Transit has uploaded 376 historic property inventory (HPI) forms for properties within the Area of Potential Effects (APE) using Sound Transit's FTP site (see access instructions below). These forms were submitted in the following three files/batches:

- 1. WSBLE HPIs Batch 1 Updated 20200402RS (Ballard)
- 2. WSBLE HPIs Batch 2 Updated 20200402RS (Interbay)
- 3. WSBLE HPIs Batch 3 Updated 20200402RS (Lower Queen Anne)

The files can be accessed at the link below using the username and password shown below:

Link: <a href="ftp://ftp.soundtransit.org/temporary\_holding/WSBLE%20HPI/">ftp://ftp.soundtransit.org/temporary\_holding/WSBLE%20HPI/</a>

Username: TempHold Password: TempHold

As we discussed during our teleconference on March 13, 2020, I am attaching an Excel file for your use in reviewing and commenting on the HPI forms, as well as a map set showing the location of each historic property within the geographic "HPI batches" throughout the entire project corridor.

We request that you review the forms and comment on: (1) the level of documentation; and (2) the recommended determinations of eligibility. FTA will formally determine eligibility and effect for all historic properties within the APE later in the Section 106 process. The current coordination is intended to make sure that the documentation is consistent with your expectations.

Thank you for your assistance.

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915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 31, 2020

Riisa Conklin Executive Director Freeway Park Association 601 Union Street, Suite 310 Seattle, WA 98101

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Consulting Party Invitation** 

Dear Ms. Conklin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area, in Seattle, King County, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter invites your organization to participate in the Section 106 consultation process for the Project as a consulting party.

# **Project Description**

The Project would extend Link light rail service 11.8 miles from downtown Seattle to both West Seattle and Ballard (see enclosed Project Vicinity Maps). The Project includes light rail guideway with elevated, at-grade, and tunnel profiles. It also includes 14 stations that would either be elevated, at-grade, or in a tunnel. The stations would serve the following areas in Seattle: Alaska Junction, Avalon, Delridge, SODO, the sports stadiums, Chinatown/International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

# **Area of Potential Effects**

The Area of Potential Effects (APE) for the Project is illustrated in the enclosed APE Map Set. The APE includes all areas where ground disturbance may occur, including excavation, grading, curb removal, utilities, etc. The APE includes areas where stations, transit centers, and other improvements are planned. It also includes possible construction staging areas.

The APE also includes areas where the potential exists for historic properties to be indirectly affected by the Project. Where station construction, signal upgrades, and other highly visible improvements are planned, the APE extends on either side of the right-of-way to the nearest tax parcel, or to a maximum of 200 feet where large tax parcels are adjacent to Project elements. The APE is larger in the following areas, to account for potential visual effects:

- Salmon Bay, where some Project alternatives include a high-level fixed bridge, the APE extends 0.25 mile from the center of the proposed high-level bridges at 14th Avenue NW and 15th Avenue NW. It also extends to parcels on the southwest side of the Ballard Bridge (between 21st Avenue West and the shoreline, north of West Nickerson Street) and includes all of Fishermen's Terminal.
- SW Genesee Street between 26th Avenue SW and 30th Avenue SW, where one Project alternative includes high guideway height, the APE extends to two parcels to the north of SW Genesee Street.
- SODO, where some of the Project alternatives would reconstruct South Holgate Street and South Lander Street to cross over the existing and proposed light rail alignments, the APE extends one additional parcel from the guideway.

A survey for historic resources is currently underway to identify buildings, structures, sites, objects, and districts constructed in 1980 or earlier that are within the APE or on parcels crossed by the APE, and to assess their potential to be affected by the Project. Historic resources identified during the survey will be documented in the Washington Information System for Architectural and Archaeological Records Data (WISAARD) database, and evaluated for eligibility for listing on the National Register of Historic Places (NRHP).

An archaeological survey will also be conducted within the APE that includes a pedestrian survey and shovel testing to identify and assess the potential for intact archaeological deposits. Shovel testing will be focused where ground disturbance is planned in areas that have not been previously disturbed. Where archaeological high-probability areas identified within the APE cannot be tested prior to Project construction, archaeological monitoring during construction will be recommended.

# **Consulting Party Role**

FTA invites your organization to participate as a consulting party because you may have an interest in the Project and in its potential effects on historic and cultural properties. As you may know, Section 106 is a process that may not result in preservation in all instances but seeks to balance a full range of public values and perspectives to avoid, minimize, or mitigate adverse effects on historic properties. Consulting party status entitles you to comment on aspects of the Project that would potentially affect historic properties. As a consulting party, you would receive information about historic properties within the APE, and potential effects to those properties in

August 31, 2020 Page 3

which you may have an interest. Properties of interest include those buildings, structures, objects, sites, and districts that are either listed, or eligible for listing, on the NRHP.

If you elect to participate as a consulting party, please inform FTA of your decision and provide any comments on the APE within 30 days of receipt of this letter. Should you require additional information or have questions, please contact Mark Assam at 206-220-4465 or mark.assam@dot.gov.

Thank you for your interest in the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2020.08.31
18:21:20 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Project Vicinity Maps

Area of Potential Effects Map Set



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 31, 2020

Sarah Sodt City Historic Preservation Officer City of Seattle Historic Preservation Office P.O. Box 94649 Seattle, WA 98124-4649

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Consulting Party Invitation** 

Dear Ms. Sodt:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area, in Seattle, King County, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter invites your organization to participate in the Section 106 consultation process for the Project as a consulting party.

# **Project Description**

The Project would extend Link light rail service 11.8 miles from downtown Seattle to both West Seattle and Ballard (see enclosed Project Vicinity Maps). The Project includes light rail guideway with elevated, at-grade, and tunnel profiles. It also includes 14 stations that would either be elevated, at-grade, or in a tunnel. The stations would serve the following areas in Seattle: Alaska Junction, Avalon, Delridge, SODO, the sports stadiums, Chinatown/International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

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August 31, 2020 Page 3

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Thank you for your interest in the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2020.08.31
18:19:13 - 07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Project Vicinity Maps

Area of Potential Effects Map Set



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 31, 2020

Ryan Smith Principal Martin Smith, Inc. 1932 1st Avenue, Suite 1000 Seattle, WA 98101

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Consulting Party Invitation** 

Dear Mr. Smith:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area, in Seattle, King County, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter invites your organization to participate in the Section 106 consultation process for the Project as a consulting party.

# **Project Description**

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Thank you for your interest in the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2020.08.31 18:30:12-07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Project Vicinity Maps



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 31, 2020

Lisa Howard Executive Director Alliance for Pioneer Square P.O. Box 4507 Seattle, WA 98194

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Consulting Party Invitation** 

Dear Ms. Howard:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area, in Seattle, King County, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter invites your organization to participate in the Section 106 consultation process for the Project as a consulting party.

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Thank you for your interest in the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2020.08.31
18:16:30 -07'00'

Linda M. Gehrke Regional Administrator

 Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
 Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Project Vicinity Maps



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 31, 2020

Jennifer Meisner Preservation Officer King County Historic Preservation Program 201 South Jackson Street, Suite 700 Seattle, WA 98104

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Consulting Party Invitation** 

Dear Ms. Meisner:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area, in Seattle, King County, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter invites your organization to participate in the Section 106 consultation process for the Project as a consulting party.

## **Project Description**

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## **Consulting Party Role**

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Thank you for your interest in the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

Date: 2020.08.31
18:28:03 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Project Vicinity Maps



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 31, 2020

Kji Kelly Executive Director Historic Seattle 1117 Minor Avenue Seattle, WA 98101

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Consulting Party Invitation** 

Dear Mr. Kelly:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area, in Seattle, King County, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter invites your organization to participate in the Section 106 consultation process for the Project as a consulting party.

## **Project Description**

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Thank you for your interest in the Project.

Sincerely,

LINDA M by LINDA M GEHRKE

GEHRKE
Date: 2020.08.31
18:23:42-07'00'

Linda M. Gehrke Regional Administrator

 Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
 Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Project Vicinity Maps



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 31, 2020

Kathleen Barry Johnson Executive Director Historic South Downtown Community Preservation and Development Authority 409B Maynard Avenue South Seattle, WA 98107

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Consulting Party Invitation** 

Dear Ms. Barry Johnson:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area, in Seattle, King County, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter invites your organization to participate in the Section 106 consultation process for the Project as a consulting party.

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Thank you for your interest in the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

Date: 2020.08.31
18:25:41 - 07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Project Vicinity Maps



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 31, 2020

Chris Moore Executive Director Washington Trust for Historic Preservation 1204 Minor Avenue Seattle, WA 98101

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Consulting Party Invitation** 

Dear Mr. Moore:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area, in Seattle, King County, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter invites your organization to participate in the Section 106 consultation process for the Project as a consulting party.

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- Salmon Bay, where some Project alternatives include a high-level fixed bridge, the APE extends 0.25 mile from the center of the proposed high-level bridges at 14th Avenue NW and 15th Avenue NW. It also extends to parcels on the southwest side of the Ballard Bridge (between 21st Avenue West and the shoreline, north of West Nickerson Street) and includes all of Fishermen's Terminal.
- SW Genesee Street between 26th Avenue SW and 30th Avenue SW, where one Project
  alternative includes high guideway height, the APE extends to two parcels to the north of
  SW Genesee Street.
- SODO, where some of the Project alternatives would reconstruct South Holgate Street and South Lander Street to cross over the existing and proposed light rail alignments, the APE extends one additional parcel from the guideway.

A survey for historic resources is currently underway to identify buildings, structures, sites, objects, and districts constructed in 1980 or earlier that are within the APE or on parcels crossed by the APE, and to assess their potential to be affected by the Project. Historic resources identified during the survey will be documented in the Washington Information System for Architectural and Archaeological Records Data (WISAARD) database, and evaluated for eligibility for listing on the National Register of Historic Places (NRHP).

An archaeological survey will also be conducted within the APE that includes a pedestrian survey and shovel testing to identify and assess the potential for intact archaeological deposits. Shovel testing will be focused where ground disturbance is planned in areas that have not been previously disturbed. Where archaeological high-probability areas identified within the APE cannot be tested prior to Project construction, archaeological monitoring during construction will be recommended.

## **Consulting Party Role**

which you may have an interest. Properties of interest include those buildings, structures, objects, sites, and districts that are either listed, or eligible for listing, on the NRHP.

If you elect to participate as a consulting party, please inform FTA of your decision and provide any comments on the APE within 30 days of receipt of this letter. Should you require additional information or have questions, please contact Mark Assam at 206-220-4465 or mark.assam@dot.gov.

Thank you for your interest in the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2020.08.31 18:40:58 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Project Vicinity Maps



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 31, 2020

Julia Levitt Strategic Advisor Seattle Center 305 Harrison Street Seattle, WA 98109

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Consulting Party Invitation** 

Dear Ms. Levitt:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area, in Seattle, King County, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter invites your organization to participate in the Section 106 consultation process for the Project as a consulting party.

## **Project Description**

The Area of Potential Effects (APE) for the Project is illustrated in the enclosed APE Map Set. The APE includes all areas where ground disturbance may occur, including excavation, grading, curb removal, utilities, etc. The APE includes areas where stations, transit centers, and other improvements are planned. It also includes possible construction staging areas.

The APE also includes areas where the potential exists for historic properties to be indirectly affected by the Project. Where station construction, signal upgrades, and other highly visible improvements are planned, the APE extends on either side of the right-of-way to the nearest tax parcel, or to a maximum of 200 feet where large tax parcels are adjacent to Project elements. The APE is larger in the following areas, to account for potential visual effects:

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- SODO, where some of the Project alternatives would reconstruct South Holgate Street and South Lander Street to cross over the existing and proposed light rail alignments, the APE extends one additional parcel from the guideway.

A survey for historic resources is currently underway to identify buildings, structures, sites, objects, and districts constructed in 1980 or earlier that are within the APE or on parcels crossed by the APE, and to assess their potential to be affected by the Project. Historic resources identified during the survey will be documented in the Washington Information System for Architectural and Archaeological Records Data (WISAARD) database, and evaluated for eligibility for listing on the National Register of Historic Places (NRHP).

An archaeological survey will also be conducted within the APE that includes a pedestrian survey and shovel testing to identify and assess the potential for intact archaeological deposits. Shovel testing will be focused where ground disturbance is planned in areas that have not been previously disturbed. Where archaeological high-probability areas identified within the APE cannot be tested prior to Project construction, archaeological monitoring during construction will be recommended.

## **Consulting Party Role**

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If you elect to participate as a consulting party, please inform FTA of your decision and provide any comments on the APE within 30 days of receipt of this letter. Should you require additional information or have questions, please contact Mark Assam at 206-220-4465 or mark.assam@dot.gov.

Thank you for your interest in the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2020.08.31
18:32:50 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Project Vicinity Maps



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 31, 2020

Maiko Winkler-Chin Executive Director Seattle Chinatown International District Preservation and Development Authority P.O. Box 3302 Seattle, WA 98114

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Consulting Party Invitation** 

Dear Ms. Winkler-Chin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area, in Seattle, King County, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter invites your organization to participate in the Section 106 consultation process for the Project as a consulting party.

# **Project Description**

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## **Consulting Party Role**

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If you elect to participate as a consulting party, please inform FTA of your decision and provide any comments on the APE within 30 days of receipt of this letter. Should you require additional information or have questions, please contact Mark Assam at 206-220-4465 or mark.assam@dot.gov.

Thank you for your interest in the Project.

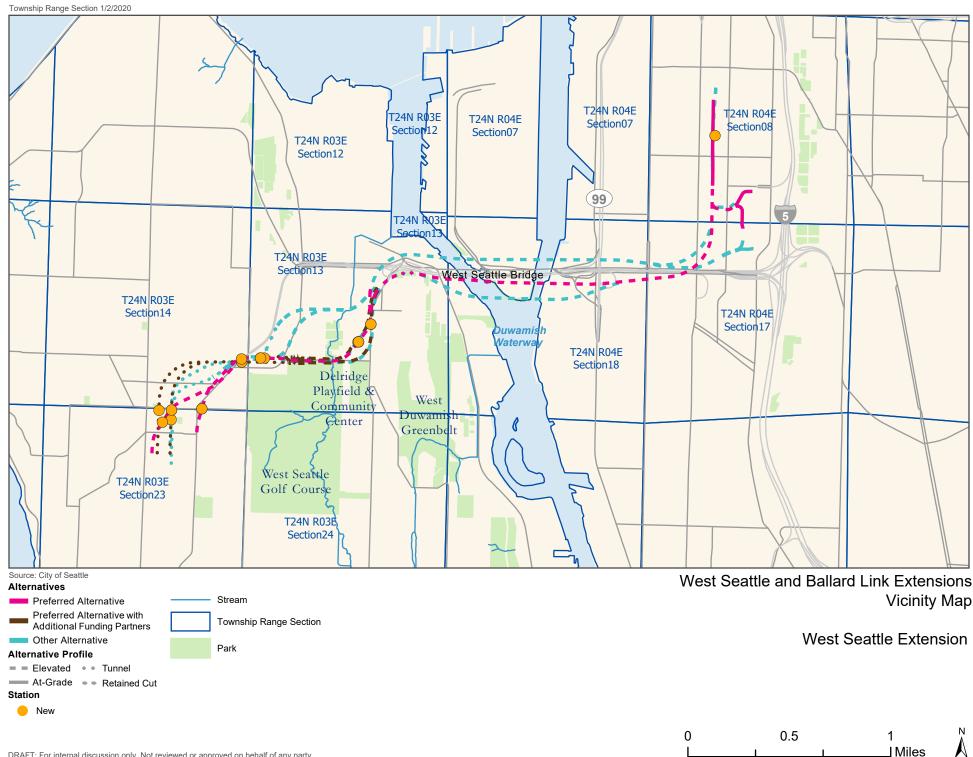
Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE
GEHRKE Date: 2020.08.31 18:35:22 -07'00'

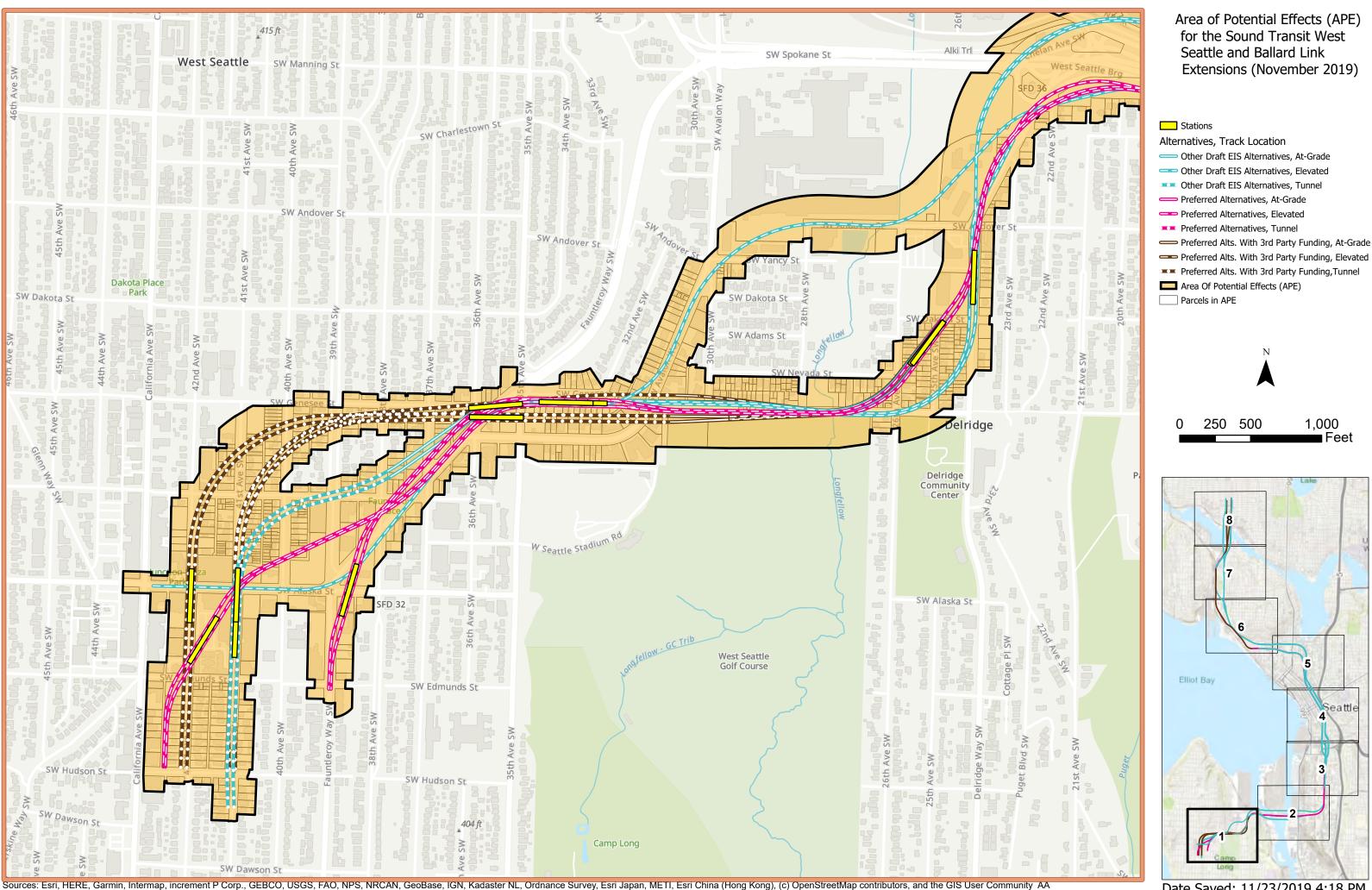
Linda M. Gehrke Regional Administrator

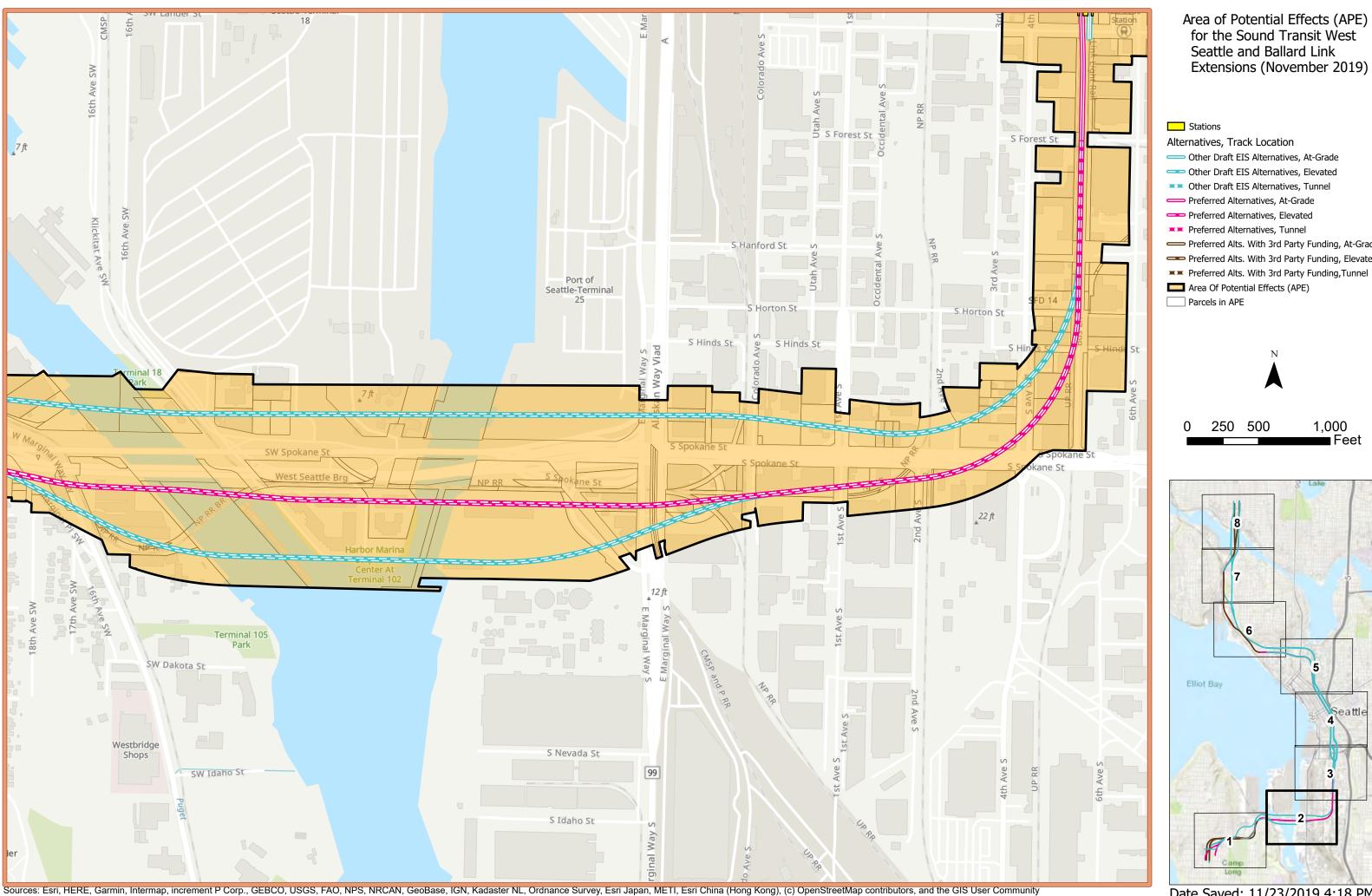
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
 Lauren Swift, Central Corridor Environmental Manager, Sound Transit
 Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Project Vicinity Maps







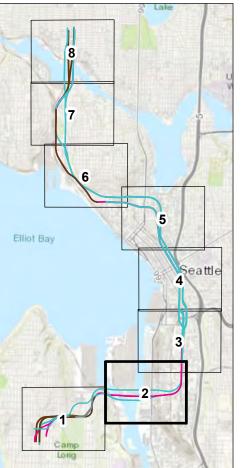


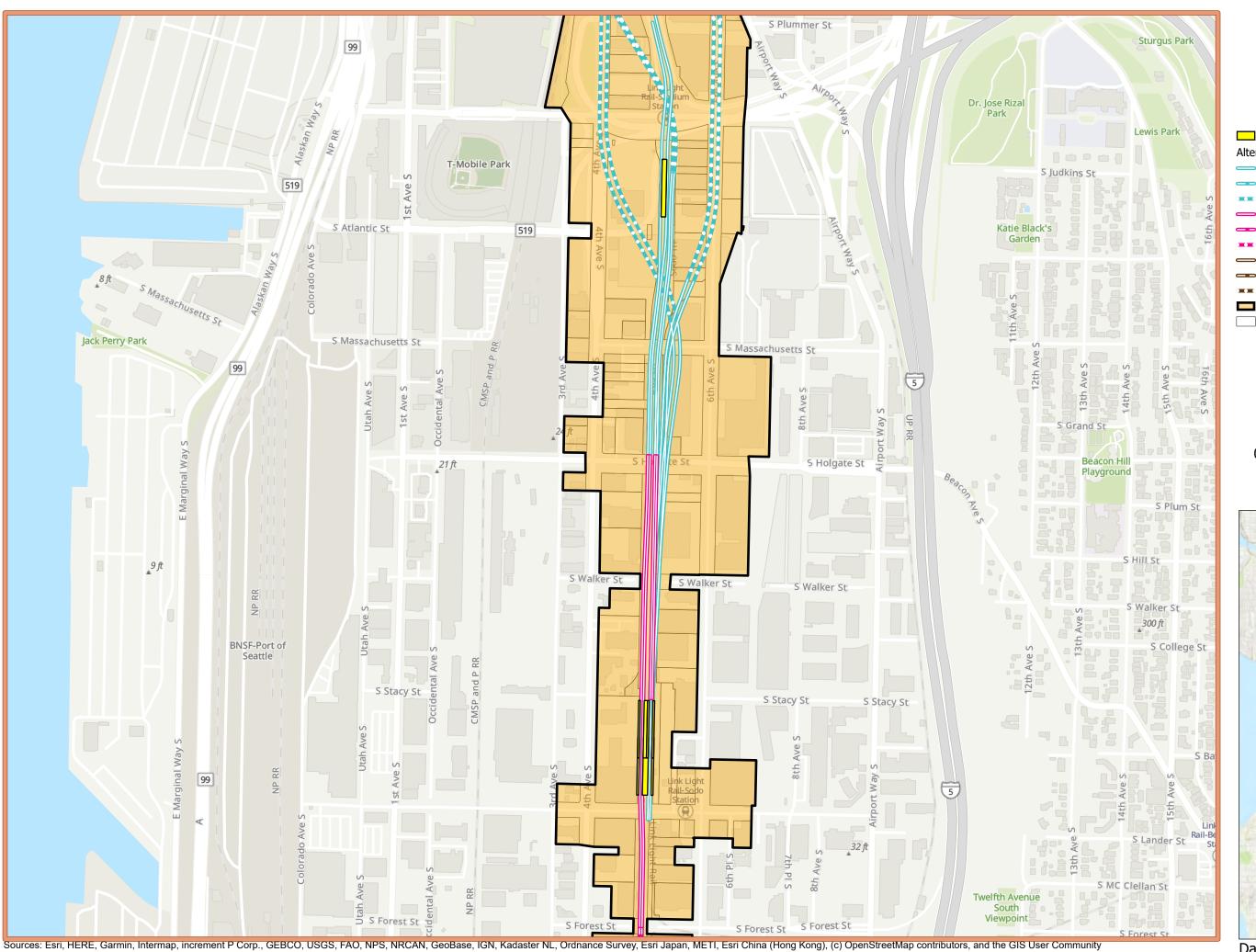
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- Other Draft EIS Alternatives, Tunnel

- Preferred Alts. With 3rd Party Funding, At-Grade
- Preferred Alts. With 3rd Party Funding, Elevated



1,000 Feet





Stations

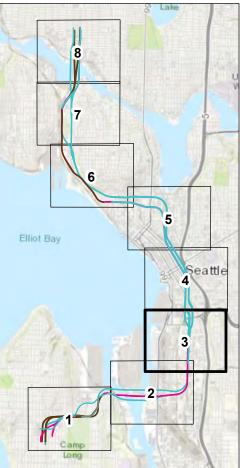
Alternatives, Track Location

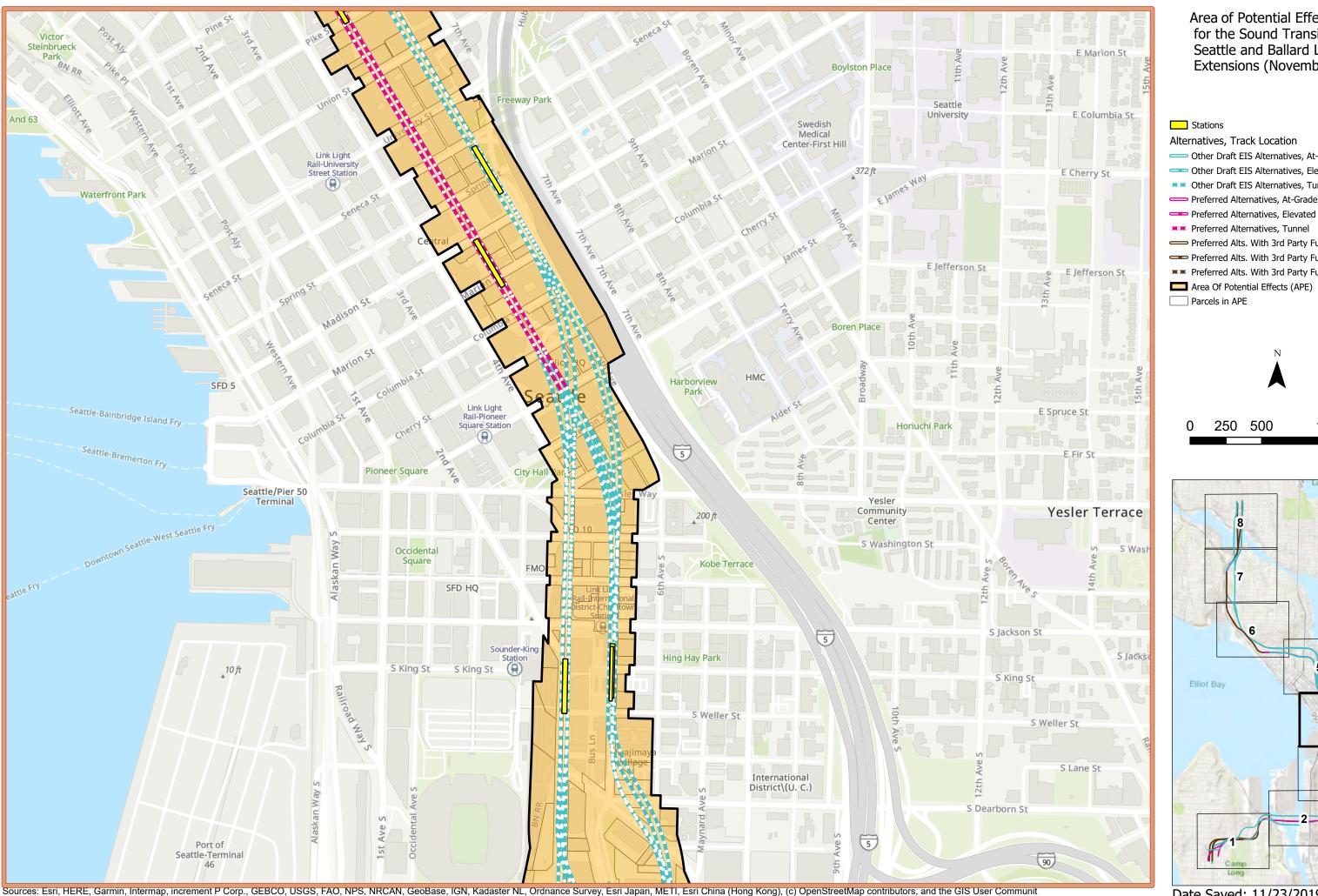
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- Preferred Alternatives, At-Grade
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  Preferred Alternatives, Tunnel
- Preferred Alts. With 3rd Party Funding, At-Grade
- Preferred Alts. With 3rd Party Funding, Elevated
- ■■ Preferred Alts. With 3rd Party Funding, Tunnel
- Area Of Potential Effects (APE)
- Parcels in APE



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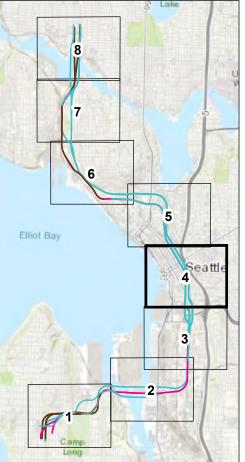
Stations

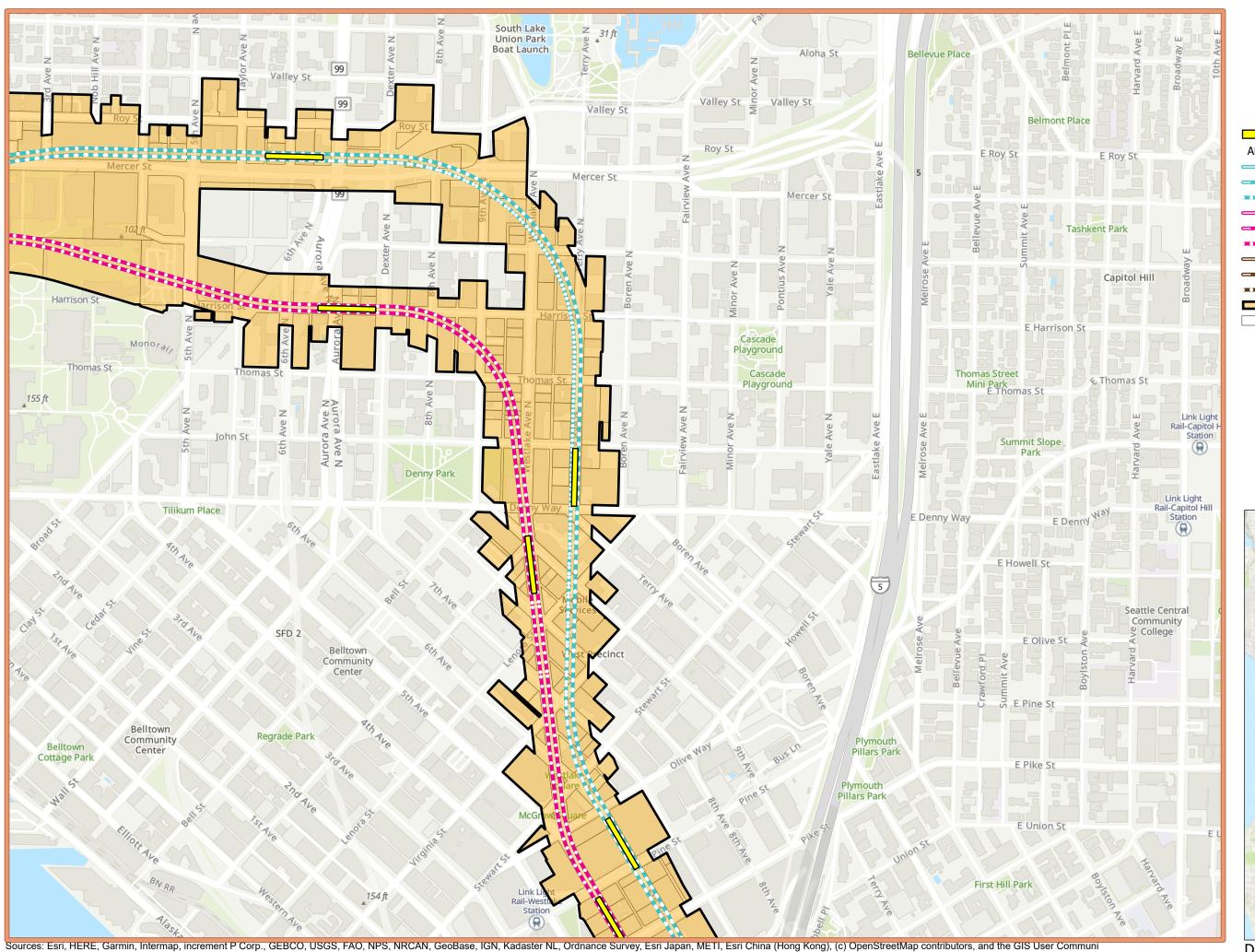
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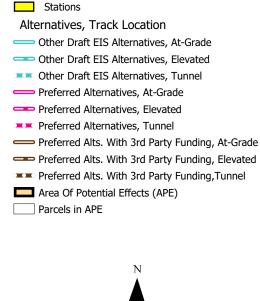
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1,000 250 500 Feet

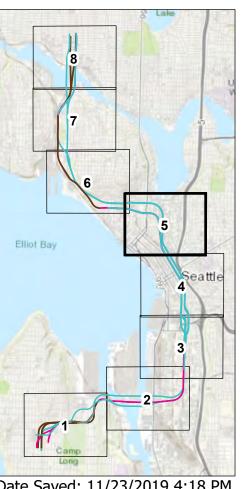




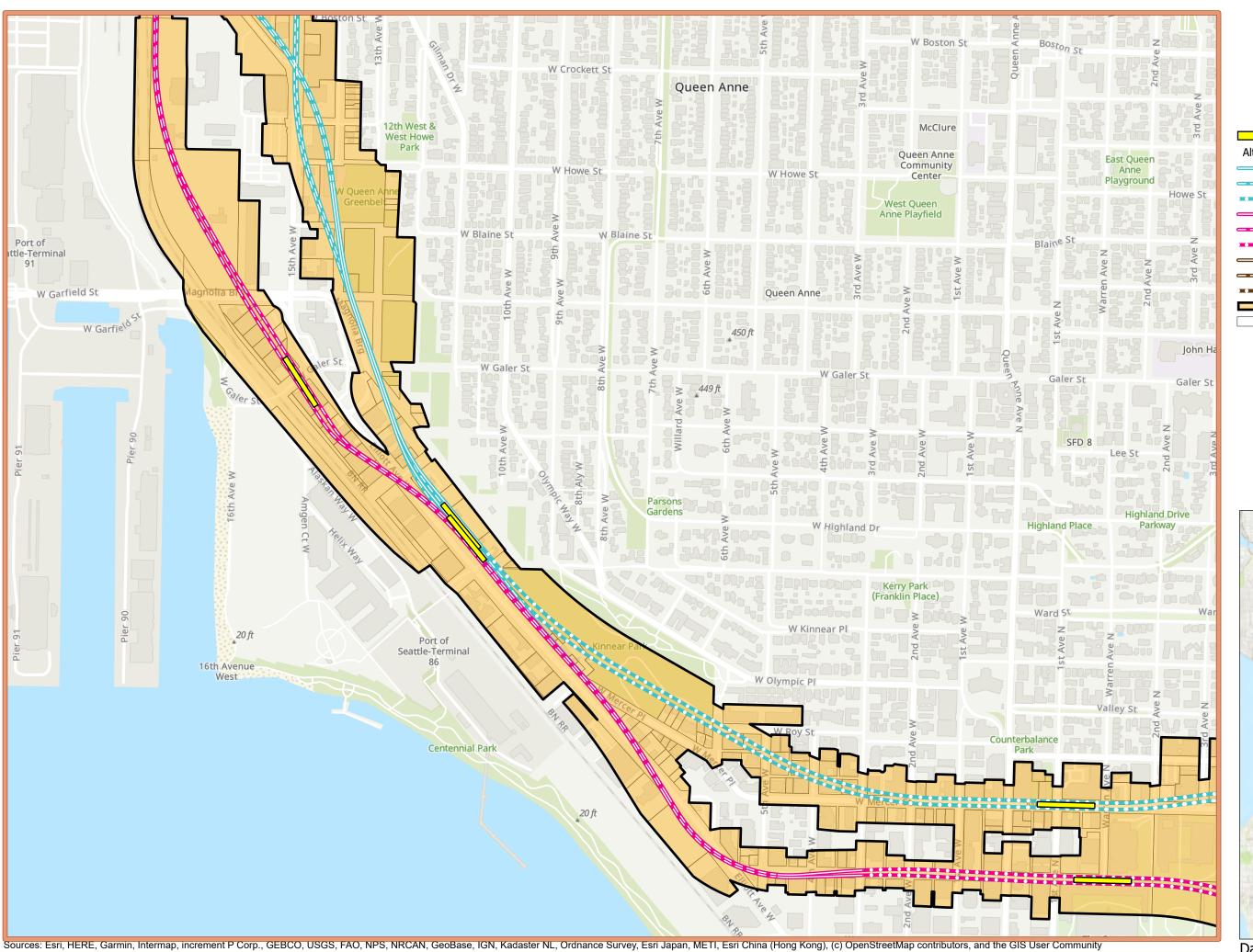


250 500

1,000 Feet



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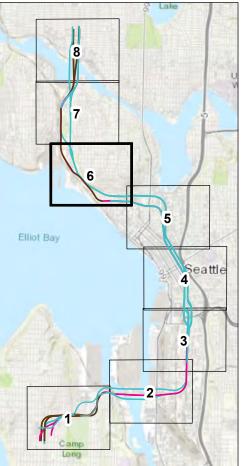
Stations

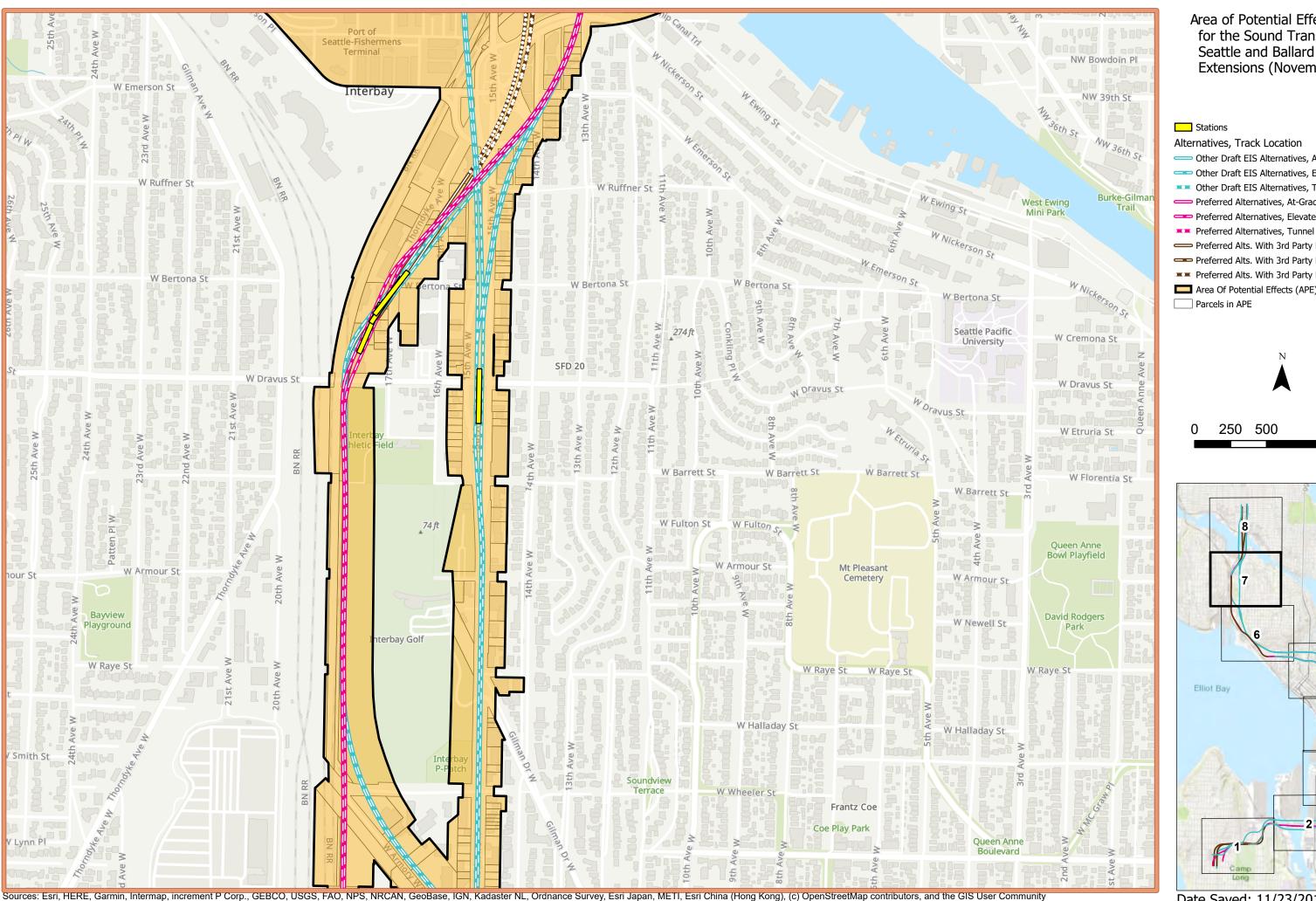
Alternatives, Track Location

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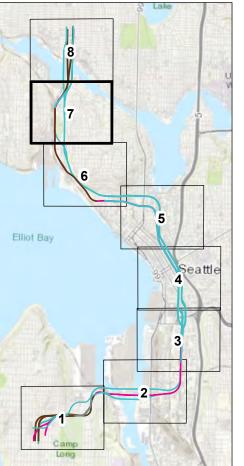
Stations

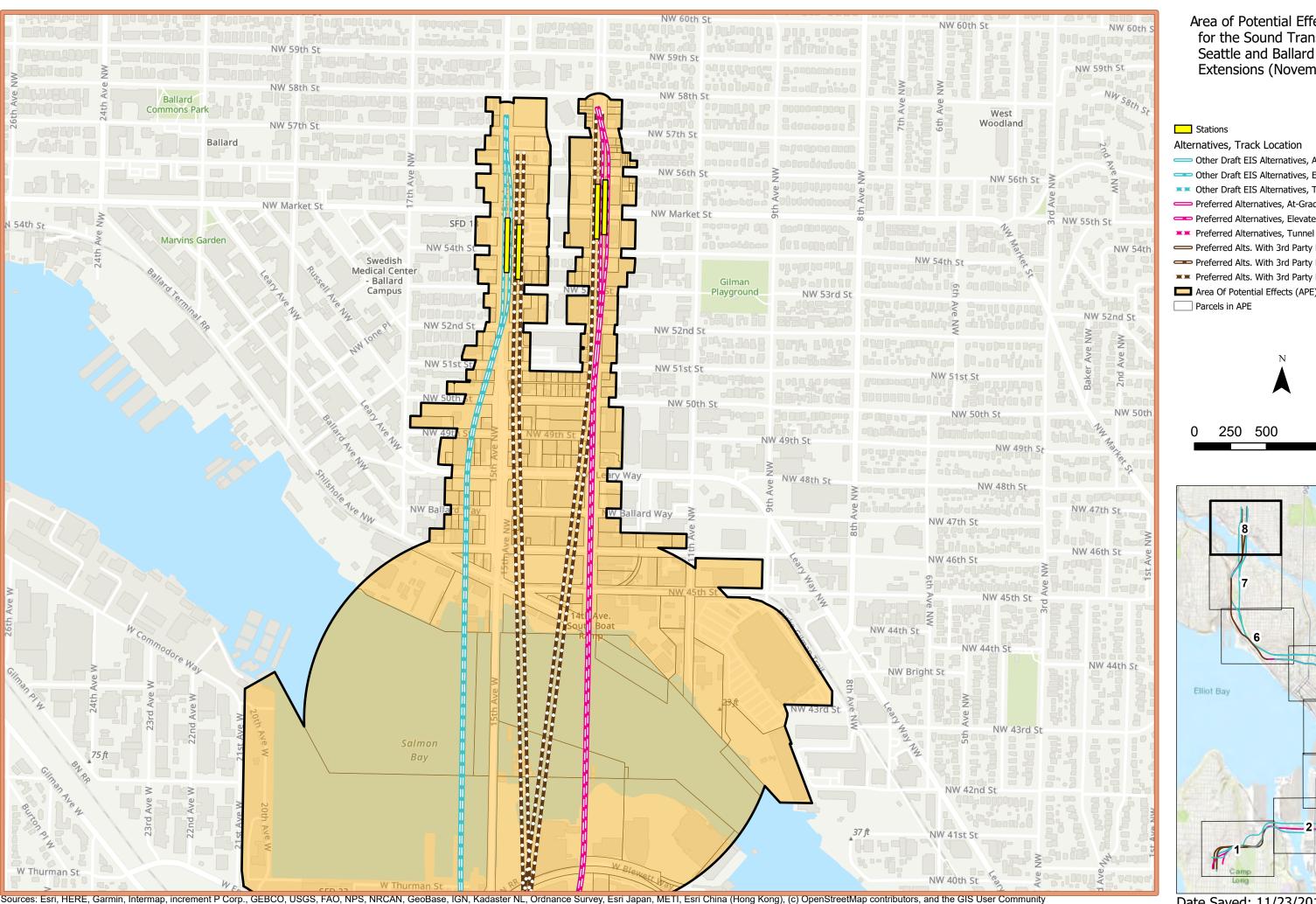
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1,000 250 500 Feet





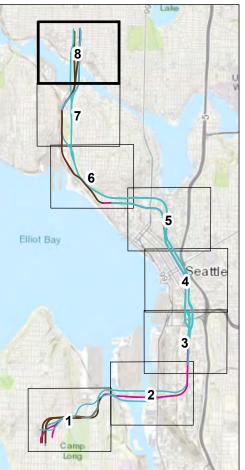
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- Preferred Alts. With 3rd Party Funding, Elevated
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- Area Of Potential Effects (APE)
- Parcels in APE



1,000 250 500 Feet



 From:
 Assam, Mark (FTA)

 To:
 Sodt, Sarah

Cc: Gurkewitz, Sandy; Costanza, Ann; Barbara Bundy; Swift, Lauren; Green, Erin; Stevenson, Alex; Wardlaw, Dennis

(DAHP); Witmer, John; Changhchien, Amy

Subject: RE: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party

Invitation

**Date:** Monday, September 14, 2020 4:08:57 PM

Attachments: <u>image001.png</u>

**CAUTION:** This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Hi Sarah,

Thank you for your response. To answer your question below, SHPO agreed with the definition of the APE without any comments. I look forward to getting any comments you may have.

Thanks,

#### Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

**From:** Sodt, Sarah [mailto:Sarah.Sodt@seattle.gov]

**Sent:** Monday, September 14, 2020 2:58 PM **To:** Assam, Mark (FTA) < Mark. Assam@dot.gov>

Cc: Gurkewitz, Sandra <Sandra.Gurkewitz@seattle.gov>

Subject: RE: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106

Consulting Party Invitation

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello Mark,

This is confirmation that I accept the invitation to be a consulting party. I will follow up with any comments on the APE that we have by the end of this month.

In the meantime, has DAHP submitted any comments on the APE? Thanks.

Sarah

# Sarah Sodt City Historic Preservation Officer

Office: 206.615.1786

Street Address: 600 4th Avenue - 4th Floor, Seattle WA 98104 Mailing Address: PO Box 94649, Seattle WA 98124-4649

seattle.gov/neighborhoods



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#### FAQS | BLOG | Request a Census Community Conversation for your group

Public Disclosure/Disclaimer Statement: Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

From: Assam, Mark (FTA) < Mark. Assam@dot.gov>

**Sent:** Tuesday, September 1, 2020 9:33 PM **To:** Sodt, Sarah <<u>Sarah.Sodt@seattle.gov</u>>

**Cc:** Wardlaw, Dennis (DAHP) < dennis.wardlaw@dahp.wa.gov>; Swift, Lauren

<a href="mailto:log"><a href="

**Subject:** Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Invitation

#### **CAUTION: External Email**

Dear Ms. Sodt:

Please see the attached Section 106 Consulting Party Invitation letter for the Sound Transit - West Seattle and Ballard Link Extensions Project.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

# Yellin, Michelle

From: Assam, Mark (FTA) <mark.assam@dot.gov>
Sent: Wednesday, September 23, 2020 3:14 PM

To: Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Witmer,

John

**Subject:** FW: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section

106 Consulting Party Invitation

**CAUTION:** This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

FYI...

#### Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Kji Kelly [mailto:kjik@historicseattle.org]
Sent: Wednesday, September 23, 2020 3:12 PM
To: Assam, Mark (FTA) <Mark.Assam@dot.gov>
Cc: Eugenia Woo <eugeniaw@historicseattle.org>

Subject: RE: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party

Invitation

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

#### Mark

Thanks again for the below. Historic Seattle would like to be a consulting party. Eugenia Woo, Historic Seattle's Director of Preservation Services will be our point of contact. She is cc'd to this email. Thanks.

Kji

Kji Kelly
Executive Director
Historic Seattle
1117 Minor Ave | Seattle, WA 98101
t: 206.622.6952 ext 223 | f: 206.622.1197
kjik@historicseattle.org | www.historicseattle.org



From: Assam, Mark (FTA) < <u>Mark.Assam@dot.gov</u>> Sent: Tuesday, September 1, 2020 9:31 PM

To: Kji Kelly <kjik@historicseattle.org>

**Cc:** Wardlaw, Dennis (DAHP) < <a href="mailto:dennis.wardlaw@dahp.wa.gov">dennis.wardlaw@dahp.wa.gov</a>>; Swift, Lauren < <a href="mailto:lauren.swift@soundtransit.org">lauren.swift@soundtransit.org</a>>; Green,

 $Erin < \underline{erin.green@soundtransit.org} > ; Stevenson, Alex < \underline{alex.stevenson@soundtransit.org} > ; Witmer, John (FTA)$ 

< <u>John.Witmer@dot.gov</u>>; Changchien, Amy (FTA) < <u>Amy.Changchien@dot.gov</u>>; Costanza, Ann

<acostanza@anchorqea.com>; Barbara Bundy <bbundy@anchorqea.com>; fta.tro10mail <fta.tro10mail@dot.gov>

Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Invitation

Dear Mr. Kelly:

Please see the attached Section 106 Consulting Party Invitation letter for the Sound Transit - West Seattle and Ballard Link Extensions Project.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

# Yellin, Michelle

From: Assam, Mark (FTA) <mark.assam@dot.gov>
Sent: Thursday, September 24, 2020 10:33 AM

To: Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Witmer,

John

**Subject:** FW: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section

106 Consulting Party Invitation

**CAUTION:** This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

FYI...

### Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

**From:** Jennifer Mortensen [mailto:jmortensen@preservewa.org]

**Sent:** Thursday, September 24, 2020 9:43 AM **To:** Assam, Mark (FTA) < Mark. Assam@dot.gov>

Subject: Re: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party

Invitation

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello Mark,

Apologies for the delay in response—the Washington Trust appreciates being invited to consult and looks forward to the ongoing conversation. I will be representing the Washington Trust in this process.

Thank you!

**Jennifer (Jay) Mortensen** | Outreach Director she / her / hers

Washington Trust for Historic Preservation 1204 Minor Avenue | Seattle, WA 98101 206-462-2999 (d) | o: 206-624-9449 (o)

preservewa.org

From: Assam, Mark (FTA) < Mark.Assam@dot.gov >

**Sent:** Tuesday, September 1, 2020 9:24 PM **To:** Chris Moore <cmoore@preservewa.org>

Cc: Wardlaw, Dennis (DAHP) <<u>dennis.wardlaw@dahp.wa.gov</u>>; Swift, Lauren <<u>lauren.swift@soundtransit.org</u>>; Green, Erin <<u>erin.green@soundtransit.org</u>>; Stevenson, Alex <<u>alex.stevenson@soundtransit.org</u>>; Witmer, John (FTA) <<u>John.Witmer@dot.gov</u>>; Changchien, Amy (FTA) <<u>Amy.Changchien@dot.gov</u>>; Costanza, Ann <<u>acostanza@anchorqea.com</u>>; Barbara Bundy <<u>bbundy@anchorqea.com</u>>; fta.tro10mail <<u>fta.tro10mail@dot.gov</u>>
Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Invitation

Dear Mr. Moore:

Please see the attached Section 106 Consulting Party Invitation letter for the Sound Transit - West Seattle and Ballard Link Extensions Project.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov



September 29, 2020 Submitted via email to: mark.assam@dot.gov

Linda Gehrke Regional Administrator USDOT Federal Transit Administration, Region X 915 Second Avenue Federal Building, Suite 3142 Seattle, WA 98174

Re: Invitation to participate as Consulting Party to Section 106 NHPA process for West Seattle and Ballard Link Extensions Project, and comments on the Area of Potential Effect

Dear Ms. Gehrke,

This letter is submitted on behalf of the Alliance for Pioneer Square, formally accepting the invitation to participate in the upcoming Section 106 consultation for the West Seattle to Ballard Link Extension Project ("WSBLE"). I, Lisa Howard, will serve as our organization's point of contact for this process.

Alliance for Pioneer Square also wishes to comment at this time on the proposed Area of Potential Effect (APE) provided in the maps distributed along with the consultation invitation letter dated August 31, 2020. We request that the Federal Transit Administration and Sound Transit expand the APE to include the following areas:

- The entirety of the Pioneer Square-Skid Road Historic District
- The entirety of the International Special Review District of the Seattle Chinatown International District neighborhood
- Potential haul routes for the West Seattle and Ballard Link Extension project

Pioneer Square is still in the midst of more than a decade of public mega projects, the impacts of which are comparable to the impacts that can be expected from WSBLE. These include the Alaskan Way Viaduct Replacement Project, the Elliott Bay Seawall Replacement Project, the Washington State Ferries Colman Dock expansion, construction of the First Hill Streetcar, and replacement of the water main under First Avenue. Based on our recent experience, we can assure you that the actual effects of WSBLE will include the entire Pioneer Square neighborhood, and given the location of WSBLE, it will affect the entire International District as well. Pioneer Square's ability to

withstand those mega projects has been in significant part a result of impact mitigation that those projects have provided under Section 106 of the National Historic Preservation Act, and we believe the same will be true for our ability to survive WSBLE.

During Section 106 review for many of the region's mega-projects (those whose overall cost exceeds \$1 billion, as defined by the Washington State Legislature), we have learned the importance of thoroughly investigating the area beyond the immediate construction footprint for potential impacts to historic resources, because the impact of the construction of these projects extends well beyond a construction fence.

Pioneer Square functions as an integrated neighborhood. Long-term maintenance of its historic resources depends upon its historic properties remaining economically viable. For the many properties with street level uses, that requires that customers be able to reach those uses, and that delivery trucks and customers be able to park when they get there. That depends on the transportation system. For properties with office uses in the upper floors, remaining economically viable requires that the employees of the tenants be able to get to work. That also depends on the transportation system. While Pioneer Square looks forward to the completion of WSBLE, with its transportation benefits for Pioneer Square as well as the rest of the region, if transportation to and from Pioneer Square becomes impossible or so arduous that no one chooses to come there for a decade, the risk of building foreclosures, lack of required maintenance, and destruction of the fabric of the historic neighborhood is very real.

The determination of the area of impact needs to consider the facts that:

- 1) On a good day, the neighborhood has serious access and traffic problems; on one of the ±100 days a year when there is an event in the stadium district during rush hour, it is worse.
- 2) Fourth and Fifth Avenues currently provide one of the major access routes to and from Pioneer Square, as well as through downtown Seattle for regional traffic; the WSBLE project will necessarily prevent full use of those streets for years.
- 3) There are limited ways that people and commercial vehicles (think trucks delivering art to galleries, food to restaurants, etc.) can get to and through the neighborhood at this time. Impairment of the major routes to and through the neighborhood, including Fourth and Fifth Avenues, will make that access much more challenging.
- 4) Many of the streets in Pioneer Square have historic areaways within the street right of way, which are part of the historic assets. The Seattle Department of Transportation has recently placed weight restrictions on most of the streets in Pioneer Square, including First Avenue and Jackson Street between Alaskan Way and Second Avenue. The City currently does not have a plan or a budget to repair the areaways, and as a result, those streets are unavailable for additional traffic to be diverted or detoured onto them.

The combination of these factors is the "existing environment" which WSBLE will be impacting. While no one expects construction of a major infrastructure project to be easy, and we recognize the need to accept considerable pain in order to get to the desired end, it is important to also recognize that if appropriate mitigation is not provided, such projects can do lasting damage to the fabric of the neighborhood. The impact of the construction of the existing transit tunnel under Third Avenue through downtown Seattle in the 1980s illustrates that point. A once-thriving Third Avenue business community was destroyed in the course of construction of the Third Avenue transit tunnel, and to this day Third Avenue struggles with high crime, a lack of long-term businesses at street level, streets that empty out at the close of the busines day, and areas that most people are warned to avoid. As we said in the beginning, Alliance for Pioneer Square worked hard in the Section 106 process for the Alaskan Way Viaduct Replacement, in particular, to avoid that consequence, and the mitigation provided through that Section 106 process has thus far prevented a similar fate for Pioneer Square. We hope to work with you to achieve a similar outcome with respect to WSBLE.

Several of the mega projects of the last decade have been located between Pioneer Square and Elliott Bay. WSBLE, by contrast, will be directly between two historic neighborhoods, and the impact of WSBLE on the Chinatown International District will be at least as substantial as the impact on Pioneer Square. Pioneer Square and the International District have also increasingly worked together to enhance pedestrian movement between the two historic districts, so that the parking, festivals, employment and street life of each benefit the other. Construction of WSBLE will potentially sever that connection for years, to the detriment of both. Maintenance of the historic resources within the Chinatown International District is also dependent upon maintaining the economic viability of the properties, so the threat to historic resources in the entire Chinatown International District from the construction impacts of WSBLE is also very real and the Sec. 106 process should be used to mitigate that threat.

Finally, the construction of a tunnel under more than 6,000 lineal feet of downtown Seattle will necessarily require hauling away an enormous amount of dirt, as well as bringing in an enormous amount of steel and concrete. In the very constrained transportation environment of downtown Seattle, it is critical that haul routes be included in the APE. That has precedent. For example, FHWA, WSDOT, and the DAHP concluded early in the process that it was necessary to include in the APE, potential haul routes identified for the SR 520 Bridge Replacement and HOV project. The long-term effects of heavy construction equipment and materials regularly traveling by historic properties warranted a closer look at the possible impacts generated by the project. Both Pioneer Square and Chinatown Historic Districts include historic areaways within their borders, resources that are at great risk of being lost to long term neglect and chronic underinvestment in maintenance and repair. Since many of these resources are located in the right of way, and sensitive to use and traffic, the increase in local traffic diversions and construction haul traffic may have substantial and long-term impacts.

Seattle is located in what many consider a transportation bottle neck in the region. The narrow strip of land between Elliot Bay and Lake Washington, dramatically divided by Interstate 5, has few entry and exit points to the Port of Seattle, and to downtown itself.

Pioneer Square and the Chinatown International District neighborhoods are located in one of the most important transportation confluence routes—with exits from I-5 to Dearborn and Yesler Avenues, and gateway-like entry to and exit from downtown Seattle via 4<sup>th</sup> Avenue South. These roadways are important transportation corridors for regional freight coming from Port of Seattle, and transit and traffic. When the WSBLE project is constructed, it will impact these transportation corridors, and potentially divert traffic through Pioneer Square and Chinatown International District. Years of noise, vibration, and dust could erode the overall cultural environments, and impact nearby historic properties. The two historic neighborhoods have been working to preserve the existing connectivity between them, and where practicable, to improve it while retaining their respective historic character. The anticipated decade-long construction of this project could have serious impacts to these neighborhood efforts, and warrant a more comprehensive look at the effects of construction on the neighborhoods as a whole.

We have the benefit of applied experience from our most recent regional megaprojects to support our requests. The SR 520 program in its tenth year of construction, with as many as eight to go, is continuing work on and alongside important resources like Lake Washington Boulevard, Foster Island, and the Roanoke Park Historic District. These resources were considered in the APE, only after consultation began. As stewards of the historic character and fabric of our neighborhood, we believe the precedent set by other regional projects to consider adjacent districts as a whole, and historic resources in close proximity to a project constrained by geography, is a prudent approach to historic preservation.

Thank you for your time and consideration. We look forward to discussing further, and to participating in this process with you.

Lisa Howard

Lisa Howard Executive Director Alliance for Pioneer Square

# Yellin, Michelle

From: Maiko WC <MaikoWC@scidpda.org>
Sent: Tuesday, September 29, 2020 11:42 AM

**To:** Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Witmer, John;

Changhchien, Amy; Costanza, Ann; Barbara Bundy; fta.tro10mail

Cc: Assam, Mark (FTA)

**Subject:** WSBLE - consulting party invitation / APE comments

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September 29, 2020

Submitted via email to: mark.assam@dot.gov

Linda Gehrke
Regional Administrator
USDOT Federal Transit Administration, Region
X
915 Second Avenue
Federal Building, Suite 3142
Seattle, WA 98174

Re: Consulting Party Invitation to Section 106 NHPA process for WSBLE Project

Area of Potential Effect Comments

Dear Ms. Gehrke:

Seattle Chinatown International District Preservation and Development Authority (SCIDpda) formally accepts the invitation to participate in the upcoming Section 106 consultation for the West Seattle to Ballard Link Extension Project. I will serve as our organization's point of contact for this process. This is a brand new process for myself, and I do not believe we have been asked to participate in Section 106 consultation for other projects in at least the last 10 years.

The SCIDpda was established 45 years ago by the City of Seattle as stewards of the Chinatown International District (CID) neighborhood – its people, its businesses, its public realm and those defining elements that make the neighborhood unique. We are not historic preservationists, but were established because investment in its preservation preserves its culture. It is from this perspective that we reviewed the Area of Potential Effect (APE) provided in the maps distributed along with the consultation invitation letter dated August 31, 2020, and request that FTA and Sound Transit expand the APE to include the following areas:

- The entirety of the Chinatown International District neighborhood, as defined by the City of Seattle
  under the International Special Review District (ISRD), which includes the National Register-listed Seattle
  Chinatown Historic District
- The entirety of the Pioneer Square-Skid Road Historic District
- Potential haul routes for the West Seattle and Ballard Link Extension project

We submit the following comments based on our review of the Area of Potential Effect (APE), provided in the maps distributed along with the consultation invitation letter dated August 31, 2020, and request that FTA and Sound Transit expand the APE to include the following areas:

- The entirety of the Seattle Chinatown International District neighborhood, as defined by the City of Seattle under the International Special Review District (ISRD), which includes the National Register-listed Seattle Chinatown Historic District
- The entirety of the Pioneer Square-Skid Road Historic District
- Potential haul routes for the West Seattle and Ballard Link Extension project

The CID has been dealing with changes to the use in the transit tunnel throughout the past 3 years, along with changes to traffic on 4th, 5th, and South Jackson Street, which followed close along on the construction of the City of Seattle's First Hill Street car and Charles Street Maintenance Center. Through our recent experience, we have learned that traffic impacts like diversion through our Chinatown International District neighborhood are more substantial on our economy and cultural fabric than disclosed or credited in environmental reviews to date. This neighborhood is made up of many generations of families and people that define the cultural context. We have a higher concentration of elderly (25% are 65+ in age) and people living in poverty (34% poverty rate) - as well as those that do not speak English as a first language (over 50%) - than the rest of Seattle. That context is visible on our sidewalks and in our parks where people congregate to play games, talk, and participate in daily life. Culturally, our community does not entertain at home, but instead tends to gather in public places. When traffic diversion pushes more cars through our streets, it creates tension between the calm pedestrian environment, and erodes our ability to congregate publicly. The conflict between people cutting through the neighborhood to get to somewhere – often quickly, often feeling annoyed – and people who live in the neighborhood – often elderly with a walker who moves slower than most – happens frequently. When projects take away parking and access to our streets, it prevents family from visiting their elders. Projects and traffic diversion make it more difficult for small businesses to receive deliveries, and for customers to access those businesses. As we've learned from neighboring Pioneer Square during the decades of megaproject construction in and around that neighborhood when travel to and from our community becomes so difficult or near impossible that people choose to avoid us, we lose businesses that contribute to our culture and economy, we risk the health of our seniors, and risk further deterioration of our buildings through lack of revenue to fund needed maintenance.

The SCIDpda also requests that the Bush Hotel and New Central Hotel buildings be included in the Section 106 review for the project.

Pioneer Square's ability to withstand more than a decade of public mega projects, including the Alaskan Way Viaduct Replacement Project, the Elliott Bay Seawall Replacement Project, the Washington State Ferries Colman Dock expansion, the First Hill Streetcar construction project, and First Avenue water main replacement, is in significant part a result of impact mitigation that those projects have provided under Section 106 of the National Historic Preservation Act.

During Section 106 review for many of the region's mega-projects (those whose overall cost exceeds \$1 billion, as defined by the Washington State Legislature), we have learned the importance of thoroughly investigating the area around the construction footprint for potential impacts to historic resources. Long term infrastructure projects in the Seattle area, with construction timelines beyond five years' time, come with extended long-term impacts to resources that live outside a construction fence.

For example, FHWA, WSDOT, and the DAHP concluded early in the process that it was necessary to include in the APE, potential haul routes identified for the SR 520 Bridge Replacement and HOV project. The long-term effects of heavy construction equipment and materials regularly traveling by historic properties warranted a closer look at the possible impacts generated by the project. Both Chinatown Historic District and Pioneer Square include historic areaways within their borders in the right-of-way, resources that are at great risk of being lost to long term neglect and chronic underinvestment in maintenance and repair. The increase in local traffic diversions and construction haul traffic may have substantial and long-term impacts on the areaways and foundations of historic buildings.

Seattle is located in what many consider a transportation bottle neck in the region. The narrow strip of land between Elliot Bay and Lake Washington, dramatically divided by Interstate 5, has few entry and exit points to the Port of Seattle, and to downtown itself. Pioneer Square and the Chinatown International District neighborhoods are located in one of the most important transportation confluence routes—with exits from I-5 to Dearborn and Yesler Avenues, and

gateway-like entry to and exit from downtown Seattle via 4<sup>th</sup> Avenue South. The CID, in addition, is surrounded by prior large transportation projects, with the confluence of rail and transit at the Jackson Hub on the west, I-90 to the south, and I-5 cutting through the neighborhood to the east.

These roadways are important transportation corridors for regional freight coming from Port of Seattle, and transit and traffic. When the WSBLE project is constructed, it will impact these transportation corridors, and potentially divert traffic through the Chinatown International District and Pioneer Square. Years of noise, vibration, and dust could erode the overall cultural environments, and impact nearby historic properties. The two historic neighborhoods have been working to preserve the existing connectivity between them, and where practicable, to improve it while retaining their respective historic character. The anticipated decade-long construction of this project could have serious impacts to these neighborhood efforts, and warrant a more comprehensive look at the effects of construction on the neighborhoods as a whole.

We have the benefit of applied experience from our most recent regional megaprojects to support our requests. The SR 520 program in its tenth year of construction, with as many as eight to go, is continuing work on and alongside important resources like Lake Washington Boulevard, Foster Island, and the Roanoke Park Historic District. These resources were considered in the APE, only after consultation began. As stewards of the historic character and fabric of our neighborhood, we believe the precedent set by other regional projects to consider adjacent districts as a whole, and historic resources in close proximity to a project constrained by geography, is a prudent approach to historic preservation.

Thank you for your time and consideration. We look forward to discussing further, and to participating in this process with you.

Maiko Winkler-Chin Executive Director Seattle Chinatown International District Preservation and Development Authority

#### Maiko Winkler-Chin

**Executive Director** 

Seattle Chinatown International District Preservation & Development Authority

phone: 206.838.8242

Working... M/W/F in office from 9-5; T/Th from home 9-5

www.scidpda.org



The pda's mission is to preserve, promote and develop the Seattle Chinatown International District as a vibrant community and unique ethnic neighborhood

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September 29, 2020

Submitted via email to: mark.assam@dot.gov

Linda Gehrke Regional Administrator USDOT Federal Transit Administration, Region X 915 Second Avenue Federal Building, Suite 3142 Seattle, WA 98174

Re: Invitation to participate as Consulting Party to Section 106 NHPA process for West Seattle and Ballard Link Extensions Project, and comments on the Area of Potential Effect

Dear Ms. Gehrke and Mr. Assam,

This letter is submitted on behalf of Historic South Downtown, a Community Preservation and Development Authority formed under RCW 43.167 to assist the communities of Pioneer Square and Chinatown-International District (C-ID) in mitigating the impact of large-scale public developments. This letter represents our formal acceptance of the invitation to participate in the upcoming Section 106 consultation for the West Seattle to Ballard Link Extension Project ("WSBLE").

Please note, send all future correspondence to Kathleen Johnson via email at kathleen@historicsouthdowntown.org.

We reviewed the Area of Potential Effect (APE) provided in the maps distributed along with the consultation invitation letter received in the evening hours of September 1, 2020, and request that FTA and Sound Transit expand the APE to include the following areas:

- The entirety of the Pioneer Square-Skid Road Historic District
- The entirety of the International Special Review District of the Seattle Chinatown International District neighborhood
- Potential haul routes for the West Seattle and Ballard Link Extension project

Historic resources located throughout the South Downtown area of Seattle have been subject more than a decade of public mega projects, including the Alaskan Way Viaduct Replacement Project, the Elliott Bay Seawall Replacement Project, the Washington State Ferries Colman Dock expansion, construction of the First Hill Streetcar, the ongoing construction of East Link Lightrail. The ability of many historic resources to withstand those mega projects is in significant part a result of impact mitigation that those projects have provided under Section 106 of the National Historic Preservation Act.

During Section 106 review for many of the region's mega-projects (those whose overall cost exceeds \$1 billion, as defined by the Washington State Legislature), we have learned the importance of thoroughly investigating the area beyond the immediate construction footprint for potential impacts to historic resources. Long-term infrastructure projects in the Seattle area, with construction timelines beyond five years time, come with extended long-term impacts to resources that live well beyond a construction fence.

In the case of WSBLE, no matter what alignment is selected (4th or 5th), Sound Transit will be building a tunnel through downtown Seattle, and those spoils will have to go somewhere. The tunnel portal and subsequent work area will likely be located in SODO or Chinatown ID. That's a lot of dirt, and a lot of trucks carrying dirt and materials to and from a tunnel portal that will have to find their way through either Chinatown ID or Pioneer Square for the duration of construction. There are limited options to get to and from these neighborhoods—and Sound Transit will likely have to use 4<sup>th</sup> Avenue, 5<sup>th</sup> Avenue, Yesler Avenue, and/or Alaskan Way.

Both Alaskan Way and 4<sup>th</sup> Avenues have major transportation function, have intersections that are expected to be at LOS E and F during the construction period, and have gridlock on many occasions, particularly during the days when events in the Stadium District coincide with rush hour. When that happens, accessibility in the entire Pioneer Square and Chinatown ID becomes extremely difficult. So all of those areas are likely to be adversely affected and warrant a full review of the area, not just the project footprint.

In addition to traffic impacts caused by both diversion, and by hauling tens of thousands of truckloads of dirt and materials to and from the portal, we anticipate that years of noise, vibration, and dust could erode the overall cultural environments, and impact nearby historic properties. The two historic neighborhoods have been working to preserve the existing connectivity between them, and where practicable, to improve it while retaining their respective historic character. The anticipated decade-long construction of this project could have serious impacts to these neighborhood efforts, and warrant a more comprehensive look at the effects of construction on the neighborhoods as a whole.

Historic South Downtown appreciates the opportunity to work with you as a consulting party on the upcoming Section 106 process.

Best wishes,

Kathleen Barry Johnson

**Executive Director** 

Historic South Downtown

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# Yellin, Michelle

From: Ryan Smith <rsmith@martinsmith.com>
Sent: Wednesday, September 30, 2020 9:59 AM

**To:** Assam, Mark (FTA)

**Cc:** Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Witmer, John;

Changhchien, Amy; Costanza, Ann; Barbara Bundy; fta.tro10mail

**Subject:** RE: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section

106 Consulting Party Invitation

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September 30, 2020

Submitted via email to: mark.assam@dot.gov

Linda Gehrke
Regional Administrator
USDOT Federal Transit Administration, Region
X
915 Second Avenue
Federal Building, Suite 3142
Seattle, WA 98174

Re: Consulting Party Invitation to Section 106 NHPA

for West Seattle and Ballard Link Extensions Project

Dear Ms. Gehrke:

Martin Smith Inc formally accepts the invitation to participate in the upcoming Section 106 consultation for the West Seattle to Ballard Link Extension Project. I will serve as our organization's point of contact for this process.

Martin Smith Inc and it's affiliates own several historic buildings in Pioneer Square and we ask that you expand the Area of Potential Effect (APE) to include the entire Pioneer Square Historic District. The entire Pioneer Square neighborhood will suffer significant impacts from this Project and these impacts need to be considered and mitigated to the extent possible. In addition, I ask that you specifically include the following MSI related properties that will be impacted by this project:

Maynard Building (119 1st Ave. S.)
Union Trust Building (119 S. Main St.)
Occidental Mall (308-316 Occidental Ave. S.)
First & King Building (101 S. King St.)
Provident Building (568 1st Ave. S.)

I also ask that you include the entire Chinatown International District (CID) neighborhood in the APE as well, given the cultural and economic importance of these rare historic districts.

Thank you for your time and consideration. We look forward to working with you in this important process.

Respectfully,

Ryan Smith Martin Smith Inc 1932 1<sup>st</sup> Avenue, Suite 1000 Seattle, WA 98101 (206) 521-0506

From: Assam, Mark (FTA) < Mark. Assam@dot.gov>

**Sent:** Tuesday, September 1, 2020 9:27 PM **To:** Ryan Smith <rsmith@martinsmith.com>

Cc: Wardlaw, Dennis (DAHP) <dennis.wardlaw@dahp.wa.gov>; Swift, Lauren <lauren.swift@soundtransit.org>; Green, Erin <erin.green@soundtransit.org>; Stevenson, Alex <alex.stevenson@soundtransit.org>; Witmer, John (FTA) <John.Witmer@dot.gov>; Changchien, Amy (FTA) <Amy.Changchien@dot.gov>; Costanza, Ann <acostanza@anchorqea.com>; Barbara Bundy <bbundy@anchorqea.com>; fta.tro10mail <fta.tro10mail@dot.gov> Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Invitation

Dear Mr. Smith:

Please see the attached Section 106 Consulting Party Invitation letter for the Sound Transit - West Seattle and Ballard Link Extensions Project.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

December 7, 2020

Michael King, Ph.D. Executive Director Southwest Seattle Historical Society 3003 61st Avenue SW Seattle, WA 98116

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Consulting Party Invitation** 

Dear Dr. King:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area, in Seattle, King County, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter invites your organization to participate in the Section 106 consultation process for the Project as a consulting party.

# **Project Description**

The Project would extend Link light rail service 11.8 miles from downtown Seattle to both West Seattle and Ballard (see enclosed Project Vicinity Maps). The Project includes light rail guideway with elevated, at-grade, and tunnel profiles. It also includes 14 stations that would either be elevated, at-grade, or in a tunnel. The stations would serve the following areas in Seattle: Alaska Junction, Avalon, Delridge, SODO, the sports stadiums, Chinatown/International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

### **Area of Potential Effects**

The Area of Potential Effects (APE) for the Project is illustrated in the enclosed APE Map Set. The APE includes all areas where ground disturbance may occur, including excavation, grading, curb removal, utilities, etc. The APE includes areas where stations, transit centers, and other improvements are planned. It also includes possible construction staging areas.

The APE also includes areas where the potential exists for historic properties to be indirectly affected by the Project. Where station construction, signal upgrades, and other highly visible improvements are planned, the APE extends on either side of the right-of-way to the nearest tax parcel, or to a maximum of 200 feet where large tax parcels are adjacent to Project elements. The APE is larger in the following areas, to account for potential visual effects:

- Salmon Bay, where some Project alternatives include a high-level fixed bridge, the APE extends 0.25 mile from the center of the proposed high-level bridges at 14th Avenue NW and 15th Avenue NW. It also extends to parcels on the southwest side of the Ballard Bridge (between 21st Avenue West and the shoreline, north of West Nickerson Street) and includes all of Fishermen's Terminal.
- SW Genesee Street between 26th Avenue SW and 30th Avenue SW, where one Project alternative includes high guideway height, the APE extends to two parcels to the north of SW Genesee Street.
- SODO, where some of the Project alternatives would reconstruct South Holgate Street and South Lander Street to cross over the existing and proposed light rail alignments, the APE extends one additional parcel from the guideway.

A survey for historic resources is currently underway to identify buildings, structures, sites, objects, and districts constructed in 1980 or earlier that are within the APE or on parcels crossed by the APE, and to assess their potential to be affected by the Project. Historic resources identified during the survey will be documented in the Washington Information System for Architectural and Archaeological Records Data (WISAARD) database, and evaluated for eligibility for listing on the National Register of Historic Places (NRHP).

An archaeological survey will also be conducted within the APE that includes a pedestrian survey and shovel testing to identify and assess the potential for intact archaeological deposits. Shovel testing will be focused where ground disturbance is planned in areas that have not been previously disturbed. Where archaeological high-probability areas identified within the APE cannot be tested prior to Project construction, archaeological monitoring during construction will be recommended.

# **Consulting Party Role**

FTA invites your organization to participate as a consulting party because you may have a demonstrated interest in the Project and in its potential effects on historic and cultural properties. As you may know, Section 106 is a process that may not result in preservation in all instances but seeks to balance a full range of public values and perspectives to avoid, minimize, or mitigate adverse effects on historic properties. Consulting party status entitles you to comment on aspects of the Project that would potentially affect historic properties. As a consulting party, you would receive information about historic properties within the APE, and potential effects to those

December 7, 2020 Page 3

properties in which you may have an interest. Properties of interest include those buildings, structures, objects, sites, and districts that are either listed, or eligible for listing, on the NRHP.

If you elect to participate as a consulting party, please inform FTA of your decision and provide any comments on the APE within 30 days of receipt of this letter. Should you require additional information or have questions, please contact Mark Assam at 206-220-4465 or mark.assam@dot.gov.

Thank you for your interest in the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE
GEHRKE Date: 2020.12.07 15:33:30 -08'00'

Linda M. Gehrke Regional Administrator

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
 Lauren Swift, Central Corridor Environmental Manager, Sound Transit
 Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Project Vicinity Maps

Area of Potential Effects Map Set



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

December 7, 2020

Derek Lum Equitable Development Policy Analyst InterIm Community Development Association 310 Mayard Avenue South Seattle, WA 98104

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Consulting Party Invitation** 

Dear Mr. Lum:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is proposing the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area, in Seattle, King County, Washington. Sound Transit intends to apply for federal funds administered by FTA for the Project, making it an undertaking subject to the provisions of Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800. This letter invites your organization to participate in the Section 106 consultation process for the Project as a consulting party.

# **Project Description**

The Project would extend Link light rail service 11.8 miles from downtown Seattle to both West Seattle and Ballard (see enclosed Project Vicinity Maps). The Project includes light rail guideway with elevated, at-grade, and tunnel profiles. It also includes 14 stations that would either be elevated, at-grade, or in a tunnel. The stations would serve the following areas in Seattle: Alaska Junction, Avalon, Delridge, SODO, the sports stadiums, Chinatown/International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

### **Area of Potential Effects**

The Area of Potential Effects (APE) for the Project is illustrated in the enclosed APE Map Set. The APE includes all areas where ground disturbance may occur, including excavation, grading, curb removal, utilities, etc. The APE includes areas where stations, transit centers, and other improvements are planned. It also includes possible construction staging areas.

The APE also includes areas where the potential exists for historic properties to be indirectly affected by the Project. Where station construction, signal upgrades, and other highly visible improvements are planned, the APE extends on either side of the right-of-way to the nearest tax parcel, or to a maximum of 200 feet where large tax parcels are adjacent to Project elements. The APE is larger in the following areas, to account for potential visual effects:

- Salmon Bay, where some Project alternatives include a high-level fixed bridge, the APE extends 0.25 mile from the center of the proposed high-level bridges at 14th Avenue NW and 15th Avenue NW. It also extends to parcels on the southwest side of the Ballard Bridge (between 21st Avenue West and the shoreline, north of West Nickerson Street) and includes all of Fishermen's Terminal.
- SW Genesee Street between 26th Avenue SW and 30th Avenue SW, where one Project alternative includes high guideway height, the APE extends to two parcels to the north of SW Genesee Street.
- SODO, where some of the Project alternatives would reconstruct South Holgate Street and South Lander Street to cross over the existing and proposed light rail alignments, the APE extends one additional parcel from the guideway.

A survey for historic resources is currently underway to identify buildings, structures, sites, objects, and districts constructed in 1980 or earlier that are within the APE or on parcels crossed by the APE, and to assess their potential to be affected by the Project. Historic resources identified during the survey will be documented in the Washington Information System for Architectural and Archaeological Records Data (WISAARD) database, and evaluated for eligibility for listing on the National Register of Historic Places (NRHP).

An archaeological survey will also be conducted within the APE that includes a pedestrian survey and shovel testing to identify and assess the potential for intact archaeological deposits. Shovel testing will be focused where ground disturbance is planned in areas that have not been previously disturbed. Where archaeological high-probability areas identified within the APE cannot be tested prior to Project construction, archaeological monitoring during construction will be recommended.

# **Consulting Party Role**

FTA invites your organization to participate as a consulting party because you may have a demonstrated interest in the Project and in its potential effects on historic and cultural properties. As you may know, Section 106 is a process that may not result in preservation in all instances but seeks to balance a full range of public values and perspectives to avoid, minimize, or mitigate adverse effects on historic properties. Consulting party status entitles you to comment on aspects of the Project that would potentially affect historic properties. As a consulting party, you would receive information about historic properties within the APE, and potential effects to those

December 7, 2020 Page 3

properties in which you may have an interest. Properties of interest include those buildings, structures, objects, sites, and districts that are either listed, or eligible for listing, on the NRHP.

If you elect to participate as a consulting party, please inform FTA of your decision and provide any comments on the APE within 30 days of receipt of this letter. Should you require additional information or have questions, please contact Mark Assam at 206-220-4465 or mark.assam@dot.gov.

Thank you for your interest in the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

Date: 2020.12.07
15:36:43-08'00'

Linda M. Gehrke Regional Administrator

 Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation
 Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosures: Project Vicinity Maps

Area of Potential Effects Map Set

December 21, 2020

Submitted via email to: mark.assam@dot.gov

Linda Gehrke Regional Administrator USDOT Federal Transit Administration, Region X 915 Second Avenue Federal Building, Suite 3142 Seattle, WA 98174

Request to be Consulting Party to Section 106 NHPA process for West Seattle and Ballard Link Extensions Project, and comments on the Area of Potential Effect

Dear Ms. Gehrke and Mr. Assam,

This letter is submitted on behalf of InterIm Community Development Association (ICDA). We would like to participate in the upcoming Section 106 consultation for the West Seattle to Ballard Link Extension Project ("WSBLE").

We reviewed the Area of Potential Effect (APE) provided in the maps distributed along with the consultation invitation letter dated August 31, 2020, and request that FTA and Sound Transit expand the APE to include the following areas:

- The entirety of the Pioneer Square-Skid Road Historic District (PSSRHD)
- The entirety of the International Special Review District of the Seattle Chinatown International District neighborhood (ISRD district)
- Potential haul routes for the West Seattle and Ballard Link Extension project

We would like to emphasize that we own two National Landmark Historic buildings which do not fall within the current boundaries.

- The Eastern Hotel, 506 Maynard Ave South, Seattle WA 98104
- The Northern Pacific Hotel, 306 6<sup>th</sup> Ave South, Seattle WA 98104

Additionally, we have provided consultation services to various other buildings and organizations in the Chinatown-International District over our more than fifty years serving the community. We also provide services to a wide array of residents who live in a wide array of buildings, a vast majority of which are in the Historic District and which are Historic buildings.

There are many public works projects which the historic properties in our district have been subjected to recently. This includes the Colman Dock, SR 520, Alaskan Way Viaduct Replacement, First Hill Streetcar, East Link, and more. These historic resources ability to withstand these public projects is because of provided mitigation through Section 106.

Projects of this scale cause much wider effects than the immediate zone of the construction outlined in your maps. Long term infrastructure projects in the Seattle area, with construction timelines beyond five years' time, come with extended long-term impacts to resources that live well beyond a construction fence.

Regardless of if 4<sup>th</sup> or 5<sup>th</sup> ave is chosen for alignment, Sound Transit will likely need to use 4<sup>th</sup> ave, 5<sup>th</sup> ave, Yesler Way, or Alaskan Way to haul away dirt and other materials. This construction traffic could coincide with rush hour, stadium traffic, holiday traffic, or some combination of all of them. Any combination would make getting in and out of the area difficult if not impossible, and so would certainly harm the historic assets that exist beyond the project footprint, including upon organizations like ourselves. Additionally, the dust, noise, and pollution from construction activity would further impact the historic assets in the wider community. These harms would decrease the sustainability of the historic properties that are beyond your current impacted area.

In closing, we are asking to be included as a Section 106 Consulting Party, and furthermore we are asking that the impacted zone for this project be expanded to include the PSSRHD and ISRD areas. We would like to truly mitigate the harm that will come to historic properties in these historic neighborhoods.

Thank you and I hope to hear back soon,

Derek Lum, MSW

InterIm Community Development Association

# Yellin, Michelle

From: Sent: To: Subject:	Green, Erin <erin.green@soundtransit.org> Friday, February 19, 2021 8:29 AM Yellin, Michelle [EXTERNAL] FW: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Invitation</erin.green@soundtransit.org>				
<pre><lauren.swift@soundtransit.org> <bbundy@anchorqea.com> Cc: Ziglar, Kristine (FTA) <kristine.< pre=""></kristine.<></bbundy@anchorqea.com></lauren.swift@soundtransit.org></pre>	21 10:26 AM on@soundtransit.org>; Green, Erin <erin.green@soundtransit.org>; Swift, Lauren Costanza, Ann <acostanza@anchorqea.com>; Barbara Bundy</acostanza@anchorqea.com></erin.green@soundtransit.org>				
<b>CAUTION:</b> This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security					
Team:					
FYI					
Thanks,					
Mark A. Assam, AICP U.S. Department of Transportation Federal Transit Administration, Reg 915 2nd Avenue, Suite 3142   Seat (206) 220-4465   mark.assam@dot	tle, WA 98174-1002				
From: Michael King [mailto:direct Sent: Tuesday, December 29, 202 To: Assam, Mark (FTA) < Mark. Ass	0 4:38 PM				

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Subject: Re: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party

Hi Mark,

Invitation

I'm just writing to confirm that the Southwest Seattle Historical Society would like to accept the invitation to serve as a consulting party for the West Seattle and Ballard Link Extension Project. We will follow up with comments very soon.
Thanks again for your help with this.
With best wishes,
Michael
On Mon, Dec 7, 2020 at 4:09 PM Assam, Mark (FTA) < <u>Mark.Assam@dot.gov</u> > wrote:
Dear Dr. King:
Please see the attached Section 106 Consulting Party Invitation letter for the Sound Transit - West Seattle and Ballard Link Extensions Project.
Thanks,
Mark A. Assam, AICP
U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142   Seattle, WA 98174-1002
(206) 220-4465   mark.assam@dot.gov   www.transit.dot.gov



**Michael King**Executive Director, Southwest Seattle Historical Society www.loghousemuseum.org (206) 350 - 0999

This page is intentionally left blank.

From: Assam, Mark (FTA)

To: sarah.sodt@seattle.gov

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Changhchien,

**Amy** 

Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Kickoff

Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 11:58:08 AM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

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Dear Ms. Sodt:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit - West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

- Kickoff the Section 106 consultation process with the additional Consulting Parties
- Outline the Section 106 consultation process and roles
- Review Consulting Party feedback already received on the Area of Potential Effects (APE)
- Provide Consulting Parties the opportunity to provide additional input or identify concerns regarding the APE

Please look for an e-mailed meeting invitation from Sound Transit inviting you to attend using a Microsoft Teams link.

In preparation for the meeting and our upcoming consultation process, we have prepared a "Section 106 Additional Consulting Parties Coordination Plan" for your review prior to the meeting. A copy of this plan is attached to this e-mail.

We understand that not everyone will be able to attend the kickoff meeting. FTA and Sound Transit will be happy to follow up individually with those who cannot make the meeting. A meeting summary will also be provided to all Consulting Parties after the meeting.

Ρ	lease	let me	know if ۱	vou have	questions.

Thanks,

From: Assam, Mark (FTA)
To: eugeniaw@historicseattle.org

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Changhchien,

<u>Amy</u>

Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Kickoff

Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 11:58:08 AM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

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Dear Ms. Woo:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit - West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

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- Outline the Section 106 consultation process and roles
- Review Consulting Party feedback already received on the Area of Potential Effects (APE)
- Provide Consulting Parties the opportunity to provide additional input or identify concerns regarding the APE

Please look for an e-mailed meeting invitation from Sound Transit inviting you to attend using a Microsoft Teams link.

In preparation for the meeting and our upcoming consultation process, we have prepared a "Section 106 Additional Consulting Parties Coordination Plan" for your review prior to the meeting. A copy of this plan is attached to this e-mail.

We understand that not everyone will be able to attend the kickoff meeting. FTA and Sound Transit will be happy to follow up individually with those who cannot make the meeting. A meeting summary will also be provided to all Consulting Parties after the meeting.

Thanks,

From: Assam, Mark (FTA)
To: Kathleen Johnson

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Changhchien,

<u>Amy</u>

Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Kickoff

Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 11:58:23 AM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

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Dear Ms. Barry Johnson:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit - West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

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- Outline the Section 106 consultation process and roles
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- Provide Consulting Parties the opportunity to provide additional input or identify concerns regarding the APE

Please look for an e-mailed meeting invitation from Sound Transit inviting you to attend using a Microsoft Teams link.

In preparation for the meeting and our upcoming consultation process, we have prepared a "Section 106 Additional Consulting Parties Coordination Plan" for your review prior to the meeting. A copy of this plan is attached to this e-mail.

We understand that not everyone will be able to attend the kickoff meeting. FTA and Sound Transit will be happy to follow up individually with those who cannot make the meeting. A meeting summary will also be provided to all Consulting Parties after the meeting.

Please let me know if you have questions
--

Thanks,

From: Assam, Mark (FTA)
To: Derek Lum

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Changhchien,

<u>Amy</u>

Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Kickoff

Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 11:58:35 AM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

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Dear Mr. Lum:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit - West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

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- Outline the Section 106 consultation process and roles
- Review Consulting Party feedback already received on the Area of Potential Effects (APE)
- Provide Consulting Parties the opportunity to provide additional input or identify concerns regarding the APE

Please look for an e-mailed meeting invitation from Sound Transit inviting you to attend using a Microsoft Teams link.

In preparation for the meeting and our upcoming consultation process, we have prepared a "Section 106 Additional Consulting Parties Coordination Plan" for your review prior to the meeting. A copy of this plan is attached to this e-mail.

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Ρ	lease	let me	know if ۱	vou have	questions.

Thanks,

From: Assam, Mark (FTA)
To: Meisner, Jennifer

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Changhchien,

<u>Amy</u>

Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Kickoff

Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 11:58:51 AM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

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Dear Ms. Meisner:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit - West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

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Please look for an e-mailed meeting invitation from Sound Transit inviting you to attend using a Microsoft Teams link.

In preparation for the meeting and our upcoming consultation process, we have prepared a "Section 106 Additional Consulting Parties Coordination Plan" for your review prior to the meeting. A copy of this plan is attached to this e-mail.

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Please let me know if y	ou have questions.
-------------------------	--------------------

Thanks,

From: Assam, Mark (FTA)

To: rsmith@martinsmith.com

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Changhchien,

<u>Amy</u>

Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Kickoff

Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 11:59:03 AM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

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Dear Mr. Smith:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit - West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

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Ρ	lease	let me	know if ۱	vou have	questions.

Thanks,

From: Assam, Mark (FTA)
To: Lisa Howard

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Changhchien,

<u>Amy</u>

Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Kickoff

Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 11:57:56 AM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

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Dear Ms. Howard:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit - West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

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Thanks,

 From:
 Assam, Mark (FTA)

 To:
 Maiko WC

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Changhchien,

<u>Amy</u>

Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Kickoff

Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 11:59:21 AM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

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Dear Ms. Winkler-Chin:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit - West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

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Ρ	lease	let me	know if ۱	vou have	questions.

Thanks,

From: Assam, Mark (FTA)
To: Michael King

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Changhchien,

<u>Amy</u>

Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Kickoff

Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 11:59:30 AM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

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Dear Dr. King:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit - West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

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Please let me know if you have questions
--

Thanks,

Mark A. Assam, AICP

From: Assam, Mark (FTA)

To: jmortensen@preservwa.org

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Changhchien,

<u>Amy</u>

Subject: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Kickoff

Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 11:59:39 AM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

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Dear Ms. Mortensen:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit - West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

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Ρ	lease	let me	know if ۱	vou have	questions.

Thanks,

Mark A. Assam, AICP

From: Assam, Mark (FTA)
To: Wardlaw, Dennis

Cc: Swift, Lauren; Green, Erin; Stevenson, Alex; Costanza, Ann; Barbara Bundy; Changhchien, Amy

Subject: RE: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party Kickoff

Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 12:00:45 PM

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Hi Dennis,

As I mentioned in the e-mail distribution below, you will be seeing a meeting invitation from Sound Transit shortly. I hope you will be able to attend.

Please let me know if you have questions.

Thanks,

## Mark A. Assam, AICP

U.S. Department of Transportation Federal Transit Administration, Region X 915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002 (206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Assam, Mark (FTA)

Sent: Monday, March 22, 2021 8:00 AM

To: CONSULTING PARTIES

**Subject:** Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106

Consulting Party Kickoff Meeting Notice and Coordination Plan

Dear RECIPIENT:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit - West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

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Please let me know if you have questions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation Federal Transit Administration, Region X 915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002 (206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov From: Assam, Mark (FTA)
To: Murphy, Laura

Cc: Wardlaw, Dennis; White, Madrienne; Swift, Lauren; Green, Erin; Stevenson, Alex; Hayes, Dezerae; Costanza,

Ann; Barbara Bundy; Changhchien, Amy

Subject: FW: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party

Kickoff Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 11:59:51 AM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

**CAUTION:** This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Dear Ms. Murphy:

As described in the distribution e-mail below, FTA and Sound Transit will be hosting a virtual kickoff meeting for organizations that FTA has invited to be Section 106 additional Consulting Parties for the Sound Transit - West Seattle and Ballard Link Extensions Project. The meeting will focus on providing an overview of the Section 106 process, additional Consulting Party roles, and the Area of Potential Effects. I wanted to make sure that you were aware of this meeting, and invite you to attend if you are interested. If you are interested in attending, please reply to me and I will see that you are sent the invitation e-mail by Sound Transit with the meeting link.

FTA will of course continue to conduct individual government-to-government consultation with your Tribe on the project.

Please let me know if you have guestions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation Federal Transit Administration, Region X 915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002 (206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Assam, Mark (FTA)

**Sent:** Monday, March 22, 2021 8:00 AM

To: CONSULTING PARTIES

**Subject:** Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106

Consulting Party Kickoff Meeting Notice and Coordination Plan

Dear RECIPIENT:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit -

West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

- Kickoff the Section 106 consultation process with the additional Consulting Parties
- Outline the Section 106 consultation process and roles
- Review Consulting Party feedback already received on the Area of Potential Effects (APE)
- Provide Consulting Parties the opportunity to provide additional input or identify concerns regarding the APE

Please look for an e-mailed meeting invitation from Sound Transit inviting you to attend using a Microsoft Teams link.

In preparation for the meeting and our upcoming consultation process, we have prepared a "Section 106 Additional Consulting Parties Coordination Plan" for your review prior to the meeting. A copy of this plan is attached to this e-mail.

We understand that not everyone will be able to attend the kickoff meeting. FTA and Sound Transit will be happy to follow up individually with those who cannot make the meeting. A meeting summary will also be provided to all Consulting Parties after the meeting.

Please let me know if you have questions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Assam, Mark (FTA)

To: Mullen-Moses, Steven

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Hayes, Dezerae; Costanza, Ann; Barbara Bundy;

Changhchien, Amy

Subject: FW: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party

Kickoff Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 12:00:34 PM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

**CAUTION:** This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Dear Mr. Mullen-Moses:

As described in the distribution e-mail below, FTA and Sound Transit will be hosting a virtual kickoff meeting for organizations that FTA has invited to be Section 106 additional Consulting Parties for the Sound Transit - West Seattle and Ballard Link Extensions Project. The meeting will focus on providing an overview of the Section 106 process, additional Consulting Party roles, and the Area of Potential Effects. I wanted to make sure that you were aware of this meeting, and invite you to attend if you are interested. If you are interested in attending, please reply to me and I will see that you are sent the invitation e-mail by Sound Transit with the meeting link.

FTA will of course continue to conduct individual government-to-government consultation with your Tribe on the project.

Please let me know if you have questions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Assam, Mark (FTA)

**Sent:** Monday, March 22, 2021 8:00 AM

To: CONSULTING PARTIES

**Subject:** Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106

Consulting Party Kickoff Meeting Notice and Coordination Plan

Dear RECIPIENT:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit -

West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

- Kickoff the Section 106 consultation process with the additional Consulting Parties
- Outline the Section 106 consultation process and roles
- Review Consulting Party feedback already received on the Area of Potential Effects (APE)
- Provide Consulting Parties the opportunity to provide additional input or identify concerns regarding the APE

Please look for an e-mailed meeting invitation from Sound Transit inviting you to attend using a Microsoft Teams link.

In preparation for the meeting and our upcoming consultation process, we have prepared a "Section 106 Additional Consulting Parties Coordination Plan" for your review prior to the meeting. A copy of this plan is attached to this e-mail.

We understand that not everyone will be able to attend the kickoff meeting. FTA and Sound Transit will be happy to follow up individually with those who cannot make the meeting. A meeting summary will also be provided to all Consulting Parties after the meeting.

Please let me know if you have questions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Assam, Mark (FTA)
To: Lyste, Kerry

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Hayes, Dezerae; Costanza, Ann; Barbara Bundy;

Changhchien, Amy

Subject: FW: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party

Kickoff Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 12:00:02 PM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

**CAUTION:** This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Dear Mr. Lyste:

As described in the distribution e-mail below, FTA and Sound Transit will be hosting a virtual kickoff meeting for organizations that FTA has invited to be Section 106 additional Consulting Parties for the Sound Transit - West Seattle and Ballard Link Extensions Project. The meeting will focus on providing an overview of the Section 106 process, additional Consulting Party roles, and the Area of Potential Effects. I wanted to make sure that you were aware of this meeting, and invite you to attend if you are interested. If you are interested in attending, please reply to me and I will see that you are sent the invitation e-mail by Sound Transit with the meeting link.

FTA will of course continue to conduct individual government-to-government consultation with your Tribe on the project.

Please let me know if you have guestions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Assam, Mark (FTA)

**Sent:** Monday, March 22, 2021 8:00 AM

To: CONSULTING PARTIES

**Subject:** Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106

Consulting Party Kickoff Meeting Notice and Coordination Plan

Dear RECIPIENT:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit -

West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

- Kickoff the Section 106 consultation process with the additional Consulting Parties
- Outline the Section 106 consultation process and roles
- Review Consulting Party feedback already received on the Area of Potential Effects (APE)
- Provide Consulting Parties the opportunity to provide additional input or identify concerns regarding the APE

Please look for an e-mailed meeting invitation from Sound Transit inviting you to attend using a Microsoft Teams link.

In preparation for the meeting and our upcoming consultation process, we have prepared a "Section 106 Additional Consulting Parties Coordination Plan" for your review prior to the meeting. A copy of this plan is attached to this e-mail.

We understand that not everyone will be able to attend the kickoff meeting. FTA and Sound Transit will be happy to follow up individually with those who cannot make the meeting. A meeting summary will also be provided to all Consulting Parties after the meeting.

Please let me know if you have questions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Assam, Mark (FTA)
To: Lewarch, Dennis

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Hayes, Dezerae; Costanza, Ann; Barbara Bundy;

Changhchien, Amy

Subject: FW: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party

Kickoff Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 12:00:12 PM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

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Dear Mr. Lewarch:

As described in the distribution e-mail below, FTA and Sound Transit will be hosting a virtual kickoff meeting for organizations that FTA has invited to be Section 106 additional Consulting Parties for the Sound Transit - West Seattle and Ballard Link Extensions Project. The meeting will focus on providing an overview of the Section 106 process, additional Consulting Party roles, and the Area of Potential Effects. I wanted to make sure that you were aware of this meeting, and invite you to attend if you are interested. If you are interested in attending, please reply to me and I will see that you are sent the invitation e-mail by Sound Transit with the meeting link.

FTA will of course continue to conduct individual government-to-government consultation with your Tribe on the project.

Please let me know if you have guestions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation Federal Transit Administration, Region X 915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002 (206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Assam, Mark (FTA)

**Sent:** Monday, March 22, 2021 8:00 AM

To: CONSULTING PARTIES

**Subject:** Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106

Consulting Party Kickoff Meeting Notice and Coordination Plan

Dear RECIPIENT:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit -

West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

- Kickoff the Section 106 consultation process with the additional Consulting Parties
- Outline the Section 106 consultation process and roles
- Review Consulting Party feedback already received on the Area of Potential Effects (APE)
- Provide Consulting Parties the opportunity to provide additional input or identify concerns regarding the APE

Please look for an e-mailed meeting invitation from Sound Transit inviting you to attend using a Microsoft Teams link.

In preparation for the meeting and our upcoming consultation process, we have prepared a "Section 106 Additional Consulting Parties Coordination Plan" for your review prior to the meeting. A copy of this plan is attached to this e-mail.

We understand that not everyone will be able to attend the kickoff meeting. FTA and Sound Transit will be happy to follow up individually with those who cannot make the meeting. A meeting summary will also be provided to all Consulting Parties after the meeting.

Please let me know if you have questions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Assam, Mark (FTA)
To: Young, Richard

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Hayes, Dezerae; Costanza, Ann; Barbara Bundy;

Changhchien, Amy

Subject: FW: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party

Kickoff Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 12:00:25 PM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

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Dear Mr. Young:

As described in the distribution e-mail below, FTA and Sound Transit will be hosting a virtual kickoff meeting for organizations that FTA has invited to be Section 106 additional Consulting Parties for the Sound Transit - West Seattle and Ballard Link Extensions Project. The meeting will focus on providing an overview of the Section 106 process, additional Consulting Party roles, and the Area of Potential Effects. I wanted to make sure that you were aware of this meeting, and invite you to attend if you are interested. If you are interested in attending, please reply to me and I will see that you are sent the invitation e-mail by Sound Transit with the meeting link.

FTA will of course continue to conduct individual government-to-government consultation with your Tribe on the project.

Please let me know if you have questions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation Federal Transit Administration, Region X 915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002 (206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Assam, Mark (FTA)

**Sent:** Monday, March 22, 2021 8:00 AM

To: CONSULTING PARTIES

**Subject:** Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106

Consulting Party Kickoff Meeting Notice and Coordination Plan

Dear RECIPIENT:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit -

West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

- Kickoff the Section 106 consultation process with the additional Consulting Parties
- Outline the Section 106 consultation process and roles
- Review Consulting Party feedback already received on the Area of Potential Effects (APE)
- Provide Consulting Parties the opportunity to provide additional input or identify concerns regarding the APE

Please look for an e-mailed meeting invitation from Sound Transit inviting you to attend using a Microsoft Teams link.

In preparation for the meeting and our upcoming consultation process, we have prepared a "Section 106 Additional Consulting Parties Coordination Plan" for your review prior to the meeting. A copy of this plan is attached to this e-mail.

We understand that not everyone will be able to attend the kickoff meeting. FTA and Sound Transit will be happy to follow up individually with those who cannot make the meeting. A meeting summary will also be provided to all Consulting Parties after the meeting.

Please let me know if you have questions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Assam, Mark (FTA)
To: Valdez, Kate

Cc: Wardlaw, Dennis; Swift, Lauren; Green, Erin; Stevenson, Alex; Hayes, Dezerae; Costanza, Ann; Barbara Bundy;

Changhchien, Amy

Subject: FW: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Consulting Party

Kickoff Meeting Notice and Coordination Plan

**Date:** Monday, March 22, 2021 12:00:43 PM

Attachments: 2021-03-22 ST WSBLE Sec106AddCPCoordPlan.pdf

**CAUTION:** This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Dear Ms. Valdez:

As described in the distribution e-mail below, FTA and Sound Transit will be hosting a virtual kickoff meeting for organizations that FTA has invited to be Section 106 additional Consulting Parties for the Sound Transit - West Seattle and Ballard Link Extensions Project. The meeting will focus on providing an overview of the Section 106 process, additional Consulting Party roles, and the Area of Potential Effects. I wanted to make sure that you were aware of this meeting, and invite you to attend if you are interested. If you are interested in attending, please reply to me and I will see that you are sent the invitation e-mail by Sound Transit with the meeting link.

FTA will of course continue to conduct individual government-to-government consultation with your Tribe on the project.

Please let me know if you have questions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation Federal Transit Administration, Region X 915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002 (206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Assam, Mark (FTA)

**Sent:** Monday, March 22, 2021 8:00 AM

To: CONSULTING PARTIES

**Subject:** Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106

Consulting Party Kickoff Meeting Notice and Coordination Plan

Dear RECIPIENT:

Thank you for accepting the invitation to be a Section 106 Consulting Party for the Sound Transit -

West Seattle and Ballard Link Extensions Project. The Federal Transit Administration (FTA) and Sound Transit plan to hold a virtual kickoff meeting on **March 30, 2021 from 1:00 PM to 2:30 PM**. The purpose of this meeting is to:

- Kickoff the Section 106 consultation process with the additional Consulting Parties
- Outline the Section 106 consultation process and roles
- Review Consulting Party feedback already received on the Area of Potential Effects (APE)
- Provide Consulting Parties the opportunity to provide additional input or identify concerns regarding the APE

Please look for an e-mailed meeting invitation from Sound Transit inviting you to attend using a Microsoft Teams link.

In preparation for the meeting and our upcoming consultation process, we have prepared a "Section 106 Additional Consulting Parties Coordination Plan" for your review prior to the meeting. A copy of this plan is attached to this e-mail.

We understand that not everyone will be able to attend the kickoff meeting. FTA and Sound Transit will be happy to follow up individually with those who cannot make the meeting. A meeting summary will also be provided to all Consulting Parties after the meeting.

Please let me know if you have questions.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation
Federal Transit Administration, Region X
915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 25, 2021

Eugenia Woo Director of Preservation Services Historic Seattle 1117 Minor Avenue Seattle, WA 98101

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Woo:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. FTA invited your organization to participate in the Section 106 consultation process for the Project as a Consulting Party, and requested comments on the proposed Area of Potential Effects (APE) in correspondence dated August 31, 2020. Since that time, the Project design has advanced, and Sound Transit has better defined the proposed station locations, station areas, and other Project elements, which require an amendment to the Project APE. This letter requests comments on the amended APE.

FTA looks forward to meeting with you to discuss the Project and the Section 106 process. Pursuant to 36 CFR Part 800, if you have any additional comments on the amended APE, please provide them within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.03.25 06:30:14 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: APE Map Set - West Seattle and Ballard Link Extensions Vicinity Map, and

Proposed Area of Potential Effects (APE) for Sound Transit West Seattle and



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 25, 2021

Lisa Howard Executive Director Alliance for Pioneer Square P.O. Box 4507 Seattle, WA 98194

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Howard:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. FTA invited your organization to participate in the Section 106 consultation process for the Project as a Consulting Party, and requested comments on the proposed Area of Potential Effects (APE) in correspondence dated August 31, 2020. Since that time, the Project design has advanced, and Sound Transit has better defined the proposed station locations, station areas, and other Project elements, which require an amendment to the Project APE. This letter requests comments on the amended APE.

FTA looks forward to meeting with you to discuss the Project and the Section 106 process. Pursuant to 36 CFR Part 800, if you have any additional comments on the amended APE, please provide them within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.03.25 06:23:00 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: APE Map Set - West Seattle and Ballard Link Extensions Vicinity Map, and

Proposed Area of Potential Effects (APE) for Sound Transit West Seattle and



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 25, 2021

Sarah Sodt City Historic Preservation Officer City of Seattle Historic Preservation Office P.O. Box 94649 Seattle, WA 98124-4649

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Sodt:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. FTA invited your organization to participate in the Section 106 consultation process for the Project as a Consulting Party, and requested comments on the proposed Area of Potential Effects (APE) in correspondence dated August 31, 2020. Since that time, the Project design has advanced, and Sound Transit has better defined the proposed station locations, station areas, and other Project elements, which require an amendment to the Project APE. This letter requests comments on the amended APE.

FTA looks forward to meeting with you to discuss the Project and the Section 106 process. Pursuant to 36 CFR Part 800, if you have any additional comments on the amended APE, please provide them within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.03.25 06:25:45 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: APE Map Set - West Seattle and Ballard Link Extensions Vicinity Map, and

Proposed Area of Potential Effects (APE) for Sound Transit West Seattle and



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 25, 2021

Kathleen Barry Johnson Executive Director Historic South Downtown Community Preservation and Development Authority 409B Maynard Avenue South Seattle, WA 98107

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Barry Johnson:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. FTA invited your organization to participate in the Section 106 consultation process for the Project as a Consulting Party, and requested comments on the proposed Area of Potential Effects (APE) in correspondence dated August 31, 2020. Since that time, the Project design has advanced, and Sound Transit has better defined the proposed station locations, station areas, and other Project elements, which require an amendment to the Project APE. This letter requests comments on the amended APE.

FTA looks forward to meeting with you to discuss the Project and the Section 106 process. Pursuant to 36 CFR Part 800, if you have any additional comments on the amended APE, please provide them within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.03.25 06:34:22 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: APE Map Set - West Seattle and Ballard Link Extensions Vicinity Map, and

Proposed Area of Potential Effects (APE) for Sound Transit West Seattle and



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 25, 2021

Derek Lum Equitable Development Policy Analyst InterIm Community Development Association 310 Maynard Avenue South Seattle, WA 98104

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Mr. Lum:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. FTA invited your organization to participate in the Section 106 consultation process for the Project as a Consulting Party, and requested comments on the proposed Area of Potential Effects (APE) in correspondence dated December 7, 2020. Since that time, the Project design has advanced, and Sound Transit has better defined the proposed station locations, station areas, and other Project elements, which require an amendment to the Project APE. This letter requests comments on the amended APE.

FTA looks forward to meeting with you to discuss the Project and the Section 106 process. Pursuant to 36 CFR Part 800, if you have any additional comments on the amended APE, please provide them within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.03.25 06:37:24 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: APE Map Set - West Seattle and Ballard Link Extensions Vicinity Map, and

Proposed Area of Potential Effects (APE) for Sound Transit West Seattle and



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 25, 2021

Jennifer Meisner Preservation Officer King County Historic Preservation Program 201 South Jackson Street, Suite 700 Seattle, WA 98104

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Meisner:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. FTA invited your organization to participate in the Section 106 consultation process for the Project as a Consulting Party, and requested comments on the proposed Area of Potential Effects (APE) in correspondence dated August 31, 2020. Since that time, the Project design has advanced, and Sound Transit has better defined the proposed station locations, station areas, and other Project elements, which require an amendment to the Project APE. This letter requests comments on the amended APE.

FTA looks forward to meeting with you to discuss the Project and the Section 106 process. Pursuant to 36 CFR Part 800, if you have any additional comments on the amended APE, please provide them within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.03.25 06:42:17 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: APE Map Set - West Seattle and Ballard Link Extensions Vicinity Map, and

Proposed Area of Potential Effects (APE) for Sound Transit West Seattle and



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 25, 2021

Ryan Smith Principal Martin Smith, Inc. 1932 1st Avenue, Suite 1000 Seattle, WA 98101

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Mr. Smith:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. FTA invited your organization to participate in the Section 106 consultation process for the Project as a Consulting Party, and requested comments on the proposed Area of Potential Effects (APE) in correspondence dated August 31, 2020. Since that time, the Project design has advanced, and Sound Transit has better defined the proposed station locations, station areas, and other Project elements, which require an amendment to the Project APE. This letter requests comments on the amended APE.

FTA looks forward to meeting with you to discuss the Project and the Section 106 process. Pursuant to 36 CFR Part 800, if you have any additional comments on the amended APE, please provide them within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

Date: 2021.03.25
06:47:56-07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: APE Map Set - West Seattle and Ballard Link Extensions Vicinity Map, and

Proposed Area of Potential Effects (APE) for Sound Transit West Seattle and



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March 25, 2021

Maiko Winkler-Chin Executive Director Seattle Chinatown International District Preservation and Development Authority P.O. Box 3302 Seattle, WA 98114

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Winkler-Chin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. FTA invited your organization to participate in the Section 106 consultation process for the Project as a Consulting Party, and requested comments on the proposed Area of Potential Effects (APE) in correspondence dated August 31, 2020. Since that time, the Project design has advanced, and Sound Transit has better defined the proposed station locations, station areas, and other Project elements, which require an amendment to the Project APE. This letter requests comments on the amended APE.

FTA looks forward to meeting with you to discuss the Project and the Section 106 process. Pursuant to 36 CFR Part 800, if you have any additional comments on the amended APE, please provide them within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.03.25 06:51:39 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: APE Map Set - West Seattle and Ballard Link Extensions Vicinity Map, and

Proposed Area of Potential Effects (APE) for Sound Transit West Seattle and



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March 25, 2021

Michael King, Ph.D. Executive Director Southwest Seattle Historical Society 3003 61st Avenue SW Seattle, WA 98116

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Dr. King:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. FTA invited your organization to participate in the Section 106 consultation process for the Project as a Consulting Party, and requested comments on the proposed Area of Potential Effects (APE) in correspondence dated December 7, 2020. Since that time, the Project design has advanced, and Sound Transit has better defined the proposed station locations, station areas, and other Project elements, which require an amendment to the Project APE. This letter requests comments on the amended APE.

FTA looks forward to meeting with you to discuss the Project and the Section 106 process. Pursuant to 36 CFR Part 800, if you have any additional comments on the amended APE, please provide them within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.03.25 06:55:25 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: APE Map Set - West Seattle and Ballard Link Extensions Vicinity Map, and

Proposed Area of Potential Effects (APE) for Sound Transit West Seattle and



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March 25, 2021

Jennifer Mortensen Outreach Director Washington Trust for Historic Preservation 1204 Minor Avenue Seattle, WA 98101

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Mortensen:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. FTA invited your organization to participate in the Section 106 consultation process for the Project as a Consulting Party, and requested comments on the proposed Area of Potential Effects (APE) in correspondence dated August 31, 2020. Since that time, the Project design has advanced, and Sound Transit has better defined the proposed station locations, station areas, and other Project elements, which require an amendment to the Project APE. This letter requests comments on the amended APE.

FTA looks forward to meeting with you to discuss the Project and the Section 106 process. Pursuant to 36 CFR Part 800, if you have any additional comments on the amended APE, please provide them within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.03.25 06:58:45 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: APE Map Set - West Seattle and Ballard Link Extensions Vicinity Map, and

Proposed Area of Potential Effects (APE) for Sound Transit West Seattle and



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March 25, 2021

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Dr. Brooks:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation with the Washington State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. FTA initiated Section 106 consultation with SHPO in correspondence dated February 25, 2019. On February 12, 2020, in correspondence to SHPO, FTA defined the Area of Potential Effects (APE) and provided a proposed Archaeological Survey and Inventory Plan (Plan). SHPO agreed with the APE definition and the contents of the Plan in correspondence to FTA dated February 25, 2020. Since that time, the Project design has advanced, and Sound Transit has better defined the proposed station locations, station areas, and other Project elements, which require an amendment to the Project APE. This letter requests comments on the amended APE.

The enclosed APE Map Set (which includes Project vicinity maps and detailed APE maps) shows both the existing APE and the proposed APE revision. As mentioned above, the APE boundary has been revised to address updated proposed station locations, station areas, and other

March 25, 2021 Page 2

Project elements. In most areas of the Project corridor, this revision resulted in an enlargement of the APE.

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.03.25 05:52:14-07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: APE Map Set - West Seattle and Ballard Link Extensions Vicinity Map, and

Proposed Area of Potential Effects (APE) for Sound Transit West Seattle and

Ballard Link Extensions (March 2021)



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March 25, 2021

The Honorable Jaison Elkins Chairman Muckleshoot Indian Tribe 39015 - 172nd Avenue SE Auburn, WA 98092

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project
National Historic Preservation Act, Section 106, Area of Potential Effects
Amendment; and National Environmental Policy Act, Administrative Draft
Environmental Impact Statement
SHPO Project Tracking Code: 2019-02-01457

## Dear Chairman Elkins:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, and the National Environmental Policy Act (NEPA), and its implementing regulations at 23 CFR Part 771, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses elements of both the Section 106 consultation process, and the NEPA Environmental Impact Statement (EIS) review process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online documents provided in the enclosed *Summary of Sound Transit - West Seattle and Ballard Link Extensions Project Documents*.

# Section 106 Consultation

• Area of Potential Effects (APE) Definition and Proposed Amendment: FTA invites you to review the summary of the Project APE, and to provide feedback on the proposed APE boundary revision.

• Cultural Resources Survey and Inventory Plan (Plan): This Plan was previously transmitted to your Tribe in correspondence dated February 12, 2020. FTA is providing the Plan to you again for review alongside the amended APE, and notes that it has not changed since the February 12, 2020 version.

# NEPA EIS Review and Related Updates

- Administrative Draft EIS: FTA invites you to participate in an early review of the Administrative Draft EIS and associated technical appendices prior to publication of the documents for widespread agency and public comment.
- **Updated EIS Methodologies:** An updated, comprehensive set of EIS methodologies is being shared with you that reflects comments from Cooperating and Participating Agencies.
- Updated Agency and Tribal Coordination Plan: An updated coordination plan is being shared with you that reflects the updated Project schedule.

Pursuant to the Section 106 regulations at 36 CFR Part 800, FTA invites your comments on the APE amendment and Cultural Resources Survey and Inventory Plan within 30 days of receipt of this letter. Pursuant to the NEPA regulations at 23 CFR Part 771, FTA invites your comments on the Administrative Draft EIS within 45 days of receipt of this letter.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2021.03.25
05:58:15 -07'00'

Linda M. Gehrke Regional Administrator

cc: Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe

Madrienne White, Public and Government Relations Manager, Muckleshoot Indian Tribe Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit Dezerae Hayes, Director of Tribal Relations, Sound Transit

Enclosure: Summary of Sound Transit - West Seattle and Ballard Link Extensions Project Documents, including electronic links to the following materials:

- APE Map Set
- Cultural Resources Survey and Inventory Plan
- Administrative Draft EIS and Technical Appendices
- EIS Methodologies

- Agency and Tribal Coordination Plan



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 25, 2021

The Honorable Robert de los Angeles Chairman Snoqualmie Indian Tribe P.O. Box 969 Snoqualmie, WA 98065

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106, Area of Potential Effects Amendment; and National Environmental Policy Act, Administrative Draft Environmental Impact Statement

SHPO Project Tracking Code: 2019-02-01457

## Dear Chairman de los Angeles:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, and the National Environmental Policy Act (NEPA), and its implementing regulations at 23 CFR Part 771, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses elements of both the Section 106 consultation process, and the NEPA Environmental Impact Statement (EIS) review process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online documents provided in the enclosed *Summary of Sound Transit - West Seattle and Ballard Link Extensions Project Documents*.

# Section 106 Consultation

• Area of Potential Effects (APE) Definition and Proposed Amendment: FTA invites you to review the summary of the Project APE, and to provide feedback on the proposed APE boundary revision.

• Cultural Resources Survey and Inventory Plan (Plan): This Plan was previously transmitted to your Tribe in correspondence dated February 12, 2020. FTA is providing the Plan to you again for review alongside the amended APE, and notes that it has not changed since the February 12, 2020 version.

# NEPA EIS Review and Related Updates

- Administrative Draft EIS: FTA invites you to participate in an early review of the Administrative Draft EIS and associated technical appendices prior to publication of the documents for widespread agency and public comment.
- **Updated EIS Methodologies:** An updated, comprehensive set of EIS methodologies is being shared with you that reflects comments from Cooperating and Participating Agencies.
- Updated Agency and Tribal Coordination Plan: An updated coordination plan is being shared with you that reflects the updated Project schedule.

Pursuant to the Section 106 regulations at 36 CFR Part 800, FTA invites your comments on the APE amendment and Cultural Resources Survey and Inventory Plan within 30 days of receipt of this letter. Pursuant to the NEPA regulations at 23 CFR Part 771, FTA invites your comments on the Administrative Draft EIS within 45 days of receipt of this letter.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

Date: 2021.03.25
06:02:42-07'00'

Linda M. Gehrke Regional Administrator

cc: Steven Mullen-Moses, Director, Archeology and Historic Preservation, Snoqualmie Indian Tribe

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit Dezerae Hayes, Director of Tribal Relations, Sound Transit

Enclosure: Summary of Sound Transit - West Seattle and Ballard Link Extensions Project Documents, including electronic links to the following materials:

- APE Map Set
- Cultural Resources Survey and Inventory Plan
- Administrative Draft EIS and Technical Appendices
- EIS Methodologies

- Agency and Tribal Coordination Plan



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March 25, 2021

The Honorable Shawn Yanity Chairman Stillaguamish Tribe of Indians of Washington P.O. Box 277 Arlington, WA 98223-0297

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106, Area of Potential Effects Amendment; and National Environmental Policy Act, Administrative Draft Environmental Impact Statement

SHPO Project Tracking Code: 2019-02-01457

# Dear Chairman Yanity:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, and the National Environmental Policy Act (NEPA), and its implementing regulations at 23 CFR Part 771, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses elements of both the Section 106 consultation process, and the NEPA Environmental Impact Statement (EIS) review process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online documents provided in the enclosed *Summary of Sound Transit - West Seattle and Ballard Link Extensions Project Documents*.

# Section 106 Consultation

• Area of Potential Effects (APE) Definition and Proposed Amendment: FTA invites you to review the summary of the Project APE, and to provide feedback on the proposed APE boundary revision.

• Cultural Resources Survey and Inventory Plan (Plan): This Plan was previously transmitted to your Tribe in correspondence dated February 12, 2020. FTA is providing the Plan to you again for review alongside the amended APE, and notes that it has not changed since the February 12, 2020 version.

# NEPA EIS Review and Related Updates

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- Updated Agency and Tribal Coordination Plan: An updated coordination plan is being shared with you that reflects the updated Project schedule.

Pursuant to the Section 106 regulations at 36 CFR Part 800, FTA invites your comments on the APE amendment and Cultural Resources Survey and Inventory Plan within 30 days of receipt of this letter. Pursuant to the NEPA regulations at 23 CFR Part 771, FTA invites your comments on the Administrative Draft EIS within 45 days of receipt of this letter.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.03.25 06:05:22 -07'00'

Linda M. Gehrke Regional Administrator

cc: Kerry Lyste, Tribal Historic Preservation Officer, Stillaguamish Tribe of Indians of Washington

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit Dezerae Hayes, Director of Tribal Relations, Sound Transit

Enclosure: Summary of Sound Transit - West Seattle and Ballard Link Extensions Project Documents, including electronic links to the following materials:

- APE Map Set
- Cultural Resources Survey and Inventory Plan
- Administrative Draft EIS and Technical Appendices
- EIS Methodologies

- Agency and Tribal Coordination Plan



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March 25, 2021

The Honorable Leonard Forsman Chairman Suquamish Indian Tribe of the Port Madison Reservation P.O. Box 498 Suquamish, WA 98392-0498

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project
National Historic Preservation Act, Section 106, Area of Potential Effects
Amendment; and National Environmental Policy Act, Administrative Draft
Environmental Impact Statement

SHPO Project Tracking Code: 2019-02-01457

## Dear Chairman Forsman:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, and the National Environmental Policy Act (NEPA), and its implementing regulations at 23 CFR Part 771, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses elements of both the Section 106 consultation process, and the NEPA Environmental Impact Statement (EIS) review process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online documents provided in the enclosed *Summary of Sound Transit - West Seattle and Ballard Link Extensions Project Documents*.

# Section 106 Consultation

• Area of Potential Effects (APE) Definition and Proposed Amendment: FTA invites you to review the summary of the Project APE, and to provide feedback on the proposed APE boundary revision.

• Cultural Resources Survey and Inventory Plan (Plan): This Plan was previously transmitted to your Tribe in correspondence dated February 12, 2020. FTA is providing the Plan to you again for review alongside the amended APE, and notes that it has not changed since the February 12, 2020 version.

# NEPA EIS Review and Related Updates

- Administrative Draft EIS: FTA invites you to participate in an early review of the Administrative Draft EIS and associated technical appendices prior to publication of the documents for widespread agency and public comment.
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- Updated Agency and Tribal Coordination Plan: An updated coordination plan is being shared with you that reflects the updated Project schedule.

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If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.03.25 06:13:21 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Lewarch, Tribal Historic Preservation Officer, Suquamish Indian Tribe of the Port Madison Reservation

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Enclosure: Summary of Sound Transit - West Seattle and Ballard Link Extensions Project Documents, including electronic links to the following materials:

- APE Map Set
- Cultural Resources Survey and Inventory Plan
- Administrative Draft EIS and Technical Appendices
- EIS Methodologies

- Agency and Tribal Coordination Plan



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March 25, 2021

The Honorable Teri Gobin Chairwoman Tulalip Tribes of Washington 6406 Marine Drive Tulalip, WA 98271

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project
National Historic Preservation Act, Section 106, Area of Potential Effects
Amendment; and National Environmental Policy Act, Administrative Draft
Environmental Impact Statement

SHPO Project Tracking Code: 2019-02-01457

# Dear Chairwoman Gobin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, and the National Environmental Policy Act (NEPA), and its implementing regulations at 23 CFR Part 771, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses elements of both the Section 106 consultation process, and the NEPA Environmental Impact Statement (EIS) review process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online documents provided in the enclosed *Summary of Sound Transit - West Seattle and Ballard Link Extensions Project Documents*.

# Section 106 Consultation

• Area of Potential Effects (APE) Definition and Proposed Amendment: FTA invites you to review the summary of the Project APE, and to provide feedback on the proposed APE boundary revision.

• Cultural Resources Survey and Inventory Plan (Plan): This Plan was previously transmitted to your Tribe in correspondence dated February 12, 2020. FTA is providing the Plan to you again for review alongside the amended APE, and notes that it has not changed since the February 12, 2020 version.

# NEPA EIS Review and Related Updates

- Administrative Draft EIS: FTA invites you to participate in an early review of the Administrative Draft EIS and associated technical appendices prior to publication of the documents for widespread agency and public comment.
- **Updated EIS Methodologies:** An updated, comprehensive set of EIS methodologies is being shared with you that reflects comments from Cooperating and Participating Agencies.
- Updated Agency and Tribal Coordination Plan: An updated coordination plan is being shared with you that reflects the updated Project schedule.

Pursuant to the Section 106 regulations at 36 CFR Part 800, FTA invites your comments on the APE amendment and Cultural Resources Survey and Inventory Plan within 30 days of receipt of this letter. Pursuant to the NEPA regulations at 23 CFR Part 771, FTA invites your comments on the Administrative Draft EIS within 45 days of receipt of this letter.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M GEHRKE Digitally signed by LINDA M GEHRKE Date: 2021.03.25

Linda M. Gehrke Regional Administrator

cc: Richard Young, Cultural Resources, Hibulb Cultural Center & Natural History Preserve, Tulalip Tribes of Washington

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit Dezerae Hayes, Director of Tribal Relations, Sound Transit

Enclosure: Summary of Sound Transit - West Seattle and Ballard Link Extensions Project Documents, including electronic links to the following materials:

- APE Map Set
- Cultural Resources Survey and Inventory Plan
- Administrative Draft EIS and Technical Appendices
- EIS Methodologies

- Agency and Tribal Coordination Plan



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 25, 2021

The Honorable Delano Saluskin Chairman Confederated Tribes and Bands of the Yakama Nation P.O. Box 151 Toppenish, WA 98948

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project
National Historic Preservation Act, Section 106, Area of Potential Effects
Amendment; and National Environmental Policy Act, Administrative Draft
Environmental Impact Statement

SHPO Project Tracking Code: 2019-02-01457

## Dear Chairman Saluskin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, and the National Environmental Policy Act (NEPA), and its implementing regulations at 23 CFR Part 771, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses elements of both the Section 106 consultation process, and the NEPA Environmental Impact Statement (EIS) review process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online documents provided in the enclosed *Summary of Sound Transit - West Seattle and Ballard Link Extensions Project Documents*.

# Section 106 Consultation

• Area of Potential Effects (APE) Definition and Proposed Amendment: FTA invites you to review the summary of the Project APE, and to provide feedback on the proposed APE boundary revision.

Cultural Resources Survey and Inventory Plan (Plan): This Plan was previously transmitted to your Tribe in correspondence dated February 12, 2020. FTA is providing the Plan to you again for review alongside the amended APE, and notes that it has not changed since the February 12, 2020 version.

# NEPA EIS Review and Related Updates

- Administrative Draft EIS: FTA invites you to participate in an early review of the Administrative Draft EIS and associated technical appendices prior to publication of the documents for widespread agency and public comment.
- Updated EIS Methodologies: An updated, comprehensive set of EIS methodologies is being shared with you that reflects comments from Cooperating and Participating Agencies.
- Updated Agency and Tribal Coordination Plan: An updated coordination plan is being shared with you that reflects the updated Project schedule.

Pursuant to the Section 106 regulations at 36 CFR Part 800, FTA invites your comments on the APE amendment and Cultural Resources Survey and Inventory Plan within 30 days of receipt of this letter. Pursuant to the NEPA regulations at 23 CFR Part 771, FTA invites your comments on the Administrative Draft EIS within 45 days of receipt of this letter.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE GEHRKE Date: 2021.03.23 Date: 2021.03.25

Linda M. Gehrke Regional Administrator

Kate Valdez, Tribal Historic Preservation Officer, Confederated Tribes and Bands of the Yakama Nation

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit Dezerae Hayes, Director of Tribal Relations, Sound Transit

Enclosure: Summary of Sound Transit - West Seattle and Ballard Link Extensions Project Documents, including electronic links to the following materials:

- APE Map Set
- Cultural Resources Survey and Inventory Plan
- Administrative Draft EIS and Technical Appendices
- EIS Methodologies

- Agency and Tribal Coordination Plan



March 26, 2021

Ms. Linda Gehrke Regional Administrator Federal Transit Administration 915 Second Avenue Suite 3142 Seattle, WA. 98174-1002

In future correspondence please refer to: Project Tracking Code: 2019-02-01457

Property: King County\_West Seattle To Ballard Light Rail Extension

Re: Revised APE Concur

Dear Ms. Gehrke:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. In response, we have reviewed your description and map of the revised area of potential effect (APE).

We concur with your definition of the revised APE. These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Should additional information about the project become available, our assessment may be revised.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw Transportation Archaeologist (360) 485-5014

dennis.wardlaw@dahp.wa.gov



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March 30, 2021 Honorable Cecile Hansen Tribal Chair Duwamish Tribe 4708 W Marginal Way SW Seattle, WA 98106

Subject: Sound Transit West Seattle and Ballard Link Extensions Project, National Historic Preservation Act, Section 106 Area of Potential Effect, Cultural Resources Technical Report, Agency and Tribal Coordination plan, and, NEPA EIS Methodologies

### Dear Chairwoman Hansen:

I am writing this letter to the Duwamish Tribe on behalf of Sound Transit's Tribal Relations Program and the West Seattle and Ballard Link Extensions Project (Project). As you are aware, in February of 2018 Sound Transit invited the Duwamish Tribe to be a participating party in the environmental review and Section 106 process for the Project (please see the attached Project engagement information). This letter is a continuation of the engagement on the project initiated in 2018.

This letter is to follow up in order to provide you with updated project specific information and includes:

- 1) A definition of the Area of Potential Effects (APE) Sound Transit invites you to review the APE and provide feedback on the proposed APE revisions.
- 2) **Historic and Archaeological Resources Technical Report** This technical report includes information on early phases of cultural resources work which will inform the Environmental Impact Statement (EIS) for the Project.
- 3) **Updated Agency and Tribal Coordination Plan** This plan identifies key coordination points to solicit continued feedback on the Project during environmental review. It has been updated to provide consistency with the Draft EIS content as well as reflect updated schedule, completed activities and coordination with Tribes and agencies.
- 4) **Updated Environmental Impact Statement (EIS) Methodologies** This technical memorandum provides a comprehensive set of methodologies for the EIS which have been updated to reflect comments Sound Transit has received.

These materials may be accessed via Sound Transit's OneDrive site created specifically for this coordination. This site may be accessed via <a href="https://soundtransit">https://soundtransit</a>

#### CHAIR

#### Kent Keel

University Place Councilmember

#### **VICE CHAIRS**

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King County Executive

#### **Paul Roberts**

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#### **BOARD MEMBERS**

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Snohomish County Executive

## Dave Upthegrove

King County Councilmember

# Peter von Reichbauer

King County Councilmember

## Victoria Woodards

Tacoma Mayor

### **CHIEF EXECUTIVE OFFICER**

Peter M. Rogoff

If there are any questions about this transmittal, or if you would like information on the project schedule, please contact me: Dezerae Hayes – Sound Transit's Director of Tribal Relations by phone at: 253-509-3806 or via email at: Dezerae.hayes@soundtransit.org.

Thank you in advance for your collaboration.

Sincerely,

Dezerae Hayes

**Director of Tribal Relations** 

# **Enclosures:**

Area of Potential Effects Figure Set Historic and Archaeological Resources Technical Report Updated Agency and Tribal Coordination Plan Updated EIS Methodologies

cc: Alexander Stevenson, Sound Transit Erin Green, Sound Transit Lauren Swift, Sound Transit



March 30, 2021 Tribal Chair Snohomish Tribe 9792 Edmonds Way, #267 Edmonds, WA 98020

Subject: Sound Transit West Seattle and Ballard Link Extensions Project, National Historic Preservation Act, Section 106 Area of Potential Effect, Cultural Resources Technical Report, Agency and Tribal Coordination plan, and, NEPA EIS Methodologies

# Dear Chairperson:

I am writing this letter to the Snohomish Tribe on behalf of Sound Transit's Tribal Relations Program and the West Seattle and Ballard Link Extensions Project (Project). As you are aware, in February of 2018 Sound Transit invited the Snohomish Tribe to be a participating party in the environmental review and Section 106 process for the Project (please see the attached Project engagement information). This letter is a continuation of the engagement on the project initiated in 2018.

This letter is to follow up in order to provide you with updated project specific information and includes:

- 1) A definition of the Area of Potential Effects (APE) Sound Transit invites you to review the APE and provide feedback on the proposed APE revisions.
- 2) **Historic and Archaeological Resources Technical Report** This technical report includes information on early phases of cultural resources work which will inform the Environmental Impact Statement (EIS) for the Project.
- 3) **Updated Agency and Tribal Coordination Plan** This plan identifies key coordination points to solicit continued feedback on the Project during environmental review. It has been updated to provide consistency with the Draft EIS content as well as reflect updated schedule, completed activities and coordination with Tribes and agencies.
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These materials may be accessed via Sound Transit's OneDrive site created specifically for this coordination. This site may be accessed via <a href="https://soundtransit-">https://soundtransit-</a>

#### CHAIR

#### Kent Keel

University Place Councilmember

#### **VICE CHAIRS**

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Everett Councilmember

#### **BOARD MEMBERS**

# **Nancy Backus**

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Seattle Mayor

#### **Debora Juarez**

Seattle Councilmember

# Joe McDermott

King County Council Vice Chair

# **Roger Millar**

Washington State Secretary of Transportation

# **Ed Prince**

Renton Councilmember

### Kim Roscoe

Fife Mayor

## **Nicola Smith**

Lynnwood Mayor

### **Dave Somers**

Snohomish County Executive

## Dave Upthegrove

King County Councilmember

# Peter von Reichbauer

King County Councilmember

## Victoria Woodards

Tacoma Mayor

### **CHIEF EXECUTIVE OFFICER**

Peter M. Rogoff

If there are any questions about this transmittal, or if you would like information on the project schedule, please contact me: Dezerae Hayes – Sound Transit's Director of Tribal Relations by phone at: 253-509-3806 or via email at: Dezerae.hayes@soundtransit.org.

Thank you in advance for your collaboration.

Sincerely,

Dezerae Hayes

**Director of Tribal Relations** 

# **Enclosures:**

Area of Potential Effects Figure Set Historic and Archaeological Resources Technical Report Updated Agency and Tribal Coordination Plan Updated EIS Methodologies

cc: Alexander Stevenson, Sound Transit Erin Green, Sound Transit Lauren Swift, Sound Transit



April 30th, 2021

Submitted via email to: <a href="mark.assam@dot.gov">mark.assam@dot.gov</a>

Linda Gehrke Regional Administrator USDOT Federal Transit Administration Region X
915 Second Avenue Federal Building, Suite 3142
Seattle, WA
98174

InterIm CDA Section 106 Consultation Comments

Dear Mr Assam,

We are writing to you as a part of our consultancy in the Section 106 process of the West Seattle to Ballard Link Extension Project (WSBLE). In a recent meeting you invited consultants to provide feedback on the adequacy of the WSBLE Area of Project Effect (APE). I am writing you to educate you on the historical nature of the buildings outside of the already chosen APE.

This project poses both direct and indirect threats to our historic properties throughout the area. Some of these direct impacts include noise and dust. Some of the indirect effects is customers being driven away from the stores that support these buildings' mortgages. The indirect effects can also include resident's being driven away because of the direct effects mentioned. This could lead to the building losing rents and so further harming the historic properties and their owner's ability to sustain them. Finally, this transportation project will further increase property values in the area and drive further development. These properties could face increased neglect as owners see the property value rise and make plans to neglect long needed repairs in the hopes of selling.

For instance, there are 32 historic buildings that have 116 business tenants in them. Many of the business tenants' customers rely on being able to get to and park in the general area of the shops they would like to patronize. Not being able to do so due to bad traffic or a lack of parking due to WSBLE construction would lose these businesses customers, which would certainly jeopardize the sustainability of the historic properties the businesses are located in. It is important to remember that these customers do have other options, as Chinatown-ID no longer has a monopoly as a source of Asian food.

Amongst the same 32 buildings, there are about 1,261 low to moderate income people living in them. The noise, dust, further lack of parking space for their cars, and additional air pollution both directly and indirectly from construction activity will make the Chinatown-International District a less desirable place for these folks to live during this construction. Some of them will be displaced by this activity, further adding to a log arc of government activities and private

forces displacing community members.

Finally, the addition of more transit connections will spur development in a district that is already going through gentrification, which has caused property values to skyrocket. If one looks at property value trends for various properties in the area, the price of land has doubled since 2016. This gentrification and displacement can be seen through the clearing of the Eclipse and Republic hotels. It could also be seen through the significant remodel and clearing of the Publix, and the significant re-modeling and rent increases at the former International Apartments. There are 383 lower income residents living in historic buildings which are at risk of re-development or are otherwise unregulated and could have their rents raised.

We expect the FTA to include the attached list of buildings as a part of the APE. They are all historic in nature and damage to them will need to be mitigated as property owners experience sustainability issues from both residents leaving and businesses losing income. Additionally, the risk of increased development would work to further harm some of these historic assets, as property owners potentially neglect long needed repair with the plans of selling soon, or potentially developers redevelop these properties in insensitive ways compared to their historic nature.

Please let me know if you have any questions. My phone number is 206-962-1574 and email is dlum@interimcda.org.

# List of historical buildings

Sub-neighborhood	Building	
Japantown	Tinico	
	Nippon Kan	
	Panema Hotel	
	NP Hotel	
	Jackson building	
	Far East building	
	C and T building	
Chinatown/Manilatown		
	Evergreen building	
	Atlas hotel	
	Milwaulkee	
	Todd and Chin building	
	NWAAT	
	Hip Wah Hing	
	Bing Kung	
	Kong Yick	

Wing Luke Museum
Louisa Hotel
Rex Apartments
Eastern Hotel
Honeycourt
Hotel Eclipse
Gee How Oak Tin
Chong Wa school
Golden Hong
Ohio apartments
Freedman apartments
Alps apartments
Hong Kong apartments
New Central apartments
Li Retail building
Bush Hotel
Tsue Chong Factory

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915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Dr. Brooks:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation with the Washington State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021.

• Area of Potential Effects (APE) Amendment: On March 25, 2021, in correspondence to SHPO, FTA defined a revised APE boundary. SHPO agreed with the amended APE in correspondence to FTA dated March 26, 2021. Since that time, the Project design has continued to advance, and Sound Transit has recently identified two new construction elements that have been incorporated into the Project, i.e., the temporary relocation of a King County Metro trolley line, and the relocation of a 230-kilovolt power line. Incorporation of these new construction elements into the Project requires a new

amendment to the Project APE. The enclosed APE Map Set (which includes Project vicinity maps and detailed APE maps) shows both the existing APE and the proposed APE revision.

• National Register of Historic Places (NRHP) Eligibility Determination: FTA recognizes the extensive coordination that has occurred with SHPO and Sound Transit on the informal review of Project Historic Property Inventory (HPI) forms and property eligibility recommendations, including the accompanying historic context statements for each segment of the Project. With this letter, FTA is requesting formal SHPO review of the NRHP eligibility determinations for the built environment resources that have been evaluated to date.

Based on the documentation provided through the electronic links described above and identified as enclosures below, FTA has made the following determinations:

- **APE Amendment:** The APE boundary for the Project is amended to include the limits of the recently identified construction elements that have been incorporated into the Project, as depicted on the enclosed APE Map Set.
- Eligibility Determination: There are 290 resources listed on, or eligible for, the NRHP within the Project APE, as identified on the enclosed NRHP Eligibility Determination and Concurrence Tracking Sheet and the NRHP Eligibility Map Set. (Please note, this eligibility determination refers to the March 25, 2021 version of the APE. The areas within the APE amendment addressed in this letter will be surveyed for historic properties after SHPO, Tribes, and additional consulting parties have an opportunity to comment on the APE amendment.)

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE, and requests SHPO concurrence with the eligibility determination, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit September 3, 2021 Page 3

Enclosure: Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021, including links to the following materials:

- APE Map Set
- HPI Forms
- NRHP Eligibility Map Set
- NRHP Eligibility SHPO Informal Review Tracking Sheet
- NRHP Eligibility Determination and Concurrence Tracking Sheet



October 5, 2021

Ms. Linda Gehrke Regional Administrator Federal Transit Administration 915 Second Avenue Suite 3142 Seattle, WA. 98174-1002

In future correspondence please refer to:
Project Tracking Code: 2019-02-01457

Property: King County\_West Seattle To Ballard Light Rail Extension

Re: Revised APE Comments

Dear Ms. Gehrke:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. In response, we have reviewed your description and map of the revised area of potential effect (APE).

Based upon the documentation provided and conversations with consulting parties, we conditionally concur with your definition of the Revised APE with the understanding that important additional information will be forthcoming. Specifically, the SHPO is requesting information on the extent of vibration impacts to Historic Properties; the proposed haul routes through historic districts; the location of construction activities such as staging areas; traffic diversions, easements, etc.; the involvement and/or delegation of any Section 106 responsibilities to other Federal Agencies such as the U.S Coast Guard, and; all information on responses from Interested Tribes to the initial and subsequent APE submittals.

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Should additional information about the project become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw Transportation Archaeologist

(360) 485-5014 dennis.wardlaw@dahp.wa.gov





915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

Eugenia Woo Director of Preservation Services Historic Seattle 1117 Minor Avenue Seattle, WA 98101

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Woo:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

• Area of Potential Effects (APE) Amendment: On March 25, 2021, in correspondence to your organization, FTA defined a revised APE boundary. Since that time, the Project design has continued to advance, and Sound Transit has recently identified two new construction elements that have been incorporated into the Project, i.e., the temporary relocation of a King County Metro trolley line, and the relocation of a 230-kilovolt power line. Incorporation of these new construction elements into the Project requires a new amendment to the Project APE. The enclosed APE Map Set (which includes Project

vicinity maps and detailed APE maps) shows both the existing APE and the proposed APE revision.

• National Register of Historic Places (NRHP) Eligibility Determination: FTA has worked with Sound Transit and the Washington State Historic Preservation Officer (SHPO) to develop Historic Property Inventory (HPI) forms for built environment resources within the APE. For each of these resources, FTA has also made determinations of eligibility for the NRHP. This documentation is enclosed with this letter for your review.

Based on the documentation provided through the electronic links described above and identified as enclosures below, FTA has made the following determinations:

- **APE Amendment:** The APE boundary for the Project is amended to include the limits of the recently identified construction elements that have been incorporated into the Project, as depicted on the enclosed APE Map Set.
- Eligibility Determination: There are 290 resources listed on, or eligible for, the NRHP within the Project APE, as identified on the enclosed NRHP Eligibility Determination Comment Sheet and the NRHP Eligibility Map Set. (Please note, this eligibility determination refers to the March 25, 2021 version of the APE. The areas within the APE amendment addressed in this letter will be surveyed for historic properties after SHPO, Tribes, and additional consulting parties have an opportunity to comment on the APE amendment.)

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE and eligibility determination, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.09.03 11:31:51 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Enclosure: Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021, including links to the following materials:

- APE Map SetHPI Forms
- HPI Guidance Memorandum
- NRHP Eligibility Map SetNRHP Eligibility Determination Comment Sheet



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

Lisa Howard Executive Director Alliance for Pioneer Square P.O. Box 4507 Seattle, WA 98194

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Howard:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

• National Register of Historic Places (NRHP) Eligibility Determination: FTA has worked with Sound Transit and the Washington State Historic Preservation Officer (SHPO) to develop Historic Property Inventory (HPI) forms for built environment resources within the APE. For each of these resources, FTA has also made determinations of eligibility for the NRHP. This documentation is enclosed with this letter for your review.

Based on the documentation provided through the electronic links described above and identified as enclosures below, FTA has made the following determinations:

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- Eligibility Determination: There are 290 resources listed on, or eligible for, the NRHP within the Project APE, as identified on the enclosed NRHP Eligibility Determination Comment Sheet and the NRHP Eligibility Map Set. (Please note, this eligibility determination refers to the March 25, 2021 version of the APE. The areas within the APE amendment addressed in this letter will be surveyed for historic properties after SHPO, Tribes, and additional consulting parties have an opportunity to comment on the APE amendment.)

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE and eligibility determination, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2021.09.03
10:58:34-07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

- APE Map SetHPI Forms
- HPI Guidance Memorandum
- NRHP Eligibility Map SetNRHP Eligibility Determination Comment Sheet



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

Sarah Sodt City Historic Preservation Officer City of Seattle Historic Preservation Office P.O. Box 94649 Seattle, WA 98124-4649

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Sodt:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

• National Register of Historic Places (NRHP) Eligibility Determination: FTA has worked with Sound Transit and the Washington State Historic Preservation Officer (SHPO) to develop Historic Property Inventory (HPI) forms for built environment resources within the APE. For each of these resources, FTA has also made determinations of eligibility for the NRHP. This documentation is enclosed with this letter for your review.

Based on the documentation provided through the electronic links described above and identified as enclosures below, FTA has made the following determinations:

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- Eligibility Determination: There are 290 resources listed on, or eligible for, the NRHP within the Project APE, as identified on the enclosed NRHP Eligibility Determination Comment Sheet and the NRHP Eligibility Map Set. (Please note, this eligibility determination refers to the March 25, 2021 version of the APE. The areas within the APE amendment addressed in this letter will be surveyed for historic properties after SHPO, Tribes, and additional consulting parties have an opportunity to comment on the APE amendment.)

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE and eligibility determination, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2021.09.03
11:22:43 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

- APE Map SetHPI Forms
- HPI Guidance Memorandum
- NRHP Eligibility Map SetNRHP Eligibility Determination Comment Sheet



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

Kathleen Barry Johnson Executive Director Historic South Downtown Community Preservation and Development Authority 409B Maynard Avenue South Seattle, WA 98107

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Barry Johnson:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

• National Register of Historic Places (NRHP) Eligibility Determination: FTA has worked with Sound Transit and the Washington State Historic Preservation Officer (SHPO) to develop Historic Property Inventory (HPI) forms for built environment resources within the APE. For each of these resources, FTA has also made determinations of eligibility for the NRHP. This documentation is enclosed with this letter for your review.

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Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE and eligibility determination, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Digitally signed by LINDA M GEHRKE

GEHRKE

Date: 2021.09.03
14:36:27 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

- APE Map SetHPI Forms
- HPI Guidance Memorandum
- NRHP Eligibility Map SetNRHP Eligibility Determination Comment Sheet



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

Derek Lum Equitable Development Policy Analyst InterIm Community Development Association 310 Maynard Avenue South Seattle, WA 98104

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Mr. Lum:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

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Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

GEHRKE Date: 2021.09.03
12:56:28 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

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915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

Jennifer Meisner Preservation Officer King County Historic Preservation Program 201 South Jackson Street, Suite 700 Seattle, WA 98104

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Meisner:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

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Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

Date: 2021.09.03
12:58:39-07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

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915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

Ryan Smith Principal Martin Smith, Inc. 1932 1st Avenue, Suite 1000 Seattle, WA 98101

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Mr. Smith:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

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Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.09.03
13:01:48 - 07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

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September 3, 2021

Maiko Winkler-Chin Executive Director Seattle Chinatown International District Preservation and Development Authority P.O. Box 3302 Seattle, WA 98114

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Winkler-Chin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

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Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE

Date: 2021.09.03
13:03:52 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

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915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

Michael King, Ph.D. Executive Director Southwest Seattle Historical Society 3003 61st Avenue SW Seattle, WA 98116

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Dr. King:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

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Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.09.03
13:06:19 - 07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

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915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

Jennifer Mortensen Outreach Director Washington Trust for Historic Preservation 1204 Minor Avenue Seattle, WA 98101

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Mortensen:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

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Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE
Date: 2021.09.03
13:08:45-07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

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# Summary of Documents for the West Seattle and Ballard Link Extensions Project

## August 2021

#### **How to Access Documents**

The documents described below can be accessed via the following link:

- Click on the following link: <a href="https://ftp.anchorqea.com/aq">https://ftp.anchorqea.com/aq</a>
- Enter the following username and password (copy and paste recommended)
  - o Username: 170036-01.01@170036-01.01
  - o Password: S0uND 2020!
- To download documents, navigate to a folder and tick the box next to each document you wish to download, then click the **Download** icon at the top of the page.

**Note:** The download feature only works for selected *documents* – while it is possible to tick a box next to a folder, the download feature is unavailable.

### Area of Potential Effects Amendment and Map Set

On March 25, 2021, FTA defined a revised Area of Potential Effects (APE) for the West Seattle and Ballard Link Extensions Project (Project). The Washington State Historic Preservation Officer (SHPO) agreed with the revised APE on March 26, 2021. Since then, the Project design has continued to advance, and Sound Transit has identified two new construction elements that required additional revisions to the APE:

- Temporary relocation of the King County Metro trolley line in the area of South Jackson Street to South Royal Brougham Way, approximately between Maynard Avenue South and Interstate 5/9th Avenue South, within the Chinatown-International District segment
- Relocation of a 230-kilovolt power line along 6th Avenue South and Diagonal Avenue, south of South Spokane Street, leading to the Seattle City Light Substation within the Duwamish segment

Cultural resources within the areas of the revised APE will be inventoried after the APE amendment has been reviewed by SHPO, Tribes, and additional consulting parties.

FTA also received comments on the APE from additional consulting parties. Many of these comments requested that the Seattle Chinatown Historic District, the Pioneer Square-Skid Road Historic District, and the Seattle Center Campus in their entirety be included within the APE. FTA has decided not to expand the APE to incorporate the entirety of these historic districts or the Seattle Center Campus, as such an expansion would be inconsistent with the methodology used to define the original APE, as disclosed in the Section 106 initiation letters to SHPO and Tribes, and the consulting party invitation letters. This methodology was developed to closely align with the APE definition in 36 Code of Federal Regulations (CFR) Part 800.16(d), and FTA's Environmental Standard Operating Procedure Number 21 on the Section 106 Process. FTA acknowledges the concerns raised by the consulting parties regarding Project effects on historic buildings in these areas. FTA would like to emphasize that no adverse effects are

anticipated on individual historic properties outside the currently defined APE. It should also be noted that under Section 106, adverse effects to resources within the APE that are contributing resources to a historic district, are treated as adverse effects on that entire historic district. Consequently, mitigation measures for these adverse effects on contributing resources will address effects on the entire district as well, not just the contributing resources identified within the APE.

Other comments from additional consulting parties requested the inclusion of haul routes within the APE and expressed concern over potential economic and traffic impacts resulting from use of haul routes for the Project. Potential haul routes used temporarily during construction would be existing, heavily used public rights-of-way. Detours and haul routes used temporarily during construction were not included in the APE because of the existing Project environment. These routes would use existing, heavily used public rights-of-way, and therefore are not anticipated to have effects on historic properties. However, it should be noted that economic and traffic impacts resulting from the Project are being analyzed separately in the Draft Environmental Impact Statement (EIS), which FTA and Sound Transit anticipate publishing later this fall.

After considering new Project construction elements and additional consulting party comments, FTA revised the APE. The APE Map Set (which includes Project vicinity maps and detailed APE maps) shows both the March 25, 2021 APE and the proposed APE revision.

Historic Property Inventory Forms and National Register of Historic Places Eligibility FTA and Sound Transit appreciate the extensive coordination with the SHPO built environment staff on the Project Historic Property Inventory (HPI) forms and National Register of Historic Places (NRHP) eligibility evaluations. As shown in Table 1, FTA and Sound Transit provided draft HPI forms for informal SHPO review. SHPO, FTA, and Sound Transit discussed SHPO comments in a series of six workshops, held on May 4, 10, 27, June 1, 10, and 24, 2021. These workshops were conducted primarily with Sound Transit and its consultants, and included FTA. During these meetings Sound Transit documented SHPO comments and how these comments were addressed.

Table 1. WSBLE HPI Form Informal Review Process and Workshops

HPI Form Batch	Date of Sound Transit Transmittal to SHPO	Date of Informal SHPO Comment	Topics Discussed in Comment Workshops
Batches 1–3 Ballard, Interbay, and Lower Queen Anne Batches 1–6 Ballard, Interbay, Lower Queen Anne, South Lake Union, Pioneer Square, Chinatown-International District, and West Seattle	April 21, 2020  January 27, 2021	May 6, 2020  April 16, 2021  May 19, 2021	<ul> <li>Photograph Quality</li> <li>Data Consistency</li> <li>NRHP Significance and Integrity Evaluations</li> <li>Linear Resources</li> <li>Potential Historic District near Spokane Street</li> </ul>
Batch 7 Corridor-Wide	April 27, 2021	May 19, 2021	

In addition to the informal review of HPI forms, on March 29, 2021, FTA transmitted the *West Seattle and Ballard Link Extensions Historic Context and National Register of Historic Places Criterion A Eligibility Requirements* document, as discussed with SHPO staff in previous meetings. This document was developed to establish a basis for NRHP eligibility evaluations for all NRHP criteria, and specifically focused on Criterion A.

The website (accessed by the links above) includes 1,291 HPI forms, which have also been uploaded to the Washington Information System for Architectural and Archaeological Records Database (WISAARD). As discussed with SHPO built environment staff, the HPI forms have been reorganized from the previous "Batch" structure into "Segments" that correspond to geographic Project segments used for discussion in the Project EIS.

# NRHP Eligibility Map Set

The NRHP Eligibility Map Set is a series of maps that include a unique property identification number (WSBLE ID # [see below]) and FTA's formal NRHP eligibility determinations for built environment resources within the March 25, 2021 APE. The Map Set also includes NRHP eligibility information for resources where NRHP status has been established and is not modified by the Project.

## NRHP Eligibility SHPO Informal Review Tracking Sheet

This Excel-based tracking sheet includes the history of SHPO review comments on HPI forms provided during the informal review process, including the workshops outlined in Table 1. This tracking sheet is provided as a record of continued consultation and outcomes of that process.

#### NRHP Eligibility Determination and Concurrence Tracking Sheet

This Excel-based tracking sheet facilitates formal review and continued consultation on NRHP eligibility and includes the following headings:

**WSBLE ID** # – Individual numerical identification for each resource within the WSBLE dataset

**Sub ID** – If a property includes multiple resources each was given a unique alphabetical ID beyond its WSBLE ID

**WSBLE Batch No.** – Indicates the batch the HPI form was previously grouped within during informal SHPO review.

**Segment** – Indicates the Project segment in which each resource is located

**WISAARD Property** # – Unique property ID as indicated in the WISAARD database

**Parcel** # – County parcel number

**Build Date** – Date a resource was constructed and any dates the resource was modified

**Property Name** – Name of resource as indicated on the HPI form

**Property Address** – Street address for resource

**Eligibility Determination** – Identifies FTA's NRHP eligibility determination based on research conducted by Sound Transit and their consultant team

Eligibility Concurrence – SHPO entry column to indicate concurrence decision: please note here whether you agree with the eligibility determination (i.e., "concur" or "do not concur")

The tracking sheet includes an individual tab for each Project segment, as well as an "All" tab that includes all resources and a tab labelled "Linear (multiple segments)" that contains information for resources that span multiple Project segments.



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

The Honorable Jaison Elkins Chairman Muckleshoot Indian Tribe 39015 - 172nd Avenue SE Auburn, WA 98092

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

#### Dear Chairman Elkins:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

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Thank you for your consultation on the Project.

Sincerely,

Digitally signed by LINDA M GEHRKE

GEHRKE
Date: 2021.09.03
14:48:11 - 07'00'

Linda M. Gehrke Regional Administrator

cc: Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe
Madrienne White, Public and Government Relations Manager, Muckleshoot Indian Tribe
Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology
and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit September 3, 2021 Page 3

- APE Map Set
- HPI Forms
- NRHP Eligibility Map Set
- NRHP Eligibility Determination Comment Sheet



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

The Honorable Robert de los Angeles Chairman Snoqualmie Indian Tribe P.O. Box 969 Snoqualmie, WA 98065

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Chairman de los Angeles:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

• Area of Potential Effects (APE) Amendment: On March 25, 2021, in correspondence to your Tribe, FTA defined a revised APE boundary. Since that time, the Project design has continued to advance, and Sound Transit has recently identified two new construction elements that have been incorporated into the Project, i.e., the temporary relocation of a King County Metro trolley line, and the relocation of a 230-kilovolt power line. Incorporation of these new construction elements into the Project requires a new amendment to the Project APE. The enclosed APE Map Set (which includes Project

vicinity maps and detailed APE maps) shows both the existing APE and the proposed APE revision.

• National Register of Historic Places (NRHP) Eligibility Determination: FTA has worked with Sound Transit and the Washington State Historic Preservation Officer (SHPO) to develop Historic Property Inventory (HPI) forms for built environment resources within the APE. For each of these resources, FTA has also made determinations of eligibility for the NRHP. This documentation is enclosed with this letter for your review.

Based on the documentation provided through the electronic links described above and identified as enclosures below, FTA has made the following determinations:

- **APE Amendment:** The APE boundary for the Project is amended to include the limits of the recently identified construction elements that have been incorporated into the Project, as depicted on the enclosed APE Map Set.
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Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE and eligibility determination, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Digitally signed by LINDA M GEHRKE Date: 2021.09.03 14:43:08 -07'00'

Linda M. Gehrke Regional Administrator

cc: Steven Mullen-Moses, Director, Archeology and Historic Preservation, Snoqualmie Indian Tribe

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit September 3, 2021 Page 3

Enclosure: Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021, including links to the following materials:

- APE Map Set
- HPI Forms
- NRHP Eligibility Map Set
- NRHP Eligibility Determination Comment Sheet



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

The Honorable Shawn Yanity Chairman Stillaguamish Tribe of Indians of Washington P.O. Box 277 Arlington, WA 98223-0297

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Chairman Yanity:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

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vicinity maps and detailed APE maps) shows both the existing APE and the proposed APE revision.

• National Register of Historic Places (NRHP) Eligibility Determination: FTA has worked with Sound Transit and the Washington State Historic Preservation Officer (SHPO) to develop Historic Property Inventory (HPI) forms for built environment resources within the APE. For each of these resources, FTA has also made determinations of eligibility for the NRHP. This documentation is enclosed with this letter for your review.

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Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE and eligibility determination, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M GEHRKE Digitally signed by LINDA M GEHRKE Date: 2021.09.03 09:49:22 -07'00'

Linda M. Gehrke Regional Administrator

cc: Kerry Lyste, Tribal Historic Preservation Officer, Stillaguamish Tribe of Indians of Washington

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit September 3, 2021 Page 3

Enclosure: Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021, including links to the following materials:

- APE Map Set
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REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

The Honorable Leonard Forsman Chairman Suquamish Indian Tribe of the Port Madison Reservation P.O. Box 498 Suquamish, WA 98392-0498

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

# Dear Chairman Forsman:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

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vicinity maps and detailed APE maps) shows both the existing APE and the proposed APE revision.

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Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE and eligibility determination, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.09.03 14:45:41 -07'00'

Linda M. Gehrke Regional Administrator

cc: Dennis Lewarch, Tribal Historic Preservation Officer, Suquamish Indian Tribe of the Port Madison Reservation

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit September 3, 2021 Page 3

Enclosure: Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021, including links to the following materials:

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- NRHP Eligibility Determination Comment Sheet



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

The Honorable Teri Gobin Chairwoman Tulalip Tribes of Washington 6406 Marine Drive Tulalip, WA 98271

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

# Dear Chairwoman Gobin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

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Thank you for your consultation on the Project.

Sincerely,

LINDA M Digitally signed by LINDA M GEHRKE Date: 2021.09.03 14:40:43 -07'00'

Linda M. Gehrke Regional Administrator

cc: Richard Young, Cultural Resources, Hibulb Cultural Center & Natural History Preserve, Tulalip Tribes of Washington

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit September 3, 2021 Page 3

Enclosure: Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021, including links to the following materials:

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- NRHP Eligibility Determination Comment Sheet



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

September 3, 2021

The Honorable Delano Saluskin Chairman Confederated Tribes and Bands of the Yakama Nation P.O. Box 151 Toppenish, WA 98948

**Subject: Sound Transit** 

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment, and Eligibility Determination

SHPO Project Tracking Code: 2019-02-01457

# Dear Chairman Saluskin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle and Ballard Link Extensions Project (Project). The Project would extend Link light rail service from downtown Seattle to West Seattle's Alaska Junction area, and to Ballard's Market Street area in Seattle, King County, Washington. This letter addresses two elements of the Section 106 consultation process, and provides documentation for your review and feedback. These elements are summarized in the bulleted list below, with additional details and electronic links for accessing online enclosure documents provided in the enclosed *Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021*.

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Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE and eligibility determination, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Digitally signed by LINDA M GEHRKE Date: 2021.09.03

Linda M. Gehrke Regional Administrator

cc: Kate Valdez, Tribal Historic Preservation Officer, Confederated Tribes and Bands of the Yakama Nation

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit September 3, 2021 Page 3

Enclosure: Summary of Documents for the West Seattle and Ballard Link Extensions Project, August 2021, including links to the following materials:

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September 20, 2021 Honorable Cecile Hansen Tribal Chair Duwamish Tribe 4708 W Marginal Way SW Seattle, WA 98106

Subject: Sound Transit West Seattle and Ballard Link Extensions Project, National Historic Preservation Act, Section 106 Area of Potential Effect, Historic Property Inventory Forms and NRHP Eligibility Determinations

Dear Chairwoman Hansen:

I am writing this letter to the Duwamish Tribe on behalf of Sound Transit's Tribal Relations Program and the West Seattle and Ballard Link Extensions Project (Project). Sound Transit is working with the Federal Transit Administration (FTA) on this Project. As you are aware, in February of 2018 Sound Transit invited the Duwamish Tribe to be a participating party in the environmental review and Section 106 process for the Project (please see the attached Project engagement information). This letter is a continuation of the engagement on the project initiated in 2018.

This letter is intended to provide you with updated project specific information and includes:

- 1) Amendment of the Area of Potential Effects (APE) Sound Transit invites you to review the APE and provide feedback on the amended APE defined by the FTA.
- 2) National Register of Historic Places (NRHP) Eligibility Determinations Sound Transit has worked with the Washington State Historic Preservation Officer (SHPO) to develop historic property inventory (HPI) forms for built environment resources within the APE. FTA has made determinations of eligibility for the NRHP on these resources and these determinations are enclosed for your review and comment. There are a total of 290 resources listing on, or eligible for the NRHP within the APE as identified on the enclosed NRHP Eligibility Determination Comment Sheet and NRHP Eligibility Map Set. The areas within the APE amendment addressed in this letter will be subject to survey and NRHP eligibility determinations after the SHPO, Tribes, and additional consulting parties have had an opportunity to comment on the APE amendment.

Additional details and electronic links for accessing online enclosure documents may be accessed at Sound Transit's OneDrive site created specifically for this coordination. This site may be accessed via <a href="https://soundtransit-">https://soundtransit-</a>

#### CHAIR

#### Kent Keel

University Place Councilmember

#### **VICE CHAIRS**

#### **Dow Constantine**

King County Executive

#### **Paul Roberts**

Everett Councilmember

#### **BOARD MEMBERS**

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# Peter von Reichbauer

King County Councilmember

#### Victoria Woodards

Tacoma Mayor

#### **CHIEF EXECUTIVE OFFICER**

Peter M. Rogoff

my.sharepoint.com/:f:/g/personal/erin green soundtransit org/Evl70R1tgGZLmRhXnsX9RLUBa2JSdMg3cxs0mb Fyvq0Mrg?e=GYx8ku and is currently set up to provide you specifically with access. If you wish to have a staff member access the information please contact us and we can assign that individual access. This OneDrive site includes a *Summary of Documents for the West Seattle and Ballard Link Extensions Project* document that describes the enclosures and APE amendment in detail and is also attached here.

If there are any questions about this transmittal, or if you would like information on the project schedule, please contact me: Dezerae Hayes – Sound Transit's Director of Tribal Relations by phone at: 253-509-3806 or via email at: Dezerae.hayes@soundtransit.org.

Thank you in advance for your collaboration.

Sincerely,

Dezerae Hayes

Director of Tribal Relations

Dezerae Hayes

Enclosures (on OneDrive):

- -Summary of Documents for the West Seattle and Ballard Link Extensions Project
- -APE Map Set
- -HPI Forms
- -NRHP Eligibility Map Set
- -NRHP Eligibility Determination Comment Sheet

cc: Alexander Stevenson, Sound Transit Erin Green, Sound Transit Lauren Swift, Sound Transit **From:** Hayes, Dezerae <Dezerae.Hayes@soundtransit.org>

**Sent:** Monday, September 27, 2021 1:43:26 PM

To: Cecile < Cecile@duwamishtribe.org>

Subject: Re: West Seattle Ballard Link Extension APE

Thank you. If you would like to set up a briefing or have any questions please let me know:) I am here to help facilitate and ensure our voices are heard as Indigenous people.

Siokwil - Dez

Dezerae Hayes – PhD-ABD Director of Tribal Relations Office: 206-553-3563 Cell: 253-509-3806

sound-transit (2)

From: Cecile < Cecile@duwamishtribe.org>
Sent: Monday, September 27, 2021 1:40:41 PM

**To:** Hayes, Dezerae <Dezerae.Hayes@soundtransit.org> **Subject:** RE: West Seattle Ballard Link Extension APE

**CAUTION:** This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Running rather late and for the record thanks for sharing with the Duwamish Tribal Council. Thank you, Cecile Hansen, Chair

**From:** Hayes, Dezerae <Dezerae.Hayes@soundtransit.org>

**Sent:** Monday, September 20, 2021 1:02 PM

**To:** duwamish tribe <duwamishtribe@duwamishtribe.org>; Cecile <Cecile@duwamishtribe.org>; Cecile <Cecile@duwamishtribe.org>

 $\textbf{Cc:} \ Green, Erin < erin.green@soundtransit.org>; Stevenson, Alex < alex.stevenson@soundtransit.org>; Stevenson.green@soundtransit.org>; Stevenson.green@soundtransit.org>; Stevenson.green@soundtransit.org>; Stevenson.gree$ 

**Subject:** West Seattle Ballard Link Extension APE

Good Afternoon Chairwoman Hansen,

Please see the attached letter for an update regarding the West Seattle Ballard Link Extension Project.

If you would like to meet via zoom – please let me know and I would be happy to do so.

Best – Dez

# Dezerae Hayes - PhD-ABD

Director of Tribal Relations
Executive Department Government and Community Relations
Chairwoman – Washington State Tribal Traffic Safety Advisory Board

Office: 206-553-3563 Cell: 253-509-3806





October 5, 2021

Ms. Linda Gehrke Regional Administrator Federal Transit Administration 915 Second Avenue Suite 3142 Seattle, WA. 98174-1002

In future correspondence please refer to:
Project Tracking Code: 2019-02-01457

Property: King County\_West Seattle To Ballard Light Rail Extension

Re: Revised APE Comments

Dear Ms. Gehrke:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. In response, we have reviewed your description and map of the revised area of potential effect (APE).

Based upon the documentation provided and conversations with consulting parties, we conditionally concur with your definition of the Revised APE with the understanding that important additional information will be forthcoming. Specifically, the SHPO is requesting information on the extent of vibration impacts to Historic Properties; the proposed haul routes through historic districts; the location of construction activities such as staging areas; traffic diversions, easements, etc.; the involvement and/or delegation of any Section 106 responsibilities to other Federal Agencies such as the U.S Coast Guard, and; all information on responses from Interested Tribes to the initial and subsequent APE submittals.

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Should additional information about the project become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw Transportation Archaeologist

(360) 485-5014 dennis.wardlaw@dahp.wa.gov



This page is intentionally left blank.

 From:
 Sodt, Sarah

 To:
 Assam, Mark (FTA)

Subject: RE: Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Area of Potential Effects

Amendment, and Eligibility Determination

Date: Wednesday, October 6, 2021 6:00:37 PM

Attachments: <u>image001.png</u>

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

### Hi Mark,

I've reviewed all the documents that you provided. I still have concerns about resources within the haul/detour routes particularly related to the areaways that exist throughout the CID, Pioneer Square and elsewhere in Downtown. It does not appear that areaways have been evaluated inside or outside the currently proposed APE. Can you please confirm that is true, or point me to the evaluation of those resources – perhaps I have missed them?

I've also reviewed each of HPI forms, and one built resource that raised concern for me in terms of the eligibility determination is the Ascona/Alki Hotel at 200 5<sup>th</sup> Avenue. I would like to understand a bit more about why the consultants determined it not eligible.

Thanks for the opportunity to comment, and I look forward to future convenings of the consulting parties to discuss this further.

Sarah

# Sarah Sodt

# **City Historic Preservation Officer**

Office: 206.615.1786

Street Address: 600 4th Avenue - 4th Floor, Seattle WA 98104 Mailing Address: PO Box 94649, Seattle WA 98124-4649

seattle.gov/neighborhoods



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Public Disclosure/Disclaimer Statement: Consistent with the Public Records Act, Chapter 42.56 RCW, all records within the possession of the City may be subject to a public disclosure request and may be distributed or copied. Records include and are not limited to sign-in sheets, contracts, emails, notes, correspondence, etc. Use of lists of individuals or directory information (including address, phone or E-mail) may not be used for commercial purposes.

From: Assam, Mark (FTA) < Mark. Assam@dot.gov>

**Sent:** Tuesday, September 7, 2021 3:34 PM **To:** Sodt, Sarah <Sarah.Sodt@seattle.gov>

Cc: Wardlaw, Dennis (DAHP) <dennis.wardlaw@dahp.wa.gov>; Hayes, Dezerae

<Dezerae.Hayes@soundtransit.org>; Swift, Lauren <lauren.swift@soundtransit.org>; Stevenson,

Alex <alex.stevenson@soundtransit.org>; Ziglar, Kristine (FTA) <Kristine.Ziglar@dot.gov>;

Changchien, Amy (FTA) <amy.changchien@dot.gov>; Ann Costanza (acostanza@anchorqea.com)

<acostanza@anchorqea.com>; Barbara Bundy <bbundy@anchorqea.com>; fta.tro10mail

<fta.tro10mail@dot.gov>

**Subject:** Sound Transit - West Seattle and Ballard Link Extensions Project - NHPA Section 106 Area of Potential Effects Amendment, and Eligibility Determination

# **CAUTION: External Email**

Dear Ms. Sodt:

Please see the attached Section 106 Area of Potential Effects Amendment, and Eligibility Determination letter for the Sound Transit - West Seattle and Ballard Link Extensions Project. Please note, due to e-mail attachment file-size limitations, the referenced enclosure documents are not attached to this e-mail message. The enclosure documents are described in the attached summary document, and may be downloaded from the following URL:

https://ftp.anchorgea.com/aq

Username: <u>170036-01.01\_5c@170036-01.01\_5c</u>

Password: WSBLE21!

Please let me know if you have questions, or any trouble downloading the files.

Thanks,

Mark A. Assam, AICP

U.S. Department of Transportation Federal Transit Administration, Region X 915 2nd Avenue, Suite 3142 | Seattle, WA 98174-1002 (206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov



October 6, 2021

Linda Gehrke
Regional Administrator, Region 10
US Department of Transportation
Federal Transit Administration

Subject: Sound Transit

West Seattle and Ballard Link Extension Project National Historic Preservation Act, Section 106

Consulting Party Comments on Revised Area of Potential Effects and Eligibility

Determination

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Gehrke:

We have reviewed the revised Area of Potential Effect for the West Seattle and Ballard Link Extensions Project (West Seattle/Ballard Link, hereafter), and respectfully submit these comments for your consideration as we continue the Section 106 consulting process. We offer you this context so that you may understand our concerns about the effects of project haul routes and traffic diversion throughout the Pioneer Square neighborhood.

Areaways that were created under the sidewalks when the street elevation of Pioneer Square was raised one story after the Great Seattle Fire are a central reason the Pioneer Square Historic District was created. They are now imperiled, and any increase in traffic through the Pioneer Square neighborhood puts them at greater risk.

In the early 1960s, the destruction of the elegant Seattle Hotel and its subsequent replacement with a parking garage known as the 'Sinking Ship Garage' spawned a grassroots preservation movement to save Pioneer Square from the wrecking ball. A series of newspaper articles piqued curiosity about underground areaways in Pioneer Square, which led to the creation of a tour of the areaways. The tour was created as a means to engage the public in signing petitions for the preservation of the Square. Later the areaways tour, Seattle Underground, became a fixture in the neighborhood by drawing tourists to the area. By 1970, Pioneer Square was Seattle's first Historic District. Eventually, individual buildings, such as the Pioneer Building, received individual historic designations.

With their unique role in the history of the rebuilding of Seattle, areaways have been a defining characteristic of the historic district since it was established. Every year, public and private entities invest hundreds of thousands of dollars repairing Pioneer Square's areaways, replacing the characteristic

WSBLE Section 106 APE October 6, 2021 Page 2 of 3

glass blocks in the sidewalk that light the underground, and seeking Pioneer Square Preservation Board approval to make improvements, changes, or decommission.

Maintaining areaways throughout our neighborhood is a shared responsibility. The City of Seattle, through Seattle Department of Transportation, is responsible for the streetwall—the wall of the areaway that holds up the street. Private property owners pay fees to the City each year for the privilege of using the space within the areaways, despite its condition, and are responsible for maintaining all other elements of the space, like the floors, and often the "ceiling," which is the sidewalk above.

But, the areaways are now more than 130 years old. They were built when the heaviest vehicles on the streets held up by their outer walls were horse-drawn delivery wagons. And they are deteriorating, which means that Pioneer Square is at risk of losing these unique spaces.

The City of Seattle, through the Department of Transportation, has long been aware of its responsibility to maintain the streetwalls of the areaways, and from 2004 through 2018, the Capital Improvement Program appropriated money to a program called "Hazard Mitigation Program—Areaways" under the Bridge and Structures organization of the department. The annual funding for that program varied over the 16 years between \$212,000 at its lowest, to \$400,000 at its peak (earliest budget this author could find). It is unclear if the money invested in the program was used to fund a person or persons to maintain a database of the resource, or to perform any real capital work on maintaining or preserving the resource?

Over that 16 years, most municipal improvements to areaways have typically been associated with construction projects like the Alaskan Way Viaduct program, Waterfront redevelopment, the First Hill Streetcar, and various utility and repair projects performed by State and City agencies.

Despite funding a program identified as a "mitigation" program, SDOT and the City of Seattle have failed to maintain the areaways resource as a part of the transportation system, or as part of the historic character of Seattle's oldest neighborhood.

In 2018, Seattle Department of Transportation (SDOT) started assessing what streets they could relocate buses to while the viaduct was being demolished and Alaskan Way rebuilt. They conducted a structural analysis of the underground areaways in Pioneer Square to determine if the 1st Ave S corridor could accept the additional bus traffic. The analysis highlighted just how bad the areaways situation had become, and SDOT initiated an intense assessment to map critical areaway structural vulnerabilities throughout the neighborhood. It turns out, most areaways in the neighborhood are very vulnerable to damage. So much so, that SDOT has imposed weight restrictions throughout all the main arterials in the neighborhood. Curb lanes all along 1st Avenue South from Cherry Street to King Street, and South Jackson Street from 1st Avenue South to 2nd Avenue South are limited to vehicles weighing 10,000 lbs or less, meaning commercial vehicles delivering goods to businesses, and trucks delivering items to residences must park blocks away from their destinations.

SDOT reports that it will complete its assessment of the structures throughout the neighborhood, determine the work necessary, and begin to create a long-range plan. Currently, SDOT does not have a long-range plan for the areaways. In late 2020, areaways program leads presented to the neighborhood, and indicated that program goals will focus on safety for vehicles and pedestrians, and mobility to reduce restricted load zones throughout the neighborhood. At this time, the neighborhood continues to

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suffer from a lack of City investments to maintain its part of the historic resource. It is the extremely delicate condition of the areaways, combined with the necessary restrictions on traffic throughout the neighborhood, which makes us very concerned about the ripple effects of diverted traffic throughout the neighborhood that will necessarily follow the disruption as Sound Transit constructs the new downtown tunnel and the West Seattle line.

1st Avenue South continues to be an important corridor in Pioneer Square, and one of the few arterials that can bring people and goods into and out of downtown Seattle. But increasing traffic on 1st Avenue South will necessarily divert traffic onto other streets in Pioneer Square, where both the condition of the areaways and the existing challenges with commercial deliveries make additional traffic extremely problematic. We encourage the Sound Transit team to closely consider the current deteriorating condition of the existing transportation network, including the critical historic areaways, as they evaluate the effects of the West Seattle/Ballard Link Extensions project, and continue to plan for construction.

We appreciate the partnership with Sound Transit, the Federal Transit Administration, our State Historic Preservation Officer, Dr. Allyson Brooks and her staff at Washington State Department of Archaeologic and Historic Preservation. We look forward to collectively working together to protect our defining historic resources during the planning, construction, and operation of the West Seattle/Ballard Link Extension.

Sincerely,

Lisa Dixon Howard

Lisa Dixon Howard
Executive Director
Alliance for Pioneer Square

Cc: Mark Assam, Planner, US Department of Transportation Federal Transit Administration Cathal Ridge, Executive Corridor Director, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit Alex Stevenson, Cultural Resources Program Manager, Sound Transit

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October 6, 2021

Linda Gehrke Region X Administrator US DOT FTA 915 Second Ave. Suite 3142 Seattle, WA 98174-1002

Dear Ms. Gehrke:

We have reviewed the revised Area of Potential Effect boundaries, and the NRHP eligibility determination and offer the following comments and context for your consideration as we continue the Section 106 process. We offer you the following context so that you understand why we are requesting Sound Transit include the boundaries of the Pioneer Square and Chinatown historic districts, and the haul routes, as part of the Area of Potential effect.

# CHINATOWN HISTORIC DISTRICT CONTEXT

The Seattle Chinatown Historic District is listed in the National Register of Historic places, and sits within the larger International Special Review District. The Chinatown Historic District has been the center of Seattle's Asian community since the early 20<sup>th</sup> century, and the International Special Review District was established to preserve the area's Asian culture and history and protect it from unwanted development. We rely on robust consideration of the elements identified for protection under various federal, state, and city laws to help protect the place of Chinatown, and the culture of the Chinatown International District neighborhood.

The neighborhood is home to one of the largest groups of intact pre-World War II buildings in Seattle, and these buildings stand to reflect the history and historic architecture of the community. Areaways were created during the regrades to rebuild the City after the Great Seattle Fire of 1889, and during the disruptive Jackson Regrade of the 1900s. These elements are defining characteristics of the historic nature of the neighborhood, and no matter what alternative being studied by Sound Transit for the West Seattle and Ballard project, the project will have a substantial construction footprint right in the middle of these important resources and the existing culture. The project itself will include construction of a new downtown tunnel, and based on our most recent experience with the 3<sup>rd</sup> Avenue Bus Tunnel, and the Alaskan Way Viaduct tunnel, we know that settlement and vibrations can have tremendous



impact on surrounding buildings, sidewalks, and streets. Other Section 106 consulting processes throughout the City of Seattle in recent decades have focused on the effects of noise, dust, and vibrations to historic buildings and districts, and have even regarded potentially historic resources only under consideration for listing on the National Register of Historic Places. The Seattle Chinatown Historic District is a designated resource, and the proposed project being constructed through the heart of the district will undoubtedly have district-wide impacts. It is for this reason that we are requesting, again, that the Seattle Chinatown Historic District be included in its entirety, in the Area of Potential Effect.

The International Special Review District was created to help preserve the culture of the neighborhood, which is oftentimes reflected in the way day-to-day life unfolds in the neighborhood. Indeed, this neighborhood's history of destruction and rebuild and relocation has been a reflection of racist based actions and policies perpetuated over time, that have failed to protect the physical structures that would otherwise visually define the culture we describe, and provide for more clear protections under Section 106 of the National Historic Preservation Act. The Chinatown International District of today reflects the varied and diverse ethnic communities who have been lashed together in this neighborhood space. The small scale and pedestrian nature of the neighborhood is emphasized by the numbers of elders who live and walk in the district every day. The ability for a resident or visiting elder to walk to the grocery, to a park, to a doctor's appointment or other service is a critical function of the neighborhood culture. Our concern is that the disruption caused by the WSBLE project planning and construction will create pressures on the local businesses and residents that will increase displacement and discourage new residents and businesses from trying to find their place in our communities. In a community like the Chinatown International District, we are talking about discouraging Asian-Pacific-Islander immigrants from investing in the businesses that define the culture of the C-ID. Our ethnic groceries, Anime and Manga stores, restaurants, traditional herb stores, night clubs and coffee shops are living, breathing expressions of the Chinese/Fillipino/Vietnamese/Japanese and other immigrant experience. Sound Transit needs to consider the full direct and indirect impacts of the project on these day-to-day activities on the cultural fabric, to preserve and protect what defines the district in the context of Section 106, and arguably, in the spirit of Section 106, as well.

# PIONEER SQUARE HISTORIC DISTRICT

Here, we are re-emphasizing the points made by our partners at the Alliance for Pioneer Square, about the current vulnerability of the areaways throughout Pioneer Square and the City, and the importance of their historic contribution.

Areaways were created when the City rebuilt itself after the Great Seattle Fire. These structures are made up of streetwalls that hold up the streets throughtout the neighborhood, plus the sidewalks and building faces within these underground spaces. Many of them are corridors for underground utilities, as well as storage areas, or extensions of businesses and restaurants.



Areaways, in their role of rebuilding Seattle, are now more than 130 years old, and deteriorating due to chronic underinvestment in maintenance. This means Pioneer Square and Chinatown International District are both at risk of losing these unique spaces. During the construction of the City's latest megaproject, the construction of the Alaskan Way Tunnel, and the demolition of the Alaskan Way Viaduct, the Seattle Department of Transportation started assessing what streets they could relocate bus traffic to while the viaduct was being demolished. They conducted a structural analysis of the underground areaways in Pioneer Square to determine if the 1st Ave S corridor could accept the additional bus traffic. The analysis highlighted just how bad the areaways situation has become, and SDOT initiated an intense assessment to map critical areaway structural vulnerabilities throughout the neighborhood. It turns out, most areaways in the Pioneer Square neighborhood are very vulnerable to damage. So much so, that SDOT has imposed weight restrictions throughout all the main arterials in the neighborhood. Curb lanes all along 1st Avenue South from Cherry Street to King Street, and South Jackson Street from 1st Avenue South to 2nd Avenue South are limited to vehicles weighing 10,000 lbs or less, meaning commercial vehicles delivering goods to businesses, and trucks delivering items to residences must park blocks away from their destinations.

These streets are the very streets that Sound Transit will likely have to use to get construction vehicles to and from the construction site for the WSBLE project—anticipated to be 7- 10 years of construction in this area. At this time, the Pioneer Square neighborhood continues to suffer from a lack of City investments to maintain its part of the historic resource. It is the extremely delicate condition of the areaways, combined with the necessary restrictions on traffic throughout the neighborhood, that makes us very concerned about the ripple effects of diverted traffic throughout the neighborhood, and the related construction traffic that will undoubtedly have to travel through the neighborhood, that will necessarily follow the disruption as Sound Transit constructs the new downtown tunnel and the West Seattle line.

Noise, dust, vibration, and increased traffic all will continue to erode the conditions of these areaways, and we request Sound Transit do a more explicit and thorough examination of the effects of the project on these defining historic resources throughout Pioneer Square.

Our requests to include the designated Seattle Chinatown and Pioneer Square historic districts, and project haul routes in the Area of Potential Effect are not new requests to Section 106 review in Seattle. These considerations have become standard practice with major projects in the region, including the SR 99 Alaskan Way Viaduct program projects, and the SR 520 program projects. We are requesting the same robust Section 106 review consistency that has been applied throughout the City of Seattle in the past two decades.

We appreciate the ongoing collaboration with Sound Transit, and the Federal Transit Administration, and we look forward to collectively working together to meet the needs of our community for the



successful construction and operation of this important, multigenerational, 100-year transportation project.

Sincerely,

Kathleen Barry Johnson Executive Director

CC: Mark Assam, Lauren Swift, Alex Stevenson, Kristine Ziglar, Amy Changchien, Ann Costanza, Barbara Bundy

# Martin Smith Inc

October 7, 2021

Mark A. Assam, AICP U.S. Department of Transportation Federal Transit Administration, Region X 915 2nd Avenue, Suite 3142 Seattle, WA 98174-1002

Subject: Sound Transit West Seattle and Ballard Link Extension Project

Comments on Revised Area of Potential Effects and Eligibility Determination

Dear Mr. Assam:

Martin Smith Inc has reviewed the revised Area of Potential Effect for the West Seattle and Ballard Link Extensions Project (West Seattle/Ballard Link, hereafter), and we submit these comments as we continue the Section 106 consulting process.

First, we echo the context-setting comments that our collaborators at the Alliance for Pioneer Square and Historic South Downtown offered to you in their letters, about the nature of the Pioneer Square and Chinatown Historic Districts. Both these districts are listed historic resources and the project will have a substantial footprint in each, no matter what alternative is selected for the West Seattle and Ballard Link Extension project. A new downtown tunnel will require Sound Transit to remove hundreds of thousands of cubic yards of soil from the tunnel portals. Those thousands of truckloads of soil will travel from the portals, to wherever the disposal sites are. Those haul routes will undoubtedly pass around or through the Chinatown and Pioneer Square historic districts. Noise, dust, vibration, and vehicle weight on the streets of these neighborhoods will have direct effects on the district and the contributing resources, including areaways and contributing structures. This is the reason we are requesting Sound Transit include the districts in their entirety and that the project include all potential haul routes as part of the Area of Potential Effect.

Second, in looking for our Pioneer Square historic properties of interest in the HPI forms, we were confused and frustrated by the organization and classification of the forms. Properties are listed by "segment"—which were not easy or intuitive to sort through. This made it difficult to review the volumes of information provided to search for the properties and areas we were looking for.

From our review, it's clear that because you've opted not to include the full district in the APE, nor have you chosen to include the properties we've listed in our initial letter to you, we reiterate our request that you consider adding the following properties to the Area of Potential effect:

Maynard Building (119 1st Ave. S.)
Union Trust Building (119 S. Main St.)
Occidental Mall (308-316 Occidental Ave. S.)
First & King Building (101 S. King St.)
Provident Building (568 1st Ave. S.)

Through our recent first hand experience with the Alaska Way Viaduct program, and the SR 520 program, we understand that increased truck traffic related to construction, and traffic diversion around and through the neighborhoods from construction activities, results in a direct significant increase of noise, dust, and vibration to historic resources. Our properties will be subject to these potential effects, and we request Sound Transit explicitly evaluate them as part of the Section 106 review.

Thank you for your time and persistence in this process. We look forward to continuing to work with you to deliver this important project, while prioritizing our neighborhoods' historic character and designations.

Respectfully,

Ryan Smith President

Martin Smith Inc



November 9, 2021

Mr. Mark Assam Federal Transit Administration 915 Second Ave Suite 3142 Seattle, WA 98174-1002

In future correspondence please refer to: Project Tracking Code: 2019-02-01457

Property: King County\_ West Seattle to Ballard Light Rail Extension

Re: Built Environment Determinations of Eligibility

Dear Mr. Assam:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced project has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your communication.

We do not concur with several of your determinations of eligibility. It is our opinion that the following historic properties are eligible for listing in the National Register of Historic Places (NRHP):

•	Property ID: 38453	Auditorium Apartments 605 5th Ave N
	Property ID: 41181	Sunset Electric Co. Warehouse 200 Terry Ave N
•		
•	Property ID: 42711	Electrol Oil Burner Corp. 601 Aurora Ave N
•	Property ID: 43319	Myers Motor Co. Dealership 4417 Fauntleroy Way SW
•	Property ID: 45169	Roosevelt Hotel 1531 7th Ave
•	Property ID: 56067	Uwajimaya Store 519 6th Ave S
•	Property ID: 337660	Symons Clamp & Manufacturing Company 2437 6th Ave S
•	Property ID: 342681	Henry Disston and Sons 1555 4th Ave S
•	Property ID: 343204	Wilderman Refrigeration Company 300 Dexter Ave N
•	Property ID: 387772	Ranch Duplex 3039 SW Avalon Way
•	Property ID: 666424	Industrial Building/Private Garage 706 Taylor Ave N
•	Property ID: 719333	Brown Bear Car Wash 1505 NW 52nd St
•	Property ID: 719370	Firestone Master Care Service 1145 NW Market St
•	Property ID: 719585	Goodyear Tire Center - Ballard 5601 15th Ave NW
•	Property ID: 720081	Larry Apple Realty 3050 15th Ave W
•	Property ID: 720175	Zeeb Iron Works 3434 16th Ave W
•	Property ID: 720527	Popich Sign Company 831 Airport Way S
•	Property ID: 720687	Kuney Johnson Company General Contractors Office 235 9th Ave N
•	Property ID: 721587	Single-Family Residence 4156 40th Ave SW
•	Property ID: 722031	Commercial Building 3440 6th Ave S
•	Property ID: 723714	Industrial Building 1121 NW 45th St
•	Property ID: 724023	Washington Fish & Oyster Co. Manufacturing Facility 1100 W Ewing
	St	•



It is also our opinion that the following historic resources are not eligible for listing in the NRHP:

Property ID: 338499 Dor Rik Apartments 2655 14th Ave W

Property ID: 418305 Contemporary Ranch House 4150 32nd Ave SW

Property ID: 720233 Residence 2246 1/2 15th Ave W

Property ID: 723016 Madera on Queen Anne Condominiums 3608 14th Ave W

We concur with the remaining determinations of eligibility you have made, and marked the spreadsheet provided noting our concurrence or non-concurrence.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Also, we appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4). Should additional information become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,

Holly Borth

Preservation Design Reviewer

(360) 890-0174

Holly.Borth@dahp.wa.gov



# Attachment H: Historic and Archaeological Resources/Section 106

The DEIS does not sufficiently assess the construction and permanent visual, physical, and operational impacts of the WSBLE project on historic resources. A thorough understanding and analysis of these impacts (effects) is necessary to meaningfully compare alternatives, inform a decision on a Preferred Alternative, and avoid costly conflicts and limited mitigation opportunities. Successful Section 106 consultation depends on the City having this information to evaluate impacts and trade-offs.

As noted in *Attachment C: Compliance*, the DEIS demonstrates several instances where compliance with Seattle Municipal Code sections related to implementation of the City's Historic Preservation regulations are not identified. Specifically, the references to when a Certificate of Approval (SMC 25.12 and SMC 23.66) is required for alterations within historic districts (demolition, construction of stations, venting structures, head houses etc.) or to individual landmarks.

The DEIS does not adequately address regulations regarding referral to the Landmarks Preservation Board of nominations for potentially eligible resources that are proposed for demolition or substantial alteration (SMC 25.05.675H2c and SMC 25.12). Without this information, the potential conflict with local controls and policies cannot be determined. These issues should be resolved and documented in the FEIS to avoid potential cost and delay in the project permitting process.

Related to both local and federal regulatory compliance, the DEIS does not adequately assess or describe the impacts to historic resources. Several specific examples that are of concern are the visual impacts to Union Station caused by vent stacks, the construction impacts to areaways regarding haul and detour routes, and the construction and operational impacts to Seattle Center under DT-1 Seattle Center station alternative at Republican Street. Additionally, the DEIS does not define, identify, or address impacts to traditional cultural properties (TCPs).

The City is a Consulting Party under Section 106 of the National Historic Preservation Act (NHPA). In this role, we will work towards concurrence on the area of potential effect (APE), identify historic and archaeologic resources within the City that are adversely affected and work with Sound Transit and FTA to develop a Memorandums of Understanding if appropriate. The City has not yet concurred on the project APE. We understand that the APE can change throughout the process as the project evolves. However, it is important that the APE capture all areas that will be impacted both permanently and during construction. We have specific concerns regarding the APE in the CID, Pioneer Square, and Seattle Center.

**Next steps**. A comprehensive inventory of these issues may be found in the City's formal DEIS comments in *Attachment A: City Consolidated Comments*. In addition to written response to those comments, the City seeks the following:

 Continued meetings of consulting parties with Sound Transit and the FTA to discuss and seek agreement on Section 106 matters.

- Clarity in the FEIS for analysis of proposed physical alterations and the resulting impacts (effects)
  on historic resources. This includes existing city landmarks and historic district, potentially
  locally eligible resources, and properties that are National Register listed or determined eligible.
  The FEIS must identify actions that will require a Certificate of Approval.
- Identification of actions that will require a landmark nomination must be submitted to the Landmarks Preservation Board per SMC 25.12 and SMC 25.05.675H2C.
- Identification of TCPs and analysis of impacts to those resources should be included in the FEIS.
- Analysis of impacts to areaways, particularly within Pioneer Square. Areaways have been
  evaluated during previous public projects, but those are not referenced in the DEIS.
- FEIS must clearly provide analysis of impacts (effects) to historic resources along haul and detour routes.
- FEIS must clearly provide analysis of visual, construction and operational impacts (effects) to Seattle Center. Specifically, construction feasibility studies for the Northwest Rooms and Cornish Playhouse to address some of the proposed alterations or nearby construction will be needed. See *Attachment K* for additional information on Seattle Center.
- Specific mitigation options relating to specific impacts to historic resources. It appears that the menu of mitigation options suggested in the DEIS is general rather than specific.



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

Re: Comments of Alliance for Pioneer Square on the Draft WSBLE EIS

Dear Ms. Swift:

Thank you for considering these comments of the Alliance for Pioneer Square on the Draft EIS for the West Seattle/Ballard Line Extension ("WSBLE") of Sound Transit's light rail system. This letter focuses on the impacts and mitigation for the Chinatown-International District ("CID") segment, station, and track alignment because that is the part of the larger WSBLE project that directly affects Pioneer Square. All alternatives for the CID segment will be within the boundaries of the Pioneer Square Historic District or directly abutting it. Construction of all alternatives will have significant adverse impacts on Pioneer Square. The choice of the preferred alternative may positively or negatively impact Pioneer Square for the next hundred years.

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a variety of uses including, mixed-use, residential, commercial, office and parks. This area has many restaurants... The district has historic cultural attractions.... a high percentage of the population... is low income. Many social resources in this segment include senior and low-income housing... as well as numerous social service organizations. (Paraphrasing DEIS discussion of the Chinatown-International District at 4.3.4-8.) The success of Pioneer Square depends on the interaction of street level uses with employees coming to offices from throughout the region, tourists arriving from across the world at the transportation hub formed at King Street and Union Stations, and the increasing numbers of housing units within the District. By ignoring Pioneer Square as a unique neighborhood with its own neighborhood cohesion and social resources, the DEIS ignores significant adverse impacts of the construction process, as well as the potential benefits to Pioneer Square from the selection of one versus another of the alternatives.

<sup>&</sup>lt;sup>1</sup> Alliance for Pioneer Square advocates for a community process to name the future station within this segment that includes all stakeholders and integrates both neighborhoods. The boundaries of Pioneer Square encompass all of Union Station, so the Fourth Avenue station alternatives are within Pioneer Square and the Fifth Avenue alternatives immediately abut it. Passengers heading to Pioneer Square will disembark at what the EIS calls the CID station. With Pioneer Square's employment base, including the Weyerhaeuser headquarters, numerous high tech businesses, and its active street level retail, the ridershed for the station is at least as great to Pioneer Square as to the Chinatown-International District. How the segment is named translates into how the EIS analyzes the area. Throughout the DEIS, the focus is on the Chinatown-International District and Pioneer Square is ignored, but never more so than in the Social Resources, Community Facilities, and Neighborhoods discussion, p. 4.3.4-8. There the DEIS discusses the Chinatown-International District as a hub of Asian-American community, finding that it has high neighborhood cohesion. That is undoubtedly true. But the DEIS ignores that the Pioneer Square neighborhood, which also contains

# Who We Are

Alliance for Pioneer Square is a community and economic development organization that exists to foster and preserve the qualities and characteristics that make the Pioneer Square neighborhood historic, and that have made it one of the most unique, inviting, and exciting neighborhoods in Seattle. Alliance for Pioneer Square has helped keep the Pioneer Square neighborhood vibrant by promoting a mix of office and residential uses along with shopping, dining, and cultural attractions, with pedestrian-oriented streetscapes, human-scaled buildings, and friendly public spaces. Alliance for Pioneer Square has been the voice of the Pioneer Square neighborhood in many City and regional planning processes, including the Jackson Hub Planning process over the past several years. This planning effort was intended to address the ongoing issues associated with imminent large-scale transportation and construction projects, including Sound Transit's WSBLE, impacting the intersection of S. Jackson Street between Third and Fifth Avenues, where the Pioneer Square and Chinatown-International Districts meet. It has sought to actively partner with Sound Transit in setting goals for Jackson Hub and the ways that the WSBLE project can enhance the public realm of the area, and also avoid creating major setbacks in the neighborhood's efforts to continue its upward trajectory. It has been a forceful advocate for preservation and enhancement of the public realm within and surrounding Pioneer Square.

Over the last 30 years, the Pioneer Square neighborhood has succeeded in attracting hundreds of millions of dollars in new investments, hundreds of new residential units, and has become not just the home of the new headquarters of Saltchuck and the Weyerhaeuser Company, both regional icons, but also of many technology startups – all while continuing to host the highest concentration of social service providers in the region and a wide mix of socioeconomic groups. The entirety of Pioneer Square is within the "walkshed" of all the proposed locations for the new station, and employees at Saltchuck, Weyerhaeuser, and many high-tech companies throughout Pioneer Square will use this new regional transportation hub.

Pioneer Square is not simply an area that happens to have several historic buildings, it is a historic district, listed as such on the National Register of Historic Places. The District itself functions as an entity which must be protected, and the health of the District as a whole is critical to the survival of individual buildings. Historic buildings require regular and expensive maintenance or they will, in due course, become derelict and disappear. To be able to conduct that maintenance, buildings must be financially successful. If access is cut off to the District, buildings that are not physically touched by the project may be put at risk because without the customers and suppliers that keep the occupants of the buildings healthy, the buildings will lose the resources to keep it viable.

Pioneer Square's remarkable balance of old and new, small businesses and large employers, and all types of people, is a fragile thing, however. Pioneer Square has been forced to survive multiple decades of major public projects disrupting access to and life within the neighborhood including early projects such as the implosion of the Kingdome and construction of Lumen Field to more recent megaprojects like the Alaskan Way Viaduct Replacement Project, the Elliott Bay Seawall Replacement Project, the First Avenue water main replacement project, and the Center City Connector project. The Covid-19 pandemic, combined with the current crisis of homelessness in Seattle, has been brutal to much of downtown Seattle, including Pioneer Square. While Alliance for Pioneer Square is confident that Pioneer Square will spring back, at

this time it needs all the help that public bodies can give it. In the case of Sound Transit, that includes particular care that it minimize and mitigate the impacts of the construction of WSBLE on the neighborhood, while also selecting the alternative which will provide the greatest long-term benefit to the transportation hub at King Street and Union Stations and to the public realm where Pioneer Square and the Chinatown-International District meet.

# How We Approach the WSBLE Project

Alliance for Pioneer Square expects and intends to continue to partner constructively with Sound Transit throughout the WSBLE project. We understand the importance of the WSBLE Project for the region as a whole, and for the City of Seattle. While it is a critical piece of our regional transportation infrastructure, if done well, it can have very positive long-term effect on Pioneer Square. If done badly, those impacts could have very negative long-term consequences. Regardless of the alternative chosen, the construction process will have very high negative impacts on all downtown Seattle, including Pioneer Square. The City's experience with the construction of the Third Avenue bus tunnel in the late 1980s showed that mega-transportation construction projects can inflict long-term damage on the neighborhoods where they are built. On the other hand, our experience with more than a decade of major infrastructure projects on our doorstep or through our neighborhood has demonstrated that with thoughtful and adequate mitigation, the construction disruptions can be survived with the neighborhood largely intact. That experience tells us that cooperation between Alliance for Pioneer Square and Sound Transit is essential if we are to avoid the greatest adverse consequences and achieve the greatest public benefits from this major public investment. Cooperation is, obviously, a two-way street. Alliance for Pioneer Square will expect that Sound Transit treat us as a partner in return.

# **Identifying a Preferred Alternative for the CID Segment**

Selection of the preferred alternative for the CID segment depends on which benefits and adverse impacts one weighs most heavily. All alternatives will have significant adverse construction impacts, for which adequate mitigation is essential to prevent long-term damage to the area. The two proposed alignments (4<sup>th</sup> Avenue and 5<sup>th</sup> Avenue) would have different outcomes for transportation mode connectivity. The cost of the alternatives differs. No single alternative rises to the top as the obvious best overall choice without further design and study. Therefore we offer you our priorities, what we prefer about the proposed alignments, and what our concerns are about the project, for the Sound Transit Board to consider while selecting a preferred alternative.

Alliance for Pioneer Square has long sought to improve connectivity, transit, and transportation access to the Pioneer Square neighborhood, as well as improve public realm connections between Pioneer Square, the Waterfront, the Stadium District, and Chinatown-International District. Alliance for Pioneer Square, Historic South Downtown, and Seattle Chinatown International District PDA collaborated to define a vision for intentionally developing King Street and Union Street Stations as a cohesive transportation hub (see the Jackson Hub Concept report). Our work together sought to improve the public realm around these stations, which today serves as the largest west coast transportation hub north of San Francisco. Our shared goals include improving connections between the neighborhoods, and improving transit access to and through Pioneer Square and the CID. When we consider the alternatives for the CID segment with this priority in mind, we believe the Fourth Avenue Shallow Alternative (CID-1a) achieves these priorities. This is primarily because it offers the

most direct physical connections between light rail, Sounder, and Amtrak modes, it creates new direct light rail connections to the Pioneer Square and Chinatown-International District neighborhoods and to the Stadium District, it places light rail closer to the ferry system and the waterfront, and it centers the transportation system inside the existing Jackson Hub footprint. Sounder riders coming from Pierce, South King, and Snohomish Counties would have more direct access to light rail at the new Weller Street entrance, allowing for greater transfer ease from regional commuter rail to local light rail. Transfer ease, better connectivity than today, and more intentional transit hub development are benefits that would be shared by all regional transit users. The Fourth Avenue Shallow alternative appears to offer the prospect for the greatest long-term benefit to the City and Pioneer Square, and the greatest return on the region's enormous investment in the WSBLE project.

The Fifth Avenue Shallow alternatives (CID-2a and 2a diagonal) would add one new light rail connection inside the CID neighborhood, at a similar location as the existing light rail station today. The new station entrance would be outside the existing transportation hub, and would create a more sprawling effect between modes. While a Fifth Avenue alignment would essentially result in "no change" to Pioneer Square's existing light rail access, it would represent a lost opportunity for the region to center regional transportation improvements closer to job centers and regional attractions. Fifth Avenue Shallow alternatives may provide a more direct opportunity for transit-oriented development and for public realm improvements inside the CID, but as of writing this letter, it remains unclear in the public discourse if those opportunities are considered a benefit relative to the cost incurred by the CID neighborhood resulting from the myriad significant construction impacts and the destruction of historic buildings and displacement of businesses.

WSBLE is a hundred-year investment in mobility of the region. In its advocacy, one of Alliance for Pioneer Square's consistent themes is that public investment should enhance the public realm. The Fourth Avenue Shallow alternative would create a station mezzanine level beneath 4<sup>th</sup> Avenue, allowing transfers between modes to occur beneath the street, and separating pedestrians from traffic. Grade-separated crossings create improved safety by giving pedestrians an option to crossing an active street. Separating vehicles and high volumes of transit users can improve traffic safety and improve the flow of people to and from the transit system, especially during surge events from the nearby stadiums and event centers.<sup>2</sup>

Another consistent advocacy theme from Alliance for Pioneer Square, and from some CID neighborhood stakeholders, is that Union Station should be activated for transportation purposes and economic development opportunities, the plaza in front of Union Station should be enhanced, and the intermodal connection of the King Street Station should be tied more closely to Union Station. That is possible if a Fourth Avenue alternative is chosen. Either of the Fifth Avenue alternatives will simply increase the extent to which King Street Station and Union

<sup>&</sup>lt;sup>2</sup> This same principle of separating people from vehicles and other modes, while creating important connections to transit is most recently illustrated at the Montlake Triangle Project. Sound Transit, Washington State Department of Transportation, and the University of Washington collaborated to deliver the Montlake Triangle Project as a solution to alleviate concerns about the volume of transit patrons crossing the Burke-Gilman trail, and provide improvements at existing crosswalks at Montlake Boulevard as part of the Montlake area improvements being made in the SR 520 Bridge Replacement and HOV project. A key distinction between the Montlake Triangle Project and the Fourth Avenue Shallow alignment is that the public realm benefits are built in to the WSBLE project, and do not require a separate project effort like the Montlake Triangle Project.

Station are divorced from each other, will fail to improve existing intermodal connectivity, will provide no direct basis to enhance the plaza in front of Union Station, and will not increase the extent to which the use of Union Station returns to transportation.

One of the disadvantages of the Fourth Avenue alternatives, viewed alone, is that they require rebuilding of the Fourth Avenue South Viaduct and other surrounding bridges. At the moment, it is tempting to put off that expense, and to defer solving the transportation challenges that come along with bridge replacement. The reality is, however, that several bridge structures abutting the Fourth Avenue South Viaduct, including the 2<sup>nd</sup> Avenue Extension and Jackson Street bridges, are currently undergoing study for replacement by the City of Seattle as part of the current Move Seattle levy Bridge Rehabilitation and Replacement subprogram. Bridges surrounding Fourth Avenue are in need of repair and replacement, and the construction impacts widely feared around a Fourth Avenue alternative, will come to pass sooner than later. The worst-case construction scenario for Pioneer Square is to have survived the last ten years of infrastructure mega-projects, survive WSBLE, and then shortly thereafter, have to face the reconstruction of 2<sup>nd</sup> Avenue Extension and Jackson Street—impacts many have touted as a negative scenario as part of the Fourth Avenue Shallow station alignment alternative. It is far better to get that infrastructure upgrade dealt with at the same time as WSBLE, so that when WSBLE is completed, the sole focus can be on moving forward.

Sound Transit disclosed in the Draft EIS that the Fourth Avenue Shallow alternative would not permanently close King County Metro Ryerson Base but would impact the bus entrance to the base during construction of the tunnel portal and reconstruction of the Stadium Station. Sound Transit also disclosed that staged construction could likely occur in a manner that would prevent closing Fourth Avenue South completely during a majority of construction, but that full closures would occur at several intersections, and along streets north of the proposed station. Sound Transit further disclosed the length of time to construct the Fourth Avenue Shallow station alternative could be years longer than the other alternatives considered in the CID segment but would not know that with certainty until final design. Without better information about the ability for Sound Transit to minimize the issues described, it is difficult to understand if the challenges presented can be reasonably solved and mitigated. Alliance for Pioneer Square requests Sound Transit advance the Fourth Avenue Shallow station alternative for more design and study, meaningfully seek to reduce the estimated time for construction, further study the extent and need for roadway and bridge rebuild along Fourth Avenue, and evaluate minimizing the impacts to traffic, King County Metro bus bases, and parking resources identified as important to meeting the Stadium District Master Use Permit conditions.

Fifth Avenue alternatives appear to have fewer traffic and transportation impacts during construction, however, construction of those alternatives would still affect important parking resources necessary to meet the Stadium District Master Use Permit, and would present challenges for King County Metro Central Base. Should Sound Transit choose to further evaluate Fifth Avenue alternatives, additional study and engineering would need to be done to minimize access impacts to parking resources required by the Stadium District, and operational impacts to King County Metro bases within the construction area.

On balance, we believe the Fourth Avenue Shallow alternative will provide the most connectivity and receive the most use by people coming to and from Pioneer Square, as well as the Chinatown-International District, and from people arriving in Seattle at King Street Station

via Sounder or Amtrak.<sup>3</sup> Having made the enormous investment in the WSBLE project, it is important that the alternative chosen is one that will receive the most use.

The Fourth Avenue alternatives also offer far more opportunity to reactivate Union Station for transportation use – its original purpose, far more opportunity to strengthen the multimodal hub created by the Sounder and Amtrak lines at King Street Station, the Seattle Streetcar, the Washington State Ferry terminal, and the numerous bus routes that use Second, Third, and Fourth Avenues, and to enhance the pedestrian environment at the Union Station Plaza, which is the hub joining Pioneer Square and Chinatown-International District. If the Fifth Avenue alternatives are chosen, the currently awkward and confusing links between Sounder and Amtrak in King Street Station and the light rail station on Union Station will only become more confusing. The ferry terminal will be further away and less convenient. There will be no reason to reimagine the Union Station plaza to make it more welcoming and useful—an outstanding promise made to the CID community when the existing light rail station was installed. Those will be missed opportunities to enhance the public realm.<sup>4</sup>

# Why We Believe Other Alternatives Can Now Be Rejected

After evaluating the information presented in the Draft EIS, and considering our priorities for increasing transit access to Pioneer Square and increasing connectivity between neighborhoods, we are ready to urge Sound Transit to reject the two deep station alternatives (CID-1b and CID-2b). With deep station access depending on elevators, we do not believe they will be used as much as they should be and may even result in diversion from the station. While Sound Transit's Beacon Hill station relies entirely on elevators for access, it does not experience the sort of surge use that we would expect at the CID station. (It is also difficult to measure whether use of light rail to and from the Beacon Hill station is deterred by the fact that it is served only by elevators). Surge events would be particularly common when there are events at the stadiums and event centers or in Chinatown-International District. One of the many important functions of light rail is to move people to and from major events without their automobiles, so it is critical that individuals not be dissuaded from taking light rail by the fear they will be stuck on the platform in a crowd, waiting to get onto an elevator. Some number of people will be claustrophobic and will avoid a station that depends on an elevator. Sound Transit also has recently experienced equipment failures of its escalators and elevators at some stations. An equipment failure at a station that depends on elevators could leave many riders unwilling to use the station thereafter. We assume the deep alternatives would have emergency stair access for people to exit the station, however, many people would find needing to climb 180 to 190 vertical feet of stairs extraordinarily difficult and in some cases dangerous. So, while it is tempting to

<sup>&</sup>lt;sup>3</sup> Table 3-20 predicts that the Fifth Avenue alternatives will experience more PM peak hour transit transfers than the Fourth Avenue alternatives. We have found no explanation for that assumption, and do not expect it to be true. But regardless of transit transfers, we believe the Fourth Avenue alternatives will be more attractive to transit riders coming to jobs within Pioneer Square, and that transfer from Amtrak and Sounder trains in King Street Station to the Fourth Avenue station will be more convenient than to a station on Fifth Avenue.

<sup>&</sup>lt;sup>4</sup> Instead, the project will remove several contributing historic structures the Chinatown-International District, which is a loss that cannot be mitigated. The DEIS's characterization of that demolition of historic structures as an "opportunity for transit-oriented development" seems like an effort to make a silk purse from a sow's ear. Razing historic buildings will indeed place the burden on Sound Transit to make sure that the land is put back to the best possible use. But it does not mitigate an irremediable impact.

prefer the shorter construction disruption and the lower cost of the deep alternatives, we believe the end result would not justify the construction and cost benefits.<sup>5</sup>

We also express real concern for the construction effects and potential gentrification risk posed by the Fifth Avenue shallow alternative. We will leave it to the Chinatown-International District residents and stakeholders to explain their concerns about the demolition of historic structures, the loss of small business, the loss of on-street parking, the massive increase in heavy construction traffic through the neighborhood, and the impact on Hing Hay Park. But quite apart from the adverse impacts on the Chinatown-International District, the Fifth Avenue alternatives will do nothing to enhance the connection between Union and King Street Stations, it will do nothing to enhance the public open space in front of Union Station, and it will do nothing to enhance the multi-modal transportation network that comes together in Pioneer Square. In general, it will be a missed opportunity to develop regional transportation resources within an existing transportation hub, and it will damage the Chinatown-International District with little or no redeeming feature other than seemingly minimizing impacts to transportation during construction. If Sound Transit intends to advance Fifth Avenue Shallow alternatives to the Final EIS, it must perform additional design and study to address design questions and concerns raised by the community, to further minimize impacts, and provide the information necessary to define any mitigation needed, if mitigation for such impacts are determined possible.

# Additional Analysis that Needs to Be Addressed in the Next NEPA document

39 CFR §775.11(c)(5)(iv) requires an EIS to "describe appropriate mitigation measures not considered to be an integral part of the proposed action or alternatives. The EIS is to be used, with other analyses and materials, to decide which alternative should be pursued or whether a proposed action should be abandoned or other courses of action pursued. 39 CFR § 778.9(4). Mitigation measures identified in an environmental impact statement and accepted in a decision must be implemented. 39 CFR § 778.9(7),

There is very little, if any, analysis of what measures can be taken to minimize and mitigate the adverse transportation impacts of the construction process. Because under any alternative, the construction impacts will be of such a duration that they will do severe, long-term damage to both Pioneer Square and the Chinatown-International District if not minimized and mitigated, additional analysis of what mitigation is possible is required before the Sound Transit Board can make a final decision on the alternative for the CID segment. As discussed above, we believe the deep station alternatives can now be abandoned, but Sound Transit needs to use the next few months to focus on potential minimization and mitigation of the impacts of the shallow alternatives, so that a more informed decision, with further community input, can be made before the final preferred alternative is selected.

<sup>&</sup>lt;sup>5</sup> Although our objection to the deep alternatives is primarily based on their likely lack of use at critical times due to their dependence on elevators, we would also note that the fact that alternative CID-1b would eliminate the Ryerson Bus Base is a significant adverse impact that cannot easily be mitigated. Metro has to have a bus base. It requires a large area, and it needs to be close to the destination of many of Metro's buses. There is not another six-to-sevenacre site that is likely to be available without significant displacement of other businesses. The cost and impacts of relocating the Ryerson Bus Base needs to be viewed as part of the cost and impacts of alternative CID-1b.

# Mitigation That Will Be Needed Regardless of the Alternative Chosen

Identifying the mitigation that will be implemented to reduce the adverse impacts of a proposal is one of the most important components of an EIS under the National Environmental Policy Act ("NEPA"). The WSBLE DEIS is arguably deficient in its failure to identify mitigation that will be implemented. Instead, it repeatedly says in effect that mitigation will be worked out as the project progresses. While we appreciate the difficulty in getting to the fine details of mitigation at the stage of a project where its basic outlines are not yet fixed, it is not acceptable to leave the issue of mitigation to "just trust us." The State Environmental Policy Act ("SEPA") rules make provision for phased review, WAC 197-11-060(5), which allows the agency to focus on issues ripe for decision and exclude from consideration issues not yet ready. Phased review would be appropriate here, so that the details of mitigation could be reviewed when the project is more developed. The NEPA rules do not have a similar provision for phased review. However, if Sound Transit relies on NEPA rules for the adequacy of its EIS, it must continue to involve stakeholders, including Alliance for Pioneer Square, in the development of mitigation. Alliance for Pioneer Square is willing to work with Sound Transit to permit the process of identifying mitigation to not impede the project schedule, but it is not willing to have the scope of mitigation reduced because it was left out of the EIS.

The single largest adverse impacts from the WSBLE project are likely to be construction impacts. While it is sometimes thought that the adverse environmental impacts of constructing transportation projects are simply to be tolerated, history has shown that major urban transportation infrastructure projects can fundamentally and profoundly damage the neighborhoods through which they pass. The impacts of the construction of the Third Avenue bus tunnel in Seattle is a classic example of that truth. Before the bus tunnel construction, Third Avenue was a busy, active street lined with small shops and frequented by pedestrians. The construction put the street level businesses out of business; when the bus tunnel opened, the street itself was largely deserted and sterile. Street level crime moved in, and that further dissuaded new business. Today, thirty years after the bus tunnel opened and despite years of effort at correcting the situation, Third Avenue remains blighted.

On the other hand, with adequate mitigation, a neighborhood can emerge from a transportation mega-project relatively intact. The survival of Pioneer Square and the Waterfront from the seawall construction, the First Avenue water line replacement, the Viaduct replacement and the streetcar construction is evidence of that fact.

In planning mitigation, Alliance for Pioneer Square believes that Sound Transit must learn from the experience of the last fourteen years of regional mega-projects. We believe the following are some of the critical things we have learned about construction mitigation over the last decade:

1) Protection of street level small businesses is the most critical requirement for allowing a neighborhood to emerge intact from a transportation mega-project. If street level small businesses have survived, people will return when the project is over. If they have not survived, street crime will become a problem, businesses will be hesitant to return, and residents will flee. Some transportation projects have seemed to assume that because small businesses are inherently fragile, their loss is simply part of what must be accepted in the name of progress. But Third Avenue is proof that when that approach is taken, it may be decades before the neighborhood can recover.

- 2) Pioneer Square's experience with the last fourteen years suggests that the following mitigation is needed to have a reasonable likelihood of the neighborhood remaining intact:
  - a. Pedestrian access must be maintained to not only the businesses abutting the construction site, but also to Pioneer Square from the current International District/Chinatown light rail station while it is open, Amtrak, and the Sounder. That access must be safe, functional, and attractive. It is not enough that it is technically possible to reach Pioneer Square; access needs to be well-marked, comfortable to traverse, well-lit, enhanced as if it were a permanent pedestrian thoroughfare, and it has to be accessible to people with different abilities. People will not utilize temporary access routes if they are hard to navigate, feel unsafe, or do not meet the needs of all abilities. Temporary and unattractive pedestrian routes will kill small business in Pioneer Square as surely as if there were no access at all. There needs to be significant resources to make way-finding easy and to create amenity value although people are crossing a construction zone.
  - b. There may be times when even if access could technically be maintained to businesses abutting the construction site, it will be cheaper for the project and more successful in the long run to pay businesses to close temporarily. That happened on the Waterfront for several months during the seawall replacement. The cost and delay to the project of maintaining access to the businesses made it better for everyone to pay for a closure. The payments must allow the businesses to pay fixed costs and be able to keep core staff paid, so that the businesses can reopen at the end of the closure period.
  - c. Communication of changes on a current basis, and on a property-specific basis, is critical, so that businesses know as much as possible on as timely a basis as possible. The communication needs to be two-way the contractor needs to know when things are going on that are unnecessarily harmful, just as businesses need to know what will be happening with construction. Alliance for Pioneer Square has served a critical role in being that communication conduit for the last decade and will be happy to continue in that role for Pioneer Square. It will need resources to continue that function.
  - d. The neighborhoods will also need resources to communicate to the public that they are open, how to get to them, and why people should want to come. Without extra promotion, people will stay away and that will starve small businesses.
  - e. The construction may need to modify its schedule to protect key events, such as the First Thursday Art Walk and fleet week for Pioneer Square.
  - f. Delay from the announced schedule can be deadly. That happened when the First Avenue water main was delayed for several months. Small businesses will be figuratively "holding their breath" throughout the process, and if they are told they can expect the project to be completed by a date, they will plan accordingly. If that date then slips several months, they may lose the investments they made in being able to return to

"normal" earlier. Although the communication discussed under item c above can mitigate some construction impacts, unexpected delay is not an impact that can be mitigated by communication alone.

g. The City and County must put a moratorium on other public projects in the rights-of-way in and adjacent to the Pioneer Square neighborhood for the duration of significant WSBLE construction. This will ensure that while the WSBLE construction disrupts a large portion of the neighborhood and access to Pioneer Square from the east, access is maintained from other directions so that Pioneer Square is not effectively cut off from Downtown or SODO.

Construction mitigation is not the only mitigation that must be considered, however. Urban design of the finished streetscape and of elements of the project must be sensitive to the character of the neighborhood. Major transportation infrastructure can end with a long swath of new concrete that has the look and feel of a gash across the city. It can be sterile and harsh. And if that is the outcome, it may take decades to repair. On the other hand, if the end result is sensitive to the neighborhood, it can quickly settle into the neighborhood as if it has always been there. Sound Transit has generally done a very good job of this in its existing stations, but it must redouble those efforts to design its facilities and the restoration of the areas it has disturbed, so that they seem to belong in the Pioneer Square Historic District, and do not become a continuing intrusion into the neighborhood.

The classic example of where sensitive design will be critical is the exhaust structures that will be needed. If the Fourth Avenue Shallow alternative (CID-1a) is chosen, we understand that an exhaust structure is needed, and is currently proposed on Union Station Plaza. Its size is likely not changeable, however, we are unsure if its location may be changed. If it is designed to be attractive and fit into the neighborhood, or to be a visual amenity to the area, it can be quickly accepted as simply part of the streetscape. If it is garish and insensitive, it will be a permanent scar.

# **Section 106 Considerations**

Alliance for Pioneer Square is one of the principal advocates for preservation of the Pioneer Square Historic District. Pioneer Square as a home to thousands of residents, as the home of multiple job-creating companies, and as a major tourist attraction for the region, depends not on the vitality of any one building, but on the vitality and cohesiveness of the District as a whole. As the Historic and Archaeological Resources Technical Report states, p. 2-1, "historic properties" are defined for Section 106 purposes to include not just an individual site, building, structure, or object, but also any historic district that is listed on the National Register. Here the relevant "property" is the Pioneer Square Historic District as a whole. The delineation of the "area of potential effects," Figure 3-2, is therefore too narrow. It should be expanded to include the entirety of the Pioneer Square Historic District.

That expansion is not simply a matter of definition, but is necessary to understand and address the actual adverse impacts of the WSBLE project. As discussed above, Pioneer Square achieves its success not because of any one individual building, but because of the fact that it is a

neighborhood of historic buildings, imbued with the earliest history of Seattle, dating to before European settlement, and continuing through the recovery from the Great Seattle Fire and the Alaska/Yukon gold rush and into the 20<sup>th</sup> Century. Each of the buildings survives in part because of the vitality of the district as a whole. Although WSBLE will be built on the eastern boundary of the District, if the construction cuts off the remainder of the District from the visitors essential to the survival of its street level businesses, the effect of the construction will be extremely negative on the district as a whole. Thus the analysis for purposes of Section 106 must look at the impacts on the District as a whole, not just at the impacts of specific properties directly abutting the construction site.

Construction will necessarily be disruptive to many people attempting to come to downtown Seattle, and that may be more so for Pioneer Square. Regardless of the alternative chosen for the CID segment, the construction duration will be longer than any small business can survive if its customers cannot reach it or choose not to attempt to reach it. The neighborhood will need to have resources to communicate to the broader public that the businesses are still open, and how to access the district if it is to survive without major long-term damage.

# Conclusion

**Signatures** 

WSBLE is an exciting and a challenging project, and a critical piece to the overall regional transit network. The opportunities before us to intentionally create a more connected, planned, and welcoming transportation hub for all transportation users is a once-in-a-lifetime opportunity that will eventually benefit everyone. The importance of the transportation hub at King Street and Union Street Stations to the region cannot be overstated. We look forward to partnering with Sound Transit to help the WSBLE project bring its benefits to the entire region, while at the same time protecting the historic neighborhoods through which it passes.

# Jan Drago Grant Wojahn, Co-Chair Many Jane Nelson Steve VanDerhoef Paul Swegle Andy Wattula

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Ryan Smith
Lisa Dangaard
Lisa Daugaard
Azar Koulibaly
Azar Koulibaly, Co-Chair
Leila Kirshe
Leila Kirske, Treasurer
Denise Merle
Denise Merle
Ada Ham
Adam Hasson, Secretary
Brett Phillips
Brett Phillips





# **VIA ELECTRONIC MAIL**

Seattle Chinatown International District Preservation and Development Authority WSBLE Draft Environmental Impact Statement Comments

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

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

Dear Ms. Swift:

The Seattle Chinatown International-District Preservation and Development Authority (SCIDpda) is a municipally-chartered public development authority created by the City of Seattle to steward the Chinatown-International District—its public spaces, its small businesses, and its residents. We are a quasi-governmental entity, and are focused on the neighborhood, not an ethnic heritage or political belief. Our board reflects the diversity and range of opinion of our stakeholders, which, like all neighborhoods and communities, cannot always agree on topics, approach, or methods.

Our neighborhood is defined between 4<sup>th</sup> Avenue to Rainier Ave, and Main Street and Dearborn Ave. We house over 400 residents and 40 neighborhood businesses, and have been doing community development work in the CID for over 47 years. It is from that perspective, expertise, and knowledge that we submit the following comments on the Draft Environmental Impact Statement ("DEIS") for the West Seattle and Ballard Link Extensions Project ("the Project"), notice of which was issued on January 28, 2022.

We appreciate the opportunity to submit feedback on the DEIS for the project.

# MORE ABOUT SCIDPDA and the CID

SCIDpda's mission is to preserve, promote, and develop the Seattle Chinatown International District (CID) as a vibrant community and unique ethnic neighborhood. Formed by the community in 1975, SCIDpda works to revitalize and preserve the neighborhood by providing services in three areas: affordable housing and commercial property management, real estate development, and community economic development and community engagement. We have over a 45-year success record of increasing neighborhood sustainability through innovative programs and projects that balance development and preservation.

As a neighborhood-based community developer, SCIDpda engages and mobilizes community members to develop collaborative solutions to meet neighborhood priorities—because a community's strength comes from its members taking the initiative to shape its present and future.

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The neighborhoods that comprise the CID are at an exceptionally vulnerable point in our 100+ year histories. The COVID-19 pandemic, epidemic of anti-Asian incidents, and 2020 protests against racial injustice and police violence disproportionately affected our neighborhood. Ongoing public safety concerns in Seattle and the surrounding region have historically challenged our neighborhood and continue to do

Throughout its history, the CID—a place in Seattle where people of color and, especially, the Asian Pacific Islander community were relegated to living—has experienced hugely disruptive public infrastructure projects that have imposed localized and persistent impacts to our community while providing regional benefits. These include:

- The construction of Interstate 5 (which bisected the neighborhood)
- Construction of the Kingdome
- The SR99 Deep Bore Tunnel
- First Hill and Center City Connector Streetcars
- Seawall, Seattle Waterfront and, demolition of the Alaskan Way Viaduct
- Utility upgrades

The CID has a long history of cycling through disruption caused by public infrastructure construction. Each time this happens, the CID works through disruptions and recovers, only for the cycle to begin again with the next infrastructure investment. As stewards of the neighborhood, SCIDpda has advocated directly to the City of Seattle, Sound Transit, and King County (along with partners) to review past outreach outcomes to understand what community members have identified in the past 20 years about our interests, needs, concerns, and priorities. The City, Sound Transit, and King County have agreed to incorporate many of these interests, needs, concerns, and priorities into future projects and plans that affect our neighborhoods—including this Project. These priorities include:

- Retain or increase community ownership of properties
- Acknowledge and address historic racism that has and continues to impact the CID
- Increasing connectivity to surrounding neighborhoods.
- Minimize cumulative harm to and displacement of existing businesses, residents, and P 206.624.8929 nonprofits
- Support a thriving, placed-based small business economy during the WSBLE construction and beyond
- Enhance the public realm (streets, alleys, public spaces, etc.) in and around the

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## station area

- Enhance public health and well-being

Seattle Chinatown International District Preservation and Development Authority

It is through the combined perspectives of our mission and values, our experience and history, and these listed priorities, that we offer the following comments and perspectives about the alternatives and impacts described in the WSBLE Draft EIS.

# A. Impacts of Fifth Avenue Alternatives are existential for the Chinatown-**International District**

The DEIS describes and compares the impacts of the Fourth and Fifth Avenue alternatives. After carefully considering the DEIS analyses, we conclude that the impacts of the Fifth Avenue Alternatives would put many of the community priorities outlined above at great risk. Unless Sound Transit can substantially minimize the construction effects or identify another option that moves the construction impacts away from the cultural spine of the Chinatown-International District, we do not believe the Fifth Avenue Alternative and options are acceptable. The mitigation discussed is inadequate to address the totality of the impacts.

Construction of the Fifth Avenue Alternatives would be the most disruptive in the very heart of the Chinatown-International District. Construction would close key streets for commercial and cultural activity, including King Street and Weller, for long periods, affecting access to retail businesses for customers and suppliers. Construction would create noise, dust, truck traffic, and visual impacts that would hamper or prevent community gatherings and activity in Hing Hay Park and other outdoor spaces, and affect quality of life for residents of buildings such as Uwajimaya Village, Fujisada Condominium, Publix Building, Bush Hotel, and the Alps Apartments—many of whom are seniors or living with disabilities. Construction of this alternative would permanently displace on-street parking, which is of particular importance to the retail and small business environment in the Chinatown-International District. Fundamentally different construction plans need to be developed to vastly reduce the impacts. With the current construction plans, no amount of mitigation can reduce the impacts to tolerable levels.

While the potential opportunity for transit-oriented development (TOD) associated with the massive disruptions created by the Fifth Avenue alternative and options may be enticing, after years of bisection and displacements from transportation facilities, exposure to degraded air quality through transportation planning and zoning policies, and now recovery from renewed racialized violence and vandalism, the amount of impact imposed on the CID is difficult if not impossible to put a mitigation price tag on. Sound Transit would have to find ways to further minimize the impacts described or identify other options that move construction away from the cultural spine of the Chinatown-International District. Further minimization is required before we could even begin to value the substantial mitigation required to construct in these alternatives. The community would need assurance that community ownership would Suite P2 be prioritized in any TOD opportunity associated with the project. Ensuring community ownership will be critical if the project is to reduce—not exacerbate— the

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CID community's risk of gentrification and displacement. These measures *must* be in the form of explicit legal commitments; the promise of a TOD opportunity alone is not sufficient mitigation or incentive to support a Fifth Avenue alignment.

# B. Impacts and benefits from Fourth Avenue alternatives are not equally addressed

The construction of either of the Fourth Avenue alternatives would result in major traffic pattern changes that would have a damaging impact on the CID community. DEIS Section 3.19.3.1 (Arterial and Local Street Operations) states that throughout the six-year closure of 4th Avenue South, a high volume of north-south traffic would be diverted through CID neighborhood streets—resulting in increased levels of traffic congestion. Understanding the disruptive impact of more than nine years of construction on local traffic is critical, but it is not the only important impact that the community needs to consider.

The DEIS assessment fails to account for the environmental health impacts that this increased traffic congestion would have on the neighborhood. These impacts include (but are not limited to): increased noise levels, increased exposure to automobile exhaust, and increased risk of pedestrian injuries and property damage caused by automobile crashes. The DEIS also fails to account for the disruptive impact that such an increase in pass-through traffic would have on the neighborhood's economic vitality, including making street parking more difficult and disrupting economically important community events that require street closures. A more thorough study of both the environmental and economic impacts of the extended closure of Fourth Avenue South is required for the community to accurately compare it with other alternatives.

The DEIS also falls short of identifying any meaningful mitigation strategies to address project impacts. Without understanding how Sound Transit intends to minimize and mitigate impacts, it is difficult to provide meaningful feedback about preferences. In addition to providing more information about the impacts we reference in this letter, Sound Transit must propose appropriate mitigation measures to address impacts associated with the Fourth Avenue alternatives so that the community can weigh the alternatives and their benefits, impacts and mitigation strategies, against our own community priorities.

The Fourth Avenue alternatives would have direct connections to both Pioneer Square and Chinatown-International District neighborhoods and would facilitate more direct connections between transit modes such as Sounder, Light Rail, Amtrak and private buses. The Jackson Hub concept plans, as well as the community priorities listed in the beginning of this letter, state both neighborhoods' advocacy for improving connections between the neighborhoods, improving the public realm, and activating the Jackson Hub area more intentionally. From our review of the information presented in the DEIS, there appear to be opportunities to realize long-held community goals and regional benefits from a Fourth Avenue alignment, but the analysis lacks the information decision makers and the public need to further understand these opportunities. For example, no formal visual quality analysis was performed for alternatives in the CID segment and there was no discussion of the

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Chinatown-International District and Pioneer Square as complete, cohesive, and interconnected neighborhoods. An actual visual quality analysis, complete with images and discussion, would allow decision makers and the public to see how station entrances and improvements along 4<sup>th</sup> Avenue South between S. Jackson Street and Seattle Boulevard would contribute to public realm goals. More visual representation of the scope and scale of proposed tunnel ventilation facilities for both Fourth Avenue and Fifth Avenue alternatives would aid in better understanding of impacts to the public realm. The proposals would have a significant disruptive impact if they are constructed according to the dimensions described in 'Appendix J Conceptual Design Drawings – Ballard Link Extension'.

A more meaningful analysis of visual impacts also should lead Sound Transit to discuss opportunities to enhance connections and cohesiveness between the two neighborhoods in the Social Resources, Community Facilities, and Neighborhood conclusions. Without a more formal analysis, beneficial impacts of the proposed project and alternatives are not explicitly disclosed and are hard for the reader to conclude.

# C. The Deep Options do not support a 100-year vision for our neighborhoods

We do not see the deep options as viable. Elevator-only access and long transfer times will not be able to keep up with crowds during major events in the area (e.g., football, soccer, or baseball games or Lunar New Year). Elevators are expensive to maintain and often break down, as has been our community's experience within the Sound Transit network. Elevators will also not be viable if there is another global pandemic that makes it practically unsafe to ride in an elevator with other members of the general public. We are also deeply concerned that requiring access via elevators may deter most people from disembarking or transferring at the CID station. Foot-traffic is essential to maintaining vibrancy and economic opportunity for the CID and its businesses.

We recommend removing the deep options as alternatives going forward.

# D. The adverse effects indicated in the DEIS do not reflect the true impact to our communities

While Sound Transit and the City of Seattle have publicly committed to equity in the project process and applying the Racial Equity Toolkit throughout, the Draft EIS has some glaring holes in the analysis that must be addressed.

Sound Transit performed neither an operational noise analysis nor a visual quality analysis for the Chinatown-International District neighborhood. While the methodology sections give plausible technical reasons for this approach, those rationales are inadequate. Considering the project context and the focus on race and social justice for this project, the omitted analyses are vital to inform other analysis within the EIS. Without a noise and visual quality analyses, the Environmental Justice analysts concluded "no impact" when in all reality, there was "no analysis." This lack of information served to underestimate the impacts for all the CID segment alternatives and paint a picture of impact minimization that simply is not true.

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The Environmental Justice analysis acknowledges cumulative harm caused by decades of public infrastructure projects sited and constructed without centering the voices of people of color—but then fails to account for that cumulative effect and harm in the actual analysis. The Environmental Justice conclusion of no disproportionately high and adverse impact (Appendix G, Table 5-4, pages 5-31 through 5-66) further minimizes the true effect on our community.

This is representative of the findings provided in many of the Draft EIS analyses—no analysis in a few key disciplines led to "no impact" conclusions, which we believe lends to the overall inadequacy of the Draft EIS. For specific comments about the analysis, and to see our concerns described in more detail, please refer to the accompanying attachment to this letter titled "Discipline and Issue-Specific Comments on the Draft EIS."

Finally, there is growing concern that losing buildings within the Seattle Chinatown Historic District boundary that are considered "contributing" to the historic character of the neighborhood, will erode the very historic and cultural fabric we have struggled to maintain. Losing a contributing historic building within the historic district protected under Section 106 of the National Historic Preservation Act appears to be a serious impact—one that is potentially unmitigable. Sound Transit did not propose any mitigation for the loss of historic structures in the district, and did not suggest any strategies for minimizing impacts to the historic district resulting from construction. Mitigation strategies need to be discussed with the community and consulting parties as soon as possible, and those conversations must not be delayed until publication of the next environmental document.

# E. Conclusion and Recommended Path Forward

We recognize the need to keep this project moving forward and to facilitate delivering the full ST3 program for the benefit of all regional users. We also recognize that the longer this environmental process takes, the more expensive things can get, and the longer it takes to find the additional resources needed to deliver on the promises made to voters. The environmental process will take as long as it has to in order to get the right results for these once-in-a-generation infrastructure opportunities. But it is in the spirit of continuing to advance the project while also advocating for our communities that we suggest the following path forward.

Based on our review of the information provided in the Draft EIS, the Fourth Avenue shallow alternative is the least impactful option for the CID. We recommend that Sound Transit follow the close of the DEIS comment period with advance design and study of the Fourth and Fifth Avenue shallow alternatives (CID-1a and 2a diagonal) with the goal of further minimizing the cost, the time, and area needed for construction and the impacts. Once complete, we recommend Sound Transit engage the community in discussion well before the Final EIS about the findings from this study effort. The attachment to this letter includes a list of issues and recommended directions for study, but we also encourage Sound Transit to take the initiative to find solutions in areas we have not yet commented on. We are not engineers, and we don't claim the skills required to address the full scope of engineering challenges this

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project faces—but we do know that this region has the technical talent available to tackle the challenges.

By focusing time and resources only on the shallow alternatives, Sound Transit can develop the information needed by the community to support future selection of a preferred alternative. We cannot overstate the importance of Sound Transit providing the additional information requested in this comment letter prior to formal publication of the FEIS. This information will be necessary for SCIDpda and the CID community to support a project that facilitates much needed high-capacity regional transit, transit connectivity, and serves to enhance our neighborhood. The information can help frame up subsequent mitigation conversations, a topic that many in government appear anxious to advance.

Thank you for the opportunity to provide comments on the Sound Transit WSBLE DEIS. We strongly urge Sound Transit to work closely with the City of Seattle and King County to more fully explore strategies for reducing the costs and impacts associated with the three shallow alternatives before coming back to the CID community for further discussion.

Sincerely,

Mindy Au

President, Board of Directors

Veronica Wood

Interim Executive Director

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# Attachment to SCIDPDA DEIS Comment Letter April 25, 2022

Discipline and Issue-Specific Comments on the Sound Transit West Seattle and Ballard Link Extensions Project Draft EIS

1. *Inconsistencies between Racial Equity Toolkit and DEIS:* The Racial Equity Toolkit commits to an outcome of limiting harmful impacts of the Project and working with impacted communities to identify opportunities to repair past harm. It acknowledges the cumulative harm caused by decades of public infrastructure projects sited and constructed without centering the voices of people of color. Yet while the Environmental Justice analysis references these impacts in the narrative, it does not include the documentation of the analysis that led to an Environmental Justice conclusion of no disproportionately high and adverse impact (Appendix G, Table 5-4, pages 5-31 through 5-66).

These cumulative impacts are a key concern for many residents and business owners in the Chinatown-International District, and they should be explicitly considered as part of the Environmental Justice analysis.

2. **Consideration of noise impacts is insufficient:** The Noise and Vibration Technical Report states the following: "Commercial and industrial districts are in the Chinatown-International District Segment... Although there are no nearby residential districts near the segment there are mixed use properties with residences in commercial districts, such as Uwajimaya and the Publix Hotel. Residential use properties within commercial districts are treated the same as commercial properties within the city of Seattle." (Appendix N.3, page 6-37)

While this may be acceptable by federal noise analysis standards, it is unacceptable from a racial equity standpoint. Sound Transit should conduct a complete operational noise analysis of impacts to residential properties—regardless of whether they are part of a mixed-use building—and commit to mitigation for those impacts.

- 3. *Inadequate consideration of impacts of stadium events in Transportation analysis*: The analysis did not include stadium events in the traffic or ridership analysis, despite acknowledgment that stadium events for three sports teams occur more than one third of the year and concerts and other large events occur between sports events. During scoping of the Project, partner neighborhoods in historic south downtown requested that Sound Transit explicitly include stadium events in the analysis as a baseline condition. Sound Transit should include this consideration in its analysis of baseline conditions in the Final EIS.
- 4. *Underestimation of the impacts of parking losses:* The Cumulative impacts section of the DEIS asserts that changes to the transit system would reduce the need for parking in the study area. It further states that "the project would remove some of the residential and commercial land uses that created demand for this parking." (DEIS, page 5-7)

We believe this conclusion is inappropriate without further consultation with Chinatown-International District and Pioneer Square residents and small business owners. In the Chinatown-International District, for example, feedback from community leaders indicate that short-term parking (on-street, <2 hour) is used by people making trips to the Chinatown-International District to shop, visit residents, dine in a restaurant, drive a senior resident to/from appointments, etc. Transit may not be an appropriate or reasonable alternative mode for many of these trips. We urge Sound Transit to conduct further public engagement on this topic and update its analysis in the final EIS to reflect the true impacts of parking losses—particularly on-street parking—for our communities.

5. *Mis-characterization of "offsetting benefits" in Environmental Justice analysis:* The U.S. Environmental Protection Agency and Federal Transit Administration permit agencies to consider "offsetting benefits" when drawing a conclusion about whether a project has a disproportionately high and adverse impact on environmental justice populations. To count as an offsetting benefit, however, the positive effect needs to disproportionately benefit the affected populations. According to the Environmental Justice analysis, Sound Transit considers better access to transit and job centers to be an offsetting benefit for the residents of the Chinatown-International District. We disagree.

The new light rail station in the Chinatown-International District will enhance a regional transit hub, connecting people from all four corners of the region with buses, commuter rail, and Amtrak. While residents of the Chinatown-International District will partake of this benefit along with everyone else in the region, they will not gain substantially more benefit than anyone else in the region. On the other hand, they will bear the brunt of the impacts of constructing and operating this facility. Consequently, we do not believe it is appropriate to consider access to transit and job centers to be an offsetting benefit.

- 6. *Inconsistency in use of high-cost and low-cost project assumptions:* The technical analyses in the DEIS do not use the same high-cost and low-cost project assumptions. For example, the Economics analysis of the DEIS (pages 4.3.3-1 through 4.3.3-13) indicates that Sound Transit used CID-2a for both the high and low-cost project value to estimate the number of job years (employment) and direct expenditures resulting from the Project. Elsewhere in the economics analysis, CID-1a is listed as the high-cost project alternative in the CID segment. This results in an apples to oranges comparison of benefits generated from employment and local revenue. Similarly, in the Air Quality analysis of the DEIS, "CID-1a" is used as the alternative evaluated for Air Quality standards (page 4.3.6-3), but on page 4.3.6-7, the "low-cost scenario includes CID-2a..." and the "high-cost scenario includes CID-1a.". These differences result in markedly different Greenhouse Gas emissions, again resulting in an apples to oranges comparison. Sound Transit should update its analyses in the Final EIS to address these inconsistencies.
- 7. **Need for more clarity on construction footprint:** The DEIS discloses the approximate amount of area necessary for construction staging areas and easements, but does not show a construction footprint outline. The property impact maps provided in Appendix L.4 do not indicate how the properties would be used or the extent of the use (i.e., full or partial

acquisitions). Without more clarity on construction staging locations or the assumptions of property impacts for construction staging, decisionmakers and the public cannot adequately assess or compare the impacts of construction to the Chinatown-International District.

# WING LUKE MUSEUM

# VIA ELECTRONIC MAIL

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

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

Dear Ms. Swift:

We, the staff of the Wing Luke Museum of the Asian Pacific American Experience (WLM), are pleased to provide these 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.

## ABOUT THE WING LUKE MUSEUM

The mission of the Wing Luke Museum of the Asian Pacific American Experience (WLM) is to connect everyone to the dynamic history, cultures, and art of Asian Pacific Americans through vivid storytelling and inspiring experiences to advance racial and social equity. Founded in 1966 as a tribute to community hero Wing Luke, an immigrant and first person of color elected to Seattle's City Council in 1962, WLM has served as a community anchor within Seattle's historic Chinatown-International District (CID) for over 50 years. Deeply rooted in our community, our exhibition, gallery and neighborhood tours, public programs and events, and permanent collections are reflective of the widely ranged interests and concerns of the many who call the CID home. Programs are designed to encourage active participation in preserving and promoting Asian American, Native Hawaiian, and Pacific Islander (AANHPI) heritage and culture that have impacted and continue to shape the neighborhood's, city's, and region's cultural landscape.

Our 2008 move into the rehabilitated 1910 East Kong Yick Building/Freeman Hotel enabled us to expand our primary activities including neighborhood revitalization efforts. The Museum now stands as the second largest economic driver for the CID, partnering with 65+ small businesses, and attracting patrons to the family-owned businesses and restaurants. WLM gives voice to traditionally underrepresented populations and directly engages everyday community members through our refined Community Advisory Committees (CACs) approach. This programming development process facilitates community members to tell their own stories, outreach within their networks, and produce ongoing exhibitions and programs, resulting in generational community ownership and stewardship, for our Museum and for our neighborhood. Nationally recognized, this method has been effective in growing a diverse visitorship, inspiring participation, and furthering civic engagement.

WLM is a Smithsonian Institution affiliate and was designated a National Park Service Affiliated Area in 2012. This designation resulted from an Obama administration initiative to transform the federal inventory of cultural resources to more completely reflect the whole American cultures, rather than the 94% Euro-American character of current federal resources. The NPS affiliation includes the Museum within the pantheon of national treasures like Mt. Rainier and Gettysburg Battlefield. The recent NPS

Asian American and Pacific Islander Heritage Theme Study (2019) reflects the importance of preserving AANHPI places and stories; WLM led its Pacific Northwest launch and continues to advance its priorities. WLM was named an American Cultural Treasure in 2020 by the Ford Foundation, one of 20 arts organizations of color nationwide to be awarded as recognition of our role in America's cultural landscape and a boost for survival through the pandemic years.

WLM remains the nation's only museum that shares the pan-AANHPI experience encompassing over 26 ethnic groups, and comprising 18% of King County population, 14% of Snohomish County, and 8% of Pierce County, the largest community of color in the region. Our primary audience is 46% AANHPI and 47% white, 4% Latino, 3% African American; 10% of visitors also identified as mixed/other. Of the 75,000 annual visitors pre-pandemic, we reached 20,000 students onsite each year and provided free tours for students who qualify for federal free/reduced lunch. Our free out-of-school programs for middle and high school students, TeensWay and YouthCAN, serve refugee, immigrant and/or low-income AANHPI youth, help build arts and leadership skills as well as strong intergenerational relationships, and cultivate the next generation of leaders within the CID.

Following in the footsteps of past Civil Rights Movement organizers and carrying out our mission to advance racial and social equity, WLM has extended our relationships to other communities of color, working to build solidarity and dismantle structural racism. The Museum has served over the past seven years as a founding member of a collaboration of three communities of color in Seattle, all in neighborhoods significantly threatened by displacement, and dedicated to developing neighborhood assets to build community, through knowledge sharing, shared policy analysis, and joint advocacy. This Race and Social Equity Taskforce (RSET) unified African American and AANHPI communities to support each other. RSET's participation in developing Seattle's 10-year comprehensive growth/investment plan (2016) resulted in producing an Equity Analysis, Equitable Development Implementation (EDI) Plan, and a funded financing plan with specified community-owned projects for implementation.

As such, we hold EDI values, including centering communities most impacted by displacement; community-driven strategies led by community self-determination, influence, and leadership; recognition of the complexity of community needs such as economic development, affordable housing, cultural development, education, healthcare, and food sovereignty; acknowledging historic injustices to address systemic racism and institutional barriers; strong, accountable, accessible, transparent, and culturally appropriate solutions; and valuing of existing community and cultural assets. We also affirm Sound Transit and the City of Seattle's commitment through their Racial Equity Toolkit (RET) process to: limit harmful impacts of the WSBLE Project and work with impacted communities to identify opportunities to repair past harm; maximize connections for all users; and ensure that community shapes the decisions that impact them, through self-determination and with a 100-year vision for future generations.

## SUMMARY CONCLUSIONS COMMON TO ALL ALTERNATIVES

Upon review of the DEIS, participation in many Sound Transit workshops, and in light of our experience and expertise, we have reached the following conclusions common to all alternatives for the Chinatown-International District Segment:

 The DEIS does not adequately encompass the historic reality of past public policies and actions, the everyday lived legacy of those actions to the present-day, and the subsequent real threats to future survival. As such, any conclusions made fall short of depth and breadth of the cumulative impacts from the WSBLE Project.

- The DEIS relies on limited information to evaluate historic and archaeological resources as a result of inequitable practices within the preservation field. Further information needs to be gathered and considered to make a better determination of impacts.
- The DEIS does not adequately recognize the uniqueness of the CID nor takes into consideration emergent threats to its neighborhood cohesion, all the more made evident during the pandemic.
- The Final EIS requires greater clarification on multiple fronts to better assess construction impacts.

### **DETAIL OF CALL FOR FURTHER EXPLORATIONS**

Chapter 5: Cumulative Impacts: Look to the past to understand the present and lead the future
The DEIS does not adequately encompass the historic reality of past public policies and actions, the
everyday lived legacy of those actions to the present-day, and the subsequent real threats to future
survival. As such, any conclusions made fall short of depth and breadth of the cumulative impacts
from the WSBLE Project.

While Section 5.2.2 accounts for some of the past public infrastructure projects impacting the CID, it needs to go further acknowledging the overarching context of race-based Exclusion, which was made manifest in federal and state laws and executive orders, such as the 1886 Chinese Exclusion Act, 1864/1921 Alien Land Laws, and 1942 EO9066 forced removal of Japanese Americans, alongside local ordinances, be it zoning which limited the growth of families by restricting the CID to commercial/industrial and prohibiting single-family home construction or fire code legislation leading to the abandonment of upper-story historic hotels and apartments, destabilizing the neighborhood, and resulting in the CID having the highest concentration of vacant buildings in the city. This same section fails to acknowledge the cumulative impact of past public infrastructure projects, decade after decade, from the 1949 Charles Street Maintenance Facility, to the 1960s I-5 Freeway, to the 1972 Kingdome, to the 1999 baseball stadium, to the 2002 football stadium, to the 2015 Streetcar main and spur line.

The City of Seattle's Equitable Development Initiative acknowledges that historic policies and practices of housing exclusion (aka redlining) has led to present-day access to opportunity and risk of displacement. Indeed, as stated in the City of Seattle's 2016 Equitable Development Implementation Plan, in regard to the CID, "the cultural anchors of this neighborhood are subject to displacement pressures from re-development as well as through the loss of existing buildings due to building failure whether catastrophic or through long-term disintegration." This document rates the neighborhood as "very high risk of displacement, scoring 31.0 out of a citywide risk range of 8 – 32.7." (City of Seattle 2016 Equitable Development Implementation Plan, page 49). The conclusion made in Section 5.4.2 that the "adverse cumulative impact from property acquisition is not expected" is inherently faulty because it fails to take into account the existing present-day conditions of high displacement within the CID and the cascading effect additional displacement can have on an already fragile, strained neighborhood.

Similarly, although Section 5.4.5.1 recounts past development and policies that have resulted in the displacement of CID communities, it fails to adequately quantify those losses and describe their ongoing impacts. The Final Environmental Impact Statement should include more specific information, including whenever possible, numbers of people, businesses, organizations displaced/impacted, and wherever possible, maps and photographs showing the location, type, and scale of the properties. Descriptions of the ongoing losses/impacts as a result of these past actions should be included. By doing so, Sound Transit and communities will have fuller information to evaluate strategies and base decisions.

# <u>Chapter 5: Cumulative Impacts: Apply better practices to evaluate historic and archaeological</u> resources

The DEIS relies on limited information to evaluate historic and archaeological resources as a result of inequitable practices within the preservation field. Further information needs to be gathered and considered to make a better determination of impacts.

When it comes to historic and archaeological resources, sources for the DEIS refer only to the National Historic Register listing and the Washington State WISAARD database, sources that the National Park Service and Washington State Department of Archaeology and Historic Preservation (DAHP) would both acknowledge have their limitations, especially when it comes to communities of color. Indeed, in May 2018, the National Park Service itself published "Finding a Path Forward," a theme study from the National Historic Landmarks Program centering on Asian American and Pacific Islander sites and stories, as a step to address its shortfalls. DAHP has been actively seeking support to further its work through the National Park Service Underrepresented Community Grants program, including a 2020 award to conduct a Filipino American Statewide Context and Survey and a 2022 award focused on Chinese American Exclusion in Washington State.

Leaders in preservation also point out the need to acknowledge both tangible and intangible cultural heritage, broadening preservation practices beyond the architecture, and taking into account the lived experiences and stories of the people. Witness, the National Park Service's own focus on "Tangible and Intangible Cultural Heritage" as integral to its mission (<a href="https://www.nps.gov/articles/tangible-cultural-heritage.htm">https://www.nps.gov/articles/tangible-cultural-heritage.htm</a>); the National Trust for Historic Preservation's National Impact Agenda for the Preservation Movement also calls for the updating and addition of "new preservation tools and practices so more people can recognize, interpret, protect, and activate a larger and more diverse set of historic places and landscapes" (<a href="https://savingplaces.org/goal-expanded-tools#.YmRrjtrMJPY">https://savingplaces.org/goal-expanded-tools#.YmRrjtrMJPY</a>).

While we agree that all alternatives would have an adverse effect on historic properties, the identification of what is "historic" and concurrently, what is not, is faulty because of this flawed data. Summary Tables within 4.3.16 are too narrow in scope and consideration. The determination that individual historic properties are not adversely affected just because they are not directly demolished by the WSBLE Project also fails to take into consideration the interconnectedness of these historic properties to tell a fuller story and create an immersive experience. The absence of consideration for two heritage trails created in partnership with the National Park Service, including the Japanese American Remembrance Trail and the Redlining Heritage Trail, further reflects shortcomings in the DEIS.

For WLM ourselves, while we occupy the 1910 East Kong Yick Building/Freeman Hotel, we regard the CID as our "largest exhibit," have been working to preserve and activate historic properties beyond our walls including Canton and Maynard Alleys, Chiyo's Garden and Nihonmachi Alley, United States Immigrant Station and Assay Office — Seattle, and the William Eng Residence, and bring visitors, families, and school groups on neighborhood tours year-round, with many sites and businesses slated for demolition or directly impacted by construction under the current WSBLE Project alternatives. Previous WLM visitor surveys indicate that the experience of the CID overall as an authentic, immersive cultural destination is of primary importance to our visitors, where they noted planning a trip to the CID first and folding in a visit to the Museum second as part of that overall experience. Any disintegration of the cultural, historic fabric of our neighborhood, which is already suffering dissolution, will have direct impacts to our own visitorship, revenue, and sustainability over the long-term.

<u>Chapter 4: Neighborhood Cohesion and Social Resources: Protect the treasure that we have</u>
The DEIS does not adequately recognize the uniqueness of the CID nor takes into consideration emergent threats to its neighborhood cohesion, all the more made evident during the pandemic.

We concur with Section 4.3.4.1.1 that concludes that the CID has high neighborhood cohesion but disagree with the conclusion in Section 4.3.4.3.3 that the WSBLE Project would not directly impact neighborhood cohesion. Reasons for this include: 1) the geographic size and density of the CID indicates that any disruption to it will have a higher impact on the neighborhood overall; 2) residential spaces, businesses, cultural spaces, and community organizations are interwoven into a tight-knit interdependent network, a legacy of our historic roots as an "ethnic enclave," and any disruption to that network will have ripple effects throughout the system; and 3) since the CID has been a place of respite and belonging in the face of racism, discrimination, and exclusion, harm to any part of the CID (all the more amplified by the perpetuation of past harms) threatens the sense of belonging within the neighborhood overall.

Tragically, the sense of belonging for AANHPIs within the U.S., our region, our city, and even our neighborhood has been broken by the rise in anti-Asian American violence during the pandemic. Where we once considered a safe beacon is now conflated with verbal threats and physical assault; continued boarded up storefronts serve as stark reminders of disregard for and disinvestment in the CID.

Attention to caring for and cultivating this sense of belonging needs to be better attended to throughout the DEIS. For example, Section 4.3.17.3.2 concludes that none of the CID Segment alternatives would have long-term impacts to parks and recreational resources, but if elders and youth no longer feel a sense of belonging in the CID then parks such as Hing Hay Park and the Donnie Chin International Children's Park will lose the people that make them the special places that they are. Similarly, enhancements to the public realm, including directly at the station as well as along routes to it, should foster a sense of belonging, integrating community driven public art designed by community artists, especially those connected to the CID.

# Construction Impacts: Clarification needed on multiple fronts

The Final EIS requires greater clarification on multiple fronts to better assess construction impacts. As they relate to the WLM (and concurrently to the CID overall), they include:

- Insufficient information and inadequate consideration of re-routing of traffic and buses through the CID in Transportation analysis. This will impact pedestrian safety and neighborhood access for our visitors and school groups, who travel to WLM by public transportation as well as private vehicles, as well as our neighborhood tours who walk throughout the district.
- Insufficient consideration of vibration impacts in Noise and Vibrations analysis. With the potential re-routing of buses through the CID, we are especially concerned about vibration impacts to our building, especially related to our areaways.
- Inadequate consideration of impacts of stadium events in Transportation analysis. WLM experiences direct impacts due to stadium event traffic. The Transportation analysis needs to take this into account as well.
- Underestimation of the impacts of parking losses. Parking in the CID has long been an issue and is a top consideration for our visitors (especially families with young toddlers) and community volunteers coming to the Museum. We have witnessed increased concern related to parking with current safety challenges in the CID.

• Insufficient Visual and Noise Impact analysis. Our neighborhood tours are all about sharing the sights and sounds of the CID, whether taking in the view up and down King Street from our 1910 hotel to the Chinatown Gate to King Street Station, standing in the middle of Hing Hay Park to take in its Dragon Mural, Grand Pavilion, Celebrate Happiness Lantern, and Artistic Gateway, or reflecting on the experience of new arrivals or forced removal of others while standing outside King Street and Union Stations. Each tour site also includes guides verbally sharing about the history, as well as asking participants to discuss with the group and introducing them to our neighborhood businessowners.

# CONCLUSION

Thank you for this opportunity to respond to the DEIS. As we have set forth, without deeper exploration of past actions and their impacts on the present to establish a more accurate context for assessing the future, conclusions within the DEIS that claim most cumulative impacts would occur only during project construction rather than project operation or that the project would not directly impact neighborhood cohesion are inherently flawed.

Due to the overwhelming cumulative impacts and threats to neighborhood cohesion, built up over 150 years and amplified by the WSBLE Project, furthering and cascading historical, institutional racism, we are concluding our response with a call for exploration of options for refinements to the proposed alternatives beyond what typically occurs from a DEIS to Final EIS that will not result in displacement within the CID. As our response indicates, without exploration of these refinements, the harm to cultural resources and social cohesiveness is far too great to risk the survival of the CID, a treasured place of belonging and an authentic historic cultural district like no other in the nation. Additionally, due to the direct proximity of the 5th Avenue South alternatives within the CID and along its King Street core, we find the 5th Avenue South alternatives unacceptable and call for the options for refinements to move away from the cultural, economic heartline of the CID.

We also call for additional study by external consultants, working with community partners, to address the numerous requests for additional information or exploration, whether related to historic and archaeological resources or the multiple fronts for construction impacts. Racial equity values are incumbent on centering communities most impacted and putting them in decision-making roles with clear accountability.

CID stakeholders, including us as the Wing Luke Museum, have long been pulling up our sleeves to do the hard work to ensure that the CID is the treasure we have all come to love. We have a wealth of planning resources and experience to draw from, whether the 2016 South Jackson Street Connections report, 2019 Jackson Hub concept plans, 2019 Historic South Downtown Community Priorities list, or the forthcoming 2022-2032 CID Neighborhood Strategic Plan. We are eager to continue work on refinements to the WSBLE Project that do not lead to our community's displacement and strategies that mitigate impacts, build on our cultural assets, and elevate the CID, all integral to our 100-year vision for future generations.

Sincerely,

Joël Barraquiel Tan Executive Director Cassie Chinn

**Deputy Executive Director** 

Cussic C 4/26/2022







### HISTORIC SOUTH DOWNTOWN

# **VIA ELECTRONIC MAIL**

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

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

### Dear Ms. Swift:

The Board of Directors and staff of the Pioneer Square International District Community Preservation & Development Authority (dba Historic South Downtown, *hereinafter* HSD) are pleased to provide these comments on the Draft Environmental Impact Statement ("DEIS") for the West Seattle and Ballard Link Extensions Project ("the Project"), notice of which was issued on January 28, 2022.

On April 26, 2022, the HSD Board of Directors voted to approve the content of the following letter and appendixes, with a vote of 10 yeas with 2 abstentions.

HSD supports the extension of light rail to West Seattle and Ballard, fulfilling a key part of the Sound Transit 3 program approved by voters in 2016. The WSBLE project will transform the region's light rail system and the Chinatown-International District (CID) and Pioneer Square (PSQ). The project carries the potential to create a more connected, accessible regional transportation hub in South Downtown, improving access for commuters using light rail, the Sounder, Amtrak, Seattle Streetcar, Metro, Greyhound, Community Transit and Pierce County busses, and WSDOT Ferries. HSD supports this vision.

In the following, we outline our concerns over the serious, permanent damage posed to the CID by the 5<sup>th</sup> Ave. S. (CID-2a and 2a Diagonal) options, and the potential for the development of a vibrant, connected regional transit hub with 4<sup>th</sup> Ave. S. shallow (CID-1a) alignment. We ask the Sound Transit Board of Directors to center the priorities and needs of the equity-seeking communities of color in South Downtown. Our comment letter consists of this cover letter and three appendices.

# HSD AND SOUTH DOWNTOWN HISTORIC DESIGNATIONS

HSD was created by the Washington State Legislature in 2007 to preserve, restore, and promote Seattle's historic PSQ and CID neighborhoods. HSD exists to help the neighborhoods of PSQ and the CID mitigate and recover from the effects of large public projects. We are governed by a board of directors drawn from the community, elected to represent local businesses, residents, government, arts organizations, non-profits, and historic and cultural organizations from both neighborhoods.

Each neighborhoods contains a core area listed in the National Register of Historic Places, and an overlapping, slightly larger area protected by local historic district designations and related preservation regulations. The National Register (NR) boundaries show that Union Station, the existing ID/C light rail station, and the ID/C plaza are within the Pioneer Square NR district. Maps of the local historic districts show that these areas are contained within both the Pioneer Square Preservation District and the International Special Review District. Additionally, Union Station is individually listed in the National Register of Historic Places.

# **SOUTH DOWNTOWN - DIVERSE, HISTORIC COMMUNITIES**

PSQ and CID are home to Indigenous people, non-English speaking households, immigrants and minorities at higher rates than other Seattle neighborhoods, and higher than any other communities along the proposed Ballard or West Seattle alignments. Both neighborhoods support a high percentage of small, locally-owned businesses, which contribute to the vibrancy of the communities and attract visitors from around the world. The core of the Chinatown historic district is strongly connected to the immigrant Chinese, Japanese, and Filipino communities. A late 2020 survey of businesses in the historic district found that more than 67% meet multiple definitions of "small business" and 88% are Black, Indigenous, or People Of Color (BIPOC)-owned.

Both neighborhoods are at an exceptionally vulnerable point in their 100+ year histories. The COVID-19 pandemic, 2020 protests against racial injustice and police violence, and an epidemic of anti-Asian incidents disproportionately impacted our neighborhoods. The crisis of houselessness that affects all of Seattle and the region is particularly acute in our neighborhoods, particularly in PSQ with its disproportionate concentration of service providers.

Both communities have experienced decades of highly disruptive public infrastructure projects. A consistent theme of these projects is that they generate benefits regionally while the burden of negative impacts is felt primarily locally. In recent years, the projects include construction and operation of two stadiums, the SR99 Deep Bore Tunnel, First Hill and Center City Connector Streetcars, Seawall, Seattle Waterfront and demolition of the Alaskan Way Viaduct, and utility upgrades. All of this has taxed our resources and exposed us more than ever to the corrosive effects of displacement and gentrification.

Despite the challenges PSQ and CID communities face, our neighborhoods are resilient. Although the COVID-19 pandemic and racialized violence have stymied small businesses and sent residents indoors for more than two years, currently we are witnessing the glimmers of an enduring community. The restaurants and cafes are seeing customers return. Neighbors are once again gathering in Hing Hay Park to practice tai chi or play a round of ping pong. Work continues to implement the Jackson Hub Concept Plan, a community-led effort to create a

welcoming, safe area at S. Jackson St. between 2nd Ave. S. and 5<sup>th</sup> Ave. S., where the two neighborhoods meet.

Although the Omicron surge in January delayed the traditional Lunar New Year celebration, community members and people from across the region will gather on April 30 to celebrate together. Long-closed upper floor businesses are returning to PSQ, and Occidental Park is filling its once empty tables with people grabbing lunch or coffee amongst the mature London Plane trees and historic buildings. The interplay between local businesses, residents, visitors, employees, and the celebrations, traditions, festivals, seasonal rhythms and stories has built two unique neighborhoods rich with intangible cultural heritage.

In the early planning of the Project, the City of Seattle and Sound Transit identified the CID as the only neighborhood within a half-mile of the representative alignment with a concentration of communities of color greater than the citywide average, and therefore subject to specific focus and support through the Racial Equity Toolkit (RET). Our neighborhoods—historic, iconic, and home to multigenerational, multilingual, socio-economically diverse Seattleites—deserve this protection and support.

# RACIAL EQUITY AND ENVIRONMENTAL JUSTICE

Like communities of color across the country, the CID and PSQ have been harmed by more than a century of public projects and policies that have, at best, failed to center communities of color and low-income residents, and at worse, baked racist policies into the infrastructure of South Downtown.

Sound Transit and the City of Seattle have partnered to use the RET in the planning and construction of the Project. In relation to the CID, the RET states the joint intent of these public entities is to 1) limit harmful impacts of the project and work with impacted communities to identify opportunities to repair past harm; 2) maximize connection for all users; and 3) [ensure] community shapes decisions that impact them, through self-determination and with a 100-year vision for future generations.

The National Environmental Policy Act (NEPA) does not require an effort as detailed as the RET, but it does require an evaluation of whether the Project would result in disproportionately high and adverse effects on minority and low-income populations, and require Sound Transit's engagement with these populations to encourage their active participation in the planning process. The RET is also consistent with Executive Order 12898, and therefore with the purpose of the Environmental Justice analysis.

To ensure the RET/Environmental Justice analysis appropriately acknowledges the cumulative harm caused by more than a century and a half of public policies and infrastructure projects based in systemic racism, HSD has compiled a list of examples, attached here as Appendix A. Please note that as with many instances of systemic racism, some of these events were initiated to have positive and protective impacts but unintended consequences arose that created new barriers or disproportionate problems for the BIPOC community.

Also please note that while the Environmental Justice analysis references these impacts in the narrative, it does not include them in the documentation of the analysis that led to an Environmental Justice conclusion of no disproportionately high and adverse impact (Appendix

G, Table 5-4, pages 5-31 through 5-66). This conclusion is clearly wrong, as is made obvious by the analysis included in this submission. See infra and attached Appendix A.

# **UNDERSTANDING PAST HARMS AND BROKEN PROMISES**

The RET and the Environmental Justice appendix of the DEIS both seek to address past harms and help to involve community in planning to avoid disproportionate impacts on communities of color. We believe it is important to spell out what some of those past harms have been, and to recognize how more modern projects have allowed systemic racism to overcome stated positive goals, to ignore community priorities, and to break promises made to communities of color. For that reason, we have listed examples of racist practices, attacks, incidents, redlining, and even well-intentioned policies that have increased barriers, going back more than a century. See Appendix A.

Union Station was built in 1911 and brought the Oregon and Washington Railroad regional rail into south downtown. It served until 1971, when Amtrak consolidated into King Street Station. Early planning in 1973 began to explore using a facility designed to handle thousands of passengers for multimodal transit. It was studied again in 1985, 1989, 1992, and finally 1998 when it became the headquarters for newly-formed Sound Transit. The building is still underutilized, even after almost 50 years of studies. While return of passenger rail access to the building is listed in the DEIS as an adverse impact due to construction disruption and partial property acquisition, we believe that a thoughtfully-designed adaptation could return integrity of use, feeling, and association to this iconic building that stands as an entrance to downtown Seattle and the intersection of two historic districts.

In numerous outreach activities over the course of the WSBLE project, Sound Transit staff have engaged the community in visioning exercises to surface community priorities and goals. *These outreach efforts were required and necessary* in the context of this ambitious transit project. However, for many people in South Downtown, the overwhelming feeling is that we have been here before.

In 2019, the City of Seattle, Sound Transit, and King County agreed—at the request of a coalition of South Downtown stakeholders—to partner with us to review past outreach outcomes and consolidate what community members have been saying for the past 20 years about our interests, needs, concerns, and priorities. This review revealed remarkable consistency over the course of decades. The City, Sound Transit, and King County also agreed to incorporate many of these neighborhood self-defined priorities into future projects plans that affect our communities—including this Project. These priorities are:

- 1. Retain or increase community ownership of properties
- 2. Improve public safety
- 3. Enhance community vitality and sustainability
- 4. Encourage economic development
- 5. Enhance public health and well-being
- 6. Acknowledge and address historic racism that has and continues to impact neighborhoods
- 7. Minimize cumulative harm to and/or displacement of existing businesses, residents, and nonprofits
- 8. Activate common areas

- 9. Increase economic diversity in businesses and residents
- 10. Improve mobility and connectivity
- 11. Retain historic and cultural character
- 12. Support a small business environment
- 13. Ensure that people across Seattle and the region continue to visit the neighborhoods, even during construction

In recent years, Seattle, King County and Sound Transit staff have worked with PSQ and CID stakeholders on implementing the Jackson Hub Concept Plan, published in 2019. This is an example of ways that governmental units are working to center community priorities and accomplishing shared goals. However, there is still no actionable result from the Concept Plan work. The RET is another opportunity for our governmental partners to illustrate support of equity-seeking communities and demonstrate that promises will be kept.

To ensure that Sound Transit and the City of Seattle meet their stated outcomes of: 1) limit[ing] harmful impacts of the project and work with impacted communities to identify opportunities to repair past harm; 2) maximiz[ing] connection for all users; and 3) [ensuring] community shapes decisions that impact them, through self-determination and with a 100-year vision for future generations, the DEIS must center the values and priorities of the people of the CID.

## FIFTH AVE. S. IMPACTS

The proposed 5<sup>th</sup> Ave. S. alignments (CID-2a, CID-2b, and CID-2a Diagonal), would break the promises and stated goals of the RET. The direct, permanent impacts on four to six National Register-eligible/-listed buildings, with additional indirect and construction impacts on another four+ buildings and would constitute a significant adverse effect on two National Register-listed historic districts. With the addition of parks, it also results in a significant increase in use impacts under 4(f) (1 resource versus 3-4 resources).

There is an open question as to whether the long-term, direct, and indirect impacts of the 5<sup>th</sup> Ave. S. options could be mitigated at all. Is the loss of intangible cultural heritage something that could be addressed monetarily? Would mitigation programs accomplish their goals within a predictable timeline? HSD does not think so. Instead, this Project requires design that avoids the catastrophic impacts of carving up two blocks of the CID.

A 4<sup>th</sup> Ave. S. alignment *shifts* the impacts and trade-offs for a *regional* transportation system outside of a fragile, historic, ethnic neighborhood that was red-lined into existence. The entities who would be impacted with the siting of the station on 4<sup>th</sup> Ave. S., in general, have stronger financial infrastructure to bear the burdens. A 4<sup>th</sup> Ave. S. choice would distribute the impacts equitably across the region, be primarily economic, and suited to the current mitigation guidelines.

Additionally, a station constructed between existing transit options bears the potential to smooth the rider's experience when moving between modes of transit. The 4<sup>th</sup> Ave. S. alignment would support implementation of significant parts of the Jackson Hub Concept Plan, particularly in regard to connections between neighborhoods and transit. It would increase pedestrian infrastructure and align signals to prioritize pedestrian and transit-rider experiences in this important corridor, which would have lasting benefits to both PSQ and the CID.

# **DEEP STATION OPTIONS SHOULD NOT MOVE FORWARD**

After careful review of the WSBLE DEIS, the HSD Board does not believe that either of the deep tunnel options, CID-1b or CID-2b, meet the stated goals of creating a user-friendly mass transit system and interconnected transit hub around Union Station and King Street Station. They also do not meet the community goals of connectivity between transit and the CID and PSQ neighborhoods.

We do not believe the deep options—with their elevator-only access and longer transfer times—serve to support the neighborhood or the region. Even a bank of eight elevators will be unable to keep up with crowds during major events (e.g., football, soccer, or baseball games, or Lunar New Year), or when there are mechanical problems. Nor will elevator-only access be viable if there is another global pandemic, making it unsafe to ride in an elevator with a non-household member. We fear that elevator-only access will lead people to disembark or transfer at a different station with less onerous transfers, undermining multiple goals for the performance of the new station. The deep options would also make light rail transportation inconvenient for residents of PSQ and the CID. With all these challenges, we believe that CID-1b or CID-2b diminish the project's purpose and need and should therefore be removed from further consideration.

DIRECT, INDIRECT, SHORT- AND LONG-TERM IMPACTS OF 5<sup>TH</sup> AVE. S. ALTERNATIVES In 2022, if you were to stand on the plaza of the International District/Chinatown (ID/C) light rail station at S. King St., you would physically be in both the CID and the PSQ historic districts.

Around you, the ID/C station plaza is bordered by the early 20<sup>th</sup> century brick architecture of Union Station, and steel and glass architecture of early 2000s development. The 1990s ID/C plaza has brick paving and steel trellis superstructures, with art and poetry elements worked into the plaza so subtly that they have been forgotten. The steel and glass architecture of the buildings to the south and west of the station house some of the only chain food businesses within the two historic districts. The glass reflects the historic buildings across 5<sup>th</sup> Ave. S.

To the east, you see the heart of Chinatown, framed by the Historic Chinatown Gate. It is an active commercial area, but one still recovering from the coronavirus pandemic and the attendant rise in anti-Asian violence.

Storefronts along 5<sup>th</sup> Ave. S., particularly north of S. King St., have suffered from the lack of commuter and daytime business traffic, but the small storefronts along S. King St. are still active. The corner building houses Joe's Bar, a small local dive that has been a tavern or bar dating back to at least 1938 – five years after the end of prohibition - when it was Mrs. Ko Nishiyama's Beer Parlor. A few storefronts down S. King St., Seattle's Best Tea, a Taiwanese tea and boba shop that has been open since 1996 in a space that used to house a billiards parlor and a Thai market, but that now serves boba devotees. These anchors support traffic to new businesses like Chung Chun Rice Dogs, which opened in one of these smaller, affordable spaces, and which is something of an Instagram sensation

South of the Gate, the Publix is a 21<sup>st</sup> century success story, rehabilitated from its early single-room occupancy hotel configuration to a market-rate apartment rental, with a new apartment

building on the south, complementing the historically contributing architecture. Both Publix buildings, along with the commercial buildings to the north, have ground floor retail, small local businesses contributing to the vibrant entrepreneurial community of the CID.

Behind the Publix is a parking lot and a low, one-story brown stucco building with a striking blue tile roof - the old Uwajimaya grocery store - now known as the Nagomi Plaza. Behind the Nagomi Plaza is the new Uwajimaya, a multi-story building with apartments rising above the grocery store, food court, and a few other small businesses that activate the street fronts.

Most of this area is either owned or occupied by local, minority families, who have built up businesses, educated children, and passed on a commitment to the CID community.

### What will this neighborhood look like in 2042?

Per the DEIS, if either CID-2a or CID-2a diagonal are built, the locally-owned parcels will have been purchased by Sound Transit. A ventilation tower and emergency exit structure will sit in the middle of what had been the Nagomi Plaza parking lot. The rest of the block between the back of the Publix, 6<sup>th</sup> Ave. S. and S. Weller St. will be vacant. The station entrance will sit across the street, on another almost completely vacant lot, with bike storage and another empty lot at the opposite corner of that block. The community will be working to define what happens next. At that point, how will the potential TOD plan incorporate the communities' long-stated priorities? Once the Historic Chinatown Gate is surrounded by empty lots, how will Sound Transit engage to restore the intangible cultural heritage that was lost along with the buildings and businesses?

#### **Economics and Cultural Practices are Intertwined in Chinatowns**

The DEIS acknowledges that the CID has strong social cohesion, as well as high risks for displacement, defining neighborhood cohesion as "the extent to which residents have a sense of belonging to their neighborhood ... consider[ing] the interactions between the residents and the resources in the neighborhood" (DEIS 4.3.4.1.1; 4.3.4.3.3).

Chinatowns have always been a combination of economic participation in white culture while being refuge from that dominant culture. The space that mediates this relationship for a group that has been deemed a perpetual "other" is imbued with intangible cultural heritage: traditions, manifestations, and living expressions of living culture, knowledge, and skills, including languages and festivals.

Seattle's CID is unique in bringing together Chinese, Japanese, Filipino, Vietnamese, and Cambodian immigrants together in a space that defined by their "otherness" but which has built that identity into a strength of community identity. Unlike any other neighborhood along the WSBLE corridor, the CID provides a space for belonging through culturally-competent social services, recreational and cultural spaces, and culturally-relevant small businesses.

The CID houses a tradition of immigrant entrepreneurship, often transferred down generations, creating family wealth and stability that was otherwise impossible for Asian immigrants to access. Economic and cultural impact cannot be considered separately from one another in this neighborhood.

# CID-1A, $4^{TH}$ AVE. S. SHALLOW, ALIGNS WITH COMMUNITY PRIORITIES AND AVOIDS HARMFUL IMPACTS TO COMMUNITIES OF COLOR

The 4<sup>th</sup> Ave. S. shallow option, CID-1a, is the alternative that avoids, rather than attempts to mitigate, unmitigable cultural impacts. And more importantly, the 4<sup>th</sup> Ave. S. shallow option allows Sound Transit and the City of Seattle to partner in a project that will create a thriving regional transit hub and move forward important and long-delayed priorities of the surrounding communities, including ideas proposed in the Jackson Hub Concept Plan.

The benefits of a 4<sup>th</sup> Ave. S. shallow option will benefit the community and the region by truly fulfilling a 100-year vision. It will:

- 1. **Improve mobility and connectivity**: shallow options mean easier and more convenient transfers between light rail lines and easier access to other transportation modes. A 4<sup>th</sup> Ave. S. alignment provides direct transit connections to both the CID and PSQ neighborhoods, as well as the most direct connections to Sounder, Amtrak, and the stadiums. With the pedestrian underpass, it improves the pedestrian experience for people using light rail or just trying to get across 4<sup>th</sup> Ave. S.
- 2. **Activate common areas**: CID-1a would activate Union Station by reviving its original purpose as a train station. By serving as the location for the new light rail station entrance, and a connection between the existing and proposed stations, the revived Union Station would be readied for further successful activation. However, any programming activation must be fully funded.
- 3. **Improve public safety**: Additional activation of Union Station, the S. Weller St. Pedestrian Bridge, and the 4<sup>th</sup> Ave. S. and S. Jackson St. intersection with pedestrians will improve public safety. This serves to enhance public health and well-being by increasing pedestrian safety and connectivity between the CID and PSQ neighborhoods. The City's Station Planning Progress Report also identifies pedestrian improvements to be made around the station, which would further increase these benefits.
- 4. **Minimize cumulative harm to and/or displacement of existing businesses, residents, and nonprofits**: This community priority meets the RET outcome goal, as well, and a 4<sup>th</sup> Ave. S. alignment will avoid the displacement of 19-27 small businesses in the CID along 5<sup>th</sup> Ave. S., S King St., 6<sup>th</sup> Ave. S., and S. Weller St. Additionally, by moving the core construction outside of this fragile ethnic neighborhood, the impacts of the project are shared regionally rather than locally by small, minority-owned, undercapitalized businesses.

Increasing economic diversity in businesses and residents, encouraging economic development, and retaining/increasing community ownership of properties are additional goals that are best viewed under cumulative harm, as the economic and cultural life of the CID and PSQ are intertwined. These priorities will require Sound Transit to work with the communities and the City to identify needs, barriers, and opportunities to improve the long-term sustainability and viability of these important historic neighborhoods in Seattle.

HSD aims to support a small business environment and asks Sound Transit and the City to join us in this goal, which will enhance community vitality and sustainability and retain historic and cultural character. In different ways, both PSQ and CID are neighborhoods developed by small, local entrepreneurial businesses, with their mixed-use buildings and housing residents behind and above the businesses that provide employees and patrons.

- 5. **Ensure that people across Seattle and the region continue to visit the neighborhoods, even during construction**: By avoiding construction impacts on 5<sup>th</sup> Ave. S., S. King St., and S. Weller St., the CID is protected from massive construction disruption, allowing the businesses, non-profits, and cultural cohesion to continue on their current path, attracting locals and visitors from around the world to visit. Similarly, PSQ would not suffer the same level of construction impacts they have faced in recent projects. The design of the construction mitigation plans will be key in achieving this goal, and communities should be involved.
- 6. Acknowledge and address historic racism that has and continues to impact neighborhoods: Appendix A has a starting list for acknowledging past impacts of government actions on these neighborhoods. Addressing them should be incorporated into the FEIS in the cumulative effects section, along with designed mitigation and project mitigation that attempts to leave the communities with increased equity post-Project construction.

#### ADDITIONAL STUDY IS NEEDED TO ADDRESS 4<sup>TH</sup> AVE. S. IMPACTS

Every effort to improve our regional transit network will involve trade-offs. As discussed above, HSD does not believe the trade-offs called for in the 5<sup>th</sup> Ave. S. options provide sufficient benefit or can be effectively mitigated.

This does not mean that the CID-1a 4<sup>th</sup> Ave. S. alignment is without substantial impacts. There are many outstanding questions that remain unanswered in the DEIS. HSD is requesting that the Sound Transit board commit to a period of additional study and transparency of 4<sup>th</sup> Ave. S., to answer these many remaining questions and allow for a thorough mitigation plan to be developed. Some specific points to highlight:

- The additional study requested is not intended to delay to the WSBLE timeline. Rather, HSD requests that Sound Transit staff continue to engage with the community as it answers the questions listed below (and others that arise) so that community can be involved in the direction forward, instead of passively receiving the Final EIS next year.
- Chief among the concerns is the projected cost overrun. Sound Transit has engaged in voluntary cost refinements on other segments of the proposed alignment. It must do an aggressive refinement for the 4<sup>th</sup> Ave. S. Shallow option as well. HSD is asking Sound Transit to right size the 4th Ave. S. alignment and station within the budget and apply design strategies to shrink the cost. Apply the same kind of innovative thinking and creativity and effort used to generate the 5th Ave. S. diagonal alternative (a station proposed by Sound Transit to address the challenges they have identified for CID-2a), to explore improvements and refinements to CID-1a.

- What construction practices or design refinements can Sound Transit and City of Seattle utilize to manage detours, traffic diversions, and minimize road closures?
- Bus routes DO need to be maintained during construction. Can buses and transit be given priority on what remains of 4th Avenue during construction?
- What will the impact be on the S. Weller St. Pedestrian Bridge?
- Can the impact on Ryerson Bus Base be further reduced?
- How can haul routes be reoriented outside of the CID and PSQ neighborhoods, with their small-scale pedestrian environments, areaways, historic buildings, and concentration of human services?
- Sound Transit should address how surge events during construction can be managed.
   Additionally, the FEIS should address how the new CID station design will accommodate surge events in operations.

#### ADDITIONAL STUDY NEEDED IF 5TH AVE. S. ALTERNATIVES PROGRESS

If the Sound Transit Board decides to proceed with study of the 5<sup>th</sup> Ave. S. alignments, additional study and cost estimates for substantive, transformational mitigation must be included. These include:

- A community ownership commitment for any parcels of land designated for equitable transit-oriented development. For example, investigate the feasibility of a community land trust or other non-traditional models and creative approaches to community ownership.
- Additional study of the economic feasibility of TOD within the context of the International Special Review District regulations, considering community capacity and financing. As TOD is intended to increase density around transit hubs, but the CID and PSQ are already high-density neighborhoods, can additional density be achieved within the historic district regulations?
- An understanding of the cultural importance of small business ownership and small
  unofficial incubator spaces must be developed to facilitate proper mitigation and
  relocation packages for affected small businesses. In a small business district like the
  CID, businesses exist within a network of other small businesses. Relocations have
  ripple effects. Sound Transit needs to assess these effects or provide support for
  community organizations to study this, prior to settling on a mitigation package.
- Funding to support small local businesses with non-English speaking proprietors to prepare to engage in the Uniform Relocation Act, including bookkeeping and legal support, based on lessons learned engaging with Rainier Valley businesses dealing with mitigation in ST1.
- Funding for community organizations in the CID and PSQ to hire additional staffing and/or contractors and develop programs to assist their constituents and visitors to prepare for construction impacts, navigate the construction period, and advocate for community vision until the promised TOD is complete.
- Any effort to activate Union Station while siting the new station on 5<sup>th</sup> Ave. S. should include mitigation funding to operate and manage the property as long as and until the operation becomes self-supporting.
- The loss of the cultural fabric is problematic and will require creative efforts to mitigate.
   It is possible that community-defined metrics could be created to measure ongoing diversity and vitality of life in the CID and PSQ. Attention should be paid to forces that

promote gentrification or displacement, including median rents of residential and commercial real estate, percent of local ownership, and other indicators. Funding would be needed to define an appropriate study, to reassess periodically (every year at first, then perhaps every five years for a total of 20 years after the TOD is complete) and to provide remedies for the long-term, indirect impacts that are identified at Project outset and in the future.

Additionally, given the unique historic neighborhoods present in the CID segment of the Project, we suggest that additional analysis on cumulative effects be presented to demonstrate the impact of the largest public infrastructure project in the city of Seattle's history on the two oldest neighborhoods in the city. The past infrastructure projects in the neighborhood have benefitted a regional transportation network to the detriment of these equity-seeking communities. We applaud Sound Transit's state goal to repair past harms, and support every effort to ensure these promises are fulfilled.

#### CONCLUSION

Based on review of the current information, we believe that the CID-1a 4<sup>th</sup> Ave. S. shallow option offers the greatest potential to achieve community priorities, create direct connections between PSQ and CID neighborhoods, and improve transit connections between modes. However, there is a need to clarify cost, traffic and transit impacts, construction phasing and staging, and construction management plans for the 4<sup>th</sup> Ave. S. option and reengage community prior to the completion of the FEIS. We believe CID-1a comes the closest to delivering both local and regional benefit while protecting the irreplaceable cultural core of the CID neighborhoods.

HSD is grateful for this opportunity to comment on the DEIS, and the efforts of Sound Transit staff to reach out to our diverse communities. We look forward to continuing to work with Sound Transit board and staff to ensure the successful completion of the most ambitious and costly public project undertaken in Seattle's history.

Sincerely,

Docusigned by: Kathleen Barry Johnson

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Kathleen Barry Johnson Executive Director 4/27/2022 DocuSigned by:

Dana Phelan

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Dana Phelan President, Board of Directors 4/27/2022

#### **Attachments:**

Appendix A: Listing of past racist or racially impactful policies, projects and incidents

Appendix B: Detailed list of DEIS comments and questions

Appendix C: Matrix of community priorities and impacts of pending options

CC: Sound Transit Board of Directors, Seattle City Council, King County Council, The Honorable Mayor Bruce Harrell and The Honorable County Executive Dow Constantine, The Honorable Representative Sharon Tomiko Santos, The Honorable Representative Kristen Harris-Talley, The Honorable Senator Rebecca Saldaña, The Honorable Senator Maria Cantwell, Senator Patty Murray, The Honorable US Representative Pramila Jayapal, The Honorable US Representative Adam Smith







# HISTORIC SOUTH DOWNTOWN APPENDIX A Harmful Government Actions

# Government Policies, Actions, Inactions resulting in inequitable and/or racially-motivated negative impacts

This list was compiled in conversation with community members in South Downtown and is not intended to be a comprehensive list of impacts on these two historic neighborhoods. We have attempted to group these examples by time and type of activity, and to give some context where possible as to the impact of the actions.

We intend this list to provide examples for guidance when the City and Sound Transit state their intent to "identify opportunities to repair past harm." To repair, one must first acknowledge and name the harm. Then one must seek to understand these communities to cease causing inadvertent harm (see "Neglect & Erasure" section below)

### Overtly white supremacist measures

After the Civil War, the United States began to formalize its claims on the West Coast. Governments began making laws that preferred the rights of white, European immigrants, stigmatizing the status of being non-white, and setting the stage for 1-1/2 centuries of discrimination and marginalization. Examples of these laws include:

- 1864 Alien Land Laws (state-level)
  - Initially, taking of native property by European settlers, then prohibited or took land ownership from Native Americans and, eventually, immigrants of color, who were also denied citizenship.
- 1865 Exclusion of Native Americans from living within Seattle City limits
- 1882 Chinese Exclusion Act
  - o prohibited naturalization and created first immigration exclusion based on race and place of origin. Repeatedly renewed and reinforced for 8 decades.
- 1942 Executive Order 9066
  - In addition to incarcerating Japanese immigrants and Japanese-American citizens, this rule also forced many to sell land, businesses, and personal property at a loss. Exceedingly few people were able to reclaim their property after the end of WWII, leading to a drastic reduction in the size of Nihonmachi.

# Health and safety regulations with overt white supremacist intent, racist impacts, or unintended and inequitable consequences

Public health measures have a history of being promoted as a strategy for "encouraging" non-white laborers and entrepreneurs to return to their countries of origin. Other cases, like

protective fire codes, were well-intended but imposed a sudden and unanticipated cost of operating residential units. In Chinatown, many building owners simply stopped renting residential space, leading to housing shortages that persist to this day. Examples include:

- 1885 Cubic Air Ordinance
  - Uneven enforcement in Seattle and other west coast cities specifically targeted Chinatowns.
- 1970s Fire codes resulting from the Ozark Fire
  - Measures were necessary fire safety improvements, but implementation created additional burdens on local building owners. Many owners simply stopped renting residential spaces, leaving vacant upper floors and housing shortages that continue to this day. Inequitable access to capital for code improvements exacerbated the issues then and now.
- 2012-present City discussion of unreinforced masonry buildings seismic retrofit upgrade codes, which would place an additional burden on the PSQ and CID neighborhoods with their high proportion of URMs.

#### Civic improvement, infrastructure, renewal projects

Publicly funded projects, beginning well before WSBLE, have too-often been the excuse to tear down parts of the CID, destroying thriving businesses and residential neighborhoods, and creating a smaller and smaller CID. All were done in the service of "progress," and many inequitably benefitted the larger city or region but with impacts born primarily by these two small historic neighborhoods in south downtown.

By centering on values such as modernization and other white-focused ideas, public projects in the past have labeled parts of the CID as "blighted" or in need of renewal, refusing to value the ethnic livelihoods and culture that had taken root in one of the very few places that were accessible to Asian immigrants. Examples include:

- 1910 Jackson Street Regrade
  - o displaced thriving Chinese and Japanese communities
- 1928 2<sup>nd</sup> Ave. Extension Construction
  - o eliminated "Chinatown #2," which had been in Pioneer Square.
- 1941 Yesler Terrace construction
  - While creating innovative integrated public housing, took large tracts of land from Nihonmachi (Japantown) and displaced immigrants who did not have the citizenship necessary to qualify for this public housing
  - Currently being rebuilt ongoing.
- 1949 Construction of Charles Street Yard by City of Seattle
  - Displaced thriving Chinese neighborhood.
  - Similar impacts were continued/expanded during the conversion to a maintenance facility (1963) and the addition of the Seattle Streetcar spur line (2012).
- 1970s Kingdome Construction, Operation and Demolition, Replacement by new Stadiums
  - Kingdome community impacts were intended to be mitigated by the 21 Stadium Impact Resolutions passed by the City, but funding ran out in three years.
  - Baseball Stadium (1997).
  - o Seahawks Stadium & Exhibition Center (2000-2002).

- Operation of stadiums causes traffic congestion, transit congestion, sidewalk congestion, public drunkenness, littering, and sometimes violence, with inadequate public support to mitigate the public safety hazards. The Stadiums' governing organizations participate in a community benefits process, which is helpful, but which requires ongoing staffing and funding, even to this day.
- Transportation projects cause major construction impacts and ongoing increased pollution, degraded pedestrian services, increased traffic and "surge" events. These projects definitely delivered higher levels of service to the neighborhoods of PSQ and CID, however they are also prime examples of projects that deliver the vast majority of benefits to regional or even national interests but leave the burden squarely in the impacted neighborhoods. In the past, the design of many of these projects has created new public safety concerns.
  - o 1960s Interstate 5/Seattle Freeway construction
    - Demolished about half of Yesler Terrace (20 years after it was built) removing low-income housing from the neighborhood.
    - Permanently, physically divided the CID.
    - Created a dark, damp "no-man's land" beneath the highway (at least a block wide) where homelessness and drug dealing thrive.
    - Effort to turn areas around the highway structure into greenbelts created hidden (and not hidden) camping areas, led to the development of the notorious "Jungle" encampment.
    - Removed mixed housing and industrial properties throughout the 9<sup>th</sup> Ave.
       S. corridor.
  - o 1987-1990 Construction of Downtown Seattle Transit Tunnel (now ID/C station)
    - the PSQ headhouse continues to be a public safety concern, based largely on its design.
  - 1990s construction of Interstate 90
    - More dark "no-man's lands."
  - o 2009-2019 SR 99 Tunnel construction and Viaduct demolition (2019)
  - o 2012-2016 Streetcar construction, utility relocation work
    - Jackson Street, 1<sup>st</sup> Ave. S., and the 8<sup>th</sup> Ave. S. spur line which was related to Charles St. potential redevelopment, yet to happen.
    - 2017 1<sup>st</sup> Ave. S. utility relocation in preparation of City Center Connector. Both CID and PSQ neighborhoods were promised that major City Center Connector construction-related disruptions would pay off when the entire streetcar system was connected. As of the date of this letter, the City Center Connector streetcar is stalled, and is likely never going to be built.
- Ongoing Waterfront Reconstruction
  - While the eventual public amenity created by a vibrant waterfront will benefit the neighborhoods as well as the city and region, the construction impacts and detours have been onerous for small businesses and neighborhood residents. It should be noted that while PSQ is part of a taxation Local Improvement District (LID), the existing plans for redevelopment stop at Coleman Dock and start again at Railroad Ave., skipping most of the PSQ waterfront. Planning for Pier 48 seems to be constantly out of reach, as other interests and their needs are prioritized above the neighborhood's.

#### Zoning and land use decisions

As with public health measures, zoning and land use decisions have often provided cover for covertly white supremacist measures (e.g. redlining), but at other times have been instituted for

all the right reasons, with insufficient thought given to unintended consequences. Examples include:

- Repeated rezoning leading to instability in Little Saigon area and the neighborhood surrounding the core historic CID
  - 2012 Livable South Downtown rezoning of Little Saigon area, followed by 2017 Housing and Livability Agenda rezoning around the entire CID
    - Increased building heights in and around Little Saigon twice in a decade caused sale of properties at escalating values that priced out local organizations and long-term property owners.
  - Raised concerns for owners of industrial and warehouse properties about how long they could continue to do business with increased pressures on their properties.
  - Necessary housing is being built without the cultural connection and community ownership that will maintain the vitality and identity of Little Saigon.
  - Overall, community organizations in both PSQ and CID support additional housing affordability, but inequitably bear the burden of this increase when compared to many primarily residential neighborhoods in Seattle, with the unintended consequence of creating a concentration of low-income housing.
- Concentration of human services city and county policies during 1960s-'70s public policy shifts, consolidated major human services, courts, public safety activities in PSQ.
- 2018 Expansion of International Special Review District
  - Expansion extended the district east from 10<sup>th</sup> Ave. S. to Rainier without sufficient outreach to local businesses and property owners, resulting in feelings of erasure, confusion, and concern within the community.

#### **Neglect & Erasure**

Many of the above examples could also be classified as attempts at erasure. As a red-lined, marginalized community, the CID and PSQ are rarely afforded the attention regularly offered to less diverse areas with fewer minorities and immigrants. Constantly needing to assert one's right to inhabit parts of the city causes generational trauma, suspicion of government intent and disenfranchisement from civic process. Examples include:

- Lack of basic maintenance areaways, alleys, utilities, curbs and streetscapes, landscapes have not been consistently maintained by the City.
- The accidental elimination of Manilatown. In 2017, Seattle sought to define the CID by ordinance, and neglected to include the history and extant vibrancy of the Filipino community. While Manilatown was added to the bill in a subsequent measure, the need for a people to combat erasure has left an emotional toll.
- No street under Canton Alley for 100 years paid for by community.
- Lack of culturally responsive public safety and related services the International District Emergency Center began in late 1970s to fulfill this need.
- Failure to include PSQ in many of the measures and evaluations in the WSBLE DEIS.
   Even though Union Station, Union Station Plaza, and the existing ID/C station are under
   the jurisdiction of the Pioneer Square Preservation Board, and most of PSQ is within a
   10-minute walkshed, documents and presentations rarely include PSQ by name. As a
   result, PSQ stakeholders find themselves in 2022 needing to assert their existence
   and ask for consideration to avoid harm.

## APPENDIX B: DETAILED LIST OF HSD'S DEIS COMMENTS AND QUESTIONS

		Question	Question or Comment				
Page or or							
Acquisitions, displacements, and			Consideration of the impact of business displacements should be given with special attention to businesses owned by people of color, immigrants and non-English speakers. Experience in the Rainier Valley during ST 1 has showed that these types of small businesses are vulnerable to under-estimates of the business value, cost of relocation, and reimbursement for lost business. This may be due to informal accounting practices or other factors. Sound Transit's determination of Relocation Assistance or Mitigation should include a rigorous and low-barrier valuation process, with a focus on working with minority and non-English				
relocations	4.3.14	_	speaking business owners.				
Alternatives Considered	2-88	Q	DEIS states cut-and-cover methods will be used to build CID-1a and 2a alternatives. Why does the extent of rebuilding the 4th Ave. S. bridges extend all the way to Main Street? Why not engage in mining the tunnel closer to S. Jackson St.? What is driving the bridge rebuilding north of Jackson?				
Alternatives Considered	2-88		DEIS states that deeper stations will be mined. What is driving the surface bridge and roadway impacts for CID-1b (4th Ave. S. deep) if the station for that segment would be mined? Why will there be more substantial impacts to 4th Ave. S. bridges if that station will be mined?				
Alternatives Considered	2-91		DEIS discloses approximate amount of area necessary for construction staging areas and easements, but the document does not indicate any construction footprint outline. Where is Sound Transit assuming construction staging COULD occur for the project within the CID segment? The property impact maps provided in Appendix L.4 do not indicate what the properties are used for, or the extent of the use (full or partial acquisitions). Where are the property impacts or assumptions for construction staging?				
Alternatives Considered		Q	What is the capital cost of CID-2a diagonal? Are there cost savings realized for not having to disturb all the utilities of CID-2a? What about all those properties?				
Appendix L4.1 Acquisitions	Maps and tables		What is the assumed disposition of the parcels along 4th Ave. S. that would be completely disturbed for CID-1a and 1b and the site of a proposed tunnel ventilation building?				
Appendix L4.1 Acquisitions	Maps and tables		Would CID-2a, diagonal, or 2b result in the demolition of the Nagomi Plaza (old Uwajimaya) building? ST # BD 5021				
Appendix L4.1 Acquisitions	Maps and tables		Would CID-2a, diagonal, or 2b result in the demolition Seattle First National Bank building itself? ST # BD 5027				
Appendix N.1	6-1, 6-25 - 6-36		Evaluation of transit integration at the ID/C station should be part of the decision to site the station either on 4th or 5th. Evaluation of transit integration needs to include all Link lines, all bus lines, Sounder, Amtrak and WS Ferris. The Jackson Hub Concept Report and integrating work done since 2000 should continue to be referenced and consulted during station area planning.				
Appendix N.2 Visual Quality Technical Report		Q	Why wasn't Hing Hay Park and Union Station evaluated for operational impacts of having a tunnel ventilation system in the viewshed?				
Appendix N.5 Historic and Archeaological Resources Technical report		Q	Why wasn't the Nagomi Plaza building (eligible for listing on NHRP) evaluated under Section 106? ST # BD 5021				

CE	7	Q, C	Without more detail regarding the statement that "the project would remove some of the residential and commercial land uses that created demand for this parking," it is unclear what this means for CID, which would experience a permanent loss of parking. What are the land use changes in CID that would correspondingly reduce parking demand? Or is this based on looking at parking loss vs. land use change for the entire project corridor? If its the latter, we have serious concerns, as this type of analysis is neither accurate nor relevant to EJ impacts.
CE	7	С	The conclusion that the changes to the transit system would reduce the need for parking in the study area is inappropriate without a parking study. In the C-ID, for example, anecdotal evidence suggests that short-term parking (on-street, <2 hour) is used by people making trips to the C-ID to shop, visit residents, dine in a restaurant, drive a senior resident to/from appointments, etc. Transit may not be an appropriate or reasonable alternative mode for many of these trips.
CE	8	Q	What are the construction projects that would take place in the CID and PSQ during the ST construction period? Would SDOT continue to issue street use permits for private construction that severely limit already constrained travel and parking for these neighborhoods?
CE	9	С	In response to point that relocations may not necessarily be in the same neighborhood, it must be noted that place is critical to CID; if people are relocated from CID, this could materially impact community cohesion. (on the other hand, we should examine the ICON building resident makeup and determine the extent to which this building contributes to community cohesion)
CE	10	Q	Per earlier comment, relocating in project vicinity is less important in CID than relocating within CID. What is the retail and office vacancy rate in the CID?
CE	10	С	Given history and the lack of policies to control/manage gentrification/cost increases in Seattle neighborhoods, it is likely that WSBLE would contribute a cumulative impact to already fragile businesses in CID and PSQ.
CE	11	С	In the CID and PSQ, it is as much about year after year of construction impactsplus racialized violence and pandemic that disproportionately impacted BIPOC, seniors and unhoused peopleas it is about simultaneous construction projects. This should also be addressed in Cumulative Effects.
CE	11	С	In response to the conclusion that neighborhoods becoming more expensive is an indicator of economic growth (and the implication that this is a benefit), this may be true from a macro standpoint, but from an EJ standpoint, economic growth that primarily benefits the most affluent does not offset disproportionate impacts to the least affluent.
CE	12	С	In response to this conclusion"as neighborhoods revitalize, amenities and community resources also often improve, which can increase the quality of life for both new and remaining members of the community,"from an EJ and community standpoint, these assumptions are highly problematic. A community value that was heard over and over again in the 20 years of plans and studies in the CID and PSQ was the importance of retaining community ownership and not displacing people descended from families who have lived in these neighborhoods for generations, and not displacing businesses that have existed for generations. From an EJ standpoint, this whole paragraph represents a high and adverse disproportionate impact, not a benefit.
CE	13	С	The conclusion that changes as a result of the project would cumulatively benefit neighborhood is only an EJ benefit if the local businesses and residents can hang on during construction and don't find themselves priced out after (or evicted for redevelopment).
CE	13	Q	Regarding relocations, need to understand if the proposal is to relocate within the "project vicinity," i.e. the whole corridor, or the neighborhood where these originated? Froom an EJ standpoint, these need to be relocated to the same neighborhood to continue meeting the need.
CE	14	Q	Need more detail on how ST's Equitable TOD and the City's Mandatory Affordable Housing requirements would play out in CID and PSQ. Is this a commitment, or just hopes and wishes? Whatif anyproof of concept to City of Seattle and ST have with these complementary programs? How will historic district regulations impact this program?
CE	24	С	RE: "most cumulative impacts would occur during project construction," we disagree with this statement. The cumulative effects of gentrification and displacement are related as much to operations as construction and has been grossly understated in this document.

	1		What is the status of the vindust structures on 2nd Ave Ext. 2 and 2 legices 24.2 Sound Transit mode to include the material
			What is the status of the viaduct structures on 2nd Ave. Ext. S. and S. Jackson St.? Sound Transit needs to include the potential
			foreseeable need to renovate these neighboring structures in their Cumulative Impacts analysis, including an assessmment of the impact on rebuilding these bridges on the 4th Ave. S. struture and any potential need to tie back those bridges to 4th.
CE	Global	Q	Information from SDOT's bridge inventories should support this study.
OE	Global	Q	
			Economics analysis indicates that Uwajimaya loading dock, entry plaza, and parking garage would be affected temporarily by construction activities, but the transportation analysis doesn't disclose impacts along 5th or 6th Avenues extending south of S.
Economics	4.3.3-14	Q	
ECOHOMICS	4.3.3-14	Q	Weller Street. What construction activities would occur that would disrupt the loading dock and parking garage?
			Is the DEIS analysis treating private parking lots (surface and sub-surface) as business displacments, or only accounting for them in the "loss of parking" analysis in the transportation section? Is the economics analysis treating the Union Station parking
Economics	4.3.3-14	Q	garage, 6th and King surface lot, and Bank of America lot as businesses? Considering it an impact? Temporary displacement?
ECOHOTHICS	4.3.3-14	Q	
EJ	97	С	No mention of PSQ in the economics section. Surely there are economic impacts on PSQ as a result of cumulative construction impacts, parking removal, traffic diversion, etc.
⊑J	91		No mention of public safety anywhere in this document. This seems like an oversight; public safety (defined in multiple ways,
EJ	Global	С	including safety from racialized violence, bike/ped safety) is of high importance to the CID and PSQ
L3	Global		Even temporary displacement of some residents could impact community cohesion. While this is a fragile neighborhood,
			community cohesion is strong and potentially a key factor in the neighborhood's survival. This section does not adequately
			address the impacts of relocations/displacements on community cohesion. That said, we are not yet convinced that displacement
EJ	102	С	of ICON is going to be impactful on community cohesion, given the makeup of building residents
EJ	102	Q	Has ST met with resident from Eagle Village to understand how this relocation would impact them?
	102		Why PSQ is not included in this discussion. What are the potential impacts of traffic diversions, 4th ave closure, streetcar
EJ	102	Q	disruption to community cohesion for PSQ?
	102		The social section should mention the risks of gentrification (see Central District as example) and how that would impact
EJ	102	С	community cohesion.
			RE: "No additional impacts" (Visual Effects). This is incorrect. There would be a large tunnel vent facility placed directly in front of
EJ	106	С	Union Station under Options 1a and 1b.
			RE: "No airborne noise impacts." This is not correct. According to the Noise and Vibration Technical Report, ST did not test for
			noise impacts in the CID because it considers it to be a "commercial district," even though it acknowledges there are residential
			properties nearby (e.g., Publix, Uwajimaya, Downtowner, Hirabayashi Place). We disagree with the conclusion that because City
			of Seattle treats residential use properties within commercial districts the same as commercial properties, Sound Transit is not
			obligated to test and mitigate for noise impacts to these residences. See page 127 of the Noise and Vibration Technical Report
EJ	109	С	for reference.
			PSQ and CID are unique along the corridor in that they host a number of public services for cultural communities and unhoused
EJ	114	С	individuals. Those should be mentioned here and the potential impacts on them detailed
			The conclusion that impacts to historic resources will affect minority people the same as everyone else is wrong. The CID is the
			only neighborhood along the alignment with impacts to historic properties (according to this table), and these properties are of
EJ	116	С	particular importance to minority communities.
			Construction impacts and visual impacts to the viewshed to Hing Hay Park should also be mentioned in Social section (impacts
EJ	118	С	to community cohesion).
	Table 5-		No indirect or cumulative effects row? Why not? This is a major impact on EJeven the RET says this.
EJ	4	С	The manest of camalative enects low: vvny not: This is a major impact on Loeven the NLT says this.

EJ	Table 5-	С	The economic analysis does not address the loss of cultural context for the businesses that will be relocated under CID-2, or appropriateness of replacement buildings, particularly in terms of the community priorities of local ownership, loss of affordable storefront spaces such as the existing ones that serve as an incubator for small, locally owned businesses. New ideas need old spaces because they are affordable. The "mom and pop" business needs affordable spaces too. The economic analysis of the impact on the CID, for all the CID-2 options (5th Ave S) must include the long-term impact on the type of businesses that are currently located in the CID.
EJ	Table 5- 4 pg 5- 40	С	The land use analysis assumes that the replacement of current buildings with new TOD buildings will be a benefit to the neighborhood and the BIPOC populations living there. This is not a reasonable conclusion when the buildings to be replaced are already owned and occupied by many minorities. Local ownership is a key priority for the community and is seen as a way to ensure the cohesiveness of the area. The land use analysis should not tout replacing minority and locally owned parcels with other developments that are unlikely to return to commmunity and minority ownership.
EJ	125	Q	Mis-characterization of "offsetting benefits" in Environmental Justice analysis: The U.S. Environmental Protection Agency and Federal Transit Administration permit agencies to consider "offsetting benefits" when drawing a conclusion about whether a project has a disproportionately high and adverse impact on environmental justice populations. To count as an offsetting benefit, however, the positive effect needs to disproportionately benefit the affected populations. According to the Environmental Justice analysis, Sound Transit considers better access to transit and job centers to be an offsetting benefit for the residents of the Chinatown-International District. We disagree.
EJ	130	С	The new light rail station in the Chinatown-International District will enhance a regional transit hub, connecting people from all four corners of the region with buses, commuter rail, and Amtrak. While residents of the Chinatown-International District will partake of this benefit along with everyone else in the region, they will not gain substantially more benefit than anyone else in the region. On the other hand, they will bear the brunt of the impacts of constructing and operating this facility. Consequently, we do not believe it is appropriate to consider access to transit and job centers to be an offsetting benefit.
EJ	7-2	С	If, as the DEIS says "Sound Transit is partnering to evaluate strategies to maintain and enhance community cohesion" why are we not reading about existing strategies that may be considered in this? Why are we not reading about the ways in which ST and the city work together on planning in this? The lack of even rudimentary process discussions in these sections do not give community confidence in the future work of these processes.
General Analysis	Global	С	Inconsistency in use of high-cost and low-cost project assumptions: The technical analyses in the DEIS do not use the same high-cost and low-cost project assumptions. For example, the Economics analysis of the DEIS (pages 4.3.3-1 through 4.3.3-13) indicates that Sound Transit used CID-2a for both the high and low-cost project value to estimate the number of job years (employment) and direct expenditures resulting from the Project. Elsewhere in the economics analysis, CID-1a is listed as the high-cost project alternative in the CID segment. This results in an apples to oranges comparison of benefits generated from employment and local revenue. Similarly, in the Air Quality analysis of the DEIS, "CID-1a" is used as the alternative evaluated for Air Quality standards (page 4.3.6-3), but on page 4.3.6-7, the "low-cost scenario includes CID-2a" and the "high-cost scenario includes CID-1a.". These differences result in markedly different Greenhouse Gas emissions, again resulting in an apples to oranges comparison. Sound Transit should update its analyses in the Final EIS to address these inconsistencies.
General Analysis	Global	С	<b>Need for more clarity on construction footprint:</b> The DEIS discloses approximate amount of area necessary for construction staging areas and easements, but does not show a construction footprint outline. The property impact maps provided in Appendix L.4 do not indicate how the properties would be used or the extent of the use (i.e., full or partial acquisitions). Without more clarity on where construction staging would occur or the assumptions of property impacts for construction staging, we cannot adequately assess or compare the impacts of construction to the Chinatown-International District.

General Analysis	Global	С	The CID-2a diagonal station configuration appears to have markedly different impacts than the CID-2a configuration, and the track path varies between the two options. There are no graphics at a reasonable scale in the draft EIS that illustrate the distinctions between the two options. More explicit treatment of 2a-diagonal as a separate condition should occur so that people can clearly see what amounts to real differences between roadway impacts, property impacts, business impacts, and so on. It is not included in all appendices.
General analysis	Global	С	The over 70 sporting events, concerts, and other events at the stadium complexes was not considered in the DEIS, despite community requests in the scoping phase of the Project. Additionally, PSQ and the CID have festivals and other events that bring thousands to the neighborhoods. These "surge" events and the traffic they create (both vehicular and transit), must be included and evaluated for their effect on the systems both during construction and long-term.
Historical/Archaeologi	4.3.16	С	Area of potential effect needs to be expanded to include potential haul routes for preferred alternative in terms of mapping areaways, as the maps will help determine where haul routes can be placed without additional street reinforcement, an additional cost to the project if necessary.
Noise	127	С	"Commercial and industrial districts are in the Chinatown-International District Segment Although there are no nearby residential districts near the segment there are mixed use properties with residences in commercial districts, such as Uwajimaya and the Publix Hotel. Residential use properties within commercial districts are treated the same as commercial properties within the city of Seattle." While this may be an acceptable policy by noise analysis standards, it should be unacceptable from a RET standpoint. ST should be expected to conduct a noise analysis of impacts to residential properties and commit to mitigation for those impacts.
Noise	4.3.7-11	Q	For Table 4.3.7-3, what is the distribution of impacts by property? The figure only shows two areas (along 5th near Weller and Washington) what is the distribution of impacts, and by option? 2a vs. 2a-diagonal?
Noise (N.3)	Global	Q,C	No operational noise analysis was conducted for the CID segment, and therefore for the CID neighborhood, because tunneled options were not considered in the analysis. However, tunnel ventilation systems are identified within the neighborhood, and will be a new source of noise and visual blight. What are the potential noise impacts to surrounding residents and park users from operating a tunnel system at the proposed location?
Noise (N.3)	6-37	Q	For construction noise impact analysis, ST and analysts assumed CID neighborhood is a commercial/industrial neighborhood, and treated "residential use properties the same as commercial properties" per City of Seattle codes. Does this mean that residents were not considered explicitly in the analysis in the same way they would be if their home was located in a residential neighborhood? Please explain.
Noise Figure 4.3.7-2	4.3.7-7	С	Visuals do not show the diagonal station configuration nor track alignment, which differs from CID-2a through the CID neighbhorhood. Difficult to discern or understand impacts without understanding the layout and analysis.
RET	10	Q	What is ST and the City's legal obligations to fulfill the commitments outlined in the RET? What mechanisms do communities have to hold them accountable?
RET	Global	Q	It is unclear whether reference to the C-ID throughout this document includes PSQ or not. Please clarify.
RET	11	С	Change: Limit harmful impacts of project and work with impacted communities to identify [AND IMPLEMENT] opportunities to repair past harm.
RET	16	С	The RET commits to an outcome of limiting harmful impacts of project and work with impacted communities to identify opportunities to repair past harm, and yet the Cumulative Effects report barely acknowledges this and it does not appear cumulative effects are even considered as part of the EJ conclusion. Not mentioned in land use, economics, or transportation sub-sections. Some acknowledgment in the Social sub-section. Included in narrative of EJ section, but not included in documentation of analysis that led to an EJ conclusion of no disproportionate high and adverse impact.
RET	39	Q	Has ST met with Chief Seattle and/or Eagle Village residents to discuss the impacts of this potential reloction? If so, what were the outcomes of those conversations? (i.e., if Eagle Village was already planning to relocate independent of this project, this is not really a project impact. On the other hand, if the project is causing them to relocate, that is an entirely different issue. Same questions apply to the newly-leased spaces along Seattle Boulevard where the Salvation Army will be expanding services for houseless community members.

			1.
DET		_	Has ST gathered community feedbackparticularly from commercial/retail businesses in the C-IDabout the impacts of parking
RET	42	Q	losses, including differences in impacts of on-street vs. off-street parking losses? What was this feedback?
			"ST is currently partnering with the community and other agencies on a community-based planning effort for the area to evaluate
			strategies to maintain and enhance community cohesion" through station design. If station planning is to be considered mitigation
			for loss of community cohesion, additional information on structuring this "community-based planning effort" will be needed to
Social Resources, etc	4.3.4.3.3	С	allow communities to comment on the benefits of the process.
			If the 4th Avenue deep station is as deep as claimed, and statements in the DEIS indicated that mined stations would have less
			ground disturbance why is the extent of disturbance at the surface so long for 4th Ave deep (CID-1b), especially at 2nd Ave
	Table		Extension? Why would that segment of roadway be closed for 6.5 years? There do not appear to be any bridges along 4th
Transportation	N1.E-25	Q	Avenue north of Main Street what is contributing to the extent of roadway disruption north of S. Jackson Street?
	Table4-		Key roadway impact #7 for CID-2b, Is the full extent of S. Jackson St. (2nd Ave. Ext. to 5th Ave. S.) partially closed, or just the
Transportation	53	Q	intersection?
Transportation and			How will alternatives CID-1a and CID-1b affect the 4th Ave. S. bus island just north of S. Jackson St.?
Transit		Q	Tiow will alternatives CiD-1a and CiD-1b affect the 4th Ave. 3. bus Island just north of 3. Jackson 3t.?
			According to the impacted parcel maps and alternative construction descriptions, CID-2a, 2a diagonal impact parcels north of the
			Goodwill outlet that appear to be part of the KC Metro Central Base. According to the plan sheets, the tunnel portal and
			ventilation system are located on King County parcels. Construction roadway impacts listed suggest that 6th Ave S adjacent to
			the Central Base would sustain partial closures for 6-9 months. Based on the information presented in the DEIS, it is unclear
Transportation and			what project activity affects each parcel. What are the explicit potential impacts to KC facilities? Is the Goodwill outlet facility
Transit		Q	impacted for all 5th Avenue Options and Alternative?
			Why is the Ryerson Bus Based considered permanently closed for this alternative? The tunnel portal appears to be located
Transportation	Table 4-		further south near S. Massachusetts, and the mining appears to begin at the portal what is occcuring at the surface or on the
Technical Report	53	Q	property that renders the base closed?
			The analysis did not include stadium events in the traffic or ridership analysis, despite data and statements in the draft indicating
			that stadium events for three sports teams occur more than 1/3 of the year, and acknowledging that concerts and other large
Transportation			events occur between sports events. Historic South Downtown stakeholders requested Sound Transit explicitly include stadium
Technical Report	general	Q/C	events in the analysis as a baseline condition. Please explain why this was not considered.
			Construction impacts to the Donnie Chin International Children's Park (7th Ave. S.) and/or the ID/C Community Center and
			Library (8th Ave. S.) need to be considered if construction diverts bus traffic to either street. 8th Ave. S. may have construction
Transportation/	4.3.17.4.		projects during the Project construction timeline, which should be considered, as well as the impacts to senior and family
Transit	3	С	housing, ICHS clinic, and the Denise Louie daycare.
			The Transportation Technical Report states that CID-2a would impact truck streets along 6th Ave. S. north and south of Royal
			Brougham way. Plan sheets and other information in the draft EIS suggest that construction of CID-2a diagonal in this vicinity is
			approximately the same as CID-2a, and could yield the same effects. Statements made in the transportation technical report
Transportation:			state that the diagonal station configuration would not impact truck streets. Is this accurate, and if so, why is CID-2a diagonal
Freight Mobility	N.1 9-3	Q	different in the vicinity of Royal Brougham, than CID-2a?
			•

## APPENDIX C: MATRIX OF SOUTH DOWNTOWN COMMUNITY PRIORITIES AND IMPACTS OF PENDING OPTIONS

Community Priorities	CID 1a (4th Ave. S. shallow)	CID 2a (5th Ave. S., shallow)	CID 2a Diagonal (5th Ave. S., shallow, diagonal configuration)	Environmental Justice and Racial Equity context for Decision-Making
Minimize cumulative harm to and/or displacement of existing businesses, residents, and nonprofits	Longest construction durations of all the options, but it would move the worst of the construction impacts away from most businesses and residential structures. Will disrupt bus service, which could negatively impact businessesses, residents and visitors.  Construction disruptions would be constant for the years of station and tunnel construction for residents at the Icon Apartments. All units of this complex (up to 120 market rate residential units) would be displaced for a year during 4th Ave. S. bridge rebuilding activity. Building is a mix of long-term rentals and hotel/Air BnB short-term housing. Building will remain standing, so housing will be available after construction.  Fewest direct disruptions and relocations to local businesses in CID or Pioneer Square.  No loss of on-street parking or loading zones within the CID or Pioneer Square during construction	Biggest loss of local retail/commercial businesses in the CID neighborhood (compared to 1a and 1b).  Loss of commercial load zones and on-street parking during station and cut-and-cover tunnel construction (up to 9 years).  Would displace Chief Seattle-Eagle Village Pilot (if it hasn't already relocated). Need to clarify how Chief Seattle/Eagle Village residents feel about this (e.g., if they are already planning to relocate independent of the WSBLE project, this isn't much of an impact).  Construction disruptions would be constant for the years of station construction for residents at Uwajimaya Village, Fujisada Condominium, Publix Building, and Bush Hotel.	Shortest construction durations of all the options.  Same loss of local retail/commercial businesses as 2a, but with additional "temporary" displacements of approximately 9 months.  Loss of commercial load zones and on-street parking during station and cut-and-cover tunnel construction (up to 6 years).  Would displace Chief Seattle-Eagle Village Pilot (if it hasn't already relocated). Need to clarify how Chief Seattle/Eagle Village residents feel about this (e.g., if they are already planning to relocate independent of the WSBLE project, this isn't much of an impact).  Construction disruptions would be constant for the years of station construction for residents at Uwajimaya Village, Fujisada Condominium, Publix Building, and Bush Hotel.	Decisions regarding construction that disrupts the heart of the CID should be made only after familiarizing yourself with past harms and priorities set by the community. This project comes in the wake of numerous other projects, events, and policies that have centered the needs of regional interests rather than the needs of the equity-seeking communities who live and work in the PSQ and CID neighborhoods. While 4th Ave does require collaborative work to reduce negative impacts on buses and other constituencies, it centers the priorities of the people of the CID and PSQ, and shares burdens regionally.
Retain or increase community ownership of properties	Unknown until Sound Transit provides more information about the disposition of the 2.5 acres of urban center property displaced by this part of the project.  No displacement of small business serving the local neighborhoods.	Permanent displacement of up to 13 businesses and temporary displacement of up to 8 businesses in 4 buildings. One of those buildings contributes to the local National Register district, and two others would be individually eligible for listing based on preliminary assessments during 106 review.	Permanent displacement of up to 13 businesses and temporary displacement of up to 8 businesses in 4 buildings. One of those buildings to the local National Register district, and two others would be individually eligible for listing based on preliminary assessments during 106 review. Additional impacts to businesses in the American Hotel and the Buty building.	The EIS must surface specific plans to retain or increase community ownership of parcel aquired by Sound Transit after construction is completed. Funding support for local organizations must support staffing for appropriate engagement with the planning processes. Mitigation should continue until the completion of any TOD projects.
Improve public safety	Assuming construction impacts adversely affect public safety, construction duration may be the longest of the five alternatives, but may have less direct impact on C-ID.	Assuming that construction impacts adversely affect public safety, shorter than 1a and 1b but longer than deep alternatives. Because of proximity to heart of C-ID, however, it will have more direct impact (noise, dust, visual impacts, etc.)	Shortest construction duration; however most construction would occur in the heart of CID. Noise, dust, and visual impacts could result in avoidance. Pedestrian detours will need to be provided between CID and existing light rail station; station construction could act like a "barrier" between existing light rail station and CID.	Based on prior work in the CID, lighting and accessible sidewalks are important aspects of community public safety and equitable access to transit.  Consideration should be given to the large population of elders living in the CID.
Enhance community vitality and sustainability	Offers the most opportunities for promoting connectivity, mobility, and neighborhood connections in the "Jackson Hub" area of high transit access. Opportunities for activating Union Station first as a passenger terminal and then building on that may also offer additional activation of the surrounding plazas, as well as promotion of cultural and economic vitality of surrounding neighborhoods.	Property acquisition by ST for station construction and staging theoretically creates more opportunity for TOD and affordable housing post-construction than CID-1a and 1b. ST's eTOD policy requires it to "prioritize affordable housing," however, mechanisms for accountability and proof of concept are unclear. The businesses that would be displaced under this option are primarily local small businesses, many owned by POCs. Replacement is not the same as enhancement.	Property acquisition by ST for station construction and staging theoretically creates more opportunity for TOD and affordable housing post-construction than CID-1a and 1b. ST's eTOD policy requires it to "prioritize affordable housing," however, mechanisms for accountability and proof of concept are unclear. The businesses that would be displaced under this option are primarily local small businesses, many owned by POCs. Replacement is not the same as enhancement.	The benefits of eTOD to the CID and PSQ are unclear here. An activated Union Station has the potential to invigorate the transit hub, provide a welcoming entry point to the cultural and business communities in PSQ and CID.
Encourage economic development and increase economic diversity in businesses and residents	4th Ave. alternatives put Union Station directly to use as a transportation hub, by serving as the location for the new light rail station entrance, and a connection between the existing and proposed stations. Using Union Station would be a first step toward activating the building for more public-facing use.  There would be no apparent loss of on-street parking or commercial loading zones in the CID district resulting from construction staging activities.	Parcel impacts inside the CID neighborhood would serve as opportunity to redevelop existing parcels and buildings within the project footprint area. TOD opportunities are possible.  During construction of the project, full closures of S. Weller and S. King St. between 5th and 6th Avenues would adversely impact small businesses on those blocks. Businesses would have difficulty receiving deliveries. Loss of on-street parking reduces access to residents and small business in the area. Depending on the level of impact to the pedestrian environment, the retail and restaurant storefronts would likely lose foot traffic and customers.	Parcel impacts inside the CID neighborhood would serve as opportunity to redevelop existing parcels and buildings within the project footprint area. TOD opportunities are possible.  During construction of the project, full closures of S. Weller and S. King St. between 5th and 6th Avenues would adversely impact small businesses on those blocks. Businesses would have difficulty receiving deliveries. Loss of on-street parking reduces access to residents and small business in the area. Depending on the level of impact to the pedestrian environment, the retail and restaurant storefronts would likely lose foot traffic and customers.	Construction along 5th Ave. S. minimizes traffic issues for the region while expecting them to be born by blocks of businesses in a pedestrian-friendly, small ethnic neighborhood that already bears disproportionate burdens for the regional transportation system.  Construction along 4th Ave. S. moves the burden of construction to the region rather than centering it in the CID.

Enhance public health and well-being	Station construction on 4th Ave. S. would introduce opportunties to enhance and improve the pedestrian environment in the 4th Ave./2nd Ave. Ext./S. Jackson St. area, which benefits PSQ, CID, and transit riders on all modes.  Because 1a is cut-and-cover tunnel construction, it would be among the loudest options to construct (88dBa at 50 feet from source—the equivalent of a lawnmower or motorcycle), for durations of 4-6 years.  Depending on the extent of 4th Ave. S. reconstruction, surface construction noise could still reach 84-89 dBA for bridge construction activities within 50 feet of a receiver. The Icon apartments would be the closest residents to construction activities.  Depending on the state of the viaduct structures beneath 2nd Ave. Ext. S. and S. Jackson St., consolidating those rebuilding efforts could prevent multiple local, major construction projects in the same area.  A tunnel ventilation system located in front of Union Station at the corner of 4th Ave. S. and S. Jackson St. would face residents of the Icon Apartments, and	Because 2a is a cut-and-cover tunnel construction, it would be among the loudest of the options (88dBa at 50 feet from source—the equivalent of a lawnmower or motorcycle), for durations of 4-6 years. Additionally, construction on 5th Ave. S. would move noise, dust and other pollution closer to where more people live and work.  Construction in the heart of the CID would result in prolonged increase of heavy truck traffic to excavate and build the new station. Large trucks would travel through the small streets at a rate of 10-35 trucks per hour, 5 to 6 days per week, increasing pedestrian and resident exposure to heavy vehicle traffic, truck exhaust, noise, dust, and increased pedestrian/truck conflict at intersections.  The new station infrastructure would span across two blocks, and a new tunnel ventilation system and stair egress would be located on the Nagomi Tea House property, which faces residents at the Uwajimaya Village to the south, Fujisada Condominium to the east, and Publix building to the west.	2a diagonal would be a mined station with reduced traffic impacts from CID-2a. This configuration is inconsistently addressed in the DEIS materials, and its impacts are not fully understood.  Construction in the heart of the CID would result in prolonged increase of heavy truck traffic to excavate and build the new station. Large trucks would travel through the small St.s at a rate of 10-35 trucks per hour, 5 to 6 days per week, increasing pedestrian and resident exposure to heavy vehicle traffic, truck exhaust, noise, dust, and increased pedestrian/truck conflict at intersections.  The new station infrastructure would span across two blocks, and a new tunnel ventilation system and stair egress would be located on the Nagomi Tea House property, which faces residents at the Uwajimaya Village to the south, Fujisada Condominium to the east, and Publix building to the west.	It is unclear if the Downtowner and Hirabayshi Place tenants, residential and commerical, would be affected by 4th Avenue construction. An assessment of noise impacts is necessary for all the options.
Acknowledge and address historic racism that has and continues to impact neighborhoods				while this community priority is acknowledged in passing in the Environmental Justice section, Appendix A of this letter contains a list of historic racist and governmental actions that have adversely mpacted the south downtown neighborhoods.
Activate common areas	4th Ave. S. Alternatives (CID-1a and 1b) put Union Station directly to use as a transportation hub, by serving as the location for the new light rail station entrance, and a connection between the existing and proposed stations. Using Union Station would be a first step toward activating the building for more public-facing use.	All 5th Ave. S. options create new common areas in the CID (replacing privately held properties) by building a new station entrance, ancillary building spaces, and bicycle storage along 5th and 6th Avenues S.	All 5th Ave. S. options create new common areas in the CID (replacing privately held properties) by building a new station entrance, ancillary building spaces, and bicycle storage along 5th and 6th Avenues S.	Any activation to be done by community organizations must be funded long-term.
Improve mobility and connectivity	Shallow options mean easier and more convenient transfers between light rail lines, and easier access to other transportation modes (bus routes, streetcar). 4th Ave station plans would provide station access on both the east and west sides of 4th Ave.  4th Ave. presents the most difficulties for current bus lines during construction; prioritization of transit maintenance will be important in construction management plans.  Provides direct transit connection to both CID and PSQ neighborhoods.  More direct connections to bus routes serving Georgetown, and existing access to Sounder and Amtrak	Shallow options mean easier and more convenient transfers between light rail lines, and easier access to other transportation modes (bus routes, streetcar).  5th Ave options provide slightly more direct connection to, streetcar, and bus routes serving Beacon Hill, Little Saigon, and Central District, but only one new entryway for the new station. Fifth Ave. S. options also require the rerouting of all Metro electric Trolley busses.  Efforts to minimize the footprint of 5th Ave. S. station options is not compatible with the object of the Project resulting in a 100 year vision for the station, its connections, safety and activation.	Shallow options mean easier and more convenient transfers between light rail lines, and easier access to other transportation modes (bus routes, streetcar).  5th Ave.options provide slightly more direct connection to, streetcar, and bus routes serving Beacon Hill, Little Saigon, and Central District, but only one new entryway for the new station. Fifth Ave. S. options also require the rerouting of all Metro electric Trolley busses.  Efforts to minimize the footprint of 5th Ave. S. station options is not compatible with the object of the Project resulting in a 100 year vision for the station, its connections, safety and activation.	Maintenance of bus routes should be a priority in construction management plans regardless of the alignment chosen.  Construction along 4th Ave.should come with the opportunity to explore ways to enhance pedestrian infrastructure.
Retain historic and cultural character	Approximately 20-foot tall tunnel vent placed in front of Union Station, which will havevisual impacts and conflicts with Pioneer Square Preservation Board regulations.	Demolition of 418 5th Ave. S. (which houses multiple small businesses), Nagomi Plaza (519 6th Ave.S), and 525 S. Jackson Street (Seattle 1st National Bank-International District Branch), which are considered historic buildings.	Demolition of 418 5th Ave. S. (which houses multiple small businesses), Nagomi Plaza (519 6th Ave.S), and 525 S. Jackson Street (Seattle 1st National Bank-International District Branch), which are considered historic buildings. Additional impacts for this alignment include temporary closures of both the historic American Hotel and the history Buty Building for	A review of historic district regulations should be done to see how Union Station reuse plans and ventilation needs for the tunnel can be planned to minimize adverse effects to the historic building.

Support a small business environment	All options provide new underground connections between light rail stations, which could potentially reduce pedestrian traffic to small business in the vicinity of the stations.  Reinvigoration of Union Station as a a passenger terminal building creates feasible, sustainable options for integration of promotion of neighborhood businesses. For example, a local coffee shop could staff a coffee cart, or the Wing Luke and Klondike National Park could share a kiosk to promote their museums, offer tours.  All stations would result in a small conversion of parking along 5th Ave. S, to passenger load for transit.  4th Ave. S. Alternative and Option would not result in any additional on-street parking loss during construction or operations.  This option would impact approximately 200 parking spaces of the 1,086 stall Union Station Parking Garage.	authentic need for people to walk in and out of the building. The City of Seattle, the Community and other stakeholders have - quite literally - been studying ways to reuse Union Station as a community ammenity for 50 YEARS without success. It is clear that successful reuse of the building would require a great deal of expense in terms of consulting and long term operational support.  All stations would result in a small conversion of parking along 5th Ave. S, to passenger load for transit.  CID-2a would result in a temporary loss of on-street	ammenity for 50 YEARS without success. It is clear that successful reuse of the building would require a great deal of expense in terms of consulting and long term operational support.  All stations would result in a small conversion of parking along 5th Ave. S, to passenger load for transit.  CID-2a would result in a temporary loss of on-street parking within the CID neighborhood, which is known to reduce traffic to small businesses. The complete closure of S. King St. and S. Weller St. would have direct impacts on small businesses that would not be actually displaced by construction.	Construction will affect the business environment, but much less so if aligned to 4th Ave. S. than to 5th Ave. S. Indirect impacts can be addressed through support and information, while construction cutting off pedestrian access or "temporary" 9 month business closures will adversely affect the local business district.
Ensure that people across Seattle and the region continue to visit the neighborhoods, even during construction	to CID neighborhood during construction. Increased "barrier" of construction between CID and Pioneer Square neighborhoods. Pedestrian detours to get around construction may increase the walking distance and result in avoidance. Transit users may	Temporary but high impact (noise, dust vibration) construction effects on Hing Hay Park (construction will be across the street); temporary impacts to Uwajimaya Village, including loading dock, parking garage, and entrance plaza.  Pedestrian detours needed from existing light rail station to CID would be long, and could potentially create a barrier to visiting CID during construction.	construction effects on Hing Hay Park (construction will be across the street) and neighborhood residents	The CID and PSQ experienced disproportionate impacts from the COVID-19 pandemic, and extensive ongoing public projects that preceded the pandemic. Temporary mitigation during construction would need to include signage, promotion, and other necessary support for small businesses.

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# Martin Smith Inc

April 27, 2022 *via. Email* 

c/o Lauren Swift Sound Transit 401 South Jackson Street Seattle, WA 98104

Re: Comments of Martin Smith Inc on the Draft West Seattle and Ballard Link Extension (WSBLE) project draft Environmental Impact Statement (EIS)

Dear Ms. Swift:

Thank you for considering our comments on the WSBLE draft EIS. Martin Smith Inc and our affiliates own and operate a portfolio of office and retail properties in downtown Seattle, with several of our buildings located within the Pioneer Square Historic District. The alternatives for the Chinatown-International District ("C-ID") segment will be within the boundaries of the Pioneer Square Historic District or directly abutting it. Impacts from the station and track alignment will directly affect our properties and the fragile Historic Districts of both Pioneer Square and the C-ID. Construction of all alternatives will have significant adverse impacts on Pioneer Square, yet the EIS does not discuss impacts to our neighborhood. We have been working closely with our partners at Alliance for Pioneer Square and we echo the comments, issues, and mitigation ideas suggested in their EIS comment letter.

We believe Sound Transit should study the Fourth Avenue shallow station (CID-1a) alternative further. We believe this alternative meets more of the regional long-term transit needs than the other alternatives. In addition, further study can help to reduce impacts to transit and traffic, seek to shorten construction duration, and reduce costs. This alternative would center the new light rail station within the existing transportation hub, closer to more existing transportation, transit, and event facilities, offering greater opportunity for connectivity and infrastructure development that benefits the whole Puget Sound region, not just Seattle.

We request that Sound Transit communicate any alternative development studies and findings as soon as possible, and well before any formal NEPA or other environmental documents are published.

We look forward to working with the Sound Transit Board of Directors, Sound Transit, our City of Seattle officials, and Alliance for Pioneer Square to inform the decision to select the right preferred alternative for this once-in-a-generation regional project.

Sincerely,

Ryan Smith

President

Martin Smith Inc



April 27, 2022

Ms. Linda Gehrke Regional Administrator Federal Transit Administration 915 Second Avenue Suite 3142 Seattle, WA. 98174-1002

In future correspondence please refer to: Project Tracking Code: 2019-02-01457

Property: King County\_ West Seattle To Ballard Light Rail Extension

Re: Draft EIS Comments

Dear Ms. Gehrke:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. In response, we have reviewed the Draft EIS materials you provided for this project.

We look forward to continuing consultation on the potential affects the federal undertaking poses to historic properties, in which we anticipate being consulted upon a revised Area of Potential Effect (APE) once a preferred alternative has been selected. Please ensure to consider an APE that sufficiently considers physical, auditory, visual, cumulative, environmental, socio-economic, and similar effects, all of which directly relate to historic properties. We also highly encourage FTA to ensure the agency sufficiently considers and incorporates the comments and concerns provided by other consulting parties as the project progresses. We would also like to encourage FTA prepare more frequent consultation with all consulting parties, due to the significant potential for effects and large number of consulting parties, in order ensure they are receiving equitable time and consideration to address their concerns and comments.

We appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4). These comments are based on the information available at the time of this review and on behalf of the SHPO pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw

Transportation Archaeologist

(360) 485-5014

dennis.wardlaw@dahp.wa.gov



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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

#### OUR PROPERTIES

#### GOOD SHEPHERD CENTER

Built: 1906 | Operated by Historic Seattle since 1975

### Mutual Life Building

Built: 1890-1916 | Operated by Historic Seattle since 1983

#### Belmont/Boylston Houses

Built: 1893-1903 | Operated by Historic Seattle since 1989

#### PHILLIPS HOUSE

Built: 1902 | Operated by Historic Seattle since 1992

#### VICTORIAN ROW

Built: 1891 | Operated by Historic Seattle since 1993

#### 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

Built: 1886 | Operated by Historic Seattle since 2021

#### 1117 Minor Avenue Seattle, WA 98101

(206) 622-6952 info@historicseattle.org www.historicseattle.org 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 5<sup>th</sup> Avenue alternatives (CID-2a and CID-2b) is chosen. We do not support the 5<sup>th</sup> 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 5<sup>th</sup> Avenue

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 5<sup>th</sup> Avenue alternatives is chosen, the district would also lose 418 5<sup>th</sup> 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 5<sup>th</sup> Avenue Station map.

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

Eugenia Wos

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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** 

**Preservation Programs Director** 

Huy Pham

# Attachment H: Historic and Archaeological Resources/Section 106

The DEIS does not sufficiently assess the construction and permanent visual, physical, and operational impacts of the WSBLE project on historic resources. A thorough understanding and analysis of these impacts (effects) is necessary to meaningfully compare alternatives, inform a decision on a Preferred Alternative, and avoid costly conflicts and limited mitigation opportunities. Successful Section 106 consultation depends on the City having this information to evaluate impacts and trade-offs.

As noted in *Attachment C: Compliance*, the DEIS demonstrates several instances where compliance with Seattle Municipal Code sections related to implementation of the City's Historic Preservation regulations are not identified. Specifically, the references to when a Certificate of Approval (SMC 25.12 and SMC 23.66) is required for alterations within historic districts (demolition, construction of stations, venting structures, head houses etc.) or to individual landmarks.

The DEIS does not adequately address regulations regarding referral to the Landmarks Preservation Board of nominations for potentially eligible resources that are proposed for demolition or substantial alteration (SMC 25.05.675H2c and SMC 25.12). Without this information, the potential conflict with local controls and policies cannot be determined. These issues should be resolved and documented in the FEIS to avoid potential cost and delay in the project permitting process.

Related to both local and federal regulatory compliance, the DEIS does not adequately assess or describe the impacts to historic resources. Several specific examples that are of concern are the visual impacts to Union Station caused by vent stacks, the construction impacts to areaways regarding haul and detour routes, and the construction and operational impacts to Seattle Center under DT-1 Seattle Center station alternative at Republican Street. Additionally, the DEIS does not define, identify, or address impacts to traditional cultural properties (TCPs).

The City is a Consulting Party under Section 106 of the National Historic Preservation Act (NHPA). In this role, we will work towards concurrence on the area of potential effect (APE), identify historic and archaeologic resources within the City that are adversely affected and work with Sound Transit and FTA to develop a Memorandums of Understanding if appropriate. The City has not yet concurred on the project APE. We understand that the APE can change throughout the process as the project evolves. However, it is important that the APE capture all areas that will be impacted both permanently and during construction. We have specific concerns regarding the APE in the CID, Pioneer Square, and Seattle Center.

**Next steps**. A comprehensive inventory of these issues may be found in the City's formal DEIS comments in *Attachment A: City Consolidated Comments*. In addition to written response to those comments, the City seeks the following:

 Continued meetings of consulting parties with Sound Transit and the FTA to discuss and seek agreement on Section 106 matters.

- Clarity in the FEIS for analysis of proposed physical alterations and the resulting impacts (effects)
  on historic resources. This includes existing city landmarks and historic district, potentially
  locally eligible resources, and properties that are National Register listed or determined eligible.
  The FEIS must identify actions that will require a Certificate of Approval.
- Identification of actions that will require a landmark nomination must be submitted to the Landmarks Preservation Board per SMC 25.12 and SMC 25.05.675H2C.
- Identification of TCPs and analysis of impacts to those resources should be included in the FEIS.
- Analysis of impacts to areaways, particularly within Pioneer Square. Areaways have been evaluated during previous public projects, but those are not referenced in the DEIS.
- FEIS must clearly provide analysis of impacts (effects) to historic resources along haul and detour routes.
- FEIS must clearly provide analysis of visual, construction and operational impacts (effects) to Seattle Center. Specifically, construction feasibility studies for the Northwest Rooms and Cornish Playhouse to address some of the proposed alterations or nearby construction will be needed. See *Attachment K* for additional information on Seattle Center.
- Specific mitigation options relating to specific impacts to historic resources. It appears that the menu of mitigation options suggested in the DEIS is general rather than specific.

ID	DEIS Chapter/Section	Page No.	Section No.	Comment Made by:	City Department	Comment (Limit to One Item Per Row)	Project Segment
68	Technical Report: Historic and Archaeological Resources	N.5A-17		Rebecca Ossa, SCL	SCL	3 (1 3 )	All (Systemwide)
69	Technical Report: Historic and Archaeological Resources	3-1, AE 0036-17		Rebecca Ossa, SCL	SCL	1	All (Systemwide)
70	Technical Report: Historic and Archaeological Resources	10-10, AE0036- 17		Rebecca Ossa, SCL	SCL	Re: "Common to all Build Alternatives in this segment is the relocation of a 230-kilovolt power line along 6th Avenue South and Diagonal Avenue, south of South Spokane Street, leading to the Seattle City Light Substation. This project element would not directly or indirectly alter or diminish any aspect of integrity of adjacent historic properties," has the transmission line been evaluated for NR eligibility?	All (Systemwide)
211	Historic and Archaeological Resources	4.2.16-23 & 4.3.16-48	4.2.16.5 & 4.3.16.5	Jerry Suder	SDCI	An inadvertent discovery plan should include additional measures to have archaeologist and/or cultural expert on site during ground disturbance where and when advised by State Historic Preservation Officer and Tribes.	All (Systemwide)
212	Historic and Archaeological Resources	4.2.16-23 & 4.3.16-48	4.2.16.5 & 4.3.16.5	Lindsay King	SDCI	References to local codes citing minimum mitigation requirements is missing. Operation and construction of the project would comply with national, state and local regulations at the time of permitting.	All (Systemwide)
213	Technical Report: Historic and Archaeological Resources		2.3, 11.2	Jerry Suder	SDCI	City of Seattle regulations require a Certificate of Approval for demolition of a City of Seattle Landmark or new construction in a historic district (SMC 25.12 & 23.66). Projects across the street or adjacent to any City landmark require consultation with Seattle Department of Neighborhoods for site-specific impact mitigation.	All (Systemwide)
214	Technical Report: Historic and Archaeological Resources		2.3	Lindsay King	SDCI	Paragraph 1: buildings proposed for demolition are to be referred to Department of Neighborhoods to identify structures eligible to meet landmark status per SMC 25.12. To streamline the demolition permit process this analysis should occur as part of the FEIS.	All (Systemwide)
215	Technical Report: Historic and Archaeological Resources		Table N5-A	Jerry Suder	SDCI	The information necessary to identify impacts and compare alternatives is missing. The project lacks an analysis of how many structures, eligible for City of Seattle landmark status, will be demolished with each alternative. Coordination is required with the Department of Neighborhoods who maintains a partial list of structures eligible for local nomination.	All (Systemwide)
568	Historic and Archaeological Resources	4.3.16-1	Figure 4.3.16-	Julia Levitt	Seattle Center	The analysis is incomplete. The Area of Potential Effect cuts through Seattle Center campus, which is a recreational public facility with historic and cultural significance. The APE boundary should be expanded to include the entire campus because the entire campus will be affected by the construction and long-term impacts in the APE.	Downtown
569	Historic and Archaeological Resources	4.3.16-9	Table	Julia Levitt	Seattle Center	The analysis is incomplete. The historical and archaeological resources study does not consider the Mercer Garage or Memorial Stadium as part of the affected resources. FEIS must consider potential impacts to these structures from ground borne noise/vibration both during construction and permanently. Construction or permanent noise/vibration impacts above sustainable thresholds would threaten the financial sustainability and long-term viability of the Playhouse and the Phelps Center because of their uses as performance venues. SEE EXHIBIT SC-3 FOR THRESHOLDS	Downtown
570	Historic and Archaeological Resources	4.3.16-27	Table	Julia Levitt	Seattle Center	The analysis does not capture complete impacts of the project to the Century 21 Playhouse. Figure 4-4 of Appendix H shows a construction footprint that extends into vacated 2nd Ave N. for the length of the Playhouse. Construction and excavation in this area could cause significant adverse impacts to the historic structure both above- and below-grade; and the station could cause both construction and permanent noise and aesthetic impacts to the Playhouse and its tenant, Cornish College of the Arts. Please update this table with accurate impacts to the Playhouse for the FEIS.	Downtown
571	Historic and Archaeological Resources	4.3.16-30	Table	Julia Levitt	Seattle Center	International Commerce and Industry Building, Sweden Pavilion and Key Arena are now known by other names: Northwest Rooms (KEXP, SIFF, Vera Project); International Fountain Pavilion; and Climate Pledge Arena, respectively. These commonly used names must be noted in the document so that members of the public can easily find the analysis.	Downtown
709	Technical Report: Historic and Archaeological Resources	2.2- 2.3	2.3	Sarah Sodt	DON	References to local codes are missing related to implementation of the City's Historic Preservation regulations - specifically the references to when a Certificate of Approval (SMC 25.12 and SMC 23.66) is required for alterations within historic districts (demolition, construction of stations, venting structures, head houses etc.) or to individual landmarks. Additionally the regulations regarding referral to the Landmarks Preservation Board of nominations for potentially eligible resources that are proposed for demolition or substantial alteration is not address (SMC 25.05.675H2c and SMC 25.12). Therefore, the potential conflict with local controls cannot be determined.	All (Systemwide)
710	Historic and Archaeological Resources	232	Table 4.3.16-5	Erin Doherty	DON	Seattle Center's International Commerce & Industry Building (Northwest Rooms) ID 1396a is identified as "adversely affected" both during construction and permanently due to proximity of DT-1 "Preferred Alternative". The remainder of this Seattle Landmark includes the International Plaza (Northwest Rooms Plaza) ID 1396c, and the Sweden Pavilion (International Fountain Pavilion) ID 1396d. These resources should be collectively identified as "adversely affected".	Downtown
711	Historic and Archaeological Resources	232	Table 4.3.16-5	Erin Doherty	DON	Portions of the Key Arena (Climate Pledge Arena) ID 1396b structure and program reside beneath or directly adjacent to the International Plaza (Northwest Rooms Plaza) ID 1396c which may be adversely impacted by DT-1 "Preferred Alternative" and should be analyzed further.	Downtown

Historic and Archaeological	205	Table 4 2 16 1	Frin Doborty	DON	Identifies the number of designated Seattle Landmarks within the Ballard APE, but does not illustrate how many are impacted by	All (Systemwide)
Resources	203	Table 4.3.10-1	Lilli Doneity	DON	done for Seattle Landmarks related to both the Ballard and West Seattle APEs, by segment.	
Technical Report: Historic and Archaeological Resources	37	2.3	Erin Doherty	DON	missing a reference to the SEPA referral process for individual buildings per SMC 25.05.800, Tables A & B for Footnote (1) for 25.05.800.B.6 and 25.05.800.B.7.	All (Systemwide)
Technical Report: Historic and Archaeological Resources		3.2	Erin Doherty	DON		Downtown
Technical Report: Historic and Archaeological Resources		5.1	Erin Doherty	DON	Additional records should include King County property records / title searches.	All (Systemwide)
Technical Report: Historic and Archaeological Resources	53	5.2.2	Erin Doherty	DON	Note that building dates on King County Tax records may not be accurate and need to be verified through additional sources.	All (Systemwide)
Technical Report: Historic and Archaeological Resources	146	9.9	Erin Doherty	DON	Paramount Theatre should be identified as a City of Seattle Landmark.	Downtown
Technical Report: Historic and Archaeological Resources	228	10.5.2.4	Erin Doherty	DON	This section notes the proposed removal of the "north façade canopy" for the International Commerce & Industry Building (Northwest Rooms) ID 1396a. Provide clarification of the "canopy". This building has a character defining, 4' deep roof overhang on all sides of the building, that is not a canopy. It appears to be comprised of the extended top chord of each roof truss, which supports the building's roof deck. If this what is being described as a canopy, revise to reflect removal of roof overhang and alteration of roof trusses. Provide a description of the other proposed alterations to building systems/utilities, circulation, etc. on the north side of the building, both short and long term as a result of DT-1 "Preferred Alternative".	Downtown
Technical Report: Historic and Archaeological Resources	228	10.5.2.4	Erin Doherty	DON	The identification of potential adverse effects on the Seattle Center's International Commerce & Industry Building (Northwest Rooms) ID 1396a / International Plaza (Northwest Rooms Plaza) ID 1396c / Sweden Pavilion (International Fountain Pavilion) ID 1396d as a result of DT-1 "Preferred Alternative" is incomplete. Missing information includes construction methods for open cut directly adjacent to and beneath this Seattle Landmark with direct physical/proximity impacts, and additional potential adverse structural impacts due to vibration, settlement and water table (as demonstrated by recent Arena expansion project), both in the short and long term. As shown in the drawings, the immediate adjacency of the multi-storied open cut will impact the structural foundation of the building. There is no description of the methodology to protect and support the Seattle Landmark during construction, even though the proposed station would be less than 3' from the building face. Provide a construction feasibility study so that the actual effects can be assessed.	Downtown
Technical Report: Historic and Archaeological Resources	261	11	Erin Doherty	DON	Due to the cumulative impacts on this Seattle Landmark, identify measures to avoid adverse effects on the Seattle Center International Commerce & Industry Building (Northwest Rooms) ID 1396a, International Plaza (Northwest Rooms Plaza) ID 1396c, and the Sweden Pavilion (International Fountain Pavilion) ID 1396d.	Downtown
Historic and Archaeological Resources	229	Table 4.3.16-5	Erin Doherty	DON	Seattle Center's Historic Playhouse ID 359a may be adversely impacted by DT-1 "Preferred Alternative" and should be analyzed	Downtown
	228	Section 10.5.2.4	Erin Doherty	DON	ů i i	Downtown
Archaeological Passurace	Attachment	Table N.5A.1	Erin Doherty	DON	The International Fountain is not a Seattle Landmark. The International Fountain Pavilion is a Seattle Landmark, and you are referring to this resource as the Sweden Pavilion.	Downtown
Historic and Archaeological Resources	10	4.1.16	Genna Nashem	DON	two historic district - The Pioneer Square Preservation District and the International District Special Review District. It doesn't	All (Systemwide)
Historic and Archaeological Resources	4.2.16.1	4.2.16.1	Genna Nashem	DON	APE should include the King Street Station. The proposed 4th Ave Station is directly across the tracks of King Street Station; bike facilities that would serve the ST station are proposed behind the station and the use of the plaza at King Street station could be affected by the presence, noise and smell of the ventilation shaft.	SODO/CID
		2.3	Genna Nashem	DON	Include City Historic Districts -Pioneer Square Preservation District and International Special Review District and regulation SMC 23.66	SODO/CID
	10-69/242	10.5.2.5	Sarah Sodt	DON	Regarding the Cape Flattery Apartments the impact of having a vacant building during the duration of the construction should be analyzed. A long-term vacancy can potentially directly cause the owner to pursue demolition of the building and redevelopment.	Interbay-Ballard
	Technical Report: Historic and Archaeological Resources  Historic and Archaeological Resources  Historic and Archaeological Resources  Technical Report: Historic and Archaeological Resources  Historic and Archaeological Resources  Technical Report: Historic and Archaeological Resources	Resources  Technical Report: Historic and Archaeological Resources	Resources  Technical Report: Historic and Archaeological Resources	Resources 200 lable 4.3.16-1 Erin Doherty Technical Report: Historic and Archaeological Resources 37 2.3 Erin Doherty Technical Report: Historic and Archaeological Resources 5.1 Erin Doherty Technical Report: Historic and Archaeological Resources 5.1 Erin Doherty Technical Report: Historic and Archaeological Resources 5.1 Erin Doherty Technical Report: Historic and Archaeological Resources 6.3 Erin Doherty Technical Report: Historic and Archaeological Resources 7.28 Indicate the page of the pa	Resources 203 l'able 4.3.16-1 Erin Doherty DON Technical Report: Historic and Archaeological Resources 37 2.3 Erin Doherty DON Technical Report: Historic and Archaeological Resources 5.1 Erin Doherty DON Technical Report: Historic and Archaeological Resources 5.1 Erin Doherty DON Technical Report: Historic and Archaeological Resources 5.3 5.2.2 Erin Doherty DON Technical Report: Historic and Archaeological Resources 6.3 5.2.2 Erin Doherty DON Technical Report: Historic and Archaeological Resources 7.3 5.2.2 Erin Doherty DON Technical Report: Historic and Archaeological Resources 7.4 Erin Doherty DON Technical Report: Historic and Archaeological Resources 7.4 Erin Doherty DON Technical Report: Historic and Archaeological Resources 7.4 Erin Doherty DON Technical Report: Historic and Archaeological Resources 7.4 Erin Doherty DON Technical Report: Historic and Archaeological Resources 7.4 Erin Doherty DON Technical Report: Historic and Archaeological Resources 7.4 Erin Doherty DON Technical Report: Historic and Archaeological Resources 7.4 Erin Doherty DON Technical Report: Historic and Archaeological Resources 7.4 Erin Doherty DON Historic and Archaeological Resources 7.5 Erin Doherty DON Historic and Archaeological Resources 8.5 Erin Doherty DON Historic and Archaeological Resources 8.5 Erin Doherty DON Technical Report: Historic and Archaeological Resources 8.5 Erin Doherty DON Historic and Archaeological Resources 9.5 Erin Doherty DON Technical Report: Historic and Archaeological Resources 9.5 Erin Doherty DON Technical Report: Historic and Archaeological Resources 9.5 Erin Doherty DON Technical Report: Historic and Archaeological Resources 9.5 Erin Doherty DON Technical Report: Historic and Archaeological Resources 9.5 Erin Doherty DON Technical Report: Historic and Archaeological Resources 9.5 Erin Doherty DON	Technical Report: Historic and Archaeological Resources  20

## Yellin, Michelle

From: Stevenson, Alex <alex.stevenson@soundtransit.org>

**Sent:** Monday, May 22, 2023 1:33 PM **To:** Gray, Connie; Yellin, Michelle

Cc: Swank, Alisa

**Subject:** [EXTERNAL] FW: West Seattle and Ballard Link Extensions Section 106 Consulting

Parties Draft EIS Briefing

FYI

Alex E. Stevenson

Manager - Cultural Resources Sound Transit Mobile: 206-419-5315

Pronouns: He/Him/His

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From: Eugenia Woo <eugeniaw@historicseattle.org>

**Sent:** Tuesday, May 9, 2023 4:28 PM

To: Assam, Mark (FTA) <mark.assam@dot.gov>

Cc: Stevenson, Alex <alex.stevenson@soundtransit.org>

Subject: Re: West Seattle and Ballard Link Extensions Section 106 Consulting Parties Draft EIS Briefing

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Hello Mark,

Thank you for your response. We look forward to continuing participating in the Section 106 process.

Best, Eugenia

Eugenia Woo

**Director of Preservation Services** 

Historic Seattle

1117 Minor Ave | Seattle, WA 98101

t: 206.622.6952 ext 245



From: Assam, Mark (FTA) < Mark. Assam@dot.gov >

Sent: Thursday, April 27, 2023 6:22 PM

To: Eugenia Woo < eugeniaw@historicseattle.org >

Cc: Stevenson, Alex <alex.stevenson@soundtransit.org>; Wardlaw, Dennis <<u>Dennis.Wardlaw@dahp.wa.gov</u>>; Lyste,

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<maggiek@loghousemuseum.org>

Subject: RE: West Seattle and Ballard Link Extensions Section 106 Consulting Parties Draft EIS Briefing

Dear Ms. Woo,

Thank you for your message below regarding the West Seattle and Ballard Link Extensions (WSBLE) Project. As you may know, in June 2022, the Sound Transit Board of Directors (Board) identified the preferred alternative for the West Seattle Link Extension component of the WSBLE Project, and requested further studies on the Ballad Link Extension component (see Board motion <a href="here">here</a>). In March 2023, after the further studies period concluded, the Board identified the preferred alternative for the Ballard Link Extension component of the WSBLE Project (see Board motion and press release <a href="here">here</a> and <a href="here">here</a>, respectively).

Over the past several months, Sound Transit staff focus on activities related to the further studies requested by the Board has resulted in delays to the overall environmental review of the WSBLE Project, including the Section 106 process. Now that these further studies activities have been completed, and along with the Board action last month, FTA and Sound Transit anticipate resuming forward progress on the environmental review for the Project in the near future. This will include a resumption of Section 106 consultation activities for the Project with the State Historic Preservation Officer, Tribes, and Consulting Parties.

Finally, it should be noted that identification of a preferred alternative by the Board is not a final decision on the WSBLE Project. The final decision on the Project will not occur until after publication of a Final Environmental Impact Statement.

If you have other questions or concerns about the WSBLE Project, please do not hesitate to reach out to me. Thank you for your consultation on the Project.

Sincerely,

Mark A. Assam, AICP

Environmental Protection Specialist
U.S. Department of Transportation
Federal Transit Administration | Office of Environmental Programs
915 2nd Avenue, Suite 3192 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Eugenia Woo < <a href="mailto:eugeniaw@historicseattle.org">eugeniaw@historicseattle.org</a>>

**Sent:** Thursday, April 13, 2023 11:57 AM

To: Stevenson, Alex <alex.stevenson@soundtransit.org>; Wardlaw, Dennis <Dennis.Wardlaw@dahp.wa.gov>; Lyste, Kerry <KLyste@stillaguamish.com>; Mullen-Moses, Steven <Steve@snoqualmietribe.us>; Murphy, Laura <alex.murphy@muckleshoot.nsn.us>; Valdez, Kate <a href="kate@yakama.com">kate@yakama.com</a>; Young, Richard <a href="ryoung@tulaliptribes-nsn.gov">ryoung@tulaliptribes-nsn.gov</a>; Lewarch, Dennis <a href="delwarch@suquamish.nsn.us">delwarch@suquamish.nsn.us</a>; Lisa Howard <a href="lisa@pioneersquare.org">lisa@pioneersquare.org</a>; iessa@pioneersquare.org; nikki@pioneersquare.org; Sarah.Sodt@seattle.gov; Kji Kelly <a href="kjik@historicseattle.org">kjik@historicseattle.org</a>; kathleen@historicsouthdowntown.org; marykate@historicsouthdowntown.org; Jennifer.Meisner@kingcounty.gov; Todd.Scott@kingcounty.gov; rsmith@martinsmith.com; Julia.Levitt@seattle.gov; Jaredj@scidpda.org; cmoore@preservewa.org; huy@preservewa.org; dlum@interimcda.org; director@loghousemuseum.org; Brooks, Allyson <a href="Allyson.Brooks@DAHP.WA.GOV">Allyson.Brooks@DAHP.WA.GOV</a>; 'Vann, Nicholas (DAHP)' <a href="nicholas.vann@dahp.wa.gov">nicholas.vann@dahp.wa.gov</a>> Cc: Assam, Mark (FTA) <a href="mark.Assam@dot.gov">Mark.Assam@dot.gov</a>; Remington, Barney (FTA) <a href="mark.barney.remington@dot.gov">barney.remington@dot.gov</a>; Gamza, Thomas (FTA) <a href="mark.homas.gamza@dot.gov">homas.gamza@dot.gov</a>; Costanza, Ann <a href="mark.acostanza@anchorqea.com">acostanza@anchorqea.com</a>; Barbara Bundy (bbundy@anchorqea.com) <a href="mark.bundy@anchorqea.com">bbundy@anchorqea.com</a>; Swift, Lauren <a href="mark.auren.swift@soundtransit.org">hauren.swift@soundtransit.org</a>; Lair, Alexis <a href="mark.sullair@soundtransit.org">alexis.lair@soundtransit.org</a>; Chahim, Leda <a href="mark.sullair@soundtransit.org">heda.chahim@soundtransit.org</a>; maggiek@loghousemuseum.org Subject: Re: West Seattle and Ballard Link Extensions Section 106 Consulting Parties Draft EIS Briefing

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Alex,

I am writing on behalf of Historic Seattle. We are a consulting party to Section 106 for the WSBLE project.

Can you provide an update to the Section 106 process for this project? Perhaps I missed some communications since April 2022, the last time I believe the consulting parties met (one year ago).

Historic Seattle submitted DEIS comments last year and have been following the project on our own. The Sound Transit Board seems to be close to making a decision on the preferred routes. There is controversy over the C-ID station(s) and new stations (North-South) are now proposed that were not part of the DEIS. The National Register-eligible (criteria A and C) King County Administration Building may be impacted depending on which route is chosen.

We look forward to getting an update and learning how consulting parties can be more active in participating in this process BEFORE decisions are made or close to being made.

I removed Holly Borth from this email because she is no longer at DAHP and included Dr. Allyson Brooks and Nicholas Vann in this message.

If I missed some correspondence about this, please let me know.

Thank you.

Eugenia

# Eugenia Woo

Director of Preservation Services

Historic Seattle

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t: 206.622.6952 ext 245

eugeniaw@historicseattle.org | www.historicseattle.org



From: Stevenson, Alex <alex.stevenson@soundtransit.org>

Sent: Thursday, March 31, 2022 2:53 PM

To: Wardlaw, Dennis <a href="Dennis.Wardlaw@dahp.wa.gov">Dennis.Wardlaw@dahp.wa.gov">Dennis.Wardlaw@dahp.wa.gov</a>; Borth, Holly <a href="Holly.Borth@dahp.wa.gov">Holly.Borth@dahp.wa.gov</a>; Lyste, Kerry <a href="KLyste@stillaguamish.com">KLyste@stillaguamish.com</a>; Mullen-Moses, Steven <a href="Steve@snoqualmietribe.us">Steve@snoqualmietribe.us</a>; Murphy, Laura <a href="Laura.murphy@muckleshoot.nsn.us">Dennis vallewarch@suquamish.nsn.us</a>; Valdez, Kate <a href="Kate@yakama.com">Kate@yakama.com</a>; Young, Richard <a href="reyoung@tulaliptribes-nsn.gov">Poung@tulaliptribes-nsn.gov</a>; Lewarch, Dennis <a href="delwarch@suquamish.nsn.us">delwarch@suquamish.nsn.us</a>; Lisa Howard <a href="Isa@pioneersquare.org">Isa@pioneersquare.org</a>; ilsa@pioneersquare.org</a>; <a href="micki@pioneersquare.org">Isa@pioneersquare.org</a>; <a href="micki@pioneersquare.org">Isa@pioneersquare.org</a>; <a href="micki@pioneersquare.org">Isa@pioneersquare.org</a>; <a href="micki@pioneersquare.org">Kugenia Woo</a></a></a><a href="micki@pioneersquare.org">Sugenia Woo</a><a href="micki@pioneersquare.org">Sugenia W

Cc: Assam, Mark (FTA) < mark.assam@dot.gov >; Remington, Barney (FTA) < barney.remington@dot.gov >; Gamza, Thomas (FTA) < thomas.gamza@dot.gov >; Costanza, Ann < acostanza@anchorqea.com >; Barbara Bundy (bbundy@anchorqea.com) < bundy@anchorqea.com >; Swift, Lauren < lauren.swift@soundtransit.org >; Lair, Alexis < alexis.lair@soundtransit.org >; Chahim, Leda < leda.chahim@soundtransit.org >; maggiek@loghousemuseum.org < maggiek@loghousemuseum.org >

Subject: RE: West Seattle and Ballard Link Extensions Section 106 Consulting Parties Draft EIS Briefing

Hello again everyone -

Some folks, but apparently not everyone, have apparently had issues with the agenda I attached to the invitation for this meeting. Here is the agenda if you didn't receive it or can't access it on the invite.

### Alex

Alex E. Stevenson

Cultural Resources Program Manager Sound Transit

Desk: 206-553-3655 Mobile: 206-419-5315

Pronouns: He/Him/His

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-----Original Appointment-----

From: Stevenson, Alex

**Sent:** Thursday, March 31, 2022 2:28 PM

To: Stevenson, Alex; Wardlaw, Dennis; Borth, Holly; Lyste, Kerry; Steven Moses; laura.murphy@muckleshoot.nsn.us; Valdez, Kate; Young, Richard; Lewarch, Dennis; Lisa Howard; jessa@pioneersquare.org; nikki@pioneersquare.org; Sarah.Sodt@seattle.gov; kjik@historicseattle.org; eugeniaw@historicseattle.org; kathleen@historicsouthdowntown.org; marykate@historicsouthdowntown.org; Jennifer.Meisner@kingcounty.gov; Todd.Scott@kingcounty.gov; rsmith@martinsmith.com; Julia.Levitt@seattle.gov; Jaredj@scidpda.org;

cmoore@preservewa.org; huy@preservewa.org; dlum@interimcda.org; director@loghousemuseum.org

Cc: Assam, Mark (FTA); Remington, Barney (FTA); Gamza, Thomas (FTA); Costanza, Ann; Barbara Bundy; Swift, Lauren; Lair, Alexis; Chahim, Leda; maggiek@loghousemuseum.org

Subject: West Seattle and Ballard Link Extensions Section 106 Consulting Parties Draft EIS Briefing

When: Tuesday, April 5, 2022 11:00 AM-12:00 PM (UTC-08:00) Pacific Time (US & Canada).

Where: Microsoft Teams Meeting

Good afternoon -

The Federal Transit Administration (FTA) and Sound Transit invite you to attend the West Seattle and Ballard Link Extensions (WSBLE) Section 106 Additional Consulting Parties Draft Environmental Impact Statement Briefing. In this meeting we will:

- Provide an overview of West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (DEIS)
- Review historic property documentation in the DEIS:

Methods for National Register of Historic Places Eligibility Determinations Methods for Section 106 Effects Determinations

The meeting agenda is attached to this invite and a meeting summary will be distributed for those who are not able to attend. I apologize for the delay getting this invitation out to you.

220-4465 or Alex Stevenson (Sound Transit) at <a href="mailto:alex.stevenson@soundtransit.org">alex.stevenson@soundtransit.org</a> or 206-419-5315.
Thank you!
Microsoft Teams meeting
Wheresoft reallis infeeting

If you have any questions in advance of the meeting please contact Mark Assam (FTA) at <a href="mark.assam@dot.gov">mark.assam@dot.gov</a> or 206-



July 10, 2023 Sent via email

The Honorable Jaison Elkins Muckleshoot Indian Tribe 39015 172nd Avenue Southeast Auburn, WA 98092

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Chairman Elkins.

The purpose of this letter is to update the Muckleshoot Indian Tribe regarding the National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) process for Sound Transit's West Seattle Link Extension and Ballard Link Extension projects. These projects will expand Link light rail transit service from West Seattle to SODO and from Downtown Seattle to Ballard.

After completing a Draft Environmental Impact Statement that evaluated the combined West Seattle and Ballard Link extension projects, Sound Transit, in consultation with the Federal Transit Administration (FTA), determined that the environmental review process for the two extensions should continue separately. The two projects have different opening dates, and they will ultimately function as separate lines, with the West Seattle Link Extension connecting to Everett and the Ballard Link Extension connecting to Tacoma. The two projects are also now on different schedules for completion of environmental review.

The decision to separate the environmental review processes for these extensions was not made lightly, and it follows consideration of all the feedback received to date from Consulting Tribes, agencies, and the public. The information below summarizes the environmental process to date, explains the decision to separate the environmental review for the West Seattle Link Extension and the Ballard Link Extension projects moving forward, and describes anticipated next steps.

# Project Background and Environmental Review Process to Date

The West Seattle Link Extension (WSLE) and Ballard Link Extension (BLE) projects are elements of the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The WSLE would be about 4.7 miles long and would include stations at SODO, Delridge, Avalon, and Alaska Junction. The BLE would be about 7.1 miles long and would include a new 3.3-mile light rail-only tunnel in Downtown Seattle. Stations for the BLE would serve Chinatown-International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

The WSLE is scheduled to begin service along the full line in 2032. The BLE is scheduled to begin service in 2039.

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Julie E. Timm

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- March 2023: Sound Transit Board identified Preferred Alternative for BLE.

# **Separating the Project Environmental Reviews**

As described in the Draft EIS, the WSLE and the BLE would operate as separate lines in the light rail system. The Draft EIS evaluated both extensions together, because of their location, schedule, and review efficiencies for partner agencies as described above.

Because the NEPA process for the two extensions began with one NOI in the Federal Register, FTA considered the appropriate steps under NEPA for continuing the process separately for the two extensions. FTA has determined that to separate the environmental review for the WSLE and BLE projects, the existing NOI published in the Federal Register in February 2019 can only continue to pertain to one extension, and the other extension will initiate a separate NEPA action under a new NOI.

The WSLE is more advanced, with preliminary engineering of the preferred alternative underway, therefore, FTA and Sound Transit will proceed with the WSLE under the existing NOI, redefining the project to remove the BLE portions. As described in the Draft EIS, the WSLE will consist of about 4.7 miles of new light rail line, including stations at SODO, Delridge, Avalon, and Alaska Junction. Sound Transit and FTA will proceed with the preparation and publication of a Final EIS for the WSLE, which is anticipated to be completed in 2024. The Final EIS will include responses to comments received on the West Seattle and Ballard Link Extensions Draft EIS that are related to the West Seattle Link Extension or are corridor-wide comments.

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Other federal programs that typically fall under the NEPA umbrella for evaluation -- such as Section 106 of the National Historic Preservation Act and the Endangered Species Act -- will also be divided and defined separately for the two extensions.

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The following generally describes the anticipated next steps for the two light rail extensions. More detail will be provided as FTA and Sound Transit continues Tribal consultation and agency coordination for both extensions.

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<u>BLE</u>: FTA and Sound Transit will issue a new NOI and prepare a separate Draft EIS focused on the BLE. That Draft EIS will carry forward the BLE analysis from the West Seattle and Ballard Link Extensions Draft EIS. The BLE alternatives will be updated as appropriate, including analysis of the preferred alternative as well as other refinements/alternatives identified by the Sound Transit Board in March 2023. FTA and Sound Transit will continue to engage with Tribes and agencies and will provide for public engagement consistent with NEPA and SEPA requirements. FTA will initiate Government-to-Government consultation and Section 106 consultation for the BLE project.

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FTA and Sound Transit look forward to continuing our coordination and consultation for both projects as they move forward through the NEPA/SEPA processes. If you have any questions about the projects or the revised approach to environmental review, please contact Lauren Swift, Central Corridor Environmental Manager, at <a href="mailto:lauren.swift@soundtransit.org">lauren.swift@soundtransit.org</a> or 206/398-5301, or Mark Assam, Environmental Protection Specialist, at <a href="mark.assam@dot.gov">mark.assam@dot.gov</a> or 206/220-4465.

Sincerely.

Sincerely,

Cathal Ridge
Cathal Ridge, Executive Corridor Director

Dezerae Hayes Ph.D., Director of Tribal Relations

cc: Sean Daniels, Public and Business Affairs, Muckleshoot Indian Tribe

Glen St. Amant, Natural Resources, Muckleshoot Indian Tribe

Martin Fox, Natural Resources, Muckleshoot Indian Tribe

Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe

Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Leda Chahim, Government & Community Relations Manager Central Corridor, Sound Transit

Kent Hale, Director-Environmental Planning, Sound Transit

Mark Assam, Environmental Protection Specialist, FTA



July 10, 2023 Sent via email

The Honorable Eric White Stillaguamish Tribe of Indians of Washington **PO Box 277** Arlington, WA 98223-0277

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Chairman White.

The purpose of this letter is to update the Stillaguamish Tribe of Indians regarding the National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) process for Sound Transit's West Seattle Link Extension and Ballard Link Extension projects. These projects will expand Link light rail transit service from West Seattle to SODO and from Downtown Seattle to Ballard.

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Cathal Ridge, Executive Corridor Director

(1) MAINE

Dezerae Hayes Ph.D., Director of Tribal Relations

cc: Sara Thitipraseth, Director of Stillaguamish Natural Resources Department, Stillaguamish Tribe of Indians of Washington

Kerry Lyste, Cultural Resources, Stillaguamish Tribe of Indians of Washington Lauren Swift, Central Corridor Environmental Manager, Sound Transit Leda Chahim, Government & Community Relations Manager Central Corridor, Sound Transit Kent Hale, Director-Environmental Planning, Sound Transit Mark Assam, Environmental Protection Specialist, FTA



July 10, 2023 Sent via email

The Honorable Leonard Forsman Suguamish Indian Tribe of the Port Madison Reservation PO Box 498 Suguamish, WA 98392-0498

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Chairman Forsman.

The purpose of this letter is to update the Suquamish Indian Tribe regarding the National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) process for Sound Transit's West Seattle Link Extension and Ballard Link Extension projects. These projects will expand Link light rail transit service from West Seattle to SODO and from Downtown Seattle to Ballard.

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Sincerely.

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Cathal Ridge
Cathal Ridge, Executive Corridor Director

Dezerae Hayes Ph.D., Director of Tribal Relations

cc: Alison O'Sullivan, Natural Resources, Suquamish Indian Tribe of the Port Madison Reservation Dennis Lewarch, Cultural Resources, Suquamish Indian Tribe of the Port Madison Reservation Lauren Swift, Central Corridor Environmental Manager, Sound Transit Leda Chahim, Government & Community Relations Manager Central Corridor, Sound Transit Kent Hale, Director-Environmental Planning, Sound Transit Mark Assam, Environmental Protection Specialist, FTA



July 10, 2023 Sent via email

The Honorable Teri Gobin Tulalip Tribe of Washington 6406 Marine Drive Northwest Tulalip, WA 98271

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Chairwoman Gobin,

The purpose of this letter is to update the Tulalip Tribe of Indians regarding the National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) process for Sound Transit's West Seattle Link Extension and Ballard Link Extension projects. These projects will expand Link light rail transit service from West Seattle to SODO and from Downtown Seattle to Ballard.

After completing a Draft Environmental Impact Statement that evaluated the combined West Seattle and Ballard Link extension projects, Sound Transit, in consultation with the Federal Transit Administration (FTA), determined that the environmental review process for the two extensions should continue separately. The two projects have different opening dates, and they will ultimately function as separate lines, with the West Seattle Link Extension connecting to Everett and the Ballard Link Extension connecting to Tacoma. The two projects are also now on different schedules for completion of environmental review.

The decision to separate the environmental review processes for these extensions was not made lightly, and it follows consideration of all the feedback received to date from Consulting Tribes, agencies, and the public. The information below summarizes the environmental process to date, explains the decision to separate the environmental review for the West Seattle Link Extension and the Ballard Link Extension projects moving forward, and describes anticipated next steps.

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The West Seattle Link Extension (WSLE) and Ballard Link Extension (BLE) projects are elements of the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The WSLE would be about 4.7 miles long and would include stations at SODO, Delridge, Avalon, and Alaska Junction. The BLE would be about 7.1 miles long and would include a new 3.3-mile light rail-only tunnel in Downtown Seattle. Stations for the BLE would serve Chinatown-International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

The WSLE is scheduled to begin service along the full line in 2032. The BLE is scheduled to begin service in 2039.

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Julie E. Timm

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Because the NEPA process for the two extensions began with one NOI in the Federal Register, FTA considered the appropriate steps under NEPA for continuing the process separately for the two extensions. FTA has determined that to separate the environmental review for the WSLE and BLE projects, the existing NOI published in the Federal Register in February 2019 can only continue to pertain to one extension, and the other extension will initiate a separate NEPA action under a new NOI.

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July 10, 2023 Sent via email

The Honrable Gerald Lewis Confederated Tribes and Bands of the Yakama Nation PO BOX 151 Toppenish, WA 98948

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Chairman Lewis,

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July 10, 2023 Sent via email

The Honorable Cecile A. Hansen Duwamish Tribe 4705 West Marginal Way SW Seattle, WA 98106

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Chairwoman Hansen,

The purpose of this letter is to update the Duwamish Tribe regarding the National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) process for Sound Transit's West Seattle Link Extension and Ballard Link Extension projects. These projects will expand Link light rail transit service from West Seattle to SODO and from Downtown Seattle to Ballard.

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Sincerely,

Cathal Ridge

Cathal Ridge, Executive Corridor Director

Sincerely,

Dezerae Hayes Ph.D., Director of Tribal Relations

cc: Lauren Swift, Central Corridor Environmental Manager, Sound Transit Leda Chahim, Government & Community Relations Manager Central Corridor, Sound Transit Kent Hale, Director-Environmental Planning, Sound Transit Mark Assam, Environmental Protection Specialist, FTA



July 10, 2023 Sent via email

The Honorable Michael didahalqid Evans **Snohomish Tribe** PO Box 267 Edmonds, WA 98020

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Chairman Evans.

The purpose of this letter is to update agency partners on the National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) process for Sound Transit's West Seattle Link Extension and Ballard Link Extension projects. These projects will expand Link light rail transit service from West Seattle to SODO and from Downtown Seattle to Ballard.

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The decision to separate the environmental review processes for these extensions was not made lightly, and it follows consideration of all the feedback received to date from the Consulting Tribes, agencies, and public. The information below summarizes the environmental process to date, explains the decision to separate the environmental review for the West Seattle Link Extension and the Ballard Link Extension projects moving forward, and describes anticipated next steps.

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The WSLE is scheduled to begin service along the full line in 2032. The BLE is scheduled to begin service in 2039.

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### Kristina Walker

Tacoma Deputy Mayor

# **CHIEF EXECUTIVE OFFICER**

Julie E. Timm

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July 10, 2023 Sent via email

Kji Kelly Executive Director Historic Seattle 1117 Minor Avenue Seattle, WA 98101

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Kji,

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cc: Eugenia Woo, Director of Preservation Services, Historic Seattle
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Alex Stevenson, Manager-Cultural Resources, Sound Transit
Kent Hale, Director-Environmental Planning, Sound Transit
Mark Assam, Environmental Protection Specialist, FTA



Lisa Howard Executive Director Alliance for Pioneer Square PO Box 4507 Seattle, WA 98194

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Lisa,

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cc: Jessa Timmer, Deputy Director, Alliance for Pioneer Square Nikki Somers, Office Manager, Alliance for Pioneer Square Lauren Swift, Central Corridor Environmental Manager, Sound Transit Leda Chahim, Government & Community Relations Manager Central Corridor, Sound Transit Alex Stevenson, Manager-Cultural Resources, Sound Transit Kent Hale, Director-Environmental Planning, Sound Transit Mark Assam, Environmental Protection Specialist, FTA



Sarah Sodt City Historic Preservation Officer PO Box 94649 Seattle, WA 98124-4649

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Sarah,

The purpose of this letter is to update agency partners on the National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) process for Sound Transit's West Seattle Link Extension and Ballard Link Extension projects. These projects will expand Link light rail transit service from West Seattle to SODO and from Downtown Seattle to Ballard.

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# **Separating the Project Environmental Reviews**

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Because the NEPA process for the two extensions began with one NOI in the Federal Register, FTA considered the appropriate steps under NEPA for continuing the process separately for the two extensions. FTA has determined that to separate the environmental review for the WSLE and BLE projects, the existing NOI published in the Federal Register in February 2019 can only continue to pertain to one extension, and the other extension will initiate a separate NEPA action under a new NOI.

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Cathal Ridge
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cc: Lauren Swift, Central Corridor Environmental Manager, Sound Transit
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Kathleen Barry Johnson
Executive Director
Historic South Downtown Community Preservation and Development Authority
409b Maynard Ave S
Seattle, Wa 98104

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Cathal Ridge

Cathal Ridge, Executive Corridor Director

cc: MaryKate Ryan, Community Preservation Associate, Historic South Downtown Community Preservation and Development Authority

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Derek Lum Policy Analyst InterimCDA P.O. Box 3363 Seattle, WA 98114

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

# Dear Derek,

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Jennifer Meisner Historic Preservation Officer King County Historic Preservation Program 2913 Franklin Avenue E. Suite A Seattle, WA 98102

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

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Sincerely,

Cathal Ridge
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cc: Todd Scott, Preservation Architect/Planner, King County Historic Preservation Program
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Alex Stevenson, Manager-Cultural Resources, Sound Transit
Kent Hale, Director-Environmental Planning, Sound Transit
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Ryan Smith Chairman Martin Smith Inc. 316 Occidental Avenue South Suite 300 Seattle, WA 98104

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Ryan,

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Kent Hale, Director-Environmental Planning, Sound Transit
Mark Assam, Environmental Protection Specialist, FTA



Jared Johnson
Co-Executive Director
Seattle Chinatown International District Preservation and Development Authority
PO Box 3302
Seattle, WA 98114

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

## Dear Jared,

The purpose of this letter is to update agency partners on the National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) process for Sound Transit's West Seattle Link Extension and Ballard Link Extension projects. These projects will expand Link light rail transit service from West Seattle to SODO and from Downtown Seattle to Ballard.

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Michael King Director Southwest Seattle Historical Society 3003 61 Ave. SW Seattle, WA 98116

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Michael,

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Chris Moore
Executive Director
Washington Trust for Historic Preservation
1204 Minor Ave
Seattle, WA 98101

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The West Seattle Link Extension (WSLE) and Ballard Link Extension (BLE) projects are elements of the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The WSLE would be about 4.7 miles long and would include stations at SODO, Delridge, Avalon, and Alaska Junction. The BLE would be about 7.1 miles long and would include a new 3.3-mile light rail-only tunnel in Downtown Seattle. Stations for the BLE would serve Chinatown-International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

The WSLE is scheduled to begin service along the full line in 2032. The BLE is scheduled to begin service in 2039.

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> Kristina Walker Tacoma Deputy Mayor

Key milestones to date are summarized below.

- February 2018: Early Scoping
  - Early scoping notice in the SEPA Register began Alternatives Development process under SEPA.
     Sound Transit notified interested agencies of early scoping for the combined projects
  - o FTA initiated Government-to-Government consultation with federally recognized Tribes.
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  - FTA published Notice of Intent (NOI) to prepare an EIS in the Federal Register (84 Federal Register 3541) began formal scoping for the combined West Seattle and Ballard Link Extensions Draft EIS under NEPA.
  - o Sound Transit published a Determination of Significance in the SEPA Register
- May 2019: Identification of Draft EIS Alternatives and Preferred Alternative
  - Sound Transit Board directed staff to conduct an initial assessment of additional alternatives suggested during the EIS scoping period. Following completion of that initial assessment, the Sound Transit Board approved Motion M2019-104 in October 2019, which identified additional alternatives to study in the Draft EIS.
- January 2022: WSBLE Draft EIS published, followed by a 90-day public comment period.
- July 2022: Based on Draft EIS analysis and comments received from Tribes, the public, and agency partners, Sound Transit Board identified Preferred Alternative for the WSLE, directed staff to advance preliminary engineering and environmental review of WSLE, and directed staff to conduct further studies for the BLE.
- February 2023: Further studies for BLE were completed and the results and public feedback on the studies were presented to the Sound Transit Board.
- March 2023: Sound Transit Board identified Preferred Alternative for BLE.

# **Separating the Project Environmental Reviews**

As described in the Draft EIS, the WSLE and the BLE would operate as separate lines in the light rail system. The Draft EIS evaluated both extensions together, because of their location, schedule, and review efficiencies for partner agencies as described above.

Because the NEPA process for the two extensions began with one NOI in the Federal Register, FTA considered the appropriate steps under NEPA for continuing the process separately for the two extensions. FTA has determined that to separate the environmental review for the WSLE and BLE projects, the existing NOI published in the Federal Register in February 2019 can only continue to pertain to one extension, and the other extension will initiate a separate NEPA action under a new NOI.

The WSLE is more advanced, with preliminary engineering of the preferred alternative underway, therefore, FTA and Sound Transit will proceed with the WSLE under the existing NOI, redefining the project to remove the BLE portions. As described in the Draft EIS, the WSLE will consist of about 4.7 miles of new light rail line, including stations at SODO, Delridge, Avalon, and Alaska Junction. Sound Transit and FTA will proceed with the preparation and publication of a Final EIS for the WSLE, which is anticipated to be completed in 2024. The Final EIS will include responses to comments received on the West Seattle and Ballard Link Extensions Draft EIS that are related to the West Seattle Link Extension or are corridor-wide comments.

For the BLE, FTA and Sound Transit will issue a new NOI under NEPA. (There is no similar need to issue a new scoping notice under SEPA). All previous scoping comments, public outreach, and environmental analysis related to BLE will be carried forward into a new Draft NEPA/SEPA EIS focused on BLE. This Draft EIS also will contain additional analysis related to the Sound Transit Board's direction for further studies and a preferred alternative for BLE. The BLE Draft EIS publication will be followed by a public comment period.

Other federal programs that typically fall under the NEPA umbrella for evaluation -- such as Section 106 of the National Historic Preservation Act and the Endangered Species Act -- will also be divided and defined separately for the two extensions.

# **Next Steps**

The following generally describes the anticipated next steps for the two light rail extensions. More detail will be provided as FTA and Sound Transit continue Tribal consultation and agency coordination for both extensions.

<u>WSLE</u>: In the coming months, Sound Transit and FTA will prepare the Final EIS for the WSLE project. The Final EIS will include the analysis from the West Seattle and Ballard Link Extensions Draft EIS for the WSLE alternatives, updated as appropriate, and will reflect the preferred alternative as well as other refinements/alternatives identified by the Sound Transit Board in July 2022. FTA and Sound Transit will continue to engage with Tribes, agencies and the public through the environmental review process. Publication of the Final EIS is currently anticipated in 2024, followed by the Sound Transit Board's selection of the project to be built and FTA's issuance of a Record of Decision. Sound Transit will then begin final design, permitting, property acquisition, and construction of the WSLE.

In addition, the separate Draft EIS will rely on and incorporate the existing work to date based on various NEPA and FTA statutes and regulations that support streamlining and avoiding duplication. The separate Draft EIS also will meet recent changes to Federal law that require that the Record of Decision (ROD) be issued within two years of issuance of the NOI. The separate Draft EIS will include the same analysis for the BLE alternatives as the previous Draft EIS that was issued for the combined West Seattle and Ballard Link Extensions, with updates as appropriate to reflect project refinements and other changes. Details of the BLE environmental review will be shared when available.

Sound Transit and FTA will ensure the public is made aware of this decision to separate the environmental documents for the West Seattle and Ballard Link Extensions through Sound Transit's robust public outreach program, including email updates, website, discussion at Sound Transit board meetings, workshops, and community fairs.

FTA and Sound Transit look forward to continuing our coordination and consultation for both projects as they move forward through the NEPA/SEPA processes. If you have any questions about the projects or the revised approach to environmental review, please contact Lauren Swift, Central Corridor Environmental Manager, at <a href="mailto:lauren.swift@soundtransit.org">lauren.swift@soundtransit.org</a> or 206/398-5301, or Mark Assam, Environmental Protection Specialist, at <a href="mark.assam@dot.gov">mark.assam@dot.gov</a> or 206/220-4465.

Sincerely,

Cathal Ridge
Cathal Ridge, Executive Corridor Director

cc: Huy Pham, Preservation Programs Director, Washington Trust for Historic Preservation
Lauren Swift, Central Corridor Environmental Manager, Sound Transit
Leda Chahim, Government & Community Relations Manager Central Corridor, Sound Transit
Alex Stevenson, Manager-Cultural Resources, Sound Transit
Kent Hale, Director-Environmental Planning, Sound Transit
Mark Assam, Environmental Protection Specialist, FTA



July 10, 2023 Sent via email

Julia Levitt Strategic Advisor Seattle Center 305 Harrison St Seattle, WA 98109

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Julia,

The purpose of this letter is to update agency partners on the National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) process for Sound Transit's West Seattle Link Extension and Ballard Link Extension projects. These projects will expand Link light rail transit service from West Seattle to SODO and from Downtown Seattle to Ballard.

After completing a Draft Environmental Impact Statement that evaluated the combined West Seattle and Ballard Link extension projects, Sound Transit, in consultation with the Federal Transit Administration (FTA), determined that the environmental review process for the two extensions should continue separately. The two projects have different opening dates, and they will ultimately function as separate lines, with the West Seattle Link Extension connecting to Everett and the Ballard Link Extension connecting to Tacoma. The two projects are also now on different schedules for completion of environmental review.

The decision to separate the environmental review processes for these extensions was not made lightly, and it follows consideration of all the feedback received to date from the Tribes, agencies, and public. The information below summarizes the environmental process to date, explains the decision to separate the environmental review for the West Seattle Link Extension and the Ballard Link Extension projects moving forward, and describes anticipated next steps.

## Project Background and Environmental Review Process to Date

The West Seattle Link Extension (WSLE) and Ballard Link Extension (BLE) projects are elements of the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The WSLE would be about 4.7 miles long and would include stations at SODO, Delridge, Avalon, and Alaska Junction. The BLE would be about 7.1 miles long and would include a new 3.3-mile light rail-only tunnel in Downtown Seattle. Stations for the BLE would serve Chinatown-International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

The WSLE is scheduled to begin service along the full line in 2032. The BLE is scheduled to begin service in 2039.

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Joe McDermott
King County Councilmember

## Roger Millar

Washington State Secretary of Transportation

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**Dave Upthegrove** *King County Council Chair* 

Peter von Reichbauer King County Councilmember

> Kristina Walker Tacoma Deputy Mayor

CHIEF EXECUTIVE OFFICER
Julie E. Timm

Sound Transit and FTA evaluated both extensions under a single EIS because they have overlapping project areas and, when started, were on the same environmental review timeline. Combining the environmental review process for both extensions created efficiencies for lead agency, partner agency, and Tribal consultation, making the best use of staff resources during the extensive collaboration necessary to move the light rail extensions forward. The West Seattle and Ballard Link Extensions Draft EIS evaluated the WSLE separately from the BLE except where appropriate in the Cumulative Effects analysis. For example, Chapter 4, Affected Environment and Environmental Consequences was separated into two main sections: Section 4.2 West Seattle Link Extension, and Section 4.3 Ballard Link Extension. Each section separately evaluated the effects of the respective link extensions. Chapter 5, Cumulative Effects, evaluated the effects of the two extensions when considered together.

Key milestones to date are summarized below.

- February 2018: Early Scoping
  - Early scoping notice in the SEPA Register began Alternatives Development process under SEPA.
     Sound Transit notified interested agencies of early scoping for the combined projects
  - o FTA initiated Government-to-Government consultation with federally recognized Tribes.
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- February 2023: Further studies for BLE were completed and the results and public feedback on the studies were presented to the Sound Transit Board.
- March 2023: Sound Transit Board identified Preferred Alternative for BLE.

## **Separating the Project Environmental Reviews**

As described in the Draft EIS, the WSLE and the BLE would operate as separate lines in the light rail system. The Draft EIS evaluated both extensions together, because of their location, schedule, and review efficiencies for partner agencies as described above.

While the WSLE and BLE were evaluated together in the Draft EIS, given the Sound Transit Board's direction in July 2022 for further studies for the BLE and the additional environmental review needed for some of the project refinements resulting from the Sound Transit Board action in March 2023, environmental reviews for the two extensions are no longer on the same schedule. Rather than delay completion of the environmental review process for the WSLE while additional conceptual engineering and environmental review are conducted for the BLE, Sound Transit and FTA have decided to complete environmental review for each extension separately. Because they will operate as separate lines, the extensions are stand-alone projects with independent utility. Proceeding with separate environmental review processes for each extension enables Sound Transit and FTA to minimize delay in delivering

WSLE while further studies are undertaken on BLE. Advancing WSLE also minimizes further delay in providing a new high-capacity transit connection serving environmental justice communities south of the study area for whom the WSLE stations would be a transfer point when traveling to or through downtown.

Because the NEPA process for the two extensions began with one NOI in the Federal Register, FTA considered the appropriate steps under NEPA for continuing the process separately for the two extensions. FTA has determined that to separate the environmental review for the WSLE and BLE projects, the existing NOI published in the Federal Register in February 2019 can only continue to pertain to one extension, and the other extension will initiate a separate NEPA action under a new NOI.

The WSLE is more advanced, with preliminary engineering of the preferred alternative underway, therefore, FTA and Sound Transit will proceed with the WSLE under the existing NOI, redefining the project to remove the BLE portions. As described in the Draft EIS, the WSLE will consist of about 4.7 miles of new light rail line, including stations at SODO, Delridge, Avalon, and Alaska Junction. Sound Transit and FTA will proceed with the preparation and publication of a Final EIS for the WSLE, which is anticipated to be completed in 2024. The Final EIS will include responses to comments received on the West Seattle and Ballard Link Extensions Draft EIS that are related to the West Seattle Link Extension or are corridor-wide comments.

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The following generally describes the anticipated next steps for the two light rail extensions. More detail will be provided as FTA and Sound Transit continue Tribal consultation and agency coordination for both extensions.

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<u>BLE</u>: FTA and Sound Transit will issue a new NOI and prepare a separate Draft EIS focused on the BLE. That Draft EIS will carry forward the BLE analysis from the West Seattle and Ballard Link Extensions Draft EIS. The BLE alternatives will be updated as appropriate, including analysis of the preferred alternative as well as other refinements/alternatives identified by the Sound Transit Board in March 2023. FTA and Sound Transit will continue to engage with Tribes and agencies and will provide for public engagement consistent with NEPA and SEPA requirements. FTA will initiate Government-to-Government consultation and Section 106 consultation for the BLE project.

While a new NOI will be issued for BLE to ensure technical compliance with NEPA requirements, environmental review for the BLE is not starting over. The years of previous stakeholder engagement and environmental analysis will be used and included in preparing the Draft EIS focused on BLE. This includes all the feedback from Tribes, agencies, and the public received to date. For example, while a scoping period will be conducted along with issuance of the new NOI, commenters who previously provided scoping comments do not have to comment again as their previous comments will be carried forward. Comments made on the West Seattle and Ballard Link Extensions Draft EIS related to the Ballard Link Extension will also be considered during preparation of the Draft EIS focused on BLE and responded to as part of the BLE Final EIS.

In addition, the separate Draft EIS will rely on and incorporate the existing work to date based on various NEPA and FTA statutes and regulations that support streamlining and avoiding duplication. The separate Draft EIS also will meet recent changes to Federal law that require that the Record of Decision (ROD) be issued within two years of issuance of the NOI. The separate Draft EIS will include the same analysis for the BLE alternatives as the previous Draft EIS that was issued for the combined West Seattle and Ballard Link Extensions, with updates as appropriate to reflect project refinements and other changes. Details of the BLE environmental review will be shared when available.

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Sincerely,

Cathal Ridge

Cathal Ridge, Executive Corridor Director

cc: Lauren Swift, Central Corridor Environmental Manager, Sound Transit
Leda Chahim, Government & Community Relations Manager Central Corridor, Sound Transit
Alex Stevenson, Manager-Cultural Resources, Sound Transit
Kent Hale, Director-Environmental Planning, Sound Transit
Mark Assam, Environmental Protection Specialist, FTA



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 2, 2023

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
P.O. Box 48343
Olympia, WA 98504-8343

**Subject: Sound Transit** 

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Dr. Brooks:

FTA initiated Section 106 consultation with SHPO on the original West Seattle and Ballard Link Extensions Project in correspondence dated February 25, 2019. On September 3, 2021, in correspondence to SHPO, FTA defined a revised APE boundary. SHPO provided a conditional agreement with the amended APE in correspondence to FTA dated October 5, 2021, and requested additional project information.

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



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August 2, 2023

The Honorable Jaison Elkins Chairman Muckleshoot Indian Tribe 39015 - 172nd Avenue SE Auburn, WA 98092

Subject: Sound Transit

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

## Dear Chairman Elkins:

August 2, 2023 Page 2

FTA initiated Section 106 consultation with your tribe on the original West Seattle and Ballard Link Extensions Project in correspondence dated February 25, 2019. On September 3, 2021, in correspondence to your tribe, FTA defined a revised APE boundary.

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

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Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Laura Murphy, Cultural Resources, Muckleshoot Indian Tribe

Madrienne White, Public and Government Relations Manager, Muckleshoot Indian Tribe Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



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August 2, 2023

The Honorable Robert de los Angeles Chairman Snoqualmie Indian Tribe P.O. Box 969 Snoqualmie, WA 98065

**Subject: Sound Transit** 

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Chairman de los Angeles:

August 2, 2023 Page 2

FTA initiated Section 106 consultation with your tribe on the original West Seattle and Ballard Link Extensions Project in correspondence dated February 25, 2019. On September 3, 2021, in correspondence to your tribe, FTA defined a revised APE boundary.

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Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Steven Moses, Director, Archeology and Historic Preservation, Snoqualmie Indian Tribe Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



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August 2, 2023

The Honorable Eric White Chairman Stillaguamish Tribe of Indians of Washington P.O. Box 277 Arlington, WA 98223-0297

Subject: Sound Transit

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment

SHPO Project Tracking Code: 2019-02-01457

## Dear Chairman White:

FTA initiated Section 106 consultation with your tribe on the original West Seattle and Ballard Link Extensions Project in correspondence dated February 25, 2019. On September 3, 2021, in correspondence to your tribe, FTA defined a revised APE boundary.

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Kerry Lyste, Tribal Historic Preservation Officer, Stillaguamish Tribe of Indians of Washington

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



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August 2, 2023

The Honorable Leonard Forsman Chairman Suquamish Indian Tribe of the Port Madison Reservation P.O. Box 498 Suquamish, WA 98392-0498

Subject: Sound Transit

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

## Dear Chairman Forsman:

FTA initiated Section 106 consultation with your tribe on the original West Seattle and Ballard Link Extensions Project in correspondence dated February 25, 2019. On September 3, 2021, in correspondence to your tribe, FTA defined a revised APE boundary.

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Dennis Lewarch, Tribal Historic Preservation Officer, Suquamish Indian Tribe of the Port Madison Reservation

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



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August 2, 2023

The Honorable Teri Gobin Chairwoman Tulalip Tribes of Washington 6406 Marine Drive Tulalip, WA 98271

Subject: Sound Transit

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

# Dear Chairwoman Gobin:

FTA initiated Section 106 consultation with your tribe on the original West Seattle and Ballard Link Extensions Project in correspondence dated February 25, 2019. On September 3, 2021, in correspondence to your tribe, FTA defined a revised APE boundary.

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Richard Young, Cultural Resources, Hibulb Cultural Center & Natural History Preserve, Tulalip Tribes of Washington

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



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August 2, 2023

The Honorable Gerald Lewis Chairman Confederated Tribes and Bands of the Yakama Nation P.O. Box 151 Toppenish, WA 98948

Subject: Sound Transit

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment

SHPO Project Tracking Code: 2019-02-01457

# Dear Chairman Lewis:

FTA initiated Section 106 consultation with your tribe on the original West Seattle and Ballard Link Extensions Project in correspondence dated February 25, 2019. On September 3, 2021, in correspondence to your tribe, FTA defined a revised APE boundary.

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

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Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Kate Valdez, Tribal Historic Preservation Officer, Confederated Tribes and Bands of the Yakama Nation

Casey Barney, Interim Program Manager, Confederated Tribes and Bands of the Yakama Nation

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 2, 2023

Eugenia Woo Director of Preservation Services Historic Seattle 1117 Minor Avenue Seattle, WA 98101

**Subject: Sound Transit** 

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Woo:

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

With the separation of the environmental review processes for the two light rail extensions described above, FTA would like to confirm your interest in continuing as a Section 106 consulting party for the West Seattle Link Extension Project. If your organization would like to continue Section 106 consultation on the West Seattle Link Extension Project, please respond accordingly within 30 days of receipt of this letter. Alternatively, if you do not want to continue Section 106 consultation on the West Seattle Link Extension Project, please let FTA know that as well.

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE, and requests feedback on whether your organization would like to continue participating as a Section 106 consulting party on the West Seattle Link Extension Project, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 2, 2023

Lisa Howard Executive Director Alliance for Pioneer Square P.O. Box 4507 Seattle, WA 98194

Subject: Sound Transit

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Howard:

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

With the separation of the environmental review processes for the two light rail extensions described above, FTA would like to confirm your interest in continuing as a Section 106 consulting party for the West Seattle Link Extension Project. If your organization would like to continue Section 106 consultation on the West Seattle Link Extension Project, please respond accordingly within 30 days of receipt of this letter. Alternatively, if you do not want to continue Section 106 consultation on the West Seattle Link Extension Project, please let FTA know that as well.

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Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 2, 2023

Sarah Sodt City Historic Preservation Officer City of Seattle Historic Preservation Office P.O. Box 94649 Seattle, WA 98124-4649

Subject: Sound Transit

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Sodt:

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

With the separation of the environmental review processes for the two light rail extensions described above, FTA would like to confirm your interest in continuing as a Section 106 consulting party for the West Seattle Link Extension Project. If your organization would like to continue Section 106 consultation on the West Seattle Link Extension Project, please respond accordingly within 30 days of receipt of this letter. Alternatively, if you do not want to continue Section 106 consultation on the West Seattle Link Extension Project, please let FTA know that as well.

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE, and requests feedback on whether your organization would like to continue participating as a Section 106 consulting party on the West Seattle Link Extension Project, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



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August 2, 2023

Kathleen Barry Johnson Executive Director Historic South Downtown Community Preservation and Development Authority 409B Maynard Avenue South Seattle, WA 98107

Subject: Sound Transit

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Barry Johnson:

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

With the separation of the environmental review processes for the two light rail extensions described above, FTA would like to confirm your interest in continuing as a Section 106 consulting party for the West Seattle Link Extension Project. If your organization would like to continue Section 106 consultation on the West Seattle Link Extension Project, please respond accordingly within 30 days of receipt of this letter. Alternatively, if you do not want to continue Section 106 consultation on the West Seattle Link Extension Project, please let FTA know that as well.

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE, and requests feedback on whether your organization would like to continue participating as a Section 106 consulting party on the West Seattle Link Extension Project, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 2, 2023

Derek Lum Equitable Development Policy Analyst InterIm Community Development Association 310 Maynard Avenue South Seattle, WA 98104

Subject: Sound Transit

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment

SHPO Project Tracking Code: 2019-02-01457

Dear Mr. Lum:

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

With the separation of the environmental review processes for the two light rail extensions described above, FTA would like to confirm your interest in continuing as a Section 106 consulting party for the West Seattle Link Extension Project. If your organization would like to continue Section 106 consultation on the West Seattle Link Extension Project, please respond accordingly within 30 days of receipt of this letter. Alternatively, if you do not want to continue Section 106 consultation on the West Seattle Link Extension Project, please let FTA know that as well.

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE, and requests feedback on whether your organization would like to continue participating as a Section 106 consulting party on the West Seattle Link Extension Project, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 2, 2023

Jennifer Meisner Preservation Officer King County Historic Preservation Program 201 South Jackson Street, Suite 700 Seattle, WA 98104

**Subject: Sound Transit** 

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Meisner:

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

With the separation of the environmental review processes for the two light rail extensions described above, FTA would like to confirm your interest in continuing as a Section 106 consulting party for the West Seattle Link Extension Project. If your organization would like to continue Section 106 consultation on the West Seattle Link Extension Project, please respond accordingly within 30 days of receipt of this letter. Alternatively, if you do not want to continue Section 106 consultation on the West Seattle Link Extension Project, please let FTA know that as well.

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Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

com le Phelis

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 2, 2023

Ryan Smith Principal Martin Smith, Inc. 1932 1st Avenue, Suite 1000 Seattle, WA 98101

Subject: Sound Transit

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Mr. Smith:

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

With the separation of the environmental review processes for the two light rail extensions described above, FTA would like to confirm your interest in continuing as a Section 106 consulting party for the West Seattle Link Extension Project. If your organization would like to continue Section 106 consultation on the West Seattle Link Extension Project, please respond accordingly within 30 days of receipt of this letter. Alternatively, if you do not want to continue Section 106 consultation on the West Seattle Link Extension Project, please let FTA know that as well.

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE, and requests feedback on whether your organization would like to continue participating as a Section 106 consulting party on the West Seattle Link Extension Project, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 2, 2023

Julia Levitt Strategic Advisor Seattle Center Redevelopment Office 305 Harrison Street Seattle, WA 98109

**Subject: Sound Transit** 

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment

SHPO Project Tracking Code: 2019-02-01457

Dear Ms. Levitt:

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

With the separation of the environmental review processes for the two light rail extensions described above, FTA would like to confirm your interest in continuing as a Section 106 consulting party for the West Seattle Link Extension Project. If your organization would like to continue Section 106 consultation on the West Seattle Link Extension Project, please respond accordingly within 30 days of receipt of this letter. Alternatively, if you do not want to continue Section 106 consultation on the West Seattle Link Extension Project, please let FTA know that as well.

Pursuant to 36 CFR Part 800, FTA invites your comments on the amended APE, and requests feedback on whether your organization would like to continue participating as a Section 106 consulting party on the West Seattle Link Extension Project, within 30 days of receipt of this letter. If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact Mark Assam at (206) 220-4465 or mark.assam@dot.gov.

Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 2, 2023

Jared Jonson
Director | Property Operations
Seattle Chinatown-International District Preservation & Development Authority
P.O. Box 3302
Seattle, WA 98114

**Subject: Sound Transit** 

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment

SHPO Project Tracking Code: 2019-02-01457

Dear Mr. Jonson:

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

With the separation of the environmental review processes for the two light rail extensions described above, FTA would like to confirm your interest in continuing as a Section 106 consulting party for the West Seattle Link Extension Project. If your organization would like to continue Section 106 consultation on the West Seattle Link Extension Project, please respond accordingly within 30 days of receipt of this letter. Alternatively, if you do not want to continue Section 106 consultation on the West Seattle Link Extension Project, please let FTA know that as well.

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Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 2, 2023

Michael King, Ph.D. Executive Director Southwest Seattle Historical Society 3003 61st Avenue SW Seattle, WA 98116

Subject: Sound Transit

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

**Area of Potential Effects Amendment** 

SHPO Project Tracking Code: 2019-02-01457

Dear Dr. King:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle Link Extension Project, formerly known as the West Seattle and Ballard Link Extensions Project. On July 10, 2023, Sound Transit sent your office correspondence that described a redefinition of the West Seattle and Ballard Link Extensions Project to remove the Ballard Link Extension portion of the project, and separate the environmental review processes for the two light rail extensions, i.e., the West Seattle Link Extension and the Ballard Link Extension. As described in the July 10, 2023 Sound Transit correspondence, the existing environmental review process that was initiated for the West Seattle and Ballard Link Extensions Project will continue forward, with the project redefined to be a light rail extension from the SODO area in south downtown Seattle to West Seattle's Alaska Junction area in Seattle, King County, Washington, and renamed as the West Seattle Link Extension Project. This letter requests your feedback on the proposed amendment to the Area of Potential Effects (APE) resulting from the redefined West Seattle Link Extension Project limits, as well as feedback on whether your organization would like to continue participating as a Section 106 consulting party for the West Seattle Link Extension Project.

FTA invited your organization to participate in the Section 106 consultation process on the original West Seattle and Ballard Link Extensions Project in correspondence dated December 7, 2020. On September 3, 2021, in correspondence to your organization, FTA defined a revised APE boundary.

As shown on the enclosed APE Map Set, the portion of the APE associated with the Ballard Link Extension has been removed. The APE has also been amended to incorporate areas where new design elements have been identified for the West Seattle Link Extension Project.

With the separation of the environmental review processes for the two light rail extensions described above, FTA would like to confirm your interest in continuing as a Section 106 consulting party for the West Seattle Link Extension Project. If your organization would like to continue Section 106 consultation on the West Seattle Link Extension Project, please respond accordingly within 30 days of receipt of this letter. Alternatively, if you do not want to continue Section 106 consultation on the West Seattle Link Extension Project, please let FTA know that as well.

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Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: APE Map Set



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

August 2, 2023

Huy Pham Preservation Programs Director Washington Trust for Historic Preservation 1204 Minor Avenue Seattle, WA 98101

Subject: Sound Transit

West Seattle Link Extension Project

West Seattle and Ballard Link Extensions Project National Historic Preservation Act, Section 106

Area of Potential Effects Amendment

SHPO Project Tracking Code: 2019-02-01457

Dear Mr. Pham:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act (Section 106), and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, for the West Seattle Link Extension Project, formerly known as the West Seattle and Ballard Link Extensions Project. On July 10, 2023, Sound Transit sent your office correspondence that described a redefinition of the West Seattle and Ballard Link Extensions Project to remove the Ballard Link Extension portion of the project, and separate the environmental review processes for the two light rail extensions, i.e., the West Seattle Link Extension and the Ballard Link Extension. As described in the July 10, 2023 Sound Transit correspondence, the existing environmental review process that was initiated for the West Seattle and Ballard Link Extensions Project will continue forward, with the project redefined to be a light rail extension from the SODO area in south downtown Seattle to West Seattle's Alaska Junction area in Seattle, King County, Washington, and renamed as the West Seattle Link Extension Project. This letter requests your feedback on the proposed amendment to the Area of Potential Effects (APE) resulting from the redefined West Seattle Link Extension Project limits, as well as feedback on whether your organization would like to continue participating as a Section 106 consulting party for the West Seattle Link Extension Project.

FTA invited your organization to participate in the Section 106 consultation process on the original West Seattle and Ballard Link Extensions Project in correspondence dated August 31, 2020. On September 3, 2021, in correspondence to your organization, FTA defined a revised APE boundary.

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Thank you for your consultation on the West Seattle Link Extension Project.

Sincerely,

Susan K. Fletcher

Acting Regional Administrator

usai k. Thelet

cc: Dennis Wardlaw, Transportation Archaeologist, Washington Department of Archaeology and Historic Preservation

Maureen Elenga, Transportation Project Reviewer, Washington Department of Archaeology and Historic Preservation

Dezerae Hayes, Director of Tribal Relations, Sound Transit

Alex Stevenson, Cultural Resources Program Manager, Sound Transit

Lauren Swift, Central Corridor Environmental Manager, Sound Transit

Enclosure: APE Map Set



August 14, 2023

Susan K. Fletcher
Acting Regional Administrator
U.S. Department of Transportation
Federal Transit Administration Region X

In future correspondence please refer to: Project Tracking Code: 2019-02-01457

Property: King County West Seattle to Ballard Light Rail Extension

Re: Archaeology – Amended APE Concur

Dear Susan K. Fletcher:

Thank you for contacting the State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced project. In response, we have reviewed your description and map of the area of potential effect (APE).

We concur with your amended definition of the APE. Please provide us with your survey methodology before proceeding with any inventories. Along with the results of the inventory we will need to review your consultation with the concerned tribes, and other interested/affected parties. Please provide any correspondence or comments from concerned tribes and/or other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. Should additional information about the project become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,

Maureen Elenga, M.A. Transportation Reviewer

(360) 972-4539

Maureen. Elenga@dahp.wa.gov



This page is intentionally left blank.

From: <u>Chasanov, Amy</u>

To: Swift, Lauren; Durkin, Cassandra

Subject: FW: West Seattle Link Extension (WSLE) Project- Section 106 Consultation/ Revised Area of Potential Effect

**Date:** Thursday, August 31, 2023 2:16:55 PM

Attachments: <u>image001.png</u>

image002.png image005.png image006.png image007.png

**CAUTION:** This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

FYI

### **Amy Chasanov** (she/her)

ST Mitigation and Concurrence Manager City of Seattle, <u>Department of Transportation</u>

O: 206-684-3970 | M: 206-475-0156 | <u>Amy.Chasanov@seattle.gov</u>

Web | Blog | Facebook | Twitter | Instagram | YouTube | Flickr | Customer Service

From: Sodt, Sarah <Sarah.Sodt@seattle.gov>
Sent: Thursday, August 31, 2023 1:22 PM
To: Littauer, Erin (FTA) <erin.littauer@dot.gov>

**Cc:** Assam, Mark (FTA) <mark.assam@dot.gov>; Chasanov, Amy <Amy.Chasanov@seattle.gov>; de

Lange, Michael < Michael.deLange@seattle.gov>

**Subject:** RE: West Seattle Link Extension (WSLE) Project- Section 106 Consultation/ Revised Area of

Potential Effect

Hi Erin,

Just to follow up on my initial response. We have no additional comments on the APE at this time, understanding it may expand or contract in the future. We look forward to getting into more detail on the consultation regarding impacts to historic and cultural resources as the project moves forward.

Thanks,

Sarah

#### Sarah Sodt

City Historic Preservation Officer, Historic Preservation Program

Pronouns: she/her/hers

City of Seattle, <u>Department of Neighborhoods</u>

O: 206-615-1786 | <u>sarah.sodt@seattle.gov</u>

Mailing address: P.O. Box 94649, Seattle, WA 98124-4649 Office address: 600 Fourth Ave., 4<sup>th</sup> Floor, Seattle, WA 98104

Blog | Facebook | Twitter | Instagram

**From:** Littauer, Erin (FTA) < <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>>

**Sent:** Tuesday, August 22, 2023 7:14 AM **To:** Sodt, Sarah < Sarah.Sodt@seattle.gov>

**Cc:** Assam, Mark (FTA) < mark.assam@dot.gov >; Chasanov, Amy < Amy.Chasanov@seattle.gov >; de Lange, Michael < Michael.deLange@seattle.gov >

**Subject:** RE: West Seattle Link Extension (WSLE) Project- Section 106 Consultation/ Revised Area of Potential Effect

#### **CAUTION: External Email**

Hi Sarah,

Thank you for your reply.

Thank you,

Erin Littauer
Environmental Protection Specialist
Federal Transit Administration- Region 10
U.S. Department of Transportation
Erin.littauer@dot.gov | www.transit.dot.gov

From: Sodt, Sarah <<u>Sarah.Sodt@seattle.gov</u>>
Sent: Monday, August 21, 2023 9:07 AM
To: Littauer, Erin (FTA) <<u>erin.littauer@dot.gov</u>>

**Cc:** Fletcher, Susan (FTA) < <u>susan.fletcher@dot.gov</u>>; Assam, Mark (FTA) < <u>Mark.Assam@dot.gov</u>>; Rastelli, Scot (FTA) < <u>Scot.Rastelli@dot.gov</u>>; Wardlaw, Dennis (DAHP)

<a href="mailto:delange.wa.gov"><a href="mailto:delange.wa.gov

**Subject:** RE: West Seattle Link Extension (WSLE) Project- Section 106 Consultation/ Revised Area of Potential Effect

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello Erin,

Confirming receipt and that we wish to continue as a consulting party to the Section 106 process for the West Seattle Link Extension Project. We will follow up shortly with any comments we may have to the amended APE.

Thanks,

Sarah

#### Sarah Sodt

City Historic Preservation Officer, Historic Preservation Program

Pronouns: she/her/hers

City of Seattle, <u>Department of Neighborhoods</u>
O: 206-615-1786 | <u>sarah.sodt@seattle.gov</u>

Mailing address: P.O. Box 94649, Seattle, WA 98124-4649

Office address: 600 Fourth Ave., 4<sup>th</sup> Floor, Seattle, WA 98104

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**From:** Littauer, Erin (FTA) < <u>erin.littauer@dot.gov</u>>

**Sent:** Thursday, August 3, 2023 3:04 PM **To:** Sodt, Sarah < Sarah.Sodt@seattle.gov>

**Cc:** Fletcher, Susan (FTA) < susan.fletcher@dot.gov >; Assam, Mark (FTA) < mark.assam@dot.gov >;

Rastelli, Scot (FTA) < Scot.Rastelli@dot.gov >; Wardlaw, Dennis (DAHP)

<a href="mailto:dennis.wardlaw@dahp.wa.gov">dezerae.hayes@soundtransit.org</a>; <a href="mailto:dennis.wardlaw.gov">dezerae.hayes@soundtransit.org</a>; <a href="mailt

**Subject:** West Seattle Link Extension (WSLE) Project- Section 106 Consultation/ Revised Area of

Potential Effect

#### **CAUTION: External Email**

Dear Ms. Sodt,

Please see the attached Section 106 consultation and revised Area of Potential Effects for the West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project.

Thank you,

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September 5, 2023

The Honorable Cecile Hansen The Duwamish Tribe 4705 W Marginal Way SW Seattle, WA 98106

**Subject: Sound Transit West Seattle Link Extension Project, Area of Potential Effect Amendment** 

Dear Chairwoman Hansen:

Sound Transit is planning the West Seattle Link Extension (WSLE) Project which will connect West Seattle with the SODO neighborhood of Seattle, in King County Washington. Previously the WSLE Project was combined with the Ballard Link Extension Project but, as described in the letter dated July 10, 2023 to the Tribe, Sound Transit, in consultation with the Federal Transit Administration (FTA), has decided to separate the two projects. As such, the FTA has recently defined a new area of potential effect (APE) for the WSLE project which removes the portion connected to the Ballard Link Extension and includes some additional WSLE project refinements. The APE as currently defined is depicted on the enclosed figures.

Sound Transit wishes to share this recent update to the APE with the Duwamish Tribe and requests any comments you may have on it. If you have any questions please feel free to contact Sound Transit Director of Tribal Relations, me at <a href="Dezerae.hayes@soundtransit.org">Dezerae.hayes@soundtransit.org</a> or Sound Transit Cultural Resources Manager Alex Stevenson at <a href="Alex.stevenson@soundtransit.org">Alex.stevenson@soundtransit.org</a>. We appreciate your review of the attached figures and any comments the Duwamish Tribe may have.

Sincerely,

Dezerae R. Hayes
Dezerae Hayes
Director of Tribal Relations

**Enclosure: APE Map Set** 

cc: Alex Stevenson, Cultural Resources Manager, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit

#### **CHAIR**

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Kristina Walker Tacoma Deputy Mayor

CHIEF EXECUTIVE OFFICER
Julie E. Timm



September 13, 2023

The Honorable Michael Evans Snohomish Tribe PO Box 267 Edmonds, WA 98020

Subject: Sound Transit West Seattle Link Extension Project, Area of Potential Effect Amendment

Dear Chairman Evans:

Sound Transit is planning the West Seattle Link Extension (WSLE) Project which will connect West Seattle with the SODO neighborhood of Seattle, in King County Washington. Previously the WSLE Project was combined with the Ballard Link Extension Project but, as described in the letter dated July 10, 2023 to the Tribe, Sound Transit, in consultation with the Federal Transit Administration (FTA), has decided to separate the two projects. As such, the FTA has recently defined a new area of potential effect (APE) for the WSLE project which removes the portion connected to the Ballard Link Extension and includes some additional WSLE project refinements. The APE as currently defined is depicted on the enclosed figures.

Sound Transit wishes to share this recent update to the APE with the Snohomish Tribe and requests any comments you may have on it. If you have any questions please feel free to contact Sound Transit Director of Tribal Relations, me at <a href="Dezerae.hayes@soundtransit.org">Dezerae.hayes@soundtransit.org</a> or Sound Transit Cultural Resources Manager Alex Stevenson at <a href="Alex.stevenson@soundtransit.org">Alex.stevenson@soundtransit.org</a>. We appreciate your review of the attached figures and any comments the Snohomish Tribe may have.

Sincerely,

Dezerae Hayes
Dezerae Hayes
Director of Tribal Relations

**Enclosure: APE Map Set** 

cc: Alex Stevenson, Cultural Resources Manager, Sound Transit Lauren Swift, Central Corridor Environmental Manager, Sound Transit CHAIR

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Washington State Secretary of Transportation

**Ed Prince** Renton Councilmember

> Kim Roscoe Fife Mayor

**Dave Upthegrove** *King County Council Chair* 

Peter von Reichbauer King County Councilmember

Kristina Walker Tacoma Deputy Mayor

CHIEF EXECUTIVE OFFICER
Julie E. Timm

From: Stephanie Trudel < <a href="mailto:strudel@Suquamish.nsn.us">strudel@Suquamish.nsn.us</a>>

**Sent:** Tuesday, September 5, 2023 1:50 PM **To:** Littauer, Erin (FTA) <erin.littauer@dot.gov>

Cc: Iforsman suquamish.nsn.us < <a href="mailto:lforsman@suquamish.nsn.us">lforsman@suquamish.nsn.us</a>>

Subject: RE: [EXTERNAL] West Seattle Link Extension (WSLE) Project- Section 106 Consultation/ Revised Area of Potential

**Effect** 

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello Erin,

Thank you for consulting with the Suquamish Tribe regarding the amended APE for the West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. I reviewed the attached APE Map Set and agree with the amended Area of Potential Effects for the project.

Thanks again, Stephanie

Stephanie Trudel Tribal Historic Preservation Officer Suquamish Tribe PO Box 498 Suquamish, WA 98392-0498 360-394-8533 strudel@suquamish.nsn.us

From: Leonard Forsman < lforsman@suguamish.nsn.us>

Sent: Wednesday, August 30, 2023 2:47 PM

To: Stephanie Trudel < strudel@Suquamish.nsn.us >

Subject: FW: [EXTERNAL] West Seattle Link Extension (WSLE) Project- Section 106 Consultation/ Revised Area of

Potential Effect

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>

Sent: Thursday, August 3, 2023 4:25 PM

To: Leonard Forsman < lforsman@suguamish.nsn.us>

**Cc:** Fletcher, Susan (FTA) < susan.fletcher@dot.gov >; Assam, Mark (FTA) < Mark.Assam@dot.gov >; Rastelli, Scot (FTA) < Scot.Rastelli@dot.gov >; Wardlaw, Dennis (DAHP) < dennis.wardlaw@dahp.wa.gov >; maureen.elenga@dahp.wa.gov ; dezerae.hayes@soundtransit.org; alex.stevenson@soundtransit.org; lauren.swift@soundtransit.org; Dennis Lewarch < dlewarch@Suquamish.nsn.us >

**Subject:** [EXTERNAL] West Seattle Link Extension (WSLE) Project- Section 106 Consultation/ Revised Area of Potential Effect

Dear Chairman Forsman,

Please see the attached Section 106 consultation and revised Area of Potential Effects for the West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. Thank you,

Stevenson, Alex <alex.stevenson@soundtransit.org> From:

Sent: Tuesday, September 12, 2023 7:53 AM

To: Gray, Connie

[EXTERNAL] Fwd: West Seattle Link Extension (WSLE) Project- Section 106 Consultation/ Revised Subject:

Area of Potential Effect

Fyi

Get Outlook for iOS

From: Assam, Mark (FTA) < Mark. Assam@dot.gov> Sent: Monday, September 11, 2023 6:24:27 PM

To: Lisa Howard < lisa@pioneersquare.org>

Cc: Littauer, Erin (FTA) <erin.littauer@dot.gov>; Swift, Lauren <lauren.swift@soundtransit.org>; Durkin, Cassandra

<assandra.durkin@soundtransit.org>; Stevenson, Alex <alex.stevenson@soundtransit.org>; Ann Costanza

<acostanza@anchorgea.com>

Subject: RE: West Seattle Link Extension (WSLE) Project- Section 106 Consultation/ Revised Area of Potential Effect

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Hi Lisa,

Thank you for your response. We will continue Section 106 consultation with you on the West Seattle Link Extension Project.

#### Mark A. Assam, AICP

Environmental Protection Specialist U.S. Department of Transportation Federal Transit Administration | Office of Environmental Programs 915 2nd Avenue, Suite 3192 | Seattle, WA 98174-1002 (206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: Lisa Howard < lisa@pioneersquare.org> Sent: Monday, September 11, 2023 11:11 AM To: Assam, Mark (FTA) < Mark. Assam@dot.gov> Cc: Littauer, Erin (FTA) <erin.littauer@dot.gov>

Subject: RE: West Seattle Link Extension (WSLE) Project- Section 106 Consultation/ Revised Area of Potential Effect

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Mark

I need to acknowledge I missed your 9/3 deadline as I was out. I would like to continue participating as a Section 106 consulting party on the West Seattle Link Extension project if possible. Happy to connect if we need to discuss further.

Thank you, Lisa Dixon Howard **Executive Director** Alliance for Pioneer Square

From: Littauer, Erin (FTA) < <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>>

Sent: Thursday, August 3, 2023 2:57 PM

To: Lisa Howard < lisa@pioneersquare.org>

Cc: Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; Rastelli, Scot (FTA) <<u>Scot.Rastelli@dot.gov</u>>; Wardlaw, Dennis (DAHP) <<u>dennis.wardlaw@dahp.wa.gov</u>>; <u>maureen.elenga@dahp.wa.gov</u>;

dezerae.hayes@soundtransit.org; alex.stevenson@soundtransit.org; lauren.swift@soundtransit.org

Subject: West Seattle Link Extension (WSLE) Project- Section 106 Consultation/ Revised Area of Potential Effect

Dear Ms. Howard.

Please see the attached Section 106 consultation and revised Area of Potential Effects for the West Seattle Link Extension (WSLE)

Project, formerly known as the West Seattle and Ballard Link Extensions Project. Thank you,

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>
Sent: Tuesday, September 19, 2023 10:19 AM

**To:** huy@preservewa.org

Cc: Stevenson, Alex; Assam, Mark (FTA); Ann Costanza

**Subject:** Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link Extension

Project

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Dear Mr. Pham,

On August 3, 2023, the Federal Transit Administration (FTA) sent your organization correspondence under Section 106 of the National Historic Preservation Act regarding the Sound Transit - West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. This correspondence requested your feedback on the proposed amendment to the Area of Potential Effects resulting from the redefined geographic limits of the WSLE Project, requested feedback on whether your organization would like to continue participating as a Section 106 consulting party for the WSLE Project, and finally, requested a response within 30 days of receipt of the letter. To date, we have not received a response from your organization on whether you would like to continue participating as a Section 106 consulting party. As a courtesy follow up to the August 3, 2023 correspondence, we ask that you please respond to this e-mail by **October 2, 2023** to confirm your continued participation as a Section 106 consulting party on the WSLE Project. If we do not hear from your organization by October 3, 2023, we will accept that you no longer wish to participate as a Section 106 consulting party on the WSLE Project.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact me. My contact information is at the bottom of this message.

Thank you for your consultation on the WSLE Project.

Sincerely,

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>
Sent: Tuesday, September 19, 2023 10:25 AM

**To:** julia.levitt@seattle.gov

Cc: Stevenson, Alex; Ann Costanza; Assam, Mark (FTA)

**Subject:** Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link Extension

Project

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Dear Ms. Levitt,

On August 3, 2023, the Federal Transit Administration (FTA) sent your organization correspondence under Section 106 of the National Historic Preservation Act regarding the Sound Transit - West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. This correspondence requested your feedback on the proposed amendment to the Area of Potential Effects resulting from the redefined geographic limits of the WSLE Project, requested feedback on whether your organization would like to continue participating as a Section 106 consulting party for the WSLE Project, and finally, requested a response within 30 days of receipt of the letter. To date, we have not received a response from your organization on whether you would like to continue participating as a Section 106 consulting party. As a courtesy follow up to the August 3, 2023 correspondence, we ask that you please respond to this e-mail by **October 2, 2023** to confirm your continued participation as a Section 106 consulting party on the WSLE Project. If we do not hear from your organization by October 3, 2023, we will accept that you no longer wish to participate as a Section 106 consulting party on the WSLE Project.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact me. My contact information is at the bottom of this message.

Thank you for your consultation on the WSLE Project.

Sincerely,

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>
Sent: Tuesday, September 19, 2023 10:22 AM

**To:** director@loghousemuseum.org

Cc: Assam, Mark (FTA); Stevenson, Alex; Ann Costanza

**Subject:** Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link Extension

Project

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Dear Dr. King,

On August 3, 2023, the Federal Transit Administration (FTA) sent your organization correspondence under Section 106 of the National Historic Preservation Act regarding the Sound Transit - West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. This correspondence requested your feedback on the proposed amendment to the Area of Potential Effects resulting from the redefined geographic limits of the WSLE Project, requested feedback on whether your organization would like to continue participating as a Section 106 consulting party for the WSLE Project, and finally, requested a response within 30 days of receipt of the letter. To date, we have not received a response from your organization on whether you would like to continue participating as a Section 106 consulting party. As a courtesy follow up to the August 3, 2023 correspondence, we ask that you please respond to this e-mail by **October 2, 2023** to confirm your continued participation as a Section 106 consulting party on the WSLE Project. If we do not hear from your organization by October 3, 2023, we will accept that you no longer wish to participate as a Section 106 consulting party on the WSLE Project.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact me. My contact information is at the bottom of this message.

Thank you for your consultation on the WSLE Project.

Sincerely,

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>
Sent: Tuesday, September 19, 2023 10:36 AM
To: jennifer.meisner@kingcounty.gov

Cc: Stevenson, Alex; Ann Costanza; Assam, Mark (FTA)

**Subject:** Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link Extension

Project

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Dear Ms. Meisner,

On August 3, 2023, the Federal Transit Administration (FTA) sent your organization correspondence under Section 106 of the National Historic Preservation Act regarding the Sound Transit - West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. This correspondence requested your feedback on the proposed amendment to the Area of Potential Effects resulting from the redefined geographic limits of the WSLE Project, requested feedback on whether your organization would like to continue participating as a Section 106 consulting party for the WSLE Project, and finally, requested a response within 30 days of receipt of the letter. To date, we have not received a response from your organization on whether you would like to continue participating as a Section 106 consulting party. As a courtesy follow up to the August 3, 2023 correspondence, we ask that you please respond to this e-mail by **October 2, 2023** to confirm your continued participation as a Section 106 consulting party on the WSLE Project. If we do not hear from your organization by October 3, 2023, we will accept that you no longer wish to participate as a Section 106 consulting party on the WSLE Project.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact me. My contact information is at the bottom of this message.

Thank you for your consultation on the WSLE Project.

Sincerely,

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>
Sent: Tuesday, September 19, 2023 10:33 AM

**To:** rsmith@martinsmith.com

Cc: Stevenson, Alex; Ann Costanza; Assam, Mark (FTA)

**Subject:** Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link Extension

Project

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Dear Mr. Smith,

On August 3, 2023, the Federal Transit Administration (FTA) sent your organization correspondence under Section 106 of the National Historic Preservation Act regarding the Sound Transit - West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. This correspondence requested your feedback on the proposed amendment to the Area of Potential Effects resulting from the redefined geographic limits of the WSLE Project, requested feedback on whether your organization would like to continue participating as a Section 106 consulting party for the WSLE Project, and finally, requested a response within 30 days of receipt of the letter. To date, we have not received a response from your organization on whether you would like to continue participating as a Section 106 consulting party. As a courtesy follow up to the August 3, 2023 correspondence, we ask that you please respond to this e-mail by **October 2, 2023** to confirm your continued participation as a Section 106 consulting party on the WSLE Project. If we do not hear from your organization by October 3, 2023, we will accept that you no longer wish to participate as a Section 106 consulting party on the WSLE Project.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact me. My contact information is at the bottom of this message.

Thank you for your consultation on the WSLE Project.

Sincerely,

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>
Sent: Tuesday, September 19, 2023 10:38 AM

**To:** jaredj@scidpda.org

Cc: Stevenson, Alex; Ann Costanza; Assam, Mark (FTA)

**Subject:** Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link Extension

Project

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Dear Mr. Jonson,

On August 3, 2023, the Federal Transit Administration (FTA) sent your organization correspondence under Section 106 of the National Historic Preservation Act regarding the Sound Transit - West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. This correspondence requested your feedback on the proposed amendment to the Area of Potential Effects resulting from the redefined geographic limits of the WSLE Project, requested feedback on whether your organization would like to continue participating as a Section 106 consulting party for the WSLE Project, and finally, requested a response within 30 days of receipt of the letter. To date, we have not received a response from your organization on whether you would like to continue participating as a Section 106 consulting party. As a courtesy follow up to the August 3, 2023 correspondence, we ask that you please respond to this e-mail by **October 2, 2023** to confirm your continued participation as a Section 106 consulting party on the WSLE Project. If we do not hear from your organization by October 3, 2023, we will accept that you no longer wish to participate as a Section 106 consulting party on the WSLE Project.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact me. My contact information is at the bottom of this message.

Thank you for your consultation on the WSLE Project.

Sincerely,

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>
Sent: Tuesday, September 19, 2023 10:41 AM
to: kathleen@historicsouthdowntown.org

Cc: Stevenson, Alex; Ann Costanza; Assam, Mark (FTA)

**Subject:** Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link Extension

Project

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Dear Ms. Barry Johnson,

On August 3, 2023, the Federal Transit Administration (FTA) sent your organization correspondence under Section 106 of the National Historic Preservation Act regarding the Sound Transit - West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. This correspondence requested your feedback on the proposed amendment to the Area of Potential Effects resulting from the redefined geographic limits of the WSLE Project, requested feedback on whether your organization would like to continue participating as a Section 106 consulting party for the WSLE Project, and finally, requested a response within 30 days of receipt of the letter. To date, we have not received a response from your organization on whether you would like to continue participating as a Section 106 consulting party. As a courtesy follow up to the August 3, 2023 correspondence, we ask that you please respond to this e-mail by **October 2, 2023** to confirm your continued participation as a Section 106 consulting party on the WSLE Project. If we do not hear from your organization by October 3, 2023, we will accept that you no longer wish to participate as a Section 106 consulting party on the WSLE Project.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact me. My contact information is at the bottom of this message.

Thank you for your consultation on the WSLE Project.

Sincerely,

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>
Sent: Tuesday, September 19, 2023 10:40 AM

To: dlum@interimcda.org

Cc: Stevenson, Alex; Ann Costanza; Assam, Mark (FTA)

**Subject:** Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link Extension

Project

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Dear Mr. Lum,

On August 3, 2023, the Federal Transit Administration (FTA) sent your organization correspondence under Section 106 of the National Historic Preservation Act regarding the Sound Transit - West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. This correspondence requested your feedback on the proposed amendment to the Area of Potential Effects resulting from the redefined geographic limits of the WSLE Project, requested feedback on whether your organization would like to continue participating as a Section 106 consulting party for the WSLE Project, and finally, requested a response within 30 days of receipt of the letter. To date, we have not received a response from your organization on whether you would like to continue participating as a Section 106 consulting party. As a courtesy follow up to the August 3, 2023 correspondence, we ask that you please respond to this e-mail by **October 2, 2023** to confirm your continued participation as a Section 106 consulting party on the WSLE Project. If we do not hear from your organization by October 3, 2023, we will accept that you no longer wish to participate as a Section 106 consulting party on the WSLE Project.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact me. My contact information is at the bottom of this message.

Thank you for your consultation on the WSLE Project.

Sincerely,

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>
Sent: Tuesday, September 19, 2023 10:43 AM

**To:** eugeniaw@historicseattle.org

Cc: Stevenson, Alex; Ann Costanza; Assam, Mark (FTA)

**Subject:** Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link Extension

Project

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Dear Ms. Woo,

On August 3, 2023, the Federal Transit Administration (FTA) sent your organization correspondence under Section 106 of the National Historic Preservation Act regarding the Sound Transit - West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. This correspondence requested your feedback on the proposed amendment to the Area of Potential Effects resulting from the redefined geographic limits of the WSLE Project, requested feedback on whether your organization would like to continue participating as a Section 106 consulting party for the WSLE Project, and finally, requested a response within 30 days of receipt of the letter. To date, we have not received a response from your organization on whether you would like to continue participating as a Section 106 consulting party. As a courtesy follow up to the August 3, 2023 correspondence, we ask that you please respond to this e-mail by **October 2, 2023** to confirm your continued participation as a Section 106 consulting party on the WSLE Project. If we do not hear from your organization by October 3, 2023, we will accept that you no longer wish to participate as a Section 106 consulting party on the WSLE Project.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact me. My contact information is at the bottom of this message.

Thank you for your consultation on the WSLE Project.

Sincerely,

This page is intentionally left blank.

From: Levitt, Julia <Julia.Levitt@seattle.gov>
Sent: Tuesday, September 19, 2023 1:13 PM
To: Littauer, Erin (FTA); Assam, Mark (FTA)

**Cc:** Stevenson, Alex; Ann Costanza; Chasanov, Amy; Sodt, Sarah

Subject: RE: Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link

**Extension Project** 

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Hello Erin,

Thank you for the communication. The Seattle Center department does not have a property interest in the West Seattle Link Extension (WSLE) project. I no longer want to be a Section 106 consulting party for WSLE.

I would like to remain a Section 106 consulting party for the Ballard Link Extension (BLE) project.

Thank you, Julia Levitt Strategic Advisor Seattle Center 206-300-8171

**From:** Littauer, Erin (FTA) <erin.littauer@dot.gov> **Sent:** Tuesday, September 19, 2023 10:25 AM **To:** Levitt, Julia <Julia.Levitt@seattle.gov>

Cc: Stevenson, Alex <alex.stevenson@soundtransit.org>; Ann Costanza <acostanza@anchorqea.com>; Assam, Mark

(FTA) <mark.assam@dot.gov>

Subject: Section 106 Consulting Party Confirmation-Sound Transit West Seattle Link Extension Project

#### **CAUTION: External Email**

Dear Ms. Levitt,

On August 3, 2023, the Federal Transit Administration (FTA) sent your organization correspondence under Section 106 of the National Historic Preservation Act regarding the Sound Transit - West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. This correspondence requested your feedback on the proposed amendment to the Area of Potential Effects resulting from the redefined geographic limits of the WSLE Project, requested feedback on whether your organization would like to continue participating as a Section 106 consulting party for the WSLE Project, and finally, requested a response within 30 days of receipt of the letter. To date, we have not received a response from your organization on whether you would like to continue participating as a Section 106 consulting party. As a courtesy follow up to the August 3, 2023 correspondence, we ask that you please respond to this e-mail by **October 2, 2023** to confirm your continued participation as a Section 106 consulting party on the WSLE Project. If we do not hear from your organization by October 3, 2023, we will accept that you no longer wish to participate as a Section 106 consulting party on the WSLE Project.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact me. My contact information is at the bottom of this message.

Thank you for your consultation on the WSLE Project.

Sincerely,

From: Stevenson, Alex <alex.stevenson@soundtransit.org>

Sent: Wednesday, October 11, 2023 7:33 AM

**To:** Gray, Connie

**Cc:** Swank, Alisa; Yellin, Michelle

Subject: [EXTERNAL] Fwd: Section 106 Consulting Party Confirmation - Sound Transit West

Seattle Link Extension Project

FYI

Get Outlook for iOS

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>
Sent: Wednesday, October 11, 2023 7:18:04 AM
To: Chris Moore <Chris@preservewa.org>

**Cc:** Stevenson, Alex <alex.stevenson@soundtransit.org>; Assam, Mark (FTA) <mark.assam@dot.gov> **Subject:** RE: Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link Extension Project

**CAUTION:** This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Thank Chris!

Erin

From: Chris Moore < Chris@preservewa.org>
Sent: Tuesday, October 10, 2023 2:02 PM
To: Littauer, Erin (FTA) < erin.littauer@dot.gov>

Subject: RE: Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link Extension Project

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Erin,

Thanks for reaching out. Please direct further communication to me, as we do want to remain a consulting party.

Best, Chris

**Chris Moore** | Executive Director he / him / his

Washington Trust for Historic Preservation 1204 Minor Avenue | Seattle, WA 98101 206-624-9449 (o) | 206-930-5067 (c)

preservewa.org

From: Littauer, Erin (FTA) < <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>>
Sent: Tuesday, September 19, 2023 10:30 AM

**To:** Grants <grants@preservewa.org>; Washington Trust for Historic Preservation <info@preservewa.org> **Subject:** Section 106 Consulting Party Confirmation- Sound Transit West Seattle Link Extension Project

Some people who received this message don't often get email from erin.littauer@dot.gov. Learn why this is important

Good morning,

Please let us know who to direct further communication and confirm interest in remaining a consulting party for the Sound Transit West Seattle Link Extension project.

Thank you,

Erin Littauer
Environmental Protection Specialist
Federal Transit Administration- Region 10
U.S. Department of Transportation
Erin.littauer@dot.gov | www.transit.dot.gov

From: Littauer, Erin (FTA)

Sent: Tuesday, September 19, 2023 10:19 AM

To: huy@preservewa.org

**Cc:** Stevenson, Alex <<u>alex.stevenson@soundtransit.org</u>>; Assam, Mark (FTA) <<u>Mark.Assam@dot.gov</u>>; Ann Costanza

<acostanza@anchorqea.com>

Subject: Section 106 Consulting Party Confirmation-Sound Transit West Seattle Link Extension Project

Dear Mr. Pham,

On August 3, 2023, the Federal Transit Administration (FTA) sent your organization correspondence under Section 106 of the National Historic Preservation Act regarding the Sound Transit - West Seattle Link Extension (WSLE) Project, formerly known as the West Seattle and Ballard Link Extensions Project. This correspondence requested your feedback on the proposed amendment to the Area of Potential Effects resulting from the redefined geographic limits of the WSLE Project, requested feedback on whether your organization would like to continue participating as a Section 106 consulting party for the WSLE Project, and finally, requested a response within 30 days of receipt of the letter. To date, we have not received a response from your organization on whether you would like to continue participating as a Section 106 consulting party. As a courtesy follow up to the August 3, 2023 correspondence, we ask that you please respond to this e-mail by **October 2, 2023** to confirm your continued participation as a Section 106 consulting party on the WSLE Project. If we do not hear from your organization by October 3, 2023, we will accept that you no longer wish to participate as a Section 106 consulting party on the WSLE Project.

If FTA can provide any assistance or additional information which would aid in your prompt reply, please feel free to contact me. My contact information is at the bottom of this message.

Thank you for your consultation on the WSLE Project.

Sincerely,

Erin Littauer Environmental Protection Specialist Federal Transit Administration- Region 10 U.S. Department of Transportation

<u>Erin.littauer@dot.gov</u> | <u>www.transit.dot.gov</u>



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3192 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 18, 2024

Sarah Sodt City Historic Preservation Officer City of Seattle- Historic Preservation Office PO Box 94859 Seattle, WA 98124

**Subject: Sound Transit** 

West Seattle Link Extension Project

National Historic Preservation Act, Section 106

**Eligibility and Effects Determination** 

SHPO Project Tracking Code: 2019-02-01457

Dear Sarah Sodt:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulation (CFR) Part 800, for the West Seattle Link Extension Project (Project), formerly the West Seattle and Ballard Link Extensions Project. In August 2023 the Project was redefined to remove the Ballard Link Extension segment and revise the area of potential effect (APE). The Project will extend light rail service from SODO to West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction in King County, Washington. FTA requests feedback on the Section 106 Determinations of Eligibility and Effects for the Project.

## **Cultural Resources Evaluation**

A Historic and Archaeological Technical Report and Monitoring and Inadvertent Discovery Plan have been prepared for the Project (see Appendix A and Attachments A-F). This analysis included a review of available resources, including geologic mapping, the Washington Information System for Architectural and Archaeological Resources Database (WISAARD), the Washington Statewide Archaeology Predictive Model, ethnographic place names and village locations, historical-based archival records, Sanborn Maps, and previous cultural resources studies to assess the potential to encounter cultural resources within the project area, determine archaeological monitoring locations, and identify geoarchaeological testing areas. The West Seattle Link Extension

Geotechnical Investigations Project was proposed to support the ongoing design and environmental analysis for the West Seattle Link Extension Project, including geoarchaeological investigations of the project APE, but was reviewed as a separate federal undertaking (2023-12-08407) under Section 106 (see Appendix A- Attachments E and F). FTA determined the geotechnical and geoarchaeological investigations would have no effect to historic properties (December 2023) and SHPO concurred January 2024.

## **Archaeological Resources**

No known or documented archaeological resources are located within the areas of proposed ground disturbance and will not be impacted by the Project (see Appendix A and Attachments D - F). However, archaeological sensitive areas have been identified within the project APE based on proximity to known ethnographic locations, documented sites, and historic landforms. Archaeological monitoring of ground disturbing activities in areas considered a high probability for encountering resources will occur, including geoarchaeological testing. Results of the archaeological monitoring and geoarchaeological testing of archaeological sensitive areas will determine the need for additional subsurface investigations as the project moves forward through construction. This process will be further defined as we continue consultation to develop an agreement to resolve the adverse effects to historic properties for the project.

## **Historic Built Environment Resources**

FTA previously identified and evaluated 720 historic structures within the project APE (see Appendix A- Attachments A-C and F). Of these, 101 were determined eligible for listing to the NRHP. SHPO concurred with the determinations on eligibility for 95 properties and additional information was requested on six (September 2023). Since then, eight historic structures have been demolished, including one NRHP eligible property. In August of 2023 FTA revised the project APE and identified an additional 99 historic structures (see Appendix B). Of these, FTA has determined fifteen properties eligible for listing to the NRHP and revised the determinations on eligibility for the five previously inventoried historic properties evaluated in 2023. In total, seven NRHP eligible properties, including two Historic Districts along the preferred alternative will be adversely impacted by the project (see Appendix A- Attachments A-C and Appendix C), as identified in Table 1.

Table 1. Adverse Effects to NRHP Eligible Properties.

Historic Property Inventory ID	Property Name	Address	Adverse effect
720609	Graybar Electric Company Building	1919 6 <sup>th</sup> Avenue South	Property Demolition
Multiple	Spokane Street  Manufacturing Historic  District	Multiple	Property Demolition
720511	Acme Tool Works	3626 East Marginal Way South	Property Demolition
721620, 721624, 721625, 721628, 721629	Pacific Forge Company/ Bethlehem Steel Nut and Bolt Factory Historic District	3800 West Marginal Way Southwest	Property Demolition

342997	Alaskan Copper Company	2958 6 <sup>th</sup> Avenue	Property Demolition
	Employment Office	South	
721997	Auto Repair Garage	2958 6 <sup>th</sup> Avenue	Property Demolition
		South	
45978	Cettolin House	4022 32ns Avenue	Permanent Proximity
		Southwest	Effect

## **Determination of Effect and Request for Concurrence**

Based on results of the cultural resources analysis and assessment of historic built environment resources identified within the project APE (see Appendix A- Attachment A and Appendix B and C), FTA has made the following determinations:

- There are a total of 111 historic structures listed on, or eligible for listing to the NRHP located within the Project APE.
  - o 95- NRHP eligible properties previously evaluated (SHPO concurred 2023)
  - o 1- re-evaluated property determined NRHP eligible
  - o 15- new NRHP eligible properties
- The Project will result in adverse effects to seven NRHP eligible properties, including two historic districts.
- As such, the Project will have an Adverse Effect to Historic Properties.

Pursuant to 36 CFR Part 800, FTA requests comments on these determinations within 30 days of receipt of this letter. If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Erin Littauer at (206) 220-7521 or erin.littauer@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher Regional Administrator

Cc: Michael de Lange, City of Seattle Dennis Wardlaw, DAHP Maureen Elenga, DAHP Mark Assam, FTA Dezerae Hayes, Sound Transit Alex Stevenson, Sound Transit Lauren Swift, Sound Transit Jennifer Schreck, Sound Transit Cassandra Durkin, Sound Transit Enclosures: Appendix A- Historic and Archaeological Resources Technical Report; Attachments

- A. Table of Surveyed Properties
- B. Photographs of Historic Properties
- C. Built Environment Inventory Plan
- D. Archaeological Survey and Inventory Plan
- E. Geotechnical Investigation, Cultural Assessment, and Inadvertent Discovery Plan
- F. Agency and Tribal Consultation

Appendix B- 2024 Surveyed and Re-Evaluated Properties

Appendix C- Eligibility and Effects Maps



915 Second Avenue Federal Bldg. Suite 3192 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 18, 2024

Lisa Howard Executive Director Alliance for Pioneer Square PO Box 4507 Seattle, WA 98194

**Subject: Sound Transit** 

West Seattle Link Extension Project

National Historic Preservation Act, Section 106

**Eligibility and Effects Determination** 

SHPO Project Tracking Code: 2019-02-01457

#### Dear Lisa Howard:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulation (CFR) Part 800, for the West Seattle Link Extension Project (Project), formerly the West Seattle and Ballard Link Extensions Project. In August 2023 the Project was redefined to remove the Ballard Link Extension segment and revise the area of potential effect (APE). The Project will extend light rail service from SODO to West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction in King County, Washington. FTA requests feedback on the Section 106 Determinations of Eligibility and Effects for the Project.

## **Cultural Resources Evaluation**

A Historic and Archaeological Technical Report and Monitoring and Inadvertent Discovery Plan have been prepared for the Project (see Appendix A and Attachments A-F). This analysis included a review of available resources, including geologic mapping, the Washington Information System for Architectural and Archaeological Resources Database (WISAARD), the Washington Statewide Archaeology Predictive Model, ethnographic place names and village locations, historical-based archival records, Sanborn Maps, and previous cultural resources studies to assess the potential to encounter cultural resources within the project area, determine archaeological monitoring locations, and identify geoarchaeological testing areas. The West Seattle Link Extension

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# **Archaeological Resources**

No known or documented archaeological resources are located within the areas of proposed ground disturbance and will not be impacted by the Project (see Appendix A and Attachments D - F). However, archaeological sensitive areas have been identified within the project APE based on proximity to known ethnographic locations, documented sites, and historic landforms. Archaeological monitoring of ground disturbing activities in areas considered a high probability for encountering resources will occur, including geoarchaeological testing. Results of the archaeological monitoring and geoarchaeological testing of archaeological sensitive areas will determine the need for additional subsurface investigations as the project moves forward through construction. This process will be further defined as we continue consultation to develop an agreement to resolve the adverse effects to historic properties for the project.

# **Historic Built Environment Resources**

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Historic Property	Property Name	Address	Adverse effect
Inventory ID			
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	Building	South	
Multiple	Spokane Street	Multiple	Property Demolition
	Manufacturing Historic		
	District		
720511	Acme Tool Works	3626 East Marginal	Property Demolition
		Way South	
721620, 721624,	Pacific Forge Company/	3800 West	Property Demolition
721625, 721628,	Bethlehem Steel Nut	Marginal	
721629	and Bolt Factory	Way	
	Historic District	Southwest	

342997	Alaskan Copper Company	2958 6 <sup>th</sup> Avenue	Property Demolition
	Employment Office	South	
721997	Auto Repair Garage	2958 6 <sup>th</sup> Avenue	Property Demolition
		South	
45978	Cettolin House	4022 32ns Avenue	Permanent Proximity
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Based on results of the cultural resources analysis and assessment of historic built environment resources identified within the project APE (see Appendix A- Attachment A and Appendix B and C), FTA has made the following determinations:

- There are a total of 111 historic structures listed on, or eligible for listing to the NRHP located within the Project APE.
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- As such, the Project will have an Adverse Effect to Historic Properties.

Pursuant to 36 CFR Part 800, FTA requests comments on these determinations within 30 days of receipt of this letter. If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Erin Littauer at (206) 220-7521 or erin.littauer@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher Regional Administrator

Cc: Dennis Wardlaw, DAHP
Maureen Elenga, DAHP
Mark Assam, FTA
Dezerae Hayes, Sound Transit
Alex Stevenson, Sound Transit
Lauren Swift, Sound Transit
Jennifer Schreck, Sound Transit
Cassandra Durkin, Sound Transit

Enclosures: Appendix A- Historic and Archaeological Resources Technical Report; Attachments

- A. Table of Surveyed Properties
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Appendix B- 2024 Surveyed and Re-Evaluated Properties



915 Second Avenue Federal Bldg. Suite 3192 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 18, 2024

Chris Moore Preservation Programs Director Washington Trust for Historic Preservation 1204 Minor Avenue Seattle, WA 98101

**Subject: Sound Transit** 

West Seattle Link Extension Project

**National Historic Preservation Act, Section 106** 

**Eligibility and Effects Determination** 

SHPO Project Tracking Code: 2019-02-01457

#### Dear Chris Moore:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulation (CFR) Part 800, for the West Seattle Link Extension Project (Project), formerly the West Seattle and Ballard Link Extensions Project. In August 2023 the Project was redefined to remove the Ballard Link Extension segment and revise the area of potential effect (APE). The Project will extend light rail service from SODO to West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction in King County, Washington. FTA requests feedback on the Section 106 Determinations of Eligibility and Effects for the Project.

# **Cultural Resources Evaluation**

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# **Archaeological Resources**

No known or documented archaeological resources are located within the areas of proposed ground disturbance and will not be impacted by the Project (see Appendix A and Attachments D - F). However, archaeological sensitive areas have been identified within the project APE based on proximity to known ethnographic locations, documented sites, and historic landforms. Archaeological monitoring of ground disturbing activities in areas considered a high probability for encountering resources will occur, including geoarchaeological testing. Results of the archaeological monitoring and geoarchaeological testing of archaeological sensitive areas will determine the need for additional subsurface investigations as the project moves forward through construction. This process will be further defined as we continue consultation to develop an agreement to resolve the adverse effects to historic properties for the project.

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Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher Regional Administrator

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Mark Assam, FTA
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Appendix B- 2024 Surveyed and Re-Evaluated Properties



915 Second Avenue Federal Bldg. Suite 3192 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 18, 2024

Leonard Forsman Chairman Suquamish Indian Tribe of the Port Madison Reservation PO Box 498 Suquamish, WA 98392

**Subject: Sound Transit** 

**West Seattle Link Extension Project** 

**National Historic Preservation Act, Section 106** 

**Eligibility and Effects Determination** 

SHPO Project Tracking Code: 2019-02-01457

#### Dear Chairman Forsman:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulation (CFR) Part 800, for the West Seattle Link Extension Project (Project), formerly the West Seattle and Ballard Link Extensions Project. In August 2023 the Project was redefined to remove the Ballard Link Extension segment and revise the area of potential effect (APE). The Project will extend light rail service from SODO to West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction in King County, Washington. FTA requests feedback on the Section 106 Determinations of Eligibility and Effects for the Project.

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Sincerely,

Susan K. Fletcher Regional Administrator

Cc: Stephanie Trudel, THPO, Suquamish Dennis Wardlaw, DAHP
Maureen Elenga, DAHP
Mark Assam, FTA
Dezerae Hayes, Sound Transit
Alex Stevenson, Sound Transit
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915 Second Avenue Federal Bldg. Suite 3192 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 18, 2024

Robert de los Angeles Chairman Snoqualmie Indian Tribe PO Box 969 Snoqualmie, WA 98065

**Subject: Sound Transit** 

**West Seattle Link Extension Project** 

**National Historic Preservation Act, Section 106** 

**Eligibility and Effects Determination** 

SHPO Project Tracking Code: 2019-02-01457

Dear Chairman de los Angeles:

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## Archaeological Resources

No known or documented archaeological resources are located within the areas of proposed ground disturbance and will not be impacted by the Project (see Appendix A and Attachments D - F). However, archaeological sensitive areas have been identified within the project APE based on proximity to known ethnographic locations, documented sites, and historic landforms. Archaeological monitoring of ground disturbing activities in areas considered a high probability for encountering resources will occur, including geoarchaeological testing. Results of the archaeological monitoring and geoarchaeological testing of archaeological sensitive areas will determine the need for additional subsurface investigations as the project moves forward through construction. This process will be further defined as we continue consultation to develop an agreement to resolve the adverse effects to historic properties for the project.

# **Historic Built Environment Resources**

FTA previously identified and evaluated 720 historic structures within the project APE (see Appendix A- Attachments A-C and F). Of these, 101 were determined eligible for listing to the NRHP. SHPO concurred with the determinations on eligibility for 95 properties and additional information was requested on six (September 2023). Since then, eight historic structures have been demolished, including one NRHP eligible property. In August of 2023 FTA revised the project APE and identified an additional 99 historic structures (see Appendix B). Of these, FTA has determined fifteen properties eligible for listing to the NRHP and revised the determinations on eligibility for the five previously inventoried historic properties evaluated in 2023. In total, seven NRHP eligible properties, including two Historic Districts along the preferred alternative will be adversely impacted by the project (see Appendix A- Attachments A-C and Appendix C), as identified in Table 1.

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Inventory ID			
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	Building	South	
Multiple	Spokane Street	Multiple	Property Demolition
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720511	Acme Tool Works	3626 East Marginal	Property Demolition
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721620, 721624,	Pacific Forge Company/	3800 West	Property Demolition
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721629	and Bolt Factory	Way	

	Historic District	Southwest	
342997	Alaskan Copper Company	2958 6 <sup>th</sup> Avenue	Property Demolition
	Employment Office	South	
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45978	Cettolin House	4022 32ns Avenue	Permanent Proximity
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Based on results of the cultural resources analysis and assessment of historic built environment resources identified within the project APE (see Appendix A- Attachment A and Appendix B and C), FTA has made the following determinations:

- There are a total of 111 historic structures listed on, or eligible for listing to the NRHP located within the Project APE.
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- As such, the Project will have an **Adverse Effect to Historic Properties**.

Pursuant to 36 CFR Part 800, FTA requests comments on these determinations within 30 days of receipt of this letter. If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Erin Littauer at (206) 220-7521 or erin.littauer@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher Regional Administrator

Cc: Steven Moses, Snoqualmie Indian Tribe
Dennis Wardlaw, DAHP
Maureen Elenga, DAHP
Mark Assam, FTA
Dezerae Hayes, Sound Transit
Alex Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Lauren Swift, Sound Transit
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Enclosures: Appendix A- Historic and Archaeological Resources Technical Report; Attachments

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Appendix B- 2024 Surveyed and Re-Evaluated Properties



915 Second Avenue Federal Bldg. Suite 3192 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 18, 2024

Teri Gobin Chair Tulalip Tribes of Washington 6406 Marine Drive Tulalip, WA 98271

**Subject: Sound Transit** 

**West Seattle Link Extension Project** 

National Historic Preservation Act, Section 106

**Eligibility and Effects Determination** 

SHPO Project Tracking Code: 2019-02-01457

#### Dear Chair Gobin:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulation (CFR) Part 800, for the West Seattle Link Extension Project (Project), formerly the West Seattle and Ballard Link Extensions Project. In August 2023 the Project was redefined to remove the Ballard Link Extension segment and revise the area of potential effect (APE). The Project will extend light rail service from SODO to West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction in King County, Washington. FTA requests feedback on the Section 106 Determinations of Eligibility and Effects for the Project.

#### **Cultural Resources Evaluation**

A Historic and Archaeological Technical Report and Monitoring and Inadvertent Discovery Plan have been prepared for the Project (see Appendix A and Attachments A-F). This analysis included a review of available resources, including geologic mapping, the Washington Information System for Architectural and Archaeological Resources Database (WISAARD), the Washington Statewide Archaeology Predictive Model, ethnographic place names and village locations, historical-based archival records, Sanborn Maps, and previous cultural resources studies to assess the potential to encounter cultural resources within the project area, determine archaeological monitoring

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45978	Cettolin House	4022 32ns Avenue	Permanent Proximity
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Based on results of the cultural resources analysis and assessment of historic built environment resources identified within the project APE (see Appendix A- Attachment A and Appendix B and C), FTA has made the following determinations:

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Pursuant to 36 CFR Part 800, FTA requests comments on these determinations within 30 days of receipt of this letter. If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Erin Littauer at (206) 220-7521 or erin.littauer@dot.gov.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher Regional Administrator

Cc: Richard Young, Tulalip Tribe
Dennis Wardlaw, DAHP
Maureen Elenga, DAHP
Mark Assam, FTA
Dezerae Hayes, Sound Transit
Alex Stevenson, Sound Transit
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Appendix B- 2024 Surveyed and Re-Evaluated Properties



915 Second Avenue Federal Bldg. Suite 3192 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 18, 2024

Gerald Lewis Chairman Confederated Tribes and Bands of the Yakama Nation PO Box 151 Toppenish, WA 98948

**Subject: Sound Transit** 

**West Seattle Link Extension Project** 

National Historic Preservation Act, Section 106

**Eligibility and Effects Determination** 

SHPO Project Tracking Code: 2019-02-01457

#### Dear Chairman Lewis:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulation (CFR) Part 800, for the West Seattle Link Extension Project (Project), formerly the West Seattle and Ballard Link Extensions Project. In August 2023 the Project was redefined to remove the Ballard Link Extension segment and revise the area of potential effect (APE). The Project will extend light rail service from SODO to West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction in King County, Washington. FTA requests feedback on the Section 106 Determinations of Eligibility and Effects for the Project.

#### **Cultural Resources Evaluation**

A Historic and Archaeological Technical Report and Monitoring and Inadvertent Discovery Plan have been prepared for the Project (see Appendix A and Attachments A-F). This analysis included a review of available resources, including geologic mapping, the Washington Information System for Architectural and Archaeological Resources Database (WISAARD), the Washington Statewide Archaeology Predictive Model, ethnographic place names and village locations, historical-based archival records, Sanborn Maps, and previous cultural resources studies to assess the potential to encounter cultural resources within the project area, determine archaeological monitoring

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Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher Regional Administrator

Cc: Casey Barney, Yakama Nation
Dennis Wardlaw, DAHP
Maureen Elenga, DAHP
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915 Second Avenue Federal Bldg. Suite 3192 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 18, 2024

Jaison Elkins Chairman Muckleshoot Indian Tribe 39015 172<sup>nd</sup> Avenue SE Auburn, WA 98092

**Subject: Sound Transit** 

**West Seattle Link Extension Project** 

**National Historic Preservation Act, Section 106** 

**Eligibility and Effects Determination** 

SHPO Project Tracking Code: 2019-02-01457

#### Dear Chairman Elkins:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulation (CFR) Part 800, for the West Seattle Link Extension Project (Project), formerly the West Seattle and Ballard Link Extensions Project. In August 2023 the Project was redefined to remove the Ballard Link Extension segment and revise the area of potential effect (APE). The Project will extend light rail service from SODO to West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction in King County, Washington. FTA requests feedback on the Section 106 Determinations of Eligibility and Effects for the Project.

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	Historic District	Southwest	
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Cc: Warren KingGeorge, Muckleshoot Tribe Laura Murphy, Muckleshoot Tribe Dennis Wardlaw, DAHP Maureen Elenga, DAHP Mark Assam, FTA Dezerae Hayes, Sound Transit Alex Stevenson, Sound Transit Jennifer Schreck, Sound Transit

# Lauren Swift, Sound Transit Cassandra Durkin, Sound Transit

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Appendix B- 2024 Surveyed and Re-Evaluated Properties



915 Second Avenue Federal Bldg. Suite 3192 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 18, 2024

Eric White Chairman Stillaguamish Tribe of Indians of Washington PO Box 277 Arlington, WA 98223

**Subject: Sound Transit** 

**West Seattle Link Extension Project** 

National Historic Preservation Act, Section 106

**Eligibility and Effects Determination** 

SHPO Project Tracking Code: 2019-02-01457

#### Dear Chairman White:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulation (CFR) Part 800, for the West Seattle Link Extension Project (Project), formerly the West Seattle and Ballard Link Extensions Project. In August 2023 the Project was redefined to remove the Ballard Link Extension segment and revise the area of potential effect (APE). The Project will extend light rail service from SODO to West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction in King County, Washington. FTA requests feedback on the Section 106 Determinations of Eligibility and Effects for the Project.

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Cc: Kerry Lyste, Stillaguamish Tribe Dennis Wardlaw, DAHP Maureen Elenga, DAHP Mark Assam, FTA Dezerae Hayes, Sound Transit Alex Stevenson, Sound Transit Jennifer Schreck, Sound Transit Lauren Swift, Sound Transit Cassandra Durkin, Sound Transit Enclosures: Appendix A- Historic and Archaeological Resources Technical Report; Attachments

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915 Second Avenue Federal Bldg. Suite 3192 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

March 22, 2024

Allyson Brooks, Ph.D.
State Historic Preservation Officers
Washington State Department of Archaeology and Historic Preservation
PO Box 48343
Olympia, Washington 98504-8343

**Subject: Sound Transit** 

West Seattle Link Extension Project

**National Historic Preservation Act, Section 106** 

**Eligibility and Effects Determination** 

SHPO Project Tracking Code: 2019-02-01457

Dear Dr. Brooks:

The Federal Transit Administration (FTA), in cooperation with Sound Transit, is continuing consultation under Section 106 of the National Historic Preservation Act and its implementing regulations at 36 Code of Federal Regulation (CFR) Part 800, for the West Seattle Link Extension Project (Project), formerly the West Seattle and Ballard Link Extensions Project. In August 2023 the Project was redefined to remove the Ballard Link Extension segment and revise the area of potential effect (APE). The Project will extend light rail service from SODO to West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction in King County, Washington. FTA requests concurrence from the Washington State Historic Preservation Officer (SHPO) with the Section 106 Determinations on Eligibility and Effects for the Project.

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A Historic and Archaeological Technical Report and Monitoring and Inadvertent Discovery Plan have been prepared for the Project (see Appendix A and Attachments A-F). This analysis included a review of available resources, including geologic mapping, the Washington Information System for Architectural and Archaeological Resources Database (WISAARD), the Washington Statewide Archaeology Predictive Model, ethnographic place names and village locations, historical-based archival records, Sanborn Maps, and previous cultural resources studies to assess the potential to

encounter cultural resources within the project area, determine archaeological monitoring locations, and identify geoarchaeological testing areas. The West Seattle Link Extension Geotechnical Investigations Project was proposed to support the ongoing design and environmental analysis for the West Seattle Link Extension Project, including geoarchaeological investigations of the project APE, but was reviewed as a separate federal undertaking (2023-12-08407) under Section 106 (see Appendix A- Attachments E and F). FTA determined the geotechnical and geoarchaeological investigations would have no effect to historic properties (December 2023) and SHPO concurred January 2024.

# Archaeological Resources

No known or documented archaeological resources are located within the areas of proposed ground disturbance and will not be impacted by the Project (see Appendix A and Attachments D - F). However, archaeological sensitive areas have been identified within the project APE based on proximity to known ethnographic locations, documented sites, and historic landforms. Archaeological monitoring of ground disturbing activities in areas considered a high probability for encountering resources will occur, including geoarchaeological testing. Results of the archaeological monitoring and geoarchaeological testing of archaeological sensitive areas will determine the need for additional subsurface investigations as the project moves forward through construction. This process will be further defined as we continue consultation to develop an agreement to resolve the adverse effects to historic properties for the project.

## **Historic Built Environment Resources**

FTA previously identified and evaluated 720 historic structures within the project APE (see Appendix A- Attachments A-C and F). Of these, 101 were determined eligible for listing to the NRHP. SHPO concurred with the determinations on eligibility for 95 properties and additional information was requested on six (September 2023). Since then, eight historic structures have been demolished, including one NRHP eligible property. In August of 2023 FTA revised the project APE and identified an additional 99 historic structures (see Appendix B). Of these, FTA has determined fifteen properties eligible for listing to the NRHP and revised the determinations on eligibility for the five previously inventoried historic properties evaluated in 2023. In total, seven NRHP eligible properties, including two Historic Districts along the preferred alternative will be adversely affected by the project (see Appendix A- Attachments A-C and Appendix C), as identified in Table 1.

Historic Property	Property Name	Address	Adverse Effects
Inventory ID			
720609	Graybar Electric Company	1919 6 <sup>th</sup> Avenue	Property Demolition
	Building	South	
Multiple	Spokane Street	Multiple	Property Demolition
	Manufacturing Historic		
	District		
720511	Acme Tool Works	3626 East Marginal	Property Demolition
		Way South	
721620, 721624,	Pacific Forge Company/	3800 West	Property Demolition
721625, 721628,	Bethlehem Steel Nut	Marginal	

721629	and Bolt Factory	Way	
	Historic District	Southwest	
342997	Alaskan Copper Company	2958 6 <sup>th</sup> Avenue	Property Demolition
	Employment Office	South	
721997	Auto Repair Garage	2958 6 <sup>th</sup> Avenue	Property Demolition
		South	
45978	Cettolin House	4022 32ns Avenue	Permanent Proximity
		Southwest	Effect

Based on results of the cultural resources analysis and assessment of historic built environment resources identified within the project APE (see Appendix A- Attachment A; Appendix B and D-E), FTA has made the following determinations:

- There are a total of 111 historic structures listed on, or eligible for listing to the NRHP located within the Project APE.
  - o 95- NRHP eligible properties previously evaluated (SHPO concurred 2023)
  - o 1- re-evaluated property determined NRHP eligible
  - o 15- new NRHP eligible properties
- The Project will result in adverse effects to seven NRHP eligible properties, including two historic districts.
- As such, the Project will have an Adverse Effect to Historic Properties.

Pursuant to 36 CFR Part 800, FTA is seeking SHPO concurrence with these determinations (see Appendix D and E) within 30 days of receipt of this letter.

# **Section 4(f) Coordination**

Under Section 4(f) of the Department of Transportation Act of 1966 (Section 4(f)), and pursuant to 23 CFR part 774, SHPO is the Section 4(f) Official with Jurisdiction for the historic properties affected by the Project. As a result, FTA is required to consult with SHPO prior to making its final Section 4(f) determinations for the Project. In making these Section 106 effects determinations for these properties, FTA is also considering findings of de minimis impact under Section 4(f) for 3 historic properties (Fire Station 14, Langendorf United Bakeries, and Langendorf United Bakeries Repair Garage) that would experience partial acquisitions as a result of the Project, but no adverse effect under Section 106. Consistent with 23 CFR Part 774.5, this letter serves as notification to SHPO that FTA intends to use SHPO's written concurrence with the enclosed Section 106 no adverse effect determinations for these 3 properties to reach Section 4(f) de minimis impact determinations.

If FTA can provide any assistance or additional information to aid in your prompt reply, please contact Erin Littauer at (206) 220-7521 or <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>.

Thank you for your consultation on the Project.

Sincerely,

Susan K. Fletcher Regional Administrator

Cc: Dennis Wardlaw, DAHP
Maureen Elenga, DAHP
Mark Assam, FTA
Dezerae Hayes, Sound Transit
Alex Stevenson, Sound Transit
Lauren Swift, Sound Transit
Jennifer Schreck, Sound Transit
Cassandra Durkin, Sound Transit

Enclosures: Appendix A- Historic and Archaeological Resources Technical Report; Attachments

- A. Table of Surveyed Properties
- B. Photographs of Historic Properties
- C. Built Environment Inventory Plan
- D. Archaeological Survey and Inventory Plan
- E. Geotechnical Investigation, Cultural Assessment, and Inadvertent Discovery Plan
- F. Agency and Tribal Consultation

Appendix B- 2024 Surveyed and Re-Evaluated Properties

Appendix C- Eligibility and Effects Maps

Appendix D- NRHP Eligibility Determinations and Concurrence Tracking Sheet

Appendix E- Informal Consultation: NRHP Eligibility Determinations Tracking



April 11, 2024

Susan Fletcher Regional Administrator Federal Transit Administration 915 Second Avenue Federal Bldg. Suite 3192 Seattle, WA98174-1002

In future correspondence please refer to: Project Tracking Code: 2019-02-01457

Property: King County West Seattle to Ballard Light Rail Extension

Re: Adverse Effect

#### Dear Susan Fletcher:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. This action has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your communication: Sound Transit West Seattle Link Extension Project National Historic Preservation Act, Section 106 Eligibility and Effects Determination.

First, we concur that the following properties are eligible for listing in the National Register of Historic Places:

- Property ID: 721984 Cettolin House 4022 32nd Ave SW, Seattle, Washington, 98126
- Property ID: 721997 Auto Repair Garage 2958 6th Ave S, Seattle, Washington, 98134
- Property ID: 342997 Alaskan Copper Co. Employment Office 2958 6th Ave S, Seattle, Washington, 98134
- Property ID: 721629 Pacific Coast Forge Company/Bethlehem Steel Nut and Bolt Factory East Warehouse 3800 W Marginal Way SW, Seattle, Washington, 98106
- Property ID: 721620 Pacific Coast Forge Company/Bethlehem Steel Nut and Bolt Factory Office
- Property ID: 721624 Pacific Coast Forge Company/Bethlehem Steel Nut and Bolt Factory Pacific Coast Forge building
- Property ID: 721625 Pacific Coast Forge Company/Bethlehem Steel Nut and Bolt Factory North Warehouse
- Property ID: 721628 Pacific Coast Forge Company/Bethlehem Steel Nut and Bolt Factory South Warehouse
- Property ID: 720511 Acme Tool Works 3626 E Marginal Way S, Seattle, Washington, 98134
- Property ID: 720609 Graybar Electric Company Building 1919 6th Ave S, Seattle, Washington, 98134



- Property ID: 342293 Edwards Ice Machine Co./Eagle Metals Co. 3628 E Marginal Way S, Seattle, Washington, 98134
- Property ID: 344500 The Simmons Company Metal Beds, Springs & Mattress Warehouse 99
   S Spokane St, Seattle, Washington, 98134
- Property ID: 720482 Nelson Iron Works Blacksmith & Machinist Shop 45 S Spokane St, Seattle, WA, 98134
- Property ID: 720511 Acme Tool Works 3626 E Marginal Way S, Seattle, WA, 98134
- Property ID: 720513 Lindmark Machine Works 3626 E Marginal Way S, Seattle, WA, 98134
- Property ID: 340118 Lindmark Machine Works 49 S Spokane St, Seattle, Washington, 98134
- Property ID: 38527 Air Reduction Company 3623 E Marginal Way S, Seattle, WA 98134
- Property ID: 720564 Air Reduction Company Carbide Storage Building 3621 E Marginal Way S, Seattle, WA, 98134
- Property ID: 720563 Air Reduction Company Auto Repair Garage 3621 E Marginal Way S, Seattle, WA, 98134
- Property ID: 38525 Puget Sound Sheet Metal Works 3651 E Marginal Way S, Seattle, Washington
- Property ID: 720542 Light Industrial Building 3633 E Marginal Way S, Seattle, WA, 98134
- Property ID: 38533 A. M. Castle and Company Steel 3640-60 E Marginal Way S, Seattle, WA 98134

We also concur that the project as proposed will have an adverse effect on the above referenced resources listed in, or eligible for listing in, the National Register of Historic Places due to their anticipated demolition, or permanent proximity effect and diminishment of Setting for Property ID: 721984 Cettolin House and Property ID: 38533 A. M. Castle and Company Steel, respectively.

Given our adverse effect determination, we look forward to working with you to mitigate the adverse effect through the development of a Programmatic Agreement (PA).

Also, we appreciate the outreach conducted so far by your agency and Sound Transit. We would like to request a meeting to review in further detail the geoarchaeological work completed to date and to discuss future steps as they relate to the archaeological treatment plan that will be part of the PA.

Finally, we appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult for this project. Our comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in conformance with Section 106.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely.

Maureen Elenga, M.A. Transportation Reviewer

(360) 972-4539

Maureen.Elenga@dahp.wa.gov





April 16, 2024

Susan Fletcher Regional Administrator Federal Transit Administration 915 Second Avenue Federal Bldg. Suite 3192 Seattle, WA98174-1002

In future correspondence please refer to: Project Tracking Code: 2019-02-01457

Property: King County\_ West Seattle to Ballard Light Rail Extension

Re: Adverse Effect

Dear Susan Fletcher:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. This action has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your communication: Sound Transit West Seattle Link Extension Project National Historic Preservation Act, Section 106 Eligibility and Effects Determination.

First, we concur that the following properties are eligible for listing in the National Register of Historic Places (NRHP):

- Property ID: 721984 Cettolin House 4022 32nd Ave SW, Seattle, Washington, 98126
- Property ID: 721997 Auto Repair Garage 2958 6th Ave S, Seattle, Washington, 98134
- Property ID: 342997 Alaskan Copper Co. Employment Office 2958 6th Ave S, Seattle, Washington, 98134
- Property ID: 720609 Graybar Electric Company Building 1919 6th Ave S, Seattle, Washington, 98134

We also concur that the following properties are contributing resources to the NRHP-eligible Pacific Coast Forge Company/Bethlehem Steel Nut and Bolt Factory Historic District, but are not individually eligible:

- Property ID: 721629 Pacific Coast Forge Company/Bethlehem Steel Nut and Bolt Factory East Warehouse 3800 W Marginal Way SW, Seattle, Washington, 98106
- Property ID: 721620 Pacific Coast Forge Company/Bethlehem Steel Nut and Bolt Factory Office
- Property ID: 721624 Pacific Coast Forge Company/Bethlehem Steel Nut and Bolt Factory Pacific Coast Forge building



- Property ID: 721625 Pacific Coast Forge Company/Bethlehem Steel Nut and Bolt Factory North Warehouse
- Property ID: 721628 Pacific Coast Forge Company/Bethlehem Steel Nut and Bolt Factory South Warehouse

We also concur that the following properties are both individually eligible and contributing resources to the NRHP-eligible Spokane Street Manufacturing Historic District:

- Property ID: 720511 Acme Tool Works 3626 E Marginal Way S, Seattle, WA 98134
- Property ID: 38533 A. M. Castle and Company Steel 3640-60 E Marginal Way S, Seattle, WA 98134

We also concur that the following properties contribute to the NRHP-eligible Spokane Street Manufacturing Historic District but are not individually eligible:

- Property ID: 342293 Edwards Ice Machine Co./Eagle Metals Co. 3628 E Marginal Way S, Seattle, WA 98134
- Property ID: 344500 The Simmons Company Metal Beds, Springs & Mattress Warehouse 99 S Spokane St. Seattle. WA 98134
- Property ID: 720482 Nelson Iron Works Blacksmith & Machinist Shop 45 S Spokane St, Seattle, WA 98134
- Property ID: 720513 Lindmark Machine Works 3626 E Marginal Way S, Seattle, WA 98134
- Property ID: 340118 Lindmark Machine Works 49 S Spokane St, Seattle, WA 98134
- Property ID: 38527 Air Reduction Company 3623 E Marginal Way S, Seattle, WA 98134
- Property ID: 720564 Air Reduction Company Carbide Storage Building 3621 E Marginal Way S, Seattle, WA 98134
- Property ID: 720563 Air Reduction Company Auto Repair Garage 3621 E Marginal Way S, Seattle, WA 98134
- Property ID: 38525 Puget Sound Sheet Metal Works 3651 E Marginal Way S, Seattle, WA
- Property ID: 720542 Light Industrial Building 3633 E Marginal Way S, Seattle, WA 98134

We also concur that the project as currently proposed will have no adverse effect on the following properties:

- Property ID: 720482 Nelson Iron Works Blacksmith & Machinist Shop 45 S Spokane St, Seattle, WA 98134
- Property ID: 340118 Lindmark Machine Works 49 S Spokane St, Seattle, WA 98134
- Property ID: 38525 Puget Sound Sheet Metal Works 3651 E Marginal Way S, Seattle, WA
- All properties listed on the Appendix D Eligibility Determinations Concurrence Tracking spreadsheet provided by FTA that are not detailed above.

We also concur that the project as currently proposed will have an adverse effect on the following resources due to their anticipated demolition:

- All contributing resources to the Pacific Coast Forge Company/Bethlehem Steel Nut and Bolt Factory Historic District
- Property ID: 721997 Auto Repair Garage 2958 6th Ave S, Seattle, WA 98134
- Property ID: 342997 Alaskan Copper Co. Employment Office 2958 6th Ave S, Seattle, WA 98134
- Property ID: 720609 Graybar Electric Company Building 1919 6th Ave S, Seattle, WA 98134
- Property ID: 342293 Edwards Ice Machine Co./Eagle Metals Co. 3628 E Marginal Way S,



Seattle, WA 98134

- Property ID: 344500 The Simmons Company Metal Beds, Springs & Mattress Warehouse 99
   S Spokane St, Seattle, WA 98134
- Property ID: 720511 Acme Tool Works 3626 E Marginal Way S, Seattle, WA, 98134
- Property ID: 720513 Lindmark Machine Works 3626 E Marginal Way S, Seattle, WA, 98134
- Property ID: 38527 Air Reduction Company 3623 E Marginal Way S, Seattle, WA 98134
- Property ID: 720564 Air Reduction Company Carbide Storage Building 3621 E Marginal Way S, Seattle, WA 98134
- Property ID: 720563 Air Reduction Company Auto Repair Garage 3621 E Marginal Way S, Seattle, WA 98134
- Property ID: 720542 Light Industrial Building 3633 E Marginal Way S, Seattle, WA 98134

Finally, we concur that the project as currently proposed will have and adverse effect on the following properties due to permanent proximity/diminishment of setting:

- Property ID: 721984 Cettolin House 4022 32nd Ave SW, Seattle, WA 98126
- Property ID: 38533 A. M. Castle and Company Steel 3640-60 E Marginal Way S, Seattle, WA 98134

Given our adverse effect determination, we look forward to working with you to mitigate the adverse effect through the development of a Programmatic Agreement (PA).

Also, we appreciate the outreach conducted so far by your agency and Sound Transit. We would like to request a meeting to review in further detail the geoarchaeological work completed to date and to discuss future steps as they relate to the archaeological treatment plan that will be part of the PA.

Finally, we appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult for this project. Our comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in conformance with Section 106.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,

Maureen Elenga, M.A. Transportation Reviewer (360) 972-4539 Maureen.Elenga@dahp.wa.gov



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### Yellin, Michelle

From: Stevenson, Alex <alex.stevenson@soundtransit.org>

**Sent:** Tuesday, April 16, 2024 8:45 PM

To: Gray, Connie; Yellin, Michelle; Bundy, Barbara; Swank, Alisa

**Subject:** [EXTERNAL] FW: WSLE Project Management

I just realized I hadn't shared this with you guys.

Alex E. Stevenson

Manager - Cultural Resources Sound Transit Mobile: 206-419-5315

Pronouns: He/Him/His

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From: Wardlaw, Dennis (DAHP) < Dennis.Wardlaw@dahp.wa.gov>

Sent: Friday, April 12, 2024 9:57 AM

To: Assam, Mark (FTA) <mark.assam@dot.gov>; Littauer, Erin (FTA) <erin.littauer@dot.gov>; Stevenson, Alex

<alex.stevenson@soundtransit.org>; Schreck, Jennifer <jennifer.schreck@soundtransit.org>

**Cc:** Elenga, Maureen (DAHP) < Maureen. Elenga@dahp.wa.gov>

Subject: WSLE Project Management

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Hello FTA and ST Partners,

Just wanted to give you a heads up on some housekeeping we are doing for the West Seattle project. Today we merged the 2018 West Seattle project with the 2019 project. Moving forward, any submittals for the WSLE project should only be done through the 2019 tracking code (2019-02-01457).

We also had a discussion with our WISSARD guru Annie Strader about how to handle the future Ballard Link extension. When ST and FTA have reached a point where the new APE is ready to be formally submied, an APE shapefile should be sent to DAHP. The shapefile will allow DAHP staff to capture and migrate the HPIs to the new project. We believe this will help reduce further complicaons of our (and your) administrative records. However, please note that migrating the material to the future project will take some additional me on our end, so that should be factored in with the APE submial.

Thanks, and please do not hesitate to contact me if you have any questions or want to discuss this further.

Dennis Wardlaw, M.A.
Transportation Archaeologist
Dept. of Archaeology and Historic Preservation

1110 Capitol Way South, Suite 30

Olympia, WA 98501 Phone: 360-485-5014

please consider the environment before printing this email

## Yellin, Michelle

From: Stevenson, Alex <alex.stevenson@soundtransit.org>

**Sent:** Wednesday, April 17, 2024 11:25 AM **To:** Yellin, Michelle; Sasha Visconty

Subject: FW: [EXTERNAL] West Seattle Link Extension (WSLE) Project- Section 106

Consultation-Determination of Eligibility and Effects

#### For the logs

Alex E. Stevenson

Manager - Cultural Resources

Sound Transit Mobile: 206-419-5315

Pronouns: He/Him/His

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From: Littauer, Erin (FTA) <erin.littauer@dot.gov>

Sent: Wednesday, April 17, 2024 7:41 AM

To: Stevenson, Alex <alex.stevenson@soundtransit.org>

Cc: Ann Costanza <acostanza@anchorqea.com>

Subject: RE: [EXTERNAL] West Seattle Link Extension (WSLE) Project- Section 106 Consultation-Determination of

**Eligibility and Effects** 

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Hi Alex,

See below reference comments from the Suquamish, including a correction to ethnographic discussion in Section 4 and reference to Chief Seattle. Please update this information as requested.

Thanks

Erin

**From:** Littauer, Erin (FTA)

Sent: Wednesday, April 17, 2024 7:38 AM

To: Stephanie Trudel <strudel@Suquamish.nsn.us>

Cc: Iforsman suguamish.nsn.us < Iforsman@suguamish.nsn.us >

Subject: RE: [EXTERNAL] West Seattle Link Extension (WSLE) Project- Section 106 Consultation-Determination of

Eligibility and Effects

Hi Stephanie,

Thank you for your response and the information regarding correction to Section 4. We will share this information with Sound Transit to address these changes.

Thank you and please let me know if you have any additional comments or questions.

From: Stephanie Trudel < <a href="mailto:strudel@Suquamish.nsn.us">strudel@Suquamish.nsn.us</a>>

Sent: Tuesday, April 16, 2024 3:20 PM

To: Littauer, Erin (FTA) < <a href="mailto:crin.littauer@dot.gov">crin.littauer@dot.gov</a>>

Cc: Iforsman suquamish.nsn.us < <a href="mailto:lforsman@suquamish.nsn.us">lforsman@suquamish.nsn.us</a>>

Subject: RE: [EXTERNAL] West Seattle Link Extension (WSLE) Project- Section 106 Consultation-Determination of

**Eligibility and Effects** 

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Erin,

Thank you for the continuing consultation with the Suquamish Tribe regarding the West Seattle Link Extension Project. The Suquamish Tribe's Archaeology and Historic Preservation Program concurs with FTA's determination that the Project will have an Adverse Effect to Historic Properties. We look forward to working with FTA and Sound Transit on the Programmatic Agreement.

We ask for a correction be made to the *West Seattle Link Extension Historic and Archaeological Resources Technical Report* in Appendix A. In Section 4.4 Ethnographic Context on page 4-6, Chief Seattle is referred to as Duwamish only. Chief Seattle was both Duwamish and Suquamish. Chief Seattle had a Suquamish father and Duwamish mother, and Chief Seattle told Catherine Maynard, Dr. David Maynard's wife, that he was born on Blake Island, in a house built by his father. Chief Seattle signed the Treaty of Point Elliott in 1855 on behalf of both the Suquamish and Duwamish people. There are numerous direct references to Seattle in Hudson's Bay Company records between 1833 and 1846, and all references to his tribe state Seattle was Suquamish. Chief Seattle chose to spend his final days living at Old Man House village, a major Suquamish winter village in the heart of Suquamish territory, and is buried in the Suquamish cemetery.

Thank you for making this important correction to the report.

Sincerely, Stephanie

Stephanie Trudel Tribal Historic Preservation Officer Suquamish Tribe PO Box 498 Suquamish, WA 98392-0498 360-394-8533 strudel@suquamish.nsn.us

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>

Sent: Friday, March 22, 2024 1:15 PM

To: Leonard Forsman < lforsman@suguamish.nsn.us>

Cc: Fletcher, Susan (FTA) < susan.fletcher@dot.gov >; Assam, Mark (FTA) < Mark.Assam@dot.gov >; Rastelli, Scot (FTA) < Scot.Rastelli@dot.gov >; Wardlaw, Dennis (DAHP) < dennis.wardlaw@dahp.wa.gov >; maureen.elenga@dahp.wa.gov; dezerae.hayes@soundtransit.org; alex.stevenson@soundtransit.org; lauren.swift@soundtransit.org; Stephanie Trudel < strudel@Suquamish.nsn.us >; Schreck, Jennifer < jennifer.schreck@soundtransit.org >; Durkin, Cassandra < cassandra.durkin@soundtransit.org >

**Subject:** [EXTERNAL] West Seattle Link Extension (WSLE) Project- Section 106 Consultation-Determination of Eligibility and Effects

Dear Chairman Forsman,

Please see the attached Section 106 consultation for the Sound Transit- West Seattle Link Extension (WSLE) Project. Due to file size constraints, related documents are located on a Secure FTP site (see below). Please let me know if you have any difficulty accessing these files.

URL:

https://link.zixcentral.com/u/e8f4a3f5/DNRrAYno7hGkTV64hnsoMg?u=https%3A%2F%2Fftp.anchorqea.com%2Faq

Username: <u>170036-01.01\_05b@170036-01.01\_05b</u>

Password: Sound2021!

Thank you,

Erin Littauer
Environmental Protection Specialist
Federal Transit Administration- Region 10
U.S. Department of Transportation
Erin.littauer@dot.gov | www.transit.dot.gov

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## dxwdaw?abš

4/17/2024

Sound Transit 401 S Jackson St, Seattle, WA 98104 West Seattle Link Extension

Dear Alex Stevenson,

Thank you for the opportunity to comment on the West Seattle Link Extension to provide fast, reliable light rail connections to dense residential and job centers in the SODO, Delridge and West Seattle neighborhoods. Based on the information provided and our understanding of the project and its APE, the Duwamish Tribe considers the location culturally significant and has a moderate to high probability to have unknown archaeological deposits. We note that there are 11 historical and ancestral Duwamish place names (usual and accustomed places) within about a mile along the project length. The DAHP WISAARD predictive model indicates that an archaeological survey is highly advised with a very high risk for encountering cultural resources. We note that archaeological field surveys and monitoring have been performed along Southwest Marginal Place (geoprobes), Pigeon Point and West Marginal Way SW (geotechnical borings) with one shovel test probe, and 15 monitored boreholes starting in 2018 along proposed alternative sections of the project. The Tribe also requests that a survey be performed near the proposed elevated section in Youngstown near Nucor Steel. This is near Longfellow Creek and its former outfall and one of our place names. Bore logs from the Washington State Geologic Information Portal indicate black organic silt approximately 10 feet below ground surface in and around this location. The Tribe is concerned that if one of the alternatives near this area is chosen, that there is potential for archaeological resources that have not been surveyed.

We request that if any archaeological work or monitoring is performed, we would like notification. The Tribe would also like the opportunity to be present if or when an archaeologist is on site.

In addition, the Tribe echoes its previous comments that the route with the least environmental impact be given the most consideration. This includes the heron rookery around Pigeon Point in the West Duwamish Greenbelt. We also echo that only native vegetation be used for any proposed landscaping to enhance habitat for fish and wildlife, and native avian life and native pollinators. The Tribe supports observing critical area tracts and stream buffers to preserve any remaining wetlands and stream buffers. Loss of wetland habitat is known to affect the viability of fish, water quality and increase the effects of seasonal urban flooding. We also request that stream improvements for Longfellow Creek in the APE be given consideration. This is an important creek for the Duwamish Tribe and was once a vibrant stream for smelt fish and played a part in our traditional diet.

We also strongly recommend that mature native trees in the APE are preserved. Mature trees can be of profound cultural significance to the Duwamish Tribe and provide innumerable benefits for people, climate, and wildlife. If a tree is suspected to be culturally modified, the Duwamish Tribe would like to be notified and would like the opportunity to come to the site to ensure its protection.

Figures on pages 3 and 4.



# dxwdaw?abš

Thank you,

Nancy A Sackman Cultural Preservation Duwamish Tribe

preservationdept@duwamishtribe.org

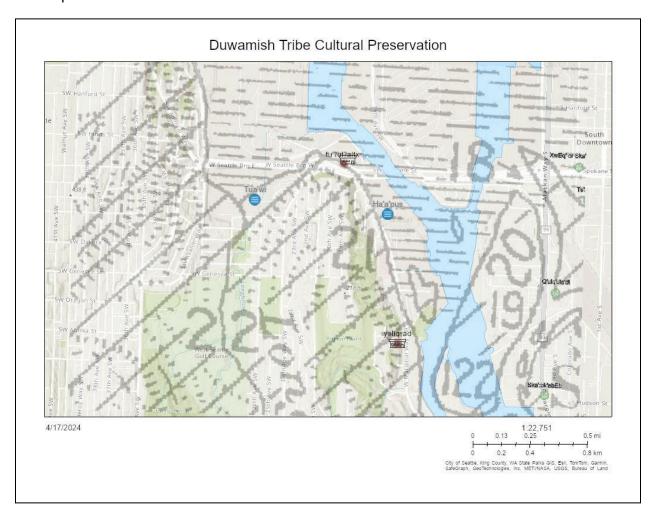
Mobile - 206.856.2564





# dxwdaw?abš

Figure 1. Cultural Map of the Lower Duwamish River with TT Waterman's overlay. Confidential - not for publication.





# dxwdaw?abš

Figure 2. Image overlay of Duwamish place names with Sound Transit's proposed alternatives in West Seattle. Red circle of proposed archaeological survey. Locations are approximate.





April 18, 2024 LPB 76/24

Susan K. Fletcher Regional Administrator US Dept of Transportation - FHA 915 Second Avenue Federal Bldg., Suite 3192 Seattle, WA 98174-1002

RE: Sound Transit
West Seattle Link Extension Project
National Historic Preservation Act, Section 106
Eligibility and Effects Determination
SHPO Project Tracking Code: 2019-02-01457

Dear Susan K. Fletcher,

Thank you for requesting our consultation on the Section 106 Determinations of Eligibility and Effects for the abovementioned project. We have reviewed the appendices provided. We generally concur with the APE and many of your eligibility and effect determinations, but there are a few things we still need to understand in order to consult on the project.

It is our understanding that there is a subset of ninety-nine (99) additional properties identified due to an expansion of the APE that have not had concurrence regarding eligibility. For those properties we are unable to comment as to whether there is an adverse effect or not. One cannot determine an effect without first determining eligibility.

Regarding Fire Station No. 14, we do not have enough information to say that we agree that there is no adverse effect to this property. We understand that there are no physical effects to the building, short of a partial taking of the site. However, to consider all the potential impacts, we needed noise and vibration studies for both construction and operation of the undertaking, information about the time of day of construction, and whether the property is anticipated to be utilized for access or staging. It is important to understand that a fire station is a residence and impacts should be evaluated accordingly. Any of the individual effects may not be adverse on their own, but we want to understand the cumulative effects to know the real impact on the historic resource. If the cumulative effects mean that it could not be used as a fire station anymore, then that would be an adverse effect to the historic fire station.

We concur that there is an adverse effect to the Cettolin House, however we are still waiting for the context study visuals and therefore we cannot consult on the level of effect or the mitigation that would be required.

Sincerely,

Sarah Sodt

City Historic Preservation Officer

Cc: Michael de Lange, DON
Amy Chasanov, SDOT
Dennis Wardlaw, DAHP
Maureen Elenga, DAHP
Mark Assam, FTA
Dezerae Hayes, Sound Transit
Alex Stevenson, Sound Transit
Lauren Swift, Sound Transit
Jennifer Schreck, Sound Transit
Cassandra Durkin, Sound Transit
Lisa Howard, Alliance for Pioneer Square
Chris Moore, Washington Trust for Historic Preservation



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 28, 2024

3633 LLC 9625 SE 71<sup>st</sup> St Mercer Island WA 98040

RE: Invitation to Participate as a Consulting Party under Section 106 of the National Historic Preservation Act for the Sound Transit West Seattle Link Extension Project

Dear 3633 LLC:

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the SODO neighborhood to West Seattle, known as the West Seattle Link Extension (WSLE) Project and is expected to receive federal funding through the Federal Transit Administration (FTA). FTA, as Lead Federal agency, has determined the WSLE project to be a Federal undertaking and therefore subject to environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). Under Section 106 and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, FTA must consider the effects of the Project on historic properties and resolve those effects through consultation with a variety of interested and affected parties.

FTA has determined the structures located at 3633 E Marginal Way S is a historic property and will be adversely affected by the WSLE Project. Accordingly, this letter serves as an invitation to you, as the property owner, to participate as a Consulting Party in the Section 106 process for the WSLE Project. As a Section 106 Consulting Party, you would be entitled to receive and review pertinent information about the WSLE Project and to participate in conversations around resolving adverse effects from Project activities. While we hope that you will formally accept this invitation, your participation as a Section 106 Consulting Party is voluntary.

Within this correspondence, you will find information about the following:

- WSLE Project
- Section 106 Process
- Opportunities for Section 106 Consulting Party to Receive Information and Provide Input
- Instructions for Accepting This Invitation

## WSLE Project

The West Seattle Link Extension Project, formerly the West Seattle and Ballard Link Extensions Project, is an element of the Sound Transit 3 Plan, the regional transit system expansion approved by voters in November 2016. Initially the West Seattle Link Extension and Ballard Link Extension were evaluated as one project, the West Seattle and Ballard Link Extensions, based on the same environmental review timeline. Following publication of the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (EIS) in January 2022, the Sound Transit Board determined additional environmental review was needed to evaluate the Ballard Link Extension. Subsequently, in July 2023 Sound Transit, in coordination with FTA, redefined the West Seattle and Ballard Link Extensions Project to separate out the Ballard Link Extension and proceed with the existing environmental review process for the West Seattle Link Extension. Sound Transit and FTA anticipate a Final EIS for the West Seattle Link Extension Project in 2024.

The WSLE Project, as currently defined, will extend light rail service approximately 4.1 miles from SODO to the Alaska Junction in West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction. The Project will construct elevated, at-grade, retained-cut, and mined guideway for light rail and include new crossings at the Duwamish Waterway (Duwamish River) and Longfellow Creek. More information about the WSLE Project may be found online at the Sound Transit website: <a href="https://www.soundtransit.org/system-expansion/west-seattle-link-extension">https://www.soundtransit.org/system-expansion/west-seattle-link-extension</a>.

#### Section 106 Process

The Section 106 process for the WSLE Project was initiated in August 2023 and has included delineation of the Area of Potential Effect (APE) (Attachment 1), information gathering to identify historic properties in the APE, and analysis to determine potential effects to historic properties. Ongoing consultation includes participation by the Department of Archaeology and Historic Preservation (DAHP), federally recognized tribes, and other parties with demonstrated interest in the project. An overview of the Section 106 process, as it pertains to the WSLE Project, is included with this invitation (Attachment 2). General information about Section 106 may be found in resources provided by the Advisory Council on Historic Preservation (ACHP), including:

- An Introduction to Section 106: <a href="www.achp.gov/protecting-historic-properties/section-106-process/introduction-section-106">www.achp.gov/protecting-historic-properties/section-106</a>-106-process/introduction-section-106
- A Citizen's Guide to Section 106 Review: <a href="www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf">www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf</a>

### Opportunities for Section 106 Consulting Parties to Receive Information and Provide Input

Formal acceptance of Consulting Party status results in broad opportunities to receive pertinent information and to offer input on the Section 106 process, beyond those provided to the general public. As a Consulting Party, FTA and Sound Transit would invite you to comment on findings and determinations regarding historic properties for the WSLE Project, measures to resolve adverse effects to historic properties, and preparation of a Programmatic Agreement. Opportunities to provide input would be through voluntary participation in virtual monthly consulting party meetings, virtual one-on-one meeting as requested by you, and review of

Section 106 documents distributed electronically by FTA and Sound Transit; in cases of document review, written comments are typically required within thirty (30) calendar days of receiving the materials. As an invited Consulting Party, the extent of your involvement in all opportunities for input would be at your discretion and according to your availability and level of interest.

#### Instructions for Accepting This Invitation

If you would like to accept this invitation to participate as a Consulting Party for the WSLE Project, please respond within thirty (30) calendar days of receipt of this letter to Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a> and provide the name(s) and email address(es) of the person(s) you wish to be your primary point(s) of contact. Following acceptance of this invitation, Alex E. Stevenson, Cultural Resources Manager, Sound Transit (<a href="mailto:alex.stevenson@soundtransit.org">alex.stevenson@soundtransit.org</a>) will reach out to the contact(s) provided to set up a virtual orientation meeting. You are welcome and encouraged to bring your questions about the WSLE Project, Consulting Party opportunities, the Section 106 process, and your property to this meeting.

You will not be considered a Section 106 Consulting Party for the West Seattle Link Extension Project until you formally accept this invitation to consult via email.

If you have any questions about this invitation, the WSLE Project, or the role of consulting parties in the Section 106 process, please contact Erin Littauer, FTA at erin.littauer@dot.gov.

## Sincerely,

SUSAN KAY Digitally signed by SUSAN KAY FLETCHER Date: 2024.05.28 13:26:34-07'00'

Susan K. Fletcher Regional Administrator Federal Transit Administration

cc: Mark Assam, FTA
Erin Littauer, FTA
Alex E. Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Lauren Swift, Sound Transit
Cassandra Durkin, Sound Transit

Enclosures: Attachment 1: Cultural Resources Area of Potential Effect

Attachment 2: WSLE Project NHPA Section 106 Compliance Summary



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 28, 2024

Buffalo Industries, Inc. 7979 S 180<sup>th</sup> St Kent WA 98032

RE: Invitation to Participate as a Consulting Party under Section 106 of the National Historic Preservation Act for the Sound Transit West Seattle Link Extension Project

Dear Buffalo Industries, Inc.:

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the SODO neighborhood to West Seattle, known as the West Seattle Link Extension (WSLE) Project and is expected to receive federal funding through the Federal Transit Administration (FTA). FTA, as Lead Federal agency, has determined the WSLE project to be a Federal undertaking and therefore subject to environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). Under Section 106 and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, FTA must consider the effects of the Project on historic properties and resolve those effects through consultation with a variety of interested and affected parties.

FTA has determined the structures located at 99 S Spokane St, The Simmons Company Metal Beds, Springs & Mattress Warehouse is a historic property and will be adversely affected by the WSLE Project. Accordingly, this letter serves as an invitation to you, as the property owner, to participate as a Consulting Party in the Section 106 process for the WSLE Project. As a Section 106 Consulting Party, you would be entitled to receive and review pertinent information about the WSLE Project and to participate in conversations around resolving adverse effects from Project activities. While we hope that you will formally accept this invitation, your participation as a Section 106 Consulting Party is voluntary.

Within this correspondence, you will find information about the following:

- WSLE Project
- Section 106 Process
- Opportunities for Section 106 Consulting Party to Receive Information and Provide Input
- Instructions for Accepting This Invitation

## **WSLE Project**

The West Seattle Link Extension Project, formerly the West Seattle and Ballard Link Extensions Project, is an element of the Sound Transit 3 Plan, the regional transit system expansion approved by voters in November 2016. Initially the West Seattle Link Extension and Ballard Link Extension were evaluated as one project, the West Seattle and Ballard Link Extensions, based on the same environmental review timeline. Following publication of the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (EIS) in January 2022, the Sound Transit Board determined additional environmental review was needed to evaluate the Ballard Link Extension. Subsequently, in July 2023 Sound Transit, in coordination with FTA, redefined the West Seattle and Ballard Link Extensions Project to separate out the Ballard Link Extension and proceed with the existing environmental review process for the West Seattle Link Extension. Sound Transit and FTA anticipate a Final EIS for the West Seattle Link Extension Project in 2024.

The WSLE Project, as currently defined, will extend light rail service approximately 4.1 miles from SODO to the Alaska Junction in West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction. The Project will construct elevated, at-grade, retained-cut, and mined guideway for light rail and include new crossings at the Duwamish Waterway (Duwamish River) and Longfellow Creek. More information about the WSLE Project may be found online at the Sound Transit website: <a href="https://www.soundtransit.org/system-expansion/west-seattle-link-extension">https://www.soundtransit.org/system-expansion/west-seattle-link-extension</a>.

#### Section 106 Process

The Section 106 process for the WSLE Project was initiated in August 2023 and has included delineation of the Area of Potential Effect (APE) (Attachment 1), information gathering to identify historic properties in the APE, and analysis to determine potential effects to historic properties. Ongoing consultation includes participation by the Department of Archaeology and Historic Preservation (DAHP), federally recognized tribes, and other parties with demonstrated interest in the project. An overview of the Section 106 process, as it pertains to the WSLE Project, is included with this invitation (Attachment 2). General information about Section 106 may be found in resources provided by the Advisory Council on Historic Preservation (ACHP), including:

- An Introduction to Section 106: <a href="www.achp.gov/protecting-historic-properties/section-106-process/introduction-section-106">www.achp.gov/protecting-historic-properties/section-106</a>-106-process/introduction-section-106
- A Citizen's Guide to Section 106 Review: <a href="www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf">www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf</a>

#### Opportunities for Section 106 Consulting Parties to Receive Information and Provide Input

Formal acceptance of Consulting Party status results in broad opportunities to receive pertinent information and to offer input on the Section 106 process, beyond those provided to the general public. As a Consulting Party, FTA and Sound Transit would invite you to comment on findings and determinations regarding historic properties for the WSLE Project, measures to resolve adverse effects to historic properties, and preparation of a Programmatic Agreement.

Opportunities to provide input would be through voluntary participation in virtual monthly

consulting party meetings, virtual one-on-one meeting as requested by you, and review of Section 106 documents distributed electronically by FTA and Sound Transit; in cases of document review, written comments are typically required within thirty (30) calendar days of receiving the materials. As an invited Consulting Party, the extent of your involvement in all opportunities for input would be at your discretion and according to your availability and level of interest.

### Instructions for Accepting This Invitation

If you would like to accept this invitation to participate as a Consulting Party for the WSLE Project, please respond within thirty (30) calendar days of receipt of this letter to Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a> and provide the name(s) and email address(es) of the person(s) you wish to be your primary point(s) of contact. Following acceptance of this invitation, Alex E. Stevenson, Cultural Resources Manager, Sound Transit (<a href="mailto:alex.stevenson@soundtransit.org">alex.stevenson@soundtransit.org</a>) will reach out to the contact(s) provided to set up a virtual orientation meeting. You are welcome and encouraged to bring your questions about the WSLE Project, Consulting Party opportunities, the Section 106 process, and your property to this meeting.

You will not be considered a Section 106 Consulting Party for the West Seattle Link Extension Project until you formally accept this invitation to consult via email.

If you have any questions about this invitation, the WSLE Project, or the role of consulting parties in the Section 106 process, please contact Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>.

#### Sincerely,

SUSAN KAY Digitally signed by SUSAN KAY FLETCHER Date: 2024.05.28 13:27:03 -07'00'

Susan K. Fletcher Regional Administrator Federal Transit Administration

cc: Mark Assam, FTA
Erin Littauer, FTA
Alex E. Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Lauren Swift, Sound Transit
Cassandra Durkin, Sound Transit

Enclosures: Attachment 1: Cultural Resources Area of Potential Effect

Attachment 2: WSLE Project NHPA Section 106 Compliance Summary



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 28, 2024

Charles and Gail Irish PO Box 6025 Williamsburg VA 23188

RE: Invitation to Participate as a Consulting Party under Section 106 of the National Historic Preservation Act for the Sound Transit West Seattle Link Extension Project

Dear Charles and Gail Irish.:

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the SODO neighborhood to West Seattle, known as the West Seattle Link Extension (WSLE) Project and is expected to receive federal funding through the Federal Transit Administration (FTA). FTA, as Lead Federal agency, has determined the WSLE project to be a Federal undertaking and therefore subject to environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). Under Section 106 and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, FTA must consider the effects of the Project on historic properties and resolve those effects through consultation with a variety of interested and affected parties.

FTA has determined the structures located at 45 S Spokane St, Nelson Iron Works Blacksmith & Machinist Shop is a historic property and will be adversely affected by the WSLE Project. Accordingly, this letter serves as an invitation to you, as the property owner, to participate as a Consulting Party in the Section 106 process for the WSLE Project. As a Section 106 Consulting Party, you would be entitled to receive and review pertinent information about the WSLE Project and to participate in conversations around resolving adverse effects from Project activities. While we hope that you will formally accept this invitation, your participation as a Section 106 Consulting Party is voluntary.

Within this correspondence, you will find information about the following:

- WSLE Project
- Section 106 Process
- Opportunities for Section 106 Consulting Party to Receive Information and Provide Input
- Instructions for Accepting This Invitation

## **WSLE Project**

The West Seattle Link Extension Project, formerly the West Seattle and Ballard Link Extensions Project, is an element of the Sound Transit 3 Plan, the regional transit system expansion approved by voters in November 2016. Initially the West Seattle Link Extension and Ballard Link Extension were evaluated as one project, the West Seattle and Ballard Link Extensions, based on the same environmental review timeline. Following publication of the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (EIS) in January 2022, the Sound Transit Board determined additional environmental review was needed to evaluate the Ballard Link Extension. Subsequently, in July 2023 Sound Transit, in coordination with FTA, redefined the West Seattle and Ballard Link Extensions Project to separate out the Ballard Link Extension and proceed with the existing environmental review process for the West Seattle Link Extension. Sound Transit and FTA anticipate a Final EIS for the West Seattle Link Extension Project in 2024.

The WSLE Project, as currently defined, will extend light rail service approximately 4.1 miles from SODO to the Alaska Junction in West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction. The Project will construct elevated, at-grade, retained-cut, and mined guideway for light rail and include new crossings at the Duwamish Waterway (Duwamish River) and Longfellow Creek. More information about the WSLE Project may be found online at the Sound Transit website: <a href="https://www.soundtransit.org/system-expansion/west-seattle-link-extension">https://www.soundtransit.org/system-expansion/west-seattle-link-extension</a>.

#### Section 106 Process

The Section 106 process for the WSLE Project was initiated in August 2023 and has included delineation of the Area of Potential Effect (APE) (Attachment 1), information gathering to identify historic properties in the APE, and analysis to determine potential effects to historic properties. Ongoing consultation includes participation by the Department of Archaeology and Historic Preservation (DAHP), federally recognized tribes, and other parties with demonstrated interest in the project. An overview of the Section 106 process, as it pertains to the WSLE Project, is included with this invitation (Attachment 2). General information about Section 106 may be found in resources provided by the Advisory Council on Historic Preservation (ACHP), including:

- An Introduction to Section 106: <a href="www.achp.gov/protecting-historic-properties/section-106-process/introduction-section-106">www.achp.gov/protecting-historic-properties/section-106</a>-106-process/introduction-section-106
- A Citizen's Guide to Section 106 Review: <a href="www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf">www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf</a>

#### Opportunities for Section 106 Consulting Parties to Receive Information and Provide Input

Formal acceptance of Consulting Party status results in broad opportunities to receive pertinent information and to offer input on the Section 106 process, beyond those provided to the general public. As a Consulting Party, FTA and Sound Transit would invite you to comment on findings and determinations regarding historic properties for the WSLE Project, measures to resolve adverse effects to historic properties, and preparation of a Programmatic Agreement.

Opportunities to provide input would be through voluntary participation in virtual monthly

consulting party meetings, virtual one-on-one meeting as requested by you, and review of Section 106 documents distributed electronically by FTA and Sound Transit; in cases of document review, written comments are typically required within thirty (30) calendar days of receiving the materials. As an invited Consulting Party, the extent of your involvement in all opportunities for input would be at your discretion and according to your availability and level of interest.

### Instructions for Accepting This Invitation

If you would like to accept this invitation to participate as a Consulting Party for the WSLE Project, please respond within thirty (30) calendar days of receipt of this letter to Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a> and provide the name(s) and email address(es) of the person(s) you wish to be your primary point(s) of contact. Following acceptance of this invitation, Alex E. Stevenson, Cultural Resources Manager, Sound Transit (<a href="mailto:alex.stevenson@soundtransit.org">alex.stevenson@soundtransit.org</a>) will reach out to the contact(s) provided to set up a virtual orientation meeting. You are welcome and encouraged to bring your questions about the WSLE Project, Consulting Party opportunities, the Section 106 process, and your property to this meeting.

You will not be considered a Section 106 Consulting Party for the West Seattle Link Extension Project until you formally accept this invitation to consult via email.

If you have any questions about this invitation, the WSLE Project, or the role of consulting parties in the Section 106 process, please contact Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>.

#### Sincerely,

SUSAN KAY Digitally signed by SUSAN KAY FLETCHER Date: 2024.05.28 13:27:33 -07'00'

Susan K. Fletcher Regional Administrator Federal Transit Administration

cc: Mark Assam, FTA
Erin Littauer, FTA
Alex E. Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Lauren Swift, Sound Transit
Cassandra Durkin, Sound Transit

Enclosures: Attachment 1: Cultural Resources Area of Potential Effect

Attachment 2: WSLE Project NHPA Section 106 Compliance Summary



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 28, 2024

Betty J Lindmark 4509 52<sup>nd</sup> Ave SW Seattle WA 981116

RE: Invitation to Participate as a Consulting Party under Section 106 of the National Historic Preservation Act for the Sound Transit West Seattle Link Extension Project

Dear Betty J Lindmark.:

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the SODO neighborhood to West Seattle, known as the West Seattle Link Extension (WSLE) Project and is expected to receive federal funding through the Federal Transit Administration (FTA). FTA, as Lead Federal agency, has determined the WSLE project to be a Federal undertaking and therefore subject to environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). Under Section 106 and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, FTA must consider the effects of the Project on historic properties and resolve those effects through consultation with a variety of interested and affected parties.

FTA has determined the structures located at 3626 E Marginal Way S, Acme Tool Works and Lindmark Machine Works are historic properties and will be adversely affected by the WSLE Project. Accordingly, this letter serves as an invitation to you, as the property owner, to participate as a Consulting Party in the Section 106 process for the WSLE Project. As a Section 106 Consulting Party, you would be entitled to receive and review pertinent information about the WSLE Project and to participate in conversations around resolving adverse effects from Project activities. While we hope that you will formally accept this invitation, your participation as a Section 106 Consulting Party is voluntary.

Within this correspondence, you will find information about the following:

- WSLE Project
- Section 106 Process
- Opportunities for Section 106 Consulting Party to Receive Information and Provide Input
- Instructions for Accepting This Invitation

## **WSLE Project**

The West Seattle Link Extension Project, formerly the West Seattle and Ballard Link Extensions Project, is an element of the Sound Transit 3 Plan, the regional transit system expansion approved by voters in November 2016. Initially the West Seattle Link Extension and Ballard Link Extension were evaluated as one project, the West Seattle and Ballard Link Extensions, based on the same environmental review timeline. Following publication of the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (EIS) in January 2022, the Sound Transit Board determined additional environmental review was needed to evaluate the Ballard Link Extension. Subsequently, in July 2023 Sound Transit, in coordination with FTA, redefined the West Seattle and Ballard Link Extensions Project to separate out the Ballard Link Extension and proceed with the existing environmental review process for the West Seattle Link Extension. Sound Transit and FTA anticipate a Final EIS for the West Seattle Link Extension Project in 2024.

The WSLE Project, as currently defined, will extend light rail service approximately 4.1 miles from SODO to the Alaska Junction in West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction. The Project will construct elevated, at-grade, retained-cut, and mined guideway for light rail and include new crossings at the Duwamish Waterway (Duwamish River) and Longfellow Creek. More information about the WSLE Project may be found online at the Sound Transit website: <a href="https://www.soundtransit.org/system-expansion/west-seattle-link-extension">https://www.soundtransit.org/system-expansion/west-seattle-link-extension</a>.

#### Section 106 Process

The Section 106 process for the WSLE Project was initiated in August 2023 and has included delineation of the Area of Potential Effect (APE) (Attachment 1), information gathering to identify historic properties in the APE, and analysis to determine potential effects to historic properties. Ongoing consultation includes participation by the Department of Archaeology and Historic Preservation (DAHP), federally recognized tribes, and other parties with demonstrated interest in the project. An overview of the Section 106 process, as it pertains to the WSLE Project, is included with this invitation (Attachment 2). General information about Section 106 may be found in resources provided by the Advisory Council on Historic Preservation (ACHP), including:

- An Introduction to Section 106: <a href="www.achp.gov/protecting-historic-properties/section-106-process/introduction-section-106">www.achp.gov/protecting-historic-properties/section-106</a>-106-process/introduction-section-106
- A Citizen's Guide to Section 106 Review: <a href="www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf">www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf</a>

#### Opportunities for Section 106 Consulting Parties to Receive Information and Provide Input

Formal acceptance of Consulting Party status results in broad opportunities to receive pertinent information and to offer input on the Section 106 process, beyond those provided to the general public. As a Consulting Party, FTA and Sound Transit would invite you to comment on findings and determinations regarding historic properties for the WSLE Project, measures to resolve adverse effects to historic properties, and preparation of a Programmatic Agreement.

Opportunities to provide input would be through voluntary participation in virtual monthly

consulting party meetings, virtual one-on-one meeting as requested by you, and review of Section 106 documents distributed electronically by FTA and Sound Transit; in cases of document review, written comments are typically required within thirty (30) calendar days of receiving the materials. As an invited Consulting Party, the extent of your involvement in all opportunities for input would be at your discretion and according to your availability and level of interest.

### Instructions for Accepting This Invitation

If you would like to accept this invitation to participate as a Consulting Party for the WSLE Project, please respond within thirty (30) calendar days of receipt of this letter to Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a> and provide the name(s) and email address(es) of the person(s) you wish to be your primary point(s) of contact. Following acceptance of this invitation, Alex E. Stevenson, Cultural Resources Manager, Sound Transit (<a href="mailto:alex.stevenson@soundtransit.org">alex.stevenson@soundtransit.org</a>) will reach out to the contact(s) provided to set up a virtual orientation meeting. You are welcome and encouraged to bring your questions about the WSLE Project, Consulting Party opportunities, the Section 106 process, and your property to this meeting.

You will not be considered a Section 106 Consulting Party for the West Seattle Link Extension Project until you formally accept this invitation to consult via email.

If you have any questions about this invitation, the WSLE Project, or the role of consulting parties in the Section 106 process, please contact Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>.

#### Sincerely,

SUSAN KAY Digitally signed by SUSAN KAY FLETCHER Date: 2024.05.28 13:28:04 -07'00'

Susan K. Fletcher Regional Administrator Federal Transit Administration

cc: Mark Assam, FTA
Erin Littauer, FTA
Alex E. Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Lauren Swift, Sound Transit
Cassandra Durkin, Sound Transit

Enclosures: Attachment 1: Cultural Resources Area of Potential Effect

Attachment 2: WSLE Project NHPA Section 106 Compliance Summary



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 28, 2024

Marilyn Kennel and Al McMurray 4022 32<sup>nd</sup> Ave SW Seattle WA 98126

RE: Invitation to Participate as a Consulting Party under Section 106 of the National Historic Preservation Act for the Sound Transit West Seattle Link Extension Project

Dear Marilyn Kennel and Al McMurray:

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the SODO neighborhood to West Seattle, known as the West Seattle Link Extension (WSLE) Project and is expected to receive federal funding through the Federal Transit Administration (FTA). FTA, as Lead Federal agency, has determined the WSLE project to be a Federal undertaking and therefore subject to environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). Under Section 106 and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, FTA must consider the effects of the Project on historic properties and resolve those effects through consultation with a variety of interested and affected parties.

FTA has determined the structures located at 4022 32<sup>nd</sup> Ave SW, Cettolin House is a historic property and will be adversely affected by the WSLE Project. Accordingly, this letter serves as an invitation to you, as the property owner, to participate as a Consulting Party in the Section 106 process for the WSLE Project. As a Section 106 Consulting Party, you would be entitled to receive and review pertinent information about the WSLE Project and to participate in conversations around resolving adverse effects from Project activities. While we hope that you will formally accept this invitation, your participation as a Section 106 Consulting Party is voluntary.

Within this correspondence, you will find information about the following:

- WSLE Project
- Section 106 Process
- Opportunities for Section 106 Consulting Party to Receive Information and Provide Input
- Instructions for Accepting This Invitation

## **WSLE Project**

The West Seattle Link Extension Project, formerly the West Seattle and Ballard Link Extensions Project, is an element of the Sound Transit 3 Plan, the regional transit system expansion approved by voters in November 2016. Initially the West Seattle Link Extension and Ballard Link Extension were evaluated as one project, the West Seattle and Ballard Link Extensions, based on the same environmental review timeline. Following publication of the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (EIS) in January 2022, the Sound Transit Board determined additional environmental review was needed to evaluate the Ballard Link Extension. Subsequently, in July 2023 Sound Transit, in coordination with FTA, redefined the West Seattle and Ballard Link Extensions Project to separate out the Ballard Link Extension and proceed with the existing environmental review process for the West Seattle Link Extension. Sound Transit and FTA anticipate a Final EIS for the West Seattle Link Extension Project in 2024.

The WSLE Project, as currently defined, will extend light rail service approximately 4.1 miles from SODO to the Alaska Junction in West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction. The Project will construct elevated, at-grade, retained-cut, and mined guideway for light rail and include new crossings at the Duwamish Waterway (Duwamish River) and Longfellow Creek. More information about the WSLE Project may be found online at the Sound Transit website: <a href="https://www.soundtransit.org/system-expansion/west-seattle-link-extension">https://www.soundtransit.org/system-expansion/west-seattle-link-extension</a>.

#### Section 106 Process

The Section 106 process for the WSLE Project was initiated in August 2023 and has included delineation of the Area of Potential Effect (APE) (Attachment 1), information gathering to identify historic properties in the APE, and analysis to determine potential effects to historic properties. Ongoing consultation includes participation by the Department of Archaeology and Historic Preservation (DAHP), federally recognized tribes, and other parties with demonstrated interest in the project. An overview of the Section 106 process, as it pertains to the WSLE Project, is included with this invitation (Attachment 2). General information about Section 106 may be found in resources provided by the Advisory Council on Historic Preservation (ACHP), including:

- An Introduction to Section 106: <a href="www.achp.gov/protecting-historic-properties/section-106-process/introduction-section-106">www.achp.gov/protecting-historic-properties/section-106</a>-106-process/introduction-section-106
- A Citizen's Guide to Section 106 Review: <a href="www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf">www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf</a>

#### Opportunities for Section 106 Consulting Parties to Receive Information and Provide Input

Formal acceptance of Consulting Party status results in broad opportunities to receive pertinent information and to offer input on the Section 106 process, beyond those provided to the general public. As a Consulting Party, FTA and Sound Transit would invite you to comment on findings and determinations regarding historic properties for the WSLE Project, measures to resolve adverse effects to historic properties, and preparation of a Programmatic Agreement.

Opportunities to provide input would be through voluntary participation in virtual monthly

consulting party meetings, virtual one-on-one meeting as requested by you, and review of Section 106 documents distributed electronically by FTA and Sound Transit; in cases of document review, written comments are typically required within thirty (30) calendar days of receiving the materials. As an invited Consulting Party, the extent of your involvement in all opportunities for input would be at your discretion and according to your availability and level of interest.

### Instructions for Accepting This Invitation

If you would like to accept this invitation to participate as a Consulting Party for the WSLE Project, please respond within thirty (30) calendar days of receipt of this letter to Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a> and provide the name(s) and email address(es) of the person(s) you wish to be your primary point(s) of contact. Following acceptance of this invitation, Alex E. Stevenson, Cultural Resources Manager, Sound Transit (<a href="mailto:alex.stevenson@soundtransit.org">alex.stevenson@soundtransit.org</a>) will reach out to the contact(s) provided to set up a virtual orientation meeting. You are welcome and encouraged to bring your questions about the WSLE Project, Consulting Party opportunities, the Section 106 process, and your property to this meeting.

You will not be considered a Section 106 Consulting Party for the West Seattle Link Extension Project until you formally accept this invitation to consult via email.

If you have any questions about this invitation, the WSLE Project, or the role of consulting parties in the Section 106 process, please contact Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>.

#### Sincerely,

SUSAN KAY Digitally signed by SUSAN KAY FLETCHER Date: 2024.05.28 13:22:42 -07'00'

Susan K. Fletcher Regional Administrator Federal Transit Administration

cc: Mark Assam, FTA
Erin Littauer, FTA
Alex E. Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Lauren Swift, Sound Transit
Cassandra Durkin, Sound Transit

Enclosures: Attachment 1: Cultural Resources Area of Potential Effect

Attachment 2: WSLE Project NHPA Section 106 Compliance Summary



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 28, 2024

Nesor Investment Co. C/O Alaska Copper + Brass PO Box 3558 Federal Way WA 98063

RE: Invitation to Participate as a Consulting Party under Section 106 of the National Historic Preservation Act for the Sound Transit West Seattle Link Extension Project

Dear Nesor Investment Co.:

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the SODO neighborhood to West Seattle, known as the West Seattle Link Extension (WSLE) Project and is expected to receive federal funding through the Federal Transit Administration (FTA). FTA, as Lead Federal agency, has determined the WSLE project to be a Federal undertaking and therefore subject to environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). Under Section 106 and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, FTA must consider the effects of the Project on historic properties and resolve those effects through consultation with a variety of interested and affected parties.

FTA has determined the structures located at 2958 6<sup>th</sup> Ave S, Alaskan Copper Co. Employment Office and Auto Repair Garage are historic properties and will be adversely affected by the WSLE Project. Accordingly, this letter serves as an invitation to you, as the property owner, to participate as a Consulting Party in the Section 106 process for the WSLE Project. As a Section 106 Consulting Party, you would be entitled to receive and review pertinent information about the WSLE Project and to participate in conversations around resolving adverse effects from Project activities. While we hope that you will formally accept this invitation, your participation as a Section 106 Consulting Party is voluntary.

Within this correspondence, you will find information about the following:

- WSLE Project
- Section 106 Process
- Opportunities for Section 106 Consulting Party to Receive Information and Provide Input
- Instructions for Accepting This Invitation

## **WSLE Project**

The West Seattle Link Extension Project, formerly the West Seattle and Ballard Link Extensions Project, is an element of the Sound Transit 3 Plan, the regional transit system expansion approved by voters in November 2016. Initially the West Seattle Link Extension and Ballard Link Extension were evaluated as one project, the West Seattle and Ballard Link Extensions, based on the same environmental review timeline. Following publication of the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (EIS) in January 2022, the Sound Transit Board determined additional environmental review was needed to evaluate the Ballard Link Extension. Subsequently, in July 2023 Sound Transit, in coordination with FTA, redefined the West Seattle and Ballard Link Extensions Project to separate out the Ballard Link Extension and proceed with the existing environmental review process for the West Seattle Link Extension. Sound Transit and FTA anticipate a Final EIS for the West Seattle Link Extension Project in 2024.

The WSLE Project, as currently defined, will extend light rail service approximately 4.1 miles from SODO to the Alaska Junction in West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction. The Project will construct elevated, at-grade, retained-cut, and mined guideway for light rail and include new crossings at the Duwamish Waterway (Duwamish River) and Longfellow Creek. More information about the WSLE Project may be found online at the Sound Transit website: <a href="https://www.soundtransit.org/system-expansion/west-seattle-link-extension">https://www.soundtransit.org/system-expansion/west-seattle-link-extension</a>.

#### Section 106 Process

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- A Citizen's Guide to Section 106 Review: <a href="www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf">www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf</a>

#### Opportunities for Section 106 Consulting Parties to Receive Information and Provide Input

Formal acceptance of Consulting Party status results in broad opportunities to receive pertinent information and to offer input on the Section 106 process, beyond those provided to the general public. As a Consulting Party, FTA and Sound Transit would invite you to comment on findings and determinations regarding historic properties for the WSLE Project, measures to resolve adverse effects to historic properties, and preparation of a Programmatic Agreement.

Opportunities to provide input would be through voluntary participation in virtual monthly

consulting party meetings, virtual one-on-one meeting as requested by you, and review of Section 106 documents distributed electronically by FTA and Sound Transit; in cases of document review, written comments are typically required within thirty (30) calendar days of receiving the materials. As an invited Consulting Party, the extent of your involvement in all opportunities for input would be at your discretion and according to your availability and level of interest.

### Instructions for Accepting This Invitation

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You will not be considered a Section 106 Consulting Party for the West Seattle Link Extension Project until you formally accept this invitation to consult via email.

If you have any questions about this invitation, the WSLE Project, or the role of consulting parties in the Section 106 process, please contact Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>.

#### Sincerely,

SUSAN KAY Digitally signed by SUSAN KAY FLETCHER Date: 2024.05.28 13:24:05-07'00'

Susan K. Fletcher Regional Administrator Federal Transit Administration

cc: Mark Assam, FTA
Erin Littauer, FTA
Alex E. Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Lauren Swift, Sound Transit
Cassandra Durkin, Sound Transit

Enclosures: Attachment 1: Cultural Resources Area of Potential Effect

Attachment 2: WSLE Project NHPA Section 106 Compliance Summary



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 28, 2024

Quad-Mac LLC 10894 NE Country Club RD Bainbridge Island WA 98110

RE: Invitation to Participate as a Consulting Party under Section 106 of the National Historic Preservation Act for the Sound Transit West Seattle Link Extension Project

Dear Quad-Mac LLC:

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the SODO neighborhood to West Seattle, known as the West Seattle Link Extension (WSLE) Project and is expected to receive federal funding through the Federal Transit Administration (FTA). FTA, as Lead Federal agency, has determined the WSLE project to be a Federal undertaking and therefore subject to environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). Under Section 106 and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, FTA must consider the effects of the Project on historic properties and resolve those effects through consultation with a variety of interested and affected parties.

FTA has determined the structures located at 3623 E Marginal Way S and 3621 E Marginal Way S, Air Reduction Company, Carbide Storage Building and Auto Repair Garage are historic properties and will be adversely affected by the WSLE Project. Accordingly, this letter serves as an invitation to you, as the property owner, to participate as a Consulting Party in the Section 106 process for the WSLE Project. As a Section 106 Consulting Party, you would be entitled to receive and review pertinent information about the WSLE Project and to participate in conversations around resolving adverse effects from Project activities. While we hope that you will formally accept this invitation, your participation as a Section 106 Consulting Party is voluntary.

Within this correspondence, you will find information about the following:

- WSLE Project
- Section 106 Process
- Opportunities for Section 106 Consulting Party to Receive Information and Provide Input
- Instructions for Accepting This Invitation

### **WSLE Project**

The West Seattle Link Extension Project, formerly the West Seattle and Ballard Link Extensions Project, is an element of the Sound Transit 3 Plan, the regional transit system expansion approved by voters in November 2016. Initially the West Seattle Link Extension and Ballard Link Extension were evaluated as one project, the West Seattle and Ballard Link Extensions, based on the same environmental review timeline. Following publication of the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (EIS) in January 2022, the Sound Transit Board determined additional environmental review was needed to evaluate the Ballard Link Extension. Subsequently, in July 2023 Sound Transit, in coordination with FTA, redefined the West Seattle and Ballard Link Extensions Project to separate out the Ballard Link Extension and proceed with the existing environmental review process for the West Seattle Link Extension. Sound Transit and FTA anticipate a Final EIS for the West Seattle Link Extension Project in 2024.

The WSLE Project, as currently defined, will extend light rail service approximately 4.1 miles from SODO to the Alaska Junction in West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction. The Project will construct elevated, at-grade, retained-cut, and mined guideway for light rail and include new crossings at the Duwamish Waterway (Duwamish River) and Longfellow Creek. More information about the WSLE Project may be found online at the Sound Transit website: <a href="https://www.soundtransit.org/system-expansion/west-seattle-link-extension">https://www.soundtransit.org/system-expansion/west-seattle-link-extension</a>.

### Section 106 Process

The Section 106 process for the WSLE Project was initiated in August 2023 and has included delineation of the Area of Potential Effect (APE) (Attachment 1), information gathering to identify historic properties in the APE, and analysis to determine potential effects to historic properties. Ongoing consultation includes participation by the Department of Archaeology and Historic Preservation (DAHP), federally recognized tribes, and other parties with demonstrated interest in the project. An overview of the Section 106 process, as it pertains to the WSLE Project, is included with this invitation (Attachment 2). General information about Section 106 may be found in resources provided by the Advisory Council on Historic Preservation (ACHP), including:

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### Opportunities for Section 106 Consulting Parties to Receive Information and Provide Input

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Opportunities to provide input would be through voluntary participation in virtual monthly

consulting party meetings, virtual one-on-one meeting as requested by you, and review of Section 106 documents distributed electronically by FTA and Sound Transit; in cases of document review, written comments are typically required within thirty (30) calendar days of receiving the materials. As an invited Consulting Party, the extent of your involvement in all opportunities for input would be at your discretion and according to your availability and level of interest.

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### Sincerely,

SUSAN KAY Digitally signed by SUSAN KAY FLETCHER Date: 2024.05.28 13:24:35-07'00'

Susan K. Fletcher Regional Administrator Federal Transit Administration

cc: Mark Assam, FTA
Erin Littauer, FTA
Alex E. Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Lauren Swift, Sound Transit
Cassandra Durkin, Sound Transit

Enclosures: Attachment 1: Cultural Resources Area of Potential Effect

Attachment 2: WSLE Project NHPA Section 106 Compliance Summary



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 28, 2024

Redwall LLC 4338 Evanston Ave N Seattle WA 98033

RE: Invitation to Participate as a Consulting Party under Section 106 of the National Historic Preservation Act for the Sound Transit West Seattle Link Extension Project

Dear Redwall LLC:

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the SODO neighborhood to West Seattle, known as the West Seattle Link Extension (WSLE) Project and is expected to receive federal funding through the Federal Transit Administration (FTA). FTA, as Lead Federal agency, has determined the WSLE project to be a Federal undertaking and therefore subject to environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). Under Section 106 and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, FTA must consider the effects of the Project on historic properties and resolve those effects through consultation with a variety of interested and affected parties.

FTA has determined the structures located at 3628 E Marginal Way S, Edwards Ice Machine Co./ Eagle Metal Co. is a historic property and will be adversely affected by the WSLE Project. Accordingly, this letter serves as an invitation to you, as the property owner, to participate as a Consulting Party in the Section 106 process for the WSLE Project. As a Section 106 Consulting Party, you would be entitled to receive and review pertinent information about the WSLE Project and to participate in conversations around resolving adverse effects from Project activities. While we hope that you will formally accept this invitation, your participation as a Section 106 Consulting Party is voluntary.

Within this correspondence, you will find information about the following:

- WSLE Project
- Section 106 Process
- Opportunities for Section 106 Consulting Party to Receive Information and Provide Input
- Instructions for Accepting This Invitation

### **WSLE Project**

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The WSLE Project, as currently defined, will extend light rail service approximately 4.1 miles from SODO to the Alaska Junction in West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction. The Project will construct elevated, at-grade, retained-cut, and mined guideway for light rail and include new crossings at the Duwamish Waterway (Duwamish River) and Longfellow Creek. More information about the WSLE Project may be found online at the Sound Transit website: <a href="https://www.soundtransit.org/system-expansion/west-seattle-link-extension">https://www.soundtransit.org/system-expansion/west-seattle-link-extension</a>.

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- A Citizen's Guide to Section 106 Review: <a href="www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf">www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf</a>

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Opportunities to provide input would be through voluntary participation in virtual monthly

consulting party meetings, virtual one-on-one meeting as requested by you, and review of Section 106 documents distributed electronically by FTA and Sound Transit; in cases of document review, written comments are typically required within thirty (30) calendar days of receiving the materials. As an invited Consulting Party, the extent of your involvement in all opportunities for input would be at your discretion and according to your availability and level of interest.

### Instructions for Accepting This Invitation

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### Sincerely,

SUSAN KAY Digitally signed by SUSAN KAY FLETCHER Date: 2024.05.28 Date: 20

Susan K. Fletcher Regional Administrator Federal Transit Administration

cc: Mark Assam, FTA
Erin Littauer, FTA
Alex E. Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Lauren Swift, Sound Transit
Cassandra Durkin, Sound Transit

Enclosures: Attachment 1: Cultural Resources Area of Potential Effect

Attachment 2: WSLE Project NHPA Section 106 Compliance Summary



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 28, 2024

Riverside Mill LLC 3800 W Marginal Way SW Seattle WA 98106

RE: Invitation to Participate as a Consulting Party under Section 106 of the National Historic Preservation Act for the Sound Transit West Seattle Link Extension Project

Dear Riverside Mill LLC:

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the SODO neighborhood to West Seattle, known as the West Seattle Link Extension (WSLE) Project and is expected to receive federal funding through the Federal Transit Administration (FTA). FTA, as Lead Federal agency, has determined the WSLE project to be a Federal undertaking and therefore subject to environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). Under Section 106 and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, FTA must consider the effects of the Project on historic properties and resolve those effects through consultation with a variety of interested and affected parties.

FTA has determined the structures located at 3800 W Marginal Way SW, Pacific Forge Company/ Bethlehem Steel Nut and Bolt Factory Office, Pacific Coast Forge Building, North Warehouse, South Warehouse, and East Warehouse are historic properties and will be adversely affected by the WSLE Project. Accordingly, this letter serves as an invitation to you, as the property owner, to participate as a Consulting Party in the Section 106 process for the WSLE Project. As a Section 106 Consulting Party, you would be entitled to receive and review pertinent information about the WSLE Project and to participate in conversations around resolving adverse effects from Project activities. While we hope that you will formally accept this invitation, your participation as a Section 106 Consulting Party is voluntary.

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- Opportunities for Section 106 Consulting Party to Receive Information and Provide Input
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consulting party meetings, virtual one-on-one meeting as requested by you, and review of Section 106 documents distributed electronically by FTA and Sound Transit; in cases of document review, written comments are typically required within thirty (30) calendar days of receiving the materials. As an invited Consulting Party, the extent of your involvement in all opportunities for input would be at your discretion and according to your availability and level of interest.

### Instructions for Accepting This Invitation

If you would like to accept this invitation to participate as a Consulting Party for the WSLE Project, please respond within thirty (30) calendar days of receipt of this letter to Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a> and provide the name(s) and email address(es) of the person(s) you wish to be your primary point(s) of contact. Following acceptance of this invitation, Alex E. Stevenson, Cultural Resources Manager, Sound Transit (<a href="mailto:alex.stevenson@soundtransit.org">alex.stevenson@soundtransit.org</a>) will reach out to the contact(s) provided to set up a virtual orientation meeting. You are welcome and encouraged to bring your questions about the WSLE Project, Consulting Party opportunities, the Section 106 process, and your property to this meeting.

You will not be considered a Section 106 Consulting Party for the West Seattle Link Extension Project until you formally accept this invitation to consult via email.

If you have any questions about this invitation, the WSLE Project, or the role of consulting parties in the Section 106 process, please contact Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>.

### Sincerely,

SUSAN KAY Digitally signed by SUSAN KAY FLETCHER Date: 2024.05.28 Date: 2034.05.28 Date: 2034.05.20 Date: 2034.05.28 Date: 20

Susan K. Fletcher Regional Administrator Federal Transit Administration

cc: Mark Assam, FTA
Erin Littauer, FTA
Alex E. Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Lauren Swift, Sound Transit
Cassandra Durkin, Sound Transit

Enclosures: Attachment 1: Cultural Resources Area of Potential Effect

Attachment 2: WSLE Project NHPA Section 106 Compliance Summary



REGION X Alaska, Idaho, Oregon, Washington 915 Second Avenue Federal Bldg. Suite 3142 Seattle, WA 98174-1002 206-220-7954 206-220-7959 (fax)

May 28, 2024

TCMM LLC 2410 Boyer Ave E, #1 Seattle WA 98112

RE: Invitation to Participate as a Consulting Party under Section 106 of the National Historic Preservation Act for the Sound Transit West Seattle Link Extension Project

Dear TCMM LLC:

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the SODO neighborhood to West Seattle, known as the West Seattle Link Extension (WSLE) Project and is expected to receive federal funding through the Federal Transit Administration (FTA). FTA, as Lead Federal agency, has determined the WSLE project to be a Federal undertaking and therefore subject to environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). Under Section 106 and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, FTA must consider the effects of the Project on historic properties and resolve those effects through consultation with a variety of interested and affected parties.

FTA has determined the structures located at 3648 E Marginal Way S, AM Castle and Company is a historic property and will be adversely affected by the WSLE Project. Accordingly, this letter serves as an invitation to you, as the property owner, to participate as a Consulting Party in the Section 106 process for the WSLE Project. As a Section 106 Consulting Party, you would be entitled to receive and review pertinent information about the WSLE Project and to participate in conversations around resolving adverse effects from Project activities. While we hope that you will formally accept this invitation, your participation as a Section 106 Consulting Party is voluntary.

Within this correspondence, you will find information about the following:

- WSLE Project
- Section 106 Process
- Opportunities for Section 106 Consulting Party to Receive Information and Provide Input
- Instructions for Accepting This Invitation

### **WSLE Project**

The West Seattle Link Extension Project, formerly the West Seattle and Ballard Link Extensions Project, is an element of the Sound Transit 3 Plan, the regional transit system expansion approved by voters in November 2016. Initially the West Seattle Link Extension and Ballard Link Extension were evaluated as one project, the West Seattle and Ballard Link Extensions, based on the same environmental review timeline. Following publication of the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (EIS) in January 2022, the Sound Transit Board determined additional environmental review was needed to evaluate the Ballard Link Extension. Subsequently, in July 2023 Sound Transit, in coordination with FTA, redefined the West Seattle and Ballard Link Extensions Project to separate out the Ballard Link Extension and proceed with the existing environmental review process for the West Seattle Link Extension. Sound Transit and FTA anticipate a Final EIS for the West Seattle Link Extension Project in 2024.

The WSLE Project, as currently defined, will extend light rail service approximately 4.1 miles from SODO to the Alaska Junction in West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction. The Project will construct elevated, at-grade, retained-cut, and mined guideway for light rail and include new crossings at the Duwamish Waterway (Duwamish River) and Longfellow Creek. More information about the WSLE Project may be found online at the Sound Transit website: <a href="https://www.soundtransit.org/system-expansion/west-seattle-link-extension">https://www.soundtransit.org/system-expansion/west-seattle-link-extension</a>.

### Section 106 Process

The Section 106 process for the WSLE Project was initiated in August 2023 and has included delineation of the Area of Potential Effect (APE) (Attachment 1), information gathering to identify historic properties in the APE, and analysis to determine potential effects to historic properties. Ongoing consultation includes participation by the Department of Archaeology and Historic Preservation (DAHP), federally recognized tribes, and other parties with demonstrated interest in the project. An overview of the Section 106 process, as it pertains to the WSLE Project, is included with this invitation (Attachment 2). General information about Section 106 may be found in resources provided by the Advisory Council on Historic Preservation (ACHP), including:

- An Introduction to Section 106: <a href="www.achp.gov/protecting-historic-properties/section-106-process/introduction-section-106">www.achp.gov/protecting-historic-properties/section-106-process/introduction-section-106</a>
- A Citizen's Guide to Section 106 Review: <a href="www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf">www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf</a>

### Opportunities for Section 106 Consulting Parties to Receive Information and Provide Input

Formal acceptance of Consulting Party status results in broad opportunities to receive pertinent information and to offer input on the Section 106 process, beyond those provided to the general public. As a Consulting Party, FTA and Sound Transit would invite you to comment on findings and determinations regarding historic properties for the WSLE Project, measures to resolve adverse effects to historic properties, and preparation of a Programmatic Agreement.

Opportunities to provide input would be through voluntary participation in virtual monthly

consulting party meetings, virtual one-on-one meeting as requested by you, and review of Section 106 documents distributed electronically by FTA and Sound Transit; in cases of document review, written comments are typically required within thirty (30) calendar days of receiving the materials. As an invited Consulting Party, the extent of your involvement in all opportunities for input would be at your discretion and according to your availability and level of interest.

### Instructions for Accepting This Invitation

If you would like to accept this invitation to participate as a Consulting Party for the WSLE Project, please respond within thirty (30) calendar days of receipt of this letter to Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a> and provide the name(s) and email address(es) of the person(s) you wish to be your primary point(s) of contact. Following acceptance of this invitation, Alex E. Stevenson, Cultural Resources Manager, Sound Transit (<a href="mailto:alex.stevenson@soundtransit.org">alex.stevenson@soundtransit.org</a>) will reach out to the contact(s) provided to set up a virtual orientation meeting. You are welcome and encouraged to bring your questions about the WSLE Project, Consulting Party opportunities, the Section 106 process, and your property to this meeting.

You will not be considered a Section 106 Consulting Party for the West Seattle Link Extension Project until you formally accept this invitation to consult via email.

If you have any questions about this invitation, the WSLE Project, or the role of consulting parties in the Section 106 process, please contact Erin Littauer, FTA at <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>.

### Sincerely,

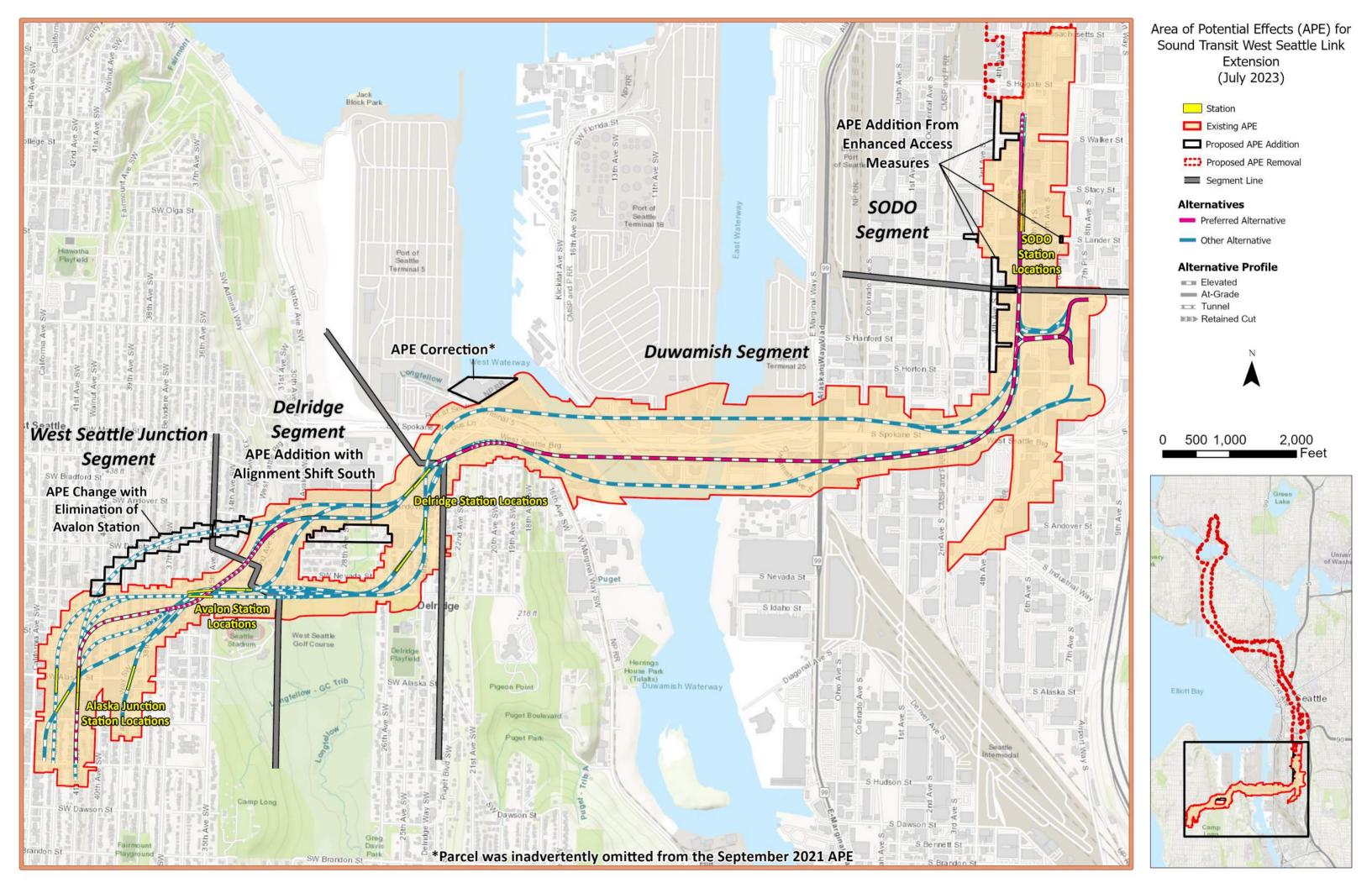
SUSAN KAY Digitally signed by SUSAN KAY FLETCHER Date: 2024.05.28

Susan K. Fletcher Regional Administrator Federal Transit Administration

cc: Mark Assam, FTA
Erin Littauer, FTA
Alex E. Stevenson, Sound Transit
Jennifer Schreck, Sound Transit
Lauren Swift, Sound Transit
Cassandra Durkin, Sound Transit

Enclosures: Attachment 1: Cultural Resources Area of Potential Effect

Attachment 2: WSLE Project NHPA Section 106 Compliance Summary



# West Seattle Link Extension Project

# National Historic Preservation Act Section 106 Compliance Summary

The West Seattle Link Extension Project, formerly the West Seattle and Ballard Link Extensions Project, is an element of the Sound Transit 3 Plan, the regional transit system expansion approved by voters in November 2016. Initially the West Seattle Link Extension and Ballard Link Extension were evaluated as one project, the West Seattle and Ballard Link Extensions, based on the same environmental review timeline. Following the January 2022 publication of the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (EIS), in July of 2022, the Sound Transit Board determined additional environmental review was needed to evaluate the Ballard Link Extension. Subsequently, in July 2023 Sound Transit, in coordination with FTA, redefined the West Seattle and Ballard Link Extensions Project to separate out the Ballard Link Extension and proceed with the existing environmental review process for the West Seattle Link Extension. Sound Transit and FTA anticipate a Final EIS for the West Seattle Link Extension Project in 2024. Sound Transit anticipates a separate environmental review process for the Ballard Link Extension to start in 2024.

The WSLE Project, as currently defined, will extend light rail service approximately 4.1 miles from SODO to the Alaska Junction in West Seattle and include new stations at SODO, Delridge, Avalon and Alaska Junction. The Project will construct elevated, atgrade, retained-cut, and mined guideway for light rail and include new crossings at the Duwamish Waterway (Duwamish River) and Longfellow Creek. More information about the WSLE Project may be found online at the Sound Transit website: https://www.soundtransit.org/systemexpansion/west-seattle-link-extension. The Section 106 of the National Historic Preservation Act (NHPA) review process for the WSLE Project is led by the Federal Transit Administration (FTA). As lead Federal agency, FTA is responsible for compliance with Section 106 (NHPA; 54 USC 306101) and its implementing regulations at 36 CFR Part 800 (Protection of Historic Properties) (NHPA Section 106). The Section 106 process requires federal agencies to consider the effects of their undertakings on historic properties and to afford Consulting Parties the

## **Key Terminology\***

**undertaking** – projects, activities, or programs funded in whole or in part under the direct or indirect jurisdiction of a federal agency.

**historic property** – any pre-contact or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic <u>Places</u>.

**Consulting Party** – a person, entity, or organization that has consultative standing in the Section 106 process in addition to FTA and the Advisory Council on Historic Preservation.

**effect** – an alteration to any of the characteristics of a historic property that qualify the property for inclusion in the National Register of Historic Places.

**adverse effect** – found when an undertaking may have an effect that would diminish the integrity of the historic property, through activities such as demolition or alteration of significant setting features.

**integrity** - the ability of a historic property to convey its significance; the National Register of Historic Places identifies seven aspects of integrity, including location, design, setting, materials, workmanship, feeling, and association.

opportunity to comment. The goal of consultation is to identify historic properties potentially affected

by the undertaking, assess effects of the undertaking on historic properties, and seek ways to avoid,

minimize, or mitigate any adverse effects on historic properties.

FTA, as lead federal agency, reinitiated consultation on the redefined West Seattle and Ballard Link Extensions Project, now the West Seattle Link Extension Project (WSLE) and revised area of potential effects (APE) under Section 106 in August 2023. Formal invitation to consult on the WSLE Project was extended to tribes as well as points of contact from governments and organizations that had previously consulted on the former West Seattle and Ballard Link Extensions Project. As of August 2023, 5 federally recognized tribes and 3 other governments organizations have accepted the invitation to consult from FTA in the Section 106 process for the WSLE Project.

## Key Terminology, contz

**Area of Potential Effect (APE)** – the geographic area(s) within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.

**Programmatic Agreement (PA)** – a legal document that establishes the roles and responsibilities of the federal agency and consulting parties, the agreed-upon measures to resolve adverse effects, and processes for the phased identification and evaluation of historic properties and protocols for involving stakeholders in consultation as effects are identified and resolved.

To date, Section 106 Consulting Parties for the WSLE Project have been involved in conversations regarding the following aspects of the Section 106 process:

- Delineation of the Area of Potential Effect: In correspondence dated August 3, 2023, FTA notified Consulting Parties and Consulting Tribes of the redefinition of the West Seattle and Ballard Link Extension Project, now the West Seattle Link Extension Project under Section 106, provided maps depicting the revised Area of Potential Effect (APE) as determined by FTA in coordination with Sound Transit. The Washington State Department of Archaeology and Historic Preservation (DAHP) agreed with the definition of the APE in correspondence dated August 14, 2023.
- Resource Identification and Effects Analysis: In correspondence dated March 22, 2024, FTA submitted Section 106 Determinations of Eligibility (DOEs) for the historic built environment resources within the APE and a determination of adverse effect for the project to DAHP. As part of this consultation, adverse effects to individual built environment resources located along the WSLE Preferred Alternative were identified. Section 106 Consulting Parties were copied on the submittal and invited to provide comments within 30 days of receipt. The Washington State Department of Archaeology and Historic Preservation (DAHP) replied April 11, 2024 with their concurrence on the Section 106 Determinations of Eligibility (DOEs) and Adverse Effect determination for the WSLE Project.
- Development of the Programmatic Agreement: To resolve the adverse effects to historic properties, FTA will initiate consultation on a Programmatic Agreement (PA) for the WSLE Project. A concept draft outlining a recommended format and structure for the PA will be distributed to Consulting Parties for review and comment. These comments will inform the formal draft of the PA, which will be published with the Final Environmental Impact Statement (EIS). The draft PA will be finalized through ongoing consultation following publication of the Final EIS. The PA will be executed prior to FTA issuing the Record or Decision (ROD) for the Project.

Section 106 consultation for the WSLE Project is ongoing with the identification and outreach to additional Section 106 Consulting Parties, including owners of properties where adverse effects have been identified. Participation as a Consulting Party is optional but provides opportunities for input to identify measures to resolve adverse effects to historic properties as part of the development of the PA. Stipulations in the PA will outline processes for continued consultation, phasing of additional historic property identification, evaluation, effect determination, and mitigation in accordance with 36 CFR Part 800.

FTA and Sound Transit are also committed to sharing information and inviting feedback from the general public, where appropriate. Sound Transit, in coordination with FTA, have hosted virtual and in-person open house events to provide an opportunity for public input on efforts to research and identify historic properties in and near the APE. Reports on historic properties will be made available to the general public for review with release of the NEPA Final EIS. The Draft PA, once completed, will be made available to the public with publication of the Final EIS. Documentation that includes sensitive information exempt from the Freedom of Information Act will not be readily available for public review, pursuant to Section 304 of NHPA.

From: Colleen Raymond <colleen@boyeravenue.com>

**Sent:** Friday, June 7, 2024 11:10 AM

To: Littauer, Erin (FTA)
Cc: Nate Highlander

**Subject:** RE: Invitation to Consult- Section 106 of the National Historic Preservation Act- West

Seattle Link Extension Project

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Thank you, Erin for your email. Yes. We do wish to participate as a Consulting Party. Please keep us informed.

Colleen Raymond Partner TCMM LLC

From: Littauer, Erin (FTA) <erin.littauer@dot.gov>

Sent: Wednesday, June 5, 2024 5:19 PM

To: Colleen Raymond <colleen@boyeravenue.com>

Subject: Invitation to Consult- Section 106 of the National Historic Preservation Act- West Seattle Link Extension Project

#### Dear TCMM LLC:

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the SODO neighborhood to West Seattle, known as the West Seattle Link Extension (WSLE) Project and is expected to receive federal funding through the Federal Transit Administration (FTA). FTA, as Lead Federal agency, has determined the WSLE project to be a Federal undertaking and therefore subject to environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). Under Section 106 and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, FTA must consider the effects of the Project on historic properties and resolve those effects through consultation with a variety of interested and affected parties. FTA has determined the structures located at 3648 E Marginal Way S. in Seattle, Washington (AM Castle and Company) is a historic property and will be adversely affected by the WSLE Project. The attached serves as an invitation to you, as the property owner, to participate as a Consulting Party in the Section 106 process for the WSLE Project. Participation is voluntary.

Please let me know if you have any questions about this invitation, the WSLE Project, or the role of consulting parties in the Section 106 process.

Thank you,

Erin Littauer
Environmental Protection Specialist
Federal Transit Administration- Region 10
U.S. Department of Transportation
Erin.littauer@dot.gov | www.transit.dot.gov



From: Alan T McMurray <alantmcmurray@gmail.com>

**Sent:** Tuesday, June 11, 2024 4:31 PM

To: Littauer, Erin (FTA)
Cc: Marilyn Kennell

**Subject:** Section 106 Consulting Party for WSLE Invitation Acceptance

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

### Dear Erin:

Please let this email serve as acceptance of the invitation to participate as a Section 106 Consulting Party for the West Seattle Link Extension

Project for both myself, Alan McMurray (<u>alantmcmurray@gmail.com</u>) and my wife Marilyn Kennell (<u>mkennell@gmail.com</u>).

Thank you so much,

Alan McMurray Cettolin House 4022 32nd Ave SW Seattle, WA 98126 425-876-3333 This page is intentionally left blank.

From: Charles Irish <cairish1948@gmail.com>
Sent: Wednesday, June 12, 2024 9:19 AM
To: Littauer, Erin (FTA); Charles Irish; Scott Rice
Subject: Section 106 -West Seattle Link Extension Project

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Eric, June 12,2024

Reference structure 45 South Spokane Street Nelson Iron Works, Blacksmith and Machinist Shop. is a historical property. (Receivded June 11, 2024)

I would appreciate speaking with you in a timely manner.

Please include in participating in the conversation around resolving adverse effects from Project activities.

My family recently moved to Williamsburg, Virginia (EST) and am currently in a transitional stage concerning the building.

Charles Irish 206 351 0444 <u>cairish1948@gmail.com</u> 137 Southern Hills, Williamsburg, VA 23188

I will be in Seattle from June 18-25, 2024

This page is intentionally left blank.

From: Daniel O'Malley <omalley@bladegallery.com>

**Sent:** Thursday, June 20, 2024 5:25 PM

**To:** Littauer, Erin (FTA)

**Subject:** Re: Invitation to Consult- Section 106 of the National Historic Preservation Act- West

Seattle Link Extension Project

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Thank you for your email regarding our historic property at 3628 E Marginal Way S, Seattle, WA 98134. It is our understanding that the building is in the proposed path for Lightrail. This obviously causes significant issues that both adversely affect our company and our property. We are eager to participate as a consulting party in the Section 106 process and are hoping once again that the light rail path can be slightly modified so as to allow us to stay in our beautiful building.

The best person for contact is:

Daniel O'Malley - omalley@bladegallery.com

Please let me know if there is anything further we might need to do.

Sincerely,

Daniel O'Malley President, BladeGallery Inc

www.bladegallery.com | www.epicedge.com | www.bladeconnection.com | www.shaveenvy.com

On Wed, Jun 5, 2024 at 5:39 PM Littauer, Erin (FTA) < <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>> wrote:

Dear Redwall LLC:

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to expand Link light rail transit service from the SODO neighborhood to West Seattle, known as the West Seattle Link Extension (WSLE) Project and is expected to receive federal funding through the Federal Transit Administration (FTA). FTA, as Lead Federal agency, has determined the WSLE project to be a Federal undertaking and therefore subject to environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (Section 106). Under Section 106 and its implementing regulations at 36 Code of Federal Regulations (CFR) Part 800, FTA must consider the effects of the Project on historic properties and resolve those effects through consultation with a variety of interested and affected parties. FTA has determined the structures located at 3628 E Marginal Way S in Seattle, Washington (Edwards Ice Machine Co./ Eagle Metal Co.) is a historic property and will be adversely affected by the WSLE Project. The attached serves as an invitation to you, as the property owner, to participate as a Consulting Party in the Section 106 process for the WSLE Project. Participation is voluntary.

Please let me know if you have any questions about this invitation, the WSLE Project, or the role of consulting parties in the Section 106 process.
Thank you,
Erin Littauer
Environmental Protection Specialist
Federal Transit Administration- Region 10
U.S. Department of Transportation
Erin.littauer@dot.gov   www.transit.dot.gov

From: Stevenson, Alex <alex.stevenson@soundtransit.org>

**Sent:** Thursday, July 25, 2024 1:12 PM

To: Yellin, Michelle; Gray, Connie; Swank, Alisa; Swift, Lauren

Subject: [EXTERNAL] FW: FTA- E-106 -Sound Transit West Seattle Link Extension Project -

Adverse Effect Determination/ Programmatic Agreement/Consultation Request

See note from Erin re: updates to tech report.

Alex E. Stevenson

Manager - Cultural Resources Sound Transit Mobile: 206-419-5315

Pronouns: He/Him/His

Connect with us

<u>facebook.com/SoundTransit</u> <u>twitter.com/SoundTransit</u>



From: Littauer, Erin (FTA) <erin.littauer@dot.gov>

Sent: Thursday, July 25, 2024 1:10 PM

**To:** Stevenson, Alex <alex.stevenson@soundtransit.org>

Subject: FW: FTA- E-106 -Sound Transit West Seattle Link Extension Project - Adverse Effect Determination/

Programmatic Agreement/Consultation Request

**CAUTION:** This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Hi Alex, See attached transmittal to ACHP for WSLE. Please update the text in the document as appropriate for record of this consultation.

**Thanks** 

Erin

From: Littauer, Erin (FTA) < <a href="mailto:erin.littauer@dot.gov">erin.littauer@dot.gov</a>>

**Date:** Friday, June 28, 2024 at 4:18 PM

To: e106 < e106@achp.gov >

**Cc:** Bill Marzella <a href="marzella@achp.gov">bmarzella@achp.gov">bmarzella@achp.gov</a>, Elizabeth Breiseth <a href="marzella@achp.gov">elizabeth.breiseth@dot.gov</a>, Assam, Mark

(FTA) < Mark. Assam@dot.gov >, Wardlaw, Dennis (DAHP) < dennis.wardlaw@dahp.wa.gov >, Elenga,

Maureen (DAHP) < maureen.elenga@dahp.wa.gov >

**Subject:** [External] FTA- E-106 -Sound Transit West Seattle Link Extension Project - Adverse Effect

Determination/ Programmatic Agreement/Consultation Request

Hello,

Pursuant to 36 CFR 800.6(a)(1), the Federal Transit Administration requests ACHP review of the e106 form and related documentation prepared for the Sound Transit West Seattle Link Extension Project (the undertaking) located in Seattle, King County, Washington. As lead federal agency, FTA, in coordination with Sound Transit and in consultation with the Washington SHPO, Tribes, and consulting parties, has determined the proposed undertaking will have an adverse effect to historic properties. In accordance with 36 CFR 800.14(b)(3), a Programmatic Agreement (PA) will be developed for the Project. With this notice, FTA invites the ACHP to participate in the Section 106 consultation process and development of the PA for the West Seattle Link Extension Project.

Due to file size limitations, additional attachments are available for download through the FTA <u>Secure Large File Transfer System (SLFTS)</u>. Access to SLFTS is user specific and password protected (instructions for first time users attached). Please let me know if you have any difficulties accessing attachments or require more information.

Thank you for your review.

Erin Littauer
Environmental Protection Specialist
Federal Transit Administration- Region 10
U.S. Department of Transportation
Erin.littauer@dot.gov | www.transit.dot.gov

From: Schreck, Jennifer < jennifer.schreck@soundtransit.org>

**Sent:** Wednesday, July 3, 2024 3:10 PM **To:** Yellin, Michelle; Gray, Connie

Subject: [EXTERNAL] Fwd: West Seattle Link Extension Section 106 Programmatic Agreement

DRAFT 1

### Get Outlook for iOS

From: Schreck, Jennifer

Sent: Wednesday, July 3, 2024 12:29:04 PM

**To:** Sodt, Sarah <Sarah.Sodt@seattle.gov>; de Lange, Michael <Michael.deLange@seattle.gov>; Chasanov, Amy <Amy.Chasanov@seattle.gov>; Lisa Howard lisa@pioneersquare.org>; Chris Moore <Chris@preservewa.org>;

Dennis.Wardlaw@dahp.wa.gov < Dennis.Wardlaw@dahp.wa.gov >; Houser, Michael (DAHP)

<Michael.Houser@dahp.wa.gov>; Elenga, Maureen (DAHP) <maureen.elenga@dahp.wa.gov>

**Cc:** Littauer, Erin (FTA) <erin.littauer@dot.gov>; Assam, Mark (FTA) <mark.assam@dot.gov>; Ann Costanza <acostanza@anchorenv.com>; Stevenson, Alex <alex.stevenson@soundtransit.org>; Durkin, Cassandra <cassandra.durkin@soundtransit.org>; Swift, Lauren <lauren.swift@soundtransit.org>; Hayes, Dezerae

Subject: West Seattle Link Extension Section 106 Programmatic Agreement DRAFT 1

### Hello Consulting Parties -

In coordination with FTA, Sound Transit is providing the first draft of the West Seattle Link Extension Section 106 Programmatic Agreement (Draft 1) for review. This first draft agreement has been prepared by FTA and ST and is the result of ongoing Section 106 consultation with the Department of Archaeology and Historic Preservation (DAHP), federally recognized Tribes (Consulting Tribes), and additional Consulting Parties. The documents can be found in the SharePoint link: July 3, 2024.

The Draft 1 agreement has been developed to resolve known adverse effects to historic built environment resources and detail processes for addressing potential adverse effects to archaeological resources which have not yet been identified. Additionally, the agreement defines roles and responsibilities for FTA, DAHP, Consulting Tribes and other Consulting Parties in the Section 106 process and details ongoing participation through the life of the project.

### FTA and Sound Transit request your review and comment of the Draft 1 agreement by July 19, 2024.

FTA and Sound Transit will provide a walk-through of the agreement document at the next scheduled Consulting Party meeting on July 9<sup>th</sup>. A separate check-in will be provided July 8<sup>th</sup> for Consulting Tribes, as needed. The walk-through meeting will provide opportunity for discussion and verbal feedback on the document. However, we request comments from your agency, organization or Tribe be captured in the attached comment matrix document.

Please utilize one comment matrix for your agency, organization or Tribe and identify each entry by reviewer, if multiple. Also, where applicable, please include reference to the line and page number in the Draft 1 agreement for comments.

Please submit the comment matrix document to Alex Stevenson at <a href="mailto:alex.stevenson@soundtransit.org">alex.stevenson@soundtransit.org</a> by July 19, 2024. FTA and ST will review all feedback following this initial draft review and prepare a second Draft (Draft 2) agreement to be circulated with DAHP, Consulting Tribes and other Consulting Parties for comment. The Draft 2

agreement will also be published with the West Seattle Link Extension Final Environmental Impact Statement (EIS) to solicit public comment as required per 36 CFR 800. The Draft 2 agreement will continue to evolve through subsequent draft versions through ongoing consultation for the Project.

Thank you for your continued participation in the Section 106 consultation process for the WSLE Project as we continue to collaborate in developing a final Programmatic Agreement for the Project. FTA and Sound Transit look forward to your comments.

### Jennifer Schreck

Senior Cultural Resource Specialist Pronouns: She/Her/Hers PEPD Sound Transit M 360-878-0624 D 206-665-8176

Connect with us <u>facebook.com/SoundTransit</u> <u>twitter.com/SoundTransit</u>





July 15, 2024

Mark A. Assam Environmental Protection Specialist Region 10 Federal Transit Administration 915 Second Avenue, Suite 3192 Seattle, WA 98174-1002

Ref: West Seattle Link Extension

Seattle, King County, Washington ACHP Project Number: 021176

#### Dear Mr. Assam:

On July 1, 2024, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the potential adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this undertaking. Accordingly, we do not believe our participation in the consultation to resolve adverse effects is needed.

However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Should the undertaking's circumstances change, consulting parties cannot come to consensus, or you need further advisory assistance to conclude the consultation process, please contact us.

Pursuant to Section 800.6(b)(1)(iv), you will need to file the final Section 106 agreement document (Agreement), developed in consultation with the Washington SHPO and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions or require our further assistance, please contact Bill Marzella at (202) 517-0209 or by e-mail at

bmarzella@achp.gov and reference the ACHP Project Number above.

Sincerely,

Dana Daniels

Historic Preservation Technician Office of Federal Agency Programs

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From: Stevenson, Alex <alex.stevenson@soundtransit.org>

**Sent:** Thursday, July 18, 2024 10:30 AM

To: Charles Irish

Cc:Scott Rice; Littauer, Erin; Wu, Phoebe; Hampton, Jason; Ann CostanzaSubject:[EXTERNAL] RE: Section 106 -West Seattle Link Extension Project

Good morning Mr. Irish,

Thank you again for your time on the phone in late June to discuss Section 106 consulting party status and the status of the West Seattle Link Extension (WSLE) project. As Jason and I discussed with you, there was a error made when we in coordination with the Federal Transit Administration (FTA) identified your property as adversely affected under Section 106 of the National Historic Preservation Act. In fact, there will no Section 106 adverse effect to your property with the existing preferred alternative alignment for the West Seattle Link extension project. As such, you would not be considered a party for Section 106 consultation. Sound Transit will continue to coordinate with you as we have in the past and if there are additional concerns you have related to environmental review on the project you can always engage with Sound Transit and FTA via the National Environmental Policy Act (NEPA).

Please do let me know if you have any questions or concerns. For any project-related inquiries, feel free to reach out to Phoebe Wu phoebe.wu@soundtransit.org, copied here, she is the senior engagement specialist for WSLE.

I hope you are well!

Alex

Alex E. Stevenson Manager - Cultural Resources Sound Transit Mobile: 206-419-5315

Pronouns: He/Him/His

Connect with us facebook.com/SoundTransit twitter.com/SoundTransit



From: Charles Irish <cairish1948@gmail.com> Sent: Wednesday, June 12, 2024 9:19 AM

To: Littauer, Erin <erin.littauer@dot.gov>; Charles Irish <cairish1948@gmail.com>; Scott Rice <rsrice@hotmail.com>

Subject: Section 106 -West Seattle Link Extension Project

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Eric. June 12.2024

Reference structure 45 South Spokane Street Nelson Iron Works, Blacksmith and Machinist Shop. is a historical property. (Receivded June 11, 2024)

I would appreciate speaking with you in a timely manner.

Please include in participating in the conversation around resolving adverse effects from Project activities. My family recently moved to Williamsburg, Virginia (EST) and am currently in a transitional stage concerning the building.

Charles Irish 206 351 0444 <u>cairish1948@gmail.com</u> 137 Southern Hills, Williamsburg, VA 23188

I will be in Seattle from June 18-25, 2024