Ballard Link Extension Scoping Summary Report

February 2025

Sound Transit



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Acronyms and Abbreviations

CID Chinatown-International District
EIS Environmental Impact Statement
EPA U.S. Environmental Protection Agency

FTA Federal Transit Administration
NEPA National Environmental Policy Act

SCIDpda Seattle Chinatown International District Preservation and Development Authority

SEPA State Environmental Policy Act

WSBLE West Seattle and Ballard Link Extensions

Summary

S.1 Purpose

The Federal Transit Administration (FTA) and Sound Transit conducted scoping for the Ballard Link Extension Project (the project) in Seattle, Washington, from October 24 through December 9, 2024, under the National Environmental Policy Act (NEPA). This report describes how FTA and Sound Transit conducted scoping and summarizes the comments received from government entities (agencies and educational institutions), Tribes, businesses, community organizations, and the public during the scoping period. This information will be considered by FTA and Sound Transit as they consider refinements to the project Purpose and Need, identify alternatives to be studied in the Environmental Impact Statement (EIS), and identify environmental resources to study in the EIS.

S.2 The Scoping Process

Scoping for the project was conducted under NEPA in accordance with applicable regulations and guidance. The FTA is the lead federal agency under NEPA.

The NEPA scoping process began with formal notices to prepare an EIS. A Notice of Intent to prepare an EIS was published by FTA in the *Federal Register* on October 24, 2024. Public notification was provided through a variety of methods including multiple listserv emails, ads in local publications, a media advisory, and social media posts.

Two public scoping meetings were held during this period, as well as an online open house from October 24 through December 9, 2024. FTA and Sound Transit asked for comments on the draft Purpose and Need statement; the alternatives that should be evaluated in the EIS; and social, economic, environmental, and transportation issues to evaluate in the EIS. Comments were accepted by mail, email, online comment forms, transcribed phone messages, and through comment forms and via a court reporter at the scoping meetings.

S.3 Government Entity Scoping Comments

FTA and Sound Transit invited 33 agencies to participate during the EIS scoping process. Seven government entities (agencies and educational institutions) submitted scoping comments, which spanned a variety of topics, including the following:

- Alternatives to study in the EIS
- Environmental justice

Impacts to government facilities and properties

- Impacts to maritime and industrial businesses
- Areas where permitting and agency coordination are needed
- Specific recommendations on potential environmental issues to study in the EIS

¹ For information on the scoping process for the West Seattle and Ballard Link Extensions initiated in 2018, see Section 1.1, Overview.

S.4 Tribal Consultation During Scoping

FTA invited six federally recognized Tribes to participate in the environmental review process and attend scoping meetings via letters sent on October 25, 2024. Sound Transit also invited by letter two non-federally recognized Tribes to participate in the scoping process and attend scoping meetings. No comments were received from any Tribes during the scoping period.

S.5 Businesses and Organizations Scoping Comments

Comments were received from seven businesses and business organizations and ten community organizations, on topics that included the following:

- Preferences for alternatives, primarily in the Chinatown-International District/SODO and Downtown segments
- Potential neighborhood impacts during construction and operations
- Cumulative impacts for multiple construction projects throughout the project corridor
- Environmental justice concerns in Pioneer Square and Chinatown-International District
- Acquisitions/property impacts
- Construction impacts to the Chinatown-International District/SODO and Downtown segments, particularly related to the duration of construction, construction traffic and concurrent closures throughout these segments for multiple stations, and impacts to businesses near construction sites and road closures
- Potential for transit-oriented development at and around stations
- Ease of transfers between Link light rail lines and station accessibility, particularly in the Chinatown-International District and Pioneer Square neighborhoods
- Specific recommendations on potential environmental issues to study in the EIS
- Requests for more specific information on mitigation measures

S.6 General Public Scoping Comments

Approximately 180 people attended the two public scoping meetings, and approximately 9,600 people accessed the online open house during the comment period. Sound Transit received around 140 individual communications (where each communication may contain one or more comments) from the general public in various formats. The major public comment themes that applied to the entire project included the following:

- General support for transit and the project
- Preference for tunnels
- That this is infrastructure that will last for generations and it is critical to build it right
- Shorten the planning/review process do not delay
- Extend the Draft EIS comment period to 90 days
- Provide efficient multi-modal transportation access at the stations

In the Chinatown-International District/SODO Segment, many comments expressed concern about impacts to the neighborhood from construction (including traffic, noise, and air quality), direct and indirect displacement of residents and businesses, and the need for additional environmental justice/equity analysis. Of commenters that expressed a preference, most favored a station located on 4th Avenue South for the potential opportunity to improve transfers to Sounder commuter rail, King Street Station, and the existing light rail lines and to create an efficient multi-modal hub at the International District/Chinatown Station. A few comments supported the preferred alternative station location to limit potential construction impacts to the Chinatown-International District neighborhood. A few comments supported the 5th Avenue station location, while other comments requested removing the 5th Avenue South alternatives from consideration, citing that they are "culturally infeasible to build." Several comments were received from InScape Arts Building expressing concern about construction next to them of the preferred International District/Chinatown Station.

Most comments on the Downtown Segment were about construction impacts, particularly road closures and construction of multiple stations concurrently, and noise and vibration. Some comments supported the alternative with the Midtown Station closer to Madison Street. A few others were opposed to the location of the Midtown Station for the preferred alternative, because it would displace the Reynolds Reentry Center. Reynolds Reentry Center is the only reentry facility in King County that houses only men as they complete their sentences. The center houses men from all over Washington and provides services such as employment assistance and counseling to transition them into the community when their sentence is complete.

In the South Interbay and Interbay/Ballard segment, most comments were about station location, the Salmon Bay crossing type, and the alignment in Ballard. In the South Interbay Segment, a few comments requested a tunnel under Elliott Avenue West. In the Interbay/Ballard Segment, a few comments supported a tunnel under Salmon Bay and a Ballard Station on 15th Avenue Northwest.

Comments that were not specific to a geography included community outreach, project cost and funding concerns, project schedule, recommendations for alternative technology, and future extensions.

S.7 Next Steps

The comments received during scoping will help inform the Purpose and Need for the project and identify issues to be considered in the Draft EIS. Comments will also help inform the Sound Transit Board's confirmation or modification of a preferred alternative and the other alternatives FTA and Sound Transit will study in the EIS. The EIS will describe the potential benefits and adverse effects of each alternative and will outline potential ways to avoid, minimize, or mitigate adverse effects. FTA and Sound Transit are planning to issue the Draft EIS for the Ballard Link Extension Project for public and agency review in 2025. The Draft EIS will be available for a public comment period that will include public hearings. After the close of the Draft EIS public comment period, the Sound Transit Board will consider public comments as well as the information in the Draft EIS and then confirm or modify the preferred alternative for evaluation in the Final EIS. The Final EIS is planned to be published in 2026. It will respond to comments received on the 2022 West Seattle and Ballard Link Extensions Draft EIS as well as the upcoming Ballard Link Extension Draft EIS and outline mitigation for unavoidable significant impacts. After publication of the Final EIS, the Sound Transit Board will select the project to build. FTA is then expected to prepare a Record of Decision that documents the project that Sound Transit will build and how it will avoid, minimize, and mitigate environmental impacts.

1 Introduction

1.1 Overview

Sound Transit (the Central Puget Sound Regional Transit Authority) is proposing to expand Link light rail transit service from SODO to Ballard. The Ballard Link Extension Project (the project) is a 7.7-mile long corridor in the city of Seattle in King County, Washington, the most densely populated county of the Puget Sound region. The Ballard Link Extension would include a new 3.3-mile light rail-only tunnel from south of the Chinatown-International District to South Lake Union and Seattle Center/Uptown. Stations would serve the following areas: Chinatown-International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

The project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016 (Sound Transit 2016). Sound Transit and the Federal Transit Administration (FTA) are preparing an Environmental Impact Statement (EIS) as a joint National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) document. FTA is the lead federal agency under NEPA and Sound Transit is the lead agency for SEPA.

A Draft EIS that included the project was published in January 2022. That Draft EIS evaluated both the Ballard Link Extension and West Seattle Link Extension together as one West Seattle and Ballard Link Extensions Project (WSBLE). The extensions were evaluated together in the WSBLE Draft EIS because of their location, schedule, and review efficiencies for partner agencies. SEPA early scoping for the WSBLE project occurred in 2018. FTA published a Notice of Intent in the *Federal Register* on February 12, 2019, initiating the formal scoping process under NEPA for the WSBLE Project which concluded April 2, 2019.

In July 2022, the Sound Transit Board directed that further studies be prepared for the Ballard Link Extension, to evaluate additional station options and other refinements (Motion M2022-57). Some of these project options and refinements required additional conceptual engineering and environmental review. Rather than delay completion of the environmental review process for the West Seattle Link Extension while additional review was conducted for the Ballard Link Extension, Sound Transit and FTA decided to move forward under separate environmental reviews for each extension. The two extensions will operate as separate lines, and the extensions are standalone projects with independent utility. Because the environmental review processes were separated for the two extensions, FTA required preparation of a new Notice of Intent and a new Draft EIS under NEPA. Nonetheless, the new Ballard Link Extension Draft EIS will build on the environmental analysis already completed and include an evaluation of the station options and other refinements requested in 2022 by the Sound Transit Board. Under SEPA, the Ballard Link Extension Draft EIS will be a Supplemental Draft EIS, supplementing the work already completed in the WSBLE Draft EIS. Except where otherwise noted, references to a Draft EIS in this document refers to the new Ballard Link Extension NEPA Draft EIS/SEPA Supplemental Draft EIS.

The project's transit mode and service corridor were identified through the years-long planning process for the Sound Transit Regional Transit Long-Range Plan and Sound Transit 3 Plan (Sound Transit 2014 and 2016). After voter approval for funding the Sound Transit 3 Plan, Sound Transit completed an Alternatives Development process that included three levels of screening to identify alternatives to study in the WSBLE Draft EIS. After each screening analysis was complete, the results were presented to the Stakeholder Advisory Group and an Elected

Leadership Group for feedback. The Stakeholder Advisory Group was composed of consisted of transit riders, residents, key stakeholders, members of the public, and representatives from businesses and major institutional organizations. The Elected Leadership Group included elected officials who represented the project corridor and/or Sound Transit Board. These groups each made recommendations on which alternatives to carry forward to the next screening level. Opportunities for public input were provided between each screening level and feedback was shared with the two groups. This allowed community members to learn more about the alternatives and provide input alongside the Stakeholder Advisory Group and Elected Leadership Group. Following the public scoping period for the WSBLE Draft EIS, the Sound Transit Board reviewed the comments received and the alternatives evaluated in the three-level screening process. In May and October 2019, the Board identified alternatives to study in the WSBLE Draft EIS.

Tribal, public, and agency comments on the WSBLE Draft EIS suggested modifying the alternatives or adding other alternatives. Sound Transit evaluated these modified and other alternatives for the project. In July 2022 the Sound Transit Board directed additional public and stakeholder engagement and preparation of further studies for the Ballard Link Extension. In March and July 2023, following completion of further studies, the Board identified preferred alternatives, refinements to other alternatives, and additional alternatives to study in the Ballard Link Extension EIS.

Table 1-1 lists the alternatives identified to date to be studied in this EIS and the key design changes to alternatives since the WSBLE Draft EIS as applicable. The project is broken into smaller geographic areas called segments and has four segments (Chinatown-International District/SODO, Downtown, South Interbay, and Interbay/Ballard). Figures 1-1 through 1-4 show the alternatives in each segment.

Table 1-1. Ballard Link Extension Alternatives

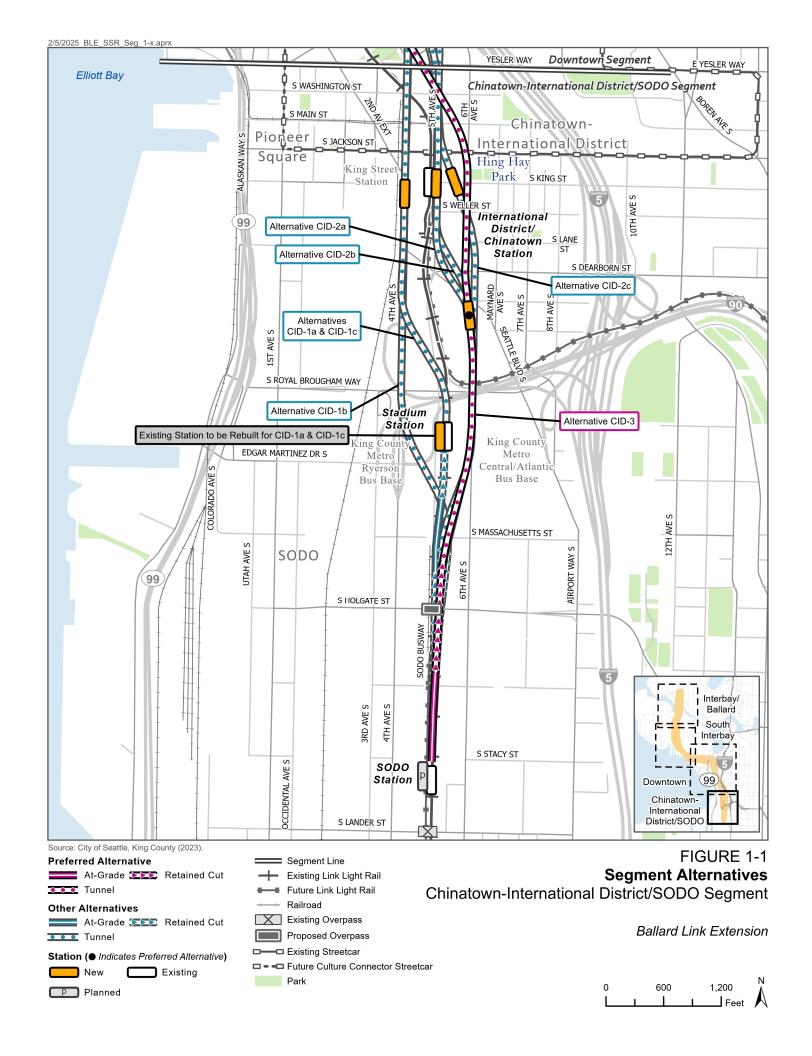
Segment	Alternative	Key Design Changes Since WSBLE Draft EIS
Chinatown-	Preferred Dearborn Street (CID-3)	New alternative
International District	4th Avenue Shallow (CID-1a)	None
(CID)/SODO	4th Avenue Deep (CID-1b)	None
	4th Avenue Shallower (CID-1c)	New alternative
	5th Avenue Shallow (CID-2a)	None
	5th Avenue Deep (CID-2b)	None
	5th Avenue Shallow Diagonal (CID-2c)	None [a]
Downtown (DT)	Preferred 5th Avenue/Harrison Street Refined (Connects to Preferred CID/SODO Alternative) (DT-3a)	New alternative
	5th Avenue/Harrison Street (DT-1)	Denny Station south entrance shifted into 8th Avenue right-of-way
	6th Avenue/Mercer Street (DT-2)	None
	5th Avenue/Harrison Street Refined (Connects to Other CID/SODO Alternatives) (DT-3b)	New alternative
	5th Avenue Consolidated Denny/South Lake Union Station (DT-4)	New alternative

Segment	Alternative	Key Design Changes Since WSBLE Draft EIS
South Interbay (SIB)	Preferred Galer Street Station/Central Interbay (SIB-1)	Minor refinements to curves and guideway columns between tunnel portal and Smith Cove Station; guideway profile change and incorporation of maintenance access road along Interbay Golf Center; relocated special trackwork
	Prospect Street Station/15th Avenue (SIB-2)	None
	Prospect Street Station/Central Interbay (SIB-3)	Guideway profile change and incorporation of maintenance access road along Interbay Golf Center
Interbay/Ballard (IBB)	Preferred Tunnel 15th Avenue (IBB-2b)	Interbay Station shifted south straddling West Dravus Street; guideway and tunnel portal shifted west between Thorndyke Avenue West and the BNSF Railroad; Ballard Station entrances refined to remove southern entrance
	Elevated 14th Avenue (IBB-1a)	None
	Elevated 14th Avenue (from Prospect Street Station/15th Avenue) (IBB-1b)	None
	Tunnel 14th Avenue (IBB-2a)	None
	Elevated 15th Avenue (IBB-3)	Bridge over Salmon Bay designed to have greater maximum clearance over the navigation channel

[[]a] This alternative was the 5th Avenue Shallow Diagonal Station Configuration in the WSBLE Draft EIS.

1.2 Purpose of Report

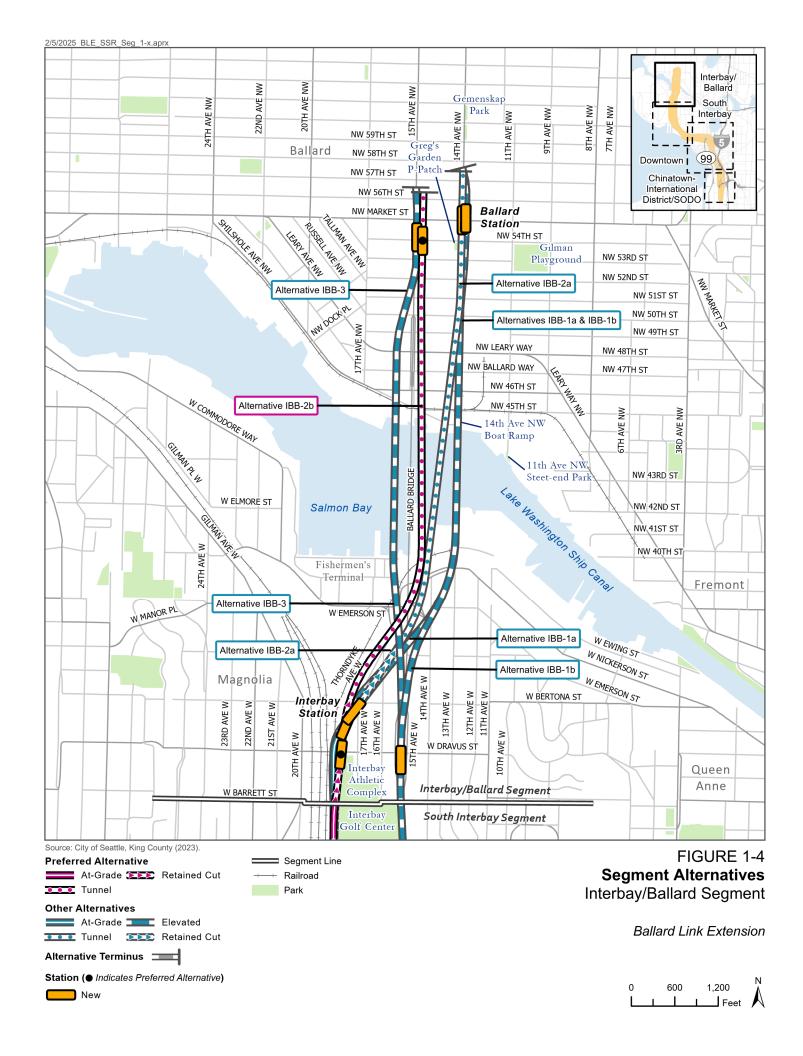
FTA and Sound Transit conducted scoping for the new Draft EIS from October 24 through December 9, 2024, under NEPA. This report describes how FTA and Sound Transit conducted scoping and summarizes the comments received from government entities (agencies and educational institutions), Tribes, businesses, community organizations, and the public during the scoping period. This information will be considered by FTA and Sound Transit as they consider refinements to the project Purpose and Need and identify alternatives and environmental resources to study in the EIS.





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2 The Scoping Process

2.1 Purpose of Scoping

Scoping is an early step in the NEPA process. The purpose of scoping is to inform the public of the proposed project and the Purpose and Need for the project, seek public comment on the range of potential alternatives, and collect feedback from partner agencies, Tribes, and the public on the scope of the environmental issues to study during the EIS process. During scoping, Sound Transit asked for comments from the public, agencies and Tribes on:

What is a Purpose and Need Statement?

A Purpose and Need Statement defines the objectives that project alternatives must meet. FTA and Sound Transit use the Purpose and Need Statement to develop and evaluate project alternatives for analysis during environmental review.

- The draft Purpose and Need statement
- The alternatives that Sound Transit should evaluate in the EIS
- Social, economic, environmental, and transportation issues to evaluate in the EIS

Scoping for the Ballard Link Extension was conducted under NEPA in accordance with applicable regulations and guidance. The FTA is the lead federal agency under NEPA.

2.2 Public Notices in the Federal Register

The scoping process began with formal notices to prepare an EIS. For NEPA, a Notice of Intent to prepare an EIS was published by FTA in the *Federal Register* on October 24, 2024. This notice initiated scoping and started a comment period that extended through December 9, 2024. Copies of the public notices are provided in Appendix A (Public Notices).

2.3 Opportunities for Public, Agencies, and Tribes to Comment

Sound Transit accepted comments by U.S. mail to Ballard Link Extension, c/o Lauren Swift, Sound Transit, 401 South Jackson Street, Seattle, Washington 98104-2826; by email to blescopingcomments@soundtransit.org; through an online comment form at https://ballardlink.participate.online/; by voicemail transcribed at 206-903-7223; verbally transcribed by court reporter at open houses; and in writing. Sound Transit also hosted public scoping meetings on the following dates:

- Thursday, November 7, 2024, in Downtown
- Wednesday, November 13, 2024 in Ballard

An online open house was hosted at https://wsblink.participate.online from Thursday, October 24 through Monday, December 9, 2024.

Meeting advertisement samples are provided in Appendix A, NEPA Scoping Public Involvement Summary. Copies of agency scoping comments are provided in Appendix B, Government Entity Comments; copies of business and business organization comments are provided in Appendix C, Business and Business Organization Comments; and comments submitted by community organizations are provided in Appendix D, Community Organization Comments. Copies of public scoping comments are provided in Appendix E, Public Comments.

2.4 Background Materials

Sound Transit produced the following publications to provide additional information about the Ballard Link Extension Project and how the EIS would be conducted:

- Project folio
- System Expansion folio
- Purpose and Need handout
- Scoping Information handout
- Ballard Link Extension Further Studies Executive Summary
- WSBLE Draft EIS Appendix M, Alternatives Development

Sound Transit posted all publications to the project website (https://wsblink.participate.online/ and https://www.soundtransit.org/system-expansion/west-seattle-ballard-link-extensions) prior to scoping, and they were available at the public scoping meetings. Open house meeting guides were also available at all open house meetings. Information on previous local planning activities, including Sound Transit 3 planning, were also available on Sound Transit's website.

3 Agency Scoping Comments

Table 3-1, Summary of Government Entity Comments, lists the agencies that commented during scoping and summarizes the major themes in their comments. The summaries in this section focus on recommendations or suggestions on alternatives to study in the EIS, other key issues identified, and a list of environmental resource categories with which the agency had concerns. Government entities include federal, state, regional, and local agencies; educational institutions; and agency oversight/advisory boards and commissions. Copies of the comment letters are provided in Appendix D, Government Entity Comments.

Table 3-1. Summary of Government Entity Comments

Agency/ Institution	Major Comment Themes			
Federal	Federal			
U.S. Environmental Protection Agency (EPA), Region 10	EPA submitted comments expressing support for the project goals and referred to comments submitted for the WSBLE Project in 2019 and 2022. They note the preferred alternative in the area of Salmon Bay is consistent with their previous recommendations and it addresses some of their previous concerns. EPA gave specific suggestions on EIS analysis related to hazardous materials and contaminated sites, aquatic resources, air quality, environmental justice, and climate change. EPA suggested consideration of green infrastructure building opportunities. They also recommended addressing Tribal treaty resources in the EIS and consultation with affected Tribal governments.			
State				
Washington State Department of Corrections (Reynolds Reentry Facility)	The Washington State Department of Corrections submitted comments regarding their concern over displacement of the building at 410 4th Avenue South for their Reynolds Reentry Center, which has been located there since 1978. The site serves as a facility for people to transition from prison to the King County community and has served over 10,000 people. They note the amenities their facilities are required to provide and the facility siting process. They also provide information about their recent unsuccessful attempts to site an additional facility in King County.			
Regional				
Port of Seattle and Northwest Seaport Alliance	The Port of Seattle and Northwest Seaport Alliance summarized their involvement to date as a cooperating agency and noted comments from the Northwest Seaport Alliance apply only to the SODO area. They requested consideration of regional mobility, including access to SeaTac Airport, when considering station locations where transfers between lines would occur. The noted potential direct and cumulative impacts to freight mobility in the SODO and Interbay areas that they would like evaluated.			
Puget Sound Regional Council	Puget Sound Regional Council submitted comments affirming the role of the Ballard Link Extension Project in regional planning and their support for high-capacity transit and focused growth in growth centers served by high-capacity transit. They encouraged consideration of door-to-door travel time and ease of access and connections, particularly for those with accessibility and mobility needs. They noted the potential for displacement risk and they requested analysis of this risk and mitigation of this risk. They encourage Sound Transit to continue to find ways to mitigate impacts to local businesses and to further support businesses owned by marginalized communities that may be impacted. They support continuing to analyze transit-oriented development at stations and to look for ways to achieve equitable transit-oriented development.			

Agency/ Institution	Major Comment Themes
Local	
City of Seattle	The City of Seattle summarized their involvement to date as a cooperating agency, and affirmed support for the project's purpose and need, alternatives to be studied, and types of impacts to be studied in the EIS. They requested the EIS fully analyze the cumulative impacts during construction of the Ballard Link Extension when considered with other simultaneously planned transportation projects throughout the region.
Educational Ins	stitutions
University of Washington	The University of Washington expressed support for the project and noted the importance of light rail in providing access to their facilities for students and employees.
	In Downtown, they are concerned with potential impacts to properties in their Downtown Metropolitan tract during operations and construction, including impacts to existing buildings as well as future underground and aboveground development rights. In South Lake Union, they are concerned with potential impacts to buildings that contain vibration- and electromagnetic-field-sensitive equipment and activities, as well as impacts to access during construction. They also expressed interest in transit-oriented development at the station location at 7th Avenue North and Harrison Street.
Advisory Boards	c/Commissions
Seattle Design Commission	The Seattle Design Commission submitted comments requesting the following be evaluated for all alternatives in the Chinatown-International District: transit-oriented development and joint development potential; station accessibility, travel times, and safe routes to stations; ability to support expanded use of Union Station; potential for indirect displacement; and impacts on small businesses and the Chinatown-International District community during operations and construction. They requested these trade-offs be clearly depicted for the public in the EIS. They also requested study of access to health care facilities on First Hill from the Midtown and International District/Chinatown stations, joint development and re-development potential for the Seattle Center and Interbay stations, minimizing park impacts at the Interbay Station, activating uses around elevated guideways and stations, and an entrance to the Ballard Station north of Northwest Market Street.

4 Tribal Consultation During Scoping

FTA invited the following federally recognized Tribes to participate in the environmental review process via scoping letters sent on October 25, 2024:

- Confederated Tribes and Bands of the Yakama Nation
- Muckleshoot Indian Tribe
- Snoqualmie Indian Tribe
- Stillaguamish Tribe of Indians of Washington
- Suquamish Indian Tribe of the Port Madison Reservation
- Tulalip Tribes of Washington

Sound Transit also invited by letter the Duwamish Tribe and the Snohomish Tribe (non-federally recognized Tribes) to participate in the scoping process.

No comments were received from Tribes during the scoping period.

5 Public Scoping

5.1 Public Scoping Meetings

Sound Transit held two public scoping meetings to provide an opportunity for the public to learn about the project and to invite comments. Approximately 9,600 people accessed the project website online during the comment period. About 180 people attended the public scoping meetings, held at the following locations:

Meeting #1	Meeting #2	
Thursday, November 7, 2024	Wednesday, November 13, 2024	
5 to 7 p.m.	5 to 7 p.m.	
Union Station 401 South Jackson Street	National Nordic Museum 2655 Northwest Market Street	

401 South Jackson Street
Seattle, Washington 98104

National Nordic Museum
2655 Northwest Market Street
Seattle, Washington 98107

5.1.1 Meeting Notification

Sound Transit advertised the scoping meetings through a variety of methods, including multiple listserv emails sent to over 12,000 subscribers, ads in local publications (including a blog post engaging over 4,300 subscribers), a media advisory, and social media posts.

Error! Not a valid bookmark self-reference., Media Advertising, summarizes the publications where online and print advertisements were placed and the dates of publication.

Table 5-1. Media Advertising

Publication	Online Run Dates
International Examiner	10/24 to 11/7
NW Asian Weekly	10/24 to 11/7
Seattle Chinese Post	10/24 to 11/7
Seattle Chinese Times	10/24 to 11/7
The Seattle Times	10/24 to 11/7

5.1.2 Public Scoping Meeting Format

Sound Transit asked public scoping meeting attendees to sign in as they arrived. Staff members at the welcome table explained the meeting's purpose and format. Comment forms were translated into Simplified and Traditional Chinese, Vietnamese, and Spanish. Meeting guides were translated into Simplified and Traditional Chinese, Vietnamese, and Spanish for the Union Station open house. Interpreters were available at the Union Station open house for Mandarin, Cantonese, and Vietnamese speakers. Court reporters and American Sign Language interpretation were available at both open houses.

The meetings were conducted as an open house with a short presentation occurring approximately 30 minutes after the meeting began. As part of the open houses, participants were invited to review displays and discuss the project with Sound Transit staff and members of the consultant team. Display boards provided information about Sound Transit, the project

history, the project environmental review process, the project Purpose and Need, opportunities for public involvement, and the project schedule.

Attendees were invited to provide scoping comments at the meeting through various methods:

- Written comment form
- Verbal comment, transcribed by a court reporter
- Typed comment via the online open house

Sound Transit is committed to equal engagement opportunities for all interested members of the public. In addition to Sound Transit community engagement procedures, Executive Order 12898, U.S. Department of Transportation Order 5610.2(a), and FTA Circular C 4703.1 require Sound Transit to provide meaningful opportunities for these groups to engage in the planning process. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin. These directives make environmental justice a part of the decision-making process by identifying and addressing disproportionately high and adverse human health and environmental effects of Sound Transit's programs, policies, and activities on minority and low-income populations.

5.2 Public Outreach to Minority, Low-Income, and Limited-English-Proficient Populations

Sound Transit's community engagement approach through alternatives development and scoping has sought to meet the unique needs of historically underrepresented populations, including low-income, immigrants and refugees, and minorities. Sound Transit conducted a preliminary demographic analysis to identify low-income, minority, and limited-English-proficiency populations. In addition, Sound Transit conducted interviews with 27 social service providers and community organizations corridor-wide prior to scoping for the 2022 WSBLE Draft EIS to better understand populations in the project area, including how minority and low-income populations might relate to the project. Based on this analysis, the Chinatown-International District is the only area along the project corridor with concentrations of minority and low-income individuals above the city average. Sound Transit used the following strategies to engage these populations during alternatives development and scoping:

- Translated key materials (handouts, presentations, display boards, comment forms, and project folios) into languages spoken in the station area, including simplified Chinese, traditional Chinese, Vietnamese, and Spanish
- Publicized events online and in print with ethnic media
- Provided Cantonese, Mandarin, and Vietnamese interpretation support at the scoping meeting held at Union Station, and at other events and community gatherings during the scoping period
- Provided translated text on the online open house web pages, as well as the embedded Google Translate tool
- Held smaller meetings focused on individual communities or organizations
- Attended community organization meetings as requested
- Met communities where they gather, including fairs and festivals, community events, and meetings

5.3 Summary of Public Comments

5.3.1 General Project

Sound Transit received around 140 individual communications (where each communication may contain one or more comments) from the general public in various formats.

Major comment themes that applied to the entire project included the following:

- General support for transit and the project.
- Preference for tunnels.
- That this is infrastructure that will last for generations and it is critical to build it right.
- Shorten the planning/review process don't delay.
- Extend the Draft EIS comment period to 90 days.
- Provide efficient multi-modal transportation access at the stations.

Copies of these communications are available in Appendix E, Public Comments.

5.3.2 Chinatown-International District/SODO Segment

Table 5-2, Summary of Public Comments Related to Chinatown-International District/SODO Segment, summarizes public comments received on the Chinatown-International District/SODO Segment.

Table 5-2. Summary of Public Comments Related to Chinatown-International District/SODO Segment

Theme of Comment	Comments/Suggestions
International District/Chinatown Station	Some comments expressed preference for the station to be located on 4th Avenue South, primarily to improve transfers to Sounder commuter rail, King Street Station, and the existing light rail line, to create an efficient multi-modal hub at the International District/Chinatown Station. Many of these comments further expressed the importance of locating the station such that transfers between the existing and new light rail lines are as efficient as possible and do not require passengers to come up to street level to transfer. (A few commenters erroneously referred to the station shown at 4th Avenue South and Jackson Street as part of the Sound Transit 3 initiative, indicating that the shown location was key in passing the initiative.)
	Some comments expressed preference for the station to be located along either 4th Avenue South or 5th Avenue South to allow for more efficient transfers between Sounder commuter rail, King Street Station, and existing Sound Transit light rail lines. A few comments supported the preferred alternative, while some comments specifically opposed the preferred alternative, with many noting concerns about walking distance/time from the Chinatown-International District neighborhood and accessibility. A few comments supported a station on 5th Avenue, while some comments requested that all 5th Avenue South alternatives be removed from consideration, citing that they are "culturally infeasible to build."
	Some comments requested a social and economic impacts study of station alternatives for the Chinatown-International District Station, and some comments included a request to "study physical, social, equity impacts to 1200+ elderly, physically challenged, non-English speaking residents for each of the alternatives" proposed for the Chinatown-International District.
	One comment mentioned the need to include independent consultant's reports on North of Chinatown-International District, South of Chinatown-International District, and original Midtown stations to compare them with the 4th Avenue Risk Study. [a]

Comments/Suggestions
Over 20 tenants of the InScape Arts Building submitted comments with concerns about construction of the preferred International District/Chinatown Station adjacent to their building, including the following:
 Air quality, dust, noise, and vibration during construction impacting usability of space in which to teach and produce art due to the historic property features (e.g., single-pane windows without screens) and therefore loss of workspace, jobs, and economic development Impacts to access to the parking lot (in which parking for tenants and their clients is needed) Impacts to the property as a historic and archaeological resource
Some of these comments were also concerned with impacts after construction, including the potential for increased property values and property taxes, increases in rent and indirect displacement, and neighborhood impacts related to transit-oriented development. Mitigation was requested for both potential impacts during construction and operations. Some comments suggested that the building be purchased by Friends of InScape to preserve it long-term for arts and culture.

[[]a] The referenced 4th Avenue Risk Study is assumed to be the presentations to the Sound Transit Board System Expansion Committee on November 14, 2024 (Peters 2024; Sound Transit 2024).

5.3.3 Downtown Segment

Table 5-3, Summary of Public Comments Related to Downtown Segment, summarizes comments received on the Downtown Segment.

Table 5-3. Summary of Public Comments Related to Downtown Segment

Theme of Comment	Comments/Suggestions
Alignment	A few comments requested studying not building a second tunnel and having the line from Ballard connect at Westlake Station.
Midtown Station	A few comments opposed the preferred alternative (specifically the Midtown Station location) as it would require demolition of 410 Fourth Avenue, which has been home to the Washington State Department of Correction's reentry program for decades.
	A few comments supported the Midtown Station location proposed in the Sound Transit 3 Plan (represented by Alternative DT-1).
South Lake Union Station	A few comments concerned maintaining pedestrian access to the 408 Aurora Avenue North apartment building during construction of this station at 7th Avenue North and Harrison Street. Other comments questioned the proposed location, citing that none of the alternatives are located within their definition of the South Lake Union neighborhood.
Seattle Center Station	One comment suggested changing the station name to something like "Uptown/Lower Queen Anne", so as not to be confused with the monorail's Seattle Center Station. One comment requested the station be as close to Climate Pledge Arena as possible.

5.3.4 South Interbay and Interbay/Ballard Segments

Table 5-4, Summary of Public Comments Related to South Interbay and Interbay/Ballard Segments, summarizes comments received on the South Interbay and Interbay/Ballard segments. The segments are discussed together because most comments referred to them collectively.

Table 5-4. Summary of Public Comments Related to South Interbay and Interbay/Ballard Segments

Theme of Comment		Comments/Suggestions
Alignment	South Interbay	One comment expressed support for the preferred Galer Street/Central Interbay alignment, as it is closest to the cruise ship terminals.
		A few comments requested a tunnel, instead of the proposed elevated track, along Elliot Avenue West. The main reason is noise resulting from construction and operations within a residential area.
	Interbay/Ballard	There was one comment in support of the tunnel alignment on 14th Avenue Northwest and one comment opposed to it.
		One comment requested an east-west line between Ballard and the University of Washington.
Stations	Interbay	One comment requested that pedestrian access to/from Magnolia be assessed, as the current sidewalk conditions along West Dravus Street might not be sufficient.
	Ballard	A few comments expressed general support of a station at 15th Avenue Northwest. One comment noted that the 15th Avenue Northwest and Northwest Market Street station would have an impact on the "catchment area". It was suggested that a shallow pedestrian tunnel from the station to 20th Avenue Northwest would alleviate that and expand ridership to the denser part of Ballard to the west. One comment suggested a "2nd station by the Ballard Library" and a few suggested the station be between 20th Avenue Northwest and 22nd Avenue Northwest.
Salmon Bay Crossing		A few comments stated support of a tunnel under Salmon Bay instead of a bridge. One comment suggested building a combined car and light rail tunnel under Salmon Bay.
Future extension		One comment suggested a possible station near Northwest 85th Street and Aurora Avenue North, as part of an elevated alignment along Aurora Avenue, before joining the 2 and 3 lines at Northgate and terminating there, leaving the potential for expansion to Lake City and Bothell. Another comment suggested a Sounder Station at Northwest 85th Street or farther north, and then extending the light rail to serve that station.

5.3.5 Environmental Concerns

Table 5-5, Summary of Environmental Concerns, summarizes comments provided on environmental concerns.

Table 5-5. Summary of Public Comments on Environmental Concerns

Theme of Comment	Comments/Suggestions
Air Quality and Climate Change	Many comments expressed concern about potential air quality impacts, particularly dust emissions and debris caused by construction. Many commenters were also concerned about the location of exhaust vents and potential air quality impacts during operation especially for children and the elderly in the Chinatown-International District. One comment mentioned structures should be designed for 100-year service with minimal and predetermined maintenance to limit carbon footprint and environmental impact.

Theme of Comment	Comments/Suggestions
Construction Impacts	Many comments expressed concern about construction impacts, particularly to residences and businesses. Major concerns were related to noise, air quality, lighting, transportation (autos, bicycles, transit, parking), pedestrian safety and access to businesses. The majority of construction impact concerns were raised about the Chinatown-International District neighborhood. One comment was received about construction impacts Downtown.
Economics	Some comments expressed concern about the potential economic impact of light rail operations on businesses and residents, as follows: Of the comments received about economic impacts, most expressed concern about potential economic impacts to businesses in the Chinatown-International District. Of the comments received about economic impacts, most raised concern about the potential for displacements. Of the comments received about economic impacts, most raised concern about the potential for increases to rents.
Environmental Justice	Many comments expressed concern about potential cultural, economic, environmental, social, and neighborhood impacts to minority and low-income communities and businesses in the Chinatown-International District. Some comments expressed desire to conduct a social and economic impact study of the station alternatives in the Chinatown-International District. In addition, the missed opportunity to improve transit access and reach underserved populations in the Chinatown-International District by locating the station south of the Chinatown-International District was also mentioned.
Historic Properties/Archaelogical Resources	Some comments expressed concern about potential impacts to historic properties and archaeological resources, mostly regarding the former U.S. immigration and detention center, which contains unprotected artifacts of Seattle immigration history, including the tar graffiti written by detainees on in the exercise yards.
Neighborhoods	Some comments were received about potential neighborhood impacts to the Chinatown-International District. Comments generally focused on station location impacting the neighborhood as well as the walkability and construction and operations causing noise and air quality impacts. Concerns were also raised about displacements of businesses and residents. A few comments were concerned about impacts to schools, cultural centers, and community facilities, and requested more study of community programs. Concerns about adverse impacts to the safety of neighborhoods and increased crime and homelessness were also raised. Comments were also received about the safety of alignment and station location, specifically in relation to children and elderly being able to easily access the station and network.
Noise and Vibration	Many comments referenced potential for noise and vibration impacts in residential areas during construction and operations. The majority of noise impact concerns were about the InScape Arts Building as well as the greater Chinatown-International District. A few comments were received about noise impacts to residences along the Queen Anne hillside.
Property Acquisition/Property Values/Indirect Displacement	Some comments were received expressing concern about property acquisition, with most of them concerned about potential acquisition in Ballard and the Chinatown-International District. Some comments were concerned about potential displacements as well as the preferred alternative International District/Chinatown station increasing the property value of the InScape Arts Building, with the costs being passed on to the tenants. Concerns were also raised over acquisition of affordable housing and the loss of
	housing during a housing shortage.

Theme of Comment		Comments/Suggestions
Transportation	Traffic	A few comments expressed concern about the traffic impacts to already congested roadways, particularly in the Chinatown-International District and 15th Avenue Northwest in Ballard. A few comments also expressed concerns about the impacts of rerouted/disrupted transit on local businesses and elderly transit users.
	Multi-modal Connections	Many comments expressed concerns that the preferred International District/Chinatown station is missing an opportunity to create a multi-modal regional transit hub. Many comments suggested that the project should facilitate efficient multi-modal connections/transfers at stations and expressed the importance of efficient transfers between the light rail lines, Amtrak, and other transit modes. A few comments also expressed an important consideration for station location was ease of access and proximity to cruise ships.
	Pedestrian	Some comments expressed concerns about long transfers for pedestrians in the Chinatown-International District. A comment requested a study of all the options and their impacts on the walkability of the Chinatown-International District neighborhood. A few comments expressed concerns about the location of the South Lake Union Station and how it would impact pedestrian access and experience.
	Ridership	Some comments expressed concerns about transfers between light rail stations for the preferred alternative in the Chinatown-International District and how they would impact ridership. A comment also wondered whether the ridership modeling had been updated to account for the decline in office employment.
	Station access/ADA Access and Mobility	Some comments were received emphasizing the importance of easy access to stations and a convenient and easily navigated pedestrian connection among King Street Station, the current Chinatown-International District station, and the new Link platforms. One comment mentioned the need for an Americans with Disability Act accessibility study to compare station alternatives.
	Transit	Some comments expressed concerns about transit reroutes and impacts during construction. A few comments noted the importance of not having to come to the surface to transfer between light rail lines.
		A comment expressed disappointment about the Ballard Link Extension schedule delays and mentioned public transit was really important to the whole community.
	Travel Times	A few comments were received requesting that light rail service travel times be quick and efficient and expressed concerns about the preferred alternative International District/Chinatown Station location impacts on travel times and reliability. Comments also recommended multi-modal connections be efficient so as to minimize overall commute travel times and increase ridership potential. A few comments requested information on how travel time impacts during, and after construction.
	Safety	A few comments were received expressing concerns about safety, particularly in relation to potential conflicts between cars and pedestrians/bikes near the Chinatown-International District station. A few comments raised concerns about safety around the station and in the neighborhood.
Visual Impacts		A few comments were received about the potential for visual impacts, primarily in Ballard. The concerns were in relation to elevated guideways impacting the visual character of the neighborhood.

5.3.6 Environmental Concerns

Table 5-6, Summary of Other Public Comments, summarizes other comments that do not fall into the categories discussed in Tables 5-2 through 5-5.

Table 5-6. Summary of Other Public Comments

Theme of Comment	Comments/Suggestions
Community Outreach	Many comments requested Sound Transit increase the Draft EIS comment period to 90 days to increase the level of public engagement/decision making. One comment also requested that Sound Transit plan for informing non-English speakers throughout the region when the Draft EIS is released and about how the alternatives could affect their travel.
Cumulative Considerations and Impacts	A few comments noted the general fatigue with construction disruption and displacements in CID and asked that cumulative construction impacts and environmental justice be evaluated.
Design	One comment asked whether there would be a requirement for corrosion control plan to achieve 100-year service life design. One comment requested center platforms for Downtown tunnel stations. One comment requested study of a deep bore tunnel Downtown to minimize surface impacts during construction.
Future Extension	Some comments expressed the need to consider future extension when designing the project and choosing the preferred alignment, including the ability to develop future transit hubs, connectivity and increased capacity.
Operations/Schedule	Some comments expressed the need to have reliable and frequent operations.
	A few comments suggested that alternative technology, especially automated options that could allow higher frequency and smaller stations, be used.
	One comment asked about operating just to Interbay if the portion between Interbay and Ballard needed to be delayed.
Project Cost and Funding	Some comments expressed concerns the Sound Transit Board of Directors was sacrificing long-term network connectivity for short-term cost savings and mentioned reliability and efficiency should be prioritized even if more expensive. A few comments mentioned that the Ballard Link Extension makes more social and economic sense to push forward now compared to West Seattle Link Extension and funds should be allocated to the Ballard Link Extension.
Project Schedule	Some comments expressed the need to complete the project as soon as possible and expressed concerns about further delays.
Public Art/Passenger Experience	One comment requested to include artwork from the artists impacted by the project in the new construction as public art acquisition or activation.
Purpose and Needs	A few comments mentioned the impact on work from home on ridership and overcrowding. In addition, a comment mentioned the project purpose and need should emphasize the need for easy connectivity between lines and among modes and that the user experience should be paramount in the project design.
Station Location and Amenities	One comment asked whether there would be opportunities for conversation or a process around a community benefits agreement to reimagine the South Dearborn Street area with equitable transit-oriented development, public restrooms, lighting and greenspace.
Support Project	Some comments expressed their support to the project.
Urban Design and Transit- oriented Development	Some comments mentioned community-oriented transit development could harm the historic Chinatown-International District community while a few others wondered about the opportunities for community-oriented developments.

5.4 Businesses and Business Organizations

Table 5-7, Summary of Business and Business Organization Comments, summarizes the comments submitted on behalf of community organizations during scoping. Copies of these submittals are available in Appendix C, Business and Business Organization Comments.

Table 5-7. Summary of Business and Business Organization Comments

Business/Business Organization	Comments
Downtown Seattle Stakeholders (includes Amazon, Clise Properties, Commute Seattle, Inspire Washington, Seattle Center Foundation, Seattle Kraken, SODO BIA, Starbucks, University of Washington, and Jane Lewis, a Downtown resident)	Downtown Seattle Stakeholders, a coalition led by the Seattle Metropolitan Chamber of Commerce and the Downtown Seattle Association, submitted comments in support of the project but expressed concern about the level and duration of concurrent construction needed in Downtown for six stations and a tunnel, especially when combined with other projects that will be under construction at the same time. They noted that Downtown Seattle is the region's hub for jobs, arts, sports, and tourism, and is a significant source of tax revenue for multiple levels of government. They requested the Draft EIS disclose all new and additional information available about the preferred alternative and include more detail on impacts and mitigation measures. They consider impacts from 10 or more years of construction to be permanent impacts rather than temporary, and a wide range of resources will be affected during this time. They requested more detailed analysis of economic impacts to Downtown during construction, how surplus property will be disposed of and opportunities for joint development, noise and vibration impacts and mitigation, utility relocation impacts, changes in access to social and health services, a community impacts assessment for the Chinatown-International District, and information on disruption to existing light rail service during construction. They requested that traffic analysis consider return to work policies planned for 2025, other measures of effectiveness than level of service, identification of staging and haul routes, both event and non-event conditions, impacts to transit service, and impacts to on- and off-street parking and wayfinding. They provided specific suggestions for construction analysis at each station, including specific projects that should be considered for cumulative impacts. They suggested leasing property for staging rather than acquiring property so that the owner can redevelop it more quickly after construction ends. They requested the Draft EIS include strategies to avoid, minimize,
	for other large projects in recent years, including for Climate Pledge Arena, projects along the waterfront and the Alaskan Way Viaduct Replacement project, and the Convention Center expansion.
Essex Queen Anne LLC	Essex Queen Anne LLC submitted comments noting their support for the preferred alternative, particularly the Seattle Center station, which would no longer be adjacent to their building. They requested that statements about preserving housing and businesses be added to the project purpose and need and to only study alternatives that would not locate the Seattle Center station directly next to the Seattle Center. They requested more detailed construction analysis and that the design used for the Draft EIS be further advanced compared to the design used for the WSBLE Draft EIS.
	They also requested greater study of economic impacts, construction impacts, land use impacts, and clarity about whether the Draft EIS is a project-level or programmatic-level document under the SEPA.

Business/Business Organization	Comments
International Community Health Services (ICHS)	International Community Health Services submitted comments supporting the project and requesting consideration of "the following three broad areas in their environmental analysis of the [Ballard Link Extension] BLE project:
	Use the positive aspects of 4th Avenue S[outh] station location to inform the analysis of potential alternatives, regardless of the final selection;
	2. Do not consider 5th Avenue S[outh] as a station option; and
	3. More study of connectivity opportunities between Dearborn St[reet] station and the existing CID station."
	They noted widespread support for a station on 4th Avenue South by the Chinatown-International District and Pioneer Square neighborhoods, and that community concerns regarding the 5th Avenue Diagonal Alternative still remain. They noted the impact that COVID-19 and anti-Asian violence have had and continue to have on the community, and urged Sound Transit not to move forward with the 5th Avenue alternatives or use it as a baseline for cost comparison. They expressed concerns about the preferred location for the International District/Chinatown Station, including accessibility and connectivity. They suggested an underground pedestrian tunnel between this proposed station and the existing station, and requested that Sound Transit study ways to improve connectivity between the stations. They recommended that Sound Transit develop a comprehensive plan for how it and other agencies will make permitting decisions and incorporate community involvement in that process. They also requested noise and vibration analysis for all alternatives being studied in the Chinatown-International District. They requested an extended comment period on the Draft EIS to allow for sufficient time
	for review of the new preferred alternative.
Keller Supply Company	Keller Supply Company submitted comments opposing the preferred alternative for the Interbay Station, which would displace them. Their location includes a warehouse, outdoor storage, and their corporate national headquarters. They encourage Sound Transit to select another alternative that would not displace them, due to the difficulty they would have relocating in the area due to their space requirement and need for large semi-trucks to access their site.
Nordstrom	Nordstrom submitted comments in support of the project but expressing concern regarding the impacts of construction road closures near their two stores for construction of the Westlake Station under Alternatives DT-1 and DT-2. They noted that these closures would make economic recovery of the Downtown Seattle core more difficult because they would make it more difficult for people to get to and around this area. They are concerned about having to potentially close their stores if sales decline during construction, and also having to relocate their corporate campus either temporarily or permanently.
SODO Business	The SODO Business Improvement Area submitted comments regarding the following:
Improvement Area	 Impacts to all modes of transportation and general transportation circulation during construction, and the potential for cumulative impacts during construction of multiple projects in SODO as well as the effect of recent zoning changes. They requested to be involved in interagency coordination regarding impacts to the SODO neighborhood. Multi-modal connections to the SODO Station between 1st Avenue South and Airport Way South. Pedestrian access and safety at the Stadium and International District/Chinatown stations. They requested more detail about station access and stated all bus and pick-up/drop-off facilities should be outside of public right-of-way. Effects of transfers between stations on West Seattle Link Extension stations and other stations, and enhancement of stations to accommodate transfers. Hide-and-ride parking impacts near stations. They requested that the closure of the SODO Busway be identified as an impact to SODO district businesses and King County Metro.

Business/Business Organization	Comments
Vulcan	Vulcan submitted comments expressing support for the project but concern about simultaneous construction of multiple stations in the project corridor and noted questions about construction plans and impacts in the South Lake Union neighborhood, particularly around the Denny Station. They requested more analysis of utility relocation needs and impacts, construction logistics, direct and indirect impacts to properties, construction truck traffic, economic impacts to businesses during and after construction, and more detail on mitigation.

5.5 Community Organizations

Table 5-8, Summary of Community Organization Comments, summarizes the comments submitted on behalf of community organizations during scoping. Copies of these letters are available in Appendix D, Community Organization Comments.

Table 5-8. Summary of Community Organization Comments

Community	
Organization	Comments
Alliance for Pioneer Square	The Alliance for Pioneer Square requested that Pioneer Square be included in the study area, that the entire district be identified as a service area, and that the EIS study impacts to Pioneer Square for all resources. Detailed comments and suggestions were provided regarding the transportation, parking, construction, social, and environmental justice impact analyses and mitigation.
	They noted the neighborhood has a number of workers that come from South King County and they would like the differences in access to the neighborhood from the south identified as well as differences in access to/from Sea-Tac Airport. They noted the high percentage of minority, low-income, and homeless populations in this neighborhood and the need to maintain access to the services in this area that support them.
	They requested that design concepts resulting from the South Downtown Hub planning work they have participated in be reflected in the design and alternatives studied in the EIS. They also requested the EIS evaluate the ability of each alternative to help realize the goals of the plan. They also commented on the need for design of the project in the Pioneer Square area being consistent with the scale and character of the neighborhood.
	They also noted that as part of a settlement agreement with the Washington State Department of Transportation, King County, and the City of Seattle for the Alaskan Way Promenade and Overlook Walk, these agencies agreed to reduce lanes on Alaskan Way South within 15 months of the opening of the Alaska Junction Station for the West Seattle Link Extension.
	They requested to be a consulting party in the Section 106 process and to be involved in design development in their historic district. They also requested a minimum 90-day comment period on the Draft EIS as well as translated materials and resources for language access be provided at the beginning of the comment period.
GREAT for All Coalition	The GREAT for All Coalition submitted comments supporting the preferred alternative for the International District/Chinatown and Midtown stations. They requested study of traffic and pedestrian impacts, air quality, noise, relocations, neighborhood impacts, small business impacts during construction. They also requested consideration of green space, shade, and water features in the project design.

Community Organization	Comments
InterIm CDA	InterIm CDA submitted comments supporting the preferred alternative for the International District/Chinatown and Midtown stations, and stated that study of the 5th Avenue Diagonal alternative in the Chinatown-International District/SODO Segment should be discontinued. They provided a number of considerations regarding the neighborhood, including limiting disruption to residents' and business's day-to-day lives, preservation of the community's identity, minimizing and mitigating long-term impacts, and ability to divert stadium traffic away from the neighborhood. They expressed concern about noise and air pollution, the ability of the community to enjoy outdoor spaces and walk in the neighborhood during construction, changes in existing transit service, indirect displacement of small businesses, and diversion of traffic into the neighborhood. They also noted the potential for the neighborhood to grow with the preferred alternative station location, including opportunities for low-income housing, green space, small businesses, and community land ownership.
Historic Seattle	Historic Seattle submitted comments stating they feel the preferred alternative in the Chinatown-International District and Downtown will still have adverse effects on cultural and historic resources. They do not support the 5th Avenue Diagonal alternative or the International District/Chinatown and Midtown station locations associated with the preferred alternative. They expressed concerns about impacts from the preferred alternative to the historic INS building and its artist community from construction of the International District/Chinatown station and the demolition of the King County Administration Building for the Midtown Station. They continue to support the 4th Avenue Shallow or the 4th Avenue Shallower alternatives as they feel these would be less impactful to the community.
Historic South Downtown	Historic South Downtown submitted comments noting they agree with the project purpose and need and support equitable access to Pioneer Square and Chinatown-International District. They requested the Draft EIS reflect board input on the feasibility of Chinatown-International District alternatives studied in the WSBLE Draft EIS. They noted that if Alternative CID-2a is considered infeasible, it should not be used as a baseline for comparing costs. They asked that additional studies completed for Alternative CID-1a be reflected in the Draft EIS, and to clarify the Seattle Department of Transportation's position on whether the 4th Avenue South viaduct needs to be replaced.
	They requested consideration of the West Seattle Link Extension and other projects in cumulative construction impacts, and also the cumulative impacts of the project along with the King County Civic Campus plan on the neighborhoods around the preferred Midtown Station. They requested analysis of zoning changes needed for equitable transit-oriented development for the preferred International District/Chinatown Station. They expressed concern about air quality and noise impacts from haul routes, impacts to the InScape Arts Building, indirect displacement, public safety, and quality of life and health impacts. They also requested study of the effects of stadium events during both construction and operations. They noted the Section 106 Area of Potential Effect will need to be updated.
	They requested that design concepts resulting from the South Downtown Hub planning work be reflected in the EIS, and noted the need for pedestrian improvements around the preferred International District/Chinatown and Midtown station locations would be greater than for other alternatives. They suggested the Urban Design Framework used at the Capitol Hill Station be a model for managing community input for and mitigating station and transit-oriented development impacts.
	They also requested a minimum 90-day comment period on the Draft EIS as well as translated materials and resources for language access be provided at the beginning of the comment period.

Community Organization	Comments
Puget Sound Sage	Puget Sound Sage submitted comments requesting more study of both construction and operational impacts to the Chinatown-International District, including noise and vibration, air quality, business displacements, economic impacts, environmental justice, and cumulative impacts. They requested more information on transportation modes used by this community and who would be using the station in this neighborhood, more information on impacts to pedestrian facilities and construction vehicle volumes. They expressed concern regarding the closure of South King Street during construction with the 5th Avenue Diagonal alternative, and that it would result in fewer people visiting the Chinatown-International District. They requested more analysis of cumulative construction projects occurring in the neighborhood, and information on how much additional construction time would be needed for transit-oriented development projects associated with the stations for the preferred alternative or 5th Avenue alternatives. They would like analysis of how changes in transit service with the project would affect transit-dependent residents of the neighborhood. They requested a more thorough comparison of transit-oriented development between alternatives, including information on land available for transit-oriented development after construction, the number of affordable housing units that could be built, opportunities for joint development, and potential for new park or recreational resources.
Seattle Center Foundation and KEXP, Seattle Repertory Theatre, The Vera Project, Cornish College of the Arts, Classical KING FM 98.1, MoPOP, Seattle Children's Theatre, PNW Ballet, and Seattle Opera	The Seattle Center Foundation and multiple resident organizations submitted comments noting appreciation for shifting the preferred location of Seattle Center to the west and requesting analysis of construction transportation direct and cumulative impacts, for both event and non-event times. Specific concerns were road closures, parking, and haul routes. They requested analysis of noise and vibration impacts to facilities on their campus both during construction and operation, impacts from utility relocations, and economic impacts from construction activities in the surrounding neighborhood. They noted concern about cumulative impacts from multiple construction projects occurring at the same time.
Seattle Chinatown International District Preservation and Development Authority (SCIDpda)	SCIDpda submitted comments noting the preferred alternative in the Chinatown-International District/SODO Segment was a response to concerns raised by the community during the WSBLE Draft EIS process, and requesting that Sound Transit continue to center and elevate community voices as well as provide access to new decision makers and executives.
	They noted findings of a community survey conducted in the summer of 2024 that identified four important concepts related to light rail expansion, including the following:
	 "CID and Pioneer Square residents are deeply invested long-term partners committed to the vitality, connectedness and accessibility of our neighborhoods. Residents appear to be willing to shoulder some inconvenience and short-term disruption of construction to reap the benefits of a well-connected transit system that best serves the neighborhood. When given a choice between the preferred alternative and the 4th Avenue/Midtown alternative, residents prefer 4th Avenue by an exceedingly wide margin. Residents and workers acknowledge that the preferred alternative will bring the possibility of development opportunities and activity to an un-activated part of the city." They requested that these concepts be integrated into the preferred alternative, and to
Osseth Laboration	plan for substantial, innovative, and early mitigation.
South Lake Union Community Council	The South Lake Union Community Council submitted comments in support of the comments submitted by the Downtown Seattle Association (as part of the "Downtown Stakeholders"). They also asked that transit-oriented development be considered early in the planning process for the South Lake Union Station, particularly low-income and workforce housing. They noted they have advocated for this at the site of the preferred alternative South Lake Union Station since 2010.

Community Organization	Comments
Uptown Alliance	The Uptown Alliance submitted comments supporting the project but noting they felt that previous information in the WSBLE Draft EIS and outreach provided was not detailed enough. They requested analysis for the following topics in the Draft EIS: transportation impacts during construction, including during Seattle Center events and concurrent construction for the Seattle Center and South Lake Union stations, economics impacts to small businesses, noise and vibration, disposition of surplus properties and transit-oriented development opportunities, impacts to adjacent property owners, pedestrian improvements needed around stations, how excavated soil would be transported out of the neighborhood, the impacts from this hauling, and how the hillside at the tunnel portal would be stabilized. They requested more detail regarding property acquisition and expressed concern about impacts to the Mediterranean Inn and SIFF Cinema Uptown.
	They requested coordination with design of the Elliott West Wet Weather Station and illustrations of the projects together. They requested more thorough outreach to the Uptown neighborhood regarding the extent of the project and construction in their neighborhood. They also requested that information be shared in a more detailed a more legible way, such as 3-D visualizations.

6 Next Steps

6.1 Identifying the Ballard Link Extension Draft EIS Alternatives and the Scope of the EIS

The public and agency comments received during scoping will help FTA and Sound Transit finalize the Purpose and Need for the project and identify the issues and alternatives to be considered in the EIS. Following scoping, the Sound Transit Board may identify other alternatives or modifications to be studied in the EIS.

6.2 Ballard Link Extension Draft EIS

As detailed in Section 1, Introduction, this Draft EIS will build on the environmental analysis already completed for the project as part of the WSBLE Draft EIS. This new Ballard Link Extension Draft EIS will describe the potential benefits and adverse effects of each alternative and will outline potential ways to avoid, minimize, or mitigate negative effects. FTA and Sound Transit are planning to issue the Draft EIS for public and agency review in 2025. The EIS will be available for a public comment period that will include public hearings. After the close of the Draft EIS public comment period, the Sound Transit Board will consider public comments as well as the information in the Draft EIS and then confirm or modify the preferred alternative to be evaluated in the Final EIS along with other alternatives.

6.3 Ballard Link Extension Final EIS

The Final EIS will respond to comments received on the Ballard Link Extension Draft EIS, as well as comments received on the WSBLE Draft EIS relevant to the Ballard Link Extension. The Final EIS will also outline potential mitigation commitments for environmental impacts. Work on the Final EIS is expected to begin in 2025 with publication scheduled in 2026.

6.4 Record of Decision

After the publication and review of the Final EIS, the Sound Transit Board will select the project to build. FTA will then issue a Record of Decision. The Record of Decision will document the project that Sound Transit will build and how it will avoid, minimize, and mitigate environmental impacts.

7 References

Peters, David A. 2024. "<u>Ballard Link Extension CID Station Alternatives</u>." Presentation by Independent Consultant to the Sound Transit Board of Directors. November 14. https://www.soundtransit.org/st_sharepoint/download/sites/PRDA/FinalRecords/2024/Presentation%20-%20BLE%20CID%20Independent%20Consultant%20Report%2011-14-24.pdf.

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