



APPENDIX D

Government Entity Comments

Communication ID: 351123

From: US Coast Guard (USCG) District 13

Scoping Comment:

Dear Sound Transit EIS Team

By letter to Ms. Linda Gehrke of Sound Transit dated March 8, 2019, the U.S. Coast Guard District 13 Bridge Office agreed to be a "cooperating agency" for Sound Transit's EIS for the proposed West Seattle and Ballard Link Extension Project. We are pleased to serve in this role and provide the following scoping comments for your use in scoping for the NEPA EIS for this project.

1. The U.S. Coast Guard (USCG) has a Congressionally mandated responsibility to preserve the public right of navigation and to prevent interference with interstate and foreign commerce on navigable waters. Therefore, the EIS for this project needs to thoroughly address potential impacts to navigation that might result from any project alternatives analyzed. The USCG's obligation is to ensure the final permitted design does not impinge upon the "reasonable needs of navigation" for affected waterways, while also serving the needs of land transportation.
2. More specifically, the USCG's NEPA area of responsibility is any navigable water body affected, as well as the bridge and its approaches and logical termini. This project area falls within the jurisdiction of the USCG District 13 Bridge Office in Seattle, Washington.
3. This project is envisioned to cross two major waterways: the Duwamish Waterway, and Lake Union Ship Canal at Salmon Bay. Both of these waterways are navigable waters of the United States, and therefore, any bridge over them is subject to permitting by the USCG.
4. The application for a USCG bridge permit is titled the "Bridge Permit Application Guide" (BPAG) and can be found at:[https://nam03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.dco.uscg.mil%2FPortals%2F9%2FD%2FDocuments%2F5pw%2FOffice%2520of%2520Bridge%2520Programs%2FBPAG%2520COMDTPUB%2520P16591%25203D_Sequential%2520Clearance%2520Final\(July2016\).pdf&data=01%7C01%7Cwsbscopingcomments%40soundtransit.org%7C854f74930d8c4a615f8108d6b7aa1ad3%7Cca24b0afd8fb4e629ead8b37062261d0%7C1&sdata=A8mXKdy1jl%2BMYbHYmLPVTzyj0MPp9LPt7OsyG%2BjCnM4%3D&reserved=0](https://nam03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.dco.uscg.mil%2FPortals%2F9%2FD%2FDocuments%2F5pw%2FOffice%2520of%2520Bridge%2520Programs%2FBPAG%2520COMDTPUB%2520P16591%25203D_Sequential%2520Clearance%2520Final(July2016).pdf&data=01%7C01%7Cwsbscopingcomments%40soundtransit.org%7C854f74930d8c4a615f8108d6b7aa1ad3%7Cca24b0afd8fb4e629ead8b37062261d0%7C1&sdata=A8mXKdy1jl%2BMYbHYmLPVTzyj0MPp9LPt7OsyG%2BjCnM4%3D&reserved=0)
5. Although not included as part of the EIS for this project, a Navigation Impact Report (NIR) will be essential to inform your process of selection and analysis of project alternatives. The contents of a NIR can be found in the BPAG at the same link provided above.
6. In its role as a cooperating federal agency, the USCG will observe the Presidential "One Federal Decision" directive for the USCG's coordination with the FTA, as the federal Lead Agency for this project.

Thank you for the opportunity to provide these scoping comments for this project. The USCG District 13 Bridge Office looks forward to coordinating with Sound Transit on this project as a Cooperating Agency.

Very Respectfully,

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ENVIRONMENTAL REVIEW
AND ASSESSMENT

April 2, 2019

Mr. Mark Assam
Federal Transit Administration, Region 10
915 Second Avenue, Suite 3142
Seattle, Washington 98174

Ms. Lauren Swift
Central Corridor Environmental Manager
Sound Transit
401 S. Jackson Street
Seattle, Washington 98104-2826

Dear Mr. Assam and Ms. Swift:

The U.S. Environmental Protection Agency has reviewed the Federal Transit Administration's February 12, 2019 Notice of Intent initiating the scoping process for the FTA and Sound Transit West Seattle and Ballard Link Extensions, a light rail transit extension project (EPA Region 10 project number 19-0002-FTA). The EPA comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations 40 CFR Sections 1500-1508, and Section 309 of the Clean Air Act.

The West Seattle and Ballard Link Extensions are part of the voter-approved regional transit system plan, Sound Transit 3. The project would provide light rail transit between and through the West Seattle, Downtown, and Ballard neighborhoods in Seattle, King County, Washington. Each light rail transit alternative is approximately 11.8 miles long and includes 14 stations. The proposed alignments and stations include elevated, at-grade, and tunnel configurations. The 4.7-mile West Seattle segment would cross the Duwamish River on a high-level fixed rail-only bridge parallel to the existing West Seattle Bridge on either the north or south sides and connect to the existing downtown Seattle transit tunnel. A new downtown rail-only tunnel would begin near the Stadium station. The 7.1-mile Ballard segment would run from downtown in the tunnel to the Seattle Center, transition to at-grade or elevated configurations, and cross Salmon Bay with a new rail-only moveable bridge, a high-level fixed bridge, or tunnel.

FTA and Sound Transit identify the following subjects as likely areas of investigation for possible adverse effects:¹

- Transportation – traffic, freight, navigation, transit, non-motorized;
- Land use and consistency with applicable plans;
- Property acquisitions, displacements, and relocations;
- Social and economic impacts;
- Park and recreation resources;
- Historic, cultural, and archaeological resources;

¹ These subjects were identified either in the Federal Register NOI or on the project website.

- Environmental justice;
- Electromagnetic fields;
- Public services, safety and security;
- Geology and soils;
- Hazardous materials;
- Utilities;
- Water resources;
- Visual and aesthetic qualities;
- Air quality;
- Noise and vibration;
- Energy use;
- Safety and security;
- Community facilities and neighborhoods;
- Ecosystems, including threatened and endangered species and marine mammals;
- Section 4(f) and Section 6(f) resources;
- Short-term construction and long-term operational impacts;
- Indirect, secondary, and cumulative impacts; and
- Proposed measures to avoid, minimize, or mitigate significant adverse impacts.

We agree that these issues should be addressed in the NEPA analysis. For your consideration, we offer the enclosed detailed scoping comments to provide more information regarding the above topics, and we recommend a few additional subjects for evaluation. We also include information to assist interagency coordination with respect to contaminated sites within the Duwamish Valley and Salmon Bay, which may be affected by the proposed light rail projects.

We appreciate the opportunity to offer comment at the scoping stage for the West Seattle and Ballard Link Extensions. If you have questions or need more information, please contact me at 206-553-2966 or at somers.elaine@epa.gov.

Sincerely,



Elaine L. Somers
Environmental Review and Sediment Management Unit

Enclosure: U.S. EPA detailed scoping comments for the West Seattle and Ballard Link Extensions

**U.S. Environmental Protection Agency
Detailed Scoping Comments for the
West Seattle and Ballard Link Extensions**

Range of alternatives

We recommend that the EIS include a reasonable range of alternatives that meet the stated purpose and need, goals and objectives, and that respond to issues identified during the scoping process. The alternatives analysis would then compare alternatives with respect to how well they respond to the stated purpose and need, goals and objectives, and scoping issues. The Council on Environmental Quality (CEQ) recommends that all reasonable alternatives be considered, even if some of them could be outside the capability of the applicant or the jurisdiction of the agency preparing the EIS. Consistent with the purpose of the NEPA,² the EPA encourages selection of alternatives that protect, restore, and enhance the environment. We support lead agencies' efforts to identify and select alternatives that maximize environmental benefits and that avoid and minimize impacts and mitigate any remaining unavoidable environmental impacts.

Scope of effects analysis

The NEPA and its implementing regulations call for analysis of effects in a broad sense, addressing important issues that arise during scoping. Impacts from a project may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect would be beneficial. There can be situations when adverse impacts occur even though regulations are met. For example, several air toxics are not regulated but are known to create a health risk. To comply with NEPA, the environmental analysis would need to evaluate and disclose the impacts from all emissions, regardless of whether there is a regulation that manages those emissions. Therefore, we recommend that it is important to consider and evaluate all of the impacts from the project, including those that may not be managed through existing regulations. The "Potential violation of Federal, State, or local law or requirements imposed for the protection of the environment" is one of ten factors that should be considered in evaluating severity of impact (See 40 CFR 1508.27(b) for more information)."

Hazardous materials, contaminated sites

Duwamish Valley: In the Duwamish Valley, there are many activities associated with contaminated sites that may be affected by the West Seattle Extension. The online project maps³ show elevated rail alignments that cross Harbor Island and end in West Seattle. The past and ongoing industrial uses of the Duwamish Valley warrant careful attention to past and ongoing environmental cleanups, pollution source control, and restoration work. To the extent that siting and construction for elevated, at-grade, or tunnel alignments may affect completed, ongoing, or planned cleanup, coordination with the EPA and Washington State Department of Ecology Cleanup and Brownfields programs, Ecology and EPA Clean Water Act programs, and regulated government entities responsible for aspects of source control work, will be essential.

Depending on the final alignment, the proposed work may impact one or more of the following sites:

Harbor Island is a federal Superfund site that includes the island itself and adjacent sediments. The Department of Ecology oversees upland elements of the Harbor Island site. The East Waterway and West Waterway portions of the site involve the EPA Superfund program's sediment cleanup. Some of the sediment cleanup was done early on (Lockheed Shipyard), while other elements are nearing a

² 40 CFR 1500.1

³ www.soundtransit.org/WSBLink

cleanup decision (East Waterway) or awaiting review and confirmation of a no-further-action decision (West Waterway).

Lockheed West Seattle is a separate Superfund site outside the mouth of the Duwamish West Waterway. Sediment cleanup is ongoing – dredging of contaminated sediments started in 2018 and will resume during the 2019 fish window. Cleanup should be completed by the end of the fish window of winter 2019/2020.

Pacific Sound Resources (PSR) is a former wood treating site on the Elliott Bay shore west of Lockheed West Seattle. Port Terminal 5/Jack Black Park includes the upland part of the site. The contaminated sediments were addressed with a cap. The PSR site has a completed sediment remedy and is reviewed by EPA every five years.

Lower Duwamish Waterway Superfund Site extends from the south tip of Harbor Island southward, with the waterway sediment portion extending south for five miles. An early sediment cleanup took place near Harbor Island (at the Duwamish/Diagonal Combined Sewer Overflow outfall). Ecology is overseeing source control in areas with outfalls or other water pathways to the Duwamish. Their role in source control includes their Clean Water Act program effort (permits, inspections, compliance assistance, enforcement, etc.) and studies and cleanups at Model Toxics Control Act and Hazardous Waste Program sites on and near the waterway. The EPA has RCRA, CERCLA and TSCA studies and cleanup actions in the area as well.

Salmon Bay: Salmon Bay is a highly urbanized waterway with a history of industries related to marine commercial and recreational enterprises including marinas, boat repair yards, marine terminals, and shipyards. There is also a history of combined sewer overflow discharges. These varied activities/inputs have resulted in a patchwork of sediment contamination that must be considered and characterized for any in-water and/or shoreline construction alternatives.

We recommend that the NEPA document identify the potential impacts from bridge construction, operation, and maintenance to Salmon Bay hydrology, water quality, sediments, and biota. Because the site characterization should include sampling information that is commensurate with the depth and extent of disturbance from construction, the EIS should identify where, how, and to what depth new bridge footings would be built. Existing sediment remediation activities will need to be identified and protected, especially any caps placed to isolate contamination in-situ. It will also be important to determine whether groundwater aquifers are present that could potentially be affected by bridge construction or other activities and discuss impacts to groundwater resources. Finally, construction best management practices to protect surface water, ground water, sediment quality and associated resources must be identified for any alternatives.

EPA contacts

Waterways:

- Elly Hale, Lower Duwamish Waterway remedial project manager (RPM) for sediment cleanup
206-553-1215, hale.elly@epa.gov
- Ravi Sanga, East Waterway (Harbor Island site) RPM and contact for PSR
206-553-4092, sanga.ravi@epa.gov
- Piper Peterson, Lockheed West Seattle RPM
206-553-4951, peterson.piper@epa.gov
- Shawn Blocker, Manager for Unit 3, which includes all three sites and RPMs

206-553-4166, blocker.shawn@epa.gov

- Robert Grandinetti, EPA NPDES/CSO Compliance and Enforcement; oversees King County CSO control efforts under a federal Consent Decree. 509-376-3748, grandinetti.robert@epa.gov

Upland sites:⁴

- Dave Bartus, Boeing Plant 2 RCRA site
206-553-2804, bartus.dave@epa.gov
- Janette Knittel, former Rhone Poulenc RCRA site
206-553-0483, knittel.janette@epa.gov
- Laura Castrilli, Boeing EMF CERCLA removal action
206-553-4323, castrilli.laura@epa.gov
- Michelle Mullin, Rainier Commons (former Tully's/Rainier Brewery TSCA PCB abatement)
206-553-1616, mullin.michelle@epa.gov
- Bradley Martin, RPM for Earle M. Jorgensen removal action
206-553-4029, martin.bradley@epa.gov

Washington State Department of Ecology:

- Rachel McCrea, Water Quality Section Manager, Northwest Regional Office
NPDES and stormwater-related topics; 425-649-7033; rmcc461@ecy.wa.gov
- Tamara Cardona, PhD, Aquatics Unit Supervisor, Northwest Regional Office
Toxics Cleanup Program, MTCA sites, other Ecology corrective actions; 425-649-7058;
taca461@ecy.wa.gov
- Rick Thomas, Project Lead, Lower Duwamish Source Control, Northwest Regional Office
3190 160th Ave. SE, Bellevue, WA 98008; 425-649-7208; rith461@ecy.wa.gov

NOAA:

Rebecca Hoff, Lead Administrative Trustee on the Natural Resources Trustee Council
206-526-6276, rebecca.hoff@noaa.gov

Aquatic resources

The NEPA analysis should address all potentially affected aquatic resources, including surface water and ground water, water quality and quantity, hydrology, and sensitive aquatic areas, such as wetlands, streams, floodplains, shorelines, riparian areas, ground water recharge areas, hyporheic zones, drinking water sources and supplies.

We recommend that the NEPA document describe aquatic habitats in terms of habitat type, plant and animal species, functional values, and integrity. Evaluate impacts in terms of the aerial (acreage) or linear extent to be impacted and by the functions they perform. The effects assessment should address changes in the extent of impervious surface, stormwater runoff (including any leaching of chemical substances from the guideway rails/elevated structure or light rail trains into waterbodies), treatment and management, including use of Low Impact Development strategies, effects to waters listed as impaired under Clean Water Act 303(d), and compliance with other Clean Water Act requirements and implementing regulations, such as those for Total Maximum Daily Loads, and anti-degradation. For construction activities that would disturb more than one acre of land (40 CFR 122.26(b)), a National Pollutant Discharge Elimination System stormwater discharge permit is required.

⁴ The known EPA upland sites may not have significant nexus to the proposed project, as most are south of Harbor Island.

Project proponents should plan, design, construct and maintain the project to avoid or have minimal long-term water quality and aquatic resources impacts. For any impacts that cannot be avoided through siting and design, the NEPA document should include protection measures and describe the types, location, and estimated effectiveness of best management practices applied to minimize and mitigate impacts to aquatic resources.

The proposed activities may require a Clean Water Act Section 404 permit from the Army Corps of Engineers. For wetlands and other special aquatic sites, the Section 404(b)(1) Guidelines, found at 40 CFR 230 establish a presumption that upland alternatives are available for non-water dependent activities. The 404(b)(1) Guidelines require that impacts to aquatic resources be (1) avoided, (2) minimized, and (3) mitigated, in that sequence. The NEPA document should discuss in detail how planning efforts (and alternative selection) conform to Section 404(b)(1) Guidelines sequencing and criteria. In other words, the project proponent must show that they have avoided impacts to wetlands and other special aquatic sites to the maximum extent practicable. The NEPA document should discuss alternatives that would avoid wetlands and aquatic resource impacts from fill placement, water impoundment, construction, and other activities before proceeding to minimization and other mitigation measures.

We recommend that the project plan and design avoid and minimize encroachment upon, or disturbance to, natural stream hydrology, stream migration zones, stream banks and channels, riparian areas, wetlands, and floodplains. It is important to maintain and preserve natural stream geomorphology and hydrology and restore and preserve the natural and beneficial effects of riparian areas and floodplains.

For Clean Water Act 303(d) listed water bodies in the project area, the NEPA document should also disclose information regarding Total Maximum Daily Loads, the water bodies to which they apply, and pollutants of concern. The proposed project should not further degrade 303(d) listed waters and should be consistent with Total Maximum Daily Loads to restore beneficial use support for impaired waters. If additional pollutant loading is predicted to occur to a 303(d) listed stream due to the proposed project, the project should include measures to control existing sources of pollution to offset pollutant additions, such as from road or station construction, so that no deterioration of water quality occurs.

Air toxics, construction emissions mitigation

The EIS should disclose whether air toxics emissions would result from project construction and operations, discuss the cancer and non-cancer health effects associated with air toxics and diesel particulate matter, and identify sensitive receptor populations and individuals who are likely to be exposed to these emissions.

Air toxics and diesel emissions, which are emitted from mobile sources, construction vehicles and equipment, are known or suspected to cause cancer or other serious health effects, such as respiratory, neurological, reproductive, and developmental effects. The proposed project should include measures to substantially reduce emissions of and exposure to these air pollutants for construction workers and nearby residents and businesses. We recommend including and committing to implement a full suite of construction mitigation measures, such as those from the Clean Construction USA Web site at <https://www.epa.gov/cleandiesel/construction-and-agriculture#construction>. Measures such as diesel engine retrofit technology in off-road equipment would greatly help to reduce air toxics and diesel particulate emissions. Such technology may include diesel oxidation catalyst/diesel particulate filters, engine upgrades, engine replacements, newer model year equipment, use of biodiesel, or combinations

of these strategies. For more information about air toxics, please contact Karl Pepple, EPA Air Program, at (206) 553-1778.

The South Park and Georgetown neighborhoods have expressed interest to EPA Region 10 in learning more about the NEPA and the Washington SEPA processes. These neighborhoods have been working together to address emissions that their communities experience. While they will benefit from any emissions reductions resulting from the future transit line, the project construction emissions would be considered as an added burden to what they already experience. As the project moves forward, we recommend that FTA and Sound Transit hold community meetings to address the concerns of these and all affected neighborhoods, and that their concerns be addressed in the NEPA analysis.

Recommendations for route selection and project design

Protect and enhance natural areas and corridors. Although it is densely urbanized, the project area includes various parks, green spaces, greenbelt corridors, and habitat restoration projects--many constructed by the Port of Seattle on Port property, and some by independent parties (Bluewater), which are closely tracked by the Natural Resource Trustee Council. These are important open space and recreational features that provide ecological benefits and contribute to human health and wellbeing.⁵ We recommend that these features be identified, that FTA and Sound Transit avoid and minimize impacts to them, and that they be enhanced and connected wherever practicable. We also suggest contacting and coordinating with the Seattle Parks Greenway program regarding their inventory and plans for Seattle greenways, as there may be opportunities to protect, restore, or enhance the continuity of corridors and other upland and aquatic areas. Information regarding existing corridors, gaps that could be restored, and how the Build Alternative options would potentially affect those areas, would be helpful to inform the analysis of routing options, project design, and mitigation opportunities.

Maximize the use of existing infrastructure. We recommend maximizing the use of existing transportation corridors and rights-of-way to the extent practicable, retrofitting them as needed to make them serviceable and more environmentally functional, and minimizing the creation of new corridors that may infringe upon remaining open space. Where property acquisition and project design could potentially create new open space to improve community cohesion, livability, and aesthetics, we encourage that this be done in collaboration with community members.

Consider redevelopment. Transportation can help to make cities vibrant and attractive. Where it may be necessary to create new corridors, we recommend first considering redevelopment of underused urban areas, such as, oversized paved areas/parking lots and vacant properties, and make it a priority to use brownfield sites. The clean-up and re-use of contaminated sites would maximize the environmental and community benefits of the project, while preventing loss of community assets.

Apply context sensitive design.⁶ We recommend incorporating structural design, materials, and artwork in station areas and access corridors that are in harmony with the community and preserve the environmental, scenic, aesthetic, historic, and natural resource values of the area. We also recommend optimizing facility safety and communications for both the user and the community, including vulnerable members (elderly, disabled, children, and those of limited English proficiency).

⁵ For example, in the West Seattle project area we note the West Seattle Golf Course, Queen Anne Greenbelt, Elliott Bay Park and Trail, Kinnear Park, the Delridge Dragonfly Garden and Community Center.

⁶ <http://www.wsdot.wa.gov/Design/Policy/CSDesign.htm>

Apply zero or low impact development (ZID/LID). We recommend avoiding and minimizing creation of new pollution generating impervious surface. Use pervious pavement and other LID techniques for managing storm water and avoid building over groundwater recharge areas. Consider de-paving areas as compensatory mitigation for any new impervious surface needed for the project to achieve no net increase in pollution generating impervious surface.

Apply green building and management practices. We recommend following the federal “green” requirements and opportunities that may apply to design, operation, and maintenance of project-related facilities and equipment, such as light rail stations and maintenance buildings. The green requirements pertain to high performance buildings, energy efficiency, and use of renewable energy, water conservation, waste diversion, stormwater runoff, and LEED certification.

- E.O. 13423, Strengthening Federal Environmental, Energy, and Transportation Management, Section 2(f); Section 2(b); Section 9(g)-(h); Section 2(c) (2007)
- E.O. 13514, Federal Leadership in Environmental, Energy, and Economic Performance (2009)
- Energy Independence and Security Act of 2007, 42 U.S.C. Section 17061 *et seq*; Section 17094; US EPA, Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act, 2009
<https://www.epa.gov/nps/urban-runoff-low-impact-development>
- National Energy Conservation Policy Act, 42 U.S.C. Section 8253(a)(1); Section 8253(f)(1); Section 8253(f)(3)(A); Section 2(d)(i); Section 2(e)(ii) (2009)
- Energy Conservation and Production Act, 42 U.S.C. Section 6834(a)(3)(D); Section 6834(a)(3)(A) (2009)
- US Green Building Council: Leadership in Energy and Environmental Design for Existing Buildings, <http://www.usgbc.org>
- USGBC: LEED Public Policies, <https://public-policies.usgbc.org/>

Community impact assessment

We recommend conducting community impact assessments for communities or neighborhoods that would potentially be most affected by the proposed project. These usually include communities adjacent to or bisected by a proposed project, although an analysis of the direct, secondary, and cumulative effects of proposed alternatives may reveal additional affected populations/communities. Impacts from construction, increased number and frequency of trains, safety issues, traffic delay from at-grade crossings, and other issues that may arise, need to be addressed.

The indirect and cumulative effects that would result from growth and development that may be stimulated by the proposed project should be analyzed. For example, the proposed project may stimulate transit-oriented development, commercial and residential mixed-use areas, amenities that improve walkability/livability of the area, and so on. The project could also stimulate development that has the potential to encroach upon or otherwise impact sensitive habitat areas, important community resources, or displace vulnerable or disadvantaged populations. Whether they are positive or negative, we recommend that the EIS analyze and disclose the potential environmental, social, and economic effects.

A key benefit of the indirect and cumulative effects analysis is that it may reveal outcomes that should be avoided, minimized, or otherwise mitigated. As mitigation for project stimulated effects, we encourage the project proponents to work collaboratively with local land use planning entities and affected residents to ensure that the land resource is used wisely and that environmental protections are

incorporated prior to stimulating new growth. Guidance and resource materials for community impact assessment can be found at <https://www.fhwa.dot.gov/livability/cia/index.cfm>.

Environmental justice/vulnerable populations

In compliance with Executive Order 12898 on Environmental Justice, actions should be taken to conduct public outreach and participation that ensures the public and Native American tribes understand the possible impacts to their communities and trust resources. Minority and low-income communities and tribes should be effectively informed, heard, and responded to regarding project impacts and issues affecting their communities and natural and cultural resources. The scope of outreach, impacts analysis, and mitigation should include other vulnerable populations, such as the elderly, the disabled, and children (see comments below regarding Executive Order 13045 on Children's Health and Safety). The information gathered from the public participation process and how this information factored into decision-making should also be disclosed in the EIS. We recommend using EJSCREEN,⁷ the EPA's environmental justice mapping and screening tool, as it combines environmental and demographic indicators that would provide additional data and analysis for the specific geographic areas affected by the proposed project.

Recreational fisheries and fish consumption within the project areas are an important environmental justice issue. The Spokane Street Bridge is a highly used fishery location. For purposes of the Superfund cleanup, there are extensive efforts to promote the fish consumption advisory at this site, as well as other areas of the Duwamish. The EPA is currently planning the construction of a new kiosk for information about the fishery at the Spokane Street Bridge. Because low income and minority populations reside in the project area, it is important to be aware of existing adverse impacts to this community and any project-related activities that could potentially exacerbate these impacts. For more information about the fishing community, fishing locations, and fishing practices in this area, see the *Duwamish Fishers Study* at <http://go.usa.gov/xnCsq>. For information about health risks associated with contaminants in fish, contact Sinang Lee, Seattle/King County Public Health Outreach, at 206-263-1192 or sinang.lee@kingcounty.gov.

Children's health and safety

Executive Order 13045 on Children's Health and Safety directs that each federal agency make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children, and ensure that its policies, programs, activities, and standards address these risks. Analysis and disclosure of these potential impacts under NEPA is necessary because some physiological and behavioral traits of children render them more susceptible and vulnerable than adults to health and safety risks.

Based on current EPA policy and guidance,⁸ an analysis of impacts to children should be included in a NEPA analysis if there is a possibility of disproportionate impact on children related to the proposed action. The EPA views childhood as a sequence of lifestages, from conception through fetal development, infancy, and adolescence. Therefore, exposures to children at each life stage, as well as pregnant and nursing women, are relevant and should be considered when addressing health and safety risks for children.

⁷ <https://www.epa.gov/ejscreen/what-ejscreen>

⁸ <https://www.epa.gov/children/epas-policy-evaluating-risk-children>

Tribal consultation

Tribal treaty resources that may be affected by the proposed project include, but are not necessarily limited to, the Usual and Accustomed fishing areas of the Muckleshoot Tribe, the Yakama Nation, and the Suquamish Tribe, as well as the Muckleshoot Tribe's commercial salmon fishery. The Duwamish Tribe (not a federally recognized tribe) owns a longhouse west of West Marginal Way, near a tribal archaeological site. Other archaeological resources are likely present in the project area.

We recommend that the EIS identify and discuss any effects to tribal treaty resources, including natural resources, historical, archaeological, or traditional cultural places of importance to affected Native American Tribes. If the proposed project would potentially have effects on tribal treaty resources, development of the EIS should be conducted in consultation with all affected tribal governments, consistent with Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments*.⁹

Cumulative and indirect impacts

The project evaluation should consider the effects of the proposed project when added to other past, present and reasonably foreseeable future projects within and outside the project area. Cumulative impacts can result from individually minor, but collectively significant actions taking place over time.

EPA has issued guidance on how we are to provide comments on the assessment of cumulative impacts in *Consideration of Cumulative Impacts in EPA Review of NEPA Documents*, which can be found on the EPA website at: <http://www.epa.gov/compliance/resources/nepa.html>. This guidance includes five key areas of focus when assessing cumulative effects:

- Identify resources, if any, which are being cumulatively affected;
- Determine the appropriate geographic (within natural ecological boundaries) area and the time period over which the effects have occurred and would occur;
- Look at all past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern;
- Describe a benchmark or baseline; and
- Include scientifically defensible threshold levels.

Indirect effects are those that are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, road systems and access, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems (See 40 CFR Part 1508.8).

Invasive species

Ground disturbing activities can create opportunity for establishment of non-native invasive species. In compliance with NEPA and with the Executive Order 13112, analysis and disclosure of these actions and their effects, as well as any mitigation to prevent or control such outbreaks should be included. We recommend that disturbed areas be revegetated using native species and ongoing maintenance (wholly or primarily non-chemical means) to prevent establishment of invasive species in areas disturbed by project activities.

⁹ <https://www.energy.gov/nepa/downloads/eo-13175-consultation-and-coordination-indian-tribal-governments-2000>

Climate adaptation

The EPA recommends that the EIS include a discussion of reasonably foreseeable effects that changes in the climate may have on the proposed project and the project area, including its long-term infrastructure. This could help inform the development of measures to improve the resilience of the proposed project. If projected changes could notably exacerbate the environmental impacts of the project, the EPA recommends these impacts also be considered as part of the NEPA analysis.

From: Ramsay, Heather <heather_ramsay@nps.gov>
Sent: Friday, March 15, 2019 6:35 PM
To: WSB Scoping Comments
Cc: Alan Schmierer <alan_schmierer@nps.gov>; Allison O'Brien <allison_o'brien@ios.doi.gov>;
Myra Barker <myra.barker@rco.wa.gov>
Subject: West Seattle and Ballard Link Extensions

Hi, Lauren -

I'm writing in response to a request for comments on the EIS scoping for the West Seattle and Ballard Link Extension project.

There are a couple of parks in the project area that if slated for impact would require Secretary of the Interior approval and suitable replacement property. These include Elliot Bay Park (Land and Water Conservation Fund) and Camp Long (Urban Park and Recreation Recovery). Current route configurations appear to avoid these parks but Sound Transit should be aware of the additional federal review needed if route options change.

If you have any questions about UPARR, please feel free to contact me. If you have questions about LWCF, I recommend you contact Myra Barker (cc'd) with the Washington State Recreation and Conservation Office (RCO). In the state of Washington, the RCO administers LWCF on behalf of NPS.

Thank you,

Heather

Funding and Protecting Parks Where you Live

Heather Ramsay, Program Officer
National Park Service, State & Local Assistance Programs
909 First Avenue, Seattle, WA 98104-1060
206.220.4123 - www.nps.gov/lwcf or /uprr





STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000
711 for Washington Relay Service • Persons with a speech disability can call (877) 833-6341*

April 5, 2019

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

**Re: Sound Transit West Seattle and Ballard Link Extensions Project
Ecology SEPA #201900776**

Dear Lauren Swift:

Thank you for the opportunity to provide comments on the **Sound Transit West Seattle and Ballard Link Extensions Project**. We understand that the deadline to provide comments has passed. We hope that Ecology's comments provided below will still be considered.

Based on review of the documents associated with this Project, the Department of Ecology (Ecology) has the following comments:

AIR QUALITY PROGRAM, CLIMATE POLICY SECTION

Gail Sandlin, gail.sandlin@ecy.wa.gov, (360) 407-6860

Scoping Document AE 0036-17 pg. 11 Exhibit 5-1

<https://www.soundtransit.org/sites/default/files/documents/west-seattle-ballard-link-extension-scoping-information-report-20190215.pdf>

Climate Change and Climate Resilience should be included as an Environmental Resource Category.

TOXICS CLEANUP PROGRAM

Rick Thomas, richard.thomas@ecy.wa.gov, (425) 649-7208

Sound Transit should expect and be prepared to encounter contaminated soil and groundwater (depending of the depth of excavation) along the path of the chosen route, regardless of which route is chosen for the new rail line. A plan to identify, notify Ecology (WAC 173-340-300), handle, and treat contamination when encountered must be in place as specified in the Model Toxics Control Act (MTCA) RCW 70.105D and the MTCA Cleanup Regulations WAC173-340. For information or a list of contaminated sites currently listed along a specific route please contact Ecology. Other contaminated sites may exist in addition to those currently listed by Ecology.


Lauren Swift

April 5, 2019

Page 2

Thank you for considering these comments from Ecology. If you have any questions or would like to respond to these comments, please contact one of the commenters listed above.

Sincerely,



Tracy Nishikawa
SEPA Coordinator

Sent by email: Lauren Swift, lauren.swift@soundtransit.org
WSBLink@participate.online

ecc: Gail Sandlin, Ecology
Rick Thomas, Ecology

Communication ID: 346271

From: Recreation and Conservation Office

Scoping Comment:

Hi Lauren,

This message is in response to the request for comments during the scoping process for the West Seattle and Ballard Link Extensions.

The Recreation and Conservation Office has funded outdoor recreation, habitat protection, and salmon recovery projects throughout the Seattle area. The state-funded projects that may be impacted by the three alternatives being considered for the West Seattle and Ballard extensions include the following.

- City of Seattle Parks, 14th Ave. NW Shilshole Bay Boat Ramp, RCO #92-290, here's a link to the project information

<https://secure.rco.wa.gov/prism/search/projectsnapshot.aspx?ProjectNumber=92-290>.

- City of Seattle Parks, Ship Canal Trail and Park, RCO #91-249, here's a link to the project information <https://secure.rco.wa.gov/prism/search/projectsnapshot.aspx?ProjectNumber=91-249>.

There are two state-funded projects at Freeway Park that may be in the area impacted, those are RCO #69-186 with link <https://secure.rco.wa.gov/prism/search/projectsnapshot.aspx?ProjectNumber=69-186> and RCO #73-001 with a link

<https://secure.rco.wa.gov/prism/search/projectsnapshot.aspx?ProjectNumber=73-001>.

Heather Ramsay, with National Park Service, has notified you via an email dated March 15, 2019, of the federally funded projects (LWCF) in the general area and so I'm not including those. As she noted, our agency administers the LWCF on behalf of the NPS.

Please include our agency in the review process and I will be our point of contact.

If you have any questions, please let me know.

Myra Barker



April 2, 2019

Ms. Lauren Swift, Central Corridor Environmental Manager
West Seattle Ballard Link Extensions Scoping
401 S Jackson St
Seattle WA 98104
WSBScopingComments@SoundTransit.org

Re: West Seattle and Ballard Link Extensions Scoping

On behalf the Port of Seattle (Port) and Northwest Seaport Alliance (NWSA), thank you for the opportunity to provide scoping comments to begin the NEPA/SEPA environmental review.

In 1911, the Port of Seattle was authorized by the citizens of King County under Chapter 53 of the Revised Code of Washington to serve as a public port authority, charged with ensuring that Seattle's deep-water harbor is protected to serve as an economic engine for the region. In 2015, the ports of Seattle and Tacoma formed a marine cargo operating partnership, the NWSA. The Alliance is the fourth-largest container gateway in North America.

The Port and Alliance operate and maintain the more than \$1 billion in investments made into maritime and industrial operations, and work to protect the tens of thousands of family-wage jobs and \$4.0 billion in revenue that these sectors generate for the region and state. The Port and NWSA are assets of statewide significance, serving as critical gateways for the agricultural producers and manufacturers across Washington. These gateways cannot be replicated elsewhere and provide a crucial function in the resiliency of our state's economy. These facilities could be heavily impacted at the south, central, and north ends of the proposed alignments. No other single agency or entity is similarly impacted, and it is imperative that all efforts are made to avoid and/or mitigate adverse impacts to these crucial economic assets wherever possible.

As stated in our early scoping letter, we have three primary objectives for Sound Transit 3 projects:

1. Enhance service to Sea-Tac Airport for passengers and employees, from a web of cities throughout the region;
2. Strengthen access to Port facilities, both existing and future developments; and
3. Improve regional transportation for personal mobility, while protecting maritime and industrial land uses and freight mobility.

We appreciate Sound Transit's broad stakeholder engagement on the development of alternatives for extensions to West Seattle and Ballard, and the direct engagement of design and planning staff with agencies in the proposed alignments.

Sound Transit staff has worked closely with Port and NWSA staff to better understand and work towards addressing concerns near port terminals both during construction and during link light rail operations. Proposed routes, especially north of the Spokane Street corridor, have the potential to create significant negative impacts on cargo operations and water-dependent logistic functions, with resulting negative economic effects across several industries, far beyond the Seattle harbor and King County.

Particularly problematic, the expected impacts during the estimated five-year construction period could damage international container cargo operations and significantly contribute to truck and other traffic in the already congested Spokane Street corridor. We remain unconvinced that the potential effects, especially with a route north of the Spokane Street corridor, could be mitigated for the Port, the NWSA, and other maritime/industrial businesses. From our perspective, this is not sufficiently covered by the current approach to measuring the economic impacts of the project, yet it is essential in ensuring the continued economic viability of these businesses.

The accompanying document outlines the areas where a thorough review of proposed alignments is necessary to determine how they could impact the public benefit the Port and the NWSA are charged with providing.

West Seattle Segment

- Spokane Street Corridor alignments could pose significant economic, environmental and operational impacts not only to Port and NWSA facilities, but to maritime industrial businesses that must have waterfront access to survive. Proposed alignments must ensure those facilities remain fully operational during and after construction, while ensuring access for trucks and rail serving those facilities. A crossing north of the Spokane Street must be given a thorough review to ensure that the cost estimates as well as impacts are accurately gauged.
- Please evaluate Duwamish crossing alignment slightly farther south than that considered in the representative alignment, across the far southern tip of Harbor Island, to determine if this alignment may present opportunities to further reduce impacts to existing businesses.

Interbay/Ballard Segment

- Moveable bridges across the ship canal may have significant impacts on maritime mobility as well as transit, and the cost, operational, and environmental effects should be studied as part of the environmental review process.
- Smith Cove station location will have significant impacts to ridership, with the location on the west side of the corridor appearing to serve more developed land uses, and capturing potential riders from Port properties, including employees and cruise passengers.

Thank you for your invitation to the Port to serve as a Cooperating Agency and to the NWSA as a Participating Agency, roles we believe will further ongoing cooperation between our agencies. We have expressed our interest in entering into a partnership agreement to define roles and responsibility in how the agencies will work together on project planning and environmental documentation.

We ask that these impacts effects be fully vetted through the environmental review process, and that the Board designate a route alignment with a southern crossing of the Spokane Street corridor as the preferred alternative. Please reference our detailed scoping comments attached. Thank you for your consideration and we look forward to our continued involvement.

Sincerely,



Stephen P. Metruck
Executive Director
Port of Seattle



John Wolfe
Chief Executive Officer
Northwest Seaport Alliance

Attach A – Technical Comments
Attach B – POS - Cooperating agency acceptance
Attach C – NWSA - Participating agency acceptance
Attach D – POS/NWSA Early Scoping comments, March 2018
Attach E – POS/NWSA Level 2 comments Sept 2018

ATTACHMENT A - West Seattle and Ballard Link Extensions Scoping - April 2, 2019

Thank you for the opportunity to provide these scoping comments. We look forward to integral involvement in the environmental review of the West Seattle and Ballard Link (WSBLink) Extension. We appreciate your invitation to the Port of Seattle to act as a Cooperating Agency (Attachment B) and to The Northwest Seaport Alliance (NWSA) to act as a Participating Agency (Attachment C) and accept both of those roles. Please see Attachments B and C for the signed forms. Additionally, we have expressed our interest in entering into a partnering agreement that would further define roles and responsibilities in how our agencies will work together on project planning and environmental documentation. We look forward to achieving that agreement in the coming weeks.

We have been involved throughout the ST3 Sound Transit planning process, since the 2014 ST3 Long Range Plan Update. We consistently support Sound Transit's investment in the regional transit system, especially for improved personal mobility to Port facilities. The Port and NWSA are also encouraged by the project's potential to protect maritime and industrial land uses and freight mobility, by improving the efficiency of the overall transportation system in the city and the region. Potential benefits include: (1) avoiding negative effects on critical transportation routes, (2) providing improved personal mobility access to port maritime passenger and cargo facilities, and (3) anticipated improvements in the vehicle flows on public right-of-way.

Our comments parallel those in our SEPA Early Scoping letter from 3/5/18, included as Attachment D, as well as comments from our Level 2 Alternatives Development letter to members of the Elected Leadership Group from 9/14/18, Attachment E, for completeness in this NEPA process. We request that the DEIS comprehensively analyze the issues raised in this, as well as these previous letters, and identify potential effects, along with opportunities to modify the project plans to avoid or minimize negative impacts.

1. Purpose & Need
2. Potential Alternative Alignments – issues, concerns, areas of agreement, options
Comments relative to all three alternatives
 - 2.1 System Expansion
 - 2.2 Duwamish Crossing/SODO
 - 2.3 Interbay/Ship Canal CrossingAlternatives:
 - 2.4 Alternative 1, ST3 Representative Project
 - 2.5 Alternative 2, "Elevated"
 - 2.6 Alternative 3, "Tunnel"
3. Elements of the Environment

1. PURPOSE & NEED

We generally support the Purpose and Need statement. We expect that in this document, Sound Transit will recognize the Port's mission, and communicate how it can deliver and operate the light rail extensions in a manner that is compatible with existing public purposes for which the Port and the NWSA are responsible.

Under state legislation, King County citizens voted in 1911 to create the public Port of Seattle – a special purpose municipal corporation, to ensure that harbor facilities were managed for the benefit of all citizens. Our mission is to create good jobs across the state by advancing trade and commerce, promoting manufacturing and maritime growth, and stimulating economic development. The Growth Management Act recognized the importance of our facilities by designating them as essential public facilities.

In 2015, the ports of Seattle and Tacoma formed a marine cargo operating partnership –The Northwest Seaport Alliance – under the authority of chapter 53.57 of the Revised Code of Washington. The NWSA is the fourth-largest container gateway in North America. Regional marine cargo facilities also are a major center for bulk, breakbulk, project/heavy-lift cargoes, automobiles and trucks.

The critical economic role of the Port facilities, now part of the NWSA, was reinforced by the 2009 inclusion of the requirement for a Container Port Element, RCW 36.70A.085, for the cities of Seattle and Tacoma. This amendment to the GMA showed legislative support for the continued economic development generated by Washington’s major ports by declaring that:

“It is the intent of the legislature to ensure that local land use decisions are made in consideration of the long-term and widespread economic contribution of our international container ports and related industrial lands and transportation systems, and to ensure that container ports continue to function effectively alongside vibrant city waterfronts.” (RCW 36.70A.85, (Findings— Intent—2009 c 514.)

Seattle’s Container Port Element was finalized by the City of Seattle in 2012. See in particular Policy CP 1.6 about preserving freight access to the terminals and Policy CP 1.2 about protecting land near the port with zoning for port-related activities.

As these GMA elements illustrate, to be successful in our mission, it is critical for other jurisdictions and government agencies like Sound Transit to recognize the complicated nature of our operations to statewide economic health and collaborate closely when major projects might impact our assets.

As the project proposes to cross two of the region’s largest and most productive industrial zones (Manufacturing/Industrial Centers [MICs]), the project purpose should acknowledge that no harm should come to facilities and operations in these areas essential to delivery of the Port’s and NWSA’s mission.

Pursuant to the authority and mission referenced above, the Port of Seattle has engaged in extensive local planning efforts to develop the Port’s Century Agenda and a Long-Range Plan to articulate how the Port will deliver its mission. These critical public documents focus on the importance of close proximity of industrial lands to the region’s urban center with our goal to “Anchor the Puget Sound urban-industrial land use to prevent sprawl in less developed areas.”

Similarly, the NWSA operates under a Strategic Business Plan outlining how we’ll address the competitive challenges to grow cargo volumes, create jobs and improve financial performance. It identifies Terminal 5 (T-5) as a strategic terminal, along with other terminals in Elliott Bay.

As the Link extensions pass through the MICs (Duwamish and Ballard-Interbay) and over state shorelines, planning, design and construction must respect the vitality and economic contributions of the maritime and industrial economic sectors. This is because those sectors closely rely on the

interaction of existing and future industrial land uses and critical transportation infrastructure supporting freight access and mobility. The transportation system in our region must move passengers and freight efficiently and safely. As the Puget Sound region invests in improving passenger mobility through Link extensions, we must not impede existing industrial capacity and capability and should not foreclose future industrial facilities and operations. In this context, it is essential to note that:

- Port maritime and NWSA facilities cannot be moved or replicated elsewhere, due to their very nature, and impacting their operations jeopardizes a significant economic and employment engine for the region and state
- Existing freight mobility (across all modes: road, rail, marine, etc.) must be maintained, and the project designed to not pre-empt future improvements to freight infrastructure
- MIC employment densities are lower than those in other regionally- and locally-designated Centers, and do not support traditional transit-oriented-development densities.
- Traditional transit-oriented development (TOD) approaches, which typically include housing, are not appropriate in MICs where residential uses are not allowed by zoning.

Industrial land, and maritime industrial land in particular, is a scarce resource in Seattle. As context, Washington's Shorelines Management Act (Chapter 90.58 RCW) arose out of the recognition that shorelines areas are a scarce resource and a resource that affects nearly everyone's life in one way or another. In fact, the act is implemented through mandates on local government to balance three goals of shorelines management: 1) providing for uses that require a shoreline location, 2) protecting ecological function, and 3) providing public access to shorelines. At the Port, we are keenly aware of the issue of water dependent uses. Route selection for WSBLink extensions must be mindful of the fact that **relocation of maritime businesses is very difficult, and in some cases impossible.**

Several of your bullets reference adopted regional and local plans and consistency with local land use plans and policies, and under those references it is important to acknowledge the unique policies and zoning intended to protect and grow industrial and maritime bases.

The current **Purpose** includes eight bullet points, which are all important. In keeping with our comments above, we propose amending the eighth bullet and adding the following bullet as well:

- Preserve and promote a healthy environment and economy by minimizing adverse impacts on the natural, built, and social environments through **complementary design and** sustainable practices.
- Recognize other critical public institutions and purposes by partnering effectively to plan, deliver, and operate the project in a manner that is compatible with existing and planned economic development uses within Manufacturing Industrial Centers and the freight infrastructure supporting them.

Several bullets also focus on "regional mobility for all" and "a healthy environmental"; essential broad-based elements of the Ballard-Interbay and West Seattle project. We appreciate that this system expansion will improve personal mobility access to and from Sea-Tac Airport and areas adjacent to the airport for regional travelers, visitors and employees in the airport area. Similarly, improved access to Port maritime facilities affected by the project should be elements of the

project, including service to passenger vessel/cruise terminals and for workers at all port facilities in the Ballard-Interbay area and in the south harbor and Duwamish industrial areas.

The current **Need** section includes six bullet points, and similarly, we recommend these reflect the difference for station areas in the MICs. Consider either of the following underlined additions to bullet six:

- Regional and local plans call for increase residential and/or employment density at and around most HCT stations ... (or outside of Manufacturing / Industrial Centers)

Finally, we believe that Sound Transit will need to develop these extensions in a cooperative working relationship among multiple agencies with individual public missions. We will support development of the light rail extensions, while stewarding our public mission and assets, and pledge to work with our fellow agencies to find the best mutually beneficial coincident outcomes. We ask that Sound Transit commit to implementing the projects in a manner that maintains the Port's ability to responsibly carry out its mission and responsibilities to the public we both serve.

2. Potential Alternative Alignments – issues, concerns, agreement, options

2.1 System Expansion: The Port and NWSA support the Link Light Rail system and the extensions. We urge Sound Transit to integrate amenities or mobility services that would improve HCT access to Sea-Tac Airport and other regionally designated centers and passenger intermodal hubs. Air passenger ridership on Link has unique characteristics including infrequent trips, carrying luggage, discomfort with the airport/Link station walk, or early/late travel times. We ask that all new vehicles provide space for luggage, an important feature not well incorporated into existing vehicles. We also ask that all new vehicles provide added space for bicycles, as Link is the main access to Sea-Tac for employees or passengers using bicycles for the majority of their airport trip.

By adding new connections to the regional Link system, WSBLink extensions can benefit from other region-wide programs for system access, innovation and technology. We hope that these programs could be applied to the WSBLink program to provide first- and last-mile support for riders and other innovative approaches to increase ridership to and from the airport.

2.2 Duwamish Crossing/SODO: Each alternative crosses the Duwamish on an aerial guideway, either north or south of the Spokane St Viaduct. Sound Transit has invested time, along with our agencies, during the alternatives development phase, to understand and work towards addressing concerns about construction near port terminals. However, we remain unconvinced that the potential effects of this construction could be mitigated for the Port, the NWSA, and other maritime/industrial businesses. These routes have the potential to create significant negative impacts on cargo and supporting water-dependent logistic functions, with resulting negative economic effects across several industries, far beyond the Seattle harbor and King County. **Given the existing and projected container volumes in the North Harbor (2.5-3.0% growth per annum), please study any and all potential operational impacts that would result in delays to terminal access pre-construction, during construction and after completion, including but not limited to lane closures, material staging, material movement, placement of columns, truck and rail delays, and terminal access.**

During construction and in Link service operation, the Link extension must preserve and protect the truck and rail access to our T-5, T-18- including the liquid bulk facility on the southern end of the terminal, T-104 and access to T-102 on the southern tip of Harbor Island, a property that consists of the Port of Seattle's Harbor Marina Corporate Center, commercial marine vessel berths and two marinas. East-west mobility in the Spokane St corridor is extremely congested and complex. The NWSA operates the nation's fourth-largest gateway for international containers and some maritime industrial properties. The light rail expansion through SODO to West Seattle must be cognizant of potential effects to the nation's international trade flows, and must avoid, minimize, and off-set any potential negative effects on these facilities, including avoiding foreclosure of future facility improvements in marine cargo and passenger facilities and operations.

The **"Terminal 5 (T-5) Wharf Rehabilitation, Berth Deepening and Improvements Project"** is projected to be completed, and T-5 fully operational, by the time the West Seattle Link goes into construction in 2025. As a permit condition for the T-5 redevelopment, the NWSA will request approval from the Federal Rail Administration (FRA) to implement a Quiet Zone (QZ) corridor between the T-5 gate and the West Duwamish rail bridge. It will eliminate uncontrolled at-grade crossings in the corridor. The foundations and columns for the proposed alignment of the West Seattle Link bridge would need to be placed in a manner that will preserve a potential quiet zone corridor, the at-grade crossing access to existing businesses, and the utilization of the access road east of the railroad to allow the business access. Based on the current design, the (by 2025) remaining at-grade rail crossing providing access to the business on the east side of the railroad, will be located between the Spokane and the West Seattle Bridge. Please note that the NWSA is providing more than \$5 million in funding to establish the QZ.

Both rail and vehicle access to and from T-5 and T-18 must be protected and preserved without limiting the freight movement in the international supply chain, both in the final configuration and during construction. The BNSF rail tracks, which also run south of Spokane St, provide critical access for multiple users to Harbor Island and T-5, and other industrial properties in West Seattle, so avoidance of those tracks is critical for piers, footings, and any construction impacts. The alignment must not pre-empt any future freight rail capacity expansion or improvements, including potential grade-separation/overpass rail and vehicle access structures, at the railyards and terminals, or in the critical SW Spokane St corridor.

An early alternative eliminated in Level 1 proposed a Delridge station at SW Spokane St. It had a number of substantive flaws: congestion on lower Spokane St and the potential to conflict with port and nearby industrial operations should be evaluated if this alignment is reconsidered.

Already challenged with limited access, the Port's **Harbor Marina Corporate Center** (on Harbor Island at T-102, south of Spokane St.) is a 139,333-sq-ft business park populated by office, warehouse, flex industrial, and light manufacturing tenants, many of whom support maritime shipping and ancillary businesses. SSA Marine (T-18's marine terminal operator), also maintains offices on Harbor Island, adjacent to T-102, that provide support for their extensive operations on Harbor Island. Also, the Port's T-104 lies between East Marginal Way and the East Waterway, west of the East Marginal Way Grade Separation. Further design work will also require close coordination with us regarding facilities access, impacts of construction, aerial guideway column placement and light rail operations.

For the **Link bridge over the commercial waterway**, the air draft should be at least as high as the West Seattle Bridge and column spacing within the waterway should be at least 200' and in alignment with the existing navigation channel beneath the Swing Bridge and the BNSF trestle. During construction, the Duwamish waterway must not be restricted from navigation of barges up to 105' beam by 420' length and air draft currently available. We understand you are working with the United States Coast Guard to meet these requirements.

In **SODO**, all alignments use **the E-3 busway**. Beneficially, this means no direct capacity loss in the SODO public rights of way, yet the review should clarify the effect of displacement of buses to the city streets. The arterials in SODO are already constrained and certainly congested during peak commute hours. **We ask that you study the impact on freight mobility in SODO and Harbor Island resulting from the displacement of the buses from the E3 busway onto city streets.** Unless throughput and operational capacity can be maintained through other means, impacts to avoid or mitigate include:

- Loss of lanes
- Loss of turning or freight parking/loading capacity due to dedicated transit-ways or aerial guideway columns
- Construction activity of guideway or stations and
- Increase number of at-grade rail crossings in industrial areas

Of note would be impacts of east/west overpasses proposed at Lander and Holgate. Please evaluate even short-term closures of lanes along a truck route or temporary impacts to terminal operations. In summary, the project construction and operation must avoid or mitigate any **negative effects on freight access and mobility** both during construction and in the final configuration.

Near the Chinatown/International District station, alignments are proposed on 4th and 5th Avenues South. Please consider construction effects of displaced vehicles currently using those streets and how they would detour through the area. Additionally, this station is likely the closest to the newly proposed fourth cruise berth for the Port of Seattle harbor. Anticipated to be completed in spring 2022, it will benefit from good connections for passengers choosing to arrive or depart by public transit.

2.3 Interbay Facilities and Infrastructure and Ship Canal Crossing: Each alternative travels through Interbay and across the Lake Washington Ship Canal (Ship Canal). The Port supports the extension to Ballard for service to adjacent properties, but again with significant concerns regarding port terminals and potential for negative effects on the Ballard-Interbay Manufacturing/Industrial Center's (BINMIC's) economic vibrancy. The Ballard Link Extension corridor is in the center of the 615-acre BINMIC, anchored by Fishermen's Terminal and Terminal 91 (T-91), both essential water-dependent marine industrial assets, with related effects on other adjacent industrial uses and activities. **We ask that you study any impacts on vessel movements in the ship canal.**

We look forward to stations at Smith Cove and Interbay to allow Port customers, employees and tenants better access to the Smith Cove cruise terminal and marina facilities. We appreciate that the expansion of the light rail system through the region will make many more trips possible by transit. We encourage analysis and evaluation of light rail effects on plans for replacement / rehabilitation of the existing Garfield St/Magnolia Bridge and 15th Avenue West Ballard Bridge under the city of

Seattle jurisdiction. Please evaluate and include safe and convenient facilities to accommodate passenger movements to and from transit and cruise facilities. Likewise, any station with the potential to serve port employees and customers should have similar treatment. **We ask you to study any impacts to access to and from T-91 and anything that would impact operations of the T-91 cruise terminal and industrial operations.**

BINMIC is headquarters to industrial, maritime and fishing, and manufacturing activities, many directly dependent on the ship canal access. The light rail expansion to Ballard must be sited with regard to the BINMIC operations. Many vessels from the North Pacific fishing fleet homeport at facilities on the Ship Canal, Salmon Bay, and T-91, most notably **Fishermen's Terminal**. The decision of the vessel owners to make this their homeport is the basis for an extensive network of nearby businesses engaged in supplying those vessels.

Terminal 91 is a 200-acre facility which serves multiple customers, which is the homeport of the commercial fishing fleet, and which hosts the **Smith Cove Cruise Terminal**, a two-berth cruise facility. Along with the **Bell Street Pier Cruise Terminal**, these berths have led to twenty years of growth in Seattle's tourism industry, driven by the burgeoning cruise industry. Additionally, T-91 includes significant acreage for which the Port is currently planning industrial redevelopment. The T-91 Uplands Development project is formally underway with a recent \$4 million design authorization by the Port commission. Further funding is included in the 2019-2023 Capital Improvement Plan. Similarly, redevelopment is underway for two buildings at Fishermen's Terminal.

The Port also operates the Maritime Industrial Center, and four recreational marinas at Bell Harbor, Harbor Island, Salmon Bay Marina and Shilshole Bay Marina. The Maritime Industrial Center offers moorage, concrete dock space (used for loading, repair/maintenance, storage and staging), and office and shop space. The total economic impacts of Port of Seattle related fishing at T-91, Fishermen's Terminal and the Maritime Industrial Center is 11,300 jobs, \$543 million annual payroll, and \$1.4 billion annual business revenue. (Port of Seattle, Port of Tacoma, The Northwest Seaport Alliance Economic Impact Analysis, Community Attributes, Inc., Pending release, likely Spring 2019.)

Siting of the Ballard Link extension must focus on minimizing loss of capacity on the freight spine. **Please study impacts freight mobility on 15th Avenue West.** Unless throughput and operational capacity can be maintained, impacts to avoid or mitigate include:

- Loss of lanes
- Loss of turning or freight parking/loading capacity due to dedicated transit-ways or aerial guideway columns
- Construction activity of guideway or stations, and
- Increased number of at-grade rail crossings in industrial areas

The Elliott Avenue/15th Avenue W corridor has no nearby parallel routes that could accommodate vehicles or truck-turn maneuvering both in final operations and during construction. Such functions must be incorporated into corridor design. In summary, the project construction and operation must avoid or mitigate any **negative effects on freight access and mobility.**

ALTERNATIVES

2.4 Alternative 1, ST3 Representative Project

The three-level screening process conducted over the past year provided highly beneficial opportunities to study, gather input about and build awareness about the Representative Project.

We support the extension to West Seattle, albeit with significant concerns regarding our port terminals and facilities, as well as concerns for the supporting freight infrastructure for road, rail and marine modes, and concerns for the potential for effects to the transportation and economic vibrancy of the Duwamish MIC. Similarly, in West Seattle, please study the effects of the Delridge station north of Andover on freight mobility for the Nucor Steel facilities and their operations.

The Port and NWSA own and operate many facilities in the Duwamish, especially water-dependent uses on the shoreline and nearby, as described in Section 2.1 above. The representative alignment parallels the southern side of the Spokane St right-of-way. **Staff has reported that this alignment is estimated to cost \$300 million less than a crossing north of the Spokane St right-of-way.** We ask you to study the impacts to terminal access and delays in freight mobility during construction and potential for a permanent loss of cargo volumes from a northern crossing.

In addition, we request that Sound Transit explore an **additional option** for the crossing south of the bridge, with the aerial structure built **approximately 350'** farther south of the proposed alignment, crossing the southern tip of Harbor Island. Such a location could avoid the critical BNSF tracks and SSA Marine's global headquarters and server farm. It would seem premature and inadvisable to not pursue a better understanding the details of this route as an option to the alignment closer to the Spokane St Corridor.

In the **Interbay Section**, as detailed in our Early Scoping comment letter (3/5/18), the Port has **tremendous concern** about the Representative Project alignment impacts on Fishermen's Terminal and in the Elliott Ave and 15th Ave W rights-of-way. We understand there is no durable consensus on the Elected Leadership Group for this alignment. However, should it proceed into the environmental review (or other discarded Level 1 or Level 2 alternatives), please incorporate the detailed comments from our Early Scoping concerns with effects of this alignment on the freight spine of the city and on Fishermen's Terminal.

2.5 Alternative 2, West Seattle Elevated/C-ID 5th Ave/Downtown 6th Ave/Ballard Elevated

The three-level screening process also provided highly beneficial information about the gold/brown elevated alternative.

Crossing the Duwamish, this alternative mirrors the Representative Project, Alternative 1. Please reference our comments above: significant concerns regarding our port terminals and facilities, as well as concerns for the supporting freight infrastructure for road, rail and marine modes, and concerns for the potential for effects to the vibrancy of the Duwamish MIC. **Staff has reported that this alignment is estimated to cost \$300 million less than a crossing north of the Spokane St right-of-way.** We ask you to study the impacts to terminal access and delays in freight mobility during construction and potential for a permanent loss of cargo volumes from a northern crossing

In addition, we request that Sound Transit explore an **additional option** for the crossing south of the bridge, with the aerial structure built **approximately 350'** farther south of the proposed alignment, crossing the southern tip of Harbor Island. Such a location could avoid the critical BNSF tracks and SSA Marine's global headquarters and server farm. It would seem premature and inadvisable to not pursue a better understanding the details of this route as an option to the alignment closer to the Spokane St Corridor.

In the Interbay Section, this alternative appears to have benefits over Alternative 3, and appears decidedly superior to Alternative 1.

The **tunnel under Elliott Ave W** may have less freight impacts during operations than an aerial crossing of 15th or Elliott. The DEIS must identify construction methodology and impacts of staging, constructing, and operating this tunnel. Additionally, potential effects on the adjacent freight and passenger rail tracks and operations must be identified.

The **Smith Cove station** effects on ridership volumes of Alternative 2 versus Alternative 3 should be explained as well, since the location on the west side of the corridor appears adjacent to more highly developed land uses. **Potential riders** from Port properties include **employees**, numerous marine industrial tenants, and **cruise terminal passengers** served by T-91, as well as tenant operations at Terminal 86.

There is very little public information to-date on the **fixed bridge crossing** of the ship canal in this 14th Avenue West corridor. Please describe the effects of a fixed bridge crossing, the touchdown points at either end, and the area under the bridge

A Link bridge over the Ship Canal should have air draft at least as high as the Aurora Bridge. Column spacing within the waterway should be at least 200' and in alignment with the existing navigation path beneath the Ballard Bridge. During construction, the Ship Canal should not be restricted from navigation of vessels up to 78' beam by 400' length, and air draft currently available under the Aurora Bridge. If a bridge is selected for a Ship Canal crossing, it should be a fixed structure, not a bascule or other "opening" span, so that marine traffic and light rail are completely independent of one another.

2.6 Alternative 3, West Seattle Tunnel/C-ID 4th Ave/Downtown 5th Ave/Ballard Tunnel

Again, the three-level screening process conducted over the past year provided good information about the blue "tunnel" alternative.

Crossing the Duwamish, this alternative deviates from the Representative Project by crossing on the north side of the Spokane St Viaduct. This means construction and operations would occur on and above T-25 and T-18 and the access points to T-5 for both road and rail. This has the potential to dramatically affect the functioning of port terminals, including many supporting businesses. Our concerns regarding the port terminals and facilities, the supporting freight infrastructure for road, rail and marine modes, and the potential for effects to the vibrancy of the Duwamish MIC, multiply with the number of piers and structures constructed on the very space used for terminal operations and access. **Staff has reported that this alignment is estimated to cost \$300 million more than a crossing south of the Spokane St right-of-way.** We ask you to study the impacts to terminal access and delays in freight mobility during construction and potential for a permanent loss of cargo volumes from a northern crossing

We appreciate that Sound Transit has invested time, along with the Port and the NWSA, during the alternatives development phase, to understand and work towards addressing these concerns. However, we remain unconvinced that the potential effects of this construction could be mitigated for the Port, the NWSA, and other maritime/industrial businesses, including the longshore dispatch hall. These routes have the potential to create significant negative impacts on cargo and supporting water-dependent logistic functions, with resulting negative economic effects across several industries, far beyond the Seattle harbor and King County. The expected impacts during the

estimated five-year construction period could **damage international container cargo operations** and significantly contribute to truck and other traffic in the already congested Spokane St corridor. From our perspective, this is not sufficiently covered by the current approach to measuring the economic impacts of the project, yet it is essential in ensuring the continued economic viability of these businesses.

The trucks gates for T-5 and T-18 are accessed via South Spokane St from I-5, SR99, W Marginal Way SW, and E Marginal Way S. T-18 is the busiest container terminal in the state, currently it is served by an average of about 4,000 daily truck trips (NWSA RFID data, March 2019). S Spokane St is the primary route for trucks getting to and from this terminal. It provides access between the container terminal and the railyards (located off E Marginal Way S) as well as access to and from I-5 and I-90. None of the other terminals at the NWSA can accommodate the volumes at T-18 and anticipated at T-5. T-5, once in operation, will also incur significant truck volumes, with estimates ranging from 1,000 to 3,600 daily trips (T-5 Wharf Rehabilitation, Berth Deepening and Improvements Project, FEIS, Transportation Technical Report, 2016).

Further consideration of an alignment north of the West Seattle Bridge must carefully address the feasibility of committing to points such as the following during construction. These must also be studied and applied to alignments south of the bridge, as in Alternatives 1 and 2, however this alignment traverses the container terminals directly.

- Good access to the NWSA container terminals **must be maintained throughout construction** for road and rail.
- Temporary business disruptions and displacements must be minimized, and unavoidable business displacement mitigated.
- Traffic flows along the S Spokane St corridor between W Marginal Way SW and I-5/I-90, will require **enforced limitations on construction traffic** during commuter peak hours as well as midday freight peaks on week days, unless other innovative approaches that protect freight mobility are found. Unlimited hauling may be possible at night and non-event weekends.
- Construction activities along S Spokane St that disrupt terminal access must provide alternative access that fully accommodates the same volume and types of traffic, including:
 - Truck traffic into gate queue area
 - Pedestrian/bicycle access
 - Emergency & fire vehicle access
 - Displaced parking areas, and
 - Employee traffic
 - Security fencing.
 - Vendor delivery access
- Construction staging/laydown areas should **reside outside the terminal property**.
- Construction haul routes should be selected to **minimize disruption** to freight routes
- Maintain traffic **signalization and signage** along Spokane Corridor to facilitate freight movement
- Maintain north/south cross streets
- Agency coordination requirements such as **regular meetings to plan traffic** and terminal operational impact mitigation should be clearly defined and enforced leading up to and throughout construction.

In addition to the possible impacts to T-18, our neighboring container facility, T- 5, must also be considered. We expect it to again be operational during Sound Transit's targeted construction window for the West Seattle segment. At present, the port has received land use and building permit approvals for implementation of the T-5 Cargo Wharf Rehabilitation, Berth Deepening, and

Improvements project. Phased construction is anticipated to begin in 2019, with operation of the improved marine cargo facility in 2021. As noted above, we anticipate that similar needs as T-18 will need to be addressed for T-5.

Terminal 25 (T-25), at the southeast margin of the East Waterway would also be affected by a North alignment. T-25, operating as a combined facility with Terminal 30 (T-25/30), includes significant existing and future marine cargo and environmental assets. The North alignment must avoid and minimize disruption of T-25/30 marine cargo operations. In addition, the port is planning for use of the south portion of T-25/30 as a significant estuarine habitat restoration area. Placement of rail line columns and over-head structures in this location has the potential to substantially diminish planned uses for habitat on this site. Also, a portion of the terminal is currently used for truck parking. The area is one of very few areas for off-street overnight parking. Its capacity should be maintained.

There are other industrial businesses that also rely on the waterfront access with similar potential effects from a northerly alignment whose businesses should receive similar accommodations.

In addition to potential negative construction effects, placement of light rail north of the West Seattle Bridge has the potential to impede adjacent and nearby marine industrial logistics and support businesses and other industrial uses and activities important to the south harbor area. While the Duwamish crossing options just south of the West Seattle Bridge will also prove challenging during construction, the potential impact on international cargo operations would be much less significant. The interdependencies and co-location benefits of businesses in SODO mean that losing some businesses may amplify or result in un-anticipated negative effects throughout the supply chain. Further, scarce availability of equivalent shore-side properties with essential navigational access characteristics to relocate water-dependent uses must be considered.

In the Interbay Section, further information is needed to clarify construction methods of this alternative. The crossing of 15th near Armory Way may have negative effects on the freight corridor. The DEIS should identify construction methods and effects of this elevated section. Additionally, please identify potential effects on the adjacent freight and passenger rail tracks and operations.

The Smith Cove station effects on ridership volumes of Alternative 2 vs 3 should be analyzed and evaluated as well, since the location on the Alternative 2 west side of the corridor is adjacent to more highly developed land uses. Thus, the Alternative 3 station location appears less accessible for the employees identified above in Alternative 2.

Ship Canal Crossing: We have seen very little information to date on the tunnel crossing of the ship canal in this 14th Avenue West corridor. Please identify effects of a tunnel, such as in Alternative 3 on the maritime and industrial uses in BINMIC.

3. Elements of the Environment

In the environmental review, we ask that Sound Transit address issues that arise in any of the following categories that wouldn't otherwise be an issue, were it not for the WSBLink Extension.

Transportation: Analyze and evaluate freight and worker transportation access to all port properties and facilities, port-related businesses, and impacts to freight mobility across the city, including to, from and between the two MICs. Consider road, water and rail transportation,

including rail yards, both facilities and operations. Benefits or impacts to freight mobility should be key in comparison of project alternatives. Identify how the alignments correspond with the Seattle Freight Master Plan, to evaluate effects on limited-access-, major-, and minor-truck streets and first/last mile freight connectors. Also, address safety issues and impacts with regard to alignment location, aerial structure siting, integration of various transportation modes, sight distances, and circulation liability. We have reviewed and commented on the Transportation Methodology report and supplied additional requests for information to be included or analyzed. This study must be a comprehensive traffic analysis, including travel time and other quantitative measures, and access to and from port facilities. We request review and comment of draft and final transportation reports prior to publication.

Acquisitions, Displacement and Relocations: in this attachment, or related attachments we have provided details describing potential negative effects to Fishermen's Terminal, and Terminals 5, 18—including the liquid bulk facility, 25, 102 and 104. We are concerned about property impacts, but also resultant implications for direct and related maritime businesses. Analysis should include the interdependencies of industrial and maritime businesses and the dependency on water access.

Land Use: As discussed above, please provide analysis of effects as the extensions pass through the city's two regionally- and locally-designated MICs and state-regulated shorelines, and potential to protect and improve access conditions for these industrial areas. Evaluate the land use implications in light of the essential public facilities designation in the GMA. Particularly evaluate potential for loss of essential industrial zoned area, that is, area built and committed to industrial and marine industrial use.

We would not want to see non-compatible land use changes resulting from new stations, nor would we want a poorly designed transportation system to degrade access and lead to erosion of industrial capacity and capability, including, but not limited to, the movement of over-sized vehicles. Several businesses at Terminal 7 provide this type of service to the business community at large. Their proximity to NWSA facilities is an important asset.

Analysis and evaluation must also include the potential effects of changes to zoning and land use that are incompatible with existing uses in the proximity of future light rail stations or operations. More specifically, Sound Transit should avoid incompatibilities with industrial development that could arise from siting stations in or near industrial land that may result in pressure for high density non-industrial uses, or any type of residential use in the MICs.

We note that there have been past cases of stations opened in industrial areas that are initially intended to serve the nearby industrial employment, but once they are established they lead to perennial requests for rezoning to residential uses. The SODO Link Light Rail station is one example.

The Port is particularly concerned with potential diminution of essential industrial zoned area, area built and committed to industrial and marine industrial use. These areas require enhanced industrial function, not fractured change.

Economy: The Port of Seattle is an economic development authority and the NWSA provides critical economic support to the region and the state. The project must not interfere with our ability to accomplish our public sector mission. We have significant concerns about economic effects resulting from unmitigated impacts to businesses which could also affect supporting or related businesses in the maritime, seafood, cruise or industrial economic sectors. Analysis should include the potential

for impacts on industrial lands or businesses to induce acquisitions, displacements, and relocations. Analysis must account for situations where a port terminal is anchoring a network of nearby supplier businesses. Also importantly, evaluate the cost of increased congestion due to construction activities in the public right of way. We request review and comment the opportunity for draft and final economic reports prior to publication.

Further, with regard to commerce, the review must consider the facilities that support international trade flow and the broader commerce impacts. The GMA requires that the region protect, preserve or enhance those essential public facilities and operations. Container ports' role as a critical supply chain element benefiting manufacturers and growers throughout the entire state prompted the creation of a state Growth Management Act requirement for the Comprehensive Plan Container Port Element, which in turn required the inclusion of the element within the Seattle Comprehensive Plan. This was finalized and adopted by the City of Seattle in 2012. The implications of the Container Port Element extend to the Duwamish Crossing and the SODO segments.

Social, community facilities and neighborhood: Address transportation effects on the Duwamish and BINMIC business community. This should include community bifurcation, changes in circulation patterns to and from public services and amenities, and changes to emergency service response times during construction and due to altered structures and routes following completion. In addition, the port is concerned that businesses and mobility access in areas south of the proposed alignments, particularly in Georgetown and South Park, be protected and improved by the project.

Parks and Recreation and Visual/Aesthetics: The Port operates four recreational marinas and has 23 public access sites that include scenic bike and pedestrian trails, picnic areas, habitat restoration areas, fishing piers, and shoreline access. Please coordinate with the Port of Seattle to ensure a complete analysis of the visual and/or shading impacts of the proposed alignments on these facilities.

Historic/Cultural Resources: The Port maintains many structures that are over 50 years old. Please coordinate with the Port of Seattle to ensure a complete analysis of potentially eligible structures. In addition, facilities at Fishermen's Terminal, south T-25/30, T-18, and T-5 have been constructed in filled former shoreline and shallow-water aquatic areas, used historically for non-port related marine industrial uses and activities or occupied for other purposes. Construction of rail line footings and columns has the potential to disrupt significant historical resources and requires detailed analysis and evaluation. Finally, in-water construction in multiple areas has the potential to affect Treaty fishing access, an existing condition the port is committed to maintaining and improving, in partnership with the Muckleshoot Indian Tribe and the Suquamish Tribe.

Noise/Vibration: Construction and operational noise and vibration effects, atmospheric and in-water, require detailed analysis and evaluation. Vibration affects filled upland liquefaction-prone soils. Noise effects must be evaluated, regarding commercial, office, and other occupied structures at Fishermen's Terminal and T-102.

Water resources: Please include potential for contaminated soils affecting groundwater conditions where construction impacts are expected. Additionally, the Port operates a storm water utility on Port properties: please identify storm water infrastructure and runoff effects as the link alignment passes on, over or through Port properties.

Air Quality: Please translate regional passenger and freight transportation changes during construction and upon completion into effects on air quality and greenhouse gas emissions. Effects to consider may include, but not be limited to, the potential for increased emissions from truck idling due to congestion or at at-grade crossings, temporary changes in vessel at-berth operations or while maneuvering, and potential delays in port operations and effects on cargo handling equipment idle times, etc. Please also provide expected impacts on both air quality—NO_x, DPM, VOC, CO, SO₂ Black Carbon, and greenhouse gas (GHG) emissions (CO₂) associated with the construction process and with the completed link light rail extension as compared to an agreed-upon pre-construction baseline noting all measures taken to minimize negative impacts on air quality and GHG emissions. Also evaluate the potential for decreased emissions from reduced passenger transportation.

Geology/Soils: The area is comprised of historic landfilling in shallow intertidal aquatic area sediments, with shallow ground-water conditions. The geological condition in this area is very complex and will require detailed evaluation.

Hazardous Material: Due to previous land uses and filling activities, encountering unexpected contamination along the corridor is highly likely. The corridor has the potential to cross existing State or Federal cleanup sites with existing remedies that are comprised of engineering and institutional controls in place. Construction activities, completed structures and final operation must avoid impacts to existing remedies.

Public Services, Safety and Security: Detailed analyses and evaluations are necessary for all at-grade link service, with the potential to obstruct or impede emergency services. Analysis of alternative emergency access routes is necessary. This is of particular importance for sites with commercial activities available to the public, including Fishermen's Terminal and T-102. Analyses should include changes in circulation patterns to and from public services and changes to emergency service response times. In addition, evaluation of potential link light rail effects on federally-required security conditions at port facilities is essential.

Energy Impacts and Utilities: Please ensure there is sufficient capacity in existing utilities and ensure that there is room for increased capacity to accommodate expected growth, in addition to the Link extensions' needs. Please address this concern with power capacity and any need to upgrade utilities.

Section 4f and 6f: The port has multiple parks, recreation areas, and habitat sites. Please coordinate with the Port of Seattle to ensure a complete analysis of effects on these public resources.

Environmental Justice: Scoping should include effects of not providing transit access to Duwamish Valley communities. All three alternatives do not address transit needs for these communities with limited existing transit options. None of the potential alignments reach South Park or Georgetown; while the proposed Delridge station only serves a limited portion of the north Delridge neighborhood.

Construction Impacts: Please evaluate all elements of the environment for impacts during construction, particularly as noted in this letter and our comments for relevant EIS elements, including transportation.

Cumulative Impacts: Please evaluate all elements of the environment for cumulative impacts from direct and indirect development, over time. The Port of Seattle and The NWSA make long-term

investments for public purpose and will provide to you our planned capital improvement projects from our long-range planning documents.

Conclusion

The Port and NWSA are pleased with the ongoing collaboration with Sound Transit and other key agencies and stakeholders to consider the alternatives that uphold the importance of the Port's economic development mission, and its ability to continue producing family wage jobs and uplift the quality of life in the region. We will continue to be staunch advocates to support an integrated and robust transportation system that is essential to maintaining Puget Sound's economic competitiveness.

As a peer public agency with commensurate obligations to the public we both serve, we look forward to on-going successful work with Sound Transit toward a system expansion that complements our regional economic development work and moves our region toward transportation solutions that benefit everyone.

**WEST SEATTLE AND BALLARD LINK EXTENSIONS PROJECT
COOPERATING AGENCY DESIGNATION**



Yes, the Port of Seattle wishes to be designated as a Cooperating agency for the proposed West Seattle and Ballard Link Extensions (WSBLE) Project.



No, the Port of Seattle does not wish to be designated as a Cooperating agency for the proposed WSBLE Project. However, Port of Seattle does wish to be designated as a participating agency.



No, the Port of Seattle does not wish to be designated as a Cooperating agency for the proposed WSBLE Project. Port of Seattle also does not wish to be designated as a participating agency because:



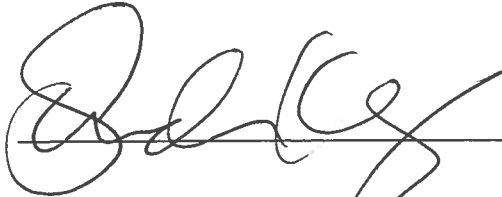
agency has no jurisdiction or authority with respect to the project



agency has no expertise or information relevant to the project



agency does not intend to submit comments on the project



(Sign – Authorized Representative)

SANDRA KILROY

(Print)

DIRECTOR, MARITIME ENVIRONMENTAL & PLANNING

(Title)

3/28/19

(Date)

Please return by ~~March 18, 2019~~ ^{4/2/19} to:

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

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

- ☒ Yes, the Northwest Seaport Alliance wishes to be designated as a participating agency for the proposed West Seattle and Ballard Link Extensions (WSBLE) project.
- ☐ No, the Northwest Seaport Alliance 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)

Dakota Chamberlain (Print)

CFDO (Title)

3/27/2019 (Date)

April 2

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



March 5, 2018

Board Chair Dave Somers
West Seattle and Ballard Link Extensions
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

VIA EMAIL: wsblink@soundtransit.org

Re: West Seattle and Ballard Link Extensions Early Scoping

Dear Board Chair Somers,

Thank you for the opportunity to provide early scoping comments to start the project development and environmental process for the West Seattle and Ballard Link Extensions. The nexus between Port of Seattle and Northwest Seaport Alliance operations and the project's representative alignment is significant, thus we look forward to being a close partner on this critical new infrastructure. Through construction and subsequent operations, this project has the potential of impacting many port facilities:

- Fishermen's Terminal
- Interbay/Magnolia cruise and fishing terminals (Terminals 90 and 91)
- Terminals 5 (adjacent to West Seattle)
- Terminal 18 (Harbor Island)
- Salmon Bay Marina (adjacent to Fishermen's Terminal)
- Old Tsubota Steel site (near Magnolia Bridge)
- Grain terminal (Terminal 86)
- Terminal 46 (near Coleman Dock)
- Terminals 30 and 25 (south of T-46 and north of Spokane St)
- Terminals 102, 104 and 106

In 1911, King County citizens created the public Port of Seattle – ensuring that harbor facilities were managed for the benefit of all citizens not just a privileged few. Today that responsibility extends from Fishermen's Terminal to Sea-Tac Airport and includes the Northwest Seaport Alliance, a marine-cargo operating partnership of the Port of Seattle and Port of Tacoma.

We are responsible for creating good jobs across the state by advancing trade and commerce, promoting manufacturing and maritime growth and stimulating economic development. To be successful in that mission, it is critical that other jurisdictions and government agencies like Sound Transit recognize the complicated nature of our operations and collaborate closely when major projects might impact our assets.

Over the past two decades, the Port has invested almost \$500 million in our region's transportation system supporting partners' projects such as Sound Transit. Our collaboration with Sound Transit included construction (and the extension) of Link Light Rail at Sea-Tac Airport. We strategized for the Sounder rail start-up and ensured the Eastside Rail Corridor remained in public ownership. Overall, we fundamentally support high capacity transit ridership to reduce transportation congestion.

As we have shared in previous letters to Sound Transit, we have three primary objectives for Sound Transit 3 projects:

1. Enhance service to Sea-Tac Airport for passengers and employees, from a web of cities throughout the region;
2. Strengthen access to Port facilities, both existing and future developments; and
3. Improve regional transportation for personal mobility, while protecting maritime and industrial land uses and freight mobility.

With respect to the West Seattle and Ballard Extensions, those second two objectives are critical. We appreciate Sound Transit's new approach to project development and broader stakeholder engagement. However, given the route of the current representative alignment, we are concerned about the possible significant impacts to the region's maritime and industrial sectors because of this project. Moving forward, we look forward to integral involvement in defining the project's preferred alignment and appreciate Sound Transit staff work to-date in that regard since the project kicked off in early January with the first meeting of the Elected Leadership Group (ELG).

As the ELG's sole representative of the Port of Seattle and Northwest Seaport Alliance, I hope that Sound Transit will appreciate the extensive process behind communicating our perspective, concerns and comments about the project. In my role as a Port Commissioner and NWSA Managing Member, I am focused on ensuring that the economic activity created by our organizations is beneficial and accessible to every community we serve. My approach to planning efforts around the West Seattle and Ballard Extensions project will be no different.

An integrated and robust transportation system is essential to maintaining Puget Sound's economic competitiveness and quality of life. We look forward to continuing our successful work with Sound Transit toward a system expansion that complements our ongoing economic development work for the region and toward new regional transportation solutions with respect to this project and other Sound Transit 3 extensions.

Please find detailed early scoping comments attached. Thank you for your consideration.

Sincerely,



Commissioner Stephanie Bowman
Port of Seattle Commission
Northwest Seaport Alliance Managing Member

Cc: Sound Transit CEO Peter Rogoff
Port of Seattle Commission
Port of Tacoma Commission
Port of Seattle Executive Director Steve Metruck
Northwest Seaport Alliance CEO John Wolfe

Thank you for the opportunity to supply these early scoping comments. We look forward to integral involvement in defining the West Seattle and Ballard Link (WSBLink) Extensions' preferred alignment, and appreciate our inclusion in both the Elected Leadership Group and the interagency team. While we believe that these extensions could significantly improve transportation in our region, there is great risk to multiple stakeholders in overlooking key issues identified in the document.

Staff contacts:

- Geri Poor, Regional Transportation Manager, poor.g@portseattle.org
- Lindsay Wolpa, Regional Government Affairs Manager, wolpa.l@portseattle.org

Our comments follow the general outline requested in your Early Scoping Information Report:

- I. Purpose & Need
- II. Representative Alignment – issues, concerns, areas of agreement
 - A. W Seattle Link Extension
 - B. Ballard Link Extension
 - C. Downtown Segment
- III. Potential alternatives
 - A. W Seattle Link Extension
 - B. Ballard Link Extension
- IV. Elements of environment

I. Purpose & Need

We generally support the Purpose and Need statement. However, we are concerned that the statement lacks recognition that the project crosses **two of the region's largest and most productive industrial zones** (Manufacturing and Industrial Centers [MICs]) and respectfully request that **that fact is explicitly acknowledged** in the official documentation of the project.

The Port of Seattle's [Century Agenda](#) and [Long-Range Plan](#) focus on this importance of close proximity to industrial lands within our goal to "Anchor the Puget Sound urban-industrial land use to prevent sprawl in less developed areas." We firmly believe that as the Link extensions pass through the MICs, planning must respect the vitality and economic contributions of the maritime and industrial sectors of our economies with a pragmatic balance. In turn, those sectors closely rely on the symbiotic land uses and transportation systems supporting freight access and mobility. Increased transit passenger mobility must be balanced with existing and future industrial capacity and capability in these centers. In this context, it is essential to note that:

- Existing freight mobility for all modes of transportation must be maintained, and the project designed in a way that does not pre-empt future extension of freight infrastructure.
- MIC employment densities are lower than those in other Centers;
- Traditional TOD approaches, which typically include housing, are inappropriate; and

Purpose

The current Purpose includes seven bullet points, which are all important. In keeping with our comments above, we suggest adding the following bullet as well:

- “Preserve and enhance the jobs and economic contributions of the Duwamish and Ballard-Interbay MICs to the region’s economy by protecting freight infrastructure and right-of-way along the corridor.”

We suggest the following underlined addition to the third bullet:

- Connect regional growth centers and manufacturing/industrial centers as described in adopted regional and local land use... plans and Sound Transit’s Regional Transit Long-Range Plan (Sound Transit, 2014).

We believe that the sixth bullet should acknowledge that station area development may be different in stations located in the Manufacturing and Industrial Centers (MICs), as traditional transit-oriented development (TOD) of high-density residential uses would not be allowed. The Port is particularly concerned with potential diminution of essential industrial zoned area, area built and committed to industrial and marine industrial use. These areas require improvement, not fractured change to non-industrial uses and activities. Please consider the following amendments:

- Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development, station access, and modal integration in a manner that is consistent with local land use ~~plans~~ policies and code requirements.

Bullets two, five and seven’s focus on “regional mobility for all” and “a healthy environment” are also critical, recognizing that the SeaTac/Airport station has carried the highest station ridership for nearly the first decade that Link has served our region. We affirm that this system expansion will expand access to and from Sea-Tac Airport for regional travelers, visitors, and employees supporting the airport area. Similarly, there are other Port of Seattle facilities in these corridors which will provide opportunities for new Link riders, as noted throughout our following comments, but especially including our cruise terminals and Fishermen’s Terminal.

Need

The current Need includes six bullet points, with the first bullet as perhaps the most significant. Similarly to the discussion under Purpose, the Need bullets should reflect that difference for station areas in the MICs. Please consider the following underlined addition to bullet five:

- Regional and local plans call for increased residential and employment density at and around many HCT stations, and increased options for multi-modal access.

Finally, we believe that Sound Transit will need to develop these extensions in a cooperative working relationship among multiple agencies with individual public missions. We will support development of the light rail extensions, while stewarding our public mission and assets and working to find the best mutually beneficial coincident outcomes with our fellow agencies.

II. Representative Alignment – issues, concerns, and areas of agreement

The Port of Seattle and Northwest Seaport Alliance support the Link Light Rail system, and the extensions to West Seattle and Ballard. We recognize the years of planning described in the Early Scoping Information Report that have helped get us to this point. We are pleased that the Alternatives Analysis is now funded, so that the project team and stakeholders can understand our issues and concerns with the Representative Alignment, many of which we have identified in prior comment letters.

We urge Sound Transit to **integrate amenities or services that would improve HCT access to Sea-Tac** and other regionally designated centers. Air passenger ridership on Link has unique characteristics including infrequent trips, carrying luggage, discomfort with the airport/Link station walk, or early/late travel times. We ask that all new vehicles **accommodate space for passenger luggage**, an important feature not well incorporated into existing lines.

By adding new connections to the regional link system, WSBLink extensions come within the greater Sound Transit 3 program, which included other region-wide programs for system access, innovation and technology. We expect that some of these funds could be used on the WSBLink extensions, at the home or business end of the airport trip, to overcome some of the barriers to transit ridership to the airport. Similarly, airport employees' shifts frequently start or end at times that Link does not currently operate. While Link Light Rail has more reliable travel times, it is a longer trip time at off-peak hours, again a detriment to air passenger ridership.

A. West Seattle Link Extension

The Port of Seattle and Northwest Seaport Alliance (NWSA) support the extension to West Seattle, albeit with significant concerns regarding our port terminals and facilities, as well as the

supporting freight infrastructure for modes, and the potential for impacts to the vibrancy of the Duwamish MIC. We have met with staff and shared Port ownership maps.

The Port and NWSA own and operate many facilities in the Duwamish, especially water-dependent uses on the shoreline. We support the representative alignment through SODO near the E-3 busway, over the Spokane St Viaduct, and paralleling the southern side of the Spokane St right of way. We endorse this location for limiting the direct impacts on the Terminals 46, 30 and 25 (T-46, T-30 and T-25) and the Port's maintenance shop at T-25 S Horton St. Access to T-25/30, T-18 (and all Harbor Island port and non-port facilities), and T-5 must be evaluated and potential negative effects avoided and minimized. Soil conditions should be given considerable review at all sites.

The aerial Link extension **must preserve and protect the major truck access** to our Terminals 5 and 18, the BNSF rail, T-104 and access to the Port of Seattle's Harbor Marine Center (T-102) on Harbor Island – east-west mobility in the Spokane Street corridor is congested and complex. As you may know, NWSA formed in 2015 to jointly operate the nation's fourth largest gateway for international containers and some maritime industrial properties of the Port of Seattle and Port of Tacoma. The light rail expansion through SODO to West Seattle and the Sounder expansion **must be cognizant of potential impacts to the nation's international trade flows**, and must protect, preserve or enhance those facilities and operations.

The port's role as an economic engine prompted the creation of a state Growth Management Act requirement for Comprehensive Plan **Container Port Element**, which in turn **required the inclusion** the concept within the Seattle Comprehensive Plan. This was finalized by the City of Seattle in 2012. See in particular Policy CP 1.6 about preserving freight access to the terminals and Policy CP 1.2 about protecting land near the port with zoning for port-related activities.

The "Terminal 5 (T-5) Wharf Rehabilitation, Bertha Deepening and Improvements Project" is projected to be **fully operational by the time** the West Seattle Link goes into construction in 2025. As a permit condition for the T-5 redevelopment, the NWSA is to install an approved Federal Rail Administration Quiet Zone (QZ) corridor between the T-5 gate and the West Duwamish rail bridge. The **foundations and columns for the proposed alignment** of the West Seattle Link bridge would need to be placed in a manner **that will preserve and protect the Quiet Zone corridor** and the at-grade crossing access to the businesses. Note that NWSA is providing more than \$5 million in funding and working with Seattle Department of Transportation (SDOT) and BNSF to establish the QZ. The QZ will eliminate uncontrolled at-grade crossings in the corridor. The main, and ultimately (by the time construction for the West Seattle Link bridge begins in 2025) the only, rail crossing providing access to the business on the east side of the railroad between T-5 and the Duwamish rail bridge will be located between Spokane St and the West Seattle Bridge.

Both rail and vehicle access to and from T-5 and T-18 **must be protected and preserved without limiting the freight movement** in the international supply chain. The BNSF rail tracks, which also run south of Spokane Street, provide critical access to Harbor Island and T-5, so avoidance of those tracks is critical for piers, footings, and any construction impacts. The alignment must not pre-empt any future freight rail capacity expansion, at the railyards and terminals, or along the Spokane Street corridor.

The Port's Harbor Marina Corporate Center (T-102) already has limited access (also on Harbor Island, south of Spokane St). SSA Marine (T-18's marine terminal operator), maintains offices at T-102 that provide critical support for their operations on the other end of Harbor Island. Also, the Port's T-104 lies between East Marginal Way and the East Waterway, west of the East Marginal Way Grade Separation. Further design work will also **require close coordination** with us regarding facilities access, impacts of construction, aerial guideway column placement and light rail operations.

For the Link bridge over the commercial waterway:

- Air draft should be **at least as high** as the West Seattle Freeway;
- Column spacing within the waterway should be **at least 200' and in alignment** with the existing navigation path beneath the Swing Bridge and the BNSF trestle.

During construction, the Duwamish waterway **must not be restricted** from navigation of barges up to 105' beam by 420' length, and air draft currently available.

In SODO, our understanding is that this alignment does not use public street rights of way, such as 1st or 4th Avenues S. Beneficially, this means no direct capacity loss in the SODO public rights of way, yet we need to understand if existing buses on the busway would be displaced to city streets. The arterials in SODO are already constrained and certainly congested during peak commute hours; further traffic volumes risk interfering with freight mobility in this over-burdened section of the Duwamish MIC. Impacts to avoid or mitigate include: loss of lanes, loss of turning or freight parking/loading capacity due to dedicated transit-ways or aerial guideway columns; construction activity of guideway or stations' and increased at-grade rail crossings in industrial areas. In summary, project planning and development must focus on limiting and/or mitigating any impacts to freight access and mobility.

B. Ballard Link Extension:

The Port of Seattle supports the extension to Ballard, again with significant concerns regarding our port terminals and facilities and potential for impacts to the vibrancy of the Ballard-Interbay Northend Manufacturing/Industrial Center (BINMIC). The Ballard Link Extension corridor is in the center of the 615-acre BINMIC, anchored by Fishermen's Terminal and Terminal 91, both essential water-dependent marine industrial assets, with related effects on other adjacent industrial uses and activities. Here also, we have met with Sound Transit staff and shared Port

ownership maps. As with the West Seattle extensions, all sites must receive considerable review of soil conditions.

BINMIC is headquarters to industrial, maritime and fishing, and manufacturing activities. The light rail expansion to the northwest to Ballard **must be sited with regard to the maritime and BINMIC operations**. Many vessels from the North Pacific fishing fleet homeport at facilities on the Lake Washington Ship Canal, Salmon Bay, and Terminal 91 (T-91), especially including Fishermen's Terminal. **Fishermen's Terminal** is critical to Seattle's maritime economy (please see further information below). **Terminal 91** is our 200-acre facility which serves multiple customers, which is the homeport for the commercial fishing fleet, and **Smith Cove Cruise Terminal** our two berth facility. Along with the Bell St Pier Cruise Terminal, these berths have led to recent growth in Seattle's tourism industry, driven by the burgeoning cruise ship industry.

The Port also operates **recreational marinas**, the Maritime Industrial Center, and recently agreed to acquire the **Salmon Bay Marina**, 2100 West Commodore Way (*final possession later in 2018*). Additionally, T-91 includes significant acreage for which the Port has considered redevelopment options, and is currently considering **industrial and/or commercial redevelopment**. The **Maritime Industrial Center**, at 2700 W Commodore Way, offers short-term and daily moorage for vessels up to 250' in length, concrete dock space for loading and repair/maintenance work, short-term gear storage and staging, and office and shop space. The economic impact of Port of Seattle Related Fishing at T-91, Fishermen's Terminal and the Maritime Industrial Center is 16,000 direct/indirect jobs, \$1.3 billion annual payroll, \$1 billion annual business revenue, and 120 million annual local taxes (p. 34, Endnote 1).

If the proposed alignment remains elevated, the Link bridge over the Lake Washington Ship Canal, air draft **should be at least as high** as the Aurora Bridge. Column spacing within the waterway should be at least 200' and in alignment with the existing navigation path beneath the Ballard Bridge. During construction, the Ship Canal should not be restricted from navigation of vessels up to 78' beam by 400' length, and air draft currently available under the Aurora Bridge. We advocate that a Ship Canal crossing should be a fixed structure, not a bascule or other "opening" span, so that marine traffic and light rail are completely independent of one another.

Specifically, we have documented many times, in many comment letters, our concerns over the impacts of the representative alignment on the west side of the Ballard Bridge. Fishermen's Terminal is the vibrant home of the North Pacific Fishing Fleet. It is a living landmark, as well as an active industrial site that is home to the core of the current and evolving fishing industry. Fishermen's Terminal (established in 1919), is the largest single-built, committed fishing industry support site in King County encompassing 76 acres. Fishermen's Terminal offers a full complement of services for commercial fishing and workboats. Additionally, there is year-round and seasonal freshwater recreational moorage. Landside businesses at Fishermen's Terminal include a wide range of businesses, from support services for fishing and commercial maritime activities, to retailers, restaurants and offices. We recently completed a strategic plan for

Fishermen's Terminal which calls for expanding the on-site roster of suppliers that serve the fishing fleets. Private sector actors in the fishing cluster are bullish as well. Note that the 2016 report "Modernization of the North Pacific Fishing Fleet Economic Opportunity Analysis" (Endnote 2) probes an emerging trend for new-build fishing vessels in Washington State shipyards.

On Fishermen's Terminal (FT), along the eastern-most side, Fishing Vessel Owners (FVO) and their two marine ways are situated directly west of the bridge. FVO operation is profoundly vital to the local maritime industry: **losing the operation would have significant domino impacts to other marine and fishing related businesses**. FVO is one of the Port of Seattle's oldest tenants, providing services from their current location since 1919. The two FVO rail systems (300-ton and 500-ton) haul approximately 50 vessels per year for repair on land and FVO works on about 50 vessels per year in the water. If the columns for the light rail aerial structure touch down on the areas leased to FVO, the impacts to the piers, above ground and in water rails, landside structures and operations would be very significant. Studied during the monorail studies in 2003-5, relocation of their service and function was found to be infeasible. This likely would result in FVO moving their operation out of Seattle or closing all together, and the loss of about 30 family wage union jobs and Port revenue, as well as impacts to vendors and subcontractor jobs. Having the convenience of a trusted shipyard is a large factor in many of the vessels staying at FT and paying higher rents. Another trickle-down effect would be lower occupancy on the docks and fewer people supporting the upland businesses at FT.

We have **grave concerns that piers and footings** of a new bridge would create new navigational constraints in the area west of the Ballard Bridge, where access, turning and maneuvering for larger vessels, especially the fishing fleet needs to be taken into consideration (both in the final design and during construction). Other impacts to Fishermen's Terminal would potentially be reduced storage and laydown space, reduced parking, and reduced moorage slips.

While we will propose alternative alignments in the next section, we support the representative alignment being aerial, rather than at-grade, in the Elliott/15th Ave W corridor: this is already a congested city arterial which also serves as the freight spine through Seattle, connecting the two MICs and also the major access route to the Pier 91 cruise terminal.

Planning must focus on minimizing loss of capacity on the freight spine. Impacts to avoid or mitigate include: loss of lanes, loss of turning or freight parking/loading capacity due to dedicated transit-ways or aerial guideway columns; construction activity of guideway or stations, and increased at-grade rail crossings in industrial areas. The Elliott/15th Ave W corridor has no proximate parallel routes that could accommodate vehicles or truck-turn maneuvering both in final operations and during construction and so such functions must be incorporated into the corridor design. In summary, project planning and development must focus on limiting and/or mitigating any impacts on freight access and mobility, and other users in the corridor such as the

cruise industry. For this reason, we recommend consideration of alternatives to the representative alignment in the next section.

Station location: We look forward to further station area analysis for the Smith Cove stop, to consider how best to capture the T-91 employees (fishing, industrial and cruise) and cruise terminal passengers. We support the stops providing access to Seattle Center, especially for the redevelopment at Key Arena.

C. Downtown Segment

We support the 5th Avenue tunnel, over other alternatives considered such as an at grade alignment in 1st Avenue. A chief issue of a 1st Avenue alignment is the potential loss of vehicle capacity through downtown, as well as farther south in SODO and the Duwamish.

III. Potential alternative alignments

The Port and NWSA believes that there is significant work to do on alternative alignments. The public and a wide range of stakeholders need a better understanding of benefits and constraints in order to be able to make trade off decisions. Please address the following in your analysis of alternatives, in keeping with our more detailed comments above.

A. West Seattle Link Extension

- 1) Southerly single river crossing of Duwamish farther south than Spokane St Corridor (Idaho/Genesee): The Port would support such an analysis to remove impacts from the highly subscribed Spokane St Corridor which currently carries multiple levels of automobile traffic, active rail lines, and river traffic. Light rail in this alternative must be situated carefully to minimize impacts to Port terminals south of the Spokane St Corridor: T-102, T-103, 104, 106, and 115. T-105 and T-107 are public open space and shoreline access sites.
- 2) Negative effects are unacceptable for an alignment north of the Spokane St Bridge, especially if unable to accommodate access needs to T-5, T-18 and other Harbor Island businesses.
- 3) The rail corridor along the Spokane Street corridor was designed with the potential for an additional rail track. That right-of-way must be protected, as well as the rail yards.
- 4) Any crossing of the West Duwamish Waterway must be designed to not impede commercial traffic on the waterway.
- 5) During construction, it will be important to maintain freight mobility and access to our terminals, as well as other freight trip generators, for all modes of transportation.

B. Ballard Link Extension

As mentioned above in comments regarding the preferred alignment, Elliott/15th Ave W is already a congested city arterial, the spine for freight travel through Seattle, and the primary route to the Smith Cove Cruise Terminal and industrial land at T-91. Fishermen's Terminal, one of the Port's oldest active facilities, stands to lose a significant tenant under the representative alignment

(reference significant details above on FT). Seattle's cruise homeport serves over one million annual passengers, and Smith Cove Cruise Terminal has 2 of Seattle's 3 berths. Good access to the public transit system for maritime and industrial employees and cruise passengers reaps benefits.

We endorse further study of alternative designs to resolve these issues, and suggest the following:

- 1) **Tunnel under Ship Canal as in Alignment C-01(c)**: We believe that a tunnel under the Lake Washington Ship Canal (Ship Canal) will contribute to system reliability at a scale to justify that investment. It will also eliminate conflicts with the Port's Fishermen's Terminal that were well documented and never resolved in high capacity planning proposals including the monorail project. (Please reference FT information on page 6 of this letter). The Representative Alignment considered for a new Ship Canal Bridge is west of the existing Ballard Bridge, which would likely require acquisition and relocation of the Fishing Vessel Owners (FVO) facility, an active operation providing unique capabilities to the maritime industry. Additionally, this would relieve new navigational constraints in the area west of the Ballard Bridge due to piers of a new bridge, for access, turning and maneuvering for larger vessels. We need detailed design and construction evaluations of these alternatives.

However, in pursuing such a tunnel, we have a concern related to our new property, Salmon Bay Marina. Sound Transit staff has noted that a vertical tunnel access shaft would be part of tunnel construction and that this marina is being considered for the site of the shaft. The property currently contains City, state and federal approvals for improving the site, and the Port is beginning plans for upland improvements. This could also be impacted by the vertical tunnel access. Again, this is prime waterfront industrial land, and we urge Sound Transit to explore alternative locations. However, our significant concerns can only be clarified with detailed design and construction evaluations.

The entire BINMIC and ship canal area will be impacted by this decision and would be adversely affected by poor planning and design. We anticipate that study of a tunnel under the ship canal may relieve impacts on the maritime industry and family-wage jobs dependent on the ship canal location.

- 2) **Tunnel under ship canal closer to 15th**: While a tunnel was proposed farther west in the studies for the ST3 System Plan, we would also request study of a tunnel under the ship canal at 15th Ave W, to improve system reliability (compared to a ship canal bridge) and reduce impacts on the BINMIC and Fishermen's Terminal.
- 3) **Tunnel under Elliott**: Traffic is already very congested in the Elliott/15th Corridor. Construction and support columns for the aerial alignment would only exacerbate the poor traffic in the area and restrict traffic movement. It would be very difficult to mitigate these impacts by acquiring properties and add lanes(s) to improve traffic flow. An underground option is very expensive but construction, long-term environmental, and traffic impacts must be carefully assessed. Having

this segment of the Ballard extension underground would offer an opportunity for a shorter or straighter alignment between the Seattle Center and Smith Cove stations.

4) Adjacent to Balmer Yard

a) **West side: C-01c – Aerial via Interbay West**

This alternative would better serve new development, jobs and economic activity in the Interbay sector of BINMIC. The opportunities for ridership from the new Expedia campus, cruise ship terminal, fishing and industry no T-91, and potential new development of T-91 uplands make this segment critical for partnerships in transportation improvements.

Further design work would require close coordination with Port of Seattle regarding our facilities, access and impacts of construction, and light rail design. It is important to protect the numerous industrial operations at T-91, as well as the integrity of operations throughout T-91 and in the light industrial buildings adjacent to the tracks. Similarly, impacts to the regional bike path connecting NW Seattle to downtown must be identified and mitigated. Planning is underway for redevelopment of the northern lands of T-91 and that access should be considered as part of Sound Transit's studies.

b) **East of Balmer Yard: C-01c – aerial via Interbay East**

We also request that Sound Transit consider alternate routing for C-01c that follows the east edge rather than the west edge of the BNSF Balmer railyard. Proceeding south from the Ship Canal tunnel, the rail would tunnel south under the BNSF Balmer Yard to the easterly side and proceed south to connect with the current proposal. In favor of this alignment proposal is the opportunity to access the properties east of Balmer, and the lack of abutting residential lots as compared with the 20th Ave W segment north of Thorndyke Ave W. Issues with the C-01c alignment in the west edge of the Balmer yard are the critical access road for the 120-acre T-91 Port property and the regional bike path. As such, the light rail design would have to preserve access to the numerous light industrial operations currently in this section of T-91, and address the bicycle path.

Overall, as you evaluate these alternatives, please determine impacts to Port-owned property at 1617 – 15th Ave W (known as the former Tsubota Steel site). The property is irregular in shape and the most logical redevelopment scenario would be focused on the south edge where Route Option C-01c was proposed. Acquisition of a portion of this property would affect the value and could render the entire property unviable for redevelopment.

- 5) Please work with us to consider how **the Smith Cove station** could better serve the fishing and industry employees at T-91 and especially **the hundreds of thousands of cruise passengers** and employees at Smith Cove Cruise Terminal. This could also include an opportunity for a Transportation Hub in the Smith Cove area which could provide opportunities to connect passengers from Sounder train service and Link Light Rail.

- 6) **East side of Ballard Bridge**: While we firmly believe we must protect existing maritime and industrial business, a thorough study would also review a Ship Canal Crossing on the East side of the Ballard Bridge.

IV. Elements of the Environment

Transportation: Please consider transportation access to all Port properties and facilities, port-related businesses, and impacts to freight mobility across the city, including to, from and between the two MICs. Consider road, water and rail transportation, including rail yards. The benefits or impacts to freight mobility should be key comparison of project alternatives. Please identify how **exactly the alignments correspond with the Seattle Freight Master Plan**. This plan was created over several years with significant input from the Port and other relevant stakeholders. Its implementation is barely underway.

Acquisitions, Displacements and Relocations: We have provided many details about the potential impacts to Fishermen's Terminal and specifically the critical FVO shipyard uses and activities at the eastern end of the site. We are concerned about property impacts, but also resultant implications for direct and related Fishermen's Terminal businesses. Analysis should include the interdependency of industrial businesses and the dependency of industrial businesses on a working waterfront.

Land Use: As discussed in our Section I comments on the Purpose and Need, please provide analysis of impacts as the extensions pass through the city's two MICs, and potential to protect and improve access conditions for these industrial areas. The Port is particularly concerned with loss of essential industrial zoned area, that is, area built and committed to industrial and marine industrial use. We would not want to see non-compatible land use changes resulting from new high capacity transit stations, nor would we want a poorly designed transportation system to degrade access and lead to erosion of industrial capacity and capability, most noteworthy being heavy transportation access. Impacts could include gentrification or potential to attract land uses that are incompatible with existing zoning for industrial uses. More specifically, Sound Transit should avoid incompatibilities with industrial development that could arise from siting stations adjacent to industrial zoned land that may result in pressure for high density non-industrial development, or any type of residential use in the MICs. The Port is particularly concerned with potential diminution of essential industrial zoned area, area built and committed to industrial and marine industrial use. These areas require improvement, not fractured change to non-industrial uses and activities. Please consider the following

Economy: We have significant concerns about economic impact resulting from unmitigated impacts to businesses which could also affect supporting or related businesses in the maritime, fishing, cruise or industrial economic sectors. Analysis should include the potential for impacts on industrial lands or businesses to induce acquisitions, displacements, and relocations on interdependent businesses and land.

Social, community facilities and neighborhoods: address transportation effects on Duwamish and BINMIC business community.

Visual/Aesthetics: Please address aerial structure in existing traffic corridor, visual leading to fundamental safety and circulation liability.

Noise/Vibration: Please address construction and operational effects as well.

Water resources: Please include potential for contaminated soils affecting groundwater conditions.

Air Quality: Please translate freight transportation changes into impacts to air quality, such as potential emissions impacts of increased truck idling from increased congestion throughout the system or at-grade crossings.

Geology/Soils: As acknowledged earlier in our comments, the area is comprised of landfill in historic shallow intertidal aquatic area sediments, with shallow ground-water conditions. It is very complex and will require detailed evaluations.

Hazardous Material: Due to previous industrial land uses, contamination along the corridor is highly likely.

Public Services, safety and security: Please address where at grade Link service might interfere with emergency access. Also how would Link light rail potential impact secured Port facilities?

Energy Impacts and Utilities: Please ensure there is sufficient capacity in existing utilities, and ensure that there is room for increased capacity to accommodate expected growth in addition to the Link Extension's needs. Please address this concern with power capacity and the need to upgrade infrastructure.

Parks and Recreational Resources/Section 4f & section 6f: The Port operates several recreational marinas, and 42 public access points. Many of these are located along the Duwamish River and should be acknowledged if there would be Link impacts.

Environmental Justice: Please evaluate environmental and social justice impacts to industrial jobs.

Construction Impacts: Please evaluate all elements of the environment for impacts during construction, particularly as noted here.

Cumulative Impacts: Please evaluate all elements of the environment for cumulative impacts from direct and indirect development.

In summary, the Port believes that improved regional transportation for personal mobility, freight mobility and maritime/industrial land protections can and must co-exist in order to maintain Puget Sound's economic competitiveness and quality of life. We look forward to partnering with you to expand the Link Light Rail to Ballard and West Seattle.

Endnotes:

1. https://www.portseattle.org/Supporting-Our-Community/Economic-Development/Documents/2014_economic_impact_report_martin.pdf
2. https://www.portseattle.org/Supporting-Our-Community/Economic-Development/Documents/Fleet%20Modernization%20Final%2011_11.pdf



September 27, 2018

Honorable Joe McDermott
ST3 Elected Leadership Group Co-Chair
King County Council Chair
516 Third Ave, Room 1200
Seattle, WA 98104

Honorable Mike O'Brien
ST3 Elected Leadership Group Co-Chair
Seattle Councilmember
600 Fourth Avenue, 2nd Floor
Seattle, WA 98104

Delivered via email

Re: West Seattle and Ballard Link Extensions Level 2 Screen Recommendations

Dear Co-Chairs McDermott and O'Brien,

On behalf of the Port of Seattle (Port) and Northwest Seaport Alliance (NWSA), we write to urge the Elected Leadership Group to incorporate the following comments into your recommendations moving into Level 3. We have strong concerns about certain Level 2 routes and the implications of construction activities. The maritime industry relies on a broad ecosystem of support businesses and supply chain links, hence no one business impact can be considered in isolation. Critical maritime and industrial activities within the Duwamish and Ballard industrial areas must be a core consideration.

As detailed below, some of the potential routes and associated construction activities could affect a wide range of cargo, fishing and other industrial operations, hamper freight movement and ultimately result in a loss of jobs in our community. These businesses are vital to the economic vitality of the region and state.

We fully support Sound Transit's objectives of promoting mobility in our region. Expanding transit opportunities is more important than ever before as Seattle and our region continue to grow. We believe Sound Transit will find a preferred alternative that will move people more efficiently, and with less environmental impact, while also maintaining our economic competitiveness and quality of life.

We appreciate the opportunity that Sound Transit provided for the impacted communities to participate in this process through the Stakeholder Advisory Group (SAG). As a public agency we value their input and work to prioritize the inputs of our constituents. Following on the September 26th SAG meeting, we were pleased to see many of our perspectives reflected in their recommendations. As the ELG proceeds, we ask that our comments be folded in with considerations of the SAG perspectives.

A summary of our comments on the alternatives process to-date is included below, with a more detailed explanation from our staff as an attachment to this letter.

West Seattle and SODO Segments

- Any Spokane Street Corridor alignments, especially going north of the West Seattle Bridge, will pose significant economic, operational and environmental impacts to Port and NWSA facilities. Proposed alignments must ensure those facilities remain fully operational during and after construction, while ensuring access for trucks and rail serving those facilities.

- With respect to the Duwamish crossing, please evaluate an alignment slightly farther south of the representative alignment (far southern tip of Harbor Island) to determine if there are ways to further reduce impacts to existing businesses.
- The SODO alignment on Occidental Avenue should be eliminated because transportation and land use implications. Traffic and freight mobility impacts would exacerbate current congestion and may not be able to be mitigated. In addition, adding a station west of the BNSF mainline could threaten our region's limited resource of industrial lands and displace many of those industrial and maritime businesses. We believe the SAG's recommendation to carry this forward does not accurately reflect the complicated impacts that this alignment would impose.

Interbay/Ballard Segment

- No aerial alignments through Fishermen's Terminal should be considered further because of impacts to terminal operations and repercussions of the fishing industry.
- The 20th Avenue W alignments should be eliminated due to costs, construction issues and impacts.
- Moveable bridges across the ship canal should be eliminated as alternatives as they will not work for transit and could impede maritime mobility.

The Port and NWSA are pleased with the ongoing collaboration with Sound Transit and other key agencies and stakeholders to consider the many alternatives that do not harm the maritime industrial base in Seattle.

Further, we urge the planning and design of the extensions support improved connectivity of the light-rail system to Seattle-Tacoma International Airport. We must all work together to encourage more transit use for passengers and employees of the airport, one of the fastest-growing in the nation.

We look forward to continuing our successful work with Sound Transit toward a system expansion that complements our economic development work for the region and provides new regional transportation solutions for everyone.

Thank you for your consideration and please do not hesitate to contact either one of us.

Sincerely,



Stephen P. Metruck
Executive Director, Port of Seattle



John Wolfe
Chief Executive Officer, Northwest Seaport Alliance

Attached: Detailed Comments

Cc: Elected Leadership Group members, Sound Transit CEO Peter Rogoff, Port of Seattle Commission, Port of Tacoma Commission, Stakeholder Advisory Group members

Detailed Comments regarding Level 2 Screening

West Seattle and SODO Segments

Should the ELG consider carrying forward the alignment north of the West Seattle bridge, against the recommendations of the SAG, the Port and NWSA remain exceedingly concerned that the construction impacts of the West Seattle alternative that crosses the Duwamish River north of the West Seattle Bridge have not been adequately identified. We do not know how harmful the construction impacts would be and whether they could be mitigated. These routes have the potential to create significant negative impacts on cargo and supporting water-dependent logistics functions and result in negative economic impacts across a broad spectrum of maritime industries, which, in turn, stand to materially impact traffic flows for transit and private vehicles. The yet-to-be-determined impacts during the estimated five-year construction period could have long-term impacts on international container cargo operations and significantly impede truck and other traffic in the already congested Spokane Street corridor.

The trucks gates for the NWSA Terminal 18 (T-18) and Terminal 5 (T-5), as well as Westway Feed Products, are accessed via S Spokane Street via I-5/I-90, SR99, W Marginal Way SW, and E Marginal Way S. T-18 is the busiest freight terminal in the region, and S. Spokane Street is the primary route for trucks getting to and from this terminal. It provides access between the container terminal and the railyards (located off E Marginal Way S) as well as access to and from Interstates 5 and 90. Further consideration of an alignment north of the West Seattle Bridge must address the feasibility of committing to points such as the following during construction:

- Good access to the NWSA container terminals and cargo support businesses must be maintained throughout construction for trucks and rail.
- ST will be responsible to mitigate all potential impacts with the subject tenants (and NWSA/POS).
- Temporary business disruptions must be minimized, and business displacement mitigated.
- Traffic flows along the S Spokane Street corridor between W Marginal Way SW and I-5/I-90, will require enforced limitations on construction traffic during commuter and freight peak hours on week days. Unlimited hauling may be possible at night and non-event weekends.
- Construction activities along S Spokane Street that disrupt terminal access must provide alternative access that fully accommodates the same volume and types of traffic, and address other impacts, including:
 - Access/egress and queueing for trucks, trains, emergency vehicles, employees/labor and vendor deliveries
 - Truck parking availability
 - Terminal security fencing restored
- Construction staging/laydown areas should be placed outside the terminal operations areas.
- Construction haul routes should be selected to minimize disruption to freight routes
- Maintain traffic signalization and signage along Spokane Corridor to facilitate freight movement
- Maintain north/south cross streets
- Existing land under elevated structures should remain available for terminal facilities and operations post construction
- No negative post construction impacts to operations will follow delivery of the project.
- The Special Provisions for the project must include agency coordination requirements designed to provide Port and NWSA with the opportunity provide input into construction traffic control plans and other

construction planning efforts with the potential to affect operations and access/egress. We envision regular meetings.

Terminal 5 must also be considered in addition to the possible impacts to T-18. We expect that T-5 will again be operational during Sound Transit's targeted construction window for the West Seattle segment. We hope to be announcing a new tenant by the end of this year and start our own construction for the facility's modernization in 2019 with a target opening by 2023. We anticipate that T-5 will have similar needs as T-18.

Beyond construction, placement of light rail north of the West Seattle Bridge could also cause a negative ripple effect to other Harbor Island logistics and support businesses. While the Duwamish crossing options just south of the West Seattle Bridge would also prove challenging during construction, the potential impact on international cargo operations would be less significant. To that end, we strongly encourage Sound Transit to explore an additional Duwamish crossing on the southern tip of Harbor Island, avoiding the critical BNSF tracks and SSA Marine's headquarters.

Terminal 25 South (T-25S), another Port/NWSA property impacted by a North alignment, is uniquely situated for habitat on the East Waterway. The Port has planned large-scale habitat restoration for this site. As our plans progress to environmental review and permitting actions, construction and operating effects will become more evident.

As we pointed out in our early scoping comment letter, exploration of light rail alternative alignments must consider the facilities that support international and domestic trade flow and broader commerce. The Growth Management Act requires that the region protect, preserve and enhance those Essential Public Facilities and the freight corridors that support them. Container ports' role as an economic engine prompted the creation of a state Growth Management Act (GMA) requirement for the Comprehensive Plan Container Port Element. This was finalized and adopted by the City of Seattle in 2012.

Through SODO, the routing decision must also be cognizant of potential impacts to the nation's trade flows. We believe that the newest "Occidental" option proposed through the SODO area should no longer be considered. One key factor is the likely significant impacts to the SODO transportation system – more specifically, the expected traffic impacts from a station at Occidental and Lander. In addition, the expected significant costs and challenges of a grade separation across a wide span of the BNSF railway is not merited. The GMA requirements and the Container Port Element also apply to the SODO segment. However, we see the need for better transit service for workers on the west side of the BNSF mainline. Moving forward, we hope that Sound Transit will more formally coordinate with Metro Transit to find solutions for improved service for those workers.

Interbay/Ballard Segment

Moving to another key sector of the maritime industry, Fishermen's Terminal is the vibrant home of the North Pacific Fishing Fleet. It is a living landmark, as well as an active industrial site that is home to the core of the current and evolving fishing industry. The terminal offers a full complement of services for commercial fishing and workboats. Additionally, there is year-round and seasonal freshwater recreational moorage. Landside

businesses include a wide range of support services for fishing and commercial maritime activities, retailers, restaurants and offices.

We believe that any elevated alternatives crossing Fishermen's Terminal along the 15th Avenue corridor should no longer be considered, including the moveable bridge, a component of the "representative alignment." The Port has documented many times, in many comment letters, concerns over the impacts to this critical facility at the heart of our \$2 billion regional fishing industry. Through the ELG Level 2 recommendations, we hope that you will do the right thing to protect such an important part of the region's maritime cluster.

We were pleased to hear the SAG acknowledge the impacts of alignments going through Fishermen's Terminal. We support their recommendations to remove the aerial alignments. On Fishermen's Terminal's eastern-most side, Fishing Vessel Owners (FVO) and their two marine ways are situated directly west of the bridge. FVO operation is a profoundly vital shipyard for the local maritime industry: losing the operation would have significant domino impacts on other marine and fishing related businesses. FVO's two marine ways allow boats to be pulled out the water for dry land work, in addition to heavy industrial work of welding, machining, painting and woodworking in FVO's several buildings. The long-tenured FVO staff is deeply experienced and are additionally called off-site to support other Seattle shipyards for special expertise.

FVO is one of the Port of Seattle's oldest tenants, providing services from their current location since 1919. An elevated alignment through Fishermen's Terminal would force FVO to move their operation out of Seattle or close all together and result in the loss of family wage union jobs and Port revenue, as well as impacts to vendors and subcontractor jobs. The convenience of this trusted shipyard is a primary factor in many of the vessels staying at Fishermen's Terminal.

The Port is grateful that Sound Transit's shifted the alignment away from FVO's in-water rail (marine ways). However, we continue to have grave concerns that construction and operations of the link extension with piers and footings of a new bridge will create significant navigational constraints and challenges in access, turning and maneuvering for larger vessels, especially the fishing fleet.

In addition, we appreciate exploration of a 15th Avenue-aligned Tunnel under Fishermen's Terminal. Initial technical conversations between Sound Transit and our staff indicated that threats to FVO still exist due to a needed ventilation shaft. If the ELG chooses to carry forward the Central Interbay / Tunnel / 15th, the potential impact to FVO must be mitigated through additional design in Level 3.

Moving to the far westerly alternatives, "20th/Tunnel/15th" and "20th/Fixed Bridge/15th" alternatives, we support the SAG recommendation and believe those options should no longer be considered into Level 3. Between the impacts to Terminal 91 operations, Salmon Bay Marina and the early projected significant costs of these routes, we expect that other alternatives will provide better opportunities for all stakeholders.

Terminal 91 is home to the Smith Cover Cruise Terminal and the North Pacific Factory Catcher Processor Fishing Fleet. Several on terminal businesses are key to supporting this vital fleet. For these businesses to be successful they require easy on terminal and off terminal movement of trucks and freight. We have concerns that on terminal construction and proposed placement of columns will adversely impact the ability of these businesses

to remain efficient and effective in their support of these vessels and movement of frozen product. It is critical that frozen fish product be able to move by rail and truck in a timely manner from the terminal to its destination. Additionally, Terminal 91 is home to two expanding-cruise-ship berths. Construction laydown and activities near the east gate of the terminal could easily create negative traffic impacts to the 15th/Elliott corridor as cruise passengers are delayed entering or exiting the terminal.

The “Smith Cove” station, near east gate entrance into Terminal 91 (and future Expedia headquarters), bears critical significance for the Port. While we need further details to provide feedback for a preferred station location, our key criteria include:

- Routing opportunities for shuttles serving cruise passengers,
- Employee access to Terminals 91 and 86,
- Traffic flows on 15th and Elliot Avenues West (including transit hub access), and
- Impacts to freight mobility through the corridor and into our facilities.

More broadly around Interbay/Ballard segment, as the SAG recommended, we agree that none of the moveable bridge options should be further considered. The negative impacts to the navigable waterway below and the transit system would be equally detrimental to the public and maritime sector. It should be noted that a broad swath of stakeholders continues to express similar concerns and there has been minimal support for these options.

For the remaining alternatives in the 14th Avenue West corridor and the Ballard terminus, there have been proposals for the alignment to swing west to provide a Ballard station west of 15th Avenue West. As SAG advised, we support the further study of that possibility, including for the 14th Avenue West alignment.

Finally, construction concerns and required mitigation identified in the West Seattle/SODO segments discussion above must also be considered with respect to any alignments through this segment.



King County

Department of Natural Resources and Parks
Director's Office
King Street Center
201 South Jackson St., Suite 700
Seattle, WA 98104-3855

March 29, 2019

Lauren Swift
Senior Environmental Planner
Sound Transit
401 S. Jackson Street
Seattle, WA 98104-2826

Subject: Response to West Seattle and Ballard Link Extensions Project Scoping

Dear Ms. Swift:

King County Department of Natural Resources and Parks (DNRP) appreciates the opportunity to provide input through the scoping process for the Environmental Impact Statement (EIS) being prepared for the West Seattle and Ballard Link Extensions Project. Of particular concern to DNRP are potential impacts to King County Wastewater Treatment Division (WTD) facilities, proposed King County Regional Trails connections, King County Solid Waste Division (SWD) property on Harbor Island, and Superfund cleanups in the Lower Duwamish Waterway and East Waterway.

Existing WTD facilities of potential concern in proximity to the proposed alignments, identified on the enclosed maps, include the following:

- Mercer Street Tunnel
- Lake Union Tunnel
- Interbay Pump Station (Interbay)
- Elliot Bay Interceptor, Sections 3 through 8
- The North Interceptor
- The Ballard Trunk
- West Duwamish Interceptor
- Delridge Trunk
- Hanford Trunk
- Renton Effluent Transfer System, Sections 8 and 9
- Lander Trunk
- West Seattle Force Main
- East Duwamish Waterway Crossing

DNRP recommends that the EIS include an evaluation of the impacts of the proposed project on these facilities. In addition, WTD is planning a major combined sewer overflow (CSO) treatment facility somewhere in the vicinity of the Lower Duwamish crossing. Close coordination with WTD will be needed to ensure that both projects do not adversely affect each other or inadvertently limit available options.

The preferred alignment would have the most significant impact on Interbay. Interbay pumps wastewater to the West Point Treatment Plant (West Point) for treatment and discharge, serving an area covering approximately 42 square miles within the City of Seattle. Interbay is a critical facility in King County's regional wastewater conveyance and treatment system, pumping up to 133 million gallons per day to prevent CSOs along Seattle's waterfront and the Lower Duwamish. The facility is also key to protecting water quality in Puget Sound.

Interbay receives flow from the Elliott Bay Interceptor and the South Magnolia Trunk, and pumps the flow through two pressure force mains to where it is discharged into gravity pipelines that convey the flow to West Point. The facility consists of pumping and associated electrical equipment, pressure force mains, odor control equipment, and standby power facilities. Sound Transit's proposed alignment impacts the future operation of Interbay, and may require full facility relocation along with associated influent and effluent piping and utilities. Therefore, the feasibility of facility relocation would need to be fully evaluated, along with any operational impacts that may result from relocation.

The Superfund cleanups in the Lower Duwamish and East waterways include extensive in-water work. The selected route will need to cross at least one, and possibly both, of these areas. Close coordination during siting and construction will be needed to ensure that effects on these cleanups and work on adjacent uplands—including any potential to release contaminants into these waterways—are minimized.

In addition, upland areas adjacent to the Duwamish Waterway corridor (including both the East and West waterways) are extremely limited in availability and of high enough value for habitat restoration. Efforts should be taken to minimize footprint in this area that could reduce or preclude potential habitat restoration areas that are required to meet Natural Resource Damage Act claims. The impacts of stormwater runoff from rail operations should also be considered for Duwamish Waterway and Lake Washington Ship Canal crossings as related to sediment cleanups that are underway or could be considered in the future.

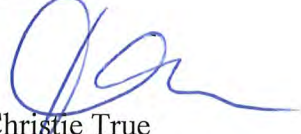
Further, DNRP recommends that Sound Transit explore opportunities to link the proposed stations included in this project with the non-motorized transportation network surrounding each of the stations. Linking these stations with nearby regional trails, such as the Burke-Gilman Trail or the Neighborhood Greenway network, will help maximize overall ridership at each station and reduce traffic congestion on the surrounding street network. Sound Transit should also engage project stakeholders early on to begin programming the non-motorized access funding included in each project to ensure that any identified access improvements are completed by the time each station opens.

Lauren Swift
March 29, 2019
Page 3

Lastly, the proposed alignment of the West Seattle LINK Extension is adjacent to property owned by SWD on Harbor Island. Any proposal to use this property to stage construction equipment and materials would need to be closely coordinated with SWD to minimize disruption to tenants currently occupying the property.

DNRP looks forward to the opportunity to continue working with Sound Transit during future environmental review and would like to formally accept Sound Transit's invitation to participate in the environmental review process as a cooperating agency. The Agency Designation form is attached for your convenience. If you have any questions related to existing wastewater facilities, please contact Mark Lampard at 206-477-5414 or mark.lampard@kingcounty.gov. WTD will designate a point of contact for cooperating agency participation in the near future.

Sincerely,

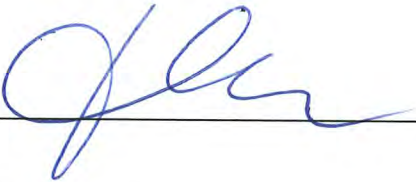


Christie True
Director

Enclosure(s)

**WEST SEATTLE AND BALLARD LINK EXTENSIONS PROJECT
COOPERATING AGENCY DESIGNATION**

- ☒ Yes, King County Department of Natural Resources and Parks wishes to be designated as a cooperating agency for the proposed West Seattle and Ballard Link Extensions (WSBLE) Project.
- ☐ No, King County does not wish to be designated as a cooperating agency for the proposed WSBLE Project. However, King County does wish to be designated as a participating agency.
- ☐ No, the King County does not wish to be designated as a cooperating agency for the proposed WSBLE Project. The County also 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

 (Sign – Authorized Representative)

Christie True (Print)

Department Director (Title)

3/29/2019 (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



King County

Facilities Management Division

Department of Executive Services
500 Fourth Avenue, Room 800
Seattle, WA 98104
Phone: (206) 477-9352
Fax: (206) 205-5070

April 2, 2019

West Seattle and Ballard Link Extensions
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

RE: EIS Scoping Comment: Downtown Segment (International District / Chinatown to Midtown Station Locations and Alignments)

Dear Ms. Swift:

King County is currently underway on a Master Plan for its Civic Campus in the heart of downtown Seattle. The Plan addresses:

- Twenty-one service divisions and departments, among three branches of government;
- Six thousand public employees;
- Eight acres of land, across ten properties, spanning eight city blocks;
- Two and a half million square feet of existing facilities;
- Over four million square feet of zoned development potential; and,
- The public space networks and programs that will connect them.

It is an unmatched opportunity to holistically rethink how government can better serve through the places it has the ability to shape.

The County welcomes continued collaboration with Sound Transit through the EIS process to study and refine proposed Downtown Segment station locations and route alignments, including the exploration of:

- Partnerships to bring new light rail transit service and convenient station entries and/or transfers to the center of the Civic Campus;
- Enhanced wayfinding and connections to existing surface transit and bike and pedestrian mobility networks; and,
- Prospects for equitable Transit-Oriented Development (TOD).

As the Civic Campus Master Plan and West Seattle and Ballard Link Extensions move forward, the County looks forward to building on the shared goals of these two transformational projects.

Sincerely,


Anthony Wright
Facilities Management Division Director



General Manager's Office

201 S. Jackson Street
KSC-TR-0415
Seattle, WA 98104-3856

March 26, 2019

Lauren Swift
Central Corridor Environmental Manager
Central Puget Sound Regional Transit Authority (Sound Transit)
401 S. Jackson Street
Seattle, WA 98104-2826

Dear Ms. Swift:

King County Metro Transit Department (Metro) is pleased to accept Sound Transit's invitation to become a Participating Agency in the environmental review process for the West Seattle and Ballard Link Extension (WSBLE) project. This letter responds to Sound Transit's Request for Comments on Scope of the Environmental Impact Statement (EIS) for the WSBLE project and identifies staff responsibilities for the EIS process.

Metro's top three issues and subsequent needs concerning the project include:

1. Construction in the C-ID would cause substantial, adverse impacts to the regional transportation system, including Metro revenue and deadhead services and the Seattle Streetcar. The 4th Avenue S station options would cause much more disruption to regional mobility and accessibility than the 5th Avenue station options.
 - Development and implementation of reliable, congestion-avoiding pathways in C-ID and Pioneer Square during C-ID Station and tunnel construction will be essential to maintain existing levels of service and avoid significant increases in operating costs.
2. All options in SODO would directly impact the E3/SODO busway and affect revenue and deadhead bus services, including routes that directly serve and are used by priority populations, as well as layover.
 - Maintaining a reliable, direct pathway for buses through SODO during construction and following the line's opening will be critical to providing mobility throughout the region, especially to priority populations.
3. All options in SODO would cause permanent impacts to Metro's base facilities, access to base facilities, and/or base operations, and possibly insuperable construction-related impacts to the adjacent transportation network for all traffic modes.
 - Maintaining existing base access and capacity in SODO is crucial for efficient and cost-effective operations that allow for frequent and reliable transit service to Seattle and the surrounding region.

Sound Transit/King County Metro Coordination

As you know, Sound Transit and Metro have coordinated formally and informally on the development of at least 13 ongoing Sound Transit capital projects over the last several years. In May 2018, Sound Transit and Metro executed the *System Expansion Transit Integration Agreement* (Agreement), which commits the two agencies to delivering investments that achieve the vision of an integrated regional transit network that provides an easy and seamless customer experience. As part of this collaboration, the *Framework for Transit Integration in Capital Project Development* (Framework) was developed to formalize capital project development process in order to ensure an integrated regional transit network. A direct benefit from this collaboration for WSBLE was the inclusion of Metro's 2040 network in the development of the alternatives alignments and transportation analysis.

The Agreement and Framework outline Metro's expected contribution to the EIS process, including scoping and development of alternatives. For reference, Metro's contributions to early scoping and the proposed methodology of the transportation analysis are summarized below and feed into our comments on the current EIS scope and alternatives.

Comments on Early Scoping, March 2018

Metro responded to Sound Transit's early scoping efforts and the purpose and need for WSBLE (Bill Bryant to Lauren Swift, March 5, 2018, Enclosure 1). Some key concerns remain:

- Tunnel options in West Seattle and under Salmon Bay in Ballard should be included in order to promote optimal bus-rail integration and transit-oriented design and to avoid significant impacts from displacements and closures.
- All options for WSBLE directly south of downtown directly conflict with Metro's long-range planned use of the E-3 SODO Busway for multiple routes serving south Seattle and south King County through 2040 and beyond.
- The proposed International District Station would eliminate the only current wired path for Metro trolley buses to reach the Metro Atlantic Base during portions of the construction period.
- High-transfer stations must be strategically located in dense employment and/or residential nodes that serve as anchors for both bus and rail lines, especially in the Alaska Junction and Interbay areas.
- The interim terminus of the West Seattle to Downtown Link may not provide the seamless downtown connection needed to convert any significant share of Metro's West Seattle routes into Link feeder routes and may result in overcrowding on Link between SODO and International District Station.

Technical Analysis and Formal Scoping, February to March 2019

In February, Metro's transportation planning team reviewed and commented on the methodology for the transportation analysis in the EIS. To adequately assess the potential impacts on Metro operations and facilities, comments focused on adjustments to the proposed study area, development of impact criteria and thresholds for transit-related impacts, and the use of primarily quantitative analysis of construction and permanent impacts.

Metro has identified several major potential impacts from Alternatives 1, 2, and 3 on Metro facilities and the local transportation network in the SODO and Chinatown/International District (C-ID) areas that call for a rigorous analysis in the EIS. Our observations of expected impacts are as follows:

- Construction in the C-ID will result in substantial, adverse impacts to numerous Metro services and the Seattle Streetcar.
- Congestion and added operating costs will result from construction during extended periods when Metro would lose access to key roadways, access points, and facilities in use today.
- WSBLE options in SODO would cause massive permanent impacts to Metro's base facilities, access to base facilities, and/or base operations, and possibly insuperable construction-related impacts to the adjacent transportation network for all traffic modes.
- The proposed project will make permanent changes to the transportation system that would affect the speed and reliability of bus services without robust analysis of impacts and adequate mitigation commitments.
- Direct impacts to the E3/SODO busway will affect revenue and deadhead bus services, including routes that directly serve and are used by priority populations, as well as layover

The following recommendations for the scope of the EIS respond to the issues raised above and should be included in the environmental analysis for the WSBLE EIS:

- Analyze the temporary and/or permanent acquisition, displacement, and relocation impacts on the multiple, existing Metro facilities that would be affected; impact analysis should include:
 - Direct costs as well as the opportunity costs associated with disruption;
 - How alternatives would change access (ingress/egress) to existing Metro facilities, including any required revisions to internal circulation;
 - Direct impacts to Metro's planned base expansion along 6th Ave S.; and,
 - Regular and game day (e.g. Mariners, Seahawks) analysis.
- Ensure that the methodology for analyzing transit impacts is sufficiently robust to provide the information Metro and decision-makers need to support Metro and secure a priority long-term transit pathway(s) for buses in key locations such as SODO.
- Consider person-delay, in addition to total vehicle delay, when evaluating permanent and construction impacts.

- Address cumulative traffic impacts during the construction period quantitatively;
 - Include operating costs of detours/reroutes during station construction.
 - Game day and other special events at CenturyLink Field or T-Mobile Park should be included in this analysis
- Address impacts to existing on-street bus layover and bus stop locations displaced by the project.
- Evaluate how direct impacts to existing SODO/C-ID pathways (i.e. E3, 4th Ave S, and 5th Ave S) would affect service, and include a specific review of the demographics of priority populations served by the impacted service.
- Continue to consider creative solutions to keeping the E3/SODO busway open (at a minimum a single lane with pullouts), including looking at the parcels to the east of SODO station to better understand if a station program that extends the footprint to the east that could provide the needed ROW for north/south bus operation to and through the station area.
- Evaluate the expected timing and duration of disruptions to Link light rail service as new lines are tied in, and the plans for rail and bus operations during those time periods.

Alternatives

Metro does not have a specific preferred alternative at this stage. It is important to note, however, that the 4th Ave S C-ID station option would result in significant and unavoidable local and regional transportation impacts that would seriously affect Metro's ability to provide effective mobility along that high-demand and high-volume corridor. Both 4th Ave S C-ID stations would shift thousands of vehicle trips daily into the International District neighborhoods, which would directly conflict with Metro's 5th Ave S trolley bus pathway from Atlantic Base and provide an undetermined pathway for revenue and deadhead service using 4th Ave S. The 5th Ave S station options are much better able to meet regional mobility needs during construction, which is expected to last upwards of 10 years.

Potential Mitigation

All of the alternatives impact the E3 busway as well as Metro facilities and operations in SODO/C-ID to varying degrees. These impacts are inclusive of revenue service, deadhead service, and layover on busway; Ryerson base access and displacement, Central/Atlantic base access, and Central base expansion; and 4th Ave S and 5th Ave S pathways. Sound Transit has a shared need to partner with Metro and a responsibility to accurately assess impacts during the construction period and for the permanent condition. Sound Transit should establish, fund, and advocate for a mitigation program that keep Metro vehicles and customers moving while minimizing any increases in travel times.

Metro Staff Responsibilities

Going forward, Stephen Crosley will continue to be the lead participant and main point of contact for Metro. Gillian Zacharias will be responsible for Metro's internal coordination in support of its role as a Participating Agency during the NEPA and SEPA environmental review process. Their contact information is as follows:

Stephen Crosley
Transit Integration Program Manager
King County Metro Transit
King Street Center
201 S. Jackson St, KSC-TR-0413
Seattle, WA 98104-3856
206-477-5795
SCrosley@kingcounty.gov

Gillian Zacharias
Senior Environmental Planner
King County Metro Transit
King Street Center
201 S. Jackson St, KSC-TR-0431
Seattle, WA 98104-3856
206-477-7915
Gillian.Zacharias@kingcounty.gov

Thank you for this opportunity to comment on the alternatives and scope of the EIS. The WSBL has the potential to provide a significant benefit to the regional network and Metro will continue to work with Sound Transit in our role as a Participating Agency. We believe that implementing the recommendations above will disclose important information needed to develop a balanced Preferred Alternative and to assist the public and decision-makers in selecting the best option.

We look forward to continuing our collaboration to achieve the best project for our shared customers across the region.

Sincerely,



Rob Gannon
General Manager
King County Metro Transit Department

Enclosure 1. Metro Early Scoping Response Letter, March 5, 2018

WEST SEATTLE AND BALLARD LINK EXTENSIONS PROJECT COOPERATING AGENCY DESIGNATION

- ☐ Yes, King County wishes to be designated as a cooperating agency for the proposed West Seattle and Ballard Link Extensions (WSBLE) Project.
- ☒ No, King County does not wish to be designated as a cooperating agency for the proposed WSBLE Project. However, King County does wish to be designated as a participating agency.
- ☐ No, the King County does not wish to be designated as a cooperating agency for the proposed WSBLE Project. The County also 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



(Sign – Authorized Representative)

ROB GANNON

(Print)

GENERAL MANAGER

(Title)

1 APRIL 2019

(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



King County

Department of Transportation
Metro Transit Division
Service Development
201 S. Jackson Street
KSC-TR-0426
Seattle, WA 98104-3856

March 5, 2018

WSB Link Extension
(c/o Lauren Swift, Senior Environmental Planner)
Sound Transit
401 S Jackson Street
Seattle, WA 98104-2826

Dear Ms. Swift:

Thank you for the opportunity to submit comments on the West Seattle and Ballard Link Extension's (WSBLE) purpose and need. In our joint 2014 Transit Integration Report, "Getting there together," King County Metro and Sound Transit envisioned urban transit facilities that would feature reduced travel time, a seamless system, and better customer experience. In order to reach these goals, Sound Transit should consider the following features for the WSBLE project.

Tunnel Options – Sound Transit should consider a tunnel concept in West Seattle and under Salmon Bay in Ballard. A tunnel in West Seattle would allow stations to be located for better bus/rail integration. Other benefits include greater opportunities for transit oriented development and better urban design. The Alaska Junction station will be a critical location for seamless transfers between bus and rail. The representative location of the Avalon station is also not conducive to bus/rail connections and would limit potential transit oriented development. A tunnel under Salmon Bay in Ballard should be investigated to ensure reliability for the entire transit system by avoiding closures.

E-3 SODO Busway – The SODO Busway is a critical Metro Transit path from southeast King County to downtown Seattle. This bus-only transitway provides fast and reliable travel for transit customers that are not and will not be served by existing or planned Link lines. For this reason, King County Metro's long-range vision states that buses will continue to use this path at least through 2040. Some peak-only routes – which are not shown in the 2040 METRO CONNECTS vision – are also assigned to use the Busway. The Busway provides over 1,200 linear feet of layover space, available 24/7, for 21 buses. Busway layover has become increasingly important as Metro's Ryerson, Atlantic,

and Central bases have reached full capacity. King County Metro plans to install comfort stations on the Busway as well. It is essential to Metro's operations that Sound Transit explore light rail concepts that would maintain all bus operations on the SODO Busway.

Trolley Network – Sound Transit must maintain efficient access for Metro's trolley bus network to Metro Atlantic Base. The representative location of the International District Station would eliminate the only current wired path for Metro trolley buses to reach the base, which is necessary for continued operation of the trolley system. Trolley routes currently account for about 20 percent of Metro's weekday transit rides and the current fleet is expected to remain in service until 2035 or later. Maintaining an efficient trolley system is an important component of King County's sustainability commitment.

Alignment and Station Options – Establishing the highest quality rail/bus transfer environment to enable effective system integration at certain stations is a central and shared Metro/Sound Transit goal. These high-transfer stations must be strategically located in dense employment and/or residential nodes that serve as anchors for both bus and rail lines. The Sound Transit Board should investigate alignment options to cross the Duwamish River and reach Alaska Junction. Similarly, an Interbay station more than a very brief walk from 15th Avenue West and the Dravus urban village would be more difficult to effectively integrate Metro with Link and would likely create a less efficient network.

Interim Terminus – The interim terminus of the West Seattle to Downtown Seattle Link Extension, currently considered to be located at SODO Station, may not provide the seamless downtown connection that will be needed in order for Metro to convert any significant share of West Seattle area routes into Link feeder routes and may present load issues for the train between SODO and International District Station.

King County Metro excited to collaborate with Sound Transit to significantly expand transit access to passengers throughout the Puget Sound region. Please contact Lacey Jane Wolfe at 206-263-0802, ljwolfe@kingcounty.gov for questions of further discussion related to the WSBLE project.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Bryant", written over a horizontal line.

Bill Bryant
Managing Director
Service Development



City of Seattle

April 2, 2019

Lauren Swift
Central Corridor Environmental Manager
401 S Jackson St
Seattle, WA 98104

Dear Ms. Swift,

Thank you for the invitation to participate as a Cooperating Agency and the opportunity to provide scoping comments for the environmental process for the Sound Transit West Seattle and Ballard Link Extensions (WSBLE) Project. This letter details the comments and concerns of City of Seattle staff as you determine actions, alternatives, and impacts to be evaluated in the Draft Environmental Impact Statement (DEIS). The City appreciates the ambitious scope and timelines for this project and continues to be committed to helping Sound Transit deliver this project on schedule. The detail in the City scoping letter is provided to state our support for the WSLBE project moving forward and to flag key issues that the DEIS needs to cover, in order to help Sound Transit avoid delays or additional environmental review. In addition to the specific comments attached in the Technical Memo, the following reflect fundamental areas of specific importance.

Alternatives Development

The City commends Sound Transit for the extensive planning and public engagement activities that have informed the alternatives development phase of the project. This advancement of technical work and engagement successfully narrowed the range of potential DEIS alternatives from hundreds down to a few and built agreement in most project segments for what impacts and refinements should be studied. The resulting Level 3 Alternatives should both be advanced for further study in the DEIS. However, as the DEIS further refines these alternatives, Sound Transit must ensure enough flexibility to fully bracket the range of potential environmental impacts and allow for decision-makers to assemble a final alignment that combines the most promising individual segment option(s). The environmental process will need to accurately show the tradeoffs of different station configurations throughout the line. That will help identify options to avoid and/or minimize disruptive impacts for future alignments decisions. The City would like to see additional study, problem solving, and refinements in the West Seattle, Chinatown/International District, SODO, and mid-town segments. In contrast, Sound Transit should feel confident that the final alignment selected in Ballard, Interbay, Uptown, and South Lake Union will be within the range of possibilities represented by the two Level 3 alternatives.

Equity and Mitigation

The segments in the Chinatown/International District and West Seattle include the highest concentrations of communities of color along the project corridor, and as highlighted in the project's Racial Equity Toolkit, should include consideration in the DEIS as follows:

- The Chinatown/International District is a unique hub of cultural importance for the city and its Asian American communities. Historically, the C/ID has endured a disproportionate share of impacts from infrastructure projects, from the Second Avenue Extension in the 1920s to the building of I-5 in the 1960s, Kingdome construction in the 1970s, the Downtown Seattle Transit Tunnel in the late 1980s, and the Seattle Streetcar in the 2010s. Now, as Sound Transit prepares to evaluate alternatives for a new light rail station in this community, the C/ID alignment and station location appear to be the single area of the project with the greatest remaining challenges to resolve. The environmental process will need to study and accurately show the tradeoffs of different station configurations in the neighborhood and to identify options to avoid and/or minimize disruptive impacts. If impacts cannot be avoided or minimized there must be adequate mitigation to offset both short-term construction and long-term impacts.
- The Delridge station area is also a focus of racial equity due to the communities of color and low-income residents along the transit corridor expected to access the proposed Delridge and Avalon stations via bus. These include the High Point, South Delridge, Highland Park, and White Center neighborhoods and South Seattle College. The environmental phase must evaluate enough design options to ensure seamless bus/rail connections at Delridge and Avalon Stations, recognize the importance of this regional intermodal transit hub, and identify impacts to the surrounding neighborhoods that might need mitigation if those impacts cannot be minimized.

Transit Operations

The WSBL project proposes critical new transit connections that will serve hundreds of thousands of riders each day. We encourage Sound Transit to ensure that the project results in efficient, safe transportation operations and intermodal connections to bus and rail throughout the full length of the corridor that maximizes the project benefits. In-depth and robust traffic analysis for vehicles, freight, pedestrians and bicycles will also be needed.

Consistency with City Plans, Policies, and Regulations

As detailed in the attached memo, Sound Transit's environmental review process should ensure that the project alternatives being analyzed are consistent with city policy, plans and regulations and if not, to document variances and inconsistencies. In addition, Sound Transit should ensure that the DEIS fully discloses construction and long-term impacts and identifies creative solutions to minimize those impacts or appropriate mitigation. Sound Transit should ensure that the DEIS comprehensively evaluates the potential for business and residential displacements and relocations. Finally, as the City's role in future permitting and SEPA actions, we stand ready to assist Sound Transit in the environmental process to meet those future rigorous requirements.

Comments on Purpose and Need

The City would also like to offer the following comments on the project Purpose and Need. The City of Seattle offers the following *italicized* modifications:

- Improve regional mobility by increasing connectivity and capacity through downtown Seattle *and the Center City* to meet projected transit demand.

- Implement a system that *balances local impacts with benefits and* is technically and financially feasible to build, operate, and maintain.
- Expand mobility and safety *for multiple modes and users, including freight, bicyclists, pedestrians, those with limited mobility, and all ages and maximize ridership* for the corridor and region's residents, which include transit-dependent, low-income, and minority populations.
- Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development, *affordable housing*, and multimodal integration in a manner that is consistent with local land use plans and policies, including Sound Transit's Transit Oriented Development and Sustainability policies. *Make equitable investments in project services and benefits to historically underserved communities along the alignment, especially people of color and low-income populations.*

This project is the lynchpin for future mobility both within the City of Seattle and also for the Central Puget Sound Region. The connections that converge in downtown Seattle among the three Link lines and the regional transportation network will facilitate travel not just for the light rail extensions to West Seattle and Ballard, but for extensions to Tacoma, Redmond, and Everett as well. The future of the City of Seattle and the region's transportation system is therefore dependent on the success of Sound Transit and the continued build-out of the rail system. This DEIS will help chart the course for success. We appreciate the opportunity to partner with Sound Transit on this crucial project.

Thank you for the opportunity to comment and we look forward to continuing to cooperate on this project.

Sincerely,



Sam Zimbabwe
Director, Seattle Department of Transportation

cc: Shefali Ranganathan, City of Seattle Deputy Mayor

TECHNICAL ISSUES MEMO (in alphabetical order)
Attachment to Seattle Department of Transportation's Scoping Comments for
Sound Transit West Seattle Ballard Link Extensions DEIS

ISSUE: Acquisitions, Displacements, and Relocations

The DEIS should evaluate potential impacts to the following:

- Potential physical, economic, and cultural displacement of residents and businesses, as well as potential racial disparities in displacement outcomes, through the following lenses:
 - anticipated net physical displacement due to direct site acquisitions and redevelopment
 - anticipated economic displacement from rent and property tax increases, based on market trends and historical housing and land price changes in similar station areas. Economic displacement occurs when a household is compelled to relocate due to the economic pressures of increased housing costs or other costs of living.
 - anticipated cultural displacement, based on any anticipated physical or economic displacement of cultural anchors, community-serving and culturally relevant businesses, and community members that could reduce a sense of belonging for the existing community overall. Detailed analysis will be particularly important at the Chinatown/International District and Delridge Station sites. Sound Transit should identify the anticipated "non-acquisition development outcome" of each potential acquisition site - to recognize some sites have higher potential than others of remaining, or becoming, culturally relevant due to the degree to which existing owners are socially embedded in community and invested in community ownership and legacy. To steward and support strong communities, ST should minimize the acquisition of sites that have high potential of being community-based assets on their own, recognizing that institutional development is less well positioned to restore social networks lost through an acquisition process.

ISSUE: Construction methods

The DEIS should evaluate potential traffic, air quality, and public right-of-way impacts of construction of the project. The DEIS should also analyze

- how using a single large-diameter tunnel boring machine instead of twin smaller boring machines could affect environmental impacts through downtown Seattle.
- Method of tunnel spoils removal (truck vs conveyor, other) for all stations and importantly the CID, midtown, SLU and Ballard stations.
- Relative impacts of elevated vs at-grade vs cut-and-cover tunnel vs bored (single and double) tunneling

ISSUE: Coordination

- Project coordination: Sound Transit, the City and project proponents must coordinate planning and design activities among a number of projects, as well as WSBLE support facilities that require additional land (TPSS, vent shafts, maintenance access, etc.). These include:
 - Magnolia Bridge replacement
 - Ballard Bridge replacement
 - Seattle Center Arena development
 - WSDOT SR-99 replacement
 - Memorial Stadium redevelopment
 - Expedia campus development
 - Armory redevelopment study
 - RapidRide H

- Madison BRT
 - Jackson Hub
 - Westlake Hub
 - 4th Ave Viaduct
 - Imagine Greater Downtown
 - SPU Ship Canal Water Quality
 - SCL Denny Substation Transmission and Distribution
- Event coordination: The Seattle Center campus (located within the Uptown Arts and Cultural District) is home to community and cultural events year-round. These include the Seattle/King County Clinic, Seattle Center Festál, Winterfest, the Northwest Folklife Festival and Bumbershoot, performances at the Mural, numerous marches, walks and runs, and other arts, entertainment and sporting events hosted in venues on the Seattle Center campus. These events, and the passive enjoyment of the public open spaces on the campus, could potentially be disrupted by noise, vibration and transportation impacts related to construction activities. The DEIS should consider the schedule of events and the potential impacts. Seattle Center is willing and ready to work together with Sound Transit to help understand the event schedules on the campus and to mitigate potential impacts when planning for construction of the WSBLE. The DEIS should also consider the schedule of events throughout the project area while planning construction sequencing and staging.

ISSUE: Economics

- The DEIS should evaluate potential impacts of long-term, ongoing impacts of transit operation and land acquisition on local and regional economic conditions, and the short-term impacts of construction (including due to subsurface tunneling activity) on businesses and business districts.
- The DEIS should evaluate impacts to the Duwamish Manufacturing Industrial Center, including port terminals and facilities (especially water dependent uses on the shoreline) as well as to the supporting freight infrastructure.

ISSUE: Ecosystems

The DEIS should evaluate potential impacts to the following:

- All temporary and permanent construction-related impacts and areas, including staging areas, access road construction, borrow sites, spoiling sites, etc.
- Waters of The U.S., State, And City: The DEIS should disclose the location, characteristics, functions, and values and the acreages of Waters of the U.S., Waters of the State, and waters/wetlands regulated by the City of Seattle but not by federal or State agencies likely to be affected. The DEIS should address direct, indirect, and cumulative adverse impacts to these waters/wetlands. Potential impacts to waters/wetlands include, but are not limited to, sedimentation, turbidity, removal of riparian vegetation, stormwater runoff, water quality impacts, bank erosion, bank hardening, loss of natural floodplain, and so forth. The DEIS should address opportunities for improving the quality and quantity of these areas in the design and siting of proposed facilities; mitigation sequencing; and then compensatory mitigation for any residual unavoidable impacts to these waters/wetlands, as per requirements in the City's Environmentally Critical Areas (ECA) provisions (SMC 25.09.065 and 25.09.070), as well as requirements in other federal and State regulations. The scope of the impacts and analysis of mitigation options will require consultation among these agencies. The DEIS should describe this consultation process and its outcomes. The DEIS must examine the natural resource impacts of proposed alternatives even if they would not result in direct impacts resulting from fills. This proposal will trigger a local government ECA review, which is the point where SDCl will formally review the project for consistency with the applicable ECA regulatory standards. An ECA Exception (SMC 25.09.300) may be triggered if the proposal is not allowed by the City of Seattle's ECA

regulations (SMC 25.09.160 in particular). The proposal would need to be consistent with general development standards in SMC 25.09.060, which address potential ecological impacts, as well as development standards in SMC 25.09.065 for mitigation, SMC 25.09.070 for tree, vegetation and impervious surface impacts and SMC 25.09.160 for development in wetlands and their buffers.

- **Urban Forest:** The DEIS should address direct and indirect adverse impacts to the City of Seattle's urban forest infrastructure (viz. the City of Seattle's Tree Protection regulations as embodied in SMC Chapter 25.11 and in associated guidance and policies found in SDCI Director's Rule 16-2008 and in the City of Seattle's Executive Order 03-05). The City of Seattle has made important strides in assessing the extent and health of its urban forest, which include trees on private and public properties (parcels) and in developed and undeveloped rights-of-way. The DEIS should evaluate and disclose the specific direct, indirect, cumulative, temporary, and permanent adverse impacts that may affect trees in the urban forest. The DEIS should apply mitigation sequencing to potential impacts related to trees in the City of Seattle's urban forest and should propose mitigation for unavoidable adverse impacts to those trees and the urban forest. The DEIS should also identify best management practices that would be used to ensure the protection (during construction and operation) of crowns and root zones of trees identified to be retained. Please reference the Seattle Center Century 21 Master Plan Landscape Guidelines for detailed description and recommendations regarding Legacy Trees on the campus.
- **Groundwater:** The DEIS should address direct impacts related to groundwater particularly as to the impacts of tunneling in the dewatering of previously filled wetland and/or marine lands. For example, tunneling would occur in areas of the City that were formerly intertidal wetlands, intertidal mudflats, or unconsolidated marine seabeds and which have been filled over time. These fill materials can be perpetually saturated. Dewatering normally saturated fill during construction and/or operation can lead to subsidence or other indirect impacts.
- **Wildlife:** The DEIS should clearly disclose current wildlife usage along the proposed corridor (including wildlife migratory routes) and identify all significant impacts to wildlife species and wildlife habitats, including all potentially affected State Priority Species and Habitats and Species of Concern (including, for example, great blue heron, salmon and salmonid species, and bald eagles), all significant impacts related to the human recreational use associated with those species, and all economic impacts to wildlife resources and recreation. The DEIS should disclose the physical loss of habitat and reduction in diversity and habitat effectiveness that may be caused by the construction and operation of this proposal. The DEIS should address how the project would comply with the Migratory Bird Treaty Act and commit to an avian conservation plan (prepared in consultation with regulatory agencies and interested stakeholders) to address the potential for take and disturbance of birds and nests.
- **Invasive species:** The DEIS should disclose this proposal's potential to introduce new, or spread existing, invasive animal and plant species and pathogens (for example, Chytridiomycota) and other organisms that may cause disease or other adverse alterations to ecosystem functioning. The DEIS should disclose how the operation of this proposal would control vegetation, including invasive and noxious plant species, in and around the proposed facilities.

ISSUE: Energy

The DEIS should evaluate potential impacts to the following:

- Energy demands of deeper tunnel stations, for longer elevator/escalator runs, ventilation fans, etc.

ISSUE: Geology/Soils

The DEIS should evaluate potential impacts to the following:

- Geologic hazards per the Environmentally Critical Areas (ECA) code SMC 25.09, particularly in steep slopes near the Queen Anne Greenbelt (north tunnel portal) and Pigeon Point.
- Adjacent properties due to shoring and excavation, grading, dewatering, etc. per the grading code SMC 22.170

ISSUE: Hazardous Materials

The DEIS should evaluate potential impacts to the following:

- Contaminated soil and groundwater, and cleanup action plans (if applicable) per the grading code SMC 22.170

ISSUE: Historic and Archaeological Resources

- The DEIS must identify historic and cultural resources in the study area, both above and below ground, and assess and provide analysis regarding direct impacts, such as construction impacts (noise, vibration, dust, etc.) and demolition impacts, and indirect impacts, as well as cumulative impacts; particular focus should be on the cumulative impacts on the two historic districts within the study area - International Special Review District and Pioneer Square Preservation District and any city or federal designated landmarks. A clear methodology regarding the identification and analysis of historic and cultural resources should be provided, as well as documentation of the existing regulatory framework.
- The DEIS should consider impacts within meander line buffer or other known sites (reference SDCI Director's Rule 2-98 – note that some citations in Director's Rule may be out of date). Rule discusses minimum steps needed for analysis under "During Review of the Master Use Permit".
- Any new construction proposed within the International Special Review District and the Pioneer Square Preservation District will require Certificates of Approval from the relevant Boards. The Board will utilize the Secretary of the Interiors Standards for Rehabilitation in reviewing proposed projects. Additionally, the lead federal agency and ST should consider their Section 106 responsibilities with regard to cultural resources as early as possible in the process, and plan their public participation, analysis, and review in such a way that they can meet the purposes and requirements of both NEPA/SEPA and the Section 106 statutes in a timely and efficient manner. The City of Seattle is a Certified Local Government (CLG) and will participate in the Section 106 consultation process.
- The City has responsibilities under the Shoreline Code (SMC 23.601) to consult with affected Tribes and the State Department of Archaeology and Historic Preservation (DAHP) similar to consultation under the federal (Section 106) and state (Executive Order 05-05) consultation processes. To avoid duplication of efforts, shoreline permits for the project should be conditioned based on results of FTA's consultation with affected Tribes. The City has additional coordination responsibilities with state and federal agencies and affected Indian Tribes for mitigation sequencing when multiple permits are involved.

ISSUE: Human Health

- Public health statistics show that chronic diseases and health issues are inequitably distributed, with low-income neighborhoods and communities of color bearing a greater burden and demanding greater attention.

- The DEIS should evaluate potential impacts on human health due to the construction and operation of the project.

ISSUE: Land Use

Sound Transit should consider the following in urban design analyses and Transit Oriented Development studies that inform the Draft EIS:

- **Overbuild and co-development opportunities:** Identify opportunities for development above or integrated with stations (to maximize transit-oriented development potential) or identify the environmental impacts of not maximizing or limiting station sites for co-development. Clarify co-development opportunities in easily understood visual diagrams. Identify the anticipated acquisition and development schedules for land considered for acquisition as well as locations where an alignment or station alternative might preclude or limit opportunities for new land use or redevelopment.
- **King Street-Union Station Multi-Modal Hub:** The DEIS should coordinate with ongoing efforts to analyze the potential for developing King St Station and Union Station into a multi-modal hub, consistent with multiple studies over the years. Sound Transit should identify impacts the project could have on these efforts, particularly those that would preclude opportunities for joint development, over-track development along 4th, as well as co-ownership and long-term operations, and the potential for this hub to be an asset to the communities that have been underserved historically with infrastructure projects in the past, within adjacent buildings and existing or potential public plazas.
- **Delridge Station:** The DEIS should identify impacts the project could have on efforts to provide culturally relevant commercial, residential, services, and/or community uses.
- **Ancillary Commercial and Community Station Uses:** The DEIS should study the provision of space for retail, services, and/or community uses in key stations, examine the potential for culturally relevant uses and programming. Estimate the magnitude of additional costs of building stations to accommodate these other uses.
- **Transit-Oriented Development:** The DEIS should identify potential development opportunities for affordable housing on sites acquired for light rail construction and staging. Identify the relative opportunity for future affordable housing development across alternatives and among different potential acquisition sites within each alternative.
- **Elevated stations within rights-of-way:** factor in the actual costs, disruption and impacts (construction and permanent) to existing pedestrians, traffic and businesses, as compared to acquisition of and construction on ROW-adjacent properties, which can be co-developed with platforms that are integrated into TOD-supportive uses and structures, which support an activated public realm.
- **Construction and staging acquisitions** should factor in potential TOD redevelopment scenarios, including not only housing and community services but also public open space to support placemaking and intermodal connectivity.
- **Acquisitions—even at fully underground stations—**should provide for multiple and visible station entrances at grade, sized and located to meet projected pedestrian capacities and desire lines, including transfers to other travel modes. Where appropriate, major entrances should be integrated with existing or potential new plazas or and public open spaces that can serve as community focal points and activity centers.

ISSUE: Noise and Vibration

The DEIS should evaluate potential impacts to the following:

- Noise associated with Elevated trackways
 - Operation of trains on rail
 - Maintenance of the rail including schedule
- Mechanical and ventilation system placement in relation to sensitive noise receptors
- Noise associated with rail stations, in relation to sensitive receivers. Specific attention to residential use properties, research facilities, KEXP radio at Seattle Center etc.
- Noise associated with soil-freeze and ground freezing (if required for ground water control)
- Noise associated with dewatering process
- Construction and operational impact mitigation to include notification of affected property and business owners

ISSUE: Parkland and Open Space

The DEIS should evaluate potential 6f/4f/Initiative 42 impacts due to direct use, construction use, or shadowing to the following resources:

- Kinnear Park
- Queen Anne greenbelt
- West Duwamish greenbelt
- West Seattle golf course
- Interbay golf course
- Interbay p-patch
- Delridge Playfield and Community Center
- Junction Plaza Park
- Gemenskap Park (14th NW)
- Westlake Park (due to increased usage)
- City Hall Park (due to increased usage)
- Construction analysis should anticipate need for revocable use permits to allow for temporary use of park property during construction.
- Identification of any possible construction staging areas that might be on Park properties or easements

ISSUE: Public Services, Safety, and Security

The DEIS should evaluate potential impacts to the following:

- Seattle Fire Department emergency response plan
- Effects on emergency response routes and response time throughout affected travel corridors
- Maintenance of light rail life safety systems
- Design, installation and commissioning for life safety systems
- Emergency response access during construction to worksites and adjacent properties
- The DEIS should identify environments/facilities and situations that do not currently exist to inform training plans for emergency response personnel
- Water supplies to fire hydrants and emergency equipment (e.g. fire pumps and sprinkler systems) should not be impaired

ISSUE: Public Utilities

The DEIS should evaluate potential impacts to the following:

- Royal Brougham: Large Waste Water pipe needing bypass during construction

- Ship Canal: Outfall impacts and offsets. Required clearance of stormwater tunnel and its assets.
- Golf course as detention: The DEIS should evaluate opportunities for stormwater detention. In the Delridge area, Sound Transit should be aware that the West Seattle Golf Course may already be fully utilized as detention for Longfellow Creek.
- Pigeon Point/West Seattle Greenbelt: Slope stability issues; please include in drainage report any potential downstream impacts that could result from new drainage infrastructure.
- Queen Anne Greenbelt: Slope stability issues; please include in drainage report any potential downstream impacts that could result from new drainage infrastructure
- The DEIS should identify any possible construction staging areas that might be on SPU properties or easements.
- For acceptable clearances from Seattle City Light (SCL), please see SCL Construction Standard 0214.00. Locations, dimensions and depths of SCL's vaults, manholes, hand holes and duct banks within the plans affecting areas must be verified (e.g. pot hole) prior to construction to avoid any damages to existing SCL facilities. This information will be especially needed if ST3 project intends to excavate near SCL facilities. SCL has duct banks with energized primary (13,000 volt and 26,000 volt) cables within the project boundary. Contractor(s) need to exercise care in excavating and must contact Seattle City Light to arrange a safety standby when working within 5 feet of SCL's electrical facilities. One important item to note is that trees, vegetation, planter boxes, etc. are not allowed within 2 feet of SCL vaults and ducts. Minimum clearances shall be maintained from the proposed new elevated structures to the existing transmission and distribution lines.
- The DEIS should perform a comprehensive evaluation (i.e. transportation impacts, environmental, real estate, etc.) of the proposed alternative utility corridors for the possible relocation of the existing SCL Transmission and Distribution systems, either within or outside the project impact areas of the identified level three alternative(s). The DEIS should evaluate anticipated right of way, utility access/maintenance agreements, easements etc. necessary to support the legal, safe, and continued reliable operation of the utility system. Therefore, it is anticipated that The ST3 DEIS will be inclusive of any and all Seattle City Light actions foreseeable at the time of the Draft EIS.
- West Seattle Bridge: There are existing 34 kV overhead distribution circuits located on both the north and south side of the existing West Seattle bridge which may conflict with the two proposed elevated crossings over the Duwamish Waterway. Again, any proposed alternate routes for rerouting the 34 kV should be included and evaluated as part of the DEIS scope. The proposed elevated structures on both the north and south sides of the West Seattle Bridge appear to conflict with an existing transmission and distribution lines at 2nd Ave South and South Spokane Street.
- E3 Busway: SCL and ST have been discussing required clearance and alternatives to the proposed relocation of the existing 230 kV overhead transmission lines and 26 kV distribution lines along the existing E3 Busway. Planning/preliminary efforts between ST and SCL began in 2018 should continue during the DEIS.
- SCL has proposed a 230 kV transmission line (MA-DN) from the Denny Substation in South Lake Union to the Massachusetts Substation in SODO, scheduled to be constructed 2021. ST should continue to evaluate and ensure that minimum clearances are met for both overhead and underground portions of the proposed MA-DN Line: 25' for transmission lines and 14' from distribution lines.
- SCL MA-DN Line (underground): ST's Level Three alternatives identify several locations along our existing and proposed transmission line. Specific areas of concern are the along portions of 6th Ave (James St to Jefferson St), and along 5th Ave from Jefferson south to S Charles Street, in which there are shallow bore options and cut/cover options proposed. We encourage ST to continue working with SCL to coordinate the final planning/design phases of the selected route with SCL. Should the

proposed MA-DN line need to be routed to an alternate corridor, the corridor evaluations should be included as a part of the DEIS scope.

- SCL MA-DN Line (overhead): 6th Ave S, South of S. Royal Brougham Way to S Massachusetts; thence west to Massachusetts Substation: ST at grade, elevated, and tunnel options should be evaluated to address minimum clearance requirements, as well as impacts that ST alternatives will have to SCL structures (i.e. pole foundations, vaults, transformers, etc.)
- Mercer St and 8th Ave N (approx. 100' east of intersection), Republican and 6th Ave N, Harrison St and Taylor Ave N (approx. 75' east of intersection): proposed bore tunnel alignments conflict with existing SCL 115 kV alignment. ST to check to ensure lines are protected during construction and maintain required underground separation distances. Also, there is one circuit of 115 kV overhead transmission line and support foundation which may be impacted by the proposed tunnel bore alignments (Harrison St and Taylor Ave N)
- There are existing SCL duct banks and vaults throughout the project areas that are not shown in the plan design drawings for SCL to assess overall impacts to our existing Underground Network System. System upgrades, feeder relocations, and overall impacts should be continued to be evaluated by ST throughout the planning and preliminary engineering stages. Cut/cover construction options proposed for sections of tunnel and/or stations may be cause a high level of disruption and technical engineering challenges. We recommend that ST continue to study/evaluate impacts to their proposed alignments with respect to these existing underground feeders.
- ST3 Representative Alignment along 15th Ave NW may conflict with the existing 26 kV overhead Distribution lines on both the east and west side of 15th Ave NW. These are double circuited alignments (i.e. two circuits on each side) which may be difficult to reroute/relocate.
- In general, only one service connection is allowed per station location.
- ST should continue to work to identify the locations of the proposed traction power substations (TPSS). Redundancy of primary feeders required by ST for TPSS facilities must be agreed to with SCL years before construction or route is finalized. Metering locations should also be considered and made accessible to SCL personnel .
- Required outages will need to be coordinated through Seattle City Light's Systems Operation Center. To the extent practicable, consider design and construction methods which limit the requirement for long term power outages, especially as they relate to the existing transmission system. Transmission outages may need to be coordinated regionally. Typically, only one transmission circuit will be de-energized at any given time and the amount of time allowed may/may not coincide with proposed future construction schedules. Planned outages should be discussed with Seattle City Light staff a minimum of one year in advance to allow ample time to coordinate and request outages.
- The DEIS should evaluate necessary improvements/impacts to the Street Lighting system. Identification of any possible construction staging areas that might be on SCL properties or easements

General Note: ST should continue to work with regulatory partners to look for streamlining opportunities, such as WSDOT and SDOT for the route selected, and include all utility work/relocation and upgrades necessary to support the selected alignment with those opportunities, if feasible. The DEIS should be inclusive of all Seattle City Light actions that will be required to accommodate the project (i.e., the full breadth of environmental impacts from the Project inclusive of all coordinating parties' activities).

ISSUE: Social Impacts, Community Facilities, and Neighborhood resources

The DEIS should evaluate potential impacts to the following:

- Involve underrepresented communities in mitigation identification

- Consider access to assets: Parks and open spaces, cultural and community centers are assets. Hillside open spaces can also negatively impact mobility. The DEIS should consider the impacts and migration related to access to the neighborhood's assets.
- Access to opportunity: Identify connections with nearby opportunities (such as schools, or low-barrier employers such as hotels) and social determinants of health (such as open spaces and community centers). Consider hillsides and other barriers to pedestrian access to such assets. Use the information to inform siting, pedestrian connections, and built improvements.

ISSUE: Transportation Environment and Consequences

The DEIS should evaluate potential impacts to the following:

- The West Seattle to SODO portion of the project is proposed for completion in 2030 with a connection to downtown not occurring until 2035. During peak periods, West Seattle riders would be attempting to transfer to completely full Central Link trains. Alternatives to this proposal should be evaluated. The DEIS will need to consider the potential number of people transferring from one train to another and whether there will be enough space on the platform to accommodate a smooth transfer.
- ID Station transfers: Analyze potential effect on inter-modal connections.
- Westlake Station transfers: Evaluate connections to streetcar, monorail, surface-level bus, and other Link line. Will need good wayfinding signage and capacity for high volume transfers between Link lines.
- Midtown Station depth and elevator-only access: The DEIS should evaluate the effect of elevator-only access on ridership and consider opportunities to include horizontal station access. The DEIS should also evaluate opportunities to enhance station access by seamlessly integrating with Madison BRT.
- Delridge bus/rail integration: Pedestrian movements between bus stops and rail platforms need to be thoughtfully analyzed with safety as highest priority in mind. More people will be crossing major streets to transfer between modes.
- South Lake Union bus/rail integration: Evaluate connections to streetcar and surface-level bus. Will need good wayfinding as you transfer from underground to surface-level transit.
- E3 busway displacement: The DEIS will need to evaluate the effect on transit, general purpose and freight operations due to displacement of buses from E3 busway and/or due to restrictions or modifications in access to King County Metro's Central/Atlantic and Ryerson bus bases.
- Bus layover footprint: Effect of layover demand on station footprint, circulation, and cost
- Freight: Along the WSBLE alignment, the Freight Master Plan denotes severe freight bottlenecks along the West Seattle Bridge, S Spokane St, and the 1st Ave S bridge. All potential alignments affect these locations, these bottlenecks. The DEIS should evaluate how construction of any one of these alignments can mitigate intensified bottlenecks along these segments.
- Bike: The WSBLE closely aligns or parallels part of the regional bicycle network within the City of Seattle. The DEIS should consider how bicycle access to stations along the alignment can leverage the existing regional network. Additionally, this may be an opportune time to evaluate the value of potential multi-modal hubs (or shared-mobility hubs) at the ends of the line, in West Seattle and in Ballard.
- Pedestrian: The DEIS should use the priority investment network in the Seattle Pedestrian Master Plan as a base layer to be able to better align transit investments with warranted pedestrian improvements, especially if it improves access to the stations and/or corresponds with priority pedestrian corridors such as safe routes to school.

- The DEIS should include a volume/capacity analysis for all collector arterial or higher classification intersections within the half-mile general study area at all proposed stations. This is especially important at the termini, West Seattle and Ballard. In the downtown area, analysis should evaluate impacts of 5th versus 6th Avenue alignments and should evaluate construction conditions and impacts to the pedestrian network from the pedestrians accessing the stations.
- Study the full impacts of elevated stations, including the needed stairs, elevators, structure and other vertical elements that impact grade. This is especially critical when stations are proposed within existing Rights of Way, where sidewalks and other movement facilities need to be expanded to support transit rider capacities. Consider locating platforms and vertical elements on adjoining properties to reduce ROW impacts and create elevated structures that can be integrated within the overall streetscape, with street-level activation where possible.
- The DEIS should identify impacts to lane/sidewalk widths and/or number of lanes/feet of sidewalk (travel, transit, bike, freight, pedestrian) due to elevated guideway columns and/or stations.
- The DEIS should also identify any temporary (with estimated duration) reduction in space for travel/freight/transit/bike/pedestrian use during construction.
- Transportation Network Companies(TNCs) will have a significant impact on traffic operations and circulation near the station areas and current methodology does not indicate how the impact of TNCs and circulation patterns will be evaluated. This is an integral part of the analysis for the project and should be included. How TNC pick-up and drop-off will interface/interact with private passenger pick-up and drop-off circulation patterns near the station need to be studied
- The transportation section of the DEIS should examine a full range of potential transportation impacts, including impacts to local arterials and roadways, bus and streetcar operations, pedestrians, bicyclists, freight, and parking. The analysis should consider permanent impacts from the completed project as well as impacts due to construction activity, including truck traffic from excavation and tunnel spoils removal.
- Identification of impacts to local arterials and roadways should include impacts both to individual intersections and along corridors.
- Analysis of hide-and-ride parking impacts, and identification of measures to reduce such impacts, will be particularly important at terminal stations.
- During the DEIS, Sound Transit should closely coordinate with SDOT to fully evaluate and understand any potential impacts to the dozens of bridges, areaways, stairways, and retaining wall structures located near the proposed project. This analysis should consider physical impacts to structures as well as operational impacts to movable structures such as the Ballard Bridge and Spokane Street swing bridge.
- Parking studies: The DEIS should include parking studies within one-quarter mile of the station. Please allow study to occur 18-24 months prior to scheduled station opening to allow sufficient time for data collection and stakeholder engagement. Note that for earlier ST projects, this timeline was 12 months and that has been too limiting, not allowing sufficient time for evaluation. SDOT expects similar scope language as previous Link Records of Decision regarding parking studies around light rail stations.
- Parking management: The DEIS should identify all necessary parking management infrastructure such as paint and signage and the labor for installation, within one-quarter mile of the station.
- The DEIS should evaluate opportunities to reduce construction impacts on on-street parking by limiting construction worker parking and/or staging in Seattle Right-of Way.

ISSUE: Visual and Aesthetic Resources

The DEIS should evaluate potential impacts to the following:

- **Guideway Studies:** Provide guideway design studies. Study how the very high guideways would be designed and provide alternative guideway designs. There will be many miles of guideways in Seattle and they will be running over and along our hills, waterways, and neighborhoods. The DEIS should be clear about illustrating the community and visual impacts of the guideways in various settings and must provide for the ability to choose from alternatives and fine tune them later.
- **Bridge Studies:** Provide visual and aesthetic analysis of the bridge alternatives. Provide state of the art visual communication of the bridge alternatives. Coordinate with the City of Seattle to identify views from the vantage points of a representative sample of those who will be able to see the bridges.
- **Portal Studies:** Provide visual studies of the various portal alternatives. Provide analysis of the non-motorized context at the portal and impacts to these of the location and design alternatives.
- **Traction Power Substation (TPSS) Studies:** Provide TPSS studies exploring various locations, typologies, and designs. Provide visual information about the TPSS site features and technology. Provide alternatives and explain the costs and benefits of them.
- The DEIS should analyze footprint, bulk and scale within the neighborhood context. Sound Transit should visually communicate, using the latest and best visualization technology and methods, how each proposed station and site development relates to the character of the surrounding built environment. During design development, Sound Transit should provide a graphic representation of streetscape compatibility, relation of proposed station to existing land uses, bulk and scale, open space (existing and potential).
- **Light and Glare**
 - Consider impacts per SEPA policies SMC 25.05.675K
 - Land Use code regulates or limits spillover light in specific regulations per zone
 - Shoreline Master Program regulates artificial light at night SMC 23.60A.152Q
- **Public View Protection**
 - Consider impacts per SEPA policies SMC 25.05.675P (scenic routes, specific protected places, certain views of Space Needle)
 - Consider impacts of any reduced views of shoreline, especially at street ends, waterways or view corridors on specific properties (based on analysis of permit records for shoreline sites near ST3 work)
 - Impacts on downtown view corridors per SMC 23.49.024. If alignment is in tunnel, above-ground stations still must comply.
- **Shadows on Open Space**
 - Impacts per SEPA policies SMC 25.05.675Q, especially street ends in shoreline
 - Shadowing overwater, especially near-shore or where structure is close to water
- **Additional considerations:**
 - Take topography into account in visual and aesthetic analysis
 - Provide data on the cumulative visual impacts of infrastructure in the Seattle landscape
 - Involve underrepresented communities in mitigation identification

ISSUE: Water Resources

The DEIS should evaluate potential impacts to the following:

- **Shorelines**
 - Potential overwater and in-water impacts. The proposed extensions will include development in the Shoreline District over or under the Ship Canal and within 200 feet of

the Ship Canal and at the Duwamish Waterway and within 200 feet of Ordinary High Water in this area. Overwater impacts and in-water impacts were studied as part of 520 bridge DEIS and permitting, so can provide possible guidance.

- Habitat and ecological impacts of new overwater coverage and in-water development (e.g., shading, increased potential for predation to salmonids, displacement of aquatic habitat, dredging, aquatic vegetation impacts, water quality, stormwater runoff, etc.). due to potential bridges over water or in water (e.g., bridge supports, fill). Habitat mitigation will likely be required per requirements in the City's shoreline code (SMC 23.60A.152, SMC 23.60A.158) as well as other state and federal regulations. The scope of the impacts and analysis of mitigation options will very likely require consultation among these agencies. The earlier these consultations can begin, the better.
- Any changes to vegetation or impervious surface within the Shoreline District. These changes will need to be consistent with standards in SMC 23.60A, including SMC 23.60A.152 and SMC 23.60A.190. Mitigation requirements may be triggered depending on impacts. The standards in SMC 23.60A.152 address several environmental impacts and mitigating measures, including surface and groundwater water quality.
- Potential for artificial lighting spillage into the Ship Canal or Duwamish Waterway from bridge lights or track lights will need to be analyzed as artificial lighting at night can cause substantial negative impacts to migrating salmonids (see SMC 23.60A.152.Q for relevant development standard in shoreline code). Impact methodology and analysis should utilize relevant research from local scientists from UW, NOAA, USFWS on effects of artificial light on salmonids in the Ship Canal and Puget Sound.
- Consistency with the City's shoreline code. This includes a number of development standards that the project will need to be consistent with beyond only SMC 23.60A.152, SMC 23.60A.158, and SMC 23.60A.190. These include the standards in Urban Industrial Shoreline Environment (SMC 23.60A.492-496), which includes height standards and the Conservancy Navigation Shoreline Environment (SMC 23.60A.240-248) for the water portion of the Ship Canal.
- Urban Maritime Shoreline Environment. If there will be construction or staging on the west side of the Ballard Bridge and south side of the Ship Canal, then the Urban Maritime Shoreline Environment will be applicable (SMC 23.60A.502-516).
- Standards for bridges and tunnels and train transit facilities. SMC 23.60A.196 regarding bridges and tunnels and SMC 23.60A.209 for train transit facilities are particularly relevant to this project and may impact design and associated environmental impacts.
- Riparian
 - Regulated streams. The project extension in West Seattle may impact at least one regulated stream (Longfellow Creek) and its associated riparian management area. Any development over or under the creek or within 100 feet of the creek is subject to standards in the Environmental Critical Area (ECA) Ordinance (SMC 25.09) with respect to a regulated stream and the riparian management area.
 - An ECA Exception (SMC 25.09.300) may be triggered if the development is not allowed by the ECA code (SMC 25.09.200 in particular). The project will need to be consistent with general development standards in SMC 25.09.060, which address potential ecological impacts, as well as development standards in SMC 25.09.065 for mitigation, SMC 25.09.070 for tree, vegetation and impervious surface impacts and SMC 25.09.200 for development within the riparian management area. Impacts to any vegetation within a riparian management area or changes to impervious surface or grading will need to be evaluated and mitigation measures may be required.

- Potential impacts to stream include sedimentation, turbidity, removal of riparian vegetation, stormwater runoff, water quality impacts, bank erosion, bank hardening, loss of natural floodplain, etc.

- Drainage
 - If groundwater needs to be discharged to the public system during or after construction there are specific guidelines for obtaining approval. These include maximum discharge rates, approved points of discharge, approved connections to the public system, groundwater contamination, flow control and billing of discharge. Dewatering to combined systems requires approval from the City, County and may require metering for billing. Dewatering to a Storm System that is contaminated requires permit approval from Department of Ecology.
 - City of Seattle Municipal Code Title 21.16 Side Sewers
 - City of Seattle Department of Planning and Development Director's Rule 4-2011

March 14, 2019

Sound Transit
401 S. Jackson Street
Seattle, WA 98104

Sent via: wsblink@soundtransit.org

RE: Scoping Comments for West Seattle to Ballard Link Alignment Options

Thank you for the opportunity to express both our general support for, and specific concerns with the proposed West Seattle to Ballard Link alignment. The University of Washington supports the expansion of light rail transit in the Puget Sound Region to serve residents, employees and visitors. We look forward to continuing to discuss Sound Transit's plans. We understand Sound Transit has identified three alternatives to evaluate in an Environmental Impact Statement. For your consideration in the analysis of alternatives for the route and station locations, we provide information about our concerns for the segment of this alignment in South Lake Union near our UW Medicine biomedical research facilities and Downtown Seattle.

UW Medicine Biomedical Research Facilities in South Lake Union

The UW Medicine facilities at South Lake Union consist of four existing biomedical research and clinical buildings and one administrative and dry lab office building. The facilities are located on multiple parcels of land between Mercer and Republican Streets, and Dexter and 9th Avenues. They range in height from 4 to 8 stories and sit above 3-story, below-grade parking and service levels with close to 700,000 square feet (sf) of occupied space above grade and approximately 310,000 sf of below grade parking and service space. UW Medicine has actively supported the City of Seattle's South Lake Union planning and rezoning efforts and worked extensively with city staff to assure each building's uses and designs support the neighborhood plans and policies.

The facilities contain highly sensitive receptors and experiments which could be subject to potential significant impacts due to construction and operation of light rail near the buildings. Vibration and EMI impacts, in particular, could diminish or completely prevent the research that the individual buildings and this complex was specifically built to provide.

South Lake Union ST Alignments

For these reasons we do not support the Brown alignment nor the Green alignment through the South Lake Union/Denny neighborhood, as these alignments both run immediately adjacent to our below (and above) ground facilities along Mercer St. and Republican St.,

respectively. Of the three alignments shown in the ST scoping materials, the Purple alignment is the better of the three options, but the University would still have concerns as described below.

Scope of Impact Analysis Required

We believe significant unavoidable impacts could occur and that the following scope of analysis is required to determine those impacts and to inform Sound Transit's decisions regarding the selection of a preferred alternative and the ultimate Link light rail alignment. Our reasons are set forth below. They are also informed by the joint understanding we have with Sound Transit around testing, identification and resolution regarding impacts to sensitive receptors associated with the construction and operation of Sound Transit's University of Washington Station and future U District Station.

Vibration – As noted above, highly sensitive receptors to vibration are in very close proximity to the proposed Link alignment. The level and intensity of vibration on surrounding sensitive receptors from construction and operation of Link light rail due to proximity, depth, soil conditions, and other factors should be analyzed and demonstrated. Please note the variable soil and ground water conditions described below.

Electromagnetic Interference (EMI) - As noted above, highly sensitive receptors to EMI are in very close proximity to the proposed Link alignment. The level and intensity of EMI on surrounding sensitive receptors from construction and operation of Link light rail due to proximity, depth, soil conditions, and other factors should be analyzed and demonstrated.

Geology/Soils – Soil conditions greatly affect the ability to construct light rail (and its cost) and affect vibration and EMI. Light rail alignments have sometimes had to be moved later in the planning or design process due to the discovery of soil conditions. It is imperative that the soil conditions in this South Lake Union area (where the soils are known to be varied or poor and, in some places, contaminated) be thoroughly analyzed and well understood. Based on recent construction activities involving the UW Medicine buildings, we know the soil conditions are varied across the 750 and 850 blocks. Soils on the west side of the complex were comprised primarily of glacial till while soils on the east side were primarily loose fill as part of the Denny regrade. Contaminated soils were identified and removed as part of construction.

Construction Impacts – Impacts to sensitive receptors related to tunneling and station construction, proximity to significant construction truck trip pathways, and potential utility disruption should be analyzed and resolved.

Groundwater – Groundwater conditions can affect the ability to construct light rail and may result in long-term flow control issues. Based on recent work on the UW Medicine facilities, we know that groundwater elevation in the area generally ranges from 16 to 27 feet, which is approximately 20 to 30 feet below the first-floor building elevations. Parking and service levels in UW Medicine's buildings extend below the groundwater table.

Downtown Seattle

The University owns multiple contiguous parcels of land in downtown Seattle between Union and Seneca Streets between 3rd and 6th Avenues, including stretches of street right of way (the Metropolitan Tract). The University may pursue redevelopment of select properties within the Tract. Redevelopment could include below grade space that is deeper than what exists today.

Downtown ST Alignments

For these reasons, the section of the Green alignment shown as going under the Tract and the Purple alignment (the 5th Avenue route) should be avoided. The Brown alignment (the 6th Avenue route through downtown) would have the least potential impact on Metro Tract property use.

Scope of Impact Analysis Required

The same scope of impact analysis topics is recommended for this area of Downtown as listed above for the South Lake Union area with the addition of property ownership, utilities and right of way.

Thank you for your consideration of our concerns and comments. We appreciate the initial conversations we have had with Sound Transit staff and appreciate the opportunity to discuss these scoping issues with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Blakeslee", with a long horizontal flourish extending to the right.

Julie Blakeslee, AICP
SEPA and Land Use Officer
UW Facilities, Asset Management

jblakesl@uw.edu

Communication ID: 342954

From: Seattle Central College, Seattle Maritime Academy

Scoping Comment:

I am writing on behalf of Seattle Central College. We operate the Seattle Maritime Academy in Ballard adjacent to two of the alternative routes in the scoping document; the tunnel underneath the canal oriented along 14th and the elevated bridge option landing along 14th. The Maritime Academy maintains training vessels which traverse the ship canal and are docked directly adjacent to 14th Avenue. The placement of piers for the elevated bridge option is critical to our ability to run the Academy. If piers are too close to the approach and departure routes we will be unable to safely operate our training vessels. There is an additional concern over maintaining the navigable waterway once piers are placed into the ship canal. Because the existing Ballard Bridge must be opened for many vessels, ships frequently must stop and hold position awaiting the opening of the bridge. Holding position subjects vessels to wind, currents and wave actions which make maneuvering difficult at low power settings. Placing piers too close to the existing bridge has the potential to diminish the room for safe maneuvering.

Another concern which we would like to see addressed is the noise and vibration generated during construction and its potential to disturb instruction in the Maritime Academy's classrooms and instructional labs. We operate a highly sophisticated computer simulation lab at the Academy to teach students how to steer and operate vessels while underway. We would like some assurance that our racks of computers and associated display instruments will be able to function without disruption from underground tunnel vibrations during construction and subsequent operation of light rail trains. The same concern about vibration holds for the drilling and potential for pile driving should the elevated option be selected.

Finally, the original proposal for a low-level bridge to the west of the Ballard Bridge would pose a number of challenges for maintaining safe navigation on the ship canal. For larger vessels to proceed to and from the locks both bridges will need to open at the same time. We suspect that coordinating their openings will require more vessels to slow down or hold positions while waiting for the bridges to open. As described above, there are forces which make it difficult to hold a stationary position for a powered vessel in this location; the more vessels that have to maneuver around each other while awaiting an opening, the greater the likelihood of an accident.

We sincerely appreciate this opportunity to offer our input and we commend the Sound Transit staff for their openness in several meetings we have held with them to date. We look forward to continuing a dialogue on the best options available to extend light rail to the Ballard community.



March 28, 2019

West Seattle and Ballard Link Extensions
c/o Lauren Swift
Sound Transit
401 South Jackson Street
Seattle, WA 98104

RE: West Seattle and Ballard Link Extensions Scoping Comments

Dear Sound Transit and Federal Transit Authority Representatives:

We are writing on behalf of the Washington State Public Stadium Authority ("PSA") and First & Goal Inc. ("FGI"). The PSA is the public agency that owns CenturyLink Field and Event Center ("CenturyLink Field"), one of the two existing, publicly owned sports and events venues in the Stadium District south of downtown. FGI is the master tenant and operator of CenturyLink Field. CenturyLink Field hosts Seattle Seahawks games and Seattle Sounders FC matches, as well as more than 125 other events each year, drawing millions of patrons to the area.

The PSA and FGI are both eager for Sound Transit's proposed expansion of light-rail service through the West Seattle and Ballard Link Extensions ("WSBLE"). Many of our patrons utilize the existing light rail, as well as other transit services, to access CenturyLink Field during the myriad events and activities that occur at the facilities. We look forward to participating in your environmental review process to help ensure that the Sound Transit ("ST") and the Federal Transit Administration ("FTA") rigorously evaluate the potential environmental effects of the proposed WSBLE. We have highlighted the PSA's and FGI's principle concerns below.

I. Preferred Alternative

Although Sound Transit has fashioned three end-to-end alternatives from West Seattle to Ballard, the PSA and FGI are concerned only with the portion of the alternative routes proposed for 4th Avenue east of CenturyLink Field.

CenturyLink Field hosts roughly 200 events each year (some over multiple days) attended by approximately 2.25 million patrons annually. In addition to professional football and soccer, the facility hosts a wide variety of events including concerts, consumer shows, motorsport shows, trade shows, job fairs, meetings and community events. Eighteen to twenty thousand people also tour the facility annually. The large number of diverse events held annually at the facility range from a single day to several weeks and bring between a few

dozen and more than 69,000 patrons per event to CenturyLink Field throughout the year. Fourth Avenue is a primary access routes for those patrons coming and going from CenturyLink Field. Encumbering 4th Avenue for between 4 and 7 years with ongoing construction would significantly and adversely affect those patrons and the various events that occur at CenturyLink Field.

Earlier this year representatives of both the PSA and FGI met with ST representatives to better understand the proposed alternatives and to explain the potential effects of WSBLE construction on CenturyLink Field operations. As we discussed, 4th Avenue is a key component of the area-wide access plan developed by FGI in conjunction with the Seattle Police Department for event-related traffic. See Attachments 1 and 2. Although use of alternative modes of transportation is rising – and will hopefully increase further with the addition of the WSBLE – this past year, 48% of Seahawks fans continued to arrive by personal automobile, totaling an average of 13,421 cars per game. Many of those patrons, 58% of which come from outside King County and one quarter of which reside outside of the State of Washington, park in pre-assigned parking areas surrounding the Field, including the CenturyLink Field garage, the T-Mobile Park Garage, the surface lot north of CenturyLink Field, and several structured parking lots east of CenturyLink Field. As shown in the CenturyLink Field Egress Plan (Attachment 2), these parking garages and areas rely on 4th Avenue to provide direct and efficient routes to I-90 to the east and I-5 to the north and south.

Furthermore, event-related traffic is not limited to event attendees. Fourth Avenue also serves as a major access route for move-in/move-out of events held at CenturyLink Field. For example, the consumer shows – e.g., the Home Show, Boat Show, Auto Show and RV Show – occur throughout the year at CenturyLink Field. Each show generates roughly 30-40 deliveries by large semi-trucks in the 2-5 days preceding and following each event. For the RV shows, 450 RVs are driven to/from the facility. Furthermore, for stadium concerts (e.g., Taylor Swift, Beyoncé, and Ed Sheeran), the stage construction and associated set up typically rely on ~80 semi-trucks coming and going to CenturyLink Field in the days before and after the show. Finally, “motorsport shows” such as Supercross and Monster Jam typically involve transporting 500 truckloads of dirt to and from Centurylink Field.

Collectively, our patrons and event sponsors rely heavily on 4th Avenue for ingress and egress to CenturyLink Field. Any alternative that impairs that critical vehicular access is of grave concern to the PSA and FGI.

This analysis is supported by ST’s own data, which shows that more the 33,000 vehicles travel on 4th Avenue each day – even without an event at CenturyLink Field. By comparison, other alternatives being explored service less than 25% that volume of daily traffic. We encourage ST to select as its preferred alternative a route that avoids having a crippling effect on traffic in south downtown, and does not significantly and adversely affect operations at CenturyLink Field.

II. Topics of Study in the EIS

The WSBLE Scoping Information Report identifies several environmental resources categories likely to be evaluated in detail in the EIS. The PSA and FGI offer the following comments regarding several of these categories.

A. *Traffic/Transportation Impacts*

The event-related impacts triggered by a complete or partial, multi-year closure of 4th Avenue for construction of the WSBLE need to be thoroughly studied, including the traffic, operations, and economic impacts on CenturyLink Field, and its master tenant (FGI) and various subtenants (e.g., consumer shows, Sounders FC, Seahawks). Difficulty accessing CenturyLink Field – even just the perception of such difficulty – will adversely impact event attendance and profitability. This is particularly problematic for the consumer shows (e.g., Boat Show, Home Show, Auto Show, RV Show). For example, over 50% of the Seattle Boat Show exhibitors do the majority of their annual sales over the multi-day event. Construction traffic blocking prime ingress/egress routes to CenturyLink Field will deter patrons from attending these events.

In addition, as part of each alternative analysis, but particularly Alternative 3 (which relies on 4th Avenue east of the facility), the EIS should evaluate the effects of “cut through” traffic in both the Chinatown/International District (C/ID) and Pioneer Square. Average daily traffic (non-event related traffic) on 4th Avenue is estimated at 33,000 trips per day. Regardless of routes established by the City and ST to manage traffic during project construction, people will reroute into the adjacent neighborhoods to find the quickest routes to their destinations. Considering the number of trips affected by each route alternative, the 4th Avenue options appear to have the greatest traffic impacts on the adjoining neighborhoods.

B. *Acquisitions, Displacements and Relocations*

As PSA representatives explained to ST staff during our prior meeting, CenturyLink Field is required, as a condition of its Master Use Permit with the City, to provide a certain number of parking spaces surrounding CenturyLink Field for large events. Approximately 900 of those spaces are provided to the PSA through a parking covenant with the Union Station Garage at 550 4th Avenue South. Based on discussions with ST representatives, under Alternative 3 (the 4th Avenue route through the C/ID), this garage would be impacted. The EIS should consider the effects of eliminating parking spaces in Union Station Garage, including the availability (or lack thereof) of substitute spaces in the vicinity that CenturyLink Field could utilize to meet its permit conditions. Further, the ingress/egress to Union Station Garage is via 4th Avenue, exemplifying the access issues explained above.

C. *Geology and Soils; Air Quality; and Noise and Vibration*

Construction of the WSBLE through central Seattle, including SODO and the C/ID, is likely to result in significant impacts if not properly anticipated and mitigated. For example, construction noise and dust could interfere with the numerous outdoor/open air events at

CenturyLink Field. Further, construction of below grade tunnels, either by cut and cover or deep bore methods, can have effects on neighboring properties. This is why, during the construction of the SR 99 tunnel, WSDOT maintained continuous monitoring to ensure that its construction did not result in shifting soils in the vicinity of CenturyLink Field and other structures/operations in the area. ST and the FTA should evaluate similar monitoring conditions to ensure that its project does not inadvertently impact CenturyLink Field and other neighbors of its proposed route.

D. *Land Use*

The WSBLE Alternatives Development Report (February 2019) mischaracterizes the areas surrounding CenturyLink Field and T-Mobile Park. Specifically, as part of the “Level 3” analysis, the Report states that “SODO and Stadium station are within the Manufacturing and Industrial areas with less transit-supportive development and uses.” The area around the two public stadiums is currently designated “Stadium Transition Overlay” by the City, and there has been a joint effort by the City, the PSA and the Washington State Major League Baseball Stadium Public Facilities District (“PFD”) to establish a Stadium District from the south end of Pioneer Square south to Holgate Avenue South. This Stadium District would be a 24/7 hub of activity just south of downtown. It is important that the EIS properly characterize and analyze the effects of the construction and operation of the WSBLE on this burgeoning area. This area is an increasingly vibrant destination for residents and tourists alike, which is expected to increase with the pending development of the Seattle Waterfront Park and related amenities.

E. *Cumulative Impacts*

South downtown has been under near continuous development for the last several decades, most recently with the construction of the SR 99 tunnel and the Stadium Place and Embassy Suites/Avalara Hawk Tower developments along South King Street. More development is in the pipeline, including additional transportation improvements (Lander Street overpass), the development of the Seattle Waterfront Park, and the potential redevelopment of Pier 46. While these projects have increased the vibrancy of the area, they have also had a toll on residents and businesses in the area. It is important that ST and the FTA conduct a comprehensive cumulative impacts analysis, considering the potential effects of the WSBLE in the context of those prior and upcoming projects. In particular, the traffic analysis should consider the cumulative effects of past and upcoming construction and uses that are likely to further affect traffic patterns and congestion.

III. Mitigation Strategies

Developing appropriate and adequate mitigation to offset the impacts of construction of the WSBLE is a critical component of ST’s and the FTA’s work in preparing the EIS. The PSA went through an EIS and permitting process with the City of Seattle prior to constructing CenturyLink Field. The PFD went through a similar process prior to constructing T-Mobile Park. We encourage ST and the FTA to review those mitigation plans as part of its process of developing a mitigation plan for the WSBLE.

Key amongst the PSA and PFD mitigation plans, as well as the construction mitigation for other major construction projects in the area, have been requirements for outreach to and coordination with project neighbors throughout construction, including coordinating around significant events at both CenturyLink Field and T-Mobile Park. CenturyLink Field's Transportation Management Plan outlines several of the existing systems that are in place to assist with coordination between various projects, facilities and communities (e.g., Traffic Advisory Services, event scheduling/coordination, and construction coordination). ST and the FTA should also acknowledge and consider ways to ease the "construction fatigue" in the C/ID, Pioneer Square and SODO neighborhoods who have been burdened with nearly continuous construction projects for many years.

Thank you for your consideration of these scoping comments. The PSA and FGI look forward to continuing to engage with ST and the FTA as the environmental review process progresses. Once environmental review and permitting are completed, we look forward to working with ST during construction to minimize effects on CenturyLink Field and the surrounding neighborhoods. If you have any questions regarding these comments, please contact us.

Sincerely,



Ann Kawasaki Romero
Executive Director
Washington State Public Stadium Authority



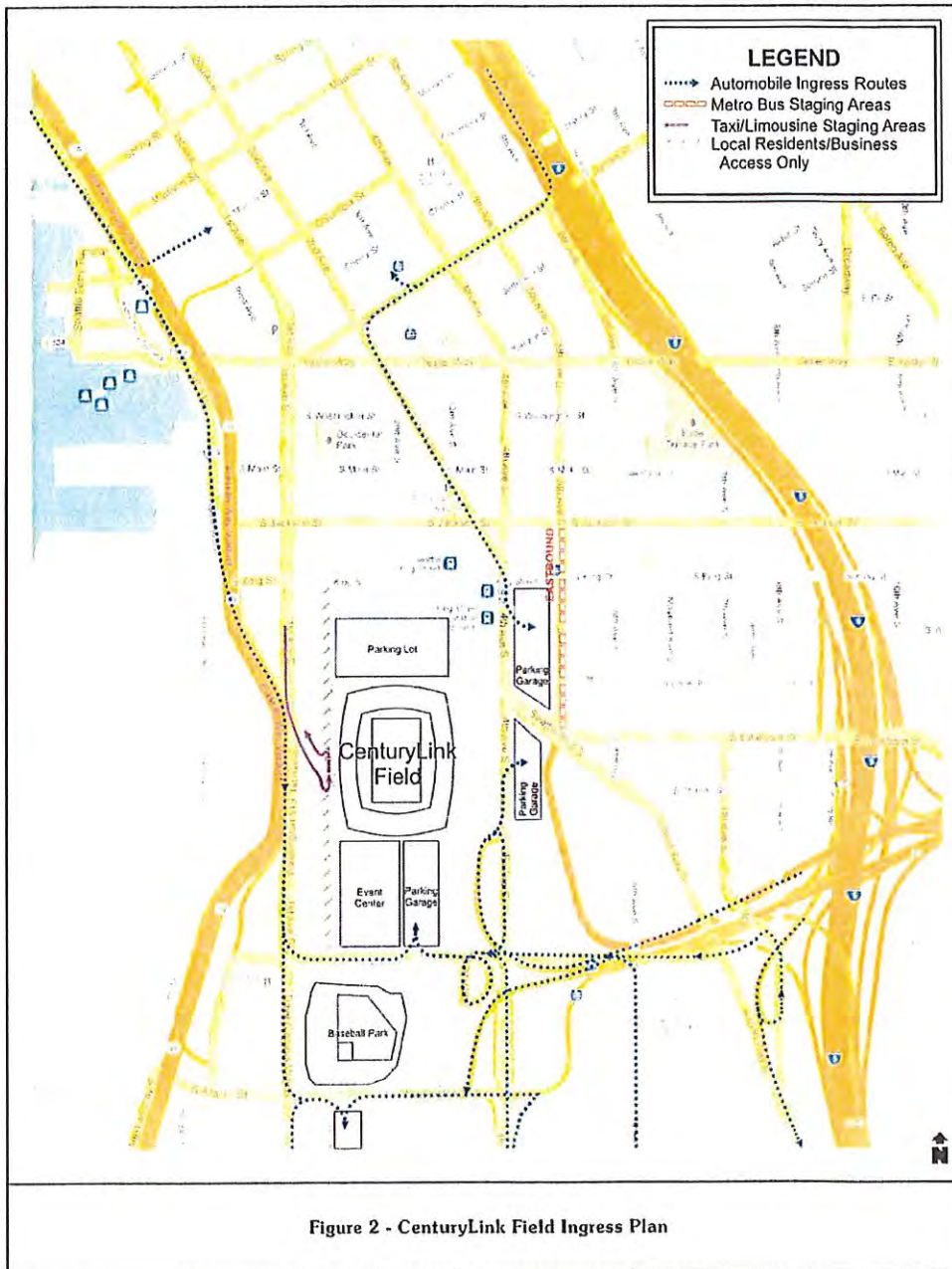
David Young
Sr. Vice President of Business Operations/
General Manager of CenturyLink Field
Seattle Seahawks/First & Goal Inc.

Enclosures

cc: Mr. Juan Rodriguez, Seattle Mariners
Mr. Kevin Callan, Public Facilities District
Mr. Peter Schrappen, Seattle Boat Show

Attachment 1

CenturyLink Field Ingress Routes*

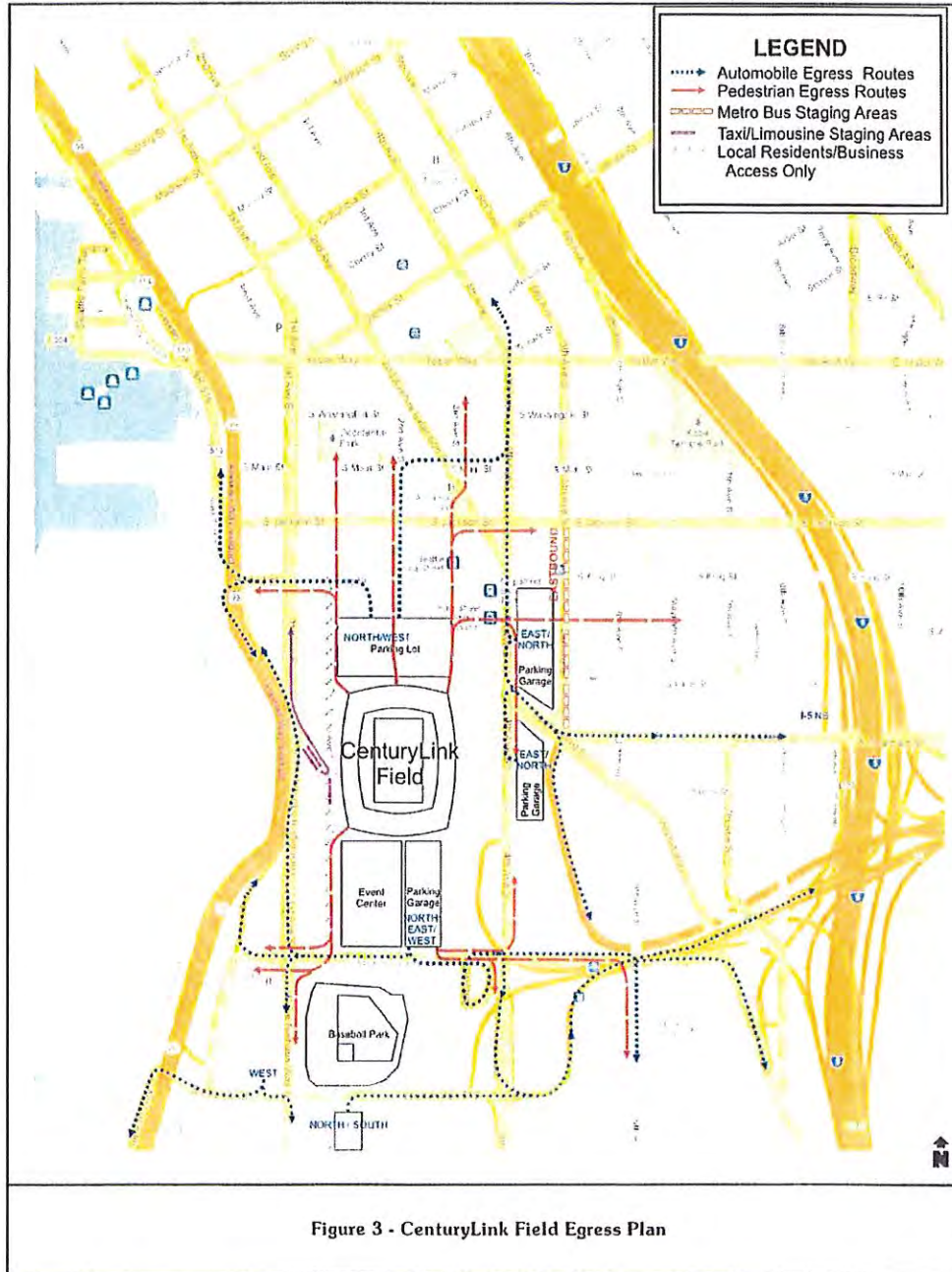


As shown above, 4th Avenue South east of CenturyLink Field plays a key role in the movement of patrons into Stadium and Event Center activities. The ingress plan is designed to minimize delay, maximize accessibility and discourage the encroachment of event vehicles into adjacent neighborhoods.

*This map is currently under redesign to eliminate the Alaskan Way Viaduct and include the new SR 99 Tunnel.

Attachment 2

CenturyLink Field Egress Routes*



The CenturyLink Field and Event Center egress plan for major events is designed with and enforced by the Seattle Police Department. Fourth Avenue South is the backbone that moves patrons out of our facilities and garages, onto the adjacent public transportation, freeway, and thoroughfare systems.

* This map is currently under redesign to eliminate the Alaskan Way Viaduct and include the new SR 99 Tunnel.



Priya Frank, Chair
Seattle Art Museum

Sharon Nyree Williams,
Vice-Chair
Central District Forum for Arts
& Ideas

Juan Alonso-Rodriguez
Artist

Cassie Chinn
Wing Luke Museum

Dawn Chirwa
Philanthropy Northwest

Jonathan Cunningham
Seattle Foundation

Steve Galatro
Pratt Fine Arts Center

Ashraf Hasham
The Vera Project

Jescelle Major
Berk Consulting

Dr. Quinton Morris
Seattle University

Chieko Phillips
4Culture

Nilofer Rajpurkar
Microsoft

Sarah Wilke
Meany Center for the
Performing Arts

**Facilities and Equitable
Development Committee,
Non-Commission members**

Kate Becker
Michael Blumson
David Bestock
Grace Chai
Sam Farrazaino
Andy Fife
Scott Plusquellec
Matthew Richter
Tana Yasu

April 1, 2019

City of Seattle members of the Sound Transit Elected Leadership Group:

Thank you for this opportunity to share our comments and recommendations on the Chinatown-International District (CID) station associated with the Sound Transit West Seattle and Ballard Link Extensions project. We appreciate the Elected Leadership Group's dedication to thoughtful, engaged, reflective dialogue and decision-making on this important moment in the history and life of our region.

As the Seattle Arts Commission, we are committed to ensuring the rich, vibrant arts and cultural life of the City of Seattle for all residents. The CID station lies in the heart of two historic neighborhoods – Pioneer Square and the Chinatown-International District – that are fundamental to the cultural identity of Seattle and our greater region. Pioneer Square and the Chinatown-International District are artistic and cultural destinations for our region and central hubs for our creative economy. Over several years, the Seattle Arts Commission has stewarded arts activation and creative placemaking at King Street Station as well; we recently celebrated its public opening and are excited for its continued role as a cultural anchor at the region's core transportation hub. The importance of these two neighborhoods, along with the need to protect the initial investment made by the City of Seattle at King Street Station, calls for continued care and thoughtfulness as the CID station is determined and developed.

As such, we would like to share the following perspectives on scope of the Environmental Impact Statement (EIS) for the CID station:

- *Long-view towards impacts and opportunities:* These over 100-year-old historic neighborhoods at the heart of one of the region's most active transportation hubs demand a 100-year perspective towards decision-making. Data and analysis from the EIS should take into account not only short-term impacts of construction but also long-term impacts (see scope under following Community Impacts) to the affected communities. Investment from this transit project also provides the unique opportunity to move forward integral visions the region has long had for this area.



- *Study of a Fourth Avenue alignment:* In this light, the Commission recommends that a Fourth Avenue alignment be included in the EIS. There has been a long desire to improve the above-ground pedestrian experience at and around Fourth Avenue, enhance intermodal transportation connectivity, and improve the public experience moving from Pioneer Square to the Chinatown-International District. The Fourth Avenue alignment provides the unique opportunity to make this entryway into Seattle a dynamic, engaging experience that sparks excitement and reflects the welcoming, creative, energetic region we truly are. A Fourth Avenue alignment also has the potential to better activate two significant historic, public properties – King Street Station and Union Station – which hold unrealized potential for local business enhancement, historic and cultural recognition and placemaking opportunities.
- *Center high risk of displacement for marginalized communities:* The Commission is highly concerned about the long-term destabilization of the Chinatown-International District and high risk of displacement that could result from the 5th Avenue alignment and the Link Extension overall. Racial equity should be a priority consideration in the analysis of the EIS and eventual selection of the station location and associated construction method. The Chinatown-International District has long been subject to impacts from public works projects – from the I-5 freeway, to the Kingdome, to another sports stadium and yet another sports stadium, to the Streetcar and more. Although the neighborhood has persevered through threat after threat, the region is under an unprecedented time of development and growth; the Chinatown-International District has been identified as under high risk of displacement; and the City of Seattle overall has prioritized protections against gentrification and displacement for just such marginalized communities. Short-term and long-term impacts, especially related to the potential displacement of residents and small business owners, should be evaluated during the EIS as well as through design, construction and operations related to the Link Extension.
- *Community Impact Study:* The EIS therefore needs to take into account racial, social and environmental factors in its study. We highly recommend taking an approach that analyzes the many components that contribute to community well-being within a racial, social and environmental justice framework: economic opportunity and commercial affordability; residential stability and affordability; local community character, cultural diversity and values, and cultural anchors and arts activation; community infrastructure and support systems; transportation mobility, connectivity and affordability; health and public safety; and equitable access to neighborhood amenities and housing and employment choices and community ownership overall.



Thank you for your consideration of our comments and recommendations. Your ongoing efforts to engage with communities and neighborhoods throughout this project – during this scoping process, through EIS, then onto project design and beyond – can only help to make the most of the exciting opportunity that the Link Extensions project can bring for all of our region's residents. We know that there are many more milestones for decision-making to come, and we look forward to working with you as the project continues. If you have any questions, please do not hesitate to contact Priya Frank, Chair, Seattle Arts Commission.

Sincerely,

Priya Frank

Priya Frank
Chair, Seattle Arts Commission

cc:

Sam Assefa, Director, Seattle Office of Planning and Community Development
Randy Enstrom, Director, Seattle Office of Arts & Culture
Anne C. Fennessy, Seattle Office of the Mayor
Sam Zimbabwe, Director, Seattle Department of Transportation
Carrie Avila-Mooney and Cathal Ridge, Sound Transit
Members of the Sound Transit Stakeholder Advisory Group

March 1, 2019

Mail West Seattle and Ballard Link Extensions
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Dear Ms. Swift:

Thank you for the opportunity to provide input on the scope of the Environmental Impact Statement analysis for the proposed West Seattle and Ballard Link Extensions.

As members of the Seattle Center Advisory Commission, we represent the interests of the people of Seattle by advising the Seattle Center staff, the Mayor and the City Council on policy matters that may affect Seattle Center. It is in this capacity that we are writing to inform the EIS analysis.

We strongly support the plan to extend light rail service and are thrilled to welcome the Link to the vicinity of the Seattle Center campus. Seattle Center welcomes millions of visitors to its campus each year. As the regional population continues to grow, Seattle Center and the attractions on its campus continue to thrive - and to provide more people with unique and special experiences. Seattle Center is located within the Uptown urban center, a designated Arts and Cultural District that is rich with residential communities and local businesses. In this environment, transportation challenges like those found in many other vibrant parts of Seattle are a daily reality. We – along with many of Seattle Center's patrons – are eager for an efficient transportation alternative that extends access to so many communities.

Our strong preference is for station locations at Republican St. on the west of the campus, and at Harrison St. on the east side of campus. These options, shown in the Level 3 alternatives analysis, have received strong support in community charrettes because they offer superior connectivity to other transit modes as well as access to Seattle Center campus attractions. Along with our Uptown neighbors, we strongly support a station design at 1st Ave N. and Republican St. that offers at least two exit options for Link riders: one exit onto the Seattle Center campus without the need to cross a street, and one exit into the Uptown neighborhood commercial core. We believe this station should have a name and identity that references both Seattle Center and Uptown. Locating a station entrance on August Wilson Way would meet the vision of the Seattle Center Century 21 Master Plan (adopted 2008) of using that corridor as a main pedestrian corridor that fluidly connects the campus to the surrounding neighborhood and aligns with major campus attractions including the Theatre District, International Fountain, and Memorial Stadium.

We suggest that the WSBLE EIS consider the following variables, to ensure a thorough examination of the potential impacts associated with light rail construction and operations:

- **Study potential opportunities to tunnel below the City-owned Seattle Center campus** in order to create alignments or station footprints that better meet the aspirations and needs of the project. Typically, the WSBLE project needs to stay within the right-of-way or enter private property; but this location offers an alternative that should be explored in discussion between Sound Transit and Seattle Center.

- **Large, event-driven flows of pedestrians that will use Link to arrive at Seattle Center for major spectator events and attractions:** In addition to the daytime crowds of people who access Seattle Center to enjoy arts and cultural attractions, public open space, and festivals, the campus is home to multiple performance, tourism and spectator event destinations. The largest of those venues, the redeveloped Seattle Center Arena, will reopen in 2021 to host professional sports and entertainment including the WNBA Seattle Storm and a NHL expansion team. It is our hope and expectation that thousands of patrons and employees will use Link to access Seattle Center for events, creating heavy flows of pedestrians in and out of the stations during the pre-event and post-event peak hours, and throughout festivals. Assumptions for Seattle Center attendance were included in the *Seattle Center Arena Renovation Project FEIS (August 2018)*. These assumptions or a reasonable proxy should be used in the WSBLE EIS to adequately analyze the expected flows of pedestrians during operations.
- **The schedule of recreational activities in the Seattle Center campus and Uptown neighborhoods.** These activities include large festivals and entertainment at Seattle Center such as Bumbershoot, Seattle Center Festál, Winterfest and Northwest Folklife Festival that could potentially be disrupted by construction activities. The arena renovation project, for example, is taking numerous measures by adjusting its construction fence, haul routes and noise generating activities; constructing a sound wall to contain construction noise; and contributing financial resources to a robust “open for business during construction” marketing campaign to minimize the impacts to these community-wide events, and we hope similar measures will be enacted for any WSBLE activities on the campus.
- **Inventory the pedestrian and bicycle connections** between the proposed station entrance/exits and Seattle Center campus and the Uptown neighborhood, including the condition of sidewalks, presence of good quality lighting, clear wayfinding, overhead weather protection, adequate signage and signalization, and opportunities to rest.
- **Inventory the uses of curb space around the Seattle Center campus,** as the area is heavily utilized by school buses and staging and loading for arts and cultural events for Seattle Center’s many resident organizations and events throughout the year. Without adequate communication and collaboration, closures of streets adjacent to the campus during construction could negatively impact arts and cultural institutions, events, and patrons by creating psychological and real barriers to accessing the campus.
- **Sensitivity of Seattle Center resident organization facilities near the target station location to noise and vibration from construction and operations:** The Seattle Center campus is home to several facilities considered sensitive receptors to noise and vibration because of the nature of their uses. Some of these facilities -- including the recording booth and live DJ booth at the KEXP station; the live performance venue at The Vera Project, the SIFF Film Center, and the performance venues at Seattle Repertory Theatre and Cornish Playhouse - are situated very near one or both of the locations being considered for a Seattle Center station.

- **Sensitivity of historic buildings and artworks:** Seattle Center is also home to a large number of designated landmarks, including the Century 21 Coliseum/KeyArena; the Northwest Rooms, International Fountain Pavilion, and International Plaza, and the Armory. Additionally, several more buildings on campus meet at least one of the Landmarks Preservation criteria for designation, but which have not yet been considered by the Landmarks Preservation Board. These structures and artworks are potentially vulnerable to damage caused by construction noise, vibration, dust/pollution or operations of the WSBLE. Sound Transit must be prepared to monitor and protect these assets during construction and operations.
- **Legacy trees:** Seattle Center is home to many trees that are designated “Legacy Trees” because of their unique or noteworthy characteristics or values. These trees are visible and noteworthy parts of the campus, and Seattle Center makes every effort to ensure they remain permanent features. Please reference the Seattle Center Century 21 Master Plan Landscape Guidelines for detailed description and recommendations regarding of Legacy Trees on the campus.
- **Please reference the following planning documents in your analysis:**
 - *Seattle Center Century 21 Master Plan* (2008)
 - *Uptown Urban Design Framework* (2016)
 - *Seattle Center Arena Renovation Project FEIS* (August 2018)
 - *Uptown Historic Resources Survey* (August 2018)
 - *Uptown Design Guidelines* (to be adopted in March 2019)
 - *Seattle 2035, Comprehensive Plan*

We thank you for the opportunity to provide comments on the scope of the EIS analysis. We look forward to ongoing collaboration with Sound Transit throughout the planning, construction, and operation of the WSBLE Seattle Center and SLU stations.

Regards,

Seattle Center Advisory Commission:

Maria Barrientos	Will Ludlam
Gloria Connors	Donna Moodie
Mark Dederer	Sarah Rich
Alayne Fardella	Raquel Russell
Holly D. Golden	Samuel Russell
Jana Lamon	Daniel Tam-Claiborne
Todd Leber	

cc: Robert Nellams, Director, Seattle Center Department, City of Seattle

Communication ID: 351566

From: Seattle Design Commission

Scoping Comment:

The Seattle Design Commission would like to offer the following comments on the EIS scoping of the West Seattle to Ballard Link Extension. We provided early scoping comments in March 2018. We also contributed to the scoping letter of the City of Seattle that will be submitted separately. We are sending this email for emphasis and to expand on previous comments. We have kept our comments brief and invite Sound Transit staff to meet with us to discuss and receive clarification as needed.

Alternatives Evaluation, Development and Mitigation

Do not include the representative alignment alternative in the DEIS because it contains elements that are not viable and perform poorly in relation to the other alternatives according to ST's own metrics. Resources should not be spent on studying system elements, such as an operable bridge, that cannot meet program requirements.

Evaluate the feasibility of a consolidated multi-modal hub for the Chinatown/ID station.

Evaluate the feasibility of joint developments with the Delridge and West Seattle Junction stations.

Include the Pidgeon Ridge (purple) alternative in the DEIS.

Provide evaluation and present information on the various project delivery methodologies that may be employed to build the project/s. Explain how they deliver on the urban design outcomes that are set by the community and City leadership in the pre-concept, and concept design phases. Provide information on the time and cost savings, as well as risk mitigation of the delivery methods. The project delivery method should factor into the choice of alternatives because some methods may be more appropriate for certain structures than others.

Building the CID station on either 4th or 5th Avenues will have very large impacts on this fragile community that has disproportionally been affected by large infrastructure projects that have large regional benefits but minor locally focused benefits. Mitigation of these impacts to reduce gentrification and displacement must be a major priority.

Measures of culture, community, and equity for historically disadvantaged populations must be weighed equally to cost implications and effects on business and industry concerns. Alternatives that align with the concerns of the disadvantaged groups within the CID and Delridge neighborhoods should be elevated in the same way that the concerns for the Port, Ballard, South Lake Union, and Smith Cove are accounted for.

Visual and Aesthetic Resources

In assessing the visual and aesthetic impacts of the proposed alternatives, use the Guidelines for the Visual Impact Assessment of Highway Projects from the Federal Highway Administration. Use the

most advanced and useful methods of visualizing alternatives so that experts and laypeople can provide informed input.

Provide for substantive and meaningful input on the pre-concept designs by the SDC, elected leaders, and the public before a preferred alternative is selected.

Land Use

Evaluate which additional station locations hold the potential for joint development and/or TOD on the station sites or near them. This should include economic development studies.

Include scenarios in the evaluation of station alternatives that assume increased land use intensities and land use typologies that increase ridership, in particular in industrial areas.

In evaluating potential for joint development and TOD, prioritize stations with a high number of riders and transfers and to maximize equitable TOD.

Transportation

Provide a comparative analysis of 1) replacing the 4th Ave viaduct while constructing the Chinatown/ID station, and 2) replacing it at a later date after the light rail facility has been completed. Additionally, along with the studying of constructing standalone structures for the 4th Ave viaduct and the new “cut and cover” CID station, analyze the feasibility of building an integrated 4th Ave viaduct and CID station to reduce impacts and potentially improve structural performance.

Analyze first/last mile opportunities for each station. Confirm prioritization of modes. For example, will “kiss and ride” have a higher priority than pedestrian facilities.

Study station sizes, locations, and configurations that reflect need for future expansion and increased system use.

Evaluate which stations will include restrooms and transit supportive retail and services.

Thank you for the opportunity to provide comments to guide the scoping of the EIS of this important project.

Sincerely,

Ben de Rubertis

Chair, Seattle Design Commission



City of Seattle

Jenny A. Durkan, Mayor

**Seattle
Freight
Advisory
Board**

March 29, 2019

Jeanne Acutanza, Chair

Johan Hellman

Geri Poor

Frank Rose

Pat Cohn

Dan McKisson

Mike Elliott

Kristal Fiser

Warren Aakervik

Todd Biesold

Kris DeBuck

The Seattle Freight Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the City in development of a functional and efficient freight system and on all matters related to freight and the impact that actions by the City may have upon the freight environment.

City Council Resolution 31243

WSBLE

c/o Ms. Lauren Swift, Central Corridor Environmental Manager

Sound Transit

401 S. Jackson Street Seattle

WA 98104-2826

(delivered via e-mail: WSBscopingcomments@soundtransit.org)

Dear Ms. Swift:

Re: NEPA/SEPA Scoping Comments from Seattle Freight Advisory Board
Sound Transit 3 West Seattle Ballard Link Extensions (WSBLE)

This letter reflects the comments of the City of Seattle Freight Advisory Board (SFAB) regarding the NEPA/SEPA scoping and purpose and need for the Sound Transit 3 West Seattle Ballard Link Extensions (WSBLE). The SFAB was founded by Seattle City Council resolution to advise the mayor, council, and city departments on matters related to freight and the impact that various activities may have on our freight environment.

We appreciate the project briefing given to SFAB on February 19, 2019. In accordance with the WSBLE NEPA/SEPA process, we are submitting these scoping comments on the alignment alternatives and general environmental impacts for your consideration.

In general, we support the purpose and need of the project, which is to provide high-capacity transit (HCT) for Seattle-area travelers. In addition to improving non-auto mobility, we encourage the project to protect and enhance freight movement in the region.

COMMENTS ON ELEMENTS OF THE ENVIRONMENT

Minimize Negative Freight Mobility Impacts

Freight movement – like HCT – is a critical component of Seattle's transportation system. Potential effects of this light rail project on Seattle's freight system must be identified and evaluated in the environmental review. The 2016 Seattle Freight Master Plan identifies the freight network for trucking activity on city arterials and streets, designating 'limited access', 'major truck', 'minor truck', and 'first-/last-mile connector' streets. Please identify potential construction and operating impacts on this network, especially in and between Seattle's two Manufacturing/Industrial Centers (MICs). Please specifically consider and identify the effects that buses leaving the E-3 busway will have on SODO arterials and the effects the project may have on 15th Avenue W and Elliott Avenue W, which serve the Ballard MIC.

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Tel: (206) 684-4103 Tel: (206) 684-5000 Fax: (206) 684-5180

Web: www.seattle.gov/sfab/

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Minimize Construction Impacts

We understand that light rail construction is a complex, multi-year project and that construction impacts are temporary. That being said, these temporary impacts may be extremely disruptive to goods movement. In the MICs in particular, freight facilities operate throughout the day, and often in off-peak times. Trucks serving these MICs are long, wide, and heavy, and require large turn paths. Construction that occurs outside peak hours and occupies travel lanes - especially within the MICs - should be identified in the environmental review for mitigation of negative impacts and coordinated with freight interests well in advance. Potential negative impacts include increasing conflicts between freight and vulnerable travelers (non-motorized modes), particularly in MICs and along freight priority corridors.

Freight operates in very confined spaces in downtown Seattle. Please address, as part of project impacts, the need for delivery space in downtown. Please identify the need for light rail construction teams to coordinate with other, non-light rail construction operations to maintain adequate on-street and/or alley freight operations space throughout the project.

Boring (or mined) tunnel construction is preferred if it can be shown to reduce freight access restrictions and roadway closures. A cut-and-cover construction method would likely be far more disruptive.

For construction near navigable waterways, consider use of barges for hauling and construction. This may reduce the congestion, pollution, and noise impacts of construction trucks on city streets and the freight network.

Minimize Negative Economic Impacts

Freight movement – by water, rail, air, and road – is critical to our regional economy. Washington is one of the most trade-dependent states in the nation; freight-related industries support 1.46 million jobs and \$128.8 billion in domestic products statewide. Roughly 40% of all jobs in our state can be tied to trade-related activity. In the Puget Sound region, freight-dependent industries support almost 900,000 jobs and \$91.9 billion in domestic product. The two MICs in Seattle employ nearly 75,000 people, primarily in family-wage jobs.¹

Efficient freight movement is essential to this economic engine and to the family-wage jobs it provides. The West Seattle and Ballard light rail alignments will impact both of Seattle's PSRC-designated MICs. Impacts to freight and industrial/maritime operations in these MICs must be evaluated in the economic impact assessment in the environmental analysis. Considerations in this evaluation should include the value of freight to our economy in terms of urban deliveries/pickups, industrial and international imports/exports, and light rail's likely impacts to this value, during both construction and operation.

¹ Source: Seattle Industrial Areas Freight Access Project, May 2015

COMMENTS ON ALTERNATIVES

Alternative 1, Representative Project

This alternative would have significant effects on major truck streets, endangering freight movement. In particular, the Ballard Interbay North Manufacturing/Industrial Center (BINMIC) would be affected, as the proposed alignment travels along 15th Avenue W, cuts through the Port of Seattle's Fishermen's Terminal, and interrupts marine cargo movement on the ship canal with a mid-height movable bridge. We do not believe the construction and operational effects of this alignment could be mitigated.

Both 15th Avenue W and Elliott Avenue W are major truck streets that also transport hazardous materials. Locating guideway columns along these roadways needs to address the impacts to freight.

The location of the proposed Smith Cove station on Elliott Avenue W will increase pedestrian and bicycle traffic across Elliott Avenue W, even if a grade-separated option is provided. Increased crossings will impact this major freight route.

Alternative 2, West Seattle Elevated / C-ID 5th Ave / Downtown 6th Ave / Ballard Elevated Alignment

Crossing the Duwamish Waterway south of the West Seattle Bridge will have significantly less impact on freight circulation and access to Harbor Island freight terminals and industrial facilities.

Please provide more information on how the tunnel under Elliott Avenue W would be constructed. This undercrossing appears to have less of an operational impact than an aerial crossing, which is shown in Alternative 1.

In Interbay, this alignment follows BNSF's Balmer Yard tracks. Please evaluate how this at-grade alignment would limit future spur line access to land between the railyard and 15th Avenue W.

Please identify the potential effects of constructing and operating a bridge over the Lake Washington Ship Canal, including impacts on marine navigation and maritime business access (both via road and water). Please recognize that many businesses on the ship canal are completely dependent upon water access and may not be able to re-establish their activities if forced to relocate.

Alternative 3, West Seattle Tunnel / C-ID 4th Ave / Downtown 5th Ave / Ballard Tunnel

By crossing the Duwamish Waterway north of the West Seattle Bridge, there will likely be significantly greater impacts on freight circulation and industrial operations, considering the surface roads below (SW Spokane Street and Klickitat Avenue). These roadways provide access to freight origins and destinations on Harbor Island, including the Port of Seattle's Terminal 18 and other private terminals and shipyards.

Please evaluate impact to freight traffic as this alignment enters downtown on 4th Avenue S, and how a cut-and-cover tunnel would compare with a mined tunnel during construction.

Our comments on Alternative 2 regarding the relationship of the proposed light rail guideway to BNSF Balmer Yard, Elliott Ave W, and 15th Avenue W are also concerns for this alignment.

COMMENTS ON PURPOSE & NEED STATEMENT

Overall, we support the purpose and need statement, yet recommend that the project statement acknowledge that it crosses through our city's two PSRC-designated industrial zones (MICs). We feel strongly that where these Link extensions pass through MICs (Duwamish and Ballard-Interbay), planning and construction respects the vitality and regional economic contributions of these areas. Seattle's MICs have developed over time with synergistic land uses and transportation systems that support freight access and mobility. As this project moves forward, increased transit passenger mobility must be balanced with industrial capacity and capability. In this context, it is essential to note that:

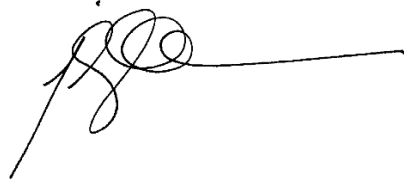
- Existing freight mobility (for all modes: road, rail, marine, etc.) must be maintained and the project designed so as to not preclude future development of freight infrastructure
- MIC employment densities are inherently lower than those in other regionally- and locally-designated centers
- Traditional transit-oriented development (TOD), which typically includes housing and ground floor commercial, is inappropriate in MICs

The current 'need' section includes six bullet points. We recommend these reflect the important differences of station areas in the MICs. Please consider the following underlined addition to bullet six:

- Regional and local plans call for increased residential and/or employment density at and around most high-capacity transit (HCT) stations, where consistent with local zoning.

We look forward to working with Sound Transit to address impacts to freight as part of the environmental documentation and we appreciate Sound Transit's efforts to reach out to City of Seattle advisory boards.

Sincerely,



Jeanne Acutanza
Chair, Seattle Freight Advisory Board



City of Seattle

Seattle Planning Commission

March 25, 2019

WSBLE

c/o Lauren Swift, Central Corridor Environmental Manager

Sound Transit

401 S. Jackson Street

Seattle, WA 98104-2826

(delivered via e-mail: WSBscopingcomments@soundtransit.org)

Dear Ms. Swift:

The Seattle Planning Commission is a 16-member independent, volunteer advisory body. We provide guidance and recommendations to the City of Seattle Mayor and City Council, as well as City departments on planning goals, policies and plans for the physical development of the City. We are pleased to submit the following scoping comments and recommendations on Sound Transit's West Seattle and Ballard Link Extensions project. The Planning Commission is very supportive of this project and recognizes that Seattle's growth necessitates a significant investment in transit. We offer comments on alternatives to be studied in the Environmental Impact Statement (EIS), recommendations regarding individual impacts to be evaluated, and salient observations pertaining to individual project segments.

Overarching Recommendations

- The Commission strongly urges Sound Transit to evaluate the benefits and impacts of the proposed West Seattle and Ballard Link Extensions through a lens that considers a hundred-year horizon, well beyond the short-term construction timeline for this project.
- We encourage Sound Transit to remove the Representative Project from consideration as an alternative to be studied in the Draft EIS. We recognize that this conceptual alignment was included in the ST3 ballot measure. However, the extensive feedback and analysis conducted since make it clear that changes are necessary for the project to meet the intended purpose and need.
- We endorse the intention to study both a "fully funded" alternative and others that could require third-party funding. While a need for third-party funding should be identified where relevant, preliminary cost estimates should not be used to eliminate alternatives or station options.
- We encourage studying mix-and-match combinations of the best potential alignments.

Commissioners

Michael Austin, *Chair*

Patti Wilma, *Vice-Chair*

Sandra Fried

David Goldberg

Veronica Guenther

Grace Kim

Rick Mohler

Tim Parham

Marj Press

Kelly Rider

Julio Sanchez

Amy Shumann

Lauren Squires

Jamie Stroble

Staff

Vanessa Murdock
Executive Director

Connie Combs
Policy Analyst

John Hoey,
Senior Policy Analyst

Robin Magonegil
Administrative Analyst

Land Use Impacts

The Planning Commission serves as the steward of Seattle's Comprehensive Plan. This Plan and its Future Land Use Map reflect Seattle's adopted vision for managing growth.

- Please include in the Draft EIS a map of properties affected or acquired for purposes of construction, staging, and ancillary facilities.

Transit-Oriented Development

- To maximize the transit investment, the Commission expects to recommend zoning and policy changes to encourage density and affordable mixed use in and around station areas. The land use and economic development analyses in the EIS should take this into account. The EIS should recognize the potential for transit-oriented development that may require updates to the Comprehensive Plan's Future Land Use Map and/or zoning changes in the vicinity of any station areas.
- The Commission would appreciate the opportunity to review the methodology to be used for quantifying potential transit-oriented development around all station areas.

Industrial Lands

- The Commission desires that any preferred alternative(s) will minimize or avoid impacts to the long-term viability of Seattle's industrial lands. To that end, we request robust analysis of potential displacement of industrial businesses, impacts to freight corridors, and the resulting short- and long-term economic, transportation, and construction effects.
- Please evaluate the potential for transit-oriented development and associated ridership both with a continued industrial designation and with zoning that anticipates residential and commercial uses. As one basis for that analysis, please begin with lessons learned from the location and use of the existing SODO station.

Race and Social Equity Impacts

- We are encouraged that Sound Transit has partnered with the City of Seattle on the application of the Racial Equity Toolkit. The Commission recommends continued partnership and rigorous assessment of the racial equity impacts when analyzing station locations and alignments that bring disproportionate short- and long-term impacts to the affected communities. Use analyses in the EIS to select a final alignment whose cumulative benefits do not come at the expense of communities experiencing historic and current inequities.
- Other considerations besides cost, including service to vulnerable and historically underserved populations, should inform the decision to have elevated, surface, or underground alignments.
- The Commission would appreciate the opportunity to review the methodology to be used for analyses of displacement and environmental justice. We recommend incorporating data and themes from the City of Seattle's Equity Analysis and Equitable Development Initiative.
- While negative impacts may be experienced along all alternatives and alignments, we urge you to pay particular attention to identifying and avoiding these impacts in the Chinatown/International District (C/ID) and Delridge neighborhoods. Where necessary, identify mitigation measures that meet the long-term needs of those communities.

Aesthetic and Quality-of-Life Impacts

- The Commission recommends studying the qualitative impacts of all guideways of a significant height, potentially up to 160 feet high. These high guideways and the associated station platforms present accessibility and safety challenges, as well as significant visual and quality of life impacts to the communities these alignments will traverse.
- The existing images provided by Sound Transit do not sufficiently demonstrate the anticipated cumulative effects of the elevated guideways and stations. Additional modeling and visualizations, especially from a ground-level pedestrian perspective, are essential to understanding the potential impacts of these alternatives. We suggest using the latest and best visualization technology and methods, including photorealistic 3-D imagery.
- We recommend identifying all short- and long-term impacts to view corridors.

Access to Stations

- We recommend conducting an access assessment at all station areas, including at-grade, elevated, and tunnel stations. This analysis should consider topography, land use, and pedestrian networks. Sound Transit should make the system user-friendly, including ease of transfers and access to destinations after leaving the stations.
- Study and identify any potential barriers to achieving universal accessibility for those with disabilities, mobility challenges, and other special needs such as strollers. Station entrances should allow multiple entries to serve both ends of stations, especially in areas with different grades.

Site-Specific Considerations and EIS Scoping Recommendations

West Seattle/Duwamish Segment

Alaska Junction

- The terminus station at the Alaska Junction must be sited and designed to best meet the needs of existing and future land uses in the vicinity.
- We recommend studying any potential economic and visual impacts associated with elevated guideways and station platforms in the historic Alaska Junction commercial district.

Delridge

- Please quantify the potential for future development surrounding the various station options, including equitable transit-oriented development and affordable housing. Study bus integration and multi-modal opportunities at each station location.
- We recommend studying visual impacts and access issues at this location. Alternatives with higher elevated alignments and station platforms would negatively impact the quality of life for those who live and work in the Delridge community, particularly to people with disabilities.
- We recommend a rigorous analysis to identify, minimize and avoid commercial and residential displacement resulting from guideway and station construction. We request an assessment that describes the ability and likelihood of any potentially affected property owners to relocate within the same area.

Duwamish Crossing

- We recommend studying fish and wildlife, economic, environmental (specifically sea-level rise), and transportation impacts. It is also of critical importance that Sound Transit consult with any affected tribes, including the Duwamish Tribe, to identify, minimize, or avoid impacts to cultural resources. The Planning Commission supports a bridge alignment crossing the Duwamish River that balances cost while limiting impacts to the Duwamish Greenbelt and maritime industrial operations.

SODO and Chinatown/ID Segment

SODO

- The Commission encourages the study of alignment options that eliminate the need for an interim transfer at SODO for West Seattle riders while the Ballard extension is being built. If an interim transfer is a necessity, we have concerns about the pedestrian connectivity between the existing and new stations. Study the potential for consolidating stations (for the short- and long-term) at this location and improving pedestrian access.
- We recommend a rigorous assessment of future ridership at this station. The existing SODO and Stadium stations have demonstrated low ridership numbers, and we question the need for a new station in this segment. Additional stations should only be created if potential new development and employment in the SODO neighborhood indicate potential for increased ridership.
- Please study the impacts to bus routes using the E-3 busway.

Chinatown/International District (C/ID)

- The Commission feels strongly that equity needs to be a priority consideration in the analysis and eventual selection of a new C/ID station location, and the associated construction method. This historic, culturally significant neighborhood has been traditionally underserved, and repeatedly subjected to disruptive capital improvement projects.
- Study construction-related short- and long-term effects including displacement, environmental justice, and economic impacts related to small business disruptions.
- Quantify both the potential short-term and long-term economic impacts resulting from cut-and-cover construction on 5th Avenue S, given the equity concerns associated with this construction method in the C/ID.
- As an alternative to the 5th Avenue S location, the Planning Commission endorses the study of a 4th Avenue S alignment and station location employing a cut-and-cover construction method.
- We do not support further consideration of the deep-mined station options on either 4th or 5th Avenues. These options would limit ease of connectivity between stations. Furthermore, they would require elevators for station access (the lack of escalators at a significant regional transportation hub raises safety concerns).
- We recommend a rigorous assessment of several topics related to development of a new C/ID station:
 - Ease of station access and pedestrian connections between the existing and new tunnel stations;
 - Multi-modal connections, including bus, streetcar, and non-motorized options, as well as Sounder and Amtrak trains at King Street Station;
 - Impacts to automobile and bus traffic on both 4th and 5th Avenues;

- Benefits of activating Union Station as a vibrant regional multi-modal hub, including local business enhancement, historic and cultural recognition, and placemaking opportunities.

Downtown

- Assess pedestrian access to the proposed Midtown stations, including topography and distance from the existing transit tunnel stations.
- Study ridership and transit integration at the proposed South Lake Union stations. Harrison Street is a significant east-west transit corridor. This station represents a multi-modal opportunity to maximize transit ridership in a rapidly growing neighborhood.

Interbay/Ballard Segment

Smith Cove-Interbay

- The Commission recommends prioritizing further study of the Smith Cove station location closest to Terminal 91, as that location has better transit-oriented development potential than station locations further south on Elliott Avenue W.
- Study ridership, transit integration, and non-motorized/pedestrian access at the proposed Smith Cove station locations.
- We also recommend studying the risk of sea level rise around any proposed Smith Cove station including the Armory site and areas to the south.
- The Commission recommends analyzing the potential for transit-oriented development at each of the proposed Interbay station locations, as land use in Interbay has the potential to change with station siting. (For example, future development in this area could lead to a new urban village on either side of the Dravus Street bridge, including the lower east slope of Magnolia.)

Salmon Bay Crossing

- The Commission recommends eliminating a movable bridge and any bridge alternatives adjacent to 15th Avenue NW from further consideration. A bridge at this location would be disruptive to operations at Fishermen's Terminal.
- Study the impacts associated with any bridge structures over Salmon Bay, including impacts to navigation, maritime and industrial businesses, water resources, fish and wildlife, and aesthetics.
- We recommend evaluating the potential for a new multi-modal bridge serving light rail, bikes, and pedestrians.

Ballard Terminus

- The Commission recommends for further study the alternatives with a Ballard terminus on 14th Avenue NW. This location offers a wide right-of-way, provides opportunities for transit-oriented development in the station vicinity, and would be less disruptive (e.g. fewer property acquisitions) than the 15th Avenue NW alternatives. Please study potential economic impacts, including displacement, to industrial land uses in the Ballard/Interbay/Northend Manufacturing and Industrial Center immediately to the south of the proposed 14th Avenue NW station location. We also request analysis of the viability of extending the line to the north of this station.

- We recommend evaluating transit integration and non-motorized (bike/pedestrian) access at each of the proposed station locations.

Thank you for your consideration of our comments. If you have any questions, please do not hesitate to contact me or our Executive Director, Vanessa Murdock, at 206-733-9271.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Austin', with a stylized flourish extending to the right.

Michael Austin, Chair
Seattle Planning Commission

cc:

Seattle Mayor Jenny Durkan
Seattle City Council President Bruce Harrell; Seattle City Councilmembers Sally Bagshaw, Lorena Gonzalez,
Lisa Herbold, , Rob Johnson and Mike O'Brien,
Anne C. Fennessy



TAB Members:

Keiko Budech
Marci Carpenter
Enjoleah Daye
Lynn Hubbard
Jennifer Malley-Crawford
Andrew Martin
Alexandra Wakeman Rouse
Carla Saulter
Lucas Simons
Erin Tighe
Barbara Wright
Michelle Zeidman

*The Seattle Transit Advisory Board shall **advise** the City Council, the Mayor, and all departments and offices of the City **on matters related to transit** and the possible and actual impact of actions by the City upon all forms of public transportation.*

*The Board shall be provided the opportunity to comment and make recommendations on City policies, plans, and projects as they may relate to **transit capital improvements, transit mobility, and transit operations** throughout the City...*

*The Board shall help facilitate City policies, plans, and projects that support local and region-wide transit mobility efforts, to help **ensure a functioning and coordinated transit system** throughout the City and region.*

*The Board shall function as the **public oversight committee of revenues collected under Seattle Transportation Benefit District (STBD) Proposition 1**, as described in Resolution 12 of the STBD...*

The Board shall make an annual report to the City Council on the status of its work program and the achievement of its goals.

*City Council Resolution
31572*

Date: March 11, 2019

To: Members of the Seattle City Council, the Elected Leadership Group, and the Sound Transit Board

Subject: West Seattle-Ballard Link Extension Scoping Letter

The Seattle Transit Advisory Board has received several briefings on the proposed system plans for the West Seattle and Ballard Link extensions. After careful consideration, we give the following suggestions to create a preferred alternative designed for optimal rider experience that sites stations close to large populations and popular destinations, minimizes travel times and system disruptions, and focuses on the possibility of future system expansion to bring high capacity transit to more neighborhoods.

In all of our suggested station placements, there are design principles that will create a better rider experience. Stations should have multiple entrances that bridge pedestrian barriers like busy roads. Stations should have sufficient, effective, and reliable vertical conveyance so that the station itself does not become a barrier to accessing transit. Sound Transit should maximize transit-oriented development potential by minimizing the street-level impact of station entrances and engineering stations that can carry the weight of large buildings immediately above them.

We have not called out every station placement in this letter; for some stations the options lack much difference, and others are dictated by the more important concerns outlined below. As an advocate for transit riders experiences we recommend that the Sound Transit board make the following alignment choices:

Ballard/Interbay Line

- **Ballard Station at or West of 15th Ave:** A 14th Ave NW station placement adds 3 minutes of extra walking to reach the Ballard commercial core and would put much of the Ballard Urban Village more than 10 minutes of walking from the station. Bus connections on 15th and Market are also much better as both north-south and east-west bus lines run on these streets. This location is also better suited to further northward expansion as an extension up 14th Ave NW to Crown Hill would run into Ballard High School while extending up 15th Ave NW would not.

- **Ship Canal Crossing should be Tunneled:** A movable bridge has service disruptions that degrade the speedy and reliable service Link should provide. So, only a tunneled crossing or a fixed bridge are real options. Tunneling is superior to a fixed-bridge as an underground station would make future expansion north and transfers to a (likely tunneled) east-west Ballard to UW line much better. A tunnel under Salmon Bay is only \$100M more than a fixed bridge but that buys a lot of rider and network benefits while minimizing neighborhood impacts.
- **Smith Cove at Galer St:** We agree that an optimal Smith Cove Station would integrate with the existing Helix Bridge over the BNSF tracks, but this is not one of the line's important stations. The station should be sited where unstable hillsides and uncertain engineering don't increase the price of the station. Galer St is an acceptable alternative.

Downtown Line

- A **Seattle Center/Uptown Station** centered at Republican and 1st Ave N effectively serves both the activity center of Uptown and the crowds that attend major Seattle Center events.
- **State Route 99 Station** would optimize pedestrian access and transfer potential sited at Harrison.
- A **Denny Way Station** that has been shifted south along Westlake Ave to accommodate the turn to 99 and Harrison also has the advantage of better serving the population centers in Denny Triangle.
- **Westlake Station** is one of the most important stations in the system. A transfer between the two lines here is instrumental to the successful bifurcation of the current Link line; to make transfers as seamless as possible, we suggest the 5th Ave alignment.
- **Midtown Station** sited at 5th and Madison will serve both the growing commercial district in the middle of downtown and the planned RapidRide G line (to which Sound Transit is contributing money).

Chinatown/International District and SODO Line

- **Chinatown/International District** is unfortunately a station with few good options. In choosing a station site, we believe that Sound Transit should opt **against** a deep bore station to improve surface accessibility to the wealth of other transit options in the neighborhood. Beyond that we can only recommend focusing on mitigating the impacts to historically disadvantaged populations. The International District has borne the brunt of many large infrastructure projects, and we would like to see the community involved as much as possible.
- **The Tunnel Portal** should be located to minimize impacts on King County Metro bus bases and operations. The best way to benefit riders in this corridor is to allow their buses to continue efficient function during and after ST3 construction.

West Seattle Line

- **Delridge Station** should be sited as far south as possible to maximize accessibility for population centers farther south on Delridge.
- **West Seattle Junction Station** should be located as close to California Ave SW and SW Alaska St as possible; we particularly like the options for 44th Ave SW 42nd Ave SW. The options minimize walking times up steep hills to the heart of the Junction neighborhood, home to both denser housing and retail/service destinations. This station should also be oriented north/south, to prepare for possible future expansion southward toward Burien.
- **A tunnel to West Seattle does not benefit Link riders:** A West Seattle Tunnel does not seem to have any major transit service quality or station placement advantages over an elevated option but is quite expensive at \$700M. We do acknowledge though that if our preferred North-South alignment for the West Seattle Junction station is chosen, then an elevated option will require the demolition of blocks of housing and will have non-trivial neighborhood impacts, but we feel that this is far outweighed by the hefty price tag.

Sincerely,

Seattle Transit Advisory Board

CATHY McMORRIS RODGERS
5TH DISTRICT, WASHINGTON

COMMITTEE:
ENERGY AND COMMERCE

REPUBLICAN LEADER,
CONSUMER PROTECTION AND
COMMERCE

Congress of the United States House of Representatives

COUNTIES:
ASOTIN
COLUMBIA
FERRY
GARFIELD
LINCOLN
PEND OREILLE
SPOKANE
STEVENS
WALLA WALLA
WHITMAN

March 26, 2019

Sound Transit
401 S. Jackson Street
Seattle, WA 98104

Dear Sound Transit Board Members,

I am writing to submit comments as the Board continues its consideration of options to complete the Ballard Link Extension crossing the Lake Washington Ship Canal in Seattle, Washington.

I encourage the Board to give full and fair consideration to eliminate from further consideration the option for a "High-Level Bridge," which would significantly disrupt critical maritime and cargo-handling operations. This option would permanently disrupt the ability for Coastal Transportation, the only remaining carrier operating under the federally-approved *Alutian Trade Act of 1990*, to operate from its facility in the Ship Canal. This trade agreement is an important multi-decade pact which ensures good transported between Alaska and the United States are handled safely and efficiently.

Additionally, disruption of these maritime operations in the Ship Canal would endanger the ability of my constituents in Eastern Washington, as well as throughout the country, to consume the more than 70,000 metric tons of cargo imported each year via this operation. It is a valuable link between Alaska and the continental United States, particularly Washington.

As an alternative, I encourage the Board to give full and fair consideration to proceed with the option to construct a tunnel passage beneath the Ship Canal to complete the Ballard Link Extension. This plan would achieve the public's goals for additional light rail service from the extension without disrupting the critical economic activity currently taking place via maritime operations and cargo handling in the Ship Canal.

Thank you for your consideration.

Sincerely,



Cathy McMorris Rodgers

1035 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-2006
FAX: (202) 225-3392

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SPOKANE, WA 99201
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WALLA WALLA, WA 99362
(509) 529-9358

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Congress of the United States
House of Representatives
Washington, D.C. 20515

March 14, 2019

Dear Sound Transit Board Members,

I write to you in regards to the ongoing consideration of options for completing the Ballard Link Extension crossing the Ship Canal in Seattle, Washington.

It is my understanding that the Board has recently completed the third and final scoping session soliciting public comments on paths forward for the project. It is also my understanding that one of the options under consideration is a "High-Level Bridge" alignment option that would extend across the Lake Washington Ship Canal at 14th Avenue West and disrupt critical maritime and cargo handling operations for the maritime shipping company Coastal Transportation.

The disruption of these operations would be hugely detrimental for my constituents on the Alaska Peninsula, the Aleutian Chain, and the Pribilof Islands who rely on Coastal Transportation for their year-round service to and from ports in the region. I must request that this option be eliminated from consideration due to the associated cost this would have for my constituents and Alaska.

Moreover, I also understand another option under consideration is a tunnel that would pass beneath the Ship Canal and pose minimal impacts for maritime activities. I support this option as it would provide light rail service to Ballard without disrupting critical shipping operations on the canal.

I appreciate your consideration for this request and urge that you move forward with the path of least disruption and construct a tunnel to provide light rail service to Ballard while maintaining important maritime operations.

Sincerely,


DON YOUNG
Congressman for All Alaska



SEATTLE CITY COUNCIL | DISTRICT 1

COUNCILMEMBER LISA HERBOLD

April 2, 2019

sent by electronic mail

Lauren Swift, Sound Transit
401 South Jackson Street
Seattle, WA 98104

Dear Ms. Swift,

I am submitting these comments as District 1 Seattle City Councilmember, representing West Seattle and South Park. I am writing to:

1. Let Sound Transit know what I've been hearing from constituents in West Seattle about the ST3 proposal
2. Help inform the Sound Transit Board's identification of a Preferred Alternative and other alternatives to study in the Environmental Impact Statement (EIS)
3. Reiterate my concern expressed in the March 29 Elected Leadership Group meeting that the schedule for publishing scoping comments does not allow members of the Elected Leadership Group (ELG), nor the Stakeholder Advisory Group (SAG), adequate time for review before making recommendations.

There is strong support for bringing light rail to West Seattle, but there is also significant concern about impacts

- Locating light rail stations and alignment will be a 100-year decision, with permanent, long-term impacts on the West Seattle community
- An elevated alignment through the heart of the West Seattle Junction Urban Village, and through a built neighborhood in the Youngstown area of North Delridge, would be unique to this line and unprecedented for light rail in Seattle
- Concerns are focused on displacement from residents and businesses in the Alaska Junction, especially regarding the elevated option; from residents around 35th and Avalon; in North Delridge; and Pigeon Point
- Concerns about construction impacts are also worthy of consideration, in particular reduced access to the peninsula, which has a small number of access points

I support consideration of the following additional options or design alternatives:

- In Delridge, please consider alternatives that reduce the impact on the neighborhood:
 - The Pigeon Ridge (purple) option, specifically those features such as: i. a station location that minimizes impacts on residents in the Youngstown area of North Delridge, ii. a station location further south than other alternatives, and iii. the best transfer environment for riders from communities to the south
 - The Yancy Street option considered in Level 1, or a similar design alternative

- Additionally, alternatives that reduce the visual and emergency access impact of the guideway height, especially along Genesee
- Given the developed nature of the West Seattle Junction and Youngstown neighborhoods, and the potential impact of an elevated alignment, consideration of additional option(s)/design alternatives in the EIS
 - One option would be to carry additional option(s)/design alternatives through the Draft Environmental Impact Statement, scheduled for 2020, and then have the Board consider which options to carry into the Final EIS. This could be done with an understanding that work will be done on funding
- Encouragement for mixing and matching options

I support identifying potential cost savings to fund tunnel(s)

- Consider potential station consolidation, if this assists in making tunnels more affordable in West Seattle and Ballard; in West Seattle community members have suggested, for example, elimination of the Avalon station (two stations are proposed in the West Seattle Junction Urban Village); two Level One options proposed by Sound Transit in West Seattle consolidated stations
- I encourage Sound Transit to explore opportunities for savings in the portions of the alignment planned for a tunnel; for example, in South Lake Union

Project purpose and need, and 2030-2035 service

- The line as planned would require West Seattle riders travelling north to transfer at the SODO station from 2030-2035. During peak commute times, for example the morning rush hour, trains arriving at the SODO station are likely to be full heading into Downtown, making for a poor transfer environment, and resulting in longer commutes for West Seattle riders. This runs contrary to the Purpose and Need statement for ST3, to *“Provide high-quality rapid, reliable and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the ST3 Plan”*.
 - As a practical matter, bus service would likely be needed during peak commute times at current levels, limiting the effectiveness of the overall transportation system
 - This must be addressed either in, or alongside the EIS.

In closing, I request more time for review after the publishing of the Scoping Summary before either the SAG meeting or the next ELG is scheduled. In the March ELG meeting I asked whether the scoping comments are considered to be instructive to Level 3 review advisory decisions of the SAG and the ELG. My question was answered in the affirmative. For this reason I respectfully request a week's time between the publishing of the Scoping Comments Summary and scheduling the SAG and ELG meetings.

Sincerely,



Seattle City Councilmember
District 1, West Seattle and South Park



APPENDIX E

Business and Business Organization Comments



Charles P. Costanzo
Vice President - Pacific Region

5315 22nd Avenue NW
Seattle, WA 98107

ccostanzo@americanwaterways.com
206.257.4723

April 2, 2019

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

Re: West Seattle and Ballard Link
Extensions Project Scoping

Dear Lauren Swift:

On behalf of the American Waterways Operators, the national trade association for the U.S. tugboat, towboat and barge industry, thank you for the opportunity to provide scoping comments on the proposed projects to extend Sound Transit's light-rail service to West Seattle and Ballard. The U.S. tugboat, towboat and barge industry is a vital segment of America's transportation system. The industry safely and efficiently moves over 760 million tons of cargo each year, including more than 60 percent of U.S. export grain, energy sources, and other bulk commodities that are the building blocks of the U.S. economy. The fleet consists of nearly 5,500 tugboats and towboats, and over 31,000 barges. These vessels transit 25,000 miles of inland and intracoastal waterways, the Great Lakes, and the Atlantic, Pacific and Gulf coasts. Tugboats also provide essential services including ship docking, tanker escort, marine construction, and bunkering in ports and harbors around the country.

In 2017, the combined economic impact of Washington's maritime industry was nearly \$38 billion, with a direct revenue of over \$17 billion. The state's maritime industry drives job creation and enhances job preservation throughout the region. Over 70,000 Washingtonians are directly employed in the expanding maritime sector with an average salary at \$65,150. The maritime industry supports an additional 190,000 jobs throughout Washington.

Sixteen AWO member companies are headquartered in Washington, and over a dozen others operate tugboats and barges on Washington waters. AWO members operate tugboats and barges that regularly transit the Lake Washington Ship Canal (LWSC) and the Duwamish Waterway, in some cases with barges in tow. Additionally, AWO members operate shipyards and terminals along the LWSC and the Duwamish Waterway and rely on other Seattle shipyards and marine industrial service providers for vessel construction and maintenance.

These towing vessels serve the entire region by transporting commodities, supporting construction projects, and assisting ships. For instance, AWO member vessels regularly transit the Lake Washington Ship Canal and the Lower Duwamish waterways to perform freight barge

service for the Alaska and Hawaii markets, and AWO member vessels regularly transit the east and west waterways around Harbor Island and the Lower Duwamish to perform ship assist work in the Port of Seattle.

Sound Transit's proposals for the West Seattle and Ballard link extensions have the potential to significantly affect the daily business operations of Washington's maritime businesses. Throughout Sound Transit's review of the environmental, construction, and operational impacts of the proposed link extensions, AWO requests careful consideration of the concerns and recommendations below to minimize the projects' harmful effects on the economy and mitigate those that cannot be avoided.

West Seattle Link Extension

The Ports of Seattle and Tacoma jointly represent the nation's fourth largest gateway for international trade and are jointly operated by the Northwest Seaport Alliance. Vessels, trucks and trains need regular and efficient access to these port facilities and the West Seattle Link Extension must account for potential issues of disruption, congestion, and freight mobility in and around the port. The preservation of truck and marine access to and from the public and private marine terminals, especially Terminals 5 and 18, is critical to the economic vitality of Seattle's maritime sector, including tugboat and barge operations in Seattle.

AWO is concerned that the proposed rail extension link over the Duwamish Waterway would significantly affect tugboat and barge operations by impeding either rail or truck access to and from Terminals 5 and 18 and other private sector facilities. Conservatively, 390 fuel trucks transit to and from Harbor Island private fuel terminals every day. Each truck transports an average of 9,000 gallons of fuel for a daily amount of 3,510,000 gallons. This product is transported throughout Washington State and a disruption in service could negatively impact regional fuel prices. Therefore, AWO recommends that the Environmental Impact Statement (EIS) review the proposed Spokane Street Corridor alignments, especially those north of West Seattle Bridge, and ensure maritime facilities remain fully operational throughout construction and after completion of the project. Sound Transit should evaluate how the project will ensure access to truck and rail assets serving those facilities, navigable waters, and shore operations from the federal channel (related to pier placement) both during construction and project operations.

To prepare for larger container vessels and to drive growth in international marine cargo, the Port of Seattle has secured permits to perform more than \$300 million in infrastructure improvements to Terminal 5 by 2025 as a part of the T-5 Wharf Rehabilitation, Berth Deepening, and Improvements Project. Terminal 5's timely improvements are critical for Washington state exports to Asian markets, in addition to growing cargo volumes and maritime jobs in the Puget Sound region. Additionally, the City of Seattle has recently completed the Lander Street Bridge, a \$123 million project to create an efficient freight corridor by providing a direct connection to Port of Seattle facilities and freight operational support centers. AWO recommends that the proposed West Seattle link extension does not adversely affect these critical infrastructure investments, which represent opportunities to strengthen Seattle's maritime economy, and requests full evaluation of these concerns in the EIS.

To minimize negative effects on maritime operations, AWO recommends aligning the proposed Duwamish crossing for Link light rail farther south. AWO strongly recommends that Sound Transit evaluate the previously discarded Purple Line route, which is less disruptive compared to the Blue Line route. The Blue Line Route proposes a crossing point over the Duwamish Waterway directly above critical maritime operations areas, which would be catastrophic for maritime businesses operating below the construction footprint of the Blue Line's proposed Duwamish crossing point. Additionally, AWO recommends that the air draft for the bridge over the commercial waterway be at least as high as the West Seattle Bridge, and that column spacing within the waterway be at least 200 feet apart and in alignment with the existing navigation channel.

Ballard Link Extension

AWO recommends that any proposal for a Ballard link extension meet the needs of existing and future navigation on the Lake Washington Ship Canal. The Lake Washington Ship Canal is a vital waterway for regional maritime interests from the beginning of the channel at the Ballard Locks to the interior waters of Lake Union, Lake Washington, and a large network of interconnected waterways. AWO members are involved daily in towing operations on the Ship canal and rely on the opening of the Ballard bridge for tows of barges up to 300 feet long. As the keystone of Washington's maritime system, the Ballard Locks are the busiest in the nation, with over 40,000 commercial and recreational vessels passing through the locks each year.

Together, the canal and lock system supports a vibrant maritime economic cluster that was highlighted in a 2017 study by the McDowell Group, reflecting:

- At least \$90 - \$120 billion over the next 75-100 years (\$1.2 billion annually) in maritime activity, including commercial fishing companies, shipyards, vessel sales, freight and shipping services, and marinas;
- \$9 - \$12 billion in payroll over the next 75-100 years (\$120 million annually);
- 3,000 full-time equivalent jobs; and,
- \$1.1 - \$1.5 billion over the next 75-100 years in federal tax revenues (\$15 million annually).

AWO recommends Sound Transit acknowledge this substantial regional economic impact and avoid negative impacts to this important industrial cluster. Aerial alignments across Lake Washington Ship Canal could significantly affect both the safety and efficiency of AWO member operations by impeding and obstructing vessel navigation. Navigation obstructions along Lake Washington Ship Canal such as a fixed-height bridge or bridge abutments could force large vessels and barge tows into increasingly narrow canal space, presenting significant safety risks.

A moveable bridge across the Ship Canal and its abutments would pose challenges for safe vessel navigation. The increased bridge opening requirements of a vessel to transit 2 bridges while depending on bridge operations to reliably open upon their approach create significant safety concerns for AWO members. In addition, vessel delays due to congestion represent increased costs for customers throughout the Pacific Northwest and communities in Alaska that

Ms. Swift
April 2, 2019
Page 4

rely heavily on the commercial navigability of Lake Washington Ship Canal for essential commodities.

Therefore, AWO supports the elimination of aerial alignments across Lake Washington Ship Canal and recommends a tunnel route as an alternative to limit negative effects on the flow of maritime commerce during and after project construction.

Shoreline Management Act

Washington's Shoreline Management Act (SMA) was enacted in 1971 to manage and protect the shorelines of the state by regulating development around Washington's coastal, tidal, and shoreside lands. A major goal of the Act is "to prevent the inherent harm in an uncoordinated and piecemeal development of the state's shorelines." The SMA accomplishes this major goal in part by allowing preference to shoreline uses that inherently depend on proximity to the shoreline.

Many of Seattle's maritime businesses, including AWO members' shoreside operations, inherently depend on access to both water and land. For many of these operations, relocation is impossible. To align with the intent of the SMA, AWO recommends that Sound Transit allow preference to these shoreline uses should the proposed link extensions demonstrate potential to displace or significantly disrupt the operation of these water-dependent facilities.

AWO appreciates the opportunity to provide comments regarding Sound Transit's proposed West Seattle and Ballard light rail link extensions. Please do not hesitate to contact me with any questions.

Sincerely,



Charles P. Costanzo
Vice President – Pacific Region

Anderson & Associates



7420 SE 24th Street Ste 4
Mercer Island, WA 98040
(206) 397-3579
(206) 402-4325

Sent via email on March 12, 2019

Date: March 11, 2019

To: West Seattle and Ballard Link Extensions
c/o Lauren Swift
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

From: M. Bruce Anderson
MBA Ballard Properties LLC
7420 SE 24th Street, suite 4
Mercer Island, WA 98040

RE: Proposed Train Station at 14th Ave. NW and NW Market St.

We object to the proposed train station at 14th Ave. NW and NW Market St. as designed. We are in the midst of planning a mixed use commercial/apartment project at the site Sound Transit proposes as a train depot for passengers. It appears from the preliminary drawings of the elevated station that the ingress and egress platform will extend onto our property at the NE corner of NW Market St. and 14th Ave. NW. If the platform structure is not built in the public right of way, Sound Transit will have to condemn our property.

We have been waiting for the "upzone" of the neighborhood to occur. Based on the rezone we have designed a large mixed-use commercial/residential project for the site. The project will have a first level of commercial space, four additional levels of apartments and two levels of underground parking. The commercial space is slated to be absorbed by two national credit tenants. We have spent a great deal of time in preparation for redeveloping the site. Both existing leases will expire in the near term and one of the commercial tenants will move back into new retail space upon completion of the project.

If Sound Transit makes the decision to build an elevated train line on 14th Ave. NW we see no reason why the access point to the station platform could not be moved south 100 to 150 feet to allow passengers to access the platform from a structure built over an existing vacant parking lot just south and across NW 54th St. from MacDonald's. A platform built over the

Anderson & Associates



7420 SE 24th Street Ste 4
Mercer Island, WA 98040
(206) 397-3579
(206) 402-4325

vacant parking lot would not impact existing tenants, structures nor impede our new development. The parking lot access point would certainly be less disruptive and less costly for Sound Transit to acquire.

If the 14th Ave NW corridor becomes the chosen route for the train, the platform for the NW Market St. and 14th Ave NW crossover should be designed to allow ingress and egress from the parking lot at the SE corner of NW 54th St. and 14th Ave. NW. Again, it will be less disruptive and expensive for Sound Transit to pursue.

We look forward to the committee's concurrence.

Thank you,

M. Bruce Anderson

Owner

MBA Ballard Properties LLC



March 31, 2019

Ballard Link Extension
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA. 98104

Email: wsbscopingcomments@soundtransit.org//

Attn: Stakeholder Advisory Group, Elected Leadership Group, and Sound Transit Board Members:

As management of a maritime company and property that will be significantly impacted by the routing of ST3 Ballard Link, we would like to express a strong preference for a tunnel as the best route for crossing the Lake Washington ship canal.

Every property adjacent to the ship canal is vital to maintaining a vibrant working waterfront that supports the diversity of maritime related businesses necessary to continue successfully servicing the Gulf of Alaska, Bering Sea, Puget Sound, Southeast Alaska, and Coastal WA & OR commercial fishing fleets; the recreational boating and fishing fleets of Puget Sound & Lake Washington; and all the other maritime commerce that either emanates from this waterway or visits for repairs, refueling and outfitting.

Seattle currently enjoys the envious position of being the first choice as a port of call for services for commercial vessels of any kind that operate in Alaska. Any route other than a tunnel will threaten the businesses that provide well-paying maritime related jobs and the associated tax base.

The bridge option west of 15th Ave. NW. would have a devastating impact on the south side to the continued viability of Fishing Vessel Owners shipyard and marine railway (currently celebrating its 100th anniversary), and would also take out a portion of Western Pioneer property on the north side. Relocation is not a practical option for Fishing Vessel Owners so that would bring their demise.

Similarly, the bridge option on 14 Ave. NW. would cause harm to the operations of Coastal Transportation whose ships are a vital link to the ports of Alaska, transporting food and supplies north and bringing frozen fish south to market. In addition to the impacts on their property, columns in the water out in front of their docks would severely impact their ability to maneuver their ships. The north side of this route would adversely impact the 14th Ave. NW public boat launch and the massive pile caps and support columns would negatively impact our property and our neighbor Northern Lights (manufacturers of ship's generators), reducing property value, ease of access, freight ingress/egress, traffic flow, sight lines, access to light and increasing noise. This in addition to the burden already placed on our property by the Burke Gilman Trail/Missing Link which transits along the north side of our property on NW 45th St.



Like any industrial center, the commercial success of the BINMIC area is completely dependent on a functioning transportation system that provides the freight mobility necessary to support the commerce. As everyone knows, our transportation system is pretty well maxed out every day. An alignment west of 15th Ave. NW that includes a tunnel to cross the ship canal would cause the least disruption both during construction and after completion.

We understand that the additional costs a tunnel would require are not included in the representative alignments, but an explanation is needed why the tunnel was not included. A Ballard tunnel was considered as late as August 2015, why was it eliminated from the draft plan? We believe it was irresponsible to exclude this option when the representative alignment was placed on the ballot initiative.

We also think that if all the costs associated with building an elevated crossing were taken into account, the difference in cost with a tunnel might be negligible if any. The costs of property purchases and property harm mitigation would be reduced. The west of 15th route has severe negative impacts on the future repair/replacement of the Ballard Bridge. Building that route simply pushes those increased costs onto the public at a later date. Both the 14th or 15th elevated routes will have large costs associated with salmon mitigation during construction. Has that been thoroughly researched and are realistic costs for that in the current estimates? Another requirement is that the canal must be kept open to ship traffic at all times – it is a federal commercial waterway connected to the busiest locks in the US. Has a realistic assessment of what it would take to accomplish that at all times during construction been calculated into the construction costs? Has ST discussed with the Coast Guard what it will take to stay in compliance with their rules during construction? Are those costs in the current estimates?

Thank you for your consideration of our comments. A project of this magnitude needs to get it right the first time as the impacts will last indefinitely and change the neighborhoods and impacted businesses forever. For all the reasons stated above and many more you will likely receive in other submissions, we implore you to select a tunnel to cross under the Lake Washington Ship Canal/Salmon Bay.

Sincerely,

A handwritten signature in blue ink, appearing to read 'W. Scott Yale II'.

W. Scott Yale II
Vice President

A handwritten signature in black ink, appearing to read 'David C. Bowman'.

David C. Bowman
President

Member: North Seattle Industrial Association

CC: (via email) Councilmember Mike O'Brien
Mayor Jenny A. Durkan
Councilmember Teresa Mosqueda
Councilmember Lorena Gonzales
NSIA President Eugene Wasserman

March 27, 2019

Submitted via email: wsbscopingcomments@soundtransit.org

WSBLE Project (c/o Lauren Swift)
Sound Transit, 401 S. Jackson Street,
Seattle, WA 98104-2826

**Re: West Seattle and Ballard Link Extension
EIS Scoping Comments**

Dear Ms. Swift:

We represent CenterPoint Properties Trust, CenterPoint 3546 Marginal Way LLC and CenterPoint Marginal LLC (collectively “CenterPoint”) owners of property located 3480 West Marginal Way SW, 3546 West Marginal Way SW and 3518 West Marginal Way SW respectively (collectively “CenterPoint Properties”). A map of the CenterPoint Properties is enclosed with this comment letter. On behalf of CenterPoint please accept these comments on the scope of the Environmental Impact Statement (“EIS”) for Sound Transit’s West Seattle and Ballard Link Extension (“WSBLE”).

Description of Property

The CenterPoint Properties are located adjacent to Terminal 5 and abut the West Waterway. The CenterPoint Properties provide moorage for business requiring access to water for loading and unloading of barges and are presently leased by business requiring industrial access to water and the Port of Seattle’s Terminals.

The area in and around the CenterPoint Properties is used heavily and there is little to no surface area that is not essential to industrial operations and freight mobility into and out of the CenterPoint Properties and Terminal 5. The CenterPoint Properties are bounded by the Port of Seattle’s Terminal 5 to the north and the West Waterway to the east. Immediately west is a dual track rail corridor and west of that is West Marginal Way. High voltage, above ground power lines occupy the limited space in between the CenterPoint Properties and the lower Spokane Street Bridge to the south.

Presently, the CenterPoint Properties are accessed via at-grade rail crossings along West Marginal Way SW and the north leg of the intersection SW Spokane Street/West Marginal Way SW/Chelan Avenue SW; however, these points of access will be effectively blocked by the Port as part of the Terminal 5 Improvements. As a result, access to the CenterPoint Properties will be dependent on being able to fully utilize all available surface space east of the existing railway for ingress and egress into and out of the CenterPoint Properties to the existing road network. A north crossing over the Lower Duwamish creates a risk the support columns will be placed in this area which may effectively deprive CenterPoint of access to the CenterPoint Properties, effectuate

a take of the CenterPoint Properties, force the relocation of the businesses utilizing the CenterPoint Properties, and further compromise freight mobility in this highly constrained and congested area.

The Preferred Alternative for the West Seattle Extension Must Cross the Duwamish Waterway South of the West Seattle Bridge

Of the proposed alignments going to West Seattle, CenterPoint requests that Sound Transit select an alternative that includes a high-level crossing of the Lower Duwamish Waterway south of the West Seattle Bridge as its preferred alternative. A south crossing will have the least amount of impact on industrial lands, businesses and their employees in the vicinity of Harbor Island and Terminal 5 including the CenterPoint Properties. It avoids the highly congested area between the West Seattle Bridge and Terminal 5 that is festooned with critical transportation and utility infrastructure servicing West Seattle and the Port of Seattle's Terminal 5. And, a south crossing will also avoid unnecessary construction of overpasses over the West Seattle Bridge, lower Spokane Street Bridge, and Terminal 5 access bridge. An overpass over the West Seattle Bridge will create visual distractions to drivers on the West Seattle Bridge and may also complicate emergency access to and from Terminal 5 and West Seattle in the event of a natural disaster.

Alternatives for the Duwamish Crossing Should Be Assessed Independently

The WSBLE is a massive project that consists of two independent and distinct segments: (1) extension of light rail from downtown to West Seattle ("WS Extension"); and (2) extension of light from downtown to Ballard ("Ballard Extension"). Alternatives for the WS Extension follow the same general alignment except where the extension crosses the Duwamish where the alignment diverges between a crossing south of the West Seattle Bridge and north of the West Seattle Bridge. This segment of West Seattle Extension should be assessed independently of their pre-selected counterparts beyond the proposed Delridge Station in the EIS.

The importance of properly defining alternatives is essential to SEPA's purpose:

It is difficult to overstate the importance of reasonable alternatives to achieving SEPA's underlying policy goals, which seek to balance the needs of the environment with the inevitability of development. By explaining how the action agency can achieve its project objectives at a lower environmental cost, the discussion of reasonable alternatives in the EIS carries out SEPA's core policy in the form of practical advice.

Columbia Riverkeeper v. Port of Vancouver, 188 Wn.2d 80 (2017) (dissent J. Stephens) (citations omitted). Here, Sound Transit has two main alternatives to cross the Duwamish Waterway. Yet Sound Transit conflates these alternatives into pre-ordained route selections for the entire length of the WS Extension. This has the effect of limiting design flexibility and diluting the discussion

and assessment of the alternatives for crossing the Duwamish Waterway to the detriment of SEPA's primary purpose: to provide decision-makers with a fully-informed assessment of the environmental impacts of a proposed action.

For example, a tunnel option north of the proposed Delridge Station may be the best alternative for that segment of the WS Extension even though a south crossing of the Lower Duwamish Waterway would have fewer impacts than a north crossing. But because the tunnel option is tied to a north crossing the relative benefits of a south crossing may be overshadowed by the benefits of a tunnel. Evaluating these component parts independently will allow for an unfiltered assessment of their benefits and impacts which will allow for selection of an alignment that best meets the purpose and need for light rail with the least amount of adverse environmental impacts.

Unavoidable Adverse Impacts

The WSBLE will have numerous significant unavoidable impacts both during construction and post construction. CenterPoint Properties requests the following general issues be assessed in the EIS:

Acquisitions, Displacements and Relocations: The EIS should evaluate the cumulative effect of the loss and fragmentation of large industrial-zoned parcels like the CenterPoint Properties. It should also assess the availability, or lack thereof, of large industrial parcels for relocation of businesses reliant on these types of properties.

As noted above, the CenterPoint Properties are leased by businesses the rely on industrial access to water and the Port Terminals. The EIS should assess the impacts of displacing these businesses to other locations further away from Port infrastructure including, but not limited to, longer truck trips and increase emissions.

Additionally, the EIS should assess the displacement of existing utility infrastructure associated with a north crossing. High voltage, above-ground power lines parallel the West Seattle Bridge and lower Spokane Street Bridge. A north crossing may require relocation of these power lines which may lead to service interruptions. Relocating these utility lines may also require greater business displacements and property acquisitions than a south crossing.

Economy: We have significant concerns about economic impact resulting from unmitigated impacts to industrial businesses. The EIS should analyze the potential for impacts on industrial lands and businesses from acquisitions, displacements, and relocations on interdependent businesses and land. As noted above, alignments that result in even a minimal loss of industrial land or that interfere minimally with freight mobility will have significant impacts on the industrial economy in the area.

Land Use: We are concerned that extension of light rail and the placement of stations will increase pressure to convert industrial lands to non-industrial uses. The EIS should assess the potential that each alternative will increase pressure for high-density, non-industrial development, especially along the shoreline.

The alternatives should also be analyzed against local planning policies. For example, the City's Comprehensive Plan includes a host of policies aimed at preserving and expanding industrial business in the Greater Duwamish Manufacturing Industrial Center ("GDMIC") some of which we provide here:

- GD-G7 The City and other government bodies recognize the limited industrial land resource and the high demand for that resource by private industrial businesses within the Duwamish Manufacturing/Industrial Center when considering the siting of public uses there.
- GD-P8 Strive to protect the limited and nonrenewable regional resource of industrial, particularly waterfront industrial, land from encroachment by nonindustrial uses.
- GD-G9 A high level of general mobility and access is attained within the Duwamish Manufacturing/Industrial Center.
- GD-P26 Recognize and strive to address the cumulative traffic effects that transportation and development projects in and near the Duwamish Manufacturing/Industrial Center can have on freight mobility.
- GD-P34 Recognize the importance of intermodal connections for the movement of freight between the state highway system, rail yards, barge terminals, Port terminals, airports, and warehouse/distribution centers.
- GD-P35 Strive to minimize disruptions to freight mobility caused by construction (including construction of transportation facilities) in the Duwamish Manufacturing/Industrial Center.

Analysis of the alternatives against these policies is of paramount importance because all the alternative route selections proposed by Sound Transit will cross through the GDMIC. All alternatives should be evaluated to determine which alternatives best achieve these land use policies aimed at preserving and enhancing the industrial uses in the GDMIC.

Social Justice: All alternatives for the Ballard Extension tunnel through the downtown commercial core thereby saving the property owners, businesses and their employees in those commercial areas from suffering the impacts associated with construction and operation of the WSBLE. None of the West Seattle Extension alternatives include a tunnel through the industrial area on either side of the Lower Duwamish Waterway. The EIS should address the social justice issues associated with route selection and design and its disparate impact on "blue-collar"

businesses and employees as compared to “white-collar” business and employees in commercial areas north of downtown.

Traffic: The EIS should assess impacts to traffic. The north crossing requires an elevated structure above the West Seattle Bridge as the extension curves south towards Delridge. The EIS should assess the visual distraction an elevated structure above the West Seattle Bridge will create for drivers.

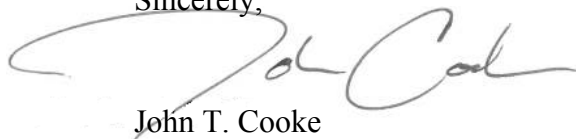
Additionally, the EIS should assess the cumulative traffic impacts from the Port of Seattle’s Terminal 5 Improvement Project on local surface traffic below the West Seattle Bridge. There is very little unused surface space in the area between the West Seattle Bridge, Terminal 5 and the CenterPoint Properties. Surface space that is not occupied by buildings in this area is used for transportation and is essential to freight mobility to and through the area. Locating columns to support an upper level crossing in any of these areas will have a disastrous impact on mobility through this highly congested area.

Disaster Planning: The EIS should assess disaster planning either as a subset of the topics already proposed for study or as a new independent area of study. The Seattle area is seismically active. The West Seattle Fault runs through north West Seattle and Harbor Island north of the West Seattle Bridge. Analysis of alternatives must consider the possible impacts construction of the WSBLE will have in the event of a natural disaster like an earthquake.

The West Seattle Bridge and lower Spokane Street Bridge are the primary means of vehicular access to and from West Seattle. The Terminal 5 access bridge will be the only point of access to Terminal 5 when the Port completes its proposed improvement to Terminal 5. A north crossing would require an overpass over the West Seattle Bridge. and the West Seattle Bridge and the Terminal 5 access bridge. Constructing light rail overpasses over these critical pieces of infrastructure creates a significant risk that they may be blocked in the event of a natural disaster and prevent emergency services like City of Seattle Fire Station 36, which is located just beneath the West Seattle Bridge, from reaching areas in need. The proposed southern crossing avoids these impacts because they do not require overpasses over these essential access routes.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Cooke", is written over a horizontal line.

John T. Cooke

Encl.

Cc: Client

CENTERPOINT PROPERTIES TRUST'S MARGINAL WAY SW PROPERTIES

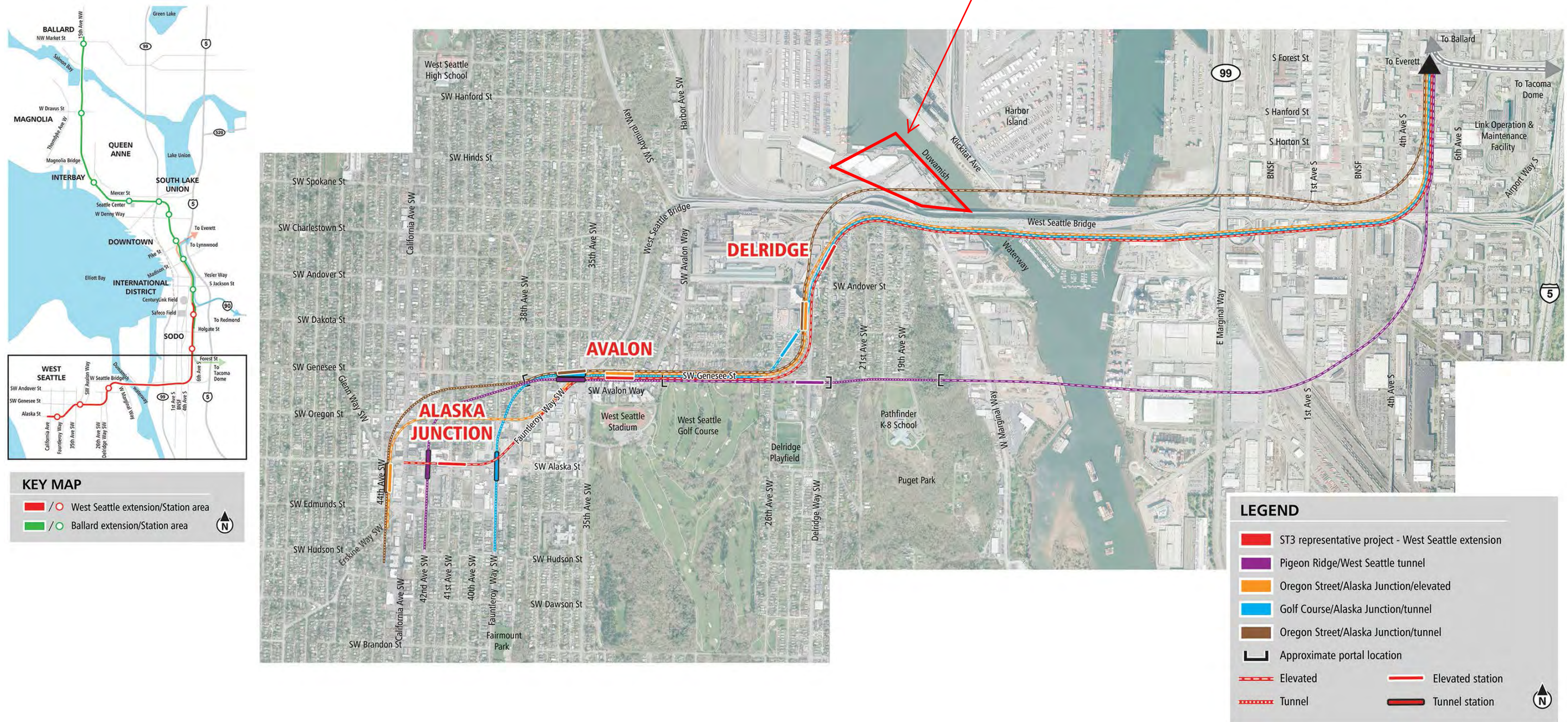


Figure B-1 West Seattle/Duwamish Segment—Level 2 Alternatives



March 29, 2019

Sound Transit

401 S. Jackson St.
Seattle, WA 98104

Via Email: WSBLink@SoundTransit.org & Sound Transit Board Members & Working Committee Members

Attn.: Sound Transit Board of Directors
Elected Leadership Group, WSBL
Stakeholder Advisory Group, WSBL
WSBL Stakeholders

Re: Sound Transit West Seattle Ballard Link Extension ("WSBL") Alignment Alternatives

Dear Sound Transit Board Members, Elected Leadership Group, Stakeholder Advisory Group, and other WSBL stakeholders;

CenterPoint Properties Trust, CenterPoint 3546 Marginal Way LLC and CenterPoint Marginal LLC (collectively "CenterPoint") are owners of property located 3480 West Marginal Way SW, 3546 West Marginal Way SW and 3518 West Marginal Way SW respectively (collectively "CenterPoint Properties"). We are asking you to eliminate the crossing of the Lower Duwamish Waterway north of the West Seattle Bridge ("North Crossing") from the alignment options carried forward into the EIS process.

As you know, Sound Transit is currently considering three options for the West Seattle Extension crossing of the Lower Duwamish Waterway. The North Crossing alignment will result in light rail cutting through the core of CenterPoint's property at 3518 West Marginal Way SW. (Attached at Exhibit A is a depiction of the North Crossing with the 3518 West Marginal property noted in red). The alignment will require construction of a massive foundation and support column on or adjacent to the 3518 property to support the span crossing the west waterway. Such construction work will undoubtedly require taking all or a substantial portion of the properties.

Industrial land abutting navigable waterways is unique and irreplaceable. The features and benefits of this particular property are rare and include: direct railroad and intermodal loading access from the marine terminal and deepwater moorage. Properties like these are essential to maintaining a vibrant and diversified maritime industrial economy. They should be preserved.

Similarly, a north crossing would have significant impacts on freight mobility in the area. The north crossing alignment crosses the Terminal 5 Access Bridge, West Marginal Way SW, Chelan Avenue SW and SW Spokane Street before turning south over the West Seattle Bridge. The surface area beneath the proposed alignment is completely paved with critical road infrastructure. There is simply no room to place a support column for the elevated line north of the West Seattle Bridge without significantly impeding ingress and egress throughout the area. Placing a column in this highly congested area will have devastating impacts on ingress and egress to and from West Seattle as well as freight mobility.

In addition to the property impacts, CenterPoint's three tenants would also likely be displaced without an ability to relocate to equivalent operational properties. Island Tug and Barge, SeaPac Terminals and PacWest Terminal lease the CenterPoint Properties. All of them rely heavily on access to the waterway, moorage, railroad lines and freight access/circulation. A north alignment risks loss of these tenants and their hundreds of family wage jobs in their operations and the businesses that serve them. The south alignment would avoid these adverse impacts.

A south crossing will have the least amount of impact on industrial lands, businesses and their employees in the vicinity of Harbor Island and Terminal 5 including the CenterPoint Properties. It avoids the highly congested area between the West Seattle Bridge and Terminal 5 that is replete with critical transportation and utility infrastructure. Moreover, the south crossing is currently projected to be \$300 Million dollars less expensive than the north crossing.

CenterPoint supports an alternative alignment that would cross the Lower Duwamish Waterway south of the West Seattle Bridge. CenterPoint asks the Sound Transit Board, Elected Leadership Group and Stakeholder Group to reevaluate the proposed north crossing alignment and eliminate it from further consideration.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Bob Andrews", is positioned above the typed name.

Bob Andrews, Executive Vice-President

Cc.: Recipient list on following pages.

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West Seattle and Ballard Link Extensions

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**Sound Transit Stakeholder Advisory
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West Seattle and Ballard Link Extensions

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Force 10 Hoops/Seattle Storm

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Martin Luther King Labor Council

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American Experience

Scott Rusch
Fred Hutchinson Cancer Research Center

Steve Lewis
Alliance for People with disAbilities

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Nucor Steel
Walter.Reese@Nucor.com

Warren Aakervik
Community Representative - Freight

Willard Brown
Delridge Neighborhood Development
Association

**Cc.: Other Industrial and Maritime
Business Community Stakeholders**

Eugene Wasserman, President
North Seattle Industrial Association
Eugene@ECWAssociates.com

April 1, 2019

WSBLE Project (c/o Lauren Swift)
Sound Transit, 401 S. Jackson Street,
Seattle, WA 98104-2826

wsbscopingcomments@soundtransit.org



Dear Ms. Swift:

We are Coastal Transportation (Coastal) and Salmon Bay Terminals (SBT). Please accept these comments on the scope of the Environmental Impact Statement (EIS) for Sound Transit's West Seattle and Ballard Link Extension (WSBLE).

Description of Property/Business

Coastal and SBT are local, family-owned companies that operate at 4025 13th Avenue West (Coastal Property). Coastal provides marine transportation services between the terminal situated on the Coastal Property and remote Alaskan ports not serviceable by roads. SBT provides terminal and property management services at the Coastal Property. SBT and Coastal directly employ approximately 120 people. Alternative routes proposed by Sound Transit for WBSLE may result in acquisition of all or a portion of the Coastal Property which would have a devastating impact on Coastal and SBT's ability to engage in interstate commerce at the Coastal Property.

The Coastal Property is uniquely suited to Coastal's operations because of its size, zoning, shoreline location and access to rail and arterials. Coastal operates a fleet of five vessels with a gross tonnage ranging from 1,920 to 2,451 and 225 to 244 feet in length. We are the only company operating Aleutian Trade Act (ATA) self-sustaining freighters to Western Alaska. The Coastal Property provides moorage with sufficient depth to accommodate these vessels and provides access to key Alaskan shipping routes. The Coastal Property also is large enough to accommodate cargo staging, Coastal's frozen seafood handling warehouses, and an intermodal facility for freight distribution via rail and long-haul providers.

Coastal is not aware of any other similar-situated property in the Seattle area that meets its operational needs. Loss or fragmentation of the Coastal Property would significantly impact Coastal's operations and at best force it to leave the Seattle area. Furthermore, any disruption in servicing remote Alaskan ports would be unacceptable to those communities and a violation of Federal protections of interstate commerce.

The Preferred Alternative for the Ballard Extension Must Include a Tunnel at the Salmon Bay Crossing

Of the proposed alignments going north, Coastal urges Sound Transit to select an alternative that includes a tunnel at the Salmon Bay Crossing as its preferred alternative. As outlined more fully below, a tunnel option will have the least amount of impact on industrial lands, businesses and their employees in the vicinity of Salmon Bay including, but not limited to, Coastal and SBT. Additionally, a tunnel option is the only option the best meets the purpose of the proposal to:

Provide high-quality rapid, reliable and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the ST3 Plan.

A movable bridge at the Salmon Bay crossing will subject rail schedules to the whim of vessel traffic. Since 2011, the Ballard Bridge has opened an average of 4,000 times per year.¹ That is an average of almost 11 openings per day. The majority of those openings occur between the hours of 10 am and 4 pm. Coastal vessels alone pass through the Ballard Bridge twice per week and are not subject rush-hour bridge opening restrictions because they exceed 1,000 gross tons. Long-term functionality and reliability of the Ballard Extension, especially in light of likely future extensions north from the Ballard station, demand a tunnel crossing at Salmon Bay.

Alternatives for the West Seattle Extension and Ballard Extension Should be Assessed Independently

The WBLE is a massive project that consists of two independent and distinct segments: (1) extension of light rail from downtown to West Seattle (WS Extension); and (2) extension of light rail from downtown to Ballard (Ballard Extension). Alternatives for the WS Extension should be assessed independently from the alternatives for the Ballard Extension in the EIS. Evaluating each segment independently ensures that the potential environmental costs of each segment and their alternatives are fully and specifically defined so that they may be appropriately compared and evaluated by the public and decision makers.

The importance of properly defining alternatives is essential to SEPA's purpose:

It is difficult to overstate the importance of reasonable alternatives to achieving SEPA's underlying policy goals, which seek to balance the needs of the environment with the inevitability of development. By explaining how the action agency can achieve its project objectives at a lower environmental cost, the discussion of reasonable alternatives in the EIS carries out SEPA's core policy in the form of practical advice.

Columbia Riverkeeper v. Port of Vancouver, 188 Wn.2d 80 (2017) (dissent J. Stephens) (citations omitted).

Here, Sound Transit has three alternatives for the WS Extension and three alternatives for the Ballard Extension. The alternatives result in at least nine potential alignments for the WBLE. Yet Sound Transit artificially conflates these alternatives into only three pre-ordained route selections. This has the effect of limiting design flexibility and diluting the discussion and assessment of the alternatives for each segment to the detriment of SEPA's primary purpose: to provide decision-makers with a fully-informed assessment of the environmental impacts of a proposed action.

For example, an alternative for the WS Extension may feasibly attain or approximate the proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation, than another alternative for the WS Extension. But because those impacts would be assessed in combination with pre-selected routes for the Ballard Extension the analysis of the impacts for those segments may be off-set or understated by competing impacts/benefits associated with the pre-selected alternative for the Ballard Extension.

¹ <http://www.pnw-analytics.com/bridge.html>.

Unavoidable Adverse Impacts

The WBLE will have numerous significant unavoidable impacts both during construction and post construction. Coastal and SBT provide these specific concerns for future study under each of the topics for review:

Acquisitions, Displacements and Relocations: The EIS should evaluate the cumulative effect of the loss and fragmentation of large industrial-zoned parcels like the Coastal Property. It should also assess the availability, or lack thereof, of large industrial parcels for relocation of businesses reliant on these types of properties. Some of the WBLE alternatives (most notable Alternative 2) for the Ballard Extension would fragment the 14-acre Coastal Property making Coastal's continued operation there all but impossible. There are no other similarly sized, vacant, industrially-zoned properties that about the water in the Seattle area that Coastal could relocate its operations to.

Economy: We have significant concerns about economic impact resulting from unmitigated impacts to the maritime industry in the Ballard Interbay Northend Manufacturing and Industrial Center (BINMIC) and in particular the business of Coastal and SBT. The EIS should analyze the potential for impacts on industrial lands and businesses from acquisitions, displacements, and relocations on interdependent businesses and land. As noted above, alignments that result in the loss of industrial land or interfere with maritime traffic will have significant impacts on the local and regional economy and particularly SBT and Coastal's operations.

Geology/Soils: The area around Salmon Bay is composed of fill. Detailed studies of soil conditions must be completed to ensure that adequate mitigation measures are developed to address unstable soils.

Land Use: We are concerned that extension of light rail and the placement of stations will increase pressure to convert industrial lands to non-industrial uses. Analysis should assess the potential that alternatives will increase pressure for high-density, non-industrial development, especially along the shoreline on either side of the Ballard Bridge. The alternatives should also be analyzed for consistency with local planning policies. For example, the City's Comprehensive Plan includes a host of policies aimed at preserving and expanding industrial business in the BINMIC some of which we provide here:

- Retain existing businesses within the BINMIC and promote their expansion. BI-P3.
- Support preservation of all streets within the BINMIC and arterial access routes to the BINMIC for freight mobility. To accomplish this, support preservation of turning radii, visibility and sight lines, clearance, and existing lane configurations. BI-G10; BI-P14.
- Support maintenance of and creation of pier space for larger vessels (over 60 feet) within the BINMIC to facilitate loading of cargo, provisions, and fuel and obtaining maintenance. BI-P18.
- Recognize the interdependence of maritime and fishing industries and related businesses and their special requirements for transportation, utilities, pier space, and chill facilities. Encourage retention of this cluster of businesses and facilitate attraction of related businesses. BI-P17.

Analysis of the alternatives against these policies is of paramount importance because all of the alternative route selections proposed by Sound Transit from the proposed Sound Cove station north to the proposed Ballard station are located within the BINMIC. All alternatives should be evaluated to determine which alternative best achieves these land use policies.

Social Justice: All alternatives for the Ballard Extension tunnel through the downtown commercial core thereby saving the property owners, businesses and their employees in those commercial areas from suffering the impacts associated with construction and operation of the WBLE. Only one of the three proposed alternatives for the Ballard Extension tunnel through the industrial area on either side of Salmon Bay. The EIS should assess social justice issues associated with route selection and design and its disparate impact on "blue-collar" businesses and employees especially as it pertains to the decision to place an above-ground light rail structure through the BINMIC.

Traffic: The EIS should assess impacts to traffic. We are especially concerned with impacts to freight mobility into and out of the BINMIC as well as impacts to marine traffic in and out of Salmon Bay. As noted above, the City of Seattle's Comprehensive Plan requires preservation and improvement of freight mobility into and out of the BINMIC. Presently, Coastal alone loads and unloads approximately 100 trucks per week and loads approximately 200 rail cars per year from the Coastal Property. Each railcar represents 4 trucks that would otherwise be traveling on local streets and interstates. There are no other facilities that offer this direct link between marine transportation and a rail service spur.

Visual/Aesthetics: The EIS should assess visual impacts and impacts to protected view corridors, views of the shoreline and designated scenic routes. Elevated structures across Salmon Bay will interfere and block views from the Ballard Bridge (a protected scenic route) and may also impeded views of the waterway from upland properties and pedestrian trails in the area.

Water Resources: The EIS should assess impacts to water quality, especially impacts created by overwater crossings.

Wildlife and Endangered Species: The EIS should assess impacts to wildlife in Salmon Bay. Overwater crossings will result in shading, noise and vibration that will likely have an adverse impact on fish migrating through Salmon Bay and ship canal.

Thank you for considering these comments.

Sincerely,



Elliot Strong
CEO

Communication ID: 351576

From: Elliott Way Partners LLC

Scoping Comment:

April 1, 2019

VIA: Electronic Mail

Sound Transit

1100 2nd Avenue

Seattle, WA 98101

RE: Sound Transit Ballard Link Extension – Scoping Period

Dear Sound Transit Board, Stakeholder Advisory Group, and Elected Leadership Group Members:

Elliott Way Partners, LLC (“Elliott Way”) appreciates the opportunity to provide input on development of the Ballard Link Extension (“Project”) through the scoping period. Elliott Way owns property at 1405 Elliott Avenue along the alignment. As the Interbay corridor continues to develop as an employment hub with the introduction of Expedia, Sound Transit should encourage station siting to serve major employment centers. For these reasons, Elliott Way supports the Project Alternatives One (“Representative Alignment”) and Three (“Prospect Surface Station”) because they provide opportunities to serve the redevelopment of the Elliott Avenue corridor.

The Elliott Avenue corridor is an emerging neighborhood. As companies are developing projects along this corridor – most notably Expedia, whose campus is expected to open later this year and to accommodate as many as 5,000 employees – Sound Transit should prioritize TOD station siting. All of these companies and their employees will benefit from the much-needed increase in transit accessibility, and by the vitality and reduced congestion this will bring to the surrounding area. With these benefits in mind, Elliott Way respectfully requests that the Sound Transit Board adopt either the Representative Project or Prospect Surface Station as the preferred alternative in the EIS, as either of these options would place the Smith Cove station near Prospect Street, rather than further to the north near Magnolia Bridge. Elliott Way prefers the Prospect Street location because it would directly serve more riders than the other route, in large part because of Expedia’s presence.

The Magnolia Bridge option would require Expedia’s employees to cross the railroad tracks on the roundabout, inefficient Galer Street flyover (potentially leading to bicycle-pedestrian conflicts where the flyover lets off near the Elliott Bay trail), or to walk half a mile further down busy Elliott Avenue to use the Helix Pedestrian Bridge. Either of these barriers will constitute a disincentive, meaning a lower percentage of Expedia employees will use light rail than would do so if the stop were located at Prospect Street. Because Expedia will be by far the largest employer in the immediate area, this

percentage difference will be much more significant than for any other nearby business. This means the Magnolia Bridge option would pose efficiency and accessibility challenges for a greater populace.

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These numbers also mean that Expedia employees' transportation choices will have a significant effect on nearby businesses and residential neighborhoods – much more so than the choices of any other company's workforce. If fewer Expedia employees choose transit that will have a disproportionate tendency to increase congestion and reduce parking scarcity throughout the area, including at the bottleneck formed by the outlet of the Magnolia Bridge.

Lastly, the Elliott Avenue corridor is historically known as an industrial corridor with industrial uses. One of the outcomes of this historic use is significant pollution from heavy industrial users. Sound Transit must evaluate the potential impacts that its redevelopment will have to further environmental justice and facilitate the redevelopment and abatement of toxic materials in the area. The EIS must thoroughly study the: (1) acquisition, displacement; and relocation; (2) land use; (3) economic; (4) social impacts, community facilities and neighborhoods; (5) visual and aesthetics; (6) noise and vibration; (7) geology and soils; (8) environmental justice; and (9) transportation impacts of all the Smith Cove alternatives, with special attention focused on the comparative impacts of the station location in proximity to major employment and redevelopment opportunity areas. We believe that this analysis will show that Alternatives One or Three should be the preferred route.

Again, Elliot Way appreciates the opportunity to comment and thanks the Sound Transit Board for its consideration. We will look forward to Sound Transit's thorough evaluation of EIS alternatives.

Sincerely,

Mark W. Robison, Chairman
Elliott Way Partners, LLC

Communication ID: 344231

From: Evergreen Power Systems

Scoping Comment:

Hello,

We have been following the developments of alternatives for the ST3 Sodo-West Seattle light rail extension and would like to share our input. Our business is located at 3623 E Marginal Way South (just south of the West Seattle Bridge and west of hwy 99). We are greatly concerned about potential impacts from a Duwamish waterway crossing on the south side of the West Seattle Bridge, and strongly prefer a Duwamish crossing route on the north side of the West Seattle Bridge. Our Headquarters is near/or underneath the potential pathway of a south Duwamish Crossing.

Our organization employs nearly 200 people locally, the majority of which are IBEW Union members. Our concerns fall into the following categories:

Potential Relocation of our Headquarters: Since 2007 we have made substantial investments in our building to make it suitable to our needs. A Duwamish Waterway crossing south of the West Seattle Bridge may potentially displace our property and we would be unable to find another suitable property without substantial impacts to our employees, operations, and finances. We fear potential displacement which would cause us to move out of our HUB Zone, and/or the City of Seattle.

Impacts during construction: Reduced and/or limited access to our headquarters, risks and disruptions from construction noise, pollution, damaging and/disruptive vibration during construction and potential liquefaction of soils which could damage our Lab equipment and Network Systems, Power outages and disruptions.

Impacts after construction: Potential access limitations due to new infrastructure required for a Duwamish Crossing south of the West Seattle Bridge. Potential ongoing vibration which could impact our Lab and Network Systems. Visual impacts and reduced sunlight exposure to our property. Ongoing noise impact. Reduced property value.

We strongly prefer A Duwamish Crossing on the North side of the West Seattle Bridge. A North Side routing would substantially lower the impact to our organization. Hopefully the Committees with further investigate potential mix & match variations utilizing routes crossing of the Duwamish Waterway north of the West Seattle Bridge.

Thanks,



March 18 2019

Dear Members of the Sound Transit Board,

Thank you for the opportunity to comment on the West Seattle / Ballard Link scoping process. As Expedia Group establishes our global headquarters in Seattle we are excited for the role that Sound Transit, particularly Link Light Rail service, will play in the lives of Expedia Group employees and our families across the region.

Placing the Smith Cove Station above grade at Prospect Street as shown in the Ballard Link Representative Alignment is critical to Sound Transit's mission for a variety of reasons:

Single-Occupancy Trip Reduction

Placement of the Smith Cove station will have significant impact on single-occupancy vehicle trips across the entire ST3 alignment. Expedia Group's headquarters will be a daily commute destination for thousands of employees, as are office buildings South of the Helix Bridge (e.g. the former F5 Complex). These employees will be transiting to campus from Seattle, Issaquah, Lynnwood, Tacoma, Redmond, and many other Link service areas.

Siting the Smith Cove Station at the Helix Bridge provides direct access to these existing employment centers and would maximize both the distance that riders are traveling as well as daily ridership itself—ridership that would otherwise convert to single-occupancy vehicle use.

Transit-Oriented Development and Cost

Like Expedia Group's headquarters relocation, the arrival of Link service to the Interbay corridor brings opportunity for growth and development along Elliott Avenue West. An elevated guideway in public right-of-way preserves the the opportunity for commercial and residential development, including low-income and social development like King County's planned modular homeless shelter on the Elliott's 600 block. Alternative alignments that place the Smith Cove outside of public right-of-way take away land that must be used for transit-oriented development and do so at costs of at least \$100,000,000 over the representative alignment.

Multimodal Connectivity

A Smith Cove Station at Prospect Street takes advantage of the existing above-grade pedestrian Helix Bridge which connects easily to the Centennial Park, the Waterfront, and the Elliott Bay Trail system. Not only does this provide an extensive access network to the Smith Cove Station from the West, it also connects directly to Pier 86, which is currently being examined by the Port of Seattle and the Department of Fish and Wildlife as an opportunity for public marine transit.

Like Sound Transit, Expedia Group is driven by the mission of efficiently connecting people to places, and we are grateful to provide input on the scoping process. We respectfully urge the Board to give further consideration to Ballard Link's Representative Alignment or other "mix-and-match" alternatives that maintain an above-grade station at Smith Cove at Prospect Street.

Please feel free to contact me at rilazaro@expediagroup.com or 206-660-8227 with any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dw', with a large loop at the start and a checkmark-like flourish at the end.

Richard de Sam Lazaro
Northwest Government Affairs Manager
Expedia Group

Harbor Island Machine Works, Inc.

Precision Machining / CNC Equipment



March 6, 2019

To: Sound Transit Elected Leadership Group and
Stakeholder Advisory Group

Re: Environmental Impact Statement Comments Against the North Crossing
of the Duwamish for the West Seattle and Ballard Link Extension

I wish to go on record with my comments against the current alternative of the "North Crossing" of the Duwamish waterway as part of the West Seattle and Ballard Link Extension.

- 1) The negative effects of the "North Crossing" on general commercial and private ground transportation, would be far greater than the other alternatives. The existing problems with transportation thru the proposed footprint of this alternative already have a negative effect on the local businesses and commuters, and the additional reduction in traffic corridors to access areas north of this alternative would only create even more problems. With the recent announcement of the Berth Modification Project at Terminal 5, the Port of Seattle will create even more traffic thru this corridor, and any additional restrictions on traffic flow will have an even greater economic cost. As was determined almost 40 years ago, when the High Level West Seattle Bridge was "laid" out to follow almost the same route as the "North Crossing" alternative, the option to the south was a better solution for everyone involved.
- 2) The added cost of \$300 million from what was presented to the voters, before the project even starts, should be of concern to all taxpayers effected by this project. Recent local examples of the estimated cost of government transportation projects, compared to the far greater amounts that these projects will actually end up costing the taxpayers, surround us. Starting off with adding additional costs, for an alternative that has so many additional negative economic effects in the area does not make any sense.
- 3) I also urge that the "North Crossing" alternative be removed from consideration due to the fact it's location must cross thru an ongoing EPA Superfund site, and the added costs that must be passed on to the taxpayer due to that. With the limited information I could gather from the website, and from asking your representatives, it appears the southern alternatives would bypass this superfund site.
- 4) The "North Crossing" alternative would also have a very direct negative impact on my family business, Harbor Island Machine Works, that was started in 1950. Our business is a machine shop that specializes in the machining of larger parts. We currently can perform turning operations on parts up to 20 feet in diameter, and milling operations on parts that measure up to 20 feet by 10 feet. Along with these large machines goes the lifting capacity to handle parts up to 80,000lbs at one time. As you can imagine, the machines capable of performing this work are very large, and must be attached to a foundation that keeps the entire structure of the machine in line at all times. Being

Harbor Island Machine Works, Inc.

Precision Machining / CNC Equipment



forced to relocate the business, and with it all the machines currently in place, would be an extremely costly endeavor. In addition, our current location is central to a large portion of our business; the Maritime Industry. Being located on Harbor Island, which is central to many local businesses that provide support to this industry, has benefited numerous of our customers as well the maritime industry in general. We have performed work for the largest shipyard in our area, Vigor, for many years, including machine work on the rudder for a Coast Guard Icebreaker, which weighed 75,000 lbs and large enough that transporting it further than us would have been extremely difficult. We also support, Sound Propeller, Western Towboat (Northland Services), Foss Shipyard, Duwamish Shipyard, just to name a few. While the maritime industry is a large part of our business, it is not the only industry we support. Do to our large and unique capabilities we also do work for the power generation industry, aerospace and space industry, nuclear industry, and naval construction industry, along with many other local manufacturing industries in regards to the tooling they need to manufacture their products. Customer's such as Blue Origin, SpaceX, Exotic Metals Forming, Bradken/Atlas, Hilton Valve, Electroimpact and Tadco, to name just a few that have been using our services for decades. While they may be able to find alternatives to some of the services we provide them locally, they will not be able to find alternatives for a number of the services we provide. Any disruption of our business activities for a period of time, or discontinuation for that matter, will create a hardship for many of our customers.

In summary I strongly urge you to remove the "North Crossing" from the alternatives being considered for the West Seattle and Ballard Link Extension Duwamish Crossing.

Michael T. DeFaccio, President
Harbor Island Machine Works, Inc.

Communication ID: 348495

From: Harbor Island Machine Works

Scoping Comment:

March 13, 2019

To: Sound Transit Board: wsblink@soundtransit.org

wsbscopingcomments@soundtransit.org

Wsblinkparticipate.online

The Seattle Times

RE: Light Rail Expansion

It is with considerable fatigue that I find it necessary to again be defending my Harbor Island property and the business with which I am associated from actions by government entities. Hopefully a brief history of the challenges Harbor Island Machine Works has had to overcome in order to survive during its 70 year existence will lend credence to my claim.

The saga began in the first half of the 20th century when the U.S. Navy began operations on and up-stream from Harbor Island in the Duwamish River. These activities included handling large quantities of petroleum products and repairing electrical transformers. The U.S. Navy's release of PCB's and petrochemicals caused major contamination issues on Harbor Island and in the Duwamish and Elliott Bay. This fact was either intentionally or inadvertently never made public, and over the next 4 decades, many Harbor Island properties were acquired by innocent parties who were unaware of any contamination issues.

Harbor Island Machine Works acquired its property in 1950 and grew to employ over 50 people and serviced industries employing many thousands of people. Harbor Island Machine's growth and success was the result of reinvesting profits back into the company and devoting resources to maintaining a safe, clean work environment, and to create jobs for the benefit of the local economy.

Then, in the 1970s, the Port of Seattle, in its zeal to expand, started a campaign to convince the public that the Port could provide more public benefit than could private businesses. At that time there were many large and small businesses occupying Harbor Island. The Port's claims stated in their publication entitled "Impact" are now obviously ludicrous in view of the Port's ultimate failure to replace the high paying jobs and tax revenues they displaced in their takeover of large portions of Harbor Island and nearby properties. To protect our property and business we incurred considerable expense. We had to hire attorneys and a full-time on-site manager to deal with the Port issues, and devoted significant management time and effort in order to survive as a business. Ultimately, after a lengthy and expensive battle, Harbor Island Machine Works was able to prevent the Port from

displacing it. Had the Port prevailed, the business would have been shut down due to the major, uncompensated expense associated with relocation of our very large site-specific equipment.

Much to our surprise, in 1981, we again found it necessary to defend our property and business from another costly challenge: Superfund designation of Harbor Island. Despite the fact that we did not contribute to the contamination of Harbor Island or the Duwamish waterway in any way, we were named a PRP's under CERCLA/Superfund Law because our property was surrounded by US Navy-created contamination. At the outset of the Superfund "conversation", we (naively) felt confident that because we had not contributed to the contamination on Harbor Island we would be excluded from the clean-up liability. We believed that the Federal government would acknowledge that a federal agency was responsible for a major portion of the contamination and would therefore pay for clean up along with a few other parties known to have caused the contamination. Such has not been the case, and to date our company has expended in excess of 1 million dollars to comply with EPA demands. CERCLA law applies the principle of "joint and several" liability to ALL parties within the "red line" boundaries of a Superfund -- while holding the federal government harmless.

The next episode in our saga involved the City of Seattle's effort to make much needed improvements to the Spokane Street transportation corridor. We were supporters of the city's plans for a high level crossing of the Duwamish river and willingly accepted the negative impacts the project had on our business. We felt the resulting benefits to the West Seattle community generated by the West Seattle Freeway project justified some sacrifice on our part. As it turned out, the construction process was very disruptive to our business operations and damaging to our sensitive equipment. Pile driving with high energy impact equipment damaged the foundations of our massive machines and they could not be operated as a result seismic disturbances from construction activities.

Now, in March of 2019, Sound Transit is considering acquiring some of our property for a light rail line accessing West Seattle. The project is basically a redo of the once voter-rejected light rail extension. The "new" proposal is considering a "north crossing" of the Duwamish. Selection of this route would force Harbor Island Machine Works out of business as condemnation would provide compensation only for confiscated property and would not provide compensation for the estimated \$8 million dollars it would cost to move our machines and to restore them to operational condition on a new site. We would be forced to sue to recover costs for business interruption and moving costs. Some 40 years ago when the Port of Seattle first sought to condemn our property, expert testimony revealed that the costs of moving and business interruption exceeded fair market value of the real estate by a factor of 6. Harbor Island Machine Works utilizes very large machine tools that require enormous and complex foundations and lengthy assembly procedures.

The Duwamish Crossing chart comparing the three light rail routing alternatives states that each alternative "could displace businesses that supports trade". It should be revised to state that the North Crossing alternative "eliminates businesses that support trade" due to the uncompensated costs of relocation.

Moreover, the environmental impacts of the north crossing to the Duwamish wetlands are ignored. Increased "shading" of the west and east waterways would be a direct result of the project. The North

Crossing Alternative (NCA) is in direct conflict with the State of Washington's efforts to reduce shading of near shore and waterway fish habitat. Millions of dollars have been spend by various authorities in this effort. The South Crossings have nominal shading impact because of their close proximity to existing structures.

Finally, there is NO MENTION in the North Crossing Alternative (NCA) that it entails significant dangers to human health and the environment as construction activity would occur inside the highly contaminated Superfund site. The EPA concluded that the only practical way to reduce human exposure to the surface and subsurface contaminants was to cap all of Harbor Island by paving the entire surface of the island. Disturbing that pavement cap will release highly toxic PCB's, lead, and petroleum contaminants into the environment and into the Duwamish River. Wherever construction penetrates the cap, there is risk to the environment and the public, especially to construction workers assigned to the project. Furthermore, construction inside the SF boundary will be enormously expensive relative to non-superfund site construction options.

All routing alternatives following the West Seattle Freeway corridor are inferior to a route which avoids the Harbor Island Superfund site. A crossing of the Duwamish approximately 1 mile further south would:

serve a greater population base (South Park, White Center, High Point, South Seattle Community College, Delridge and the southern portions of West Seattle),

2. be significantly less expensive to build given it would not entail as much elevated structure as the NCA and would not entail containment actions required for construction inside the Superfund zone,
3. avoid the and environmental and health hazards that would result from building inside the Superfund boundary, and
4. Use of Superfund property by any entity, public or private, would result in the RTA/County being named as PRP's and they would thus become responsible for a percentage of the long-term cleanup of Harbor Island.

For all of these reasons, the North Crossing should not be considered a viable alternative.

Having borne huge burdens for decades as a result of irresponsible and ill-conceived government actions, our business is again being forced to defend its right to exist. We are forced into a position to take legal action, work with the media, attend meetings, and do whatever else may be necessary to inform the public of the very real issues that have been overlooked in considering a North Crossing of the Duwamish. We must, at our own expense, point out to decision-makers and the public the real costs that have been neglected by the "official" RTA analyses.

Sincerely,

Lauren T DeFaccio

Sheryl J. DeFaccio

Harbor Island Machine Works, Inc.

3431 11th Ave. S.W.

Seattle, WA 98134

March 22, 2019

West Seattle and Ballard Link Extensions
(c/o Lauren Swift)
Sound Transit,
401 S. Jackson Street,
Seattle, WA 98104-2826
Sent by Email: wsbscopingcomments@soundtransit.org

Dear Lauren Swift,

The following are our remarks for the Scoping DEIS comment period for the West Seattle and Ballard Sound Transit Link Extensions.

The International Longshore and Warehouse Union Local 19 (ILWU 19) represents maritime workers who handle the loading and unloading of vessel cargo throughout the Port of Seattle. Our work on the Port terminals terminals 18, 25, 30, 46, 86, 105, and a soon to be revitalized Terminal 5 near West Seattle include: the movement, storage, and inventorying of cargo; on dock cargo rail operations; and delivering and taking cargo deliveries from over the road truck drivers (who in turn, service the rail gateways in Seattle, as well as destinations throughout the region via I-90, I-5, SR 99, SR 509, SR 599, SR 519, East Marginal Way S., West Marginal Way S., and other routes in Seattle designated by the Seattle Freight Master Plan.)

Our members are also employed to work the Port of Seattle's seasonal cruise vessels at Terminals 66, 90, and 91 (on board and dock operations). Our workforce has been dispatched to maritime work for many generations since 1934 through a full referral dispatch hall. This activity is tied strongly to the existing topography and built environment and cannot be relocated, whereas cargo itself can be easily rerouted to other port facilities, especially in Canada.

Discovering the impacts and possible disruptions by ST3 is of serious concern to us, in our efforts to preserve and enhance our members' job security as well as their contribution to the regional economy through the wealth they generate for the employers and related tax revenue. Providing reliable labor and service to the global shipping lines that call on our marine terminals, as well as the tourism and customer driven cruise lines, is a key factor in retaining this business and growing employment opportunities for our members and other workers who benefit from the economic multipliers ("induced" and "indirect" jobs)

Our members' livelihoods are dependent upon the viability of the freight supply chain within our region, the preservation of land uses and freight corridors that facilitate and support marine cargo and related manufacturing activity in Seattle, and the recognition by your agency of the crucial role of this economic activity within our \$38bn+ statewide maritime economy. As our region experiences continued growth that ST3 is designed to

accommodate, we must consider the impacts of this growth on the efficiency and viability of the local and regional cargo supply chain, including impacts from the construction, operation, and commercial real estate development patterns resulting from ST3's West Seattle and Ballard Link Extensions.

How Transit Oriented Development is designed, planned, and implemented in crucial near-Port "first-last" mile freight corridors should correspond and support (not displace) industrial land use designations and the related jobs within the Duwamish and Ballard-Interbay Manufacturing Industrial Centers (particularly in SoDo, Harbor Island, and Interbay), and play a role in the future of the viability of our Port and the livelihoods of our members and generations to come.

It has come to our attention that an additional proposed line to West Seattle from the SoDo industrial district was proposed after early scoping comments were received, and other line alternatives had been removed. One of these includes a line north of Spokane St. proposed through Terminals 18, the ingress/egress at Terminal 5 (which will be under construction shortly), and Terminal 20/25. The siting of these segments through these facilities would be catastrophic for our state's marine cargo business in the Port of Seattle and the Puget Sound Gateway, would constrain international trade throughout our state and region, and result in local living wage job loss.

We urge the removal of this option from consideration, and the reintroduction of the "Purple" line as illustrated in Phase 2 of the Stakeholder Advisory Group's discussions and documents, for the purpose of full evaluation in the DEIS.

We would like to call attention to ST's Early Scoping Information Report (February 2018), under 1.3.1 ("Purpose and Need") decision making policy criteria:

Under "Purpose":

- "Connect regional growth centers ***as described in adopted regional and local land use, transportation, and economic development plans*** and Sound Transit's Regional Transit Long-Range Plan (Sound Transit, 2014)."
- "Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development, ***station access, and modal integration in a manner that is consistent with local land use plans.***"
- "Preserve and promote a healthy environment by minimizing ***adverse impacts on the natural and built environments*** through sustainable practices."

Under "Need":

- "Increasing roadway congestion on transit routes between downtown Seattle, West Seattle, and Ballard will continue to degrade transit performance and reliability. "

- “Regional and local plans call for increased residential and employment density at and around HCT stations, and increased options for multi-modal access.”

The policy positions between Purpose and Need are contradictory, and sends a mixed message that preferred alternatives will amply consider local land use and transportation plans, and avoid adverse impacts on the built environment when these conflict with desired to leverage commercial density around transit stations located in industrial zones. We would like to see this contradiction resolved in the DEIS, which will preserve and protect the growth of maritime and industrial jobs in the MICs.

Given the above concerns, the scoping for the Sound Transit Link Extensions West Seattle and Ballard EIS should include data to account for and mitigate/eliminate all impacts:

- Policy and actual impacts of Transit Oriented Development in the existing built environment, and possible changes to the Seattle Comprehensive Plan, in relation to the Port Container Element mandated by the WA Growth Management Act;
- Policy and actual impacts of Transit Oriented Development to freight mobility, and possible changes to the City of Seattle’s Freight Master Plan;
- Policy and actual impacts of Transit Oriented Development to the conservation of urban industrial lands in Seattle to other non conforming uses, and possible impacts to the Manufacturing Industrial Center (DMIC, BIMIC) designations;
- Policy and actual impacts of Transit Oriented Development, and possible changes changes of use in the City of Seattle’s industrial zoning (IG1, IG2, IC, IB) and land use codes and/or Comprehensive Plan elements supporting the preservation of these uses, particularly when non conforming uses are a justification from removing the industrial designation from the zoning;
- Policy and actual impacts of Transit Oriented Development, and changes to the Puget Sound Regional Council’s Vision 2040 policies as they relate to Manufacturing Industrial Centers and freight mobility (Ballard-Interbay, Duwamish, North Tukwila);
- Policy and actual impacts of Transit Oriented Development as they impact freight routes designated by the WSDOT, and possible changes to the WA state Freight Master Plan and other policy issues governed by FMSIB/WSDOT for the impacted areas;
- Policy and actual impacts of Transit Oriented Development on the built environment, and possible changes to the King County Comprehensive Plan relating to urban industrial land use and freight mobility;

- Policy consideration of the contradictions between the following directives in the Early Scoping Information Report, and resolution on the basis of minimal impacts to the current land use and freight mobility policies referenced above:

*“Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development, station access, and modal integration in a manner **that is consistent with local land use plans.**” [emphasis ours],*

and (vs.):

*“Regional and local plans call for **increased residential** and employment density at and around HCT stations, and increased options for multi-modal access.”;*

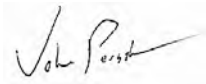
- Permanent and temporary construction impacts, and all operational impacts, and risk of displacement of all current marine, manufacturing, warehouse, and logistics economic activity within areas designated for Transit Oriented Development and all areas within 1/2 mile of the stations;
- Permanent and temporary construction impacts, and all operational impacts, concerning displacement of all current marine, manufacturing, warehouse, and logistics economic activity in areas between port/marine/rail terminals, and zones designated for Transit Oriented Development;
- Permanent and temporary construction impacts, and all operational impacts, in terms of restricting growth of maritime and marine activities generally within the Port of Seattle's land use and transportation footprint;
- Permanent and temporary construction impacts, and all operational impacts, for major freight corridors, including but not limited to Spokane Street, West Marginal Way, East Marginal Way, 1st Ave S., 4th Ave S., S Lander St., Holgate St., S. Royal Brougham Way, 6th Ave S., Airport Way S., Horton St., I-5, I-90, SR 99, SR 509, S. Michigan, and corresponding intersections/interchanges (including elements Phase 1 and proposed Phase 2 of the heavy haul corridor network);
- Permanent and temporary construction impacts, and all operational impacts, on parking on Spokane St., between 1st Ave S., and West Seattle Trail Fishing Dock under the Spokane St. viaduct (relating to current uses at 3440 East Marginal Way, parking for job dispatch), including the potential for “hide and ride”;
- Permanent and temporary construction impacts, and all operational impacts, on parking on East Marginal Way under SR 99, between Spokane St. and Horton St. (relating to current uses at 3440 East Marginal Way, parking for job dispatch), including the potential for “hide and ride”;

- Permanent and temporary construction impacts, and all operational impacts, for ingress/egress to Terminals 18 and 5, assuming peak capacity utilization for each, including streets leading to and from all gates at each terminal and Spokane St.;
- Permanent and temporary construction impacts, and all operational impacts, on ingress/egress to the BNSF SIG rail yards and Union Pacific rail yard;
- Permanent and temporary construction impacts, and all operational impacts, to operations and access to Terminal 86 (Louis-Dreyfus);
- Permanent and temporary construction impacts, and all operational impacts to cruise ship operations at Terminals 90/91 with regard to freight (stores) delivery, and passenger/ luggage transport to and from SeaTac International Airport, including Elliot/ 15th Ave W, currently utilized parking lots, and all practicable routes linking these, between the hours of 4am and 4pm;
- Permanent and temporary construction impacts, and all operational impacts to cruise ship operations at Terminal 66, with regard to practicable routes linking freight (stores) delivery, and passenger/luggage transport to and from SeaTac International Airport;
- Permanent and temporary construction impacts, and all operational impacts to and risk assessment of the economic displacement of maritime, manufacturing, warehouse, and logistics land use activity within the DMIC and BINMIC, and risks of loss of Port marine tenants at Terminals 18, 25, 30, 46, 90, and 91 (including terminal 90/91 “uplands”) resulting from such displacements;
- Permanent and temporary construction impacts, and all operational impacts on logistics supply chains within a three mile radius from dock side on all modes (truck and rail) from Terminals 5, 18, 25, 30, 46, and 105;
- Potential of industrial sprawl in suburban, exurban, and rural areas which may occur as a result of any displacement of industrial and logistics activity within the DMIC and BINMIC.
- Potential for disruption and displacement of activities at Terminal 18, due to permanent and temporary construction impacts, and all operational impacts, including, but not limited to: impacts of gate access, impacts to surface street queuing, impacts on terminal access for employees, impacts to international shipping schedules as a result of the aforementioned;
- Potential for disruption and displacement of activities at Terminal 5, due to permanent and temporary construction impacts, and all operational impacts including, but not limited to: disruption of terminal construction and modernization including time delays for Phase 2 construction of Terminal 5, impacts to gate access, impacts to surface street queuing, impacts on terminal access for employees, impacts to international shipping schedules as a result of the aforementioned;

- Permanent and temporary construction impacts, and all operational impacts that would disrupt dispatch activities for the workers employed by shippers and terminal operators in the Port of Seattle, from the ILWU 19 hiring hall facility at 3440 East Marginal Way S., including: delays that will result in late shift starts (and in turn, delay of international ship calls), construction impacts that will temporarily encumber employees from being present for AM and PM dispatch times for job assignments (5:30 am to 9:00 am, and from 4:00 pm to 6:00 pm, 7 days per week), and reduced parking for employment related meetings;
- Impacts to freight mobility, maritime activities, and the growth of these activities through the construction and operation of an elevated option over the ship canal, in comparison with the tunnel option.

Thank you for the opportunity to provide comment on this important and beneficial transportation project for the region.

Best,

A handwritten signature in black ink, appearing to read "John Persak", written over a light blue rectangular background.

John Persak
For the International Longshore and Warehouse Union Local 19

cc: MLK Labor, Mayor Jenny Durkan, CM Lisa Herbold, County CM Claudia Balducci, Port of Seattle Commission President Stephanie Bowman.

Communication ID: 343900

From: Bob Gillespie

Scoping Comment:

We've supported much of Sound Transit's work throughout this region, even that which has directly impacted, in a negative way, our properties on Lander Street in Seattle. As the agency considers Phase 3, we would like to add the support of our partnership, on behalf of the 120 employees in the eleven businesses we house, for an alignment that minimizes the already significant impact Phase one had on our businesses. It appears that an elevated station and alignment down the E3 busway can ease the impacts to existing business. It gives them an even chance of surviving the significant construction process that will occur in a few years.

Is it more expensive? Yes, but this has never been shown to be an impediment to Sound Transit's decision making process in the past. An elevated system will allow the vast potential that exists in private property around the SODO station to be realized on behalf of future residents of this area. A significant growth in jobs can be created in higher densities around future station development. As such, we favor what I believe is referred to as ST3 Representative Project Alternative Segment SODO.

Thank you

Bob Gillespie

Lander Street Partners LLC

P.O. Box 129, Bellevue 98009-0129

From: Ryan Smith <rsmith@martinsmith.com>
Sent: Tuesday, April 2, 2019 6:50 AM
To: WSB Scoping Comments <wsbscopingcomments@soundtransit.org>
Subject: ST3 Scoping Comments

Ms. Swift- Thank you for the opportunity to comment on the ST3 scoping. I'm writing in support of the important issues outlined in the scoping comment letter submitted by the Alliance for Pioneer Square.

As an owner of 5 buildings in Pioneer Square and one in SoDo, we care deeply that Sound Transit continue a thoughtful process to study all reasonable alternatives and their impacts, especially to these historic districts. The CID and Pioneer Square are important cultural and economic districts and require special consideration.

I also believe this program affords an important opportunity to connect our various transit modes with a thoughtful location and station design at King Street, which will benefit transit ridership significantly for all modes if done well.

Lastly, as an owner of several protected historic buildings in Pioneer Square which will be impacted by this project, I request to be a party to the Section 106 consultation process.

Respectfully,

Ryan Smith
Martin Smith Inc
1932 1st Ave
Suite 1000
Seattle, WA 98101
(206) 521-0506
On behalf of MSI Provident LLC,
MSI First & King LLC, Burke-State Bldg., LLC, and Drummond LLC



1711 13th Ave SW
Seattle, WA 98134

To: Sound Transit Board

Re: West Seattle -Ballard Link Light Rail Extension

Thank you for the opportunity to offer comment on the scope of review that will be conducted as part of the EIS process for the West Seattle -Ballard Link Light Rail Extension.

Since 1989 Maxum Petroleum has provided clean fuels and lubricants to the Puget Sound maritime and waterfront community. We are the sole supplier of fuel and lubricants to the Washington State Ferries as well as the King County passenger ferries, numerous tug boats, fishing vessels, and deep draft ships. Maxum operates a fuel pier, a fleet of tanker trucks, and vessels on the north end of Harbor Island. Maxum also operates two warehouses off Spokane Street near First Avenue.

The services that Maxum provide are a critical component of the areas transportation system, region's trade, maritime community, and the economic engine of our local, regional, and state economies.

For the West Seattle portion of the alignment, Maxum's concern is the location of the crossing of the Duwamish waterways. The current Blue Line which crosses north of the Spokane Street Corridor would have severe impacts on our business and our ability to supply necessary service to our maritime and waterfront customers which would have a cascading effect on the region's transportation and trade. During construction of such a Blue Line access on and off Harbor Island would be adversely impacted, causing backups of freight and the petroleum products necessary to the region. The Blue Line also goes right over the top of our leased warehouses off of Spokane Street which could lead us to lose needed storage, access to our products, and/or totally displace us from that location.

The impacts to the movement of container cargo and petroleum products, as well as other maritime operations by such a routing as the Blue Line over the Duwamish will have long-lasting economic and quality of life implications. Our understanding is that construction in public right of way would limit freight mobility for up to five years. That's five years that our service to vital transportation and trade customers would be impacted.

Maxum requests that the Board recognize the significant impact a Blue Line or north crossing would have on our business, the business of our customers, and the other maritime industrial businesses in the region. Maxum requests that a thorough assessment of those economic and transportation impacts be included in the scoping process to allow for true costs to be fully understood.

Maxum believes the expansion of Sound Transit is critical to a more efficient transportation system within our region. However, such expansion should not adversely affect other modes of transportation such as by the region's ferry system. Nor should it adversely affect the region's ability to move goods.

For the good of the community, the transportation system, the maritime industry, and our business, Maxum respectfully asks that the Board choose an alignment with a crossing south of Spokane Street as the preferred alternative.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dan Kovacich', positioned above a horizontal line.

Dan Kovacich
Maxum Petroleum Vice President of Marine Operations

A handwritten signature in blue ink, appearing to read 'Mike Auer', positioned above a horizontal line.

Mike Auer
Maxum Petroleum Environmental Compliance Manager



**Resolution in Support of the ST3 West Seattle Link that will be the Least
Disruptive to Maritime Activities**

Whereas: *The Sound Transit Board is currently considering the construction of the Sound Transit 3 (ST3) West Seattle Link (Downtown-SoDo-West Seattle) as part of a \$54bn project approved by the citizens of Pierce, Snohomish, and Martin Luther King Jr. County,*

Whereas, *this phase of construction will provide thousands of union jobs and apprenticeships for construction and other trades through 2035,*

Whereas, *Terminal 18 in the Port of Seattle, under the Northwest Seaport Alliance, also provides and supports thousands of union jobs in the maritime industry,*

Whereas, *the siting of the ST3 West Seattle Link east-west segment between Delridge and 1st Ave S. will impact freight mobility and cargo movement to and from Terminals 18 and a modernized Terminal 5 in 2024, due to construction impacts,*

Whereas, *we want the ST3 project completed on time with the maximum utilization of union labor, while preserving the viability of our marine terminals through mitigation,*

Whereas, *the proposed east-west routes, located south of S. Spokane St., provide the necessary balance of maximizing construction jobs and lessening impacts on marine terminal jobs and operations,*

And Whereas *Sound Transit will begin DEIS scoping in February of 2019 and make a determination by April 2019 for their preferred alternative for this route, and will need to consider mitigation in this determination,*

Be It Therefore Resolved,

That MLK Labor is on record in support of the ST3 West Seattle Link that will be the least disruptive to maritime activities during and after the construction phase, and will encourage the Sound Transit Board in selecting a preferred option least disruptive to Port maritime terminals and other cargo operations,

Be It Further Resolved, *That MLK Labor will educate our elected officials on the Sound Transit Board, the Sound Transit Elected Leadership Group, the Port of Seattle/Northwest Seaport Alliance, City of Seattle, MLK Jr County Council, and other government entities on the concerns raised herein,*

Be It Finally Resolved, *that MLK Labor shall communicate the intent of this resolution in writing to the above elected officials in a timely manner.*

Neptune Pacific and Associates, LLC.
P.O. Box 17464
Seattle, WA 98127

March 30, 2019

West Seattle and Ballard Link Extensions
c/o Lauren Swift, Sound Transit
South Jackson St.
Seattle, WA 98104

Re: Scoping Comments

To Whom It May Concern:

I write as a property owner in Interbay, whose family purchased the property at 3425-16th Ave W, Seattle, in the late 1970's and the adjacent lot to the north in the mid-1990's. Currently, the drawings for the Interbay light rail station is positioned on top of our property. Please consider the tunnel option to retain my family's property and negate negative effects it will have on the thriving industrial community of Interbay.

There is not much in the way of Industrial Land left in Seattle. In fact, evicted industrial businesses displaced by the South Lake Union development a few years ago attempted to relocate to Interbay. Unfortunately, only one business was able to do so because of extremely limited availability. If the light rail is built through the Interbay industrial community, the same displacement of businesses will occur. Additionally, the space beneath the bridge that is being considered for "use" will not be able to be used for industrial businesses. There are ideas about placing parks or green space under the bridge, but again this is taking away industrial area. Also, there will not be room for a light rail and Interbay industry to coexist unless a tunnel station is built. It is better to invest more money to implement an effective long-term plan, than it is to waste money on a bridge with expensive upkeep that is not environmentally friendly.

The tunnel solution will allow a long-term healthy relationship between Interbay industry, workers, owners and the clients of Seattle they serve. If people are not able to work locally or their business is not local because their jobs have been displaced by the light rail, you are effectively contributing to increased commute times and increasing the already horrendous Seattle traffic. Please reconsider the tunnel option; it will reduce noise and provide Interbay industrial workers with an alternate route to their work. Woohoo!!! This is a win-win for everyone!

Thank you for your consideration of preserving existing businesses that serve our Seattle communities. For the tunnel, please take a look at the already **city owned property** (south side of Bertona on 17th side) and other undeveloped property in the area, as a station. Thank you for your consideration.

Sincerely,

Kari Guddal - Managing Partner
Cell Phone: 206-790-1780

RECEIVED

APR 03 2019

**SOUND TRANSIT
LEGAL DEPT.**

LAW OFFICES OF
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MARC O. WINTERS

E-MAIL: MWINTERS@MCNAUL.COM
Direct (206) 389-9350

March 29, 2019

VIA EMAIL AND VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Sound Transit
Attn: Lauren Swift, Central Corridor Environmental Manager
401 S. Jackson Street
Seattle, WA 98104
Email: wsbscopingcomments@soundtransit.org

Re: Route and Station Alternatives for Ballard Light Rail Project

Dear Sound Transit:

We represent (a) Nickerson Investments L.L.C., the owner of a self-storage facility located at 1300 West Nickerson Street, Seattle, Washington 98119, commonly known as Bolt Modern Storage, and (b) 1515 Leary Way Associates LLC, the owner of a self-storage facility located at 1515 NW Leary Way, Seattle, Washington 98107, also commonly known as Bolt Modern Storage.

Nickerson Investments L.L.C. and 1515 Leary Way Associates LLC are referred to collectively as the "Owners". The above self-storage facilities are referred to as the "Bolt Storage Facilities".

The Bolt Storage Facilities are family-owned businesses that have been serving the Queen Anne and Ballard communities for many years. The Bolt Storage Facilities are proud to serve all segments of the Seattle community, including low-income and military families. The success of the Bolt Storage Facilities is highly dependent on their customers having safe and unobstructed vehicular and pedestrian access for loading and unloading of stored goods. The Bolt Storage Facilities are bounded by heavily traveled streets and the Ballard Bridge, and operate in very space-constricted environments.

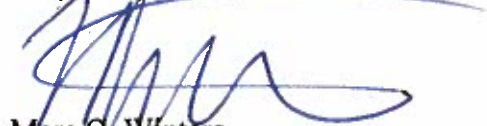
These businesses succeed because of both easy physical access for drivers and visibility from the 15th Avenue West arterial roadway. Any obstruction of either of these benefits, or any other encroachments or interruptions, will have a significant detrimental effect on the viability of the Bolt Storage Facilities. Even a temporary interruption in the operating efficiency of the Bolt Storage Facilities caused by construction of light rail would be highly damaging.

Furthermore, the Bolt Storage Facilities are unique and irreplaceable. No amount of cash compensation would enable the Owners to relocate these businesses because of the unique and unavailable combination of access and visibility to the arterial roadway, coupled with light industrial zoning in a retail environment. Any condemnation of any portion of either Facility would destroy these important locally-owned businesses.

Accordingly, the Owners wish to voice their strong objections to any light rail designs for the Ballard extension which would pass on, over, through or adjacent to either of the Bolt Storage Facilities. For these reasons, the Owners believe that the tunnel option would be highly preferred.

Please let us know if you have any questions. Thank you for your attention to this matter.

Very Truly Yours,



Marc O. Winters

MOW/mow

cc: Tom Nickerson

April 2, 2019
Sound Transit
c/o Lauren Swift
401 S. Jackson St.
Seattle, WA 98104

Email to: wsbscopingcomments@soundtransit.org

Subject: Sound Transit Ballard Link Extension Scoping, April 2019

Stakeholder Advisory Group, Elected Leadership Group, and Sound Transit Board Members:

On behalf of the North Seattle Industrial Association (NSIA) we appreciate the presentations and information provided by Sound Transit staff. We understand that Sound Transit is requesting comments on the West Seattle and Ballard Link Extensions; Purpose and Need, alternatives development, the ST3 representative project, and impacts or benefits seen under elements of an Environmental Impact Statement (EIS).

The Ballard Link Extension enters the heart of one of Seattle's major industrial centers that supports approximately 73,000 jobs, contributes 24% of B&O taxes and 32% of taxable sales. Industrial lands must be protected in order to maintain this important segment of the economy. The maritime industry sectors are dependent on proximity to each other; the loss of one industry as a direct impact will impact other maritime industries with loss of services. In other words, there are industries that cannot be relocated and maintain a viable maritime industry.

The maritime industry, industrial sector and the Port of Seattle are dependent on an efficient transportation system. The movement of freight is a vital component of transportation and the economy. Industrial lands, freight movement, truck mobility, and safety for all modes requires that the unique characteristics of an industrial environment and unique characteristics of freight movement and truck mobility be addressed through all elements of project development.

Our comments are provided below relative to the Purpose and Need, the ST3 Representative Project Ballard Extension, the Alternatives Development Report, February 2019, the visualizations and alternative alignments provided on Sound Transit's project website, and elements of an EIS. We requested engineering plan sheets to review potential impacts to industrial lands but only received links to the alignments provided on the project web site. We understand from Sound Transit staff that the design work is at a very "high-level" of conceptual design. We have an overarching concern that the level of conceptual design is not adequate in level of detail to select a preferred alternative.

Request to include 20th/Tunnel Level 2 Alternative in the EIS

The NSIA sees clear environmental benefit to the tunnel options. We have significant concerns with the impacts to both maritime industries, the displacement of Coastal Transportation, and to 15th Avenue NW as a major truck route serving the Ballard Interbay Northend Manufacturing and Industrial Center (BINMIC). The industries in the BINMIC cannot tolerate further erosion

of capacity and mobility for truck movement on 15th Avenue NW. A light rail station on 20th Avenue NW would be more compatible with the City of Seattle comprehensive plan and policies and serve the heart of the Ballard community. The evaluation criteria and summary tables in the *West Seattle and Ballard Link Extensions, Level 2 Alternatives Development and Screening*, October 2018 lack transparency in disclosing why the alternative was dropped. Significant environmental, land use, and rider benefits are achieved with the 20th/Tunnel Alternative (and a station on 20th Avenue NW). The distinguishing factor is the cost, which is based on only a very conceptual level cost estimate. We encourage you to distinguish between “Agency Preferred Alternatives” (that could include costs) and “Environmentally Preferred Alternative” (that should not include costs) as Sound Transit moves forward with the EIS.

Purpose and Need

The current Project purpose and need statement is entirely focused on regional need for alternative modal travel. We support the purpose of the project to provide regional mobility and carry the increasing travel demand by light rail to reduce future traffic demand on city streets. However, a major infrastructure project with local funding must also be consistent with adopted plans and programs. We offer the following additions to the Purpose and Need due to the proximity of the Ballard Interbay Northend Manufacturing and Industrial Center (BINMIC) and industrial lands within the project area.

Purpose:

Modify the third bullet to include manufacturing/industrial centers as follows:

- Connect regional growth centers and manufacturing/industrial centers as described in adopted regional & local land use, transportation, and economic development plans and Sound Transit’s Regional Transit Long-Range Plan

Please add the following bullet to the Purpose & Need statement:

- Build and operate the light rail extension to preserve and protect the industrial economy by protecting industrial lands and local and regional freight mobility. Protect freight routes to ensure safe operations, improved travel time and reliability of goods movement to, within and between Seattle’s MICs and urban villages.

Need:

- Minimize conflict between truck and nonmotorized modes to protect public safety.

ST3 Representative Project – Ballard Extension

The Elliott Avenue W and 15th Avenue W/NW corridor, the aorta of our community, has 63,800 vehicles crossing the Ballard Bridge (<https://data.seattle.gov/Transportation/Traffic-Counts/3dfs-acmc/data>), over double the traffic of Martin Luther King Way South. Truck volume on 15th Avenue W/NW is approximately 5,000 per day south of the Ballard Bridge and 2,500 per day north of the Bridge. (City of Seattle Freight Master Plan, 2014) The corridor has become congested on a daily basis and is becoming more so. The Interbay neighborhood is projected to grow similarly. North-south corridors are limited in Seattle and the Ballard Bridge is limited in

capacity to carry traffic while open and further restricts traffic during maritime closings. Our concerns with the representative project are listed below.

1. An at-grade alignment within the 15th Avenue W/NW corridor will severely limit local and regional mobility for truck movements to and from industrial lands both during construction and permanently. A reduction in mobility, with increasing traffic congestion due to planned growth, is intolerable.
2. The NSIA prefers the alignment to the west of 15th Avenue W/NW through the Interbay segment.
3. Bridge piers in an elevated section are either closely spaced, and therefore limit surface street mobility and restrict turn lanes or have longer spacing which greatly increases the size and cost of the super structure. Taller elevated segments result in longer elevated segments. There can be no assumptions about the impacts or cost of elevated segments without an advanced level of design.
4. Traffic impacts during construction, within the 15th Avenue W/NW corridor, will occur for multiple years. The impacts to the industrial economy could reach devastating consequences. There are no equivalent parallel corridors to serve large trucks (WB-67) and over-legal trucks.
5. A reduction in capacity on the Elliott Avenue W and 15th Avenue W/NW arterials is unacceptable to the industrial, maritime, and freight community.
6. There are no comparable north-south routes that provide the same level of utility for the BINMIC and transportation needs between the MICs, the regional economy, the national economy, and the maritime industry. Therefore all surface street capacity and mobility must be maintained.
7. We are concerned that the real costs of a bridge alternative over the Lake Washington Ship Canals are unknown. Numerous design and construction constraints must be considered including but not limited to; salmon habitat and migration, the ultimate location with dimensions of a reconstructed Ballard Bridge, at-grade touch down points and aerial distance before touchdown, and the resulting pier placements. A structure adjacent to the Ballard Bridge could limit access for future repairs or replacement of the Ballard Bridge.

Alternatives Development – Elevated

The NSIA has serious concerns that the level of design does not provided adequate information to understand the impacts and costs of the elevated alternative. Sound Transit staff stated in a briefing to the NSIA on March 26, 2019 that the columns and foundations for the elevated structure and bridge across Salmon Bay were only conceptual and that the actual location and size were still unknown. We request that additional design and cost estimating be prepared before selecting the preferred alternative. We have the following concerns. The final route must enhance, and not diminish, the current and potential future traffic and truck carrying capacity of the entire 15th Avenue W/NW corridor, both during and after construction,

1. Truck mobility must be maintained, or improved, for truck trips within, to, and from, the BINMIC. Access by trucks to industrial areas must not be restricted,
2. Station location alternatives should be developed to minimize conflict with truck movements.

3. The benefits or impacts to freight and truck mobility should be a key comparison of project alternatives.
4. A tunnel alternative should be considered to minimize impacts during and after construction. The length of time of construction should be a key consideration of traffic and congestion impacts.
5. A bridge alternative should be developed that fully accounts for environmental impacts and mitigation and maximum reliability (minimize bridge openings) in order to fully account for costs of an elevated alternative relative to the tunnel alternative.
6. A tunnel alternative could provide the benefit of moving spoils by barge, reducing costs relative to other tunnel projects and resulting fewer carbon emissions than moving by truck.
7. Examine the reliability of Link service *and* the reliability of the Elliott Avenue W and 15th Avenue W/NW corridor for freight movement in the analysis of benefits and impacts and compare alternatives.
8. Cost estimates of tunnel construction could be lower by the time bids are requested for the tunnel construction due to rapidly advancing tunnel technology. While we would not expect Sound Transit to make this assumption, this potential further highlights the need for additional design work and cost estimating to be able to evaluate the clear tunnel benefits relative to an incremental cost increase, which could be paid by a third party.

Elements of an Environmental Impact Statement

Transportation

1. Plans and Policies
 - a) Evaluate relevant plans and policies from Seattle's Comprehensive Plan relevant to the BINMIC and industrial land uses across alternatives.
 - b) Evaluate relevant plans and policies from Seattle's Transportation plan relevant to the BINMIC and industrial land uses.
 - c) Present and summarize Seattle's Freight Master Plan, present the freight network, and truck streets, over-legal routes, and connections to routes for hazardous materials transport. 15th Avenue W/NW provides connection to Alaskan Way the only north-south route for hazardous materials through Seattle.
 - d) Identify spot and corridor freight improvements in the Freight Master Plan within the project area, in particular on 15th Avenue W/NW. Ensure that these projects can be completed with the project alternative.
2. Arterials and Local Streets
 - a) All changes in geometrics or channelization and redistribution of traffic and truck volumes that occur with the project alternatives should include an analysis of impacts to truck mobility (circulation, geometrics, capacity, traffic volume by time of day, and increase in travel time for truck movements).
3. Freight Mobility and Access
 - a) Document truck street classifications; 15th Avenue W/NW is a major truck street, a seaport highway connector, and one of two north-south over-legal routes through Seattle.

- b) Document truck volumes by vehicle classification on streets within the study area.
 - c) Provide truck volume data by time of day for all approaches to study intersections and all intersections that could be affected by the project alternative.
 - d) Prepare level of service analysis for the peak hour of truck volume for all intersections with classified truck streets.
 - e) Ensure that intersection level of service analysis accounts for future bus volumes, bus priority signalization and pedestrian volumes.
 - f) For arterials with an increase in traffic volume, provide an estimate of the increase in truck travel delay during the AM and PM peak hours, and the peak hour of truck traffic.
 - g) Evaluate and compare for each alternative the hours of the day with LOS F congestion on the facilities that cross the Lake Washington Ship Canal and include estimates of delay with bridge openings.
 - h) Identify all changes to truck access at driveways, and including any turn restrictions that alter access to industrial areas.
 - i) Show street and arterial design for elevated and at-grade segments. Ensure that modifications to 15th Avenue W/NW integrate improvements in the Freight Master Plan.
 - j) Document the existing rail line across the Lake Washington Ship Canal and evaluate any potential impacts with project alternatives.
 - k) Document the Fishing Vessel Owners Association (FVOA) and their two marine ways that are directly west of the bridge. These two rail systems (300 ton and 500 ton) haul, about 50 vessels/year for repair on land, and FVOA works on about 50 vessels/year in the water. The proposed light rail bridge should be designed to a level that will disclose if the columns for the light rail aerial structure touch down on the areas leased to FVOA and impacts avoided through design.
4. Safety
- a) Identify intersection and driveway conflict points at locations used by trucks and non-motorized vehicles.
 - b) Evaluate sight distance at locations identified above.
 - c) Collect truck volume data by time of day at locations identified above and forecast truck volumes. Estimate nonmotorized volume at locations identified above.
 - d) Identify any increase in risk to safety as in conflict with Seattle's Vision Zero plan.
5. Construction Impacts
- a) Given the length of time of construction; and the economic sensitivity of industrial lands to traffic, congestion, and mobility; prepare the above analysis for impacts during construction.
 - b) Prepare and present construction constraints and the resulting construction time and phasing for the proposed bridge over the Lake Washington Ship Canal. Use ecosystem data and information of fish habitat and fish migration, and pre-design of the bridge structure to determine a feasible construction plan given the construction complexity and constraints.

6. Indirect and Cumulative Impacts
 - a) Include freight travel and truck mobility in the analysis of indirect and cumulative impacts.
7. Mitigation
 - a) Identify mitigation for identified decrease in truck mobility.
 - b) Evaluate potential impacts of mitigation measures to truck mobility.

Acquisitions, Displacements, and Relocations

1. Analysis should include the interdependency of industrial businesses and the dependency of industrial businesses on a working waterfront. The loss of one business may create a subsequent loss of interdependent businesses.
2. Analysis should include the potential for economic impacts on industrial lands to induce acquisitions, displacements, and relocations.

Land Use

1. Clearly present the geographic area of the BINMIC.
2. Clearly present the interdependent industrial land uses between the BINMIC and all other industrial areas in Seattle and regionally.
3. Clearly present the interdependent industrial land uses, their dependency on the Seattle's freight corridors and a working waterfront.
4. Clearly present the freight network, truck volumes, and explain how freight movement on the freight network relates to the industrial land uses.
5. Identify how any impacts to truck mobility caused by the project impacts the BINMIC industrial land uses.
6. Present City of Seattle Comprehensive Plan policies relevant to the BINMIC and industrial land uses. For example, LU 10.16 that states, "Prohibit uses that attract large numbers of people to the industrial area for nonindustrial purposes, in order to keep the focus on industrial activity and to minimize potential conflicts from the noise, nighttime activity, and truck movement that accompanies industrial activity."
7. Evaluate the potential for station locations to open up the industrial areas to non-industrial uses which we oppose.
8. Evaluate and present the City of Seattle neighborhood plan and policies for the Ballard/Interbay Northend Manufacturing & Industrial Center (BINMIC). The policies are quite thorough and provide clear policy direction to provide truck and freight mobility through and within the BINMIC.
9. BINMIC is headquarters to the North Pacific fishing fleet with vessels homeport at facilities on the Lake Washington Ship Canal and including Fishermen's Terminal. Northwest Seaport plans for Fishermen's Terminal should be considered with each alternative. The plans include expanding the on-site roster of suppliers that serve the fishing fleets. Transportation, economic, and all other relevant elements of and EIS should be evaluated with any impacts to Fishermen's Terminal and connecting transportation facilities (roadway, water, rail).
10. The influence of station design and transit-oriented development on land use.
11. Prepare a design that results in no net loss of industrial lands.

Economics

1. Provide relevant economic data for the BINMIC including the quantity of industrial lands, types of industry, number of jobs and level of pay, and contribution to the regional economy.
2. Provide relevant economic data for the maritime industry, which is of regional and national importance.
3. Evaluate economic impacts on industrial lands and the maritime industry due to; acquisitions, displacements, and relocations, and whether or not these impacts can be mitigated.
4. Evaluate economic impacts of decreased truck mobility and additional travel time impacts locally and regionally.

Social Impacts, Community Facilities, and Neighborhoods

1. Present and evaluate City of Seattle Comprehensive Plan policies relevant to protecting industrial jobs.
2. Evaluate the impacts of job loss due to economic and land use impact to industrial lands.
3. Evaluate the importance of the industrial community to the Ballard neighborhood.

Air Quality

1. Evaluate changes in local truck movement due to project alternatives and the potential increase truck travel and idle time on the street network and at intersections.
2. Evaluate increase in truck travel time for regional movements due to reduction in capacity along alternative routes, and include this analysis in air quality analysis.
3. Evaluate impacts described above for the peak of truck travel.

Ecosystems

1. Prepare analysis to present fish habitat and migration information and data in and through the Lake Washington Ship Canal. Prepare adequate level of design for the proposed bridge over the Lake Washington Ship Canal to understand and disclose the length and phases of construction needed to avoid impacts to fish habitat and migration.

Energy Impacts

1. Include the factors described above for Air Quality to identify the increased energy consumption of increased truck travel, truck delay, and truck idling.

Hazardous Materials

1. Identify the existing movement of hazardous materials from industrial land uses.
2. Identify the effect of mobility impacts, locally and regionally, on the movement of hazardous materials.
3. Identify alternative movement of hazardous materials due to any restrictions to hazardous materials resulting from the project; including local constraints and reduction in capacity within alternative corridors.
4. Identify reasonable mitigation of any Acquisitions, Displacements, and Relocations of industrial land uses with movement of hazardous materials.

Environmental Justice

1. Evaluate environmental and social justice impacts to industrial jobs.

Conclusions

The concerns presented for the elevated alternative lead us to understand that the elevated alternative will increase in cost with further design and the relative cost to a tunnel alternative would narrow. The tunnel alternative provides significant benefits to protection of the industrial lands and maritime industry, the environment, and fish habitat. The benefits and real cost to achieve that benefit relative to the real cost of an elevated alternative should be well understood before selection of a preferred alternative.

In summary, we request that freight movement and truck mobility be considered throughout the alternatives develop and analysis of the proposed project due to the significant industrial and maritime land use in the project area. The economic value of these lands and industrial jobs warrants protection while evaluating alternatives for the Link light rail extension to Ballard.

The NSIA recommends development of alternative alignments and greater transparency in presentation of the environmental benefits of alternatives. Cost estimates should be based on a higher level of design - preliminary engineering- to provide more accurate information for the public and decision-makers. Alternatives should consider a corridor to the west of 15th Avenue W/NW; crossing the ship canal by means of a tunnel and construction an underground station in Ballard in the vicinity of 20th Avenue NW.

Sincerely,



Mr. Eugene Wasserman, President
North Seattle Industrial Association
3500 1st NW
Seattle, WA 98107

Copies: Mayor Jenny Durkan, City of Seattle

Seattle City Council Members: Bruce Harrell, Lisa Herbold, Kshama Sawant,
Rob Johnson, Debora Juarez, Mike O'Brien, Sally Bagshaw, Teresa Mosqueda,
Lorena González
Seattle Freight Advisory Board via Chris Eaves, SDOT Advisory Board Liaison



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*Promoting the
Recreational Boating
Industry in the
Pacific Northwest*

April 2, 2019

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

Via Email: WSBScopingComments@SoundTransit.org

Attn.: Sound Transit Board of Directors
Elected Leadership Group, WSBL
Stakeholder Advisory Group, WSBL
WSBL Stakeholders

Re: Sound Transit West Seattle Ballard Link Extension ("WSBL") Alignment Alternatives

Dear Sound Transit Board Members, Elected Leadership Group, Stakeholder Advisory Group, and other WSBL stakeholders:

The Northwest Marine Trade Association ("NMTA") submits the following comments on the West Seattle to Ballard extension crossing. NMTA requests that the Sound Transit Board of Directors, the Elected Leadership Group and the Stakeholder Advisory Group (SAG) closely consider these comments.

NMTA appreciates the role of the SAG and is pleased that Peter Schrappen, NMTA's Vice President, was invited to serve on this committee.

NMTA represents over 735 businesses in the recreational boating industry. This sector represents \$6.9 billion in overall economic activity. The state has 240,000 registered boats and these boats are built, serviced, painted, repaired throughout Washington state. The companies that perform these services comprise NMTA. The majority of NMTA's members are in Puget Sound and a majority of this cohort are in the Seattle area, and in particular Ballard. Each of these small businesses serve or rely on the flow of maritime commerce.

As you know, maritime businesses are critical to Washington's economy, generating \$30 billion in revenues in 2012, and employing roughly 148,000 workers. Maritime employers in the Seattle area include passenger transportation; tug and barge operators, boat and ship building, repair, and maintenance; maritime logistics and shipping; fishing and seafood products; and maritime support services.

The maritime sector acts like an ecosystem, meaning what affects one subset of this sector affects the entire industry. Recreational boating businesses service commercial fishing boats for example.

As the project proposes to cross two of the region's largest and most productive industrial zones (Manufacturing Industrial Centers [MICs]), the project purpose

should acknowledge that no harm should come to facilities and operations in these areas essential to delivery of the Port's mission.

With respect to the West Seattle and Harbor Island portion, please take into account the impacts to container cargo and other maritime operations on the Duwamish River. NMTA members like the Port of Seattle and Delta Marine reside in this area. Disruptions to this maritime community would have long-lasting economic and quality of life implications. Competition for this cargo occurs in a global arena. Shippers eye even the possibility of short and long-term disruption as reason to use other gateways like Long Beach, California or Canadian ports. As you know, disruptions impact the employers' ability to both maintain and grow businesses and to provide the family-wage jobs our region depends on.

For the West Seattle portion of the alignment, our concern is the location of the crossing on the Duwamish. As you have read in the Port of Seattle letter, the concerns are many and the threats are real if this option is selected. More specifically, construction in public right of way would limit freight mobility for up to five years.

NMTA ask that the Board recognize the significant impact a north crossing would have on maritime industrial businesses in the region and include a thorough assessment of those impacts in the scoping process to allow for a true reckoning of costs, including short and long-term mitigation.

For these reasons, we ask that the Board choose an alignment with a crossing south of Spokane Street as the preferred alternative, and/or ensure that such an alignment is included in the environmental review.

Regarding the alternative routes proposed for the 4th Avenue east of CenturyLink Field & Event Center, I would "second" the comments you received from Ms. Ann Kawaski and Mr. David Young on March 28. As mentioned in their letter, CenturyLink field hosts 125 non-sporting events a year and one of their marquee events is the Seattle Boat Show, which NMTA owns and produces. This attraction draws over 50,000 attendees and provides the venue for over 50% of the sales (or more) for many of the 325 member businesses that exhibit. While we are excited about extended light rail, we echo their sentiments that this facility be taken a focal point as the project moves forward. Please consult with the Seattle Mariners and CenturyLink Field & Event Center's teams all along the way. They are tremendous partners with us and will keep us abreast of any developments. As you reach out to them, they will have our interests in mind.

In their letter, they point out that the event-related traffic is not just for attendees. The Seattle Boat Show regularly has fifty-plus trucks and trailers using the arterials to load the boats into CenturyLink Field & Event Center. We rely on 4th Avenue for ingress and egress to CenturyLink Field & Event Center. As Ms. Kawaski and Mr. Young proffer, "we encourage Sound Transit to select as its preferred alternative a route that avoids having a crippling effect on traffic in south downtown, and not significantly and adversely affect operations at CenturyLink Field."

As for the Ballard Link Extension, Sound Transit is looking at three options when it comes to the crossing of the Ship Canal. NMTA opposes the high-level bridge alignment because of the impact it will have on cargo handling that Coastal and Salmon Bay Terminal articulated to you on their January 30, 2019 letter to this august group.

NMTA strongly favors the passage beneath the Ship Canal. This tunnel route would lead to less frustration for all stakeholders and will have the least impact on the flow of maritime commerce. The maritime and Ballard business community stand united on this preference.

Thank you for giving NMTA the opportunity to weigh in on this critical project. We stand by ready to assist you in any manner you deem helpful.

Thank you for your attention,

A handwritten signature in black ink, appearing to read 'Peter Schrappe', written over the printed name.

Peter Schrappe, CAE

Vice President & Director of Government Affairs
Northwest Marine Trade Association

Communication ID: 351645

From: Northwest Studio

Scoping Comment:

EIS SCOPING COMMENT

WEST SEATTLE TRIANGLE

northwest studio

architects urban designers

1402 3rd ave, no 808, seattle, wa 98101

206.788.8155

www.northweststudio.com

To: West Seattle and Ballard Link Extensions

c/o Lauren Swift

Sound Transit

401 S. Jackson St.

Seattle, WA 98104

From: Northwest Studio, on behalf of Lynn Sweeney.

RE: EIS Scoping Comment: Avalon Station

Date: April 1, 2019

Over four generations, the Sweeney family has assembled over 3.5 acres of property spanning six blocks in the West Seattle Triangle. The two northernmost blocks are currently home to the Alki Lumber & Hardware Co and adjacent to the future Avalon Station, indicated by the Level 3 Alternatives developed for the Ballard to West Seattle Link Extension. Together with three additional Sweeney-owned blocks to the South that front both sides of 36th Ave SW, and one to the West along Fauntleroy Ave SW, these Alki Lumber sites form an unparalleled opportunity to provide new housing options, business spaces, and public realm improvements that can bring new riders to the Sound Transit network.

The Sweeney family has initiated Seattle's Master Use Permit process for the Alki Lumber sites, utilizing their full lot area and development potential, and it has begun a holistic master planning process for all of its properties in the Triangle, outlining key relationships and synergies that will tie each to the other in terms of program and expectations related to the delivery of potential benefits to the community, commercial tenants, and residents.

Of the Level 3 Alternatives, an underground station at Avalon best supports the City's, Sound Transit's, and local community's goals for the neighborhood. It provides significant opportunities for TOD surrounding the station it offers great potential for people-focused urban design and placemaking; and it limits potential impacts to businesses and residents during construction and beyond.

Conversely, any elevated guideway, which would include large concrete structural bents and an overhead station, would have permanent deleterious impacts to the neighborhood and TOD potential, generating noise and vibration concerns, casting deep shadows, obstructing cherished views, and creating significant obstacles to pedestrian and vehicular mobility and urban design character, directly contravening the City's desire to "integrate Fauntleroy Way in the neighborhood physically, aesthetically, and operationally, while at the same time maintaining its arterial functions."²

We look forward to working with Sound Transit through the EIS process to develop a common vision between our two projects that can continue to best serve the West Seattle community for future generations to come.

1 Reference City of Seattle Actions, Goals, and Policies:

"Action 5: Create partnerships with transit, developers/owners, and regional agencies to align TOD goals and actions," City

of Seattle Department of Planning and Development, "Implementing Transit Oriented Development in Seattle: Assessment

and Recommendations for Action," August 2013.

"Encourage opportunities to provide affordable market rate housing in the neighborhood for Junction workers," Seattle

Comprehensive Plan, Policy WSJ-P15.

Reference Sound Transit Goals: "Resolution R2018-10 Adopting an Equitable Transit Oriented Development Policy"

"2.1.1 Goal Increase the value and effectiveness of transit by increasing transit ridership."

"2.1.5 Encourage the creation of diverse housing options near transit with priority to affordability

"2.1.6 Encourage convenient, safe, Multimodal access to the transit system with an emphasis on nonmotorized access." 2 City of Seattle Comprehensive Plan, Policy WSJ-P8.



NUCOR STEEL SEATTLE, INC.
2424 SW Andover Street
Seattle, WA 98106-1100
206.933.2222

April 1, 2019

TO: Sound Transit Stakeholder Advisory Group
Sound Transit Elected Leaders Group
Sound Transit Board

Via Email: wsbscopingcomments@soundtransit.org

Subject: Sound Transit Environmental Impact Statement (EIS) Scoping Comments for the West Seattle – Ballard Light Rail Extension

On behalf of Nucor Steel Seattle, Inc. (Nucor), as well as General Recycling of Washington, LLC. (GRW), thank you for the opportunity to provide scoping comments to begin the environmental review for the West Seattle-Ballard Light Link Rail Extension.

The Nucor facility is a steel mill located at 2424 SW Andover St. that has been a part of the West Seattle community since 1905. It is the largest recycling facility in the state of Washington and supplies both private and public construction projects throughout the Pacific Northwest with responsibly-produced steel products. The GRW facility is located at 4260 W Marginal Way SW. It is primarily a scrap steel receiving and sorting facility that supports the recycling activities at the steel mill. Both facilities' existence is heavily dependent on road, rail, and marine freight mobility.

Nucor and GRW combine to provide over 320 direct living wage jobs as well as over a thousand industrial, maritime, and transportation jobs in the greater Puget Sound area. The industrial, maritime, and transportation sector that Nucor, GRW, and their various support vendors occupy are extremely important components of a diversified economy that provides living wage jobs, and does so in an increasingly expensive city. While Nucor and GRW support expansion of light rail, we believe that careful attention must be paid to the potential impacts to the industrial and maritime operations in and around the Duwamish River Valley both during and after construction of the extension.

The two decisions in particular that directly affect Nucor and GRW are the ones related to the Duwamish River crossing and the siting of the Delridge Station, which are both described below. Nucor and GRW respectfully request that the draft EIS comprehensively reviews potential impacts to our operations as well as opportunities to modify the project plans to avoid or minimize these impacts.

Duwamish Crossing

Currently there are two potential Duwamish River crossings under study. Both crossings parallel the West Seattle Bridge, one north of the bridge and one south.

Either crossing has potential to disrupt both Nucor and GRW's operation through construction and operation impacts to freight mobility. Because of the Nucor facility's reliance on the Delridge connection to the West Seattle Bridge for the majority of the inbound and outbound freight to the facility, carefully studying and minimizing the traffic impacts is critical for the continued existence of our operation. Additionally, the route between Nucor and GRW's location and the ability to maintain the movement of material via truck and rail between the two facilities is critical. Finally, GRW also operates a dock facility that receives and loads both barges and ocean going vessels which makes maintaining existing draft and beam clearances of the current West Seattle Bridge both during and after construction necessary for our operation.

Nucor and GRW are particularly concerned about impacts from a north crossing of the Duwamish River. The current route associated with a North crossing runs through the Nucor property. The Nucor facility is sited on a very small footprint for a steel mill and is already logistically constrained. Additional loss of property both during and after construction would be detrimental to the facility in its current operation. It would also prohibit expansion and modernization, which are necessary for survival in the globally competitive market that we serve. A north crossing also has a greater potential impact to the Delridge-Chelan-Marginal-Spokane intersection, which is vital for GRW, Nucor, and several other businesses in the industrial and maritime sector.

An early alternative (referred to as the Purple Line), currently eliminated in evaluation, contained a crossing of the Duwamish River directly through the middle of the GRW facility. While not currently being considered, both Nucor and GRW maintain that this would have debilitating impacts to our operations both during and after construction.

Delridge Station Siting

The current Representative Line has the Delridge Station sited in the public-right-of-way north of Andover Street adjacent to the Nucor mill, while several other options have the station sited south of Andover Street.

The north of Andover location, both during and after construction, would make the efficient movement of freight vital to the mill's success, nearly impossible. The Delridge-Andover intersection is already highly problematic for freight movement today. Additional busses, bicycles and pedestrians all converging to a station north of Andover would not only greatly constrain freight movement but create significant safety risks for the community and commuters.

The economic impact to the Nucor mill of a north of Andover station location would be significant and put the mill's ability to continue operations in jeopardy. The result would have a significant economic impact to Nucor teammates and local living wage jobs, Nucor suppliers and vendors, community organizations, and the region's tax base.

In summary, we ask for the Sound Transit Board to recognize the significant impacts a north crossing would have on our operations as well as other industrial and maritime activities in the area, and the impacts of siting the Delridge Station north of Andover, by including a thorough assessment of those impacts in the scoping process to allow for a true reflection of costs, including short and long-term mitigation.

For these reasons, we ask the Sound Transit Board to choose an alignment with a crossing south of the West Seattle Bridge and siting the Delridge Station south of Andover Street as the preferred alternative for the EIS process, or ensure that such an alignment is included in the environmental review.

Nucor Steel Seattle, Inc. and General Recycling of Washington, LLC. look forward to working with the Stakeholder Advisory Group, the Sound Transit Elected Leadership Group and the Sound Transit Board, as it brings light rail to the West Seattle community. Nucor Steel Seattle would welcome further discussion on any of the remaining alternatives in the near future as a final decision is reached.

Sincerely,

A handwritten signature in black ink, reading "Matthew J. Lyons". The signature is fluid and cursive, with the first name "Matthew" and last name "Lyons" clearly legible.

Mathew J. Lyons
Vice President and General Manager
Nucor Steel Seattle, Inc.



April 2, 2019

Thank you for the opportunity to offer comment on the scope of review that will be conducted as part of the EIS process for the West Seattle - Ballard Link Light Rail Extension.

I write to you on behalf of PCC Logistics, a business that supports container terminal maritime industrial jobs and is a crucial component of the economic engine this sector represents to our local, regional, and state economies.

Impacts to container cargo and other maritime operations on the Duwamish have long-lasting economic and quality of life implications. Competition for this cargo remains fierce, and shippers see even the possibility of short and long-term disruption as a reason to utilize other gateways. These disruptions affect our ability as an employer to both maintain and grow our business and to provide the family-wage jobs our region depends on.

The transit services provided now and in the future by Sound Transit are critical to our ability to move goods more efficiently – efficient freight movement depends on an efficient transportation system, and we want to partner with you as you move forward into the next century.

For the West Seattle portion of the alignment, our concern is the location of the crossing of the Duwamish. A crossing north of the Spokane Street Corridor directly impact congestion in the gate entrances at both T-18 and T-5, which will be operational by your startup date.

PCC Logistics is located at 3629 Duwamish Avenue South Seattle, WA. This location has been offering support services to the shippers that use the Port of Seattle marine terminals for the past 8 years. PCC has operated at different locations in the Port of Seattle for over 20 years.

Our Duwamish facility provides rail unload and reload operations to the largest exporters and importers in the U.S. We provide many different services in the port, including rail and container trans-loading, truck to container trans-loads, and containers to trucks headed into the mid-west. We also offer reworking services for damaged containers to all of the terminals in the Port of Seattle and all of the steam ship lines. Our location is ideal for providing prompt and reliable services to all of the shippers using this port.

PCC has operations in Seattle, Tacoma, Oakland and LA. That level of coverage has made us the go-to provider for a majority of shippers of both Imports and Exports.

Construction in public right-of-way would limit freight mobility for up to five years. If either the north or south side of Spokane Street is chosen, the effect will be detrimental to the main terminals in the Port of Seattle, as truck traffic and gate congestion are already recurring issues.



The closure of T-46 to be converted to a cruise ship terminal is just beginning now and those volumes will be shifting to T-18 for the short term. Once the retrofit of T-5 is complete, those steamship lines will shift to T-5. This has been assured by the signing of a 30 year contract with SSA to operate T-5 along with their \$250 million commitment to retrofit the terminal. All of this is very positive for the growth of the Port of Seattle.

Washington and surrounding states all the way into the Midwest are responsible for feeding a larger percentage of the world's population this is dependent on the smooth operation of the port. As we saw in the last labor disruption the impact to the Apple industry over one season was in the billions. The construction is expected to last years and in my opinion will have long lasting effect.

We ask that the Board recognize the significant impact a north crossing and south crossing in close proximity to Spokane Street would have on maritime industrial businesses in the region and include a thorough assessment of those impacts in the scoping process to allow for a true reckoning of costs – including short and long-term mitigation.

For these reasons, we ask that the Board choose an alignment with a crossing well south of Spokane Street as the preferred alternative for the EIS, and ensure that such an alignment is included in the environmental review.

This is why I support the Pigeon Ridge West Seattle tunnel route. I believe it has the least effect on the economic engine that is the Port of Seattle and the many businesses that would be affected along Spokane Street. This route would also give you more room for future expansion without affecting the port.

Placing the light rail along the Spokane Street, whether it emendate north or emendate south of Spokane Street would have a long lasting impact on the port.

While I understand the cost is one factor that is always looked at in projects of this magnitude, that does not always take into account the long-term effects and costs. I truly believe that any added obstructions along the Spokane Street / West Seattle Bridge would be short-sighted. The construction of this project for the 5-year period would greatly affect the through-put of the trucks for both T-18 and T-5, and the infrastructure for all service providers in the area would be impacted.

I have not seen an estimated life expectancy for this light rail project, but I would suspect that when the route is chosen and built it will be there until the mountain takes it out. 100-150 years depending on the quality controls that is put in place now to ensure its long use.



Subways in use around the world year built:

Moscow	opening date	1935	84 years old
Tokyo	opening date	1927	92 years old
Buenos Aires	opening date	1913	106 years old
New York City	opening date	1904	115 years old
Paris	opening date	1900	119 years old
Glasgow	opening date	1896	123 years old
London	opening date	1893	156 years old

As you look over these dates above in some of the greatest cities on the planet, you know that those Transit projects have not stayed static since the day they cut the ribbon. They have been in an ever- expanding process of improvement. If we can learn from that and allow for change and growth long- term for the future users of this light rail, this will provide us with flexibility to deal with growth and modernization for decades to come.

Let's say our ability to build projects like this has improved over the last 150 years. If so we should be able to expect this project will achieve at least 150 years of service, and the cost over that time period to have it away for the port and not affecting the port long term would be well worth the investment. This would also allow for more flexibility in the expansion in the decades to come that may not even be on the radar at this time.

I have an example of what I would call one of the greatest failures of forethought in our area and also one of the greatest achievements at the same time.

The Washington State Convention Center is one of the best complexes on the west coast, providing a great venue for many events as well as many jobs, and it brings in revenue for the City in a big way. Since its first event took place in 1988 it has been a huge economic success- a major factor in the growth of downtown with many hotels, countless restaurants, and jobs.

But I have to ask the question: is there anyone involved with this light rail project that does not recognize what the impact of that facility has had on transportation since its completion? I hate to be someone who looks back and says we could have done something differently, but I am not sure how I-5 was over-looked. What would it have taken to marry that economic juggernaut and provide a formula for the growth of I-5?



You go from 6 north bound lanes to 2 and this is the same for south bound 6 down to 2 lanes.

In my opinion, short-term goals were all that were being considered. We need to learn from that and not make that same mistake with this project.

Please take your time and let's make the best long term decision that will provide for the long term growth of the Port of Seattle.

Thank you for your consideration of my letter.

Al Muehlenbruch
Business Unit Manager
PCC Logistics
3629 Duwamish Ave S.
Seattle WA, 98134
Tel: 206-805-0220
Fax: 206-805-1484
Cell: 253-606-7037
Email: al@pcc.cc
Website: www.pcclogistics.com

PACIFIC INVESTMENT CO.

2201 SIXTH AVE. S. • SEATTLE, WA 98134 • (206) 622-6288 • FAX (206) 622-6282
stack@nwlink.com

March 28, 2019

West Seattle and Ballard Link Extensions
C/o Lauren Swift @ Sound Transit
401 S. Jackson St.
Seattle WA. 98104

Dear Ms. Swift:

Please accept these comments regarding the EIS Scoping request related to SODO Station and the new rail lines coming in from West Seattle.

I represent the Stack family, owners in control of 7.6 acres of mixed use properties adjacent to SODO Station. These comments represent not only our family's interest but a coalition of neighbors and tenants, signed below, who would be equally impacted by Sound Transit's proposed design. We wish to enhance your perspective of how our neighborhood works and the vision shared by long term owners/operators/tenants that rely on fluent access in and out of SODO. There are serious adverse impacts expected from the current proposed design. We seek substantial improvements that will pay off in significant long term function for neighboring businesses, create a safer, more desirable transportation hub, and enhance light rail ridership.

Please note - no one endorsing this letter approves of the proposed truck/ car/ pedestrian overpasses on Lander and Holgate Streets.

Gensler Architects was commissioned to do a thoughtful study of Sodo Station.....the results of which have been submitted to Sound Transit staff but also enclosed with this letter. That design work promoting an all-elevated SODO station is the basis for our comments below.

- Request elevating both sets of tracks from Forest St. to north of Holgate to enhance free flow of vehicle traffic at ground level serving the majority of travelers and pedestrians. This allows better grade level activation for current businesses and future economic development around the station which in turn will promote ridership. This allows far greater access to businesses fronting both sides of Lander and Holgate Streets.
- Elevated tracks will allow the Station to be conveniently closer to Lander Street and create quicker connections to Metro station on the E-3. A traditional street scene at grade will allow user-friendly Uber/Lyft/taxi/loading zone connectivity. Preservation of the E-3 Busway is possible which keeps busses on a dedicated roadbeda positive for METRO and equates to a huge traffic reliever. Bike Path can be preserved as well.
- Since light rail is a destination type of use, an elevated platform can be attractively signed and accessed from Lander, whereas cars cannot drop off riders from an overpass. With current design, we have unknown provision for grade access. Station access not fluent and safety concerns arise with Pedestrians at 4th or 6th Avenues South not wanting to hike an overpass then descend via steps to grade when they can jaywalk or shortcut over tracks. Safety greatly diminished with Agency's design.

- Overpass construction will severely impede commerce for a 1.5-2 year building period. Street parking to serve businesses and access mass transit options will be curtailed. Post Office parking garage will be cut off from Lander. Passenger drop off and pedestrian access to Sodo Station during overpass construction diminished, thus reducing ridership. Post construction of overpass, there appears no way to access Station driving E-bound on Lander. Massive concrete structures will create shadowy imposing barriers, feeling of an unsafe neighborhood, offer graffiti tagging targets and sheltered areas for the transient population, thus diminished security. Vehicle access to drop off area will be reduced unless large takings of private property occur. Pedestrian access from Station area to overpass requires hike up stairs /escalator, then down the ramp,..... so again, many will tempt fate and shortcut over ground level tracks to access surrounding streets and busses now displaced to 4th Ave. S. Visual blockage from overpass creates unfriendly, trapped feeling by pedestrians.....please note, Alaskan Way viaduct is coming down now to create a pedestrian-friendly ambiance.
- Future TOD will be more effective if clear at-grade vehicle access is available to serve the Station, inter-modal connections, shops and restaurants. A pedestrian-friendly ground floor will appeal to all neighbors and not just transit users headed up to elevated platforms. Again, the intent should be to build a destination service that people will frequent for multiple reasons and no matter the location up or down.
- Construction can be phased to maintain existing service. See Gensler plan. East-West travel/commerce on Lander and Holgate suffer far less interruption with elevated track construction, not-to-mention permanent unfettered access at grade once overhead tracks completed. Additionally, the USPS parking garage access is preserved.
- Sound Transit's original Representative Plan called for elevated tracks from West Seattle so some form of elevated railway was budgeted and vetted. Eliminating construction of 2 costly overpass projects would contribute untold efficiencies to SODO businesses and preserve E-W travel for private, Postal Service, and emergency response vehicles. Lander and Holgate E-W corridors should not be lost even for the period of construction.

Elevated tracks at SODO Station can be built. The above articulations, with reference to the Gensler plan, will help create a friendlier, aesthetic neighborhood street scene around this transit hub asset, especially with future City sanctioned TOD. All parties..... S-T, Metro, cyclists, manufacturers, local service and distribution businesses can gain efficiencies by building light rail the right way. Cutting corners in SODO, just because there are few residential voices here is not in the best long term interest of the city and its taxpayers.

Your thoughtful consideration of the above siting and design issues is greatly appreciated. The future of our neighborhood, the tax base created, the prospects for greater employment, investing toward a fluent working neighborhood..... will all lead to enhanced ridership at a successful SODO Station.

Neighbors in concurrence have acknowledged on attached pages.

Very truly yours,



Robert Stack

ATTCH.

ENCL.

ATTACHMENT TO EIS SCOPING COMMENTS BY ROBERT STACK LETTER DATED MARCH 27, 2019

The below signed property owners and tenants in SODO acknowledge and concur with the scoping comments and recommendations offered in the above referenced letter.

Check: Owner ☒ Tenant ☐ Check: Owner ☐ Tenant ☐
Landlord or Business LANDER STREET PARTNERS Landlord or Business _____
Property Address 505/545/555 SOUTH LANE Property Address _____
Signature [Signature] Signature _____
Printed 3-28-19 Title OWNER Printed _____ Title _____
(BOB GILLESPIE)

Check: Owner ☒ Tenant ☐ Check: Owner ☐ Tenant ☐
Landlord or Business AMERICAN LIFE INSURANCE Landlord or Business _____
Property Address 270 S. HANCOCK ST Property Address _____
Signature [Signature] Signature _____
Printed G. J. Starbuck Title President Printed _____ Title _____

Check: Owner ☐ Tenant ☐ Check: Owner ☐ Tenant ☐
Landlord or Business _____ Landlord or Business _____
Property Address _____ Property Address _____
Signature _____ Signature _____
Printed _____ Title _____ Printed _____ Title _____

Check: Owner ☐ Tenant ☐ Check: Owner ☐ Tenant ☐
Landlord or Business _____ Landlord or Business _____
Property Address _____ Property Address _____
Signature _____ Signature _____
Printed _____ Title _____ Printed _____ Title _____

ATTACHMENT TO EIS SCOPING COMMENTS BY ROBERT STACK LETTER DATED MARCH 27, 2019

The below signed property owners and tenants in SODO acknowledge and concur with the scoping comments and recommendations offered in the above referenced letter.

Check: Owner ☒ Tenant ☐

Landlord or Business Sixth & Stacy, LLC

Property Address 2400 6th Ave S.

Signature [Signature]

Printed Scott Soules Title Member

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☒ Tenant ☐

Landlord or Business Eighth & Stacy, LLC

Property Address 737 S. Stacy St.

Signature [Signature]

Printed Scott Soules Title Member

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☒ Tenant ☐

Landlord or Business Eighth & Stacy, LLC

Property Address 2401 8th Ave S.

Signature [Signature]

Printed Scott Soules Title Member

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

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Check: Owner ☒ Tenant ☐

Check: Owner ☐ Tenant ☐

Landlord or Business LANDER STREET PARTNERS Landlord or Business _____

Property Address 505/545/555 SOUTH LANE Property Address _____

Signature [Signature] Signature _____

Printed 3-28-19 Title OWNER Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Check: Owner ☐ Tenant ☐

Landlord or Business _____ Landlord or Business _____

Property Address _____ Property Address _____

Signature _____ Signature _____

Printed _____ Title _____ Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Check: Owner ☐ Tenant ☐

Landlord or Business _____ Landlord or Business _____

Property Address _____ Property Address _____

Signature _____ Signature _____

Printed _____ Title _____ Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Check: Owner ☐ Tenant ☐

Landlord or Business _____ Landlord or Business _____

Property Address _____ Property Address _____

Signature _____ Signature _____

Printed _____ Title _____ Printed _____ Title _____

ATTACHMENT TO EIS SCOPING COMMENTS BY ROBERT STACK LETTER DATED MARCH 27, 2019

The below signed property owners and tenants in SODO acknowledge and concur with the scoping comments and recommendations offered in the above referenced letter.

Check: Owner ☒ Tenant ☐

Landlord or Business 19506 Leves

Property Address 19506 Leves

Signature [Signature]

Printed BREDVIK Title Mgr

(JOHN BREDVIK)

Check: Owner ☒ Tenant ☐

Landlord or Business 4400 4th Ave

Property Address 4400 4th Ave

Signature [Signature]

Printed BREDVIK Title Mgr

Check: Owner ☒ Tenant ☐

Landlord or Business INDUSTRIAL

Property Address 650 INDUSTRIAL

Signature [Signature]

Printed BREDVIK Title Mgr

Check: Owner ☐ Tenant ☐

Landlord or Business Hercules Freight

Property Address 2201 6th Ave So

Signature [Signature]

Printed Haveman Title T.M.

Terminal Mgr.

Check: Owner ☒ Tenant ☐

Landlord or Business 201 S. ALASKA

Property Address 201 S. ALASKA

Signature [Signature]

Printed BREDVIK Title Mgr

Check: Owner ☐ Tenant ☒

Landlord or Business Food Services of America

Property Address 2201 6th Ave S.

Signature [Signature]

Printed Greg Gearhart Title Manager

Check: Owner ☐ Tenant ☒

Landlord or Business Western Safety Products

Property Address 5056 Lander

Signature [Signature]

Printed Neil Radtke Title President

Check: Owner ☒ Tenant ☐

Landlord or Business Ben's Cleaner

Property Address 2221 4th Ave So.

Signature [Signature]

Printed Gordon Meyer Title Pres

ATTACHMENT TO EIS SCOPING COMMENTS BY ROBERT STACK LETTER DATED MARCH 27, 2019

The below signed property owners and tenants in SODO acknowledge and concur with the scoping comments and recommendations offered in the above referenced letter.

Check: Owner ☒ Tenant ☐
Landlord or Business Alco Investment Company
Property Address 3300 and 3400 6th Ave. South
Signature Douglas C. Rosen
Printed Douglas C. Rosen Title President

Check: Owner ☒ Tenant ☐
Landlord or Business Rosen Investment Company
Property Address 3223, 3301, 3317, 3405, 3200
Signature Douglas C. Rosen 6th Ave. South
Printed Douglas C. Rosen Title Managing Member

Check: Owner ☐ Tenant ☐
Landlord or Business _____
Property Address _____
Signature _____
Printed _____ Title _____

Check: Owner ☐ Tenant ☐
Landlord or Business _____
Property Address _____
Signature _____
Printed _____ Title _____

Check: Owner ☐ Tenant ☐
Landlord or Business _____
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Check: Owner ☐ Tenant ☐
Landlord or Business _____
Property Address _____
Signature _____
Printed _____ Title _____

ATTACHMENT TO EIS SCOPING COMMENTS BY ROBERT STACK LETTER DATED MARCH 27, 2019

The below signed property owners and tenants in SODO acknowledge and concur with the scoping comments and recommendations offered in the above referenced letter.

Check: Owner ☒ Tenant ☐

Landlord or Business So Forest, LLC

Property Address 2900 4th Ave. S.

Signature 

Printed William OSEVAN Title OWNER

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☒ Tenant ☐

Landlord or Business OFLP, LLC

Property Address 2930 1st Ave. S.

Signature 

Printed William OSEVAN Title OWNER

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☒ Tenant ☐

Landlord or Business Dakota St. Assoc. LLC

Property Address 4100 1st Ave. So.

Signature 

Printed William OSEVAN Title Manager

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

ATTACHMENT TO EIS SCOPING COMMENTS BY ROBERT STACK LETTER DATED MARCH 27, 2019

The below signed property owners and tenants in SODO acknowledge and concur with the scoping comments and recommendations offered in the above referenced letter.

Check: Owner ☒ Tenant ☐

Landlord or Business Eden Investment Company

Property Address 1000 1st Ave

Signature [Signature]

Printed Wanil D. Edor Title Pres.

Owner of six buildings in SODO with 10 tenants.

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

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Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

ATTACHMENT TO EIS SCOPING COMMENTS BY ROBERT STACK LETTER DATED MARCH 27, 2019

The below signed property owners and tenants in SODO acknowledge and concur with the scoping comments and recommendations offered in the above referenced letter.

Check: Owner ☒ Tenant ☐

Landlord or Business Starbucks Center

Property Address 2421 Utah Ave S

Signature Peter A. Nitzee

Printed Peter A. Nitzee Title Member

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

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Landlord or Business _____

Property Address _____

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Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

ATTACHMENT TO EIS SCOPING COMMENTS BY ROBERT STACK LETTER DATED MARCH 27, 2019

The below signed property owners and tenants in SODO acknowledge and concur with the scoping comments and recommendations offered in the above referenced letter.

Check: Owner <input checked="" type="checkbox"/> Tenant <input type="checkbox"/>	Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>
Landlord or Business <u>Jervens Realty Corp.</u>	Landlord or Business _____
Property Address <u>2200 6th Ave South</u>	Property Address _____
Signature <u>[Signature]</u>	Signature _____
Printed <u>Matthew Bean</u> Title <u>SVP</u>	Printed _____ Title _____

Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>	Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>
Landlord or Business _____	Landlord or Business _____
Property Address _____	Property Address _____
Signature _____	Signature _____
Printed _____ Title _____	Printed _____ Title _____

Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>	Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>
Landlord or Business _____	Landlord or Business _____
Property Address _____	Property Address _____
Signature _____	Signature _____
Printed _____ Title _____	Printed _____ Title _____

Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>	Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>
Landlord or Business _____	Landlord or Business _____
Property Address _____	Property Address _____
Signature _____	Signature _____
Printed _____ Title _____	Printed _____ Title _____

ATTACHMENT TO EIS SCOPING COMMENTS BY ROBERT STACK LETTER DATED MARCH 27, 2019

The below signed property owners and tenants in SODO acknowledge and concur with the scoping comments and recommendations offered in the above referenced letter.

Check: Owner <u>X</u> Tenant _____	Check: Owner _____ Tenant _____
Landlord or Business <u>Commercial Filter Sales</u>	Landlord or Business _____
Property Address <u>2715 6th AVE S.</u>	Property Address _____
Signature <u>[Signature]</u>	Signature _____
Printed <u>Jesse Sheppard</u> Title _____	Printed _____ Title _____

Check: Owner _____ Tenant _____	Check: Owner _____ Tenant _____
Landlord or Business _____	Landlord or Business _____
Property Address _____	Property Address _____
Signature _____	Signature _____
Printed _____ Title _____	Printed _____ Title _____

Check: Owner _____ Tenant _____	Check: Owner _____ Tenant _____
Landlord or Business _____	Landlord or Business _____
Property Address _____	Property Address _____
Signature _____	Signature _____
Printed _____ Title _____	Printed _____ Title _____

Check: Owner _____ Tenant _____	Check: Owner _____ Tenant _____
Landlord or Business _____	Landlord or Business _____
Property Address _____	Property Address _____
Signature _____	Signature _____
Printed _____ Title _____	Printed _____ Title _____

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The below signed property owners and tenants in SODO acknowledge and concur with the scoping comments and recommendations offered in the above referenced letter.

Check: Owner <input checked="" type="checkbox"/> Tenant <input type="checkbox"/>	Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>
Landlord or Business <u>COMMERCIAL FILTER</u>	Landlord or Business _____
Property Address <u>2715 6th AVE So</u>	Property Address _____
Signature <u>[Signature]</u>	Signature _____
Printed <u>JAMES SHEPARD</u> Title <u>PRESIDENT</u>	Printed _____ Title _____

Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>	Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>
Landlord or Business _____	Landlord or Business _____
Property Address _____	Property Address _____
Signature _____	Signature _____
Printed _____ Title _____	Printed _____ Title _____

Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>	Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>
Landlord or Business _____	Landlord or Business _____
Property Address _____	Property Address _____
Signature _____	Signature _____
Printed _____ Title _____	Printed _____ Title _____

Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>	Check: Owner <input type="checkbox"/> Tenant <input type="checkbox"/>
Landlord or Business _____	Landlord or Business _____
Property Address _____	Property Address _____
Signature _____	Signature _____
Printed _____ Title _____	Printed _____ Title _____

ATTACHMENT TO EIS SCOPING COMMENTS BY ROBERT STACK LETTER DATED MARCH 27, 2019

The below signed property owners and tenants in SODO acknowledge and concur with the scoping comments and recommendations offered in the above referenced letter.

Check: Owner___ Tenant___

Landlord or Business KIDDER MATTHEWS

Property Address MULTIPLE-MANAGED ASSETS

Signature [Signature]

Printed JAMES C. LOVSTED Title Sr. VP

MANAGER OF OWNERS

Check: Owner___ Tenant___ Manager X

Landlord or Business Kidder Matthews

Property Address Several SODO properties

Signature [Signature]

Printed Andrew Hicks Title V.P.

Check: Owner___ Tenant___

Landlord or Business Platt Electric

Property Address 2757 6th Ave S

Signature [Signature]

Printed D. Schwartz Title Manager

Check: Owner___ Tenant___ X

Landlord or Business MacMillan-Piper, Inc

Property Address 1762 6th Ave S

Signature [Signature]

Printed Suzanne Tilley Title Compliance + Assets Manager

Check: Owner X Tenant___

Landlord or Business HANAUER Properties

Property Address 1964 4th AVE. S.

Signature [Signature]

Printed JEFFREY LONG Title MGR.

Check: Owner___ Tenant___

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner___ Tenant___

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner___ Tenant___

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

ATTACHMENT TO EIS SCOPING COMMENTS BY ROBERT STACK LETTER DATED MARCH 27, 2019

The below signed property owners and tenants in SODO acknowledge and concur with the scoping comments and recommendations offered in the above referenced letter.

Check: Owner ☒ Tenant ☒

Landlord or Business Equus Wine Merchants

Property Address American Life Ins

Signature Donald R Ayres

Printed Donald R Ayres Title Sr. VP Prop. mgmt

Check: Owner ☒ Tenant ☒

Landlord or Business Emerald City Trapeze Arts

Property Address American Life Ins

Signature Donald R Ayres

Printed Donald R Ayres Title Sr. VP Prop. mgmt

Check: Owner ☐ Tenant ☐

Landlord or Business AMPark inc

Property Address American Life Ins

Signature Donald R Ayres

Printed Donald R Ayres Title Sr. VP Prop. mgmt

Check: Owner ☒ Tenant ☐

Landlord or Business 624 S. Lande Industrial Properties

Property Address 624 S. Lande

Signature Donald R Ayres

Printed Donald R Ayres Title Sr. VP Prop. mgmt

Check: Owner ☒ Tenant ☒

Landlord or Business Budget Rental Trucks

Property Address 2730 4th Ave S.

Signature Donald R Ayres

Printed Donald R Ayres Title Sr. VP Prop. mgmt

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

Check: Owner ☐ Tenant ☐

Landlord or Business _____

Property Address _____

Signature _____

Printed _____ Title _____

BELIEVE.

SODO GATEWAY

CATALYZING FUTURE DEVELOPMENT WITH A TOD

MAR 6, 2019

STACK | Gensler

| Table of Contents

1. SODO Opportunities and Constraints
2. Project Vision
3. Station Configuration
4. New Zoning...



1 | SODO Today



1 | SODO Tomorrow

▼ Safe environment
for walking + biking



▼ Modern industry feeling



▼ Mixed commercial uses that
complement existing businesses



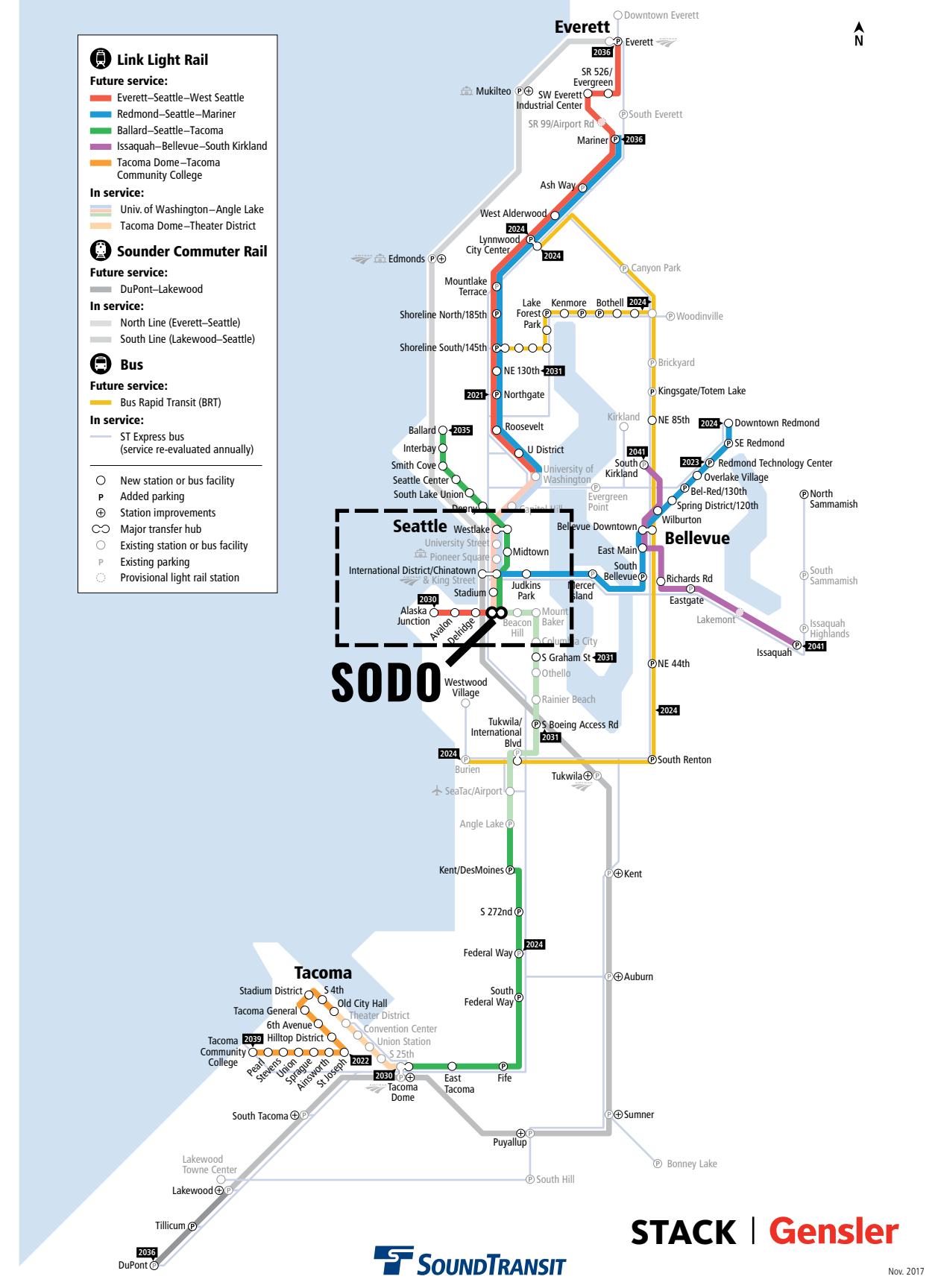
▲ Higher density for a true TOD

Benefits the wider community ►

▲ Vibrant and attractive as a destination

1 | SODO Opportunity for a True TOD

- 10-min away from downtown
- **New Transfer Hub** (Elevated / Surface under study)
- Potential for **Increased Height / Density** to serve the area

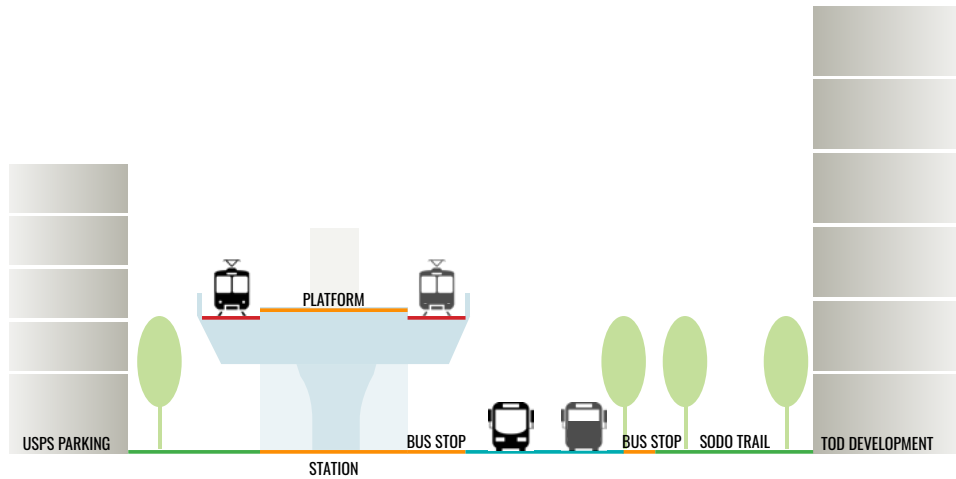


2 | Project Vision **Transformation into a Destination**

Create a vibrant Transit-Oriented Development (TOD) with mixed commercial uses that support regional transit plans, encourage station area activities in a safe environment, promote job growth of the city, and provide benefits to the wider community.



3 | Station Configuration Options Evaluation

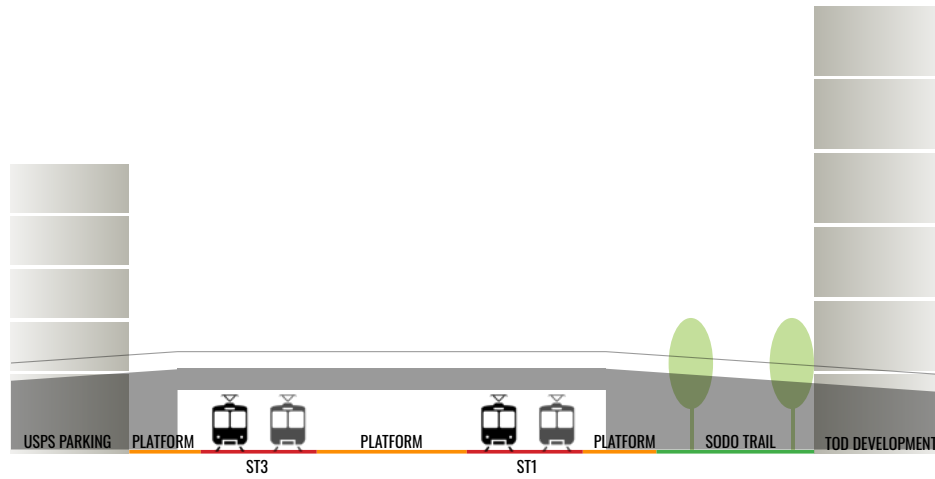


Option 1

Original ST Representative Plan

Conflict not resolved
Potentially re-route to 6th Ave S, buses share street with cars
Potential for activation
No change
No change

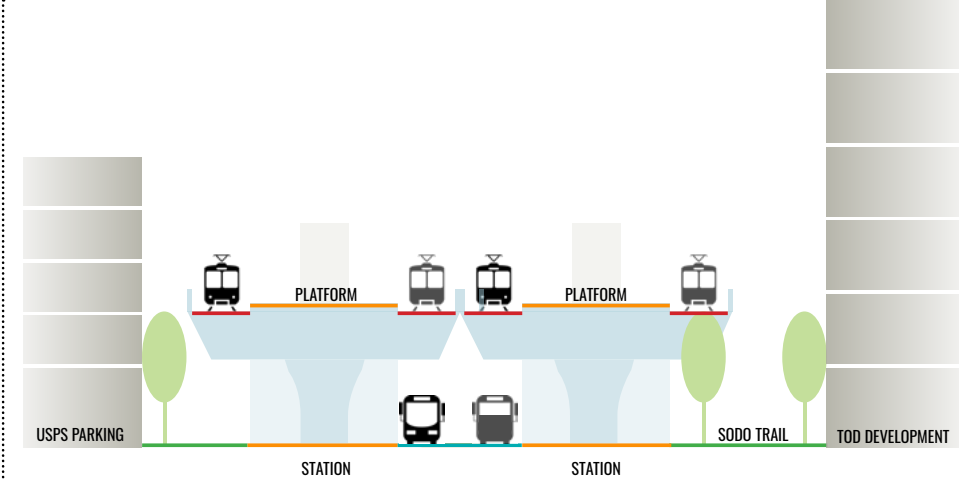
Desirable Undesirable



Option 2

Current ST Alternatives

No conflict: S Lander St Overpass
Potentially re-route to 6th Ave S, buses share street with cars
No more frontage on S Lander St
Close or re-grade to connect
Through stairs / elevators



Option 3

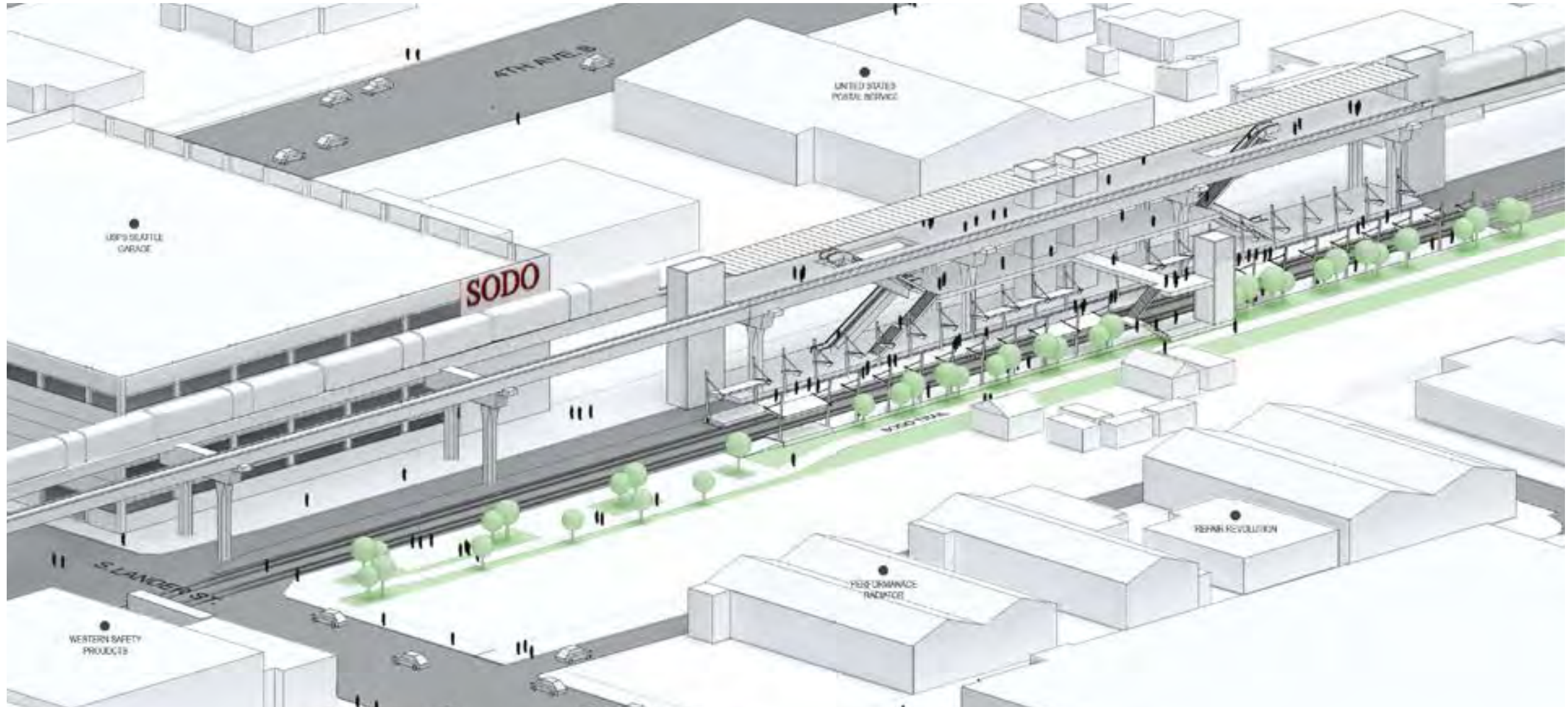
Full Metro / ST Intermodal Plan

No conflict: Tracks elevated
No change
Potential for activation
No change
No change

3

Station Configuration

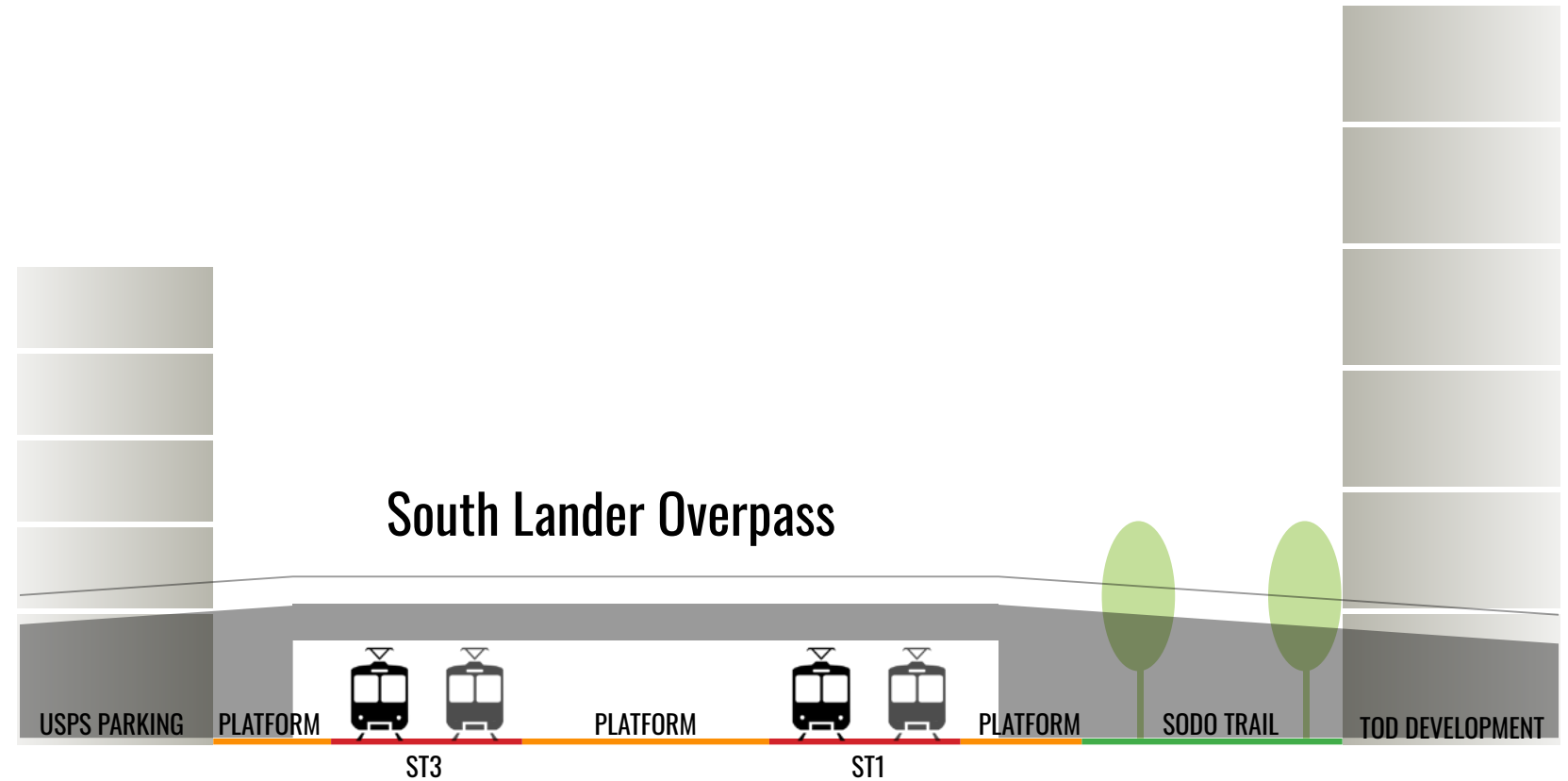
Current ST3 Representative Project / Intersection



3 | Station Configuration

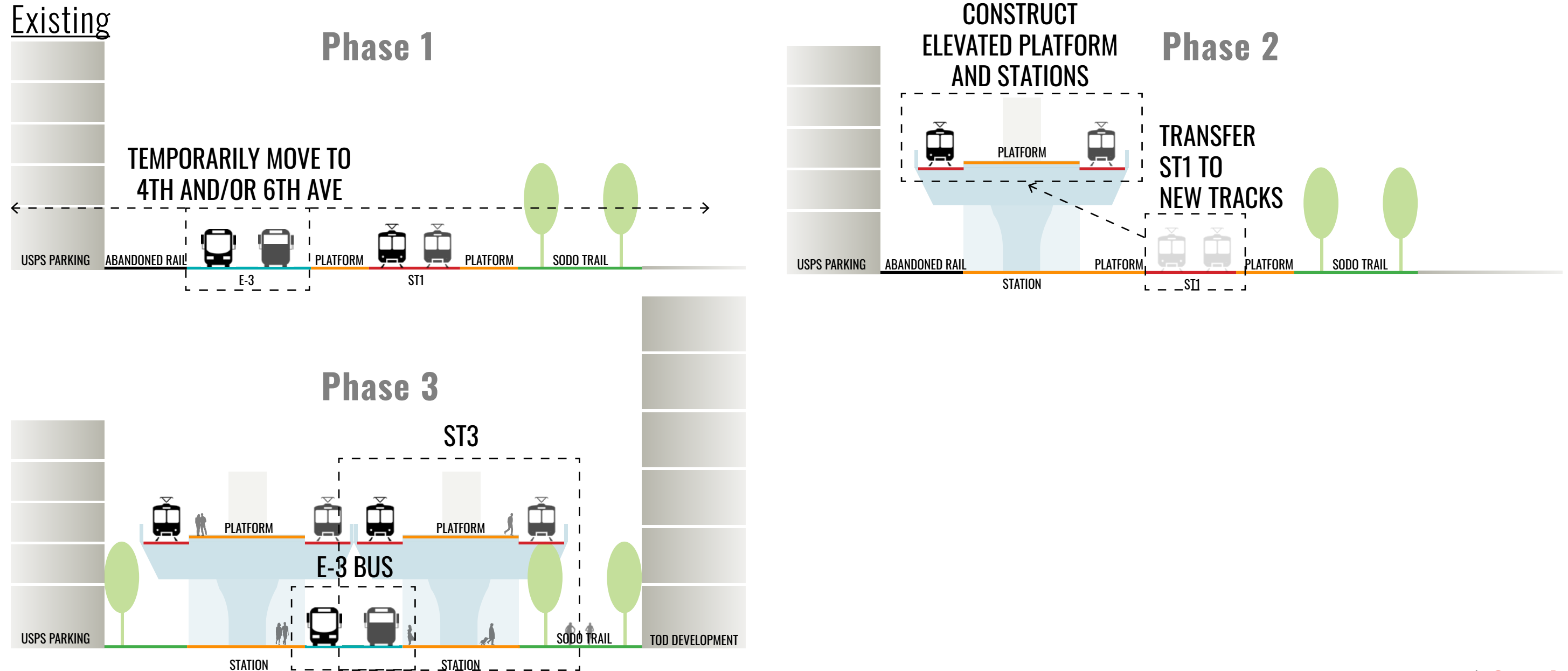
ST3 Alternative Project

- Moves E3 to surface streets
- Removes SODO trail bike path
- Restricts ground floor activation
- Difficult intermodal connections
- Overpass is a barrier chopping up neighborhood



3 | Station Configuration

Proposed Alignment - No Disruption in Link Service



4 | New Zoning... **Higher Density Through Station Area Overlay**

Bike / Pedestrian Connections



Vibrant and Attractive as a Destination



Ground Floor Activation - Convenience Retail



Higher Density for a True TOD

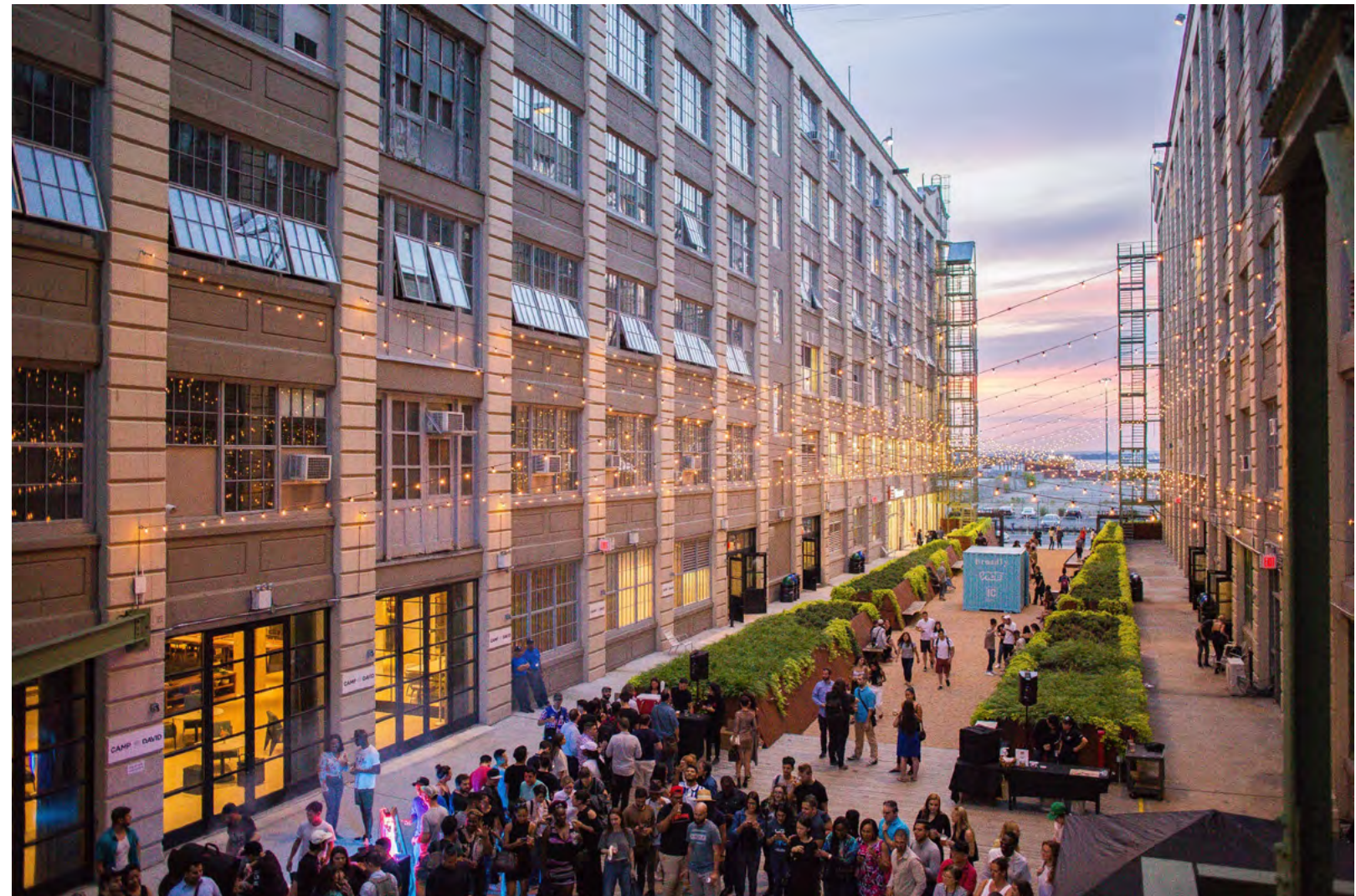


- Convenience Retail
- Manufacturing
- Office @ 3.0 FAR
- Office @ 5-8.0 FAR

4 | New Zoning... **Creates Higher Density to Bring Vitality and Safety**



Industry City, Brooklyn



March 27, 2019

Elected Leadership Group
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Members of the Sound Transit Elected Leadership Group,

Re: West Seattle Sound Transit 3 Alignment

Thank you for the opportunity to offer comment on the scope of review that will be conducted as part of the EIS process for the West Seattle -Ballard Link Light Rail Extension. The Pacific Merchant Shipping Association (PMSA) represents marine terminal operators and vessel lines that serve the West Coast. The proposed alignments for study to West Seattle will likely impact our member companies' ability to operate at 2 of the Port of Seattle's container terminals. Mitigation of impacts will therefore be an important aspect of both scope of study and the eventual decision on the best alternative.

Impacts to container cargo and other maritime operations on the Duwamish have long-lasting economic and quality of life implications. Competition for this cargo remains fierce, and shippers see even the possibility of short- and long-term disruption as reason to utilize other gateways. These disruptions impact our member companies' ability to both maintain and grow our businesses and to provide the family-wage jobs our region depends on.

For the West Seattle portion of the alignment, our concern is the location of the crossing of the Duwamish and Harbor Island area and all waterside and landside impacts to ships, barges, tugs, trucks, rail and all on dock operations both during and post construction. PMSA asks that the Board recognize the significant potential impacts of the alternatives discussed thus far on maritime industrial businesses in the region and include a thorough assessment of those impacts in the scoping process to allow for a true reckoning of costs – including short- and long-term mitigation. More specifically, construction in public right of way would limit freight mobility and marine terminal operations for up to five years.

For these reasons, we ask that the Board choose an alignment with the least overall impacts on our operations. Inherent in the EIS is the need to include all mitigation options and costs as well.

We are supportive of transit generally as it is a tool to reduce congestion and increase mobility for both freight and people. Our concern stems from the need to mitigate adverse impacts from light rail alignment and construction. We appreciate your attention to our concerns and are available to respond to specific questions or comments you may have.



If you have questions or comment, please contact me in our Seattle office at (206) 441-0182.

Thank you.

A handwritten signature in blue ink, appearing to be "JR", with a long horizontal flourish extending to the right.

Jordan Royer
VP for External Affairs

April 1, 2019

West Seattle and Ballard Link Extensions, c/o Lauren Swift

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

Dear Ms. Swift,

Pacific Terminals operates a warehouse and barge service located on the Duwamish across the street from Port of Seattle Terminal 5 just North of the West Seattle Bridge and Lower Spokane Street bridge.

Our business supports 25-35 maritime industrial jobs.

The total number of containers we handle at the Port of Seattle is very significant and ranges between 10,000 and 20,000 TEU's per year depending on economic fluctuations.

Pacific Terminals operates a barge service and at a time when there are considerable concerns about carbon footprint, our barge service has the LOWEST carbon footprint of any mode of transportation. Each barge carries the equivalent of 55-65 truck loads, which reduces the amount of trucks on the Washington highways. Because our barge service needs an accessible waterfront location, we cannot simply move to another location.

The transit services provided now and in the future by Sound Transit are critical to our ability to move goods more effectively and we want to work together with Sound Transit to make sure freight is considered in the planning of the West Seattle Link Extension.

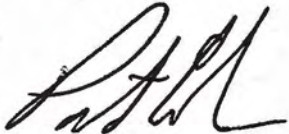
Our concern is the location of the crossing of the Duwamish. A crossing North of the Duwamish would have the following impacts to our business:

- Reduction in the flow of trucks to our facility- especially during the construction phase.
- Adversely impacts our neighbors (Terminal 7B) warehouse to handle our overflow cargos, as supports for the light rail will destroy portions of their warehouse. We rent up to 25,000 sq ft of their facility during peak times, and always maintain a footprint at their facility.
- Yard space is already at a premium in our area and will be further reduced by construction on the North side of the Duwamish.
- The combination of the T5 expansion project and the North Duwamish crossing would reduce the amount of access to our facility, due to street and rail crossing closures. The reduction in access would significantly affect the volume of trucks/containers/railcars/barges we could handle.
- Rail service to our facility is very important to our survival and could be negatively impacted during construction and operation of the North Duwamish crossing.
- Pacific Terminals provides service to a vast hinterland, including industries on the Olympic Peninsula, Vancouver Island, Oregon, and Eastern and Southwestern Washington.

We ask the Board to recognize the significant impact a North crossing would have on maritime industrial businesses in the region and include an in-depth assessment of those impacts in the scoping process to allow for an accurate evaluation of costs – including short term and long term mitigation.

We urge the Board to choose an alignment with a Southern Duwamish crossing as the preferred alternative for the EIS or at a minimum ensure that such an alignment is included in one of the options included in the environmental review.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pat Cohn', with a stylized, cursive script.

Pat Cohn

President Pacific Terminals

pcohn@pacificterminals.com

Cell: 206-612-1455

CC: Nicole Tucker, VP Pacific Terminals

Communication ID: 349298

From: Ray-Mont Logistics America

Scoping Comment:

Hello

I am the General Manager for Ray-Mont Logistics America and we handle freight on about 1000 containers per month. We have many customers that are located, or source their product from Eastern Washington. I support the Seattle Public Transit and agree that cars need to be taken off the road, but I also am very concerned that the project will have a negative impact on the freight mobility from Eastern Washington to the NWSA ports, specifically Harbour Island port locations. IF the construction were to go on for long periods of time our customers WILL find other gateway's to move their products and my fear is they will continue to operate in the manner after construction is finished. Ray-Mont supports the Port's and NWSA's request for inclusion of an option that would cross Harbor Island on the south tip of Harbor Island. I feel this would have less impact on the traffic moving in and around the port.

I urge Sound Transit to continue its analysis of these potential impacts in search of engineering or other solutions that will not reduce the availability of the truck community to access the ports.

Kind regards,

Teri Zimmerman-Reynolds

From: Mark Stiefel <mark@seattlelm.com>
Sent: Tuesday, April 2, 2019 4:58 PM
To: WSB Scoping Comments
Subject: West Seattle Light Rail - Scoping Comments

Sound Transit

To whom it may concern:

Duwamish Properties, LLC owns and leases property on Harbor Island, Terminal 23, to Harley Marine Services, Inc. Seattle Life Management, LLC manages property for Duwamish Properties.

Thank you for the opportunity to offer comment on the scope of review that will be conducted as part of the EIS process for the West Seattle - Ballard Link Light Rail Extension. Our site is critical to the maritime industry as Harley Marine Services, Inc. provides vital maritime transportation services, headquartered on Harbor Island along the Duwamish Waterway, just north of Spokane Street. At this location the company employs over 200 mariners and support personnel.

Impacts to container cargo and other maritime operations on the Duwamish Waterway have long-lasting economic and quality of life implications. Competition for this cargo remains fierce, and shippers see even the possibility of short- and long-term disruption as reason to utilize other gateways. These disruptions impact our tenant to both maintain and grow their business and to provide the family-wage jobs our region depends on.

The transit services provided now and in the future by Sound Transit are critical to our ability to move goods more efficiently – efficient freight movement depends on an efficient transportation system, and we want to partner with you as you move forward.

As you firm up your plans to extend light rail to West Seattle, please consider:

1. The impact of the project on employees entering their facilities on Harbor Island
2. The impact of the project on the maritime traffic along the Duwamish Waterway.

Thank you for your consideration and please let me know if I can be of any assistance.

Best Regards,

Mark Stiefel
President
Seattle Life Management, LLC
"A Helping Hand for Family Office, Seniors and Busy People"

206-979-8469
mark@seattlelm.com

Communication ID: 351535

From: Seattle Metropolitan Chamber of Commerce

Scoping Comment:

To Whom It May Concern:

Please accept these comments regarding the West Seattle and Ballard Link Extensions project and the topics that will be studied in the Environmental Impact Statement. The well-planned, efficient implementation of Sound Transit 3 projects is a priority for the Seattle Metropolitan Chamber of Commerce. Since the extension will have significant impacts on businesses—both during and after construction—we urge you to regularly engage with the local business community to promote the design of thoughtful, transit-oriented development. In pursuit of that effort, we urge you to engage the BIAs in impacted neighborhoods, specifically the SODO BIA, the Ballard Alliance, and the West Seattle Junction.

The Seattle Metropolitan Chamber of Commerce appreciates the opportunity to comment on the West Seattle and Ballard Link Extensions. We look forward to continuing to engage in this process.

Thank you,

Dominick Martin

Vice President of External Relations

<http://www.seattlechamber.com/>

dominickm@seattlechamber.com | d: 206-389-6396 | c: 206-920-0436

April 2, 2019

West Seattle and Ballard Link Extensions
c/o Lauren Swift, Sound Transit
401 S Jackson St.
Seattle, WA 98104

Dear Ms. Swift:

The SODO Business Improvement Area (BIA) was formed in 2013 to enhance the district's safety, cleanliness, mobility and to provide a voice for the more than 1200 businesses and 47,000 employees working in this area. SODO is a district in transition, with a new generation of manufacturing, logistics, commercial and retail businesses emerging. SODO businesses rely on effective and reliable surface street operations for all travel modes, including trucks and buses. The SODO BIA supports a light rail station with an alignment which delivers light rail service with the least impact on businesses, freight, and overall mobility within SODO.

Study Impact to freight and mobility of closing E3 Busway SODO is home to the Ryerson/Atlantic/Central Bases for King County Metro operations which deliver huge bus service both within Seattle and supporting the region. The current and continued use of the E-3 Busway for bus movements through SODO is a critical element of the overall mobility for freight and people in SODO. While the E-3 Busway appears to be an attractive public resource available to Sound Transit for trackway expansion, it is also the vital link for regional bus service delivery through SODO. Any compromise to that facility for bus service would relocate buses to the surface streets in SODO and compromise surface street operations for truck freight movements and overall mobility in SODO.

Use of the E-3 Busway for this light rail extension must be identified as an impact to the SODO district businesses and to King County Metro operations – for which mitigation must be identified and provided. Any alternative which would displace buses from the E-3 Busway would have significant impacts on SODO surface street operations and circulation for both trucks and buses – which are both critical to SODO business and neighborhood vitality. The environmental analysis must fully explore the alternatives to using the E3 Busway and fully reflect these potential impacts to freight movement and people movement via local buses.

Increase mobility within SODO SODO relies on effectively getting employees to and from work and accessibility to light rail is key for business growth in SODO. How will the project alternatives provide safe, effective and reliable access to light rail from all quadrants of SODO?

Link light rail must be accessible by all who work in SODO – accessible by foot, by bike, by transit connection and by other delivery means. Link stations must be accessible, safe and reliable throughout the service day – for all travelers. Station design needs to provide shelter for all time periods, and all weather conditions. Existing station amenities are minimal and insufficient for the anticipated demand. Future stations must provide for bicycle parking, local transit connections, pick up and drop off functions to ensure that all travel modes can access light rail at each station.

Pedestrian safety is paramount for access to and from the proposed light rail stations. This needs to be considered for the SODO and the Stadium stations – where high volumes of riders will access the station. A full analysis of access needs

will consider the full route from the light rail station to the stadium facilities and to 1st Ave South on the west and to Airport Way on the east, at a minimum, in order to identify and mitigate pedestrian impacts.

What facilities will be in place at SODO and Stadium stations for pick up and drop off activities? What facilities will accommodate local transit and circulation routing? How will this project provide for local bus layover? Layover and transit connections should not impact adjacent businesses or operation. This will need to be accommodated outside of the public right of way, in order to provide for loading and waiting activities.

Address “Hide and Ride” Parking Impacts This plan must study on-street parking impacts near the stations. Currently we see significant impact from link riders that use SODO surface parking to access the light rail for other destinations. Parking should remain available for accommodating local businesses’ patrons and employees who rely on the existing street and right of way parking and road access near the SODO and Stadium stations.

Study Impacts of North or South Duwamish Crossings on Existing SODO Businesses Light rail alignment impacts must be identified and mitigated for intersections and businesses in SODO affected by column placement. There are currently two choices for crossing the Duwamish and they appear to have significantly different impacts on SODO. A full study on the business displacement and traffic impacts from the two alignment tracks and the accessory bridges to access to the Operations and Maintenance Facility needs to be studied to understand the disparate impacts on SODO

Summary Implementation of Link to West Seattle and through SODO to Downtown and Ballard must consider impacts to SODO travel, circulation, businesses and employees – which includes both light rail alignment impacts to property plus alignment side effects such as the closing of the E3 Busway to buses – and the rerouting of buses to the surface streets. SODO relies on reliable and efficient truck circulation and any impacts on freight will impact businesses and community livelihood

Please ensure that these issues are fully addressed in the environmental review of the proposed light rail extension from West Seattle to Downtown through SODO, and from SODO through Downtown to Ballard. These issues of mobility in all travel modes are critical to SODO businesses and very important to the SODO BIA.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erin Goodman', with a stylized, cursive script.

Erin Goodman

Executive Director, SODO Business Improvement Area

April 2, 2019

VIA: Electronic Mail

Sound Transit
1100 2nd Avenue
Seattle, WA 98101
Email: wsbscopingcomments@soundtransit.org

RE: Sound Transit West Seattle Link Extension – Scoping Period

Dear Sound Transit Board, Stakeholder Advisory Group, and Elected Leadership Group Members:

We write on behalf of Two Junctions, LLC (“Two Junctions”), which owns the Oregonian apartments in the West Seattle Junction at 4315-4319 SW Oregon Street (“Oregonian”). Two Junctions appreciates the opportunity to comment on the West Seattle Link Extension and scoping process. As the owner of the Oregonian, which are located in the heart of Alaska Junction, Two Junctions is pleased that the core of West Seattle will be served by a broader range of transit options.

Two Junctions provides the following West Seattle Link Extension scoping comments. Overall, Two Junctions favors Alternative 3, as described in the February 2019 Alternatives Development Report, because a tunnel through Alaska Junction would best serve the neighborhood’s needs. The Report notes at page iii that an elevated track in West Seattle would cause “traffic, transportation infrastructure and freight impacts” if located along high-volume arterials, and significant “acquisitions and displacements” if located outside the right-of-way. The EIS must thoroughly study the: (1) acquisition, displacement, and relocation; (2) land use; (3) economic; (4) social impacts, community facilities and neighborhoods; (5) visual and aesthetics; (6) noise and vibration; (7) geology and soils; (8) environmental justice; and (9) transportation impacts of all alternatives, with special attention focused on the various elevated alternatives. Tunnel options would avoid the unsightly bulk and the barriers to mobility that are inherent in an elevated track, station, and supporting infrastructure. This must be thoroughly evaluated in the EIS. The presence of this infrastructure would also necessarily limit future development capacity in the urban village, hindering its ability to further density goals. Additionally, both the construction and future operations of an elevated system would bring increased noise and emissions to the neighborhood.

Although Two Junctions believes that a tunnel would best serve the neighborhood’s needs, it likewise urges Sound Transit to ensure the careful and comprehensive study of the effects of tunnel construction and operations on existing buildings and infrastructure. The Oregonian is located on the southwest side of the intersection of SW Oregon St and 44th Ave SW, which the 44th Ave tunnel option would pass directly under. Two Junctions would be pleased to see a station open nearby and serve the commercial core of the area but cautions that extensive study is needed regarding potential seismic hazards associated with tunnel boring, the effects of grading and clearing, and any other impacts that are likely to result. The EIS must evaluate for the effects of the tunnel on different types of construction – including older buildings like the Oregonian – and identify mitigation as appropriate.

Of the three underground route and Alaska Junction station options, Two Junctions supports the route on 44th Ave SW. Although the 44th Ave location would be closer to the edge of the urban village than the 41st or 42nd Ave alternatives, it would be easily accessible both to the residents of the rapidly densifying developments in the center of the Alaskan Junction and, crucially, to the residents of the less-dense neighborhoods to the west, incentivizing more of the latter group to choose transit over driving. Residents who are the same distance from the center of the urban village but on the eastern side, by contrast, could easily access the Avalon Station, which will be located only a few blocks away. Thus, the 44th Ave location would better distribute transit access throughout the neighborhood, encouraging both additional ridership and additional density.

Again, Two Junctions appreciates the opportunity to provide input on this project. We will look forward to Sound Transit's thorough evaluation of the West Seattle Link Alternatives in the EIS.

Sincerely,



Ian Morrison

Communication ID: 351302

From: Uwajimaya

Scoping Comment:

Dear Ms. Swift,

This letter is submitted on behalf of Uwajimaya, Inc, a family-owned business with decade-long roots in Seattle and specifically, the Chinatown International District. Our flagship store is located at 600 5th Ave S and The Publix, our mixed-use apartment and retail building, is located at 504 5th Ave S. We appreciate the opportunity to submit input on the scope of the environmental impact study for the West Seattle and Ballard Link Extensions.

Additionally, we have signed on and concur with the comments submitted on behalf of the Pioneer Square International District Community Preservation & Development Authority (dba Historic South Downtown). It is our intention to use this letter to call to attention specific comments of importance to Uwajimaya.

Uwajimaya feels it is very important to continue to study multiple alternatives in the EIS, including the 4th Ave alignment and the different construction methods. We believe the information present today is not complete nor comprehensive enough to responsibly narrow the alternatives and understand their potential impact to our neighborhood and community. We understand that a comprehensive study relies on the work and cooperation of other agencies, but that there is adequate time to do it "right."

The project, no matter the option chosen, will have significant impacts to the businesses in the area and not just those that are displaced, but also to those that will continue to operate throughout the construction. Recent projects, such as the 1st Ave street work and the street car construction have demonstrated that businesses will suffer even if there are access and sign mitigation. Visual barriers like construction fences, road and sidewalk closures and construction noise deters customers away from the businesses, continuing for years past when construction is complete. We would like to understand what type of mitigation will be provided to these businesses? Will there be mitigation plans presented and will adjustments be made during the process if the actual outcomes are different?

Lastly, we encourage Sound Transit to plan for the next hundred years and not compromise the long term benefits for short term victories. We have called Chinatown International District our home for over 70 years and want it to thrive and continue for the future generations to come.

Sincerely,

Denise Moriguchi

President & CEO

Uwajimaya, Inc

Ken Louie

VP of Real Estate

Uwajimaya, Inc

Miye Moriguchi

Development Manager

Uwajimaya, Inc

Communication ID: 349370

From: Washington State Potato Commission

Scoping Comment:

We support public transit as it provides safe, reliable transportation for Washingtonians. We do have concerns about the location of the light rail crossing of the Duwamish River, particularly north of the Spokane St Bridge on Harbor Island. This crossing has the potential to negatively impact access to Northwest Seaport Alliance (NWSA) facilities. We support the NWSA's request for inclusion of an option that would cross Harbor Island on the south tip of the Island. We need safe and efficient access for trucks from Eastern WA to the Port of Seattle. Roughly 70% of our 10-billion-pound harvested crop is exported as frozen french fries, dehydrated potatoes, or fresh potatoes to be consumed as snack food (potato chips) or table stock. Fluid transportation to the port is vital to our family farms. Construction projects like this can negatively impact the ability of farms and ag shippers to access the port and reach their key export markets. We urge Sound Transit to continue its analysis of these potential impacts in search of engineering or other solutions that avoid, eliminate or reduce them, including alternative routing that minimizes any impact to access by trucks.

The Washington State Potato Commission



Sound Transit Stakeholders Advisory Group

Sound Transit Elected Leaders Group

Sound Transit Board

The West Seattle Chamber of Commerce (WSCC) is committed to promoting sustainable economic growth of a diverse, viable business community. One of the biggest challenges to achieving this goal is our present transportation infrastructure. To support the future viability of the business community on the West Seattle peninsula, the WSCC has 3 main objectives by which any light rail proposal should be assessed:

1. Does the solution improve the quality of life for residents (i.e. customers and business owners) who live and work in and around the proposed alignments and station locations?
2. Does the solution improve the movement of people and commerce?
3. Does the solution minimize the disruption to economic activity during and after construction as well as provide suitable mitigation measures?

The WSCC continues to have grave concerns about the present alignments that appear to moving forward for further study in the upcoming Environmental Impact Statement (EIS) process. The WSCC would like to put forward the following concerns and comments from our business community here in West Seattle:

- Given the increased density in our West Seattle neighborhoods, we feel that it is essential that Sound Transit (ST) have an even deeper engagement with the residents and business owners that are going to be impacted by the proposed alignments. While we appreciate ST's engagement to-date, we strongly believe more is necessary. Everyone impacted by the various alignments needs to fully understand the unique potential impacts each alternative could have on each individual neighborhood's residents and businesses.
- In certain potentially impacted neighborhoods, ST must take into consideration the low-income population, diversity of cultures, potential for language barriers, and afford the same level of outreach that other areas have received prior to the Elected Leaders Group (ELG) making any Level 3 recommendations. This could include, but is not necessarily limited to:
 - o Bus-rail integration at the different station locations
 - o Providing the best service to communities that are further south of any of the proposed alignments or station locations
 - o Transit oriented development opportunities that are equitable
 - o Displacement and gentrification risks near the potential station locations of alignment choice whether the placement is north or south of the West Seattle bridge

The WSCC would offer these observations about alternate station terminations in the West Seattle Junction Hub Urban Village:

- The 44th Ave SW location would appear to be the most disruptive and least convenient
- The alternative location spanning SW Alaska St will disrupt traffic for many years during construction
- The 41st Ave SW location will be less disruptive to traffic and more convenient for feeder and distributor traffic modes especially navigating the grade from Fauntleroy Way to Alaska Street.
- The proposed stations on either 41st or 42nd Ave SW will have an adverse impact on many business locations and increased housing density that is developing in this area.
- The Avalon Station must be included to intercept the bus traffic from the south on 35th Ave SW, reduce transit traffic in the Alaska Junction Station site and therefore providing more reliable and safer service in the coming years.
- It would also be advisable to start the tunneling phase in this area at Avalon and continue into the Junction station.
 - o Consideration should also be given that any proposal of an elevated light rail system should not work against the planning for the Fauntleroy Blvd beautification project that has been worked on by the community for almost 20 years
 - o Consider that an elevated light rail line would go right over the “gateway” to West Seattle

Further, the WSCC would like to understand the specific construction impacts through each proposed route, especially around each of the proposed station locations as well as along the Duwamish crossing, and would like significantly more detail around the Alaska Junction terminus.

It is impossible to imagine an elevated alignment along the Spokane Street route that would not be debilitating during construction, and destructive to the quality of life of West Seattle residents and businesses when completed. The WSCC understands that mitigation would be required and wants to better understand what mitigation Sound Transit would be providing along this critical corridor if ST were to proceed with an elevated alignment. Given the extended construction period, the WSCC feels that it is important that ST considers further study of another route not along the Spokane corridor to provide the community and businesses with clear, distinct options.

The WSCC continues to support further study of segments of the “Purple Line” alignment with these observations:

- Span the Duwamish Waterway south of the West Seattle bridge to avoid interference of Port of Seattle activities that need access to Spokane St SW
- Consider alternatives to an elevated Delridge Station as it will have multiple negative impacts on the surrounding community, bus travel routes, nearby residences, sports activity spaces and cultural spaces.
- Provides immensely less impacts on the North Delridge community and North Delridge business node
- Impacts of traffic from the Port of Seattle/Northwest Seaport Alliance operations, operations at Nucor Steel and traffic egressing and ingressing the Pigeon Point neighborhood (including traffic to Pathfinder School).

The WSCC supports the tunnel alternatives. The cost of tunneling will be somewhat offset by two factors: 1) the continuing reduction of the cost of tunneling through advancement of tunneling technologies and 2) the cost savings from not having to purchase as much residential housing stock and commercial land as would be needed to complete an elevated line into and through the heart of West Seattle.

In conclusion the WSCC would urge the Stakeholder Advisory Group (SAG), the ELG, and the ST board to continue to move forward with the proposed expansion of light rail to the West Seattle peninsula as rapidly as possible. It is imperative that the proposed alternate "Purple Line" which as proposed would cross the Duwamish River at a more southern location be included as part of any upcoming EIS scope for these reasons:

- It would more easily allow two tunnel segments to be built more easily. One under the Pigeon Point neighborhood and the second from SW Avalon Way to the Alaska Junction.
- The tunnel options would increase the opportunity for more transit-oriented development
- Interconnecting of existing transit systems and those to come would be far easier to accomplish
- Will help to preserve the urban landscape in West Seattle by eliminating towering pillars that will reduce existing travel lanes.
- Will reduce oppressive shadows that will be cast by any elevated rail line.
- Reduce the potential noise pollution not only in the Delridge corridor but along any other stretch of elevated line through our West Seattle community.
- Minimize the potentially vast and impactful scope of taking by eminent domain of as much existing housing stock and commercial/business properties as appears to be envisioned by any of the elevated lines.
- Minimize the impact on our West Seattle businesses and traffic during the construction as seems to be envisioned by any of the elevated lines.

The WSCC and our entire West Seattle business community are committed to working with the SAG, ELG and ST Board. The WSCC would welcome further discussion of any of these alternatives as you move closer to a final decision on the scope of the upcoming EIS.

Sincerely,



Lauren Burgon, Board Chair



Julia Jordan, C.E.O.

From: Russell Shrewsbury <russ@westerntowboat.com>

Sent: Thursday, March 28, 2019 7:33 AM

To: WSB Scoping Comments

Cc: Charlie Costanzo

Subject: Ballard Link comments

On behalf of Western Towboat Co. we have a few concerns on the placement and types of bridges that are being considered for the project. As a company Western Towboat operates 22 tugboats of various size capacities in and around the PNW. Our shipyard and home port is in the ship canal 617 NW 40th Street Seattle, WA 98107 -located between Fremont and Ballard bridges on the north side of the waterway. We are involved daily in towing operations on the Ship canal using the Ballard bridge for opening constantly for tows of barges up to 300' feet and many fish-boats greater than 300' that call Lake Union home or call on the local Shipyards. To put a fixed bridge with a higher opening than Ballard bridge is not going to be conducive for safe navigation in our opinion. The challenges another bridge abutment will make to the waterway for safe navigation as well as the opening requirements we will need to transit 2 bridges while relying on the bridge operations to open upon our approach create significant safety concerns for us. We would ultimately like to see a tunnel option used by sound transit as it would not disrupt our operations and keep the waterway as it is now without further constraints to navigational safety. Our other question would be there is talk of replacing the Ballard bridge sooner than later due to its age, we think it would be beneficial to look at the opportunity for Sound Transit to work with the city and share the cost of a tunnel project for both the entities to help sold the traffic congestion caused by bridge openings if it was possible. As far as the the West Seattle bridge selection goes Western Towboat does not have any immediate concerns as long as the bridge remains in the same height as the upper Spokane street bridge and the bridge support structure does not impede the Duwamish River waterway any further.

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Russell Shrewsbury
VP / Western Towboat Co.
C: 206/571/3449

Communication ID: 350717

From: Young Corporation

Scoping Comment:

Young Corporation owns a steel foundry at 3444 13th Ave. SW on Harbor Island. We are a small manufacturing business based in Seattle for over 100 years.

WE STRONGLY OBJECT TO SOUND TRANSIT'S ROUTING ALTERNATIVE NORTH OF THE HI-LEVEL BRIDGE TO WEST SEATTLE. We prefer the routing alternative south of the existing bridge.

At risk if the north alternative is selected: 35 factory jobs at our foundry if we are forced to move. There is highly specialized equipment and power requirements, along with zoning, that make our location unique and impossible to replicate in any surrounding area, let alone in the city. Furthermore, even if the span does not impact our property, 2000 degree steel melted directly under Sound Transit's span makes no safety sense. Lastly, the economic impact of Sound Transit paying for a move of our facility and equipment, which will be required if we are condemned, will far outweigh any land value.

We strongly urge the alternative routing Sound Transit's new span to West Seattle south of the existing bridge.

Thank you,

Mark Lindberg

President

Young Corporation



APPENDIX F

Community Organization Comments

Subject: 350 Seattle Transportation Team Scoping Comment for Ballard Link station



April 1st, 2019

Please consider this scoping comment for the Ballard Link station, and include in scoping all light rail routes that could potentially be the most economical way to maximize ridership and Transit-Oriented development, and then choose the alternative that best optimizes for these two critical factors.

Scoping should take into consideration the effect of light rail decisions on climate. To that end, **light rail stations should be situated where they will attract the most riders, and where the most housing is and will be constructed, accelerating emission reductions.** Ridership and the opportunity for dense transit-oriented development should be top priority because:

- The most recent IPCC climate report makes it clear -- we have very little time to drastically reduce greenhouse gas emissions -- roughly a dozen years to reduce GHG emissions by 40-50% (<https://www.ipcc.ch/sr15/>)
- Personal transportation accounts for half of Seattle Greenhouse Gas (GHG) emissions (http://greenspace.seattle.gov/wp-content/uploads/2018/04/SeaClimateAction_April2018.pdf).
- Many if not most people cannot afford electric cars, and we can't achieve these emissions targets without getting most of us out of our cars and onto transit.
- Transit-Oriented Development (TOD) allows more people to live where they can have a low-carbon commute. It represents our best chance for accommodating Seattle's continued growth without sprawl that counteracts our other efforts toward GHG reduction.

We ask that you consider station locations that might prove more beneficial as climate impacts are taken into account, including the [possibility of a station at 20th Ave NW](#).

Thank you for considering these scoping comments,

Andrew Kidde and Alice Lockhart for 350 Seattle Transportation Team
206-501-6905 and 206-427-7884

Communication ID: 348480

From: 5th & Madison Condominiums

Scoping Comment:

The Board of Directors of the 5th and Madison Owners Association appreciate the opportunity to provide input on the West Seattle to Ballard light rail line project. Light rail is an important addition to our City and region, but the routing and station locations must be carefully considered because of the numerous impacts it has on our community and the human and natural environment.

The Board represents the owners of 124 units in the 5th and Madison Building (5M) located at 909 5th Avenue between Madison and Marion Streets. The residents of 5M share a seven-level underground parking garage with the adjacent 901 5th Avenue office building. There are 129 parking stalls on Levels B-D permanently assigned to our residents along with approximately 124 individual storage lockers located on Levels B-D. The parking structure sits beneath both buildings and spans the entire block-face on the west side of 5th Avenue between Madison and Marion Streets. It is the structural foundation for the two high rises and houses substantial utilities servicing both buildings.

Above the underground parking garage, between 5M and the 901 Office Building there is an elevated open plaza with landscaping, seating areas, trees and walkways---one of the few large open areas in the midtown downtown area.

We want to be very clear to ST planners that the plaza space should not be considered as a preferred alternative for access to the mid-town underground station. The Plaza sits on top of the seven-level parking garage. Any connection to the underground station would have to be placed through the heart of the parking structure likely eliminating most if not all the parking and storage spaces, and compromising building systems such as fire fighting components, plumbing, sanitation, and electrical located in the garage—causing substantial damage through significant loss of value and lifestyle disruption to our residents.

In addition to the significant decrease of property value through loss of onsite parking and storage there would be further detrimental impacts on 5M residents and owners; construction noise, increased traffic congestion on already busy 5th Ave, increase in panhandlers and transient population---all further reducing owners property value.

If the 5th Avenue alignment is carried forward into the EIS process, then the station should be shifted north to the area between Madison and Seneca or south to the area between Marion and Columbia. Any access points for the station, no matter where it is located, should be placed in the public right of way – not on any private properties and definitely not on the “Plaza Area” next to the 5th & Madison Building.

Preferred Route: The proposed routes through “midtown” Seattle run under either 5th Avenue or 6th Avenue. We strongly endorse the 6th Avenue route through the “midtown” section of the project.

6th Avenue presents fewer potential adverse impacts to residential properties and businesses while still achieving the goals of the project. The 6th Avenue alignment also allows more flexibility in the placement of station access points and would be a closer connection to the potential I-5 freeway park/lid being studied.

The 5th Avenue alignment currently proposes an underground station between Madison and Marion Streets. We understand that the station will be about 160 feet beneath the street and will have to be accessed by a large bank of elevators – similar to the light rail station on the top of Beacon Hill. As outlined above, our main objection to the 5th Avenue Route is the placement of the midtown station access point between Madison and Marion.

The location of such an elevator building should not be considered by ST in the plaza between 5th and Madison and the 901 Building.

EIS Study Topics: The EIS should carefully consider the direct and indirect transportation effects caused by station placement and access points, loss of parking and storage, potential for changes to the foundation support structure of the 5th and Madison building, disruption of 5th and Madison critical building systems, impact of 5th and Madison residents on a transient population shift to the midtown station area, and both resident and business displacements. The EIS should also be structured to allow the various segments of the preferred alternative and other alternatives to be “mixed” and “matched” in the final route selection. This provides greater design flexibility and does not dilute the discussion and assessment of the alternatives for each component part of the project to the detriment of the EIS’s primary purpose: to provide decision-makers with a fully-informed assessment of the environmental impacts of a proposed action.

Thank you for considering our comments.

Sincerely,

The Board of Directors

5th and Madison Owners Association

Pilar Bass: Vice President

Michael Kopp: President

Soo Park: Secretary

Karolyn Peterson: Treasurer

George Schuchart: Commercial Unit Owner



March 28, 2019

Via email (WSBscopingcomments@soundtransit.org)

WSBLE (c/o Lauren Swift, Central Corridor Environmental Manager)
Sound Transit
401 S. Jackson Street
Seattle, WA 98104-2826

Re: Scope of the EIS for the West Seattle and Ballard Link Extensions

Dear Ms. Swift:

This letter is submitted on behalf of the Alliance for Pioneer Square, and is meant to supplement the letter submitted on behalf of Historic South Downtown Community Preservation & Development Authority. The Alliance for Pioneer Square appreciates the opportunity to have input into the scope of this very important environmental document. The West Seattle and Ballard Link Extension (“West Seattle/Ballard Link”) has the potential to materially improve the mobility of Seattle residents from currently difficult to reach neighborhoods, to reduce the number of buses from those neighborhoods that must ply the streets of Downtown Seattle, and to make a material improvement in public transit for the region. But it also poses environmental risks. In the 1980s Seattle watched the construction of the Third Avenue bus tunnel destroy a healthy commercial neighborhood along Third Avenue, damaging the urban fabric of that formerly vital street for decades, if not permanently. The West Seattle/Ballard Link EIS is one of the few opportunities the public and Sound Transit will have to look comprehensively at the short- and long-term impacts of the West Seattle/Ballard Link, to consider alternatives that may reduce its adverse impacts and enhance its benefits, and to identify mitigation for adverse impacts that cannot be entirely prevented.

I. The Affected Environment of Pioneer Square

The Alliance for Pioneer Square is a nonprofit organization leading the revitalization of Pioneer Square Historic District through advocacy, programming, marketing, and community action. It works to help preserve what makes Pioneer Square the most authentic, engaging, and dynamic neighborhood in Seattle. By fostering pivotal new programs and facilitating crucial neighborhood action, it helps Pioneer Square move to a more vibrant and better place for everyone to live, work, and visit.

Pioneer Square is both a group of individually historic buildings and an historic district—one of the first such historic districts to be listed on the National Register of Historic Places. Both individual buildings and the district as a whole require constant reinvestment, and for that reinvestment to be

possible, the district must be a desirable place to live, work, and visit. Attracting both residents and office users to its upper floors requires that its street level be attractive: walkable, lined with shops and restaurants and full of dynamic life. If the shops and restaurants fail, the upper floors hollow out. In the years since 1970, when the Pioneer Square-Skid Road Historic District (“Pioneer Square Historic District”) was placed on the National Register, experience has taught that Pioneer Square is a delicate thing. Its fortunes have waxed and waned, as much based on City policies and actions as from economic cycles. For instance, the First Avenue South water main replacement, which took about six months longer than planned, kept visitors away from First Avenue South during the critical tourist season, and left retailers reeling during a period of otherwise robust commercial health for the City as a whole. When conditions become undesirable, it can take years to turn things back around. In the meantime, historic buildings can be lost to unsympathetic replacements, from which the district never recovers.

The last several years have witnessed a renaissance for Pioneer Square, as its attractive streetscape and thriving retail sector, combined with the regional transportation hub created by the close proximity of King Street and Union Stations, the Pioneer Square Link Light Rail station, the Washington State Ferry terminal and numerous Metro bus routes, have enticed millions of dollars of corporate investment from companies including Avalara, Saltchuk, and Weyerhaeuser Company, and numerous technology startups, among the region’s newest companies. That in turn has been accompanied by a burst of housing construction, with over 650 housing units being added within the Pioneer Square Historic District over the last decade. Maintaining the high quality of life that has attracted this corporate investment and new housing is a challenging task; Pioneer Square has demonstrated in the past that its fortunes can fall more easily than they can rise. It is, and will remain, the home of a disproportionate share of the region’s homeless population and other vulnerable people. Its historic buildings and streetscape can slide from charming to decrepit very easily if they are not maintained. Maintaining this vibrancy requires that the neighborhood not be subject to battering by public mega projects that reduce its accessibility, make its streetscape unattractive, or create noise, dust, congestion and disruption.

Pioneer Square is still in the midst of 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, and replacement of the water main under First Avenue South. Its ability to withstand those mega projects is in significant part a result of impact mitigation that those projects have provided. Undoubtedly similar mitigation will be required in order to withstand construction of West Seattle/Ballard Link.

II. Scope of the West Seattle/Ballard Link EIS.

With that foundation as to the affected environment that the West Seattle/Ballard Link will impact, the EIS must address the following issues.

A. Project Area Definition

It is a notable oversight that the Notice of Intent to Prepare an EIS published by the FTA on February 2, 2019 did not list the Pioneer Square neighborhood in the service area for the Light Rail Alternatives, while all current alternatives being evaluated fall within the Pioneer Square Historic District. Alliance for Pioneer Square was not included as an interested party in Sound Transit’s Stakeholder Advisory Process, and their voice is clearly missing from the body of work used to shape the alternatives to date. The EIS project area must include the entire Pioneer Square neighborhood

within the service area defined for the Project, and must evaluate the operational and construction impacts of the project on the neighborhood for all disciplines studied in the EIS.

B. Transportation Analysis

The EIS must address how the West Seattle/Ballard Link will change the number of buses that travel into and through downtown from routes now serving West Seattle and Burien (“South End Routes”), and how Sound Transit will coordinate with Metro to ensure that to the maximum extent possible, commuting patterns from the South End change from the current pattern of direct bus routes from South End communities to Downtown Seattle, to instead deliver commuters to the West Seattle Link station(s) for commuters to complete their trip on the West Seattle/Ballard Link. The entire point of the West Seattle/Ballard Link is to reduce the number of people who must travel by bus or car from South End neighborhoods to Downtown Seattle and back. But with only one or perhaps two stations in West Seattle, the ability to achieve that objective depends on close coordination between Metro, which operates most buses, and Sound Transit, so that Metro delivers riders from its South End Routes to the West Seattle station and they complete their trip on light rail. The EIS must provide careful analysis of transportation around the West Seattle station, and explain how Sound Transit will coordinate with Metro. Although Metro and Sound Transit are separate legal entities, the region is entitled to expect them to coordinate their service, and to work together to provide the analysis required by the EIS.

This issue is of concern to the Alliance for Pioneer Square because the demands of Metro buses coming to and from Downtown from the South End will prevent Pioneer Square from experiencing one of the most important benefits of the City’s Alaskan Way, Promenade and Overlook Walk Project (AWPOW) until the West Seattle Link is opened. One of the major objectives of AWPOW was to “reconnect” downtown Seattle to its waterfront, by creating a pedestrian friendly boulevard along Alaskan Way. As Seattle’s original downtown neighborhood, it is particularly appropriate that AWPOW reconnect Pioneer Square to the historic central waterfront along Elliott Bay. Pioneer Square property owners are slated to receive special assessments to help pay for AWPOW, and as a result are entitled to receive commensurate special benefits from that project. But because of Metro’s need to bring approximately 650 bus trips per day along SR 519/Alaskan Way, the design of the new Alaskan Way south of Columbia Street is required to include bus lanes in both directions. This results in Alaskan Way being between 7 and 8 lanes wide – which is a significant visual barrier to crossing from Pioneer Square to the waterfront, and is wider than is comfortable for many people, including the elderly, people with mobility limitations, and families with children in strollers, to cross. In addition, restrictions on Columbia Street to enhance bus flow to and from Downtown will restrict vehicular traffic on Columbia Street, damaging abutting properties and restricting access into and out of Pioneer Square. Those restrictions can be eased once the West Seattle Link is open, assuming that it results in a reduction in buses coming to and from Downtown from the South End Routes.

In a settlement agreement resolving the Alliance for Pioneer Square’s challenge to the adequacy of the AWPOW EIS, King County and the City of Seattle agreed in part:

1. When the extension of Sound Transit Light Rail to the West Seattle Alaska Junction Station (or, if final design changes the plan as presented to voters in 2016, to the nearest station to what was shown as the Alaska Junction Station in 2016) is completed and open to service, Metro will, subject to King County Code Section 28.94.020 as currently adopted or hereafter amended, reduce bus volumes on Alaskan Way south of Columbia Street and on Columbia Street, west of Third Avenue, to not more than 195 buses per day, or 30% of the currently estimated total of 650 trips per day. Upon

commencement of the Sound Transit Light Rail operations to West Seattle, the Parties and other stakeholders, including the Port of Seattle, will convene to evaluate the corridor's overall function along with the location of bus stops and signage, along the SR 519/Alaskan Way surface street and Columbia Street, and may make recommendations to the appropriate governing bodies or executives regarding opportunities for adjustments and improvements.

2. Within fifteen (15) months of the opening of the Alaska Junction Station of Sound Transit Light Rail service to West Seattle, the City will retrofit SR 519/Alaskan Way between Yesler Way and South King Street to narrow Alaskan Way by eliminating the transit lane on each side of Alaskan Way, and converting the area of the former transit lane to sidewalks, landscaping, and on-street parking identified in the FEIS or other uses (Alaskan Way Retrofit), subject to approval by WSDOT for the sections of the roadway that are within the SR 519 right-of-way, and taking into account the recommendations made under paragraph II.1. The Alaskan Way retrofit shall generally conform to the "Future 2030 5/6 Lane Configuration" shown on two sets of plans titled "Southend Alaskan Way 2030 Narrowing Concept," attached hereto as Exhibit A. The Alaskan Way Retrofit will be funded by the City and will require final budget authorization by the Seattle City Council for the Alaskan Way Retrofit at that time. The Alliance, the State, and the City will review the planned placement of street trees on the east and west side of Alaskan Way as part of AWPOW to ensure they do not conflict with this commitment. Beginning up to 5 years prior to the scheduled opening of Sound Transit Light Rail service to West Seattle, the City will work with WSDOT, the Port of Seattle, the Alliance, and Pioneer Square property owners and tenants on the design of the final configuration of Alaskan Way, generally consistent with the final configuration shown on Exhibit A.

3. Once the Alaskan Way Retrofit described in Section I.2 above is completed, and taking into account the recommendations from Section II.1, the City will allow general purpose traffic movement on Columbia Street in both directions, between Alaskan Way and Third Avenue, to facilitate local access and will maximize opportunities to restore parking, loading and building access that were reduced as part of changes directing Metro buses onto Columbia Street.

The EIS must recognize those commitments and explain how Sound Transit will work with the City to bring them to fruition.

C. Parking

Much as we all look forward to a day when abundant public transit eliminates the need for the personal automobile to get to and from Pioneer Square, that day is not yet here. Until it arrives, the economic viability of businesses in Pioneer Square depends on customers being able to reach them by personal vehicle, and the attractiveness of residential units depends on residents being able to have friends and family visit them by automobile. That requires that public parking be available for visitors arriving in Pioneer Square by automobile. The Alaskan Way Viaduct Replacement Project eliminated several thousand on street parking spots available to the Pioneer Square neighborhood. The Center City Connector streetcar project has eliminated more spaces. And the active development and redevelopment of properties within the Pioneer Square neighborhood has further depleted the supply

of available public parking. Thus, it is important that the EIS carefully analyze and fully mitigate any impact of the Project on future public parking supplies.

D. Construction Impacts

By far the most significant adverse impacts of the West Seattle/Ballard Link are likely to be construction impacts. Depending on the construction method chosen, those impacts could be extremely disruptive for several years. It is essential that the EIS carefully analyze the construction impacts on transportation, parking, business and residential access, emergency services, vibration, noise, and air quality. Although it is premature for Pioneer Square to comment on the specific construction impacts, if a Fourth Avenue alignment for the new tunnel is chosen it will be important to pay particular attention to the impact on the Union Station garage, and Union Station itself. Maintaining access for employees and vendors to all businesses at all times during construction will be critical, and the EIS should explain how that will be accomplished.

As a gateway neighborhood to and from Seattle in the South, Pioneer Square often takes the brunt of bus diversion and congestion from mega project impacts around the City. As this letter is being written, Pioneer Square is enduring bus re-routing along First Avenue to accommodate the myriad of traffic changes occurring in Seattle from the Alaskan Way Viaduct demolition, the Waterfront Seattle program, and the coming wave of buses erupting from the downtown bus tunnel to Seattle surface streets in March 2019. This increased bus traffic through the neighborhood is accelerating irreparable wear and tear on historic areaways along the corridor, and further eroding the pedestrian and public realm retail environment. The West Seattle/Ballard Link project construction may interrupt or divert buses from the E3 busway coming to and from downtown, and the EIS must study alternatives to avoid first, then minimize bus diversion through Pioneer Square during construction.

Although construction impacts cannot be avoided entirely with a mega project such as West Seattle/Ballard Link, those impacts can be mitigated, and it is essential that the EIS identify the construction mitigation that will be provided. Pioneer Square's recent experience with the highly disruptive Alaskan Way Viaduct and Elliott Bay Seawall Replacement Projects, the First Hill Streetcar construction, and the replacement of the First Avenue water main shows that with adequate mitigation, construction impacts may not be fatal to the vibrant street experience that is the foundation for Pioneer Square's success. Of critical importance was the funding of parking assistance, including reduced-cost short term parking in area garages and programs to inform visitors where parking is available, commitments (which must be kept) to cease construction during critical visitor periods, and funding of community information personnel, so that there is a direct line of communication between the project and the community and so that businesses and residents get as much warning of disruption as possible and know how to communicate back to the project management.

On the other hand, the City's experience with the construction of the Third Avenue transit tunnel in the 1980s is that it left a wake of business closures that attracted street crime and required decades to cure. Major public projects will have significant adverse impacts on the communities that must endure them, but the function of the EIS is to disclose those impacts, consider alternatives that will reduce the impacts, and identify what mitigation measures may limit the scope of the damage.

E. Public Realm, Land Use and Urban Design

The Alliance for Pioneer Square recently collaborated with Historic South Downtown Community Preservation & Development Authority and Seattle Chinatown International District Preservation and Development Authority in a robust community-based planning project to envision

the connectivity between the Pioneer Square and Chinatown-International District neighborhoods, where they come together at the intersection of S. Jackson Street between Third and Fifth Avenues. This planning project, called The Jackson Hub project, essentially defines the future vision of shared public realm spaces that connect Seattle's iconic transportation landmarks, Union Station and King Street Station and the two historic neighborhoods. These landmark transportation hubs fall within both the Pioneer Square Historic District, and the Chinatown-International Historic District, and all West Seattle/Ballard project alternatives will impact these historic resources and the surrounding environments. The Alliance for Pioneer Square requests that Sound Transit consider including design concepts and public realm improvements identified in the Jackson Hub project report in the designs and alternatives studied in the EIS. The EIS must also study the impacts of the alternatives on the neighborhood's ability to realize Jackson Hub project goals.

The Project plans provided to date do not provide any image of how the Project may affect the streets near the tunnel entrance, the streets the tunnel passes under, and the area of any stations. It is important, however, that those components be designed to be compatible with the historic neighborhoods through which they will pass. Pioneer Square and Chinatown-International District are both fine scaled, with small buildings, attractive, narrow streets, and human-scaled facades. That character is essential to maintaining the attractive street life and vibrant commercial businesses that create the quality of the neighborhood. Design of the Project in the Pioneer Square area must be consistent with that scale and character, and must maintain the fabric of the streetscape.

F. Social and Environmental Justice

Pioneer Square is among the King County neighborhoods with the highest density of environmental justice populations. According to the U.S. Census, over 40 percent of the Pioneer Square identifies as minority (2012-2016 American Community Survey). Nearly 30 percent of the population have incomes below the federal poverty level (2012-2016 American Community Survey). The highest concentration of homeless people in King County is in Pioneer Square, with over 44 percent of the population homeless (2010 U.S. Census).

Over the years, community and human services organizations have located in and near Pioneer Square to support our most vulnerable community members. Maintaining access to these and other public services, such as first responders and emergency medical care is essential.

The EIS must identify environmental justice populations living in Pioneer Square—including homeless populations, which are frequently missed or undercounted, and not typically accounted for in the surveys and resources transportation planning professionals use to perform analysis. Sound Transit should engage community and human service organizations to understand the scope, scale, and demographics of the homeless populations they serve for inclusion in the EIS. It must evaluate the potential impacts of the Project on environmental justice populations, including resources and institutions of particular importance to our neighborhood's minority, low-income, and homeless community members. Finally, the EIS will need to make a determination of whether project alternatives have a disproportionately high and adverse impact on environmental justice populations.

As described earlier in this letter, business and community leaders in Pioneer Square have worked hard to establish a vibrant neighborhood. Quality of life and community cohesion in our neighborhood is on the rise—our residents and businesses enjoy enticing and well-maintained public spaces and opportunities to gather and connect with one another at community events such as Art Walk. We know from past experience that maintaining this vibrancy requires vigilance, and once damaged, takes decades to repair. We expect the EIS to recognize the social resources and community

cohesion in Pioneer Square and analyze how the project alternatives would benefit and impact these resources and cohesion.

G. Historic Resources and Section 106 Compliance

As with all mega transportation projects utilizing federal funds within the Pioneer Square Historic District, Sound Transit will be required to comply with Section 106 of the National Historic Preservation Act. As stewards of the historic character and fabric of the neighborhood, The Alliance for Pioneer Square requests to be a consulting party to the Section 106 process for the West Seattle/Ballard Link Extension Project. To that end, we are requesting early coordination and participation in design development, to shape the design performance requirements that will ensure the historic character of the resources and the district are maintained.

Again, thank you for your consideration of these comments. Alliance for Pioneer Square looks forward to working with you in the development of this important public project.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Lisa Howard', with a stylized, flowing script.

Lisa Howard

**AGREEMENT REGARDING AWPOW BETWEEN THE ALLIANCE FOR
PIONEER SQUARE, THE CITY OF SEATTLE, WSDOT, AND KING COUNTY**

RECITALS

A. The City of Seattle ("City") is the proponent of a series of contiguous projects, known as the Alaskan Way, Promenade, and Overlook Walk ("AWPOW") which are a series of public improvements extending from south of S. King Street on the south to Battery Street on the north, generally along Seattle's waterfront and including Alaskan Way.

B. The City is the lead agency for AWPOW, and in that capacity has issued a Final Environmental Impact Statement ("FEIS") on AWPOW dated October 31, 2016.

C. The City intends to pay for AWPOW through several sources of funding, one of which is a local improvement district ("LID"), through which it expects to raise up to \$200 million from parties whose property receives "special benefit" from AWPOW.

D. Alliance for Pioneer Square ("Alliance") is a nonprofit organization leading the revitalization of Pioneer Square Historic District ("Pioneer Square"). It has filed an appeal of the adequacy of the FEIS to the City Hearing Examiner, contending that the FEIS is inadequate to meet the City's responsibilities under RCW ch. 43.21.C ("SEPA") on multiple grounds.

E. The Washington State Department of Transportation ("WSDOT") has intervened in the appeal of the FEIS to the Hearing Examiner. It is interested in AWPOW because Alaskan Way south of Colman Dock serves as State Route 519, provides access to the Seattle Ferry Terminal at Colman Dock, which is a WSDOT facility, and serves as one of two north-south freight routes through Seattle. In addition, WSDOT owns the property proposed as the location for the "Habitat Bench." WSDOT has also relied on the FEIS to sign Amendment No. 11 to GCB 1308, and has published a Notice of Action under SEPA of the signing of Amendment No. 11 to GCB 1308 ("Amendment 11"), relying on the FEIS for its compliance with SEPA in signing Amendment 11. Alliance has filed an action in King County Superior Court, Case No. 17-2-01514-8 SEA, challenging the validity of the State's action as described in the Notice of Action issued on December 21, 2016.

F. King County ("County") has intervened in the appeal of the FEIS to the Hearing Examiner. County has assumed the duties of the Metropolitan Municipal Corporation under RCW ch. 35.58, and operates bus transit service ("Metro") throughout King County. AWPOW includes the addition of two dedicated lanes for buses on Alaskan Way south of Columbia Street, on which Metro intends to run approximately 600 buses per day once the Alaskan Way Viaduct is removed. The combination of those transit lanes and turning lanes for vehicles waiting to

enter Colman Dock will result in Alaskan Way being between seven and eight lanes wide south of Yesler Way, adjacent to Pioneer Square.

G. City, WSDOT and County deny that the FEIS is inadequate. Without admitting any of the contentions of Alliance in its appeal to the Hearing Examiner, City, WSDOT and County are willing to take the following actions and make the following commitments, in consideration for Alliance dismissing its appeal of the adequacy of the FEIS before the Hearing Examiner and the suit challenging the validity of the State's actions described in WSDOT's Notice of Action and agreeing not to file any additional appeals related to AWPOW.

H. Sound Transit is currently in the process of designing and implementing a group of projects known as "ST 3." One component of ST 3 is extension of Link Light Rail to West Seattle. When the extension of Link Light Rail to the Alaska Junction Station in West Seattle is completed and open to service, Metro expects that its need to operate buses on Alaskan Way and Columbia Street west of Third Avenue will be significantly reduced.

I. The Port of Seattle, while not a party to this Agreement, is providing funding for the Alaskan Way Viaduct Replacement Program, which includes the improvements to Alaskan Way that are being constructed as part of AWPOW, pursuant to an agreement executed on August 27, 2013. Under this agreement, WSDOT has committed to ensuring that the Alaskan Way Viaduct Replacement Program will be designed and constructed to facilitate efficient movement of freight and other traffic on the west corridors of the Seattle transportation system between the Duwamish Waterway and the Ballard-Interbay neighborhoods.

J. The Alliance, the City, WSDOT and County (the Parties) are entering into this Agreement to fully resolve any dispute over the adequacy of the AWPOW FEIS.

AGREEMENT

I. Construction Mitigation and Immediate Changes to AWPOW

1. The City and the State agree to allow public access to the "Habitat Bench" as generally depicted in Figure 2-3 of the FEIS in accordance with a construction easement and future lease agreement between the City and State. Access will be available to members of the public during operating hours established by the Seattle Department of Parks and Recreation, through a gate that will be built as part of the Habitat Bench immediately north of the Washington Street Boat Landing depicted on Figure 2-3 of the FEIS. The City will be responsible for maintaining public access to the Habitat Bench. The City and the State will negotiate the timing and responsibility for construction of the Habitat Bench, but agree to make it accessible to the public by the end of 2022. "Operating hours" for the Habitat Bench will generally be the same as for other city parks for which the Seattle Department of Parks and Recreation establishes operating hours and hours

of closure, but not less than sunrise to sunset. The City and State, in collaboration with the Alliance, agree to work together to establish an operating plan for the Habitat Bench, which must meet the Seattle Ferry Terminal's public safety and security requirements, and that will address operating hours and other considerations.

The City, State, and Alliance further agree that public access to the Habitat Bench will not cause the Habitat Bench to be treated as a public recreational facility for the purposes of section 4(f) of the Transportation Act, 23 U.S.C. §138, and that the Habitat Bench will be developed as a joint development, as set out in 23 C.F.R. §774.11(i).

2. The City will increase funding for east/west connections in Pioneer Square from approximately \$12M to a total of \$20M. The Parties recognize that the future source of this additional funding will be the proposed Waterfront LID, which will be subject to more review and input from stakeholders in Pioneer Square and elsewhere in Center City and will require approval of the Seattle City Council. The additional funding will be used to implement pedestrian improvements, of like kind to those planned for S. Washington Street and S. Main Street and described in Section 2.3.4 of the FEIS, to Yesler Way, S. Main Street, S. Washington Street and S. King Street, and will extend from Alaskan Way to Second Avenue, to the extent feasible. The City and Alliance, with input from the neighborhood stakeholders, will collaboratively analyze on a block by block basis how to best leverage city dollars with planned private investment so as to maximize the benefit of those street improvements to Pioneer Square as a whole. The City and Alliance acknowledge that historic preservation requirements related to the preservation/reconstruction of areaways could significantly add to the cost of these improvements and will work together to address that issue.

3. Beginning 6 months prior to the anticipated start of waterfront construction until the end of significant construction of AWPOW, City will pay to Alliance \$75,000 annually, pro-rated as appropriate, to allow Alliance to fulfill construction coordination and communication functions in collaboration with public partners. The Alliance will provide status reports at reasonable intervals and containing relevant information, as agreed to by the Alliance and the City and memorialized in a memorandum of agreement. This support is intended to ensure an effective interface between the City, WSDOT and County, on the one hand, and property owners and tenants within Pioneer Square, on the other hand, to help ensure that construction of AWPOW does not render properties within Pioneer Square inaccessible or uninhabitable for their usual purposes, and to minimize the construction impacts on owners and tenants and their customers within Pioneer Square. For purposes of this Section I.3 and Section I.4, below, the "end of significant construction" shall be the date on which all construction of Alaskan Way and the east/west connections improvements described in Section I.2 above has been completed (other than improvements which based on the process in Section I.2 the Parties decide will be implemented by adjacent private properties), and all restrictions on any streets within Pioneer Square due to construction of AWPOW have been eliminated.

4. From the start of waterfront construction until the end of significant construction of AWPOW, the City and State will fund the extension of existing low-rate parking agreements with off-street parking operators at the First and Columbia and Butler Garages that acquire the right for short-term parkers to park off-street at the City's on-street parking rate. The City, State, and Alliance recognize that meeting this commitment is contingent on reaching reasonable terms with these parking operators generally consistent with existing low-rate parking agreements. For purposes of this provision, "short term" parking is parking for 4 hours or less.

5. Until ST 3 reaches the Alaska Junction Station (or if final design changes the plan as presented to voters in 2016, to the nearest station to what was shown as the Alaska Junction Station in 2016), Metro estimates that it will operate not more than 650 buses per day on Alaskan Way south of Columbia Street, provided, however, that when the City of Seattle has completed the Lander Street Overpass, the Parties and other stakeholders, including the Port of Seattle, will convene to review travel time and reliability data since the opening of the SR 519/Alaskan Way surface street as part of AWPOW. This data will be used to look for possible opportunities for route adjustments and improvements and the Parties may make recommendations to the County Executive, Mayor, and City Council. Any route adjustment or improvements will be subject to King County Code Section 28.94.020 as currently adopted or hereafter amended.

II. Final Conditions

1. When the extension of Sound Transit Light Rail to the West Seattle Alaska Junction Station (or, if final design changes the plan as presented to voters in 2016, to the nearest station to what was shown as the Alaska Junction Station in 2016) is completed and open to service, Metro will, subject to King County Code Section 28.94.020 as currently adopted or hereafter amended, reduce bus volumes on Alaskan Way south of Columbia Street and on Columbia Street, west of Third Avenue, to not more than 195 buses per day, or 30% of the currently estimated total of 650 trips per day. Upon commencement of the Sound Transit Light Rail operations to West Seattle, the Parties and other stakeholders, including the Port of Seattle, will convene to evaluate the corridor's overall function along with the location of bus stops and signage, along the SR 519/Alaskan Way surface street and Columbia Street, and may make recommendations to the appropriate governing bodies or executives regarding opportunities for adjustments and improvements.

2. Within fifteen (15) months of the opening of the Alaska Junction Station of Sound Transit Light Rail service to West Seattle, the City will retrofit SR 519/Alaskan Way between Yesler Way and South King Street to narrow Alaskan Way by eliminating the transit lane on each side of Alaskan Way, and converting the area of the former transit lane to sidewalks, landscaping, and on-street parking identified in the FEIS or other uses (Alaskan Way Retrofit), subject to approval by WSDOT for the sections of the roadway that are within the SR 519 right-of-way, and taking into account the recommendations made under paragraph II.1. The Alaskan Way retrofit shall generally conform to the "Future 2030 5/6 Lane Configuration" shown on two

sets of plans titled “Southend Alaskan Way 2030 Narrowing Concept,” attached hereto as Exhibit A. The Alaskan Way Retrofit will be funded by the City and will require final budget authorization by the Seattle City Council for the Alaskan Way Retrofit at that time. The Alliance, the State, and the City will review the planned placement of street trees on the east and west side of Alaskan Way as part of AWPOW to ensure they do not conflict with this commitment. Beginning up to 5 years prior to the scheduled opening of Sound Transit Light Rail service to West Seattle, the City will work with WSDOT, the Port of Seattle, the Alliance, and Pioneer Square property owners and tenants on the design of the final configuration of Alaskan Way, generally consistent with the final configuration shown on Exhibit A.

3. Once the Alaskan Way Retrofit described in Section I.2 above is completed, and taking into account the recommendations from Section II.1, the City will allow general purpose traffic movement on Columbia Street in both directions, between Alaskan Way and Third Avenue, to facilitate local access and will maximize opportunities to restore parking, loading and building access that were reduced as part of changes directing Metro buses onto Columbia Street.

III. Effective Date and Dismissal of Appeals of FEIS

1. This “Agreement Regarding AWPOW” (“Agreement”) will be ratified by ordinances passed by the Seattle City Council and signed by the Mayor of Seattle, and by the King County Council and signed by the King County Executive. The form of the ordinances will be approved by the Seattle City Attorney, the King County Prosecuting Attorney’s Office and counsel for Alliance prior to their adoption. The Effective Date of this Agreement will be the date when the last of the actions required by this Section III.1 has occurred.

2. From the date this Agreement is signed by all Parties until the Effective Date, all proceedings before the Seattle Hearing Examiner or in Superior Court will be stayed. Within two business days following the Effective Date of the Agreement, Alliance will move to dismiss its appeal to the City Hearing Examiner of the adequacy of the FEIS, and will move to dismiss King County Cause No. 17-2-01514-8 SEA.

IV. SEPA Compliance

1. Alliance stipulates and agrees that so long as the LID, if formed, includes the funding and improvements generally described in Section I.2, above, the Alliance will support having costs associated with implementing those provisions included in the LID, and work with other Center City stakeholders to advocate for their inclusion in the LID.

2. Alliance stipulates and agrees that the changes in AWPOW called for by this Agreement, including the additional investments in east/west connections called for in Section I.2 above, will

have no significant adverse impact on the environment and that it will take no steps to challenge any amendment to AWPOW that is consistent with this Agreement based on SEPA.

V. Miscellaneous Provisions

1. This Agreement may be signed in counterparts.
2. This Agreement may be amended by the Parties so long as all Parties agree to the amendment in writing.
3. Nothing in this agreement supersedes WSDOT's responsibilities under state law, including Title 47 RCW. If any portion of this Agreement is found to be invalid or unenforceable, the remainder shall be valid and enforceable so long as the overall purpose of the Agreement can be achieved.
4. The Parties agree that they will comply with their obligations under this Agreement. Should any party fail to comply with their obligations, the others will have no adequate remedy in damages and will be entitled to an injunction enforcing this Agreement.
5. Alliance agrees that it will not file any local, state, or federal administrative appeal, state or federal judicial appeal, or any appeal or lawsuit of any other kind challenging any governmental permit or approval related to AWPOW, unless there is substantial modification to AWPOW as it is currently proposed and described herein. The parties agree to negotiate in good faith to amend the terms of this Agreement, as needed, to address any issues related to any substantial modification. Any opposition, shall be limited to the impacts associated with any substantial modification. For purposes of this paragraph, "substantial modification" does not include modifications reasonably required or necessary to implement the purposes of this Agreement. Notwithstanding the foregoing, Alliance shall be entitled to take any administrative or legal action it deems appropriate or necessary to enforce the terms of this Agreement.

Agreed:

ALLIANCE FOR PIONEER SQUARE


By Leslie G. Smith
Its Executive Director

EXHIBIT A:

SOUTHEAST ALASKAN WAY:
2030 NARROWING CONCEPT

FEB 2017

KING ST. to MAIN ST.

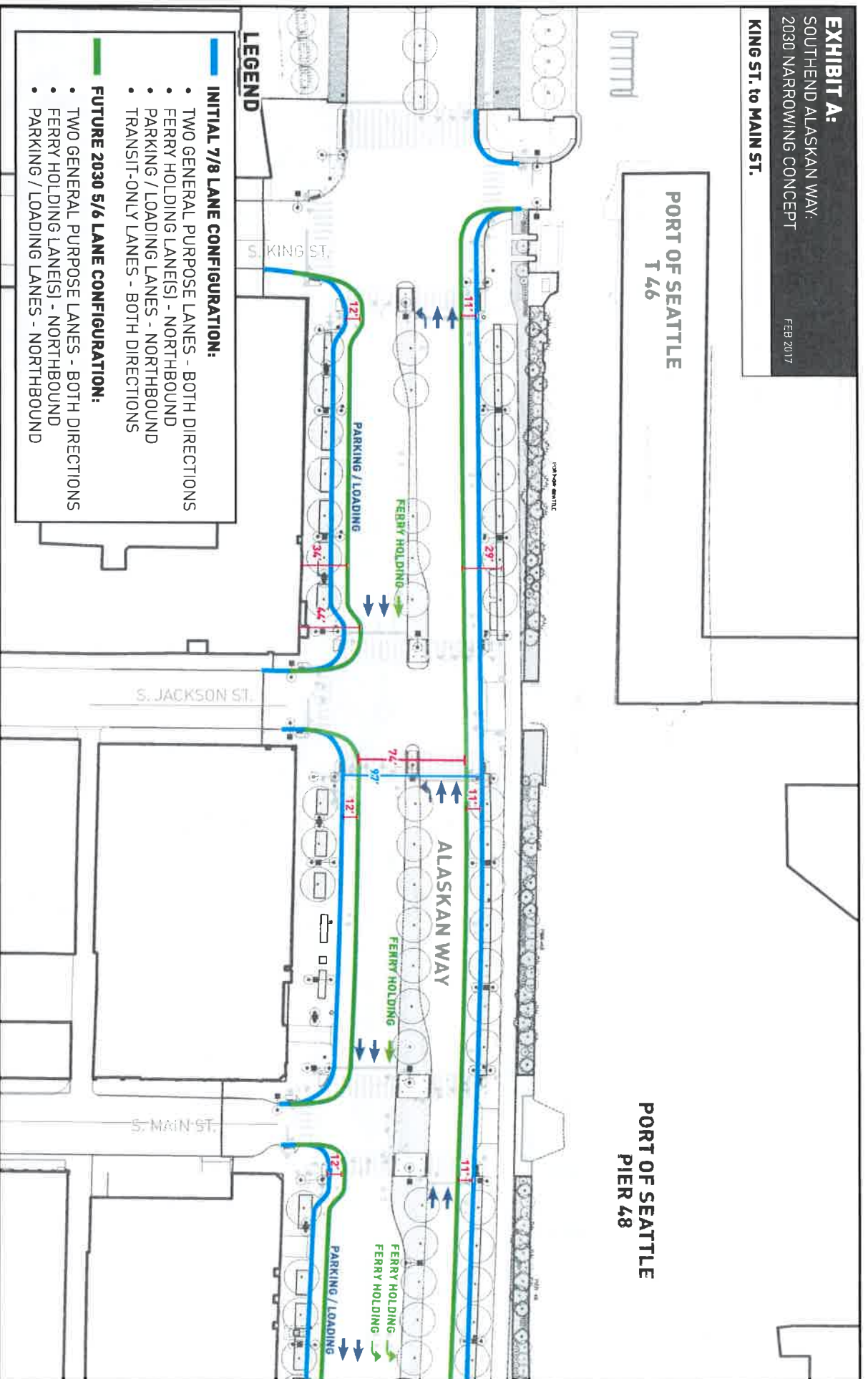


EXHIBIT A:

SOUTHEAST ALASKAN WAY:
2030 NARROWING CONCEPT

FEB 2017

S. WASHINGTON ST. to COLUMBIA ST.

PORT OF SEATTLE
PIER 48

COLMAN DOCK
PIER 52

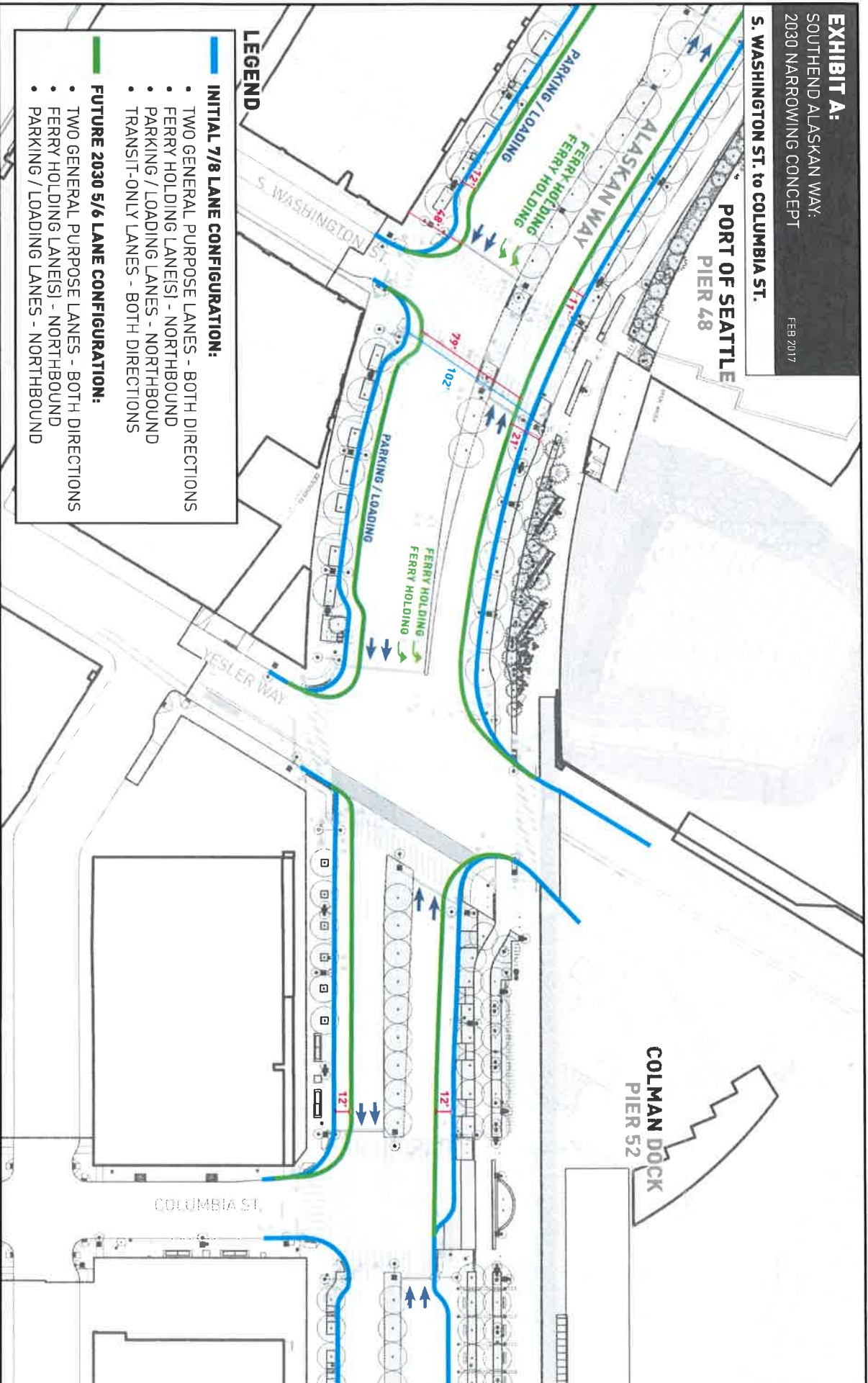
LEGEND

INITIAL 7/8 LANE CONFIGURATION:

- TWO GENERAL PURPOSE LANES - BOTH DIRECTIONS
- FERRY HOLDING LANE(S) - NORTHBOUND
- PARKING / LOADING LANES - NORTHBOUND
- TRANSIT-ONLY LANES - BOTH DIRECTIONS

FUTURE 2030 5/6 LANE CONFIGURATION:

- TWO GENERAL PURPOSE LANES - BOTH DIRECTIONS
- FERRY HOLDING LANE(S) - NORTHBOUND
- PARKING / LOADING LANES - NORTHBOUND





April 1, 2019
Sound Transit
wsbscopingcomments@soundtransit.org
1100 2nd Avenue
Seattle, WA 98101

VIA: Electronic

RE: Sound Transit Ballard Link Extension – Scoping Period

Dear Sound Transit Board, Stakeholder Advisory Group, and Elected Leadership Group Members:

The Ballard Alliance appreciates the opportunity to provide input as Sound Transit and the Federal Transit Administration conduct scoping for the Ballard Link Extension (the “Project”).

The Ballard Alliance is a business and community development organization that works to ensure the Ballard neighborhood remains a unique and economically vital community for its visitors, residents, businesses and property owners. The organization provides programs and services critical to ensuring that Ballard is a vibrant place to live, shop, work, eat and play. More specifically, the Ballard Alliance focuses on four key programmatic areas: (1) urban design and transportation; (2) economic development and business retention; (3) marketing and promotions; and (4) ensuring that Ballard is a clean, healthy and safe neighborhood.

The Project will connect one of Seattle’s major neighborhoods with the surrounding region. The Ballard neighborhood contains thousands of residents, scores of independent businesses and a unique character. The neighborhood also contains a strong economy with a dynamic manufacturing and industrial district including maritime businesses, local craft makers, and a growing brewery community. The Ballard Alliance fully supports facilitating improved public transit to Ballard. We especially encourage the Project to connect to the heart of Ballard, which we think of as 22nd Avenue NW & NW Market Street. As the Project is a massive 100-year investment for the future, all aspects, including the existing economy, residents, and businesses, should be considered during the Project development.

We understand that Sound Transit has invited comments on the draft Purpose and Need statement, the route and station alternatives, and topics to study in the Environmental Impact Statement.

Purpose and Need

The current draft Purpose and Need statement, as included in the February 15, 2019 Scoping Information Report, is phrased almost entirely in terms of general goals, such as “improve regional mobility,” and general needs, such as Washington’s policy of reducing greenhouse gas emissions.

The Ballard Alliance supports these goals and appreciates the recognition that existing transit between downtown and Ballard operates with poor reliability. However, although it is an important component of a larger effort that will serve these broad goals, the Project's effects will be felt most strongly in the neighborhoods it serves. Its purposes and needs must therefore be put into localized context with the existing plans and programs. Due to the proximity of the Project to the Ballard Urban Center, and the Ballard Interbay Northend Manufacturing and Industrial Center (BINMIC), the Ballard Alliance offers the following addition to the Purpose and Need Section:

- Purpose: Enhance the Ballard Urban Center and BINMIC by preserving and promoting the unique characteristics of Ballard – especially with the vibrant urban and historic core of Ballard – and protecting the industrial economy that is vital to our region.
- Need: Increase reliable and efficient access to the Ballard Urban Center by enhancing multimodal transit in and out of Ballard.

Route and Station Alternatives

The Ballard Alliance strongly believes that the Project should cross Salmon Bay through a tunnel, rather than over a bridge. A tunnel will deliver more reliable, rapid service at comparable cost, with less impact on both the existing aquatic habitat and surrounding communities. Accordingly, the Ballard Alliance respectfully requests that the Sound Transit Board adopt a preferred alternative that utilizes a tunnel beneath the ship canal with a station located at or West of 15th Avenue NW.

The advantages of a tunnel are readily apparent from the analysis in the February 15, 2019 Alternatives Development Report. The Report recognizes that a movable bridge “degrades systemwide reliability” due to exposure and a greater number of moving parts. Report, p. 21. In addition, a movable bridge would also have the “most potential in-water effects” on salmon and other aquatic habitats, as well as “temporary and permanent impacts to Fishermen’s Terminal and other freshwater maritime businesses that would be hard to relocate,” due to construction and to the presence of physical supporting structures that would restrict mobility and necessitate displacement. *Id.* A fixed bridge would improve reliability but would still impact maritime businesses and require consideration of “coordination with maritime properties, vessel traffic, fish windows, and tribal treaty fishing.” *Id.*, p. 24. The physical impacts of bridge and elevated station infrastructure would also affect residents and businesses and increase congestion farther from the water. By contrast, a tunnel would “support systemwide service reliability,” “avoids potential permanent in-water effects,” and avoids “impacts to Fishermen’s Terminal and other freshwater maritime businesses in Salmon Bay.” *Id.*, p. 29. The capital cost of a tunnel is higher; however, this one-time expense fails to account for the future financial benefits of increased reliability, reduced congestion and displacement, and minimized environmental impacts.

As one of the Project goals should be to connect with the heart of Ballard, we believe that the baseline for this is the 15th Avenue NW alignment, which serves the needs of the Project and the neighborhood. The Ballard Alliance requests that the following considerations guide the selection of station location and other choices:

1. The length of time of construction, particularly as it impacts traffic and congestion;

2. Current and potential future mobility and access for both industrial and commercial purposes along the entire 15th Avenue West corridor;
3. Minimizing conflict with local businesses and infrastructure;
4. The unique transportation needs of the BINMIC, including land- and water-based shipping;
5. Potential future lines of service that may connect east to the University of Washington, as well as north;
6. Station location should be sited to serve the highest current and future population density;
7. Opportunities to support local businesses and historic districts;
8. Aesthetic and urban placemaking opportunities to strengthen established communities;
9. Ensuring station access for all stations on all four corners of any tunneled station; and
10. Any bridge alternative should account fully for environmental impacts and reliability issues (including from required bridge openings) so as to reflect the true cost compared with a tunnel.


Additionally, we strongly support the consideration of a transit station located on 20th Ave NW, north of Market St. This best aligns with existing density in the neighborhood and prevents future conflicts between transit and freight mobility along 15th Ave NW. We strongly encourage Sound Transit to study this alternative during this once-in-a-generation alignment process.

Elements of an Environmental Impact Statement

The Ballard Alliance asks that Sound Transit complete a full review of all the elements and issues related to the environment as is required under the State Environmental Policy Act ("SEPA"), RCW 43.21C. The full scope of elements that the Ballard Alliance would like to have addressed in an environmental impact statement is listed in Attachment A.

In conclusion, the Ballard Alliance respectfully requests that due consideration be given to the existing businesses and residents that make Ballard the vibrant neighborhood it is today. This is a 100-year plus decision; it should strengthen and serve the vibrant Ballard core. Ideally, a station option would serve the heart of Ballard closer to 22nd & Market; however, given the early process to date, we think the best option is to locate an underground station at or West of 15th Avenue West. In addition to the major impacts that a bridge would have on the habitat in Salmon Bay and the distinctive industrial activities in the BINMIC, the economic and cultural value of the neighborhood as a whole should be a key consideration in evaluating Project alternatives.

Sincerely,



Mike Stewart, Executive Director
Ballard Alliance
5306 Ballard Avenue, Suite 216
Seattle, WA 98107



Tom Malone, Co-Chair
Ballard Alliance Ratepayer Advisory Board

Attachment A

Elements of an Environmental Impact Statement

Transportation

1. Plans and Policies
 - a) Evaluate relevant plans and policies from Seattle's Comprehensive Plan relevant to the BINMIC and industrial land uses across alternatives.
 - b) Evaluate relevant plans and policies from Seattle's Transportation plan relevant to the BINMIC and industrial land uses.
 - c) Present and summarize Seattle's Freight Master Plan, present freight corridors and truck streets.
 - d) Identify spot and corridor freight improvements in the Freight Master Plan within the project area, in particular on 15th Avenue NW. Ensure that these projects can be completed with the project alternative.
2. Arterials and Local Streets
 - a) All changes in geometrics or channelization and redistribution of traffic and truck volumes that occur with the project alternatives should include an analysis of impacts to truck mobility (circulation, geometrics, capacity, traffic volume by time of day, and increase in travel time for truck movements).
3. Freight Mobility and Access
 - a) Document truck street classifications; 15th Avenue W is a major truck street, a seaport highway connector, and on the heavy haul network.
 - b) Document truck volumes on streets within the study area.
 - c) Provide truck volume data by time of day for all approaches to study intersections and all intersections that could be affected by the project alternative.
 - d) Prepare level of service analysis for the peak hour of truck volume for all intersections with classified truck streets.
 - e) Ensure that intersection level of service analysis accounts for future bus volumes, bus priority signalization and pedestrian volumes.
 - f) For arterials with an increase in traffic volume, provide an estimate of the increase in truck travel delay during the AM and PM peak hours, and the peak hour of truck traffic.
 - g) Evaluate and compare for each alternative the hours of the day with LOS F congestion on the facilities that cross Salmon Bay and include estimates of delay with bridge openings.
 - h) Identify all changes to truck access at driveways and including any turn restrictions that alter access to industrial areas.
 - i) Show street and arterial design for elevated and at-grade segments. Ensure that modifications to 15th Avenue NW integrate improvements in the Freight Master Plan.
4. Safety
 - a) Identify intersection and driveway conflict points at locations used by trucks and non-motorized vehicles.
 - b) Evaluate sight distance at locations identified above.
 - c) Collect truck volume data by time of day at locations identified above and forecast truck volumes. Estimate nonmotorized volume at locations identified above.
 - d) Identify any increase in risk to safety as in conflict with Seattle's Vision Zero plan.
5. Construction Impacts

- a) Given the length of time of construction; and the economic sensitivity of industrial lands to traffic, congestion, and mobility; prepare the above analysis for impacts during construction.
6. Indirect and Cumulative Impacts
 - a) Include freight travel and truck mobility in the analysis of indirect and cumulative impacts.
7. Mitigation
 - a) Identify mitigation for identified decrease in truck mobility.
 - b) Evaluate potential impacts of mitigation measures to truck mobility.

Acquisitions, Displacements, and Relocations

1. Analysis should include the interdependency of industrial businesses and the dependency of industrial businesses on a working waterfront. The loss of one business may create a subsequent loss of interdependent businesses.
2. Analysis should include the potential for economic impacts on industrial lands to induce acquisitions, displacements, and relocations.

Land Use

1. Clearly present the geographic area of the BINMIC.
2. Clearly present the interdependent industrial land uses between the BINMIC and all other industrial areas in Seattle and regionally.
3. Clearly present the interdependent industrial land uses, their dependency on the Seattle's freight corridors and a working waterfront.
4. Clearly present the freight network, truck volumes, and explain how freight movement on the freight network relates to the industrial land uses.
5. Identify how any impacts to truck mobility caused by the project impacts the BINMIC industrial land uses.
6. Present City of Seattle Comprehensive Plan policies relevant to the BINMIC and industrial land uses. For example, LU 10.16 that states, "Prohibit uses that attract large numbers of people to the industrial area for nonindustrial purposes, in order to keep the focus on industrial activity and to minimize potential conflicts from the noise, nighttime activity, and truck movement that accompanies industrial activity."
7. Evaluate the potential for station locations to open up the industrial areas to non-industrial uses which we oppose.
8. Evaluate and present the City of Seattle neighborhood plan and policies for the Ballard/Interbay Northend Manufacturing & Industrial Center (BINMIC). The policies are quite thorough and provide clear policy direction to provide truck and freight mobility through and within the BINMIC.

Economics

1. Provide relevant economic data for the BINMIC including the quantity of industrial lands, types of industry, number of jobs and level of pay, and contribution to the regional economy.
2. Evaluate economic impacts on industrial lands due to; acquisitions, displacements, and relocations, and whether or not these impacts can be mitigated.

3. Evaluate economic impacts of decreased truck mobility and additional travel time impacts locally and regionally.

Social Impacts, Community Facilities, and Neighborhoods

1. Present and evaluate City of Seattle Comprehensive Plan policies relevant to protecting industrial jobs.
2. Evaluate the impacts of job loss due to economic and land use impact to industrial lands.
3. Evaluate the importance of the industrial community to the Ballard neighborhood.
4. Evaluate the opportunities for urban design statements and placemaking that supports the existing Ballard community, especially west of 15th Avenue and in the historic districts.

Air Quality

1. Evaluate changes in local truck movement due to project alternatives and the potential increase truck travel and idle time on the street network and at intersections.
2. Evaluate increase in truck travel time for regional movements due to reduction in capacity along alternative routes and include this analysis in air quality analysis.
3. Evaluate impacts described above for the peak of truck travel.

Energy Impacts

1. Include the factors described above for Air Quality to identify the increased energy consumption of increased truck travel, truck delay, and truck idling.

Hazardous Materials

1. Identify the existing movement of hazardous materials from industrial land uses.
2. Identify the effect of mobility impacts, locally and regionally, on the movement of hazardous materials.
3. Identify alternative movement of hazardous materials due to any restrictions to hazardous materials resulting from the project; including local constraints and reduction in capacity within alternative corridors.
4. Identify reasonable mitigation of any Acquisitions, Displacements, and Relocations of industrial land uses with movement of hazardous materials.

Environmental Justice

1. Evaluate environmental and social justice impacts to industrial jobs.

April 1, 2019

Via E-mail and U.S. Mail

Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104
wsbscopingcomments@soundtransit.org

Re: Public Comment
ST3: West Seattle - Ballard Link Extensions
Delridge Station Area

Dear Ms. Swift:

We represent The Charles & Emma Frye Free Public Art Foundation. The Foundation owns real property at 2414 SW Andover Street, commonly known as the Frye Commerce Center. The property fronts on Delridge Way SW. Sound Transit's proposed routes in the Delridge Station area appear to impact the Property. Two of the three proposed route options involve an elevated rail line above Delridge Way SW. The third route would put an elevated line down the heart of our client's property.

This letter provides the Foundation's comments and concerns regarding Sound Transit's proposed routes around the Frye Commerce Center. The Foundation welcomes the opportunity to meet with Sound Transit's decision makers to discuss further the points in this letter.

A. Background

The Frye Art Museum has for almost 70 years provided the people of Seattle with free access to world class art. In addition to offering free admission to

the museum, the Frye is committed to community outreach and arts education, and has decades of proven success implementing high-quality arts engagement programs. Serving a wide demographic, some of the programs the Frye offers are free after-school art classes to under-served and disadvantaged students, studio workshops, art history lectures, and a creative aging program. Last year, the Frye offered over 950 programs serving more than 19,000 people.

The Museum has been successful providing all of the above thanks to the generosity of donors and the Foundation, which contributes its entire net earnings to the Museum. The Foundation's earnings are comprised of rent from tenants on properties the Foundation owns in and around Seattle. The Frye Commerce Center is one such property. The continued viability of this property is important ultimately to the Frye Art Museum's ability to continue providing the public with access to art at no charge.

The Frye Commerce Center is an approximately 4.4-acre business park located along Delridge Way SW. The Center's tenants include businesses that provide critical services to the area while contributing to the neighborhood's character. One such business includes Alki Beach Academy, a child care services provider for children aged six weeks to six years. The tenants also include a dog boarding house, a coffee shop, delis, a credit union, and other businesses all of which provide important local amenities and contribute to the character of the neighborhood.

B. Impacts of Proposed Routes

Sound Transit has proposed three options around the Center, each of which would impact the property and its tenants in unique ways. For clarity, we have attached a conceptual design depicting the three options, which we obtained from Sound Transit.

The first option is depicted in orange - an elevated line over the existing public right-of-way with the station located south of SW Andover Street. This is the Foundation's preferred option because it will have the least impact on the Frye Commerce Center and its tenants. This is not to say that the orange route has no impact, however. Based on the initial conceptual design, the orange route will impair views to the west, add new sources of noise, increased traffic, and may place new demands on parking. As noted above, the Commerce Center's tenants include a child care facility that must meet state and local standards. The Foundation is particularly concerned about the proposed routes' impact on the

child care facility's operations. As child care resources are already in short supply in Seattle, it will not serve the community's interests to lose this valuable resource.

It is also unclear whether the pylons supporting the elevated line would stand in the public right-of-way or on the Foundation's property. Installing pylons on the Foundation's property will have substantially more significant impacts, including impediments to parking and pedestrian access to facilities and, quite possibly, demolition of the facilities themselves.

The second option is depicted in red - an elevated line over the existing public right-of-way with the station located adjacent to the Commerce Center. This design would have all of the impacts of the orange route but likely at a greater level of intensity. Noise, and impacts on views, traffic, and parking would all be greater if the proposed station was immediately in front of the Commerce Center. For this reason, the Foundation disfavors the "red route."

The third option is depicted in blue - an elevated line running through the heart of the Commerce Center. This is the least preferred option. We expect it will have substantial detrimental impacts to the property and may require Sound Transit to purchase the entire site. In addition to the impacts identified above, locating the line through the heart of the Commerce Center will likely require Sound Transit to demolish or significantly damage the existing facilities. Tenants will need to vacate the property, likely never to return. The neighborhood would lose important amenities and character with no certainty that it will be replaced with like businesses. The Foundation strongly urges Sound Transit to reject the "red route" and the "blue route" in favor of the "orange route."

C. Environmental Impact Statement

Sound Transit has also invited comment relating to the scope of analysis for the Environmental Impact Statement ("EIS") regarding this project. The Foundation urges Sound Transit to review, analyze, and address in the EIS the following elements of the environment:

- soils and topography
- air quality
- noise
- light and glare
- aesthetics

- historic and cultural preservation
- vehicular traffic and parking
- movement and circulation of people and goods
- schools (including certified child care services)

The Foundation looks forward to reviewing and commenting on the draft EIS when it is prepared.

Finally, please note that these comments are preliminary in nature and based on information available on Sound Transit's website and conceptual designs. The Foundation is carefully monitoring this project and will evaluate options as Sound Transit moves through the process. The comments in this letter do not constitute a complete or final list of the environmental, commercial, and economic impacts the project will have on the property. These comments are intended to share the Foundation's initial concerns based on early conceptual design drawings.

The Foundation understands and appreciates the importance of bringing light rail to West Seattle, and it thanks Sound Transit for the opportunity to share early comments. The Foundation looks forward to working with Sound Transit in identifying the route that best balances the needs of the project with the interests of the community.

If you have questions or wish to discuss the Foundation's letter, please do not hesitate to call or write.

Very truly yours,

Hillis Clark Martin & Peterson P.S.

By 

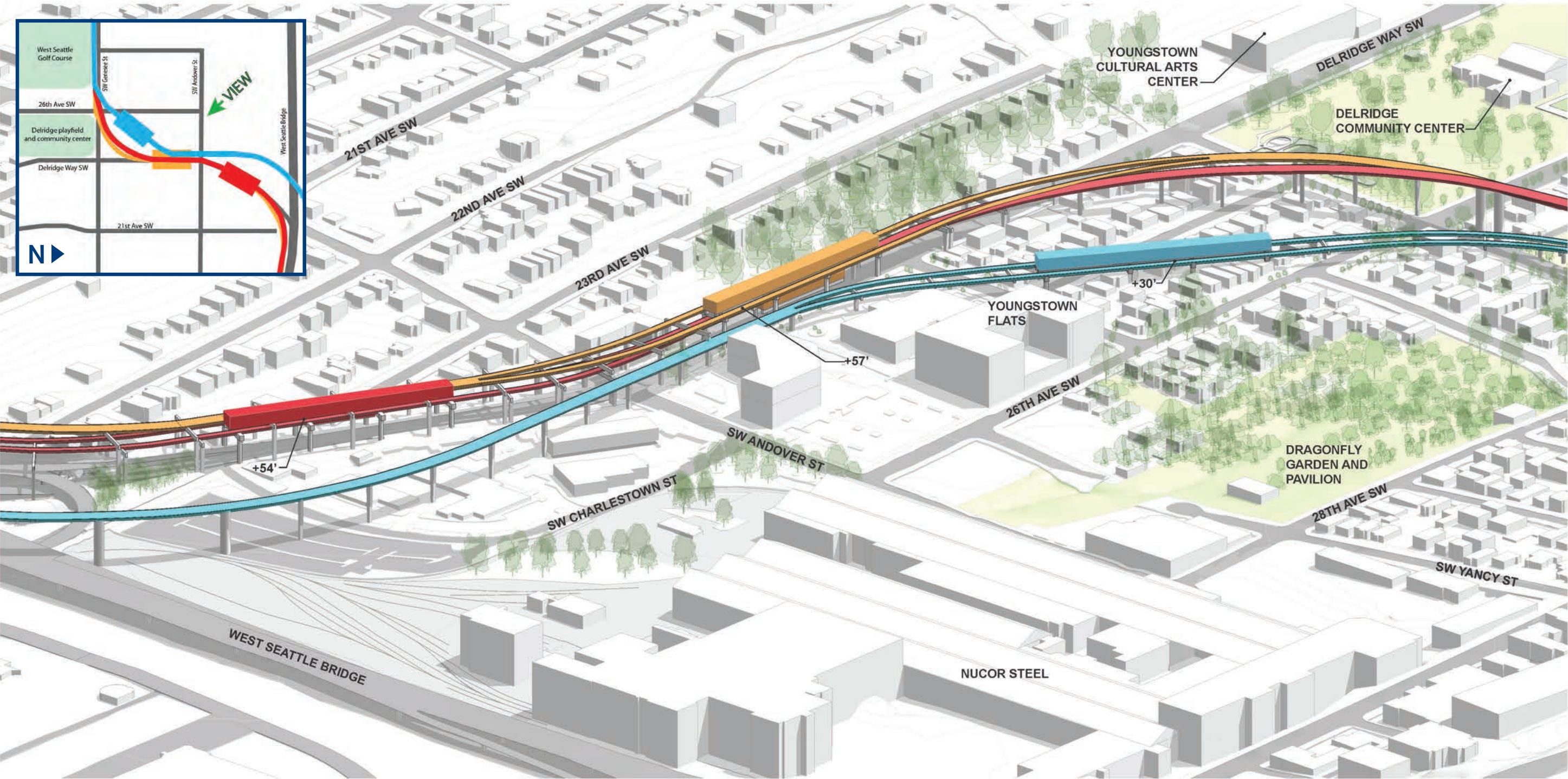
Amit D. Ranade

Enclosure

cc: Client

ND: 15071.004 4842-1222-2859v2

West Seattle: Delridge Station area overview



 VIEW LOOKING SE

This visualization is based on limited conceptual design and intended to inform comparison between alternatives.

Via E-mail and U.S. Mail

Re: Public Comment
ST3: West Seattle - Ballard Link Extensions
SODO Segment

The Frye Art Museum has for almost 70 years provided the people of Seattle with free access to world class art. In addition to offering free admission to the museum, the Frye is committed to community outreach and arts education.

and has decades of proven success implementing high-quality arts engagement programs. Serving a wide demographic, some of the programs the Frye offers are free after-school art classes to under-served and disadvantaged students, studio workshops, art history lectures, and a creative aging program. Last year, the Frye offered over 950 programs serving more than 19,000 people.

The Museum has been successful providing all of the above thanks to the generosity of donors and the Foundation, which contributes its entire net earnings to the Museum. The Foundation's earnings are comprised of rent from tenants on properties the Foundation owns in and around Seattle. The Frye Goodwill Building is one such property. The continued viability of this property is important ultimately to the Frye Art Museum's ability to continue providing the public with access to art at no charge.

The Goodwill Building is located on an approximately 3.8-acre site occupied entirely by Seattle Goodwill, an important and historic non-profit organization in our community. This building is comprised of Goodwill's main processing warehouse where incoming items are sorted and distributed to local Seattle Goodwill locations. This building also includes Goodwill's outlet and bulk-sale store open to the public; it is the last stop on the journey donated items take from the donor to recycling and disposal processing facilities. This building's location and configuration are vital to its operations - daily, large commercial vehicles and trucks are able to access the multiple loading bays and customers have an easily accessible outlet store for their needs.

B. Impacts of Proposed Routes

Sound Transit is currently studying three route options around the Goodwill Building. At least two options appear to impact the Goodwill Building in significant ways. Attached is a conceptual planning document obtained from Sound Transit that appears to depict three alternative routes for the Ballard-to-West Seattle line south of Stadium Station.

The first option is depicted in red. This option appears to run west of the railroad right-of-way abutting the Goodwill Building to the west. This is the Foundation's preferred option because it appears to have the least impact on the Goodwill Building. This is not to say that the red route has no impact, however. This route will add new sources of noise, increased traffic, and may place new demands on parking in the area. As noted above, the Goodwill Building plays a unique role in Goodwill's overall operations. It is imperative that large

commercial vehicles can access the property. In addition, increased rail traffic in the area may cause travel delays that could impact Goodwill's operations. We hope these impacts are minimized so that Goodwill can continue operations on the property; it will not serve the community's interests to lose this valuable resource.

The second option is depicted in yellow and brown. This route appears to have a direct impact on the Goodwill Building - possibly requiring changes to or a complete demolition of the existing Building structure.

The third option is depicted in shades of blue. This route also appears to have a direct impact on the Goodwill Building, including possible changes to or demolition of the existing Building structure.

For perhaps obvious reasons, the Foundation strongly opposes the second and third options. These options would likely require Sound Transit to take the entire property and would result in Goodwill vacating this unique Building. Goodwill's ability to find a site with similar access and location is uncertain at best. Our community could lose a valuable employer and resource. The Foundation urges Sound Transit to reject the second and third options in favor of the first option, which appears to locate the new line on the west side of the existing railroad right-of-way without impact to the Goodwill Building.

C. Environmental Impact Statement

Sound Transit has also invited comment relating to the scope of analysis for the Environmental Impact Statement ("EIS") regarding this project. The Foundation urges Sound Transit to review, analyze, and address in the EIS the following elements of the environment:

- soils and topography
- air quality
- noise
- light and glare
- aesthetics
- historic and cultural preservation
- vehicular traffic and parking
- movement and circulation of people and goods
- schools (including certified child care services)

Lauren Swift, Sound Transit

April 1, 2019

Page 4 of 4

The Foundation looks forward to reviewing and commenting on the draft EIS when it is prepared.

Finally, please note that these comments are preliminary in nature and based on information available on Sound Transit's website and conceptual designs. The Foundation is carefully monitoring this project and will evaluate options as Sound Transit moves through the process. The comments in this letter do not constitute a complete or final list of the environmental, commercial, and economic impacts the project will have on the Goodwill Building. These comments are intended to share the Foundation's initial concerns based on early conceptual design drawings.

The Foundation understands and appreciates the importance of bringing light rail to Ballard and West Seattle, and it thanks Sound Transit for the opportunity to share early comments. The Foundation looks forward to working with Sound Transit in identifying the route that best balances the needs of the project with the interests of the community.

If you have questions or wish to discuss the Foundation's letter, please do not hesitate to call or write.

Very truly yours,

Hillis Clark Martin & Peterson P.S.

By 
Amit D. Ranade

Enclosure

cc: Client

ND: 15071.004 4835-5802-7919v2

West Seattle and Ballard

Link Extensions

SODO segment - Level 3 alternatives



LEGEND

ST3 Representative Project	West Seattle Elevated/C-ID 5th Ave/Downtown 6th Ave/Ballard Elevated	West Seattle Tunnel/C-ID 4th Ave/Downtown 5th Ave/Ballard Tunnel
Elevated alignment	Elevated alignment	Elevated alignment
Surface alignment	Surface alignment	Surface alignment
Tunnel alignment	Tunnel alignment	Tunnel alignment
Elevated station	Surface station	Tunnel alignment option
Surface station	Tunnel station option (shallow or deep)	Surface station
Tunnel station		Tunnel station option (shallow or deep)

Approximate portal location	Existing elevated alignment	Existing surface alignment	Existing tunnel alignment
Street overpass	Existing surface station	Existing tunnel station	





Community Recommendations for Sound Transit

Background

For the past 47 years, CISC has been helping immigrants throughout King County achieve success in their new community by providing information, referral, advocacy, social, and support services.

CISC is committed to advocating for environmental justice for immigrant communities through the following guiding principles: • community driven strategies, • the influence and decision making of those most affected, • strong accountability, and • solutions that recognize complexity and interdependence, as stated in the Equity and Environment Agenda, released by City of Seattle in 2016.

We really appreciate Sound Transit's effort in reaching out to the community of colors in the area for inputs and feedback of the project and make sure all voices will be heard. It's a very valuable opportunity and experience for non-English immigrants to be able to participate in civic matters, especially the one may have impact to their everyday lives.

After the community engagement process related to the West Link Light Rail station kicked off in 2018, CISC saw a gap related to who and how community members were engaged. Thus, in late 2018, CISC conducted two community meetings for Chinese immigrants at our headquarters in the Chinatown/International District. More than 75% of the participants are parents with children. Childcare was provided in the meeting. In general, participants at the community meetings were very excited about the expansion of the new light rail project in the Chinatown/International District neighborhood. They actively shared their expectations, concerns, and questions and how would they like to receive future updates on this project's progress.

Focus of the Community Conversation

The discussions at our community meetings focused on the following key areas:

1. Expectations related to the new light rail station
2. Questions about the construction project and light rail
3. Access information and updates about the project
4. Feedback channels



Highlights from the community meeting discussions included:

1. Expectations for the New Light Rail Station

- **Accessibility** – Participants expected that the station entrances/exits would be accessible for seniors, people with mobility issues, and families with children in strollers. Seats should also be available in the waiting area, as well as restrooms and a family room.
- **Safety** – Strict safety measures should be in place to reduce/minimize the risks for riders when boarding the escalators or elevator, especially senior riders, riders with mobility issues and families with young children. A safety plan should be made clear to the community in the event of a disaster, such as an earthquake.
- **Usability** – The station should include clear, multilingual signs with graphic illustrations, good interior lighting, and ventilation. A simple transfer process to other forms of transportation should be in place at the new station. They felt it was important to minimize the amount of walking and the length of the wait time related to such transfers.
- **Community Centric** – The new station should reflect community values and cultures in the Chinatown/International District. Efforts should be made to collaborate with community members on the co-design of the exterior and interior of the station.
- **Education/Empowerment** – Community members should be well informed of the potential and actual environmental and economic impacts before, during and after the construction.

2. Questions

- **Funding of the project** – What is the participation of the federal government, Washington State, King County and the City of Seattle? Is there the possibility of acquiring additional tax dollars for the project?
- **Environmental Impacts** - What are the environmental impacts and safety concerns (especially due to Seattle's location in an earthquake zone)? What about the impacts of noise pollution and air pollution during construction?
- **Emergency Plan** - What is the emergency plan in case of a natural disaster such as an earthquake or a blackout? How will riders and community members be informed?



- **Big picture** – What will the infrastructure look like? Will there be additional parking for park and ride? How will people living in the neighborhood and people who are coming in and going out of the area be impacted?

3. Access Information/Project Updates

- **CBOs** – Community members would like to receive updated information on the project through/at community-based organizations in the neighborhood. In-person communication is preferred.
- **Language** – Information should be shared in languages community members can understand, including high level and technical information, whether it is through in-person communication or through mailers and other publication materials.
- **Other Communication Channels** – Other recommended communication channels include making information available through local newspapers; publications available in libraries, supermarkets, schools, etc.; and/or by phone, email and other multimedia.

4. Feedback/Comments

- **In-person Communication** – Community members identified in-person communication as the most preferred way of giving feedback to the project staff.
- **Multimedia Channels** – In addition to in-person communication, other multimedia channels for feedback/comment should be available in languages spoken by the community members.

Recommendations from CISC

Based on our organization's day-to-day experience of working and communicating with immigrants who rely on public transportation for their transportation needs and to make sure their voices are heard, CISC would like to make the following recommendations to Sound Transit regarding to the new construction project of the light rail in the Chinatown/International District:

- **Engagement is empowerment, empowerment starts with education** – For non-English speaking stakeholders, information is knowledge, which empowers them to be involved in civic matters. Immigrant stakeholders should be informed about all possible environmental, health and economic impacts associated with the expansion of the light rail to the Chinatown/International District. Therefore, educational elements should be incorporated into the public engagement materials.



CISC

BRIDGING CULTURES
COMMUNITIES & GENERATIONS

611 S Lane St
Seattle WA 98104

T 206.624.5633
F 206.624.5634
cisc-seattle.org

- **Partnerships with local gathering places for stakeholders** – Establish partnerships with community-based organizations, schools and libraries in the Chinatown/International District and Beacon Hill neighborhoods, where most stakeholders reside, in order to create an engagement plan related to when and how project information will be disseminated to non-English speaking immigrants.
- **Ongoing community engagement** – Prioritize periodic in-person community engagement activities at different popular locations in the neighborhoods where most stakeholders reside or gather. Provide on-going updates of the project via different communication channels such as local newspapers, brochures, and mailers. Information about key aspects of the project and its progress should be available in languages spoken by the stakeholders. This should be an ongoing cumulative process in which relationships and trust will be built and strengthened throughout the process.

As stated in our mission, CISC is committed to bridging cultures, communities and generations by creating opportunities for immigrants to succeed while honoring their heritage. For questions related to the community meetings and our recommendations, or in case there is any way CSIC would be able to further support Sound Transit in outreaching to non-English speaking immigrants, please feel free to contact Karia Wong at kariaw@cisc-seattle.org or 206-957-8538.

Denny Triangle Neighborhood Association

c/o 1700 Seventh Avenue, Suite 1800, Seattle, WA 98101

West Seattle and Ballard Link Extensions EIS Scoping
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Monday, April 1, 2019

Via eMail: wsbscopingcomments@soundtransit.org

Dear Ms. Swift,

The Denny Triangle Neighborhood Association submits the following thoughts for consideration in scoping of the Environmental Impact Statement for the Sound Transit West Seattle and Ballard Link Extensions through the Denny Triangle and South Lake Union neighborhoods.

Perhaps the most significant urban revitalization in America today, the economic vitality and urban vibrancy of Denny Triangle is critical to Seattle's emergence and competitiveness as a driver of the global technology and diverse mixed-use real estate economies. Its success is predicated on the community-driven and City-adopted principles outlined nearly a decade ago in the [SLU Urban Design Framework](#) and [SLU/Uptown Mobility Plan](#).

South Lake Union and Denny Triangle stakeholders are in consensus that the "Blue Line" configuration with station facilities at 1. Denny Way / Westlake Ave. and 2. Harrison Street / Dexter Ave. best serve our North Downtown communities. These locations provide the best access to the high-density commercial and residential populations both south and north of Denny, including the SLU core and new employment centers north of Mercer Street along with multiple access points and intuitive walksheds to the Seattle Center.

Transit Oriented Development and/or access points to station facilities in partnership with existing property owners is desirable, and the utilization of surplus City of Seattle properties at or near system access points provides opportunity to ease deficiencies in Seattle's workforce and low-income housing inventory.

While the benefit of the West Seattle and Ballard Link Extensions is profound, our community strongly encourages Sound Transit to consider the following impacts of the construction process and system configuration on its scoping of the EIS.

Existing Transportation Infrastructure: Existing mobility infrastructure in South Lake Union and Denny Triangle has already been heavily impacted by an unprecedented quantity of commercial construction as well as the installation of the new electrical distribution system disseminating from the Denny substation. Construction of a station facility at the Denny Way / Westlake location is expected to disrupt existing Bus Rapid Ride service along Westlake Avenue and Denny Way and existing Streetcar service along Westlake Avenue. Both essential to the South Lake Union and Denny Triangle workforce. Furthermore, it is essential to consider the importance of efficient and unimpeded operations of private-

workforce bus service operated by neighborhood employers. The impacts associated with construction of the new stations must be sensitively mitigated to minimize disruption to business activities and residential life.

Pedestrian Flow and Safety: The safe, intuitive and efficient passage of pedestrians is crucial in South Lake Union and Denny Triangle. Close attention will be necessary to mitigate the pedestrian barriers that currently exist at Denny Way and Westlake Avenue to the south and Mercer Street and Dexter Avenue to the north. Exploring the utilization of station facilities and their access points as innovative passages to cross these barriers is encouraged.

Businesses: While the reasonably "short-term" impact of construction on local businesses is understandable, it is critical that intuitive and safe access to businesses be consistently provided, both for the local workforce and for visitors. These impacts should be considered not just on the major employers but also on the viability of street-side retailers that provide diversity and the defining character of South Lake Union and Denny Triangle. Other major considerations include the impacts of sidewalk closures, construction vibration (especially on the health-sciences infrastructure) and potential disruptions to freight hauling and short-term street parking.

Environment: Environmental concerns include noise, light pollution (if construction is allowed after daylight hours), air-borne particulate matter and storm water and construction run-off.

Impacts to The Neighborhood & Livability: "Livability" is an important byword in South Lake Union and Denny Triangle. It is essential to maintain a construction-period aesthetic that is commensurate with the community character and cultural life of North Downtown.

Permeability through the transportation infrastructure within our community can enhance neighborhood livability and improve the usability of the facility itself.

We strongly encourage the incorporation of public art, landscape planting and a variety of cultural amenities, not just within the boundaries of station facilities, but extending into the neighborhood. These could be project specific or implemented in conjunction with existing or planned cultural improvements, especially streetscape improvements.

Finally, while we are focused specifically on South Lake Union and Denny Triangle, it is imperative that corridor configuration, infrastructure and planning elsewhere in the line be designed to avoid a negative impact on system reliability. There is concern that system disruption resulting from bridge openings and other issues would negatively impact confidence in the system and ultimately ridership.

The community leaders of South Lake Union and Denny Triangle look forward to working together with Sound Transit in the efficient construction and timely completion of the West Seattle and Ballard Link Extensions.

Respectfully,

A handwritten signature in black ink that reads "Howard Anderson". The signature is fluid and cursive, with the first name "Howard" and last name "Anderson" clearly distinguishable.

Howard Anderson, Chair
Denny Triangle Neighborhood Association



Downtown Seattle Association

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

April 1, 2019

Dear Ms. Swift,

On behalf of the Downtown Seattle Association, I want to thank Sound Transit for your continued comprehensive process in evaluating alignment and station options for the West Seattle and Ballard Link Extensions Project.

In 2016, we shared with you three principles that remain relevant today, that we believe important to informing these significant investments:

1. Investments must focus on serving current and future jobs, residential hubs, cultural assets and regional growth centers.
2. The alignment should maximize overall capacity and ridership, but not at the expense of existing modes of transportation or the existing right of way.
3. We should build for the long-term, to prepare for future demand and flexibility as well as to allow future expansion of lines through Ballard and West Seattle.

The efficient movement of people and goods to and within downtown Seattle is vital to our urban core and regional economy. Downtown Seattle's ability to attract and retain businesses, residents, and visitors depends on a robust transit system and it is for these reasons that the DSA and its members actively supported Sound Transit 3.

As we consider the 100-year investment that Sound Transit is making in downtown as a part of the West Seattle and Ballard Link Extensions Project, we want to ensure it supports the growth of the center city for decades to come and leverages the existing neighborhood assets. In review of the project Purpose and Need statement, we urge you to study the following as part of your environmental review:

- Study all options in the Level 3 analysis in the Draft Environmental Impact Statement. At present time, there is not enough information to determine if any of the identified stations or alignments are technically and financially feasible to build, operate and maintain.
- IDS/Jackson Hub must have in-station, accessible, quality, and easy-to-navigate transfers between light rail, Sounder and Amtrak in an effort to develop the area meaningfully for residents of Chinatown ID and Pioneer Square as well as users of the entire system.
- Review 4th Avenue alignments and stations in the options under the environmental review, to better connect our existing transit assets and minimize neighborhood disruption and construction impact.
- Evaluate cost sharing opportunities/efficiencies with the Seattle Department of Transportation regarding the replacement of the 4th Avenue Viaduct.
- Study usability impacts, such as decreased ridership and burdensome and lengthy transfers, associated with creating deep mined stations that are only accessible via elevator.
- Evaluate and address impacts to vulnerable populations in the CID and Pioneer Square.
- Review the opportunity for a below-grade connection from a 5th or 4th Avenue Station in the CID through to the King Street Station and Amtrak and Sounder.

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Todd Timberlake

Bill Weisfield

Amy White

Donald Wise

Sung Yang

Emeritus

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Joshua Green III

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John Hanley

Yogi Huttsen

Stephen Koehler

Bill Lewis

Jane Rakay Nelson

Richard Redman

J. Michael Rona

H. Jon Runstad

Judith Runstad

Richard Stevenson

Frederic Weiss

- Address opportunities for meaningful Transit Oriented Development in construction and station area planning across the system. Specific areas of interest include SODO station and Ryerson Base area, CID/Pioneer Square and Westlake.
- Create meaningful opportunities for bus/streetcar to rail transfers at major hubs and at the end of the lines. This includes ensuring bus and streetcar operations are not unduly impacted by construction or operation of light rail.

Additionally, in order to create a world-class transit experience, we request Sound Transit study the reconfiguration of Union Station Plaza to create a premier transfer environment and community asset with programmable public space while reactivating Union Station as a functioning transit station that incorporates retail and activation while maintaining access to light rail, Sounder and Amtrak service.

Finally, regarding overall impacts to the transportation system, any significant disruption of streetcar operations during future light rail station development is unacceptable and will negatively impact mobility. As stated in the beginning of this letter, our second principle is to "...maximize overall capacity and ridership, but not at the expense of existing modes of transportation or the existing right of way." The Center City Connector Streetcar is scheduled to be complete in 2025. Streetcar operations must not be truncated in Chinatown or at Westlake during construction of ST3. As part of scoping and environmental review, Sound Transit should study all options to keep the streetcar operating through construction, impacts to streetcar operations associated with construction and costs associated with re-routing or other mitigation measures. Sound Transit should assume responsibility for the costs associated with these potential impacts.

The benefit that ST3 will provide our city and region will be significant. Station design and the ultimate configuration of the alignment should be evaluated and developed to reflect the long-term nature of this investment. We understand the complicated partnerships that are likely required to accomplish these goals and we stand ready to assist. Thank you for your continued thoughtfulness and stewardship of the investment voters have entrusted to you.

Best Regards,

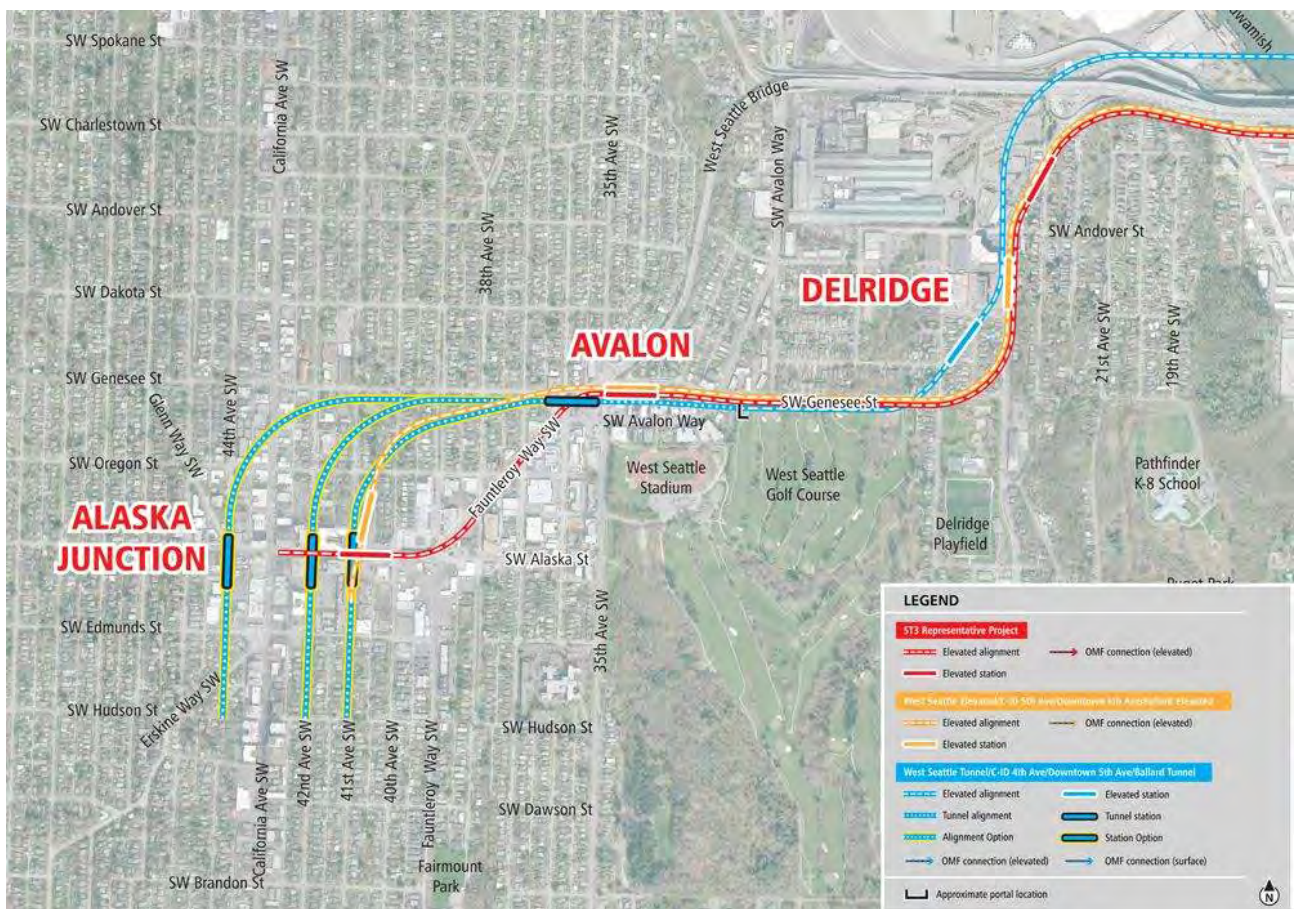


Don Blakeney
VP, Advocacy & Economic Development
Downtown Seattle Association

EAST ALASKA JUNCTION NEIGHBORHOOD COALITION

EIS Scoping Comments West Seattle and Ballard Link Extensions

[April 2019]



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Executive Summary

The membership of the East Alaska Junction (EAJ) Neighborhood Coalition believes:

1. A tunnel is the best option for delivering light rail service to West Seattle and Alaska Junction based on the available alternatives.
2. The current “Yellow/Orange” Elevated Alternative will create a permanent scar across a thriving East Junction community; one that is a vibrant, evolving tapestry of single and multi-family residential housing.
3. Any above ground option entering the Junction will set a terrible precedent for future light rail expansion. If elevated, any progress south to neighborhoods like High Point, White Center, and Burien will involve the decimation of hundreds if not thousands of West Seattle residences, forever altering West Seattle and creating an artificial barrier between neighborhoods.
4. Light rail is a generational decision. The options chosen will be in place for the next several decades. Decision makers and planners should not be tempted by quick and easy alternatives, but instead support and build something the entire community can be proud to pass on to future generations of Seattle.
5. Prior alternatives, including the “Purple” Pigeon Ridge / West Seattle Tunnel, Level 2 Alternative (“Purple Line”) and “Pink” Yancy Street / West Seattle Tunnel, Level 1 Alternative should be brought back for analysis during the EIS.

The subsequent pages of this report present the coalition’s views within the framework of environmental impact studies.

About the East Alaska Junction Neighborhood Coalition

We are local residents advocating for well-planned transportation in West Seattle. We support and look forward to the arrival of a new Link Light rail extension in our area but have concerns about the proposed plans and their impacts on the East Alaska Junction area. Our coalition has more than 50 active members and our website can be found at www.eastjunctionneighbors.org. If you have any questions or comments, you can email us at eastjunctionneighbors@gmail.com. The report below was prepared in collaboration with members of the coalition.

Signatures

The report above was prepared in collaboration with members of the coalition whose name are listed below:

#	Name	Email
1	Amir Sadrpour	elexira@yahoo.com
2	Jen Shaughnessy	jennifers@johnlscott.com
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6	Paul Dieter	pauldieter@icloud.com
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1. Acquisitions, Displacements, and Property Value

Construction Clearance

All of the current route proposals result in direct adjacency to residential properties. Sound Transit representatives have told property owners the guideway could come within 10ft of their property line or home. This adjacency will undoubtedly affect environment quality, property value, and safety.

We strongly suggest Sound Transit perform a through analysis of rail proximity to any inhabitable property and identify its impact on, but not limited to, the following issues: air quality, vibration, electromagnetic interference, soil stability, groundwater, runoff, access to natural light, and access to existing natural or urban views. For any of these issues (or any others identified by Sound Transit), Sound Transit should quantify the impacts as related to human health, safety, and property value. These issues should be analyzed as related to both construction and after completion.

Additionally, we strongly recommend Sound Transit identify and directly notify all property owners affected by any of these issues and relay the potential impacts as identified in their analysis. It is not enough for Sound Transit to only contact properties taken as part of Eminent Domain; if a property owner experiences any direct adverse impacts, it should be incumbent upon Sound Transit to alert them of the potential issues prior to final route selection.

Scale of Acquisitions

Within an area of less than 30 acres, and for a segment of less than 1 mile of track, the current “Yellow/Orange” line would require the demolition and taking of well over 100 properties, while creating substantial negative impacts on at least 50 to 100 more. This scale and density of community impact appears to be unprecedented in any light rail expansion project. Sound Transit was able to avoid hundreds of homes in the neighborhoods like Beacon Hill, the U-District, Roosevelt, and Maple Leaf by utilizing tunnel construction. If a tunnel was viable for these neighborhoods, why is it not the primary option for Delridge, Avalon, and Alaska Junction? How does the scale of the acquisition compare to other Link light rail expansions?

Proximity of Lines and Property Values

We recommend Sound Transit study the impact of elevated trains on property values. As there appears to be almost no precedent in Seattle for elevated rail passing through such dense, single-family, residential, this study should include data from other cities and should compare the values of similar properties in similar neighborhoods that are within 50 and 100 and 200 and 500 and greater than 500 feet from an elevated line.

Displacement in the Midst of Housing Shortage

Given the lack of affordable housing in Seattle, or any readily available housing stock is a well-documented and growing problem [1]. Sound Transit should carefully consider the implications of displacing (by its own estimates) more than 100 households when there are other viable options for development that would be far less disruptive, while keeping land on the table for future, transit-oriented development to better support Seattle’s future housing needs. Sound Transit should also consider the broader impact the elevated “Yellow/Orange Line” would have on the

community given that many of the displaced households include current (or future) students enrolled in neighborhood schools.

Property Values during the Long Construction Stage

There are still years of planning ahead of home acquisitions. How will Sound Transit account for this during property evaluations? If sales stagnate during this planning period, will Sound Transit compensate homeowners accordingly?

Remedial Actions for Impacted Unacquired Houses

What factors and remedial actions does an EIS consider for properties that are not acquired but are negatively impacted by their close proximity to the elevated lines? This can be measured in terms of noise, traffic displacement, safety concerns, etc.

Social Impact on Relocated Residents

It may be assumed that many residents subject to relocation along the Yellow alignment have chosen to live in the interface between the urban village and established single-family homes. After displacement, what reasonable opportunity for relocations exist that offer the same lifestyle and quality of life people have chosen?

2. Alternatives (Route, Station Locations)

Phasing of Avalon Station

We believe that the Avalon station should be tabled from the current project scope and proposed as a “Phase-2” infill; similar to the S Graham Street Station; with any associated cost savings dedicated to funding the tunnel. The walksheds for Junction and Delridge stations already overlap in the location proposed for the Avalon station. A station at this location would serve a limited walkshed [10], destroy roughly 60 homes, and not serve as a robust transit connector.

What is the methodology used to determine the need for two stations within a 10-minute walkshed? This is crucial information since bus routes can be diverted for convenient transfers.

Are two stations necessary in such close proximity? Can shuttles/buses take less mobile riders to Junction and Avalon destinations? As bus ridership will likely go down with the introduction of light rail, has the reallocation of these resources to inner-west Seattle transit been considered and studied? This currently a need in West Seattle.

Current West Seattle proposals have fundamental problems

After more than a year of study and public commenting, PST has proposed an ST3 representative line that is deemed difficult for future expansion, a tunnel option that requires as-of-yet unsecured additional funding, and a destructive and unpopular elevated (yellow) rail line. We reviewed the detailed proposal document [2] to see if public comments inspired the current proposals, but nothing could be found. Consequently, we urge members of the ELG and Sound Transit Board to reconsider past alternatives.

Sound Transit Alternative Selection Process

Why did so few options make it to Level 3 for EIS consideration (compared to the quantity taken through EIS on ST2)? Is this an over-correction by Sound Transit to speed up the development

process at the detriment to residents and transit users? Have some good options dropped off the table because of schedule or desire to streamline the process?

Elevated Line & Destructive Future Expansion

The Alaska Junction Station associated with the elevated “Yellow/Orange Line” has been oriented North/South to allow for future extension of the light rail south the White Center and Burien. However, key expansion details are missing. Will future expansion of elevated line lead to more acquisition of houses along 41st Avenue? Will the scale of these acquisitions be even greater than in the Delridge/Avalon/Junction area? The 41st Avenue south of Alaska junction has a steep grade that poses challenges for future elevated expansion.

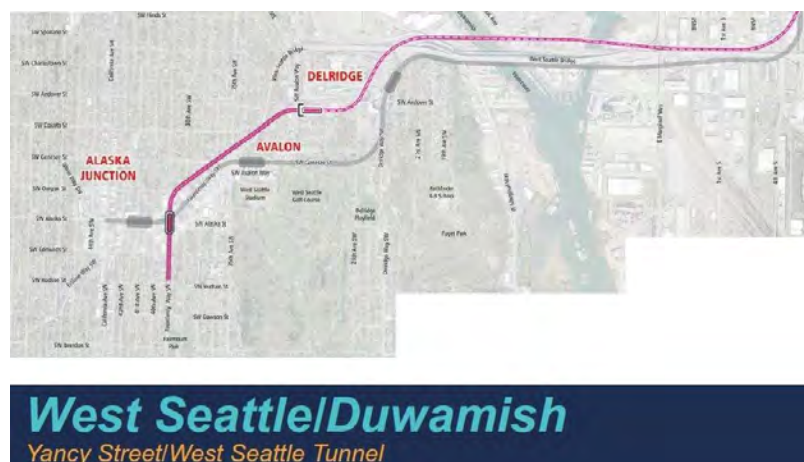
Future expansion of the elevated “Yellow/Orange Line” seems to continue the destructive nature of the current options but at a much larger scale. Residents have been told that this option exists to meet the desire for future southern expansion, but does not address any of the issues associated with such expansion or the scope of its incursion into the neighborhoods of West Seattle.

Expansion from Delridge

If the goal of creating a north/south facing rail is for potential expansion, is the Alaska Junction the correct jumping off point? Would expansion of the line South make more sense from Delridge?

Past Proposals to be Revisited

A) Yancy Street / West Seattle Tunnel, Level 1 Alternative (“Pink Line”)



The “Pink Line” alternative [Yancy Street / W. Seattle Tunnel], either as a tunnel or elevated, uses Fauntleroy Way SW for southward expansion minimizing its residential disruption. It also greatly diminishes the housing displacement in the North Delridge neighborhood and the potential environmental impact on the Delridge Park, Longfellow Creek area and the W. Seattle Golf Course (three significant green spaces in the area). While the Pink Line as currently proposed does not reach the “center” of Alaska Junction, it is within the 5-minute walkshed, and provides several advantages in terms of future expansion and cost.

As currently drawn, this option has some issues that will need to be addressed—specifically where the Delridge Station is located and the fact that there are only two stations in WS, not

three. Sound Transit has said all along that there are opportunities to mix and match elements from different proposals, so there may be a way to shift the Delridge Station in this option farther to the east—perhaps near the strip mall on Andover and Delridge. And looking at the map, it does seem possible that the ending station could be situated elsewhere in the Junction. But, again, this route—with modifications— solves several issues that have arisen in the various discussions:

- It has a much lower impact on Youngstown housing.
- The above ground portion in Delridge along Yancy minimizes or eliminates the impact of an elevated guideway on the Delridge park, golf course, Longfellow Creek area and other green spaces.
- It would lead into a tunnel that would enter the Junction underground - eliminating the housing and commercial disruption that would be caused by an elevated guideway in the Junction area.
- It would, more than the other options discussed, go a long way toward providing good transportation while preserving the small town feel, the housing, and the green spaces that make West Seattle a human-scaled and vibrant community.

We urge you to put this option back on the table and consider how best to modify it to meet the needs of various constituencies.

B) Pigeon Ridge / West Seattle Tunnel, Level 2 Alternative (“Purple Line”)



The “Purple Line” alternative [Pigeon Ridge / W. Seattle Tunnel] passes underneath Pigeon Ridge greatly minimize impacts to the Youngstown and Delridge neighborhoods while still maintaining three station locations (equivalent to the ST3 proposal). Additionally, as shown in the Level 1 design, the station reaches the center of Alaska Junction with a station at 42nd and could easily include a sub-option of 41st.

As drawn in Level 1, this design would need to overcome several disadvantages - specifically potential impacts on four parks, (Delridge Playfield, Pigeon Point Park, West Duwamish Greenbelt and West Seattle Golf Course), and the additional cost for a tunnel

through Pigeon Ridge. However, as noted, this option solves many issues raised through this process:

- It has a much lower impact on Youngstown and Delridge properties.
- The Delridge Station location is well positioned to serve communities both north and south of the Delridge Playfield - expanding the station's potential walkshed.
- It would lead into a tunnel that would enter the Junction underground - eliminating the housing and commercial disruption that would be caused by an elevated guideway in the Junction area.
- It maintains three station locations in equivalence with ST3.

We urge you to put this option back on the table and consider how best to modify it to meet the needs of various constituencies.

3. Construction Impacts

Construction Staging and Property Acquisition

The EIS should clearly define the staging area needed for construction of the yellow line in the very compact residential area between 39th and 41st Avenue SW. We simply do not see much space for construction materials or machinery. The EIS should determine if additional houses need to be acquired or will be impacted beyond the standard clearance around the yellow line for the purpose of construction.

Impact of Construction on Residential Areas

What is the mitigation plan to affected neighbors during construction, operation and maintenance considering the close proximity of the elevated lines to residential area?

Underestimating the Cost and Impact of Construction in Residential Area

King5 News published an article titled "Sound Transit using bully tactics, Bellevue neighbors say" in February 2018 [3]. The article states PST has offered \$300 compensation to impacted neighbors from the light rail construction. The article states PST would end up paying \$11 million in legal fees to fight the unhappy residents. EIS should closely study the true economic cost of construction in West Seattle village hub.

4. Economics and Cost

EIS to Provide more Accurate Cost Analyses

Similar tunnel construction projects across Seattle have yielded lower cost. For example, UW tunnel was \$600M per mile yet the tunnel to the Alaska Junction Station (less than one mile) has an initial projected overage of \$700 million. Was \$150-300 million per mile of elevated cost subtracted?

EIS to Comprehensively Study the Cost of Elevated Lines

- How are the costs of relocating affected overhead utilities being factored into the budget?
- Is Sound Transit considering compensation to affected neighbors by the construction?
- Does staging and machinery require additional property acquisitions?
- Does cost comparison consider the long-term effect of lost property taxes by the demolished properties?

Permanent Loss of Tax Revenues from Demolished Houses

Sound Transit has identified a \$700 million cost increase associated with the tunnel option. However, this only captures “day-one” costs (such as construction and home acquisition). As part of the financial analysis, Sound Transit must also account for “day-two costs” (lost property taxes, track maintenance, future land use). For every home Sound Transit demolishes, the city loses a source of tax revenue. This loss is not merely on day one, but in perpetuity. A more accurate financial picture should illustrate how “day-one” construction costs might be offset by the change in annual property tax revenue over some long-term period (possibly to determine a break-even point – if one exists). This loss in revenue stream is exacerbated by the fact that most properties slated for demolition were intended to be up-zoned to LR-2. However, as acknowledged by the Seattle City Council, the proposal of property acquisitions by Sound Transit is the only reason the up-zoning has gone on hold [9]. The City Council has also acknowledged that if the light rail does not go through these blocks, it is very likely these properties will be reconsidered for up-zoning once an alternate LR route is selected. It is therefore necessary for Sound Transit to analyze property value and tax revenue at both Single Family (SF) zoning as well as Low-Rise (LR-2) density (as proposed by MHA).

Identify Third-Party Funding Sources for the Tunnel Proposal

Capitol Hill, the University District, Roosevelt, Beacon Hill, and Bellevue tunnels are a testimony that when Sound Transit, City officials, and Politicians work together they are able to find funding resources. The EIS should study how funds became available for those projects and utilize similar methods to acquire funding for this short tunnel in West Seattle.

The proposed elevated options are far less superior to proposed tunnel options:

- The elevated options will be destructive to the pedestrian-oriented neighborhood by introducing mass, noise, and physical impediments to local pedestrian and vehicular traffic;
- Involve the destruction and removal of numerous family homes.
- Make further extension to the south less feasible.

ST3 Representative Vs. Elevated Line Cost Comparison

Sound Transit has stated that the proposed “Yellow/Orange Line” is similar in cost to the ST3 representative option. The EIS should further analyze that assumption, taking into consideration the following items:

- Number property acquisitions
- Permanent loss of property tax revenue from acquired properties
- Potential loss of future, denser housing which would yield even higher tax revenue

Perpetual Impact on Businesses

How will the EIS take into account the impact on the feasibility and desire of local businesses to remain in immediate proximity to / under the light rail? Loss of local businesses would have a negative impact on liveability and neighborhood culture, as would “dead zones” of no commercial or residential use of land beneath / adjacent to the tracks. How are all of those costs assessed and/or factored into the decision-making process?

5. Ecosystems and Natural Resources

Elevated Line Impact on Trees and Natural Resources

The EIS should study the number of trees impacted. What are the resulting effects on air quality and soil retention?

6. Future Extension and Neighborhood Planning

Details of Elevated Line Expansion is Missing

There is a greater need for transportation in the Delridge neighborhood, which currently suffers from poor and limited transportation options. If expansion to Burien is in the future, would it make more sense for it to follow route 509?

The goal of a north/south alignment in the junction seems short-sighted. If the yellow line were to continue in the future, more homes would need to be acquired given the street width of 41st and its neighboring streets. Sound Transit should consider future expansion South from West Seattle that makes sense for the neighborhood (e.g., along Delridge to White Center). In this case, a north/south alignment in the junction is no longer necessary.

Impact on City Planning & Development

We strongly encourage Sound Transit to work in equal partnership with the City of Seattle’s Office of Planning & Community Development prior to selecting a final route or station location to insure proper integration and with the surrounding communities.

Sound Transit and elected officials have an obligation to follow principles laid out in Seattle’s 2035 Comprehensive Plan which provides long-term guidance about managing growth and providing services. The Plan embraces the concept of sustainable growth, race and social equity, community building, economic opportunity, and environmental stewardship.

The document outlines specific goals and policies related to transportation planning:

- (TG-1) Ensure that transportation decisions, strategies and investments support the City’s overall growth strategy are coordinated with this Plan’s land use goals.
- (TI-4) Design transportation facilities to be compatible with planned land uses and consider the planned scale and character of the surrounding neighborhood.
- (LUG-1) Achieve a development pattern consistent with the urban village strategy, which concentrates most housing and employment growth in urban centers and urban villages,

- with additional employment in manufacturing/industrial centers, while also allowing infill development compatible with the established context in areas outside centers and villages.
- (TG-2) Allocate space on Seattle's streets to safely and efficiently connect people and goods to their destinations while creating inviting spaces within the right-of-ways.

The proposed "Yellow/Orange" is in direct opposition to all of these principals. The line tears through residential neighborhood land planned for much needed desification. The required elevated guideway will dwarf the surrounding context in complete contrast to current or proposed neighborhood character.

The addition of light rail as a mode of transportation in West Seattle brings many opportunities and can be a catalyst for positive change in the region. But only through successful implementation. We strongly urge Sound Transit to abandon the proposed elevated options in favor of a tunnel option that would respect Seattle's Comprehensive Plan and the residents it seeks to protect and empower.

7. Geology, Soils, and Seismic

Is a tunnel seismically more stable than elevated?

Seismic code has increased greatly over time and continues to get more stringent. In fact, our current code is sub-par to other cities such as San Francisco, and experts are lobbying for Seattle to get safer and stricter with our seismic codes. Likely it will become more stringent with time. An example of this from the past is the viaduct. At one point in time that was considered appropriately engineered but is now unsound the primary reason for its demolition. Will Sound Transit design the tunnel or elevated line to the current Seattle code, or to more stringent guidelines adopted by neighboring cities?

Budgeting for seismic events

When assessing cost, the EIS should factor in the potential additional costs arising from a significant seismic event. The proposed route is subject to varying terrain and is within a seismically-active area. We believe it would be dishonest to assume, for purposes of cost prediction, that the proposed options would be immune to costs associated with a seismic event.

8. Land Use and Zoning

Concerns about the City's Plans for Rezoning & its Financial Impact

By her own testimony, Council Member Lisa Herbold proposed holding this land from the upzone until the light rail route is determined [4]. Zoning amendments proposed by Lisa Herbold which were voted for by City Council disadvantage property owners and benefit Sound Transit. The motives seem questionable at best. What is not yet clear is the city's plan for these parcels in the future. Sound Transit should study and reveal this information to the public. Sound transit should also study the value of the land, when upzoned, if a tunnel is built versus the value of the land and future housing development when bisected by elevated light rail.

If certain properties were held back from rezoning simply because they would be cheaper to acquire if needed for light rail, does this constitute an illegal “taking” of property? Further, if council and planners were aware of this rationale, does this constitute a form of collusion in favor of the light rail developers at the expense of citizens? Since no final plan has been adopted, why were these properties held back from upzoning now?

Long-term Effects of Eradicating Recently Rezoned LS2 Land

The value of this land for future development and transit-oriented affordable housing is proven by the city’s interest in upzoning this land (bisected by the proposed yellow line) to LS2. The below overlay shows the same parcel with the proposed yellow line. It is no secret why these blocks were held back. The yellow line proposal, if kept for study for the EIS, holds this land in limbo for years, while devaluing property for all. Sound Transit must study the impacts of this and should work in conjunction with the City of Seattle planning department to look that this valuable property and plan thoughtfully for future development, rather than piecemeal to achieve short-term goals.



9. Noise and Vibration

Noise & vibration Considerations for West Seattle

A quick look at light transit from UW to SeaTac shows that during weekdays, the interval between train arrivals are approximately 12 minutes. This is great news for most residents in the West Seattle, but not for those living around the Elevated lines. EIS should consider (1) the proximity of houses and frequency of trains in their noise and vibration analyses.

There are proven physical effects from light rail noise both for elevated and at grade. Sound Transit has had a number of serious issues with this over the years, including being over the

federal limit for noise in Tukwila in ST1 [5]. Efforts to remedy this have taken years, with mixed results [6]. The EIS must study the impact of noise as part of cutting through a primarily residential neighborhood. Please also consider that if the elevated option were selected, this would be the most residential area Sound Transit has yet disrupted anywhere in the system, greatly increasing the size and scope of the impact of noise and vibration.

Noise & Vibration and Property Values

The EIS should study and return information on how noise and vibration affect property values. The EIS cost analyses should consider remedial actions for impacted neighborhoods, or should consider that legal action by residents, including members of this coalition, will be taken in the absence of remedial actions.

Operation Schedule

Please consider all of these comments and study impacts that relate to a 20-hour schedule (current) for the trains. How would this adversely impact the neighborhood additionally should PST consider a 24-hour schedule in the future? What is the data from other cities? Are there studies of comparable areas of dense single-family housing cut through by a train or light rail? Moreover, what kind of a deadzone does this create when people don't want to live nearby, given noise and vibration impacts?

Sound Transit must also study as part of scoping, noise and vibration for height that may exceed 50 feet as proposed for the West Seattle tracks as this is unusually high for the system and, given topography in West Seattle may have unintended (and yet unknown) negative impacts on what are now quiet residential neighborhoods. Turns are loudest points on line and that would occur in the heart of the eastern flank of the Alaska Junction.

Noise & Vibration and Long Term Health Issues

Will the EIS include a study of noise and vibration levels experienced in homes that are as close to light rail as the current proposal? What are the health and wellness impacts of that noise/vibration level on residents? [amir] For example a study [7] showed that freight trains noise and vibration have an adverse long-term impact on cardiovascular functioning of persons living close to railways. We found many similar scientific studies beyond the scope of this document. The EIS study requires gathering data from other cities to obtain accurate information, since Seattle does not have a large number of homes in the same proximity to light rail as that in the proposed plan.

The EIS studies should include the following based on the ST guidelines: "Assessment of the number of potentially affected noise and vibration sensitive receivers, including residences, libraries, performance halls, schools, churches, and selected parks within 350 feet of alignment".

Human Generated Noise Due to Close Proximity to Stations

Currently, we enjoy a very peaceful, clean and quiet neighborhood. Close proximity of light rail main terminal/final station to the West Seattle Junction's dense residential areas means that thousands of people use this area for their daily commute. This cannot be without consequence in terms of noise and pollution. For example, EIS should study the impact of "human generated noises" (e.g., young children playing, people conversing etc). This factor should be considered when defining demolition clearances around the elevated lines. The EIS should also study the

impact of public littering in our beautiful neighborhoods. The remaining households around the elevated lines stations should not become victims of noise and pollution.

10. Parks and Recreational Resources

Golf Course Redevelopment

The West Seattle Golf Program does not generate enough revenue to cover its own expenses. A portion could be utilized for elevated light rail and a tunnel entrance. Additionally, a portion could be subdivided and made accessible for private development - the revenue of which could be used to help fund a tunnel. The rest of the land could be converted to a fully functional public park, or other community resources such as a library, community center, or museum.

11. Safety and Security

The hazards of an at-grade crossing with scores of children

The present rendering for the elevated 'yellow line' shows the train at grade when it reaches and crosses 39th Ave SW, potentially closing that street, north-south. Is there precedent for this kind of design anywhere else in Sound Transit's system? What are the implications? The safety impacts and danger of having a track at grade on a residential street must be carefully studied. This neighborhood, given its proximity to local schools, both private and public within blocks of the track, often is busy with groups of children of all ages walking and biking to and from school. What are the pedestrian effects of the at-grade crossing?

12. Social Justice and Equality

Housing Destruction the midst of Seattle Housing Crisis

By building elevated rail, the number of areas and the amount of property available for building affordable housing to support the housing crisis is reduced.

Elevated Line has the Largest Impact on Minorities and Low-income families

Some negative consequences of light rail are an increase in gentrification and a greater reality of displacement. A 2011 study done by Human Impact Partners in Minnesota showed that light rail and RTD expansion in their communities had at least one if not all of these negative outcomes:

- higher rate of residential and business displacement,
- increase in housing values causing fewer vacancies and
- a decrease in affordable housing, and displacement of existing residents—especially low income residents.

The study showed that there was a disproportionate impact on people of color and people with lower socio-economic status compared to white people and people with high socioeconomic status. Moreover, the risk of displacement can also lead to negative health outcomes such as infectious disease, chronic disease, stress, and impeded child development due to lack of a sense of

belonging and association to a particular community [8]. While the above impacts are common among all Sound Transit light rail proposals to West Seattle, the elevated “Yellow/Orange Line” will lead to the largest displacement and thus most detrimental impacts to West Seattle communities.

Socio-economic Displacement

The EIS should study the cultural impact of displacing hundreds of residents and replacing them with a concrete structure. For example, the EIS should study whether the light rail will attract a larger homeless community to the Junction area. The homeless community has a presence a mile away near the West Seattle Bridge concrete structures.

13. Transportation (traffic, navigation, transit, pedestrian)

Current Parking Space Shortage

Currently, many of the residents have a difficult time finding parking spaces in the junction area. The light rail will exacerbate this problem. How is PST estimating increased parking stress from neighborhood park-and-riders? [Amir] The Westlake station in downtown Seattle is an example of a light rail station with no need for parking. However, this is possible because the Westlake station is a main hub for public transportation. EIS should study how passengers will reach the light rail considering limited space on the ground

Elevated Line Impact on Car Traffic

What are the effects of vacating 39th Ave SW surface traffic flows, especially considering the existing dead end at SW 41st and the one-way block at SW 42nd? Are we to expect additional traffic on the non-arterials?

14. Visual and Aesthetics

Elevated Lines are Associated with Industrial Zones

Elevated lines in other cities (Chicago, New York, Boston) are often negatively received. In New York, these elevated lines are associated with “depressed” or “industrial” areas. How are the negative visual and aesthetic impacts considered? We must remember these impacts are permanent.

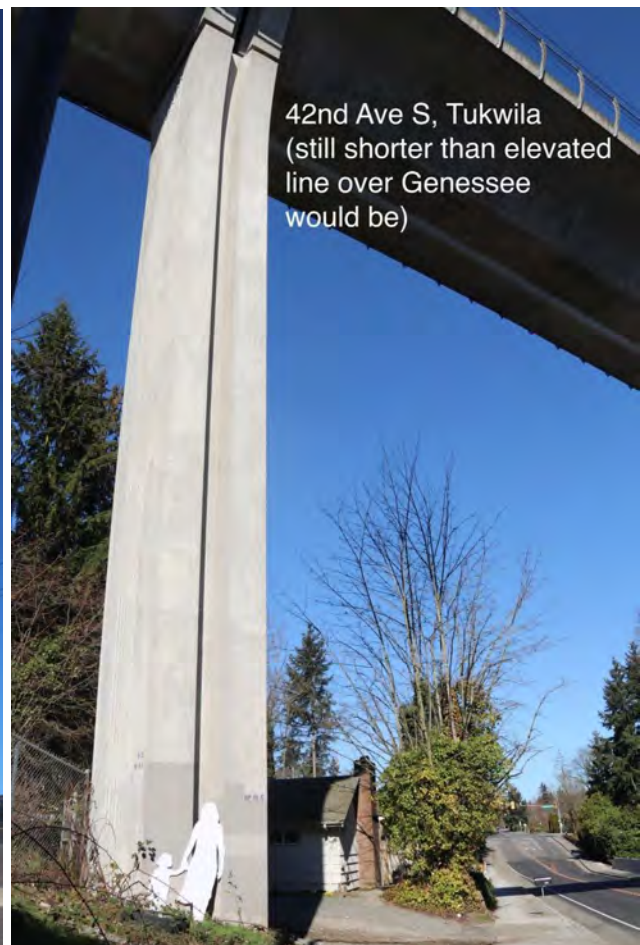
West Seattle in its current state is a highly segregated community by socio-economic standards. The introduction of an elevated rail line will serve to further segregate the neighborhoods, serving as a true barrier to the integration of social and economic statuses. Additionally, keeping the light rail, in whatever form, away from Delridge and White Center will only serve to limit the access to and from those areas by those who need this type of transportation to work, live and move freely about their city.

The city built the Alaskan Way Viaduct at time when little study was done to ascertain potential impacts to the area. It served to cut the waterfront off from the rest of the city and stifled its development and use by its residents. We have learned much from this decision in the years since but building an elevated light rail in West Seattle would show that indeed, nothing was actually learned.

Visual Studies of the Concrete Structure on Residential Neighborhood

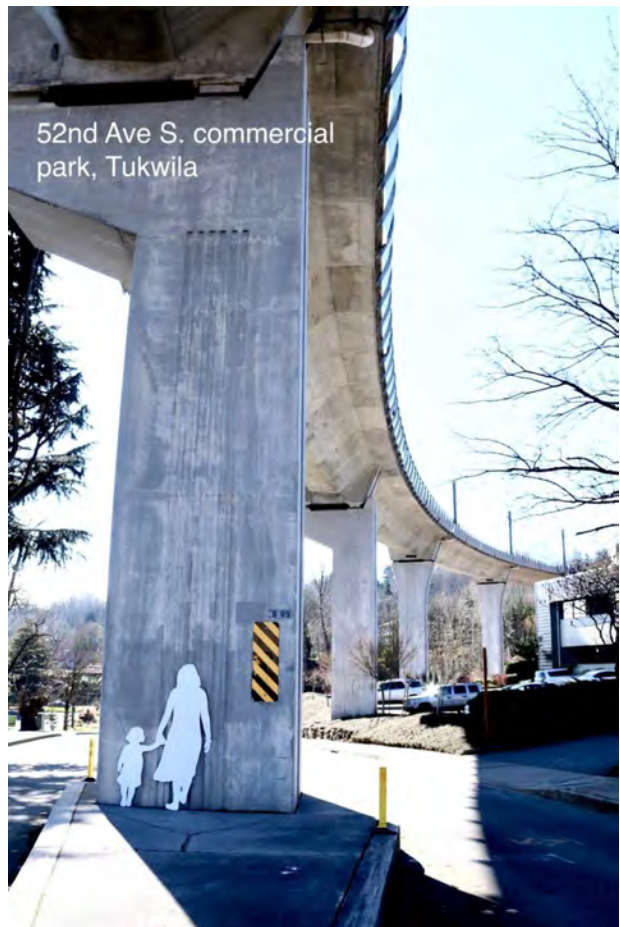
Please consider the attached images we took along the entire existing light rail line as a matter of public record in my request that future light rail in the West Seattle Junction occupy a tunnel in our neighborhood. These are meant to convey how horrifically out-of-scale an elevated option would be in West Seattle and to illustrate what will literally be replacing whole blocks of residential housing and bisecting the most walkable areas of our neighborhood.

Nowhere else along the entire light rail line is there elevated track in a neighborhood as dense as the West Seattle Junction. And, rightly so, as these lines are basically a step below normal Amtrak or BNSF rail and are far from streetcar-sized trains that fit more easily among well-developed, densified, walkable neighborhoods. The negative impact of bisecting our neighborhood with a new viaduct will be a blemish that will last for many decades. The coalition members would be more than happy to walk the scoping staff across our neighborhood. EIS and scoping staff should visit the sites in the route of the elevated line and study the visual/aesthetic impact of the elevated rails first hand.





Grime/mildew on newest track @ Angle Lake station



52nd Ave S. commercial park, Tukwila



S. 133rd St, Tukwila



Graffiti along E. Marginal, Seattle



Low, 20' side street crossing along E. Marginal Way, Seattle



MLK & Boeing Access Road, Seattle



Mt. Baker Station along MLK, Seattle



SoDo, Seattle

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March 27, 2019

Submitted via email to: WSBscopingcomments@soundtransit.org

West Seattle and Ballard Link Extensions, c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Re: Scope of the EIS for West Seattle and Ballard Link Extensions Project

Dear Ms. Swift:

This letter is submitted on behalf of the Pioneer Square International District Community Preservation & Development Authority (dba Historic South Downtown, *hereinafter* HSD). HSD appreciates the opportunity to submit input on the scope of the environmental impact study for the West Seattle and Ballard Link Extensions (West Seattle/Ballard Link) project.

ABOUT HISTORIC SOUTH DOWNTOWN AND OUR STAKEHOLDERS

HSD was created by the Washington State Legislature in 2007 in response to unprecedented impacts of ongoing construction of major public facilities, public works, and capital projects in and around the Pioneer Square and Chinatown-International Historic Districts. It was created to preserve, restore, and promote the health, safety, and cultural identity of Seattle's Pioneer Square and Chinatown-International District neighborhoods. It is governed by a board of directors elected to represent local government and business, residents, arts organizations, non-profits, and historic and cultural organizations from both neighborhoods.

Because of our focus on the vitality of the south downtown neighborhoods, Historic South Downtown and our stakeholder partners are keenly aware of the importance of the long-term nature of the work at hand. We view every decision to be made regarding the West Seattle/Ballard link as a 100-year impact decision. The result of this project must be viewed, in part, with how useful it will be to community members and commuters in 2135, as well as 2035.

The West Seattle/Ballard Link scoping period comes at a time when our communities have limited capacity to engage in the public process. Construction of SR99 Deep Bore Tunnel, Seawall, the Seattle Waterfront, and the Streetcar, as well as demolition of the Alaskan Way Viaduct has and will continue to cause disruption to the Pioneer Square neighborhood. The Chinatown-International District is still recovering from construction of the First Hill Streetcar and more than a dozen private construction projects in various stages of development. Both

neighborhoods face ongoing public construction impacts from sewer, water, and lighting system upgrades meant to benefit all of Seattle. Community members feel the burden of a hot economy and real estate market on rents and cost of living. On top of this, our neighborhoods—like urban neighborhoods across the U.S.—are grappling with the effects of rising homelessness and violent crime. All of this is taxing our resources and challenging our resilience.

It is essential that the EIS adequately recognize the nature of the affected environment. The purpose of this discussion is to ensure you fully appreciate the important characteristics of Pioneer Square and Chinatown-International District that may be affected by the West Seattle/Ballard Link project.

According to the U.S. Census, over three-quarters of the population of the Chinatown-International District and over 40 percent of the Pioneer Square identifies as minority (2012-2016 American Community Survey). Nearly 30 percent of the population in both neighborhoods have incomes below the federal poverty level (2012-2016 American Community Survey). The highest concentration of homeless people in King County is in Pioneer Square, with over 44 percent of the population homeless (2010 U.S. Census). In the three Census block groups that comprise the Chinatown-International District, 12 to 30 percent are seniors and 25 to 40 percent of households are linguistically isolated (2012-2016 American Community Survey).¹

Data from the Chinatown-International District 2020 Healthy Community Action Plan (<https://living-future.org/wp-content/uploads/2017/08/2020-CID-Healthy-Community-Action-Plan.pdf>) shows that, when compared with other neighborhoods in Seattle and King County, the Chinatown-International District shows the highest rates of mental distress, diabetes, preventable hospitalizations, and poor housing conditions. According to the authors of the Chinatown-International District 2020 Healthy Community Action Plan, these complex health and social issues result from years of historic disinvestment and institutional racism.

Despite the challenges Pioneer Square and Chinatown-International District residents face, our neighborhoods have community cohesion, or linkages that neighbors feel to one another and community services, and resources to support them. For example, there are many health and human services providers throughout Pioneer Square and the Chinatown-International District, including: International Community Health Services (ICHS), Chief Seattle Club, Seattle's Union Gospel Mission Men's Shelter, Chinese Information and Service Center, Downtown Emergency Services Center, Compass Housing Alliance, Interim Community Development Authority, and Seattle Chinatown-International District Public Development Authority (SCIDpda). There are community gathering places where neighbors come together, including: Occidental Park, Hing Hay Park, the public plazas at Union and King Street stations, Donnie Chin International Children's Park, and the Danny Woo Community Garden.

¹According to the U.S. Census Bureau, a linguistically isolated household is defined as a household in which no person age 14 and over speaks only English and no person age 14 and over who speaks a language other than English speaks English "very well".

In addition to being home to vulnerable people, Pioneer Square and Chinatown-International District are the site of some of the most precious historic resources in Seattle. The Pioneer Square Historic District was one of the first districts to be listed on the National Register of Historic Places as a district, as well as containing many buildings that are individually listed on the National Register. Pioneer Square is “Seattle’s First Neighborhood,” home of its first major business district and the location of many of the significant events during its early history. Pioneer Square also housed the city’s original Chinatown. The center blocks of Seattle’s current Chinatown-International District were added to the National Register in 1986; the neighborhood also contains many individual buildings that are both city landmarks and listed on the National Register. Chinatown-International District as a whole has played a central role in the development of Seattle and the region, as it has been home to waves of immigrants from China, Japan, and other parts of Asia who have passed under the China Gate and claimed their version of the American Dream. It is essential that any significant public investment, such as West Seattle/Ballard Link, be designed and constructed to preserve, and not impair, the historic resources of these two historic neighborhoods.

Finally, the hard work of leaders within both communities has established a culture where a lively street-level environment with enticing shops and restaurants has encouraged business investment, attracted homeowners to live and work in the neighborhood, and generally maintained a “virtuous circle” in which the quality of one aspect of the neighborhood attracts the elements required to enhance other aspects of the neighborhood. But that virtuous cycle is both difficult to create, and fragile.

The EIS must fully analyze the impact of the design and construction of the West Seattle/Ballard Link on the larger qualities of Pioneer Square and Chinatown-International Districts, to ensure that in the name of providing mass transit, the Project does not damage the quality of two very important Seattle neighborhoods.

ALTERNATIVES TO STUDY IN THE EIS

We recognize the pressure Sound Transit is under to deliver on ST3 quickly. Promises made to voters obligate the agency to deliver faster than past light rail projects. This pressure appears to be driving a desire to narrow the alternatives to study in the EIS.

However, we believe that unduly narrowing the alternatives to be studied risks having the opposite of the desired effect; it would create a legally inadequate EIS, and risk causing several years of delay if the EIS were ultimately challenged and had to be redone. The heart of an EIS is its comparison of alternatives, its identification of the significant adverse impacts of various alternatives, and its identification of potential means of mitigating the adverse impacts of a proposal. When an EIS fails to examine potential alternatives, the primary purpose of the EIS is defeated. Sound Transit will get the West Seattle/Ballard Link finished and in service fastest if it prepares a thorough EIS now. A thorough EIS is one which studies a full range of reasonable alternatives and identifies the trade-offs and benefits of one alternative over another, as well as the means to mitigate the adverse impacts of the alternative that is ultimately chosen.

The region has recent experience with transportation planners insisting on unduly restricting the alternatives they considered in environmental documents. For years we were told that there were only two alternatives for replacement of the aging Alaskan Way Viaduct: a cut and cover tunnel or rebuilding the viaduct as a larger, more obtrusive version of itself. The first would have destroyed the historic piers along Seattle's Central Waterfront; the second would have perpetuated an historic land use tragedy for decades. Only after citizens insisted that neither of these alternatives were acceptable, eventually leading to a formal "no-no" vote, did planners seriously consider other alternatives. This led to a recognition that a third alternative—the deep bore tunnel now open to traffic—was the preferred alternative. The years of transportation planners insisting that there were only two alternatives and not looking further delayed the completion of the viaduct replacement for years, and resulted in tens or hundreds of millions of dollars of wasted design work. With that recent history, transportation planners are simply not credible if they declare that there is only one alternative that is viable and can be considered.

Under the best of circumstances, the West Seattle/Ballard Link project will be a massive project with massive impacts on the communities it affects.² HSD is concerned about the effects of any alternative—both during construction and in the long-term—on the many minority, linguistically-isolated, low-income, homeless, and elderly community members in Pioneer Square and the Chinatown-International District. Because the West Seattle/Ballard Link project will have substantial and lasting impacts on Pioneer Square and the Chinatown-International District and there is not yet enough information to understand and compare the potential impacts of different construction methods and alignments, we believe it is premature to study only one preferred alternative in the EIS. Doing so would make the EIS inadequate from its inception.

We also need to emphasize—we are a community organization of primarily volunteers, whereas Sound Transit is a multi-million-dollar organization staffed with engineers and planners. We expect Sound Transit to use its far greater resources to actively engage the affected communities as it identifies alternatives, the adverse impacts of each alternative, and potential mitigation for those impacts. We will be happy to work with Sound Transit to the extent we can in providing information about our communities and feedback on its work. But we cannot do the work for Sound Transit.

Based on information available to date, we believe the following options must be studied in the EIS, in addition to alternatives that Sound Transit might initially prefer:

² *Quite apart from the disruption from the current major public and private projects that are affecting Pioneer Square and Chinatown-International District, the long-term effects of which cannot yet be predicted, Seattle has experience with the impacts of the construction of the Third Avenue Bus Tunnel in the 1980s. That construction contributed to, if not caused, the demise of one of Seattle's three department stores that anchored Seattle's retail core, Frederick & Nelson, as well as numerous smaller retailers, and created a dead zone along Third Avenue for more than a decade, eliminating the small retailers that had created street life and public safety, and replacing that formerly healthy urban ecosystem with some of the highest crime areas of downtown Seattle. The potential adverse impacts of construction of the West Seattle/Ballard Link must be analyzed based on Seattle's actual experience with similar projects.*

- Sound Transit must study a Fourth Avenue alignment in the EIS. Sounder, Amtrak, Streetcar, and existing light rail service converge at Fourth Avenue and S. Jackson Street. Because of this, HSD believes the Fourth Avenue alignment appears to be better positioned to meet our objectives of improving connectivity between the Pioneer Square and Chinatown-International District neighborhoods, and better connecting both to the region as a whole, by leveraging the opportunities that come with serving as a regional transportation hub.³
- As there is not yet enough detail to compare the impacts of construction methods, Sound Transit must study the following options for the West Seattle/Ballard Link alignment through the Pioneer Square and Chinatown-International Districts:
 - Cut-and-cover tunnel versus bored tunnel (tunnel construction)
 - Cut-and-cover station versus mined station (Chinatown-International District/Pioneer Square station)
- We also ask Sound Transit to evaluate multiple construction delivery methods—including new integrated delivery approaches—in the interest of expediting project delivery and minimizing impacts to the Pioneer Square and Chinatown-International District.
- Considering the best information currently available, HSD and the stakeholder signatories below are not able to support a Fifth Avenue alignment as the preferred alternative. Based on the information provided to date, we have serious concerns about the potential construction impacts of the Fifth Avenue alignment. As with each alternative, we have questions about the number of businesses and residents who would be displaced during construction and the potential impacts of construction on community members' access to health and human services, community resources, and small and minority-owned businesses. We also have questions about whether there is any mitigation that would be effective in meaningfully addressing these impacts. Until those questions are addressed, and the impacts of the alternatives are compared, it is premature to identify the Fifth Avenue alignment as being "preferred."
- Finally, there is a question of whether the "ST3 Representative Alignment" is a reasonable alternative that must be studied in the EIS. According to Sound Transit's Level 3 Alternative screening process, the ST Representative Alignment does not perform well against the level 3 screening criteria. While we have not encountered much public support for this alternative, we encourage Sound Transit to study all reasonable alternatives for this project. If Sound Transit chooses not to study the ST3 Representative Alignment in the EIS, it may be better to study another reasonable alternative yet to be determined.

SCOPE OF THE EIS

HSD requests the EIS include the following analyses:

Acquisitions, Displacements, and Relocations

According to the 2035 Seattle Growth and Equity report, the Chinatown-International District is at high risk for displacement of low-income, minority and vulnerable populations

³ The Jackson Hub Project Concept Report, currently in draft form but due to be finalized in early spring 2019, articulates these objectives. Attachment A includes a link to this and other land use studies and plans.

(<https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/SeattlesComprehensivePlan/FinalGrowthandEquityAnalysis.pdf>). The West Seattle/Ballard Link project could accelerate the rate of displacement during and after construction of the project. The EIS must analyze the impact of the Project on the displacement of low-income, minority and vulnerable populations during construction and in once the project is in operation, and identify mitigation for that impact. If in 2052—a decade after the design date of 2042—West Seattle and Ballard residents are enjoying routine and efficient light rail service to downtown but low-income, immigrant residents of Chinatown-International District cannot afford to shop or find access to needed services in their neighborhood and small, family-owned businesses have been forced out of a gentrifying community, the Project cannot be labeled a success.

Construction Impacts

Some public construction projects are simply one of the hassles of living in a progressive community that must be endured. But projects such as the West Seattle/Ballard Link are so fundamentally different in scale as to be different in kind. Significant impacts on Pioneer Square and the Chinatown-International District from the West Seattle/Ballard Link project are likely to arise from the construction process, and those impacts and potential mitigation require in-depth study. The impacts from construction on transportation, parking, noise, vibration, access to public and health services, and public safety can literally be matters of life and death for residents and businesses during construction. Adequate mitigation of construction impacts is also essential, and to be adequate, the EIS must identify the specifics of mitigation to be provided and the systems that will be put in place to monitor the effectiveness of the mitigation as construction proceeds. Sound Transit will need to provide adjustments if monitoring shows particular mitigation to be inadequate or ineffective. There are several neighborhoods in Seattle (The Historic Waterfront, Pioneer Square, and Pike Place Market, to name a few) who have recent experience with the highly disruptive Alaskan Way Viaduct and Elliott Bay Seawall Replacement Projects, the First Hill Streetcar construction, and the replacement of the First Avenue water main, where it was demonstrated that with adequate mitigation, construction impacts may not be fatal to the vibrant street experience that is the foundation for our neighborhoods' success. One specific example was the funding of parking assistance, including reduced-cost short term parking in area garages and programs to inform visitors where parking is available, commitments (which must be kept) to cease construction during critical visitor periods, and funding of community information personnel, so that there is a direct line of communication between the project and the community and so that businesses and residents get as much warning of disruption as possible and know how to communicate back to the project management. If at the completion of the West Seattle/Ballard Link, residents of West Seattle and Ballard have effective public transit to downtown but Seattle's Historic South Downtown is marked by "Space Available" signs in most windows, vacant housing units, and its most vulnerable populations have been forced out, the Project cannot be labeled a success.

It is also critical that the EIS consider the cumulative construction impacts of other public projects that take place before, during, or after the West Seattle/Ballard Link. These include:

- The 4th Avenue Viaduct replacement, which SDOT has indicated will need to be replaced in the foreseeable future
- Alaskan Way viaduct replacement
- Elliott Bay seawall replacement
- Waterfront Seattle program
- Washington State Ferry Terminal expansion
- Seattle Streetcar construction
- Convention Center expansion
- Rebuilding of I-5 (which divides Chinatown and Japantown from Little Saigon)
- Nearly any upgrade to the City's water, sewer and electric infrastructure (Chinatown-International District and Pioneer Square are situated along Seattle's urban "waistline"—where the land narrows between Lake Washington and Elliot Bay – so the infrastructure runs through our area)
- Development of a new Cruise Ship terminal by the Port of Seattle

Piling one disruptive mega project onto another project magnifies the impact of all of them. Cumulative impacts in south downtown bear serious consequences that must be thoroughly evaluated. The EIS must identify such cumulative projects and identify mitigation that is equal to the cumulative impact.

Land Use

Pioneer Square and Chinatown-International District seek to advance two potentially competing objectives: promote and enhance transit-oriented development and minimize displacement of the kinds of small businesses affordable housing that exist in the neighborhoods today. As a potential major disruptive force in our community, the EIS should discuss how the Project's construction and operational impacts will affect each of these objectives and should identify mitigation of any adverse impacts.

Pioneer Square and the Chinatown-International District have undertaken a number of land use studies and planning exercises to clarify our priorities and guide future community development. Attachment A includes links to all of these studies and plans. Key land use policies that the West Seattle/Ballard Link project will most likely impact, and which need to be addressed in the EIS are:

- The Chinatown-International District has the highest public transit ridership of any Seattle neighborhood. Creating and enhancing a vibrant pedestrian environment, public gathering spaces, and transportation connectivity between Union Station and King Street Station are stated priorities for our communities (see the draft Jackson Hub Concept Design Report, <http://allianceforpioneersquare.org/what-we-do/public-realm/parkgatewaysproject/>). Any option for the West Seattle/Ballard Link alignment through the

Chinatown-International District must address this priority, incorporate elements of successful transit hub models, and avoid the mistakes of unsuccessful or struggling transit hubs. The EIS should specifically discuss mistakes that have been made with respect to the street environment associated with the Third Avenue bus tunnel and explain how such mistakes will be avoided here.

- Transit-oriented development that provides affordable small-business spaces, affordable housing, and sustains businesses that meet the needs of a lower-income, immigrant community—including opportunities in and around Union Station—are another stated priority for our communities (see draft Jackson Hub plan, *supra*). At recent public workshops held on July 31, 2018 and March 13, 2019, neighborhood residents and representatives specifically expressed a desire to study options that would revitalize Union Station as a transit station. As such, any option for the West Seattle/Ballard Link alignment should enhance, rather than preclude opportunities for transit-oriented development in Pioneer Square and the Chinatown-International District.

In addition, the land use plans and policies support the following goals and objectives, which the EIS must disclose any positive or negative impact on:

- Support the emergence of a significant residential community in Pioneer Square and Chinatown-International District, particularly for market-rate and affordable workforce housing. (South Downtown Executive Recommendations)
- Encourage employment density near the South Downtown transit hub, where King Street Station and Union Station are located. (South Downtown Executive Recommendations, Jackson Hub Project Concept Report)
- Maximize the benefit of activities related to the presence of the Office of Arts and Culture and the Office of Economic Development on the plaza level of the future King Street Station. (South Jackson Street Connections Final Report)
- Enhance public safety and opportunities for social connections, accessibility, and physical activity with environmental design improvements, including street and sidewalk improvements that are healthful, biophilic, and regenerative. (Seattle Chinatown-International District 2020 Healthy Community Action Plan)
- Pioneer Square and the Chinatown-International District are historic and iconic neighborhoods worthy of preservation. West Seattle/Ballard Link design elements should comply with existing neighborhood plans, policies, and guidelines developed to protect the history and culture of these neighborhoods.
- The Chinatown-International District is home to the largest population of elderly and non-English speaking residents in Seattle. The West Seattle/Ballard Link project should include context-sensitive design elements that address neighborhood demographic characteristics.

The Seattle 2035 Comprehensive Plan establishes the following “quality of life” objectives of particular importance to Pioneer Square and Chinatown-International District, which the EIS should recognize and for which it should identify any adverse impacts and potential mitigation:

- Preserve and enhance important public views within the Chinatown-International District and Pioneer Square neighborhoods.
- Establish more high-quality pedestrian-oriented street environments in the project area.
- Reinforce the vitality and special character of the Pioneer Square and Chinatown-International District's many parts.
- Preserve important historic buildings to provide a tangible link to the past.
- Ensure and enhance light and air at street-level and in public parks.
- Enhance the relationship of Downtown to its spectacular setting of water, hills, and mountains.
- Create new parks and open spaces at strategic locations.
- Adequately mitigate impacts of potential redevelopment on the quality of the physical environment.

The project purpose and need statement includes the following purpose: "Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development and multimodal integration in a manner that is consistent with local land use plans and policies..." We request that Sound Transit work collaboratively with City of Seattle to ensure that the design of station elements and the surrounding public realm will support current and future land use plans and policies that promote neighborhood preservation and development. We also request that Sound Transit include members of the public in those conversations, to ensure that community interests are represented in the agency conversations to shape the look and feel and future use in our neighborhoods.

Social and Environmental Justice

The nature of the vulnerable populations within Pioneer Square and Chinatown-International District are an essential part of the nature of the affected environment. The EIS should provide the analysis of social and environmental justice impact necessary for federal funding review.

The EIS will need to evaluate the impacts of construction and operation of all project alternatives on social resources in Pioneer Square and the Chinatown-International District. These social resources include: community cohesion, access to community services and resources, and access to community gathering places. The EIS will need to evaluate the impacts of project alternatives on special populations in our neighborhoods, including linguistically-isolated households and seniors. The EIS will also need to evaluate the impacts of project alternatives on environmental justice populations, including resources and institutions of particular importance to our neighborhoods' minority, low-income, and homeless community members. Finally, the EIS will need to make a determination of whether project alternatives have a disproportionately high and adverse impact on environmental justice populations.

In light of the existing health-related challenges our community members face, and recognizing that the substantial scope and scale of this project and related construction impacts, HSD requests that Sound Transit conduct a Health Impact Assessment to determine the potential effects of project alternatives on the health of populations

in Pioneer Square and the Chinatown-International District, especially vulnerable populations (low-income, homeless, senior, and minority community members). HSD and our partners encourage Sound Transit to use a broad definition of health to include pollution (air, water, vibration, and noise), physical activity, accidents and collisions, social resources, and economics, and identify opportunities to enhance health benefits while minimizing negative health outcomes.

Finally, the West Seattle/Ballard Link project will affect the economic environment in the Chinatown-International District and Pioneer Square neighborhoods. (Note that we disagree with Sound Transit and the City of Seattle's decision not to include Pioneer Square in its Race and Equity Toolkit evaluation of Level 1 and Level 2 alternatives, given the neighborhood's substantial homeless population.) We urge Sound Transit to apply a racial equity lens to the analysis of the project's likely economic impacts for both neighborhoods. We ask Sound Transit to place particular emphasis on evaluating and mitigating for the potential adverse effects of construction and operation on existing and future small and minority-owned businesses, many of which have provided a way for immigrant families to establish their economic sustainability.

Public Services and Utilities

Access to public services and first responders such as police, fire, medical emergency care, transit, schools, and human services is essential, especially given the number of homeless and elderly people living in these neighborhoods. These include human services located in Pioneer Square and the Chinatown-International District—including (but not limited to) International Community Health Services (ICHS), the Chief Seattle Club, Seattle's Union Gospel Mission Men's Shelter, Downtown Emergency Services Center, Compass Housing Alliance, Chinese Information and Service Center—and those located outside of these neighborhoods that serve residents of these communities, including (but not limited to) Lowell and Bailey Gatzert Elementary Schools, Meany Middle School, and Garfield High School.

Disruption to utility services such as water, sewer, and electricity adversely impacts all residents, but especially low-income and vulnerable populations who many not have alternative places to stay during service disruptions.

The EIS will need to evaluate the impacts of construction and operation of all project alternatives on access to public services and local utilities, identify potential disruptions, and mitigate for these disruptions.

Public Safety and Security

Public safety is a serious concern for our community members. According to a 2017 survey of residents and businesses in the Chinatown-International District, nearly 40 percent of respondents reported feeling the Chinatown-International District is not a safe place to live and/or work. (Seattle Chinatown International District Preservation and Development Authority and Interim Community Development Association, <http://idea-space.info/wp-content/uploads/2016/05/CID-Survey-Report-061117-002.pdf>).

There has been an enduring commitment by community organizations, business owners, and residents in both neighborhoods to improve public safety. For example, in 2015-16, a Task Force of twenty individuals representing Chinatown-International District resident advocates, businesses, property owners, and community development, service, and cultural organizations plus representatives from the Mayor's Office and Seattle Police Department developed recommendations to help the City of Seattle address public safety and other "entrenched issues that have plagued the neighborhood for several decades." Subsequently, the Task Force reconvened as a Public Safety Council to hold the City and community accountable for implementing recommendations emerging from the Task Force.

Unfortunately, despite our hard work and steadfastness, criminal activity persists in our communities. According to data provided by the Seattle Police Department and the Washington Office of Financial Management, the Chinatown-International District ranks third and Pioneer Square ranks fourth out of 57 neighborhoods in Seattle for highest crime rates. (Seattle Police Department and Washington Office of Financial Management, <https://www.seattletimes.com/seattle-news/data/crime-rates-down-in-most-seattle-neighborhoods-but-theres-a-big-divide-between-north-and-south/>).

The EIS needs to evaluate how construction and operation of each alternative would impact public safety and security in Pioneer Square and the Chinatown-International District. Substantial disruption from construction associated with the West Seattle/Ballard project could threaten our hard work to improve public safety. Considerations such as lighting and visibility, access for first responders, and minimizing unsecured construction areas are essential to ensuring the Project does not exacerbate our communities existing challenges with public safety and security.

Noise and Vibration

The Chinatown-International District and Pioneer Square neighborhoods include important cultural resources vulnerable to increases in noise and vibration. The Wing Luke Museum, for example, has art, artifacts, and installations that are sensitive to vibrations, and whose building has suffered from structural and other deterioration from transportation and utility projects like the streetcar.

In addition, there are nearly 170 unreinforced masonry buildings in Pioneer Square and the Chinatown-International District, according to the most recent documentation by the Seattle Department of Construction and Inspections (<http://www.seattle.gov/Documents/Departments/SDCI/Codes/ChangesToCodes/UnreinforcedMasonry/ConfirmURMList.pdf>). Unreinforced masonry buildings are more vulnerable to damage from construction-related vibration than other buildings.

We request that Sound Transit explicitly include what we have learned about vibration effects during other area projects to date, and study the effects of construction and operational noise and vibration to these resources and other project area buildings.

Geology and Soils

As we have learned with other area projects (downtown bus tunnel, new SR 99 tunnel, ongoing and burdensome utility work throughout the neighborhoods), the West Seattle/Ballard Link project tunnel and station alternatives in the Chinatown-International District and Pioneer Square neighborhoods would have substantial effects on geology and soils resources within the neighborhoods. Tunnel boring options could have significant effects on soil stability in the project area, and could result in damage to historic resources as well as new investments in and around the project area. We request a thorough investigation of impacts on geology and soils resources to better assess the hazards and effects on neighborhood landscape, buildings, and potential future impacts to seismic stability in and around the project area.

Historic and Archeological Resources (related to Section 106)

As described in the Jackson Hub Project Concept report, Seattle's iconic transportation landmarks Union Station (1910) and King Street Station (1906) define a still active transportation hub at the south end of downtown. These stations fall within the Pioneer Square Historic District and Chinatown-International Historic District and will be directly affected by the West Seattle/Ballard project. Construction of the Project may also affect numerous other landmark buildings within the two historic districts, as well as affecting the human scale and economic viability of the districts, which is essential to maintaining their historic character. The EIS must provide a full accounting of the historic and archeologic resources in both historic districts, study the effects of the project on each of these resources and districts, and make a determination about adverse effects to the resources. For adverse effects identified, the EIS must disclose potential mitigation opportunities to offset those effects.

It is a clear goal of both neighborhoods to maintain vibrant, living communities within each district. Given the fragile nature of the cultural threads that serve as the underpinning to the historic resources in the Chinatown-International District, the EIS should seek to disclose mitigation for impacts that do not render preservation efforts that result in a "museum of what was" in the neighborhood. Historic markers are not sufficient mitigation. Mitigation identified for the West Seattle/Ballard Link project should reinforce and provide investments toward the cultural elements within the neighborhood that support the overall historic character and integrity.

The West Seattle/Ballard Link Extension project will require compliance with Section 106 of the National Historic Preservation Act. We request that Historic South Downtown be a consulting party to the Section 106 process.

Parks and Recreational Resources

Community gathering spaces are an important part of the Chinatown-International District and Pioneer Square community fabric. Hing Hay Park is located one block east of the Fifth Avenue alternative alignment, and would be subject to serious disruption during construction of the project. The Donnie Chin International Children's Park is two blocks farther away. The EIS must do a thorough review of the parks, recreational resources, and other public spaces in the Chinatown-International District and Pioneer Square neighborhoods, and study the construction and

operational impacts to these resources. Where impacts are unavoidable, the EIS should disclose possible mitigation opportunities that seek to enhance existing and create new public gathering spaces directly in the neighborhood, and potentially within the project footprint.

Transportation

Transportation and parking impacts are one of the most obvious significant adverse impact of the construction process and must be fully analyzed in the EIS. But the EIS should also address the transportation impacts of the completed design. Will it be harder or easier for people coming from Ballard or West Seattle to get to Pioneer Square or Chinatown-International District if the new tunnel has only a station on Madison Street? How will people with mobility impairments be affected? What will the impact be on bus traffic, transit routes, and stops through the neighborhoods? What will the impact on scarce parking be, and how will those impacts affect local small businesses and their access to customers and deliveries?

We have heard throughout the screening process that any alternative will displace buses from the E3 busway through SODO. We request a thorough analysis of where those buses would be routed during construction and once the project is complete. Pioneer Square is currently experiencing the effects of increased bus traffic through the neighborhood along First Avenue due to Viaduct demolition, and through Waterfront construction, and is experiencing the dramatic effects that bus volumes have on the integrity of the public realm (eroded pedestrian environment), as well as wear and tear and direct damage to underground resources such as areaways. The EIS must analyze the effects of bus diversion through the neighborhoods during construction and operation of the project. It should also disclose the cumulative effects of those diversions before and during the project.

The volume of people moving to and through the neighborhoods will have an indelible effect on the fabric of the communities, offering both a threat and opportunity. The EIS must include a thorough analysis of the expected ridership of the West Seattle/Ballard Link project and the total ridership expected to travel to and through the Historic South Downtown station, including the number of people traveling from the new West Seattle/Ballard link to other modes of transit in the neighborhoods: bus, existing light rail, Sounder, Amtrak, Streetcar, ferries. The EIS should provide models of anticipated transit rider movements through the neighborhoods and be explicit about the assumptions used to build those models. HSD requests that Sound Transit engage the community about the assumptions they will use to build their transportation models and provide opportunity for the public to inform the analysis.

PUBLIC INVOLVEMENT

We appreciate the effort Sound Transit has made to engage key stakeholders and members of the public in pre-scoping and alternatives analysis. One ongoing concern is that some residents and businesses in Pioneer Square and Chinatown-International District have not yet had a meaningful opportunity to engage. Language and other barriers—including discomfort engaging with government because of the current political climate and/or

trauma associated with engaging with government in their countries of origin—create challenges to engaging our community members with traditional public outreach methods. However, these challenges are not insurmountable.

We urge Sound Transit to recognize that overcoming these barriers takes time and resources. It means meeting our community members where they are, instead of expecting them to come to us, or to you. We respectfully request that Sound Transit employ tactics that work for our community members, including:

- Review all printed and online materials to ensure they provide a basic project overview and avoid jargon so that newcomers to the project can understand.
- Continue and expand Sound Transit participation in existing community meetings by asking to send project representatives to the “CID Forum”—a monthly community meeting on neighborhood issues and concerns run by InterimCID, scheduled meetings of the Pioneer Square Resident’s Council, and other community meetings.
- Continue and expand participation in community events, such as the Night Market run by the Chinatown-International District Business Improvement Area and the Lunar New year celebration.
- Hold outreach events outside Union Station during rush hour.
- Staff at table at Hing Hay Park and Uwajimaya.
- Ask family association boards to share project information with members. (A family association is an organization formed by people who share a common ancestor or surname. In the Chinatown-International District, there are multiple family associations, including the Luke and Gee How Oak Tin Family Associations.)
- Attend community organization board meetings, particularly in Pioneer Square (the Downtown Emergency Services Center, Chief Seattle Club, Seattle Indian Health Board, Navigation Center, Friends of Little Saigon, etc.)
- Place translated outreach materials inside resident buildings.
- Offer multiple engagement opportunities including more online information for those who can’t attend meetings.
- Place material on the trains coming into and out of the International District Station, King Street Station, and on buses and bus stops that pass through the area.

Finally, we request that Sound Transit create opportunities for the Chinatown-International District and Pioneer Square neighborhoods to inform design prior to draft EIS publication. Continuing and expanding outreach efforts during the development of the draft EIS will improve the likelihood of bringing the residents, businesses, and other community members along in the process. We believe this will help the project stay on schedule and deliver value and opportunity for all transit users and community members in 2035 and 2135.

Hello,

Below, please see the Northwest Seattle Coalition's comments regarding the West Seattle and Ballard Link Extensions EIS scoping period, specifically regarding Sound Transit 3 Link Light Rail Extension Ballard to Downtown corridor.

The Northwest Seattle Coalition formed in early 2016 and is composed of business, industry and neighborhood organizations from Seattle's neighborhoods, generally located within King County Council District 4.

Our comments on the EIS Scoping for the Ballard to Downtown corridor of Link Light Rail Extension follow:

Specific Routing topics of study:

- Study the Level 3 “Brown Line” from the tunnel portal west of Elliot Avenue to a surface station at Galer Street, continuing the “Brown Line” on the surface to the south end of the Interbay Athletic Complex Ballfields and then following the Level 3 “Blue Line” from the Interbay Athletic Complex Ballfields on the surface under Dravus Street to a surface station in Interbay located at Dravus Street west of 17th Ave W, from there continue into a tunnel under 14th Ave W to an underground station located at least as far west as 15th Ave NW and Market Street in Ballard.
- Also study an underground station further west at 17th Ave NW and Market Street in Ballard.

Transit Ridership topics of study:

- Maximize reliability of future transit commutes:
 - Do not allow low and lower reliability features subject to failure during the useful life of the project, especially drawbridges.
- Minimize future transit-rider commute times:
 - Consider total future transit rider commute times with respect to the following negative impacts: drawbridge failures, and transfer penalties associated with bus-rail integration including: minimizing bus turning movement requirements to drop off passengers at the Interbay Station, bus platform locations nearest to station entrances, and rail platform locations to reduce transit rider transfer walk time.

Environmental topics of study:

- Acquisitions, Displacements and Relocations
 - Consider maritime displacements in Salmon Bay and the operations of extremely hard to relocate maritime industry in Salmon Bay.
- Economics
 - Consider the long-term negative economic impacts of both increased operating expenses to maintain and negative effects on surrounding commerce of drawbridge failures, similar to the Ballard Bridge failures we currently experience.
 - Consider permanent negative economic impact of Representative Alignment vis-à-vis freight, maritime vessel, vehicle, and transit movement through Interbay, specifically on Elliot and 15th Avenues and at Fisherman’s Terminal.

- Consider significant negative economic impact of construction of Representative Alignment vis-à-vis freight, maritime vessel, vehicle, and transit movement through Interbay, specifically on Elliot and 15th Avenues and at Fisherman's Terminal and Salmon Bay.
 - Consider the positive economic effects of increased access associated with future expansion per the Sound Transit Long Range Plan to both the north and east from a Ballard Station location
- Environmental Justice
 - Consider transit users from Interbay and east Magnolia who are living in naturally affordable housing as transit users who may otherwise have to drive to work or school.
- Land Use
 - Consider current land use in Ballard and total activity in Ballard Urban Village. Consider how to locate the Ballard Station as close as possible to those residential units and commercial activity locations while minimizing other impacts.
 - Consider TOD potential in Interbay, including: East Magnolia and West Queen Anne.
 - Measure walk-, bicycle- and transit-shed in detail using actual sidewalk infrastructure, planned bicycle infrastructure, and Long Range Plan for King County Metro Transit including potential bus circulator connections for central and west Magnolia and Seattle Pacific University. Please do not use crow flight radiuses to measure walk-shed, please include slope steepness and total travel time in walk-shed analysis.
 - Please include all 2040 Metro Connects Long Range Plan Magnolia bus routes as potential ridership boosting connections to land use in Magnolia.
 - Consider the future redevelopment and potential increased population and ridership from the Interbay National Guard Armory site.
 - Consider the Port of Seattle's planned industrial land use development on the north and east sides of the Port's Terminal 91 complex.
- Noise and Vibration
 - Consider the current noise and vibration of the BNSF freight yard and the relatively lower impact of locating the light rail infrastructure near that rail yard.
- Parks and Recreational Resources
 - Consider how to integrate the Interbay park facilities in future plans
 - Consider how to minimize impacts to Interbay P-Patch facilities
- Public Services, Safety and Security
 - Consider how to reinforce the Dravus Street overpass of BNSF, specifically for non-motorized and transit and emergency vehicle access to serve emergency access point needs to the Magnolia neighborhood.
 - We recently saw mobility reduced due to snow. We expect mobility to be reduced in the event of the Magnolia Bridge failing. Light rail is likely to operate normal regular service. Please consider the Interbay station location and station access (from Magnolia across the BNSF railroad) improvements as vital safety improvements for the neighborhood.
- Transportation (traffic, freight, navigation, transit, non-motorized)
 - Please consider the negative impact both permanently and especially during construction of the Representative Alignment on all vehicle and vessel movement in Interbay and Salmon Bay.
 - Please consider how to locate the Interbay Station closer to Dravus Street for better bus-rail transit integration to reduce commute times for future transit riders.
 - Please consider how best to integrate Magnolia and Seattle Pacific University bus routes in King County Metro Connects 2040 Long Range Plan with the Interbay light rail station.
 - Utilize current and improve existing pedestrian and bicycle infrastructure connections to Smith Cove and Interbay station locations.
 - Study additional walking, bicycle, and bus transit connections between Interbay and Seattle Pacific University and their positive impacts.
 - Ensure design of Link Extension integrates with current Magnolia Bridge and future Magnolia Bridge Replacement.
 - Consider the future redevelopment and potential increased population and ridership from the Interbay National Guard Armory site: consider added walking and micro-mobility connections between Smith Cove and Interbay stations that would allow access to Armory site and Whole Foods.

- Visual and Aesthetics
 - Consider the current aesthetics of the BNSF freight yard and the relatively lower impact of locating the light rail infrastructure near that rail yard.
- Water Resources
 - Consider the impacts of construction of above ground Ship Canal crossings on salmon habitat and migration in Salmon Bay.

On behalf of the Northwest Seattle Coalition, thank you for all your work to expand our regional high capacity, rapid transit system,

Ben Broesamle
 Coordinator
 Northwest Seattle Coalition

The Northwest Seattle Coalition consists of the following organizations:

The Ballard Alliance as its predecessor organizations: the Ballard Chamber of Commerce and the Ballard Partnership for Smart Growth
 Central Ballard Resident’s Association
 The Coalition of Magnolia, Queen Anne, & Interbay
 Crown Hill Neighborhood Association
 Interbay Neighborhood Association
 Magnolia Chamber of Commerce
 Magnolia Community Council
 The Magnolia Trail Community
 North Seattle Industrial Association
 Queen Anne Chamber of Commerce
 Queen Anne Community Council
 Uptown Alliance
 West Woodland Neighborhood Association
 Whittier Heights Community Council



contact@nwseattlecoalition.org
[@NwSeaCoalition](#) | [Facebook](#)

Thank you for the opportunity to provide comments on the scope of the EIS. Historic South Downtown looks forward to continuing to develop a collaborative working relationship with Sound Transit to shape the West Seattle/Ballard Link project.

Sincerely,

Barry Blanton, Blanton Turner

Teresita Batayola, International Community Health Services

Lisa Howard, Alliance for Pioneer Square

Kathleen Barry Johnson, Historic South Downtown

Denise Moriguchi, Uwajimaya

Tomio Moriguchi

Savitha Pathi, SAG member, Trustee, Wing Luke Museum of the Asian Pacific American Experience

Beth Takekawa, Wing Luke Museum of the Asian Pacific American Experience

Maiko Winkler-Chin, SCIDpda

Larry Yok, Trustee, Wing Luke Museum of the Asian Pacific American Experience

Attachment A

The Pioneer Square and Chinatown-International District neighborhoods have engaged in multiple studies and community planning processes to define our priorities. The following are links to these studies and plans.

Neighborhood, municipal, and regional plans:

[Pioneer Square Streetscape Concept Plans](#)

[Pioneer Square Parks and Gateways Project](#)

[Pioneer Square 2020 Neighborhood Plan and Updates](#)

[Pioneer Square Active Streets Strategy Report](#)

[1998 Pioneer Square Neighborhood Plan](#)

[CID Public Safety Task Force Recommendations](#)

[2008 Economic Development Study \(CID OED\)](#)

[King Street Station Multimodal Hub Health Impact Assessment \(2011\)](#)

[Jackson Hub Project Concept Report](#)

[King Street Station/Union Station Square Concept Plan](#)

[Imagine Greater Downtown Big Ideas](#)

[Seattle Chinatown-International District 2020 Healthy Community Action Plan](#)

[Measuring Neighborhood Air Pollution \(nearby study\)](#)

[South Jackson Street Connections Final Report \(2016\)](#)

[Livable South Downtown Overview \(2009\)](#)

[Livable South Downtown Planning Study Executive Recommendations \(2009\)](#)

[Livable South Downtown Background Report \(2006\)](#)

[2017 Parks and Open Space Plan \(Seattle Parks and Recreation\)](#)

[Seattle 2035 Growth and Equity \(Seattle OPCD, 2016\)](#)

[Stadium District Concept Plan \(2012\)](#)

[Seattle 2035 Comprehensive Plan \(2015-2035\)](#)

Where appropriate, HSD requests Sound Transit adhere to the following neighborhood-specific design guidelines when developing the alternatives for the WSBLE project:

[International Special Review District Design Guidelines \(DON\)](#)

[Pioneer Square Prism Glass Design Manual](#)

[Pioneer Square Preservation District Guidelines](#)

The Magnolia Community Council's comments on the EIS Scoping for the Ballard to Downtown corridor of Link Light Rail Extension follow:

Specific Routing topics of study:

- Study the Level 3 "Brown Line" from the tunnel portal west of Elliott Avenue to a surface station at Galer Street, continuing the "Brown Line" on the surface to the south end of the Interbay Athletic Complex Ballfields and then following the Level 3 "Blue Line" from the Interbay Athletic Complex Ballfields on the surface under Dravus Street to a surface station in Interbay located at Dravus Street west of 17th Ave W, from there continue into a tunnel under 14th Ave W to an underground station located at least as far west as 15th Ave NW and Market Street in Ballard.
- Also study an underground station further west at 17th Ave NW and Market Street in Ballard.

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 - Consider significant negative economic impact of construction of Representative Alignment vis-à-vis freight, maritime vessel, vehicle, and transit movement through Interbay, specifically on Elliott and 15th Avenues and at Fisherman's Terminal and Salmon Bay.

- Consider the positive economic effects of increased access associated with future expansion per the Sound Transit Long Range Plan to both the north and east from a Ballard Station location
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 - Consider how to minimize impacts to Interbay P-Patch facilities
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 - Consider how to reinforce the Dravus Street overpass of BNSF, specifically for non-motorized and transit and emergency vehicle access to serve emergency access point needs to the Magnolia neighborhood.
 - We recently saw mobility reduced due to snow. We expect mobility to be reduced in the event of the Magnolia Bridge failing. Light rail is likely to operate normal regular service. Please consider the Interbay station location and station access (from Magnolia across the BNSF railroad) improvements as vital safety improvements for the neighborhood.
- Transportation (traffic, freight, navigation, transit, non-motorized)

- Please consider the negative impact both permanently and especially during construction of the Representative Alignment on all vehicle and vessel movement in Interbay and Salmon Bay.
- Please consider how to locate the Interbay Station closer to Dravus Street for better bus-rail transit integration to reduce commute times for future transit riders.
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 - Consider the current aesthetics of the BNSF freight yard and the relatively lower impact of locating the light rail infrastructure near that rail yard.
- Water Resources
 - Consider the impacts of construction of above ground Ship Canal crossings on salmon habitat and migration in Salmon Bay.

On behalf of the Magnolia Community Council, thank you for all your work to expand our regional high capacity, rapid transit system.



April 1, 2019

Submitted via email to: WSBscopingcomments@soundtransit.org

West Seattle and Ballard Link Extensions, c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Re: Scope of the EIS for West Seattle and Ballard Link Extensions Project

Dear Ms. Swift:

The Seattle Chinatown International District Preservation and Development Authority (SCIDpda) appreciate the opportunity to submit input on the scope of the environmental impact study for the West Seattle and Ballard Link Extensions project.

SCIDpda was created by the City of Seattle and the community in 1975 to work for the conservation and renewal of the unique cultural and ethnic integrities characteristic of the Chinatown-International District.

We were created to promote, assist and encourage the preservation and development of structures and open spaces in a manner that affords a continuing opportunity for local business and property owners, residents, community organizations, and visitors to carry on their traditional, as well as developing, activities. Our job includes encouraging programs to expand food retailing, especially the sale of ethnic products; to expand and preserve the residential community, especially for low-income people; to promote the survival and predominance of small shops, ethnic businesses and other enterprises, activities and services which are essential to the functioning and vitality of the Chinatown-International District.

We know our neighborhood well. We understand that our community has various viewpoints and opinions, and we try to represent the diversity of our stakeholders. We have staff who have participated in Sound Transit's Stakeholder Advisory Group process, as well as other transit planning discussions in the area, and spend time trying to understand these decisions, but do not claim any expertise in this work.

We see the work that Sound Transit is undertaking as a great opportunity as Union Station (adjacent to all alternatives) is the confluence of local and regional transit lines. This Project, rather than only focusing on solving its alignment issue, should take into consideration the potential for the 4th Ave viaduct upgrade/redevelopment and other major projects and their impacts on our community as it examines its alternatives.

We believe this is a great opportunity for Sound Transit, City of Seattle and King County Metro to work together to redevelop the Union Station area to a modern and effective transportation hub that could serve the region and beyond in the long-term - the 100 year vision - as this is a transformative project.

P 206.624.8929
F 206.467.6376

409 Maynard Ave S
Suite 200
Seattle, WA 98104

P.O. Box 3302
Seattle, WA 98114

www.SCIDpda.org



Alternatives to Study

SCIDpda does not believe that any of the alternatives being discussed at this time are ideal. It's prudent for planners, engineers and designers to study best practices at other places and come up with better alternatives that reduce construction costs and timeline and mitigates displacement risks. We fear making a decision now that could limit the best option for all of us in the future.

For this reason, we believe all alternatives need to be studied. If Sound Transit can eliminate the Representative Alignment with no legal risk, it should do so.

We understand Sound Transit is under pressure to deliver ST3 quickly and faster than past light rail projects, but faster is not always better - and if we are looking at what works best with a long term time vision in mind, the extra time may lead to the development of an alternative that meets our community's expectations. We ask Sound Transit to let the EIS process do what it is meant to do - compare alternatives identify impacts, and identify mitigation measures, so that the best alternatives come forward.

Vulnerable Community

It is clear that Sound Transit is keenly aware that our community is low income and a community of color. What has not been stated often, and needs to be examined in the EIS for alignment impacts on additional factors that make our neighborhood vulnerable, including:

- High concentration and number of seniors - close to 25% are 65 and older; most are on limited incomes
- High number of residents who do not speak English at home (over 50%)
- High percentage of residents who immigrated to the US who often do not understand public processes, or why our projects take as long as they do

Our businesses are also vulnerable. A high number are small family owned operations, with limited English skills and capital, and are often low income.

Construction Impacts

This neighborhood, because of its location between the central business district and industrial areas, has endured major construction projects. SCIDpda staff and board have been here during I-5 construction, the Kingdome, Union Station, and most recently the First Hill Streetcar. We experienced Sound Transit work in the Rainier Valley. That history causes us to be deeply concerned about construction, its impacts and potential mitigation, and we request in-depth study with mindful, culturally-competent perspective.

We expect adequate and fair mitigation of construction impacts. The EIS must identify detailed mitigation, and the systems that will be put in place to monitor the effectiveness of the mitigation as construction proceeds. Please consider recent experiences of major public projects in Seattle, and reflect on what worked and did not work in Link Light Rail Rainier Valley experience in the work with small businesses (both with Sound Transit and the City of Seattle), and City of Seattle's First Hill Streetcar. There are other ethnic enclaves that have endured similar projects that can also be used as "learning opportunities" or "best practices".

Disruption to utility services such as water, sewer, and electricity adversely impacts all residents, but especially low-income and vulnerable populations, or for impacted businesses. Careful scheduling,

timing, coordination, and communication is key to success, as we learned during the First Hill Streetcar project. The EIS will need to evaluate the impacts of construction and operation of all project alternatives on utilities, identify potential disruptions, and mitigate for these disruptions.

Keeping our businesses informed of construction impacts months in advance may not be intuitive, but is important. Some of our neighborhood businesses purchase goods months in advance in order to utilize shipping, or due to seasonality.

Other construction impacts that need to be included in the EIS:

- How will construction location and type impact our air quality? Our air quality is currently some of the worst in the Puget Sound Region as determined by the Puget Sound Clean Air Agency.
- How will the different alternatives impact accessibility for those who live, work, shop, and visit our neighborhood? We request the EIS examine this based on the general public, as well as those noted above in Vulnerable Community.
- We understand that the staging area is likely to be in the CID historic core, potentially near the Joe's Tavern site. What will the different alternatives' impacts be on the community? Our traffic in the neighborhood is difficult due to the confluence of our vulnerable community, drivers of both passenger and commercial vehicles cutting through the neighborhood, cyclists, transit, etc. What activities are anticipated at the staging area, how will that impact the surrounding area's accessibility and transportation flows, air quality, noise and vibration, and other considerations we have not considered?

Back to Back Projects

For the past 10 years our staff and board have been told that the 4th Avenue viaduct either needs to be rebuilt or that it is in good shape. To get clarity, we request the EIS examine 4th Avenue's condition because the cumulative impacts of ST3 and 4th Avenue rebuilt within close timing would potentially kill the Chinatown International District. Simply put, is there potential opportunity to resolve both issues with one project?

Station Area

There has been much community discussion as to what should happen at the station area for economic development. How will the community benefit from station area development? Who will manage, and can it be done in a way that complements – versus competes with – surrounding neighborhood businesses? These questions should be examined in this process.

We are intrigued by a vision of a revitalized Union Station. But, we feel that in order for it to function well, it would need to have something to draw people into the property, other than just commercial uses. Making it a functioning station, forcing people to enter it for access, would be an immense improvement, and a grand entrance into our city. The EIS should identify those key features to making it function well.

We also request that the station area have a location from which the public can purchase or obtain the different classifications of ORCA cards (e.g. youth, ORCA Lift, RRP), and to consistently have education materials in a variety of languages so new transit users can understand how to use the cards. We hear that there are concerns amongst immigrant populations about using the ORCA card program as they do not want to be cited and fined for not having "tapped in" correctly.

We request that Sound Transit work collaboratively with City of Seattle as it does station area planning - we need to ensure that station elements and the surrounding public realm promote neighborhood preservation and development.

Public Safety and Security

In a diverse community with a variety of opinions – one thing we generally can agree on is that we are all concerned with public safety. The EIS needs to evaluate how construction and operation of each alternative would impact public safety and security in Pioneer Square and the Chinatown-International District. Considerations such as lighting and visibility are essential.

Open Space

The Plaza to the east of Union Station - the area's above the existing light rail station - is not welcoming, does not reflect the culture of our communities, and is visually distracting. As part of the EIS and in discussions of open space, we request how the area is reimagined to become a world-class transportation hub reflective of our City.

Transportation

We cannot imagine what transportation will be like in the future. What happens with the E3 busway? What happens when Highway 99 starts tolling? The EIS should articulate its assumptions on transportation flows, and how the different alternatives impact and address challenges.

We still foresee a need for parking and for access to our community because our area is a regional draw, and even when Sound Transit is complete, those shoppers into the neighborhood who come from as far as Bellingham, Olympia and Yakima will still need to drive. As we often say, Grandma can't get a 50 pound bag of rice home on transit, and Amazon does not deliver her. The question for the EIS is how will the alignments impact parking, and access to businesses for both customers and business deliveries?

Public Involvement

We appreciate Sound Transit's efforts to engage our community. And you have to keep trying, it is an iterative process. The language is hard enough, but it is more than that - it is partly cultural. Some of our community may never participate as they may not have the time, energy, language, or the understanding of what is being asked of them – they may have never been asked before, or feel it is not their role, but you must keep trying.

Doing this work takes time, resources, and consistency. The work gets confusing for the community because in the community's mind, the agencies all fall into the bucket of "government".

We thank you for this opportunity and look forward to working with Sound Transit and other partners in making this one of the best transit centers in the world. It is one of the biggest in the Western US, and we have the exciting opportunity and an obligation to make it better for ourselves and for future generations.

Sincerely,

Jared Jonson, Board of Directors President
Maiko Winkler-Chin, Executive Director



Seattle Neighborhood Greenways

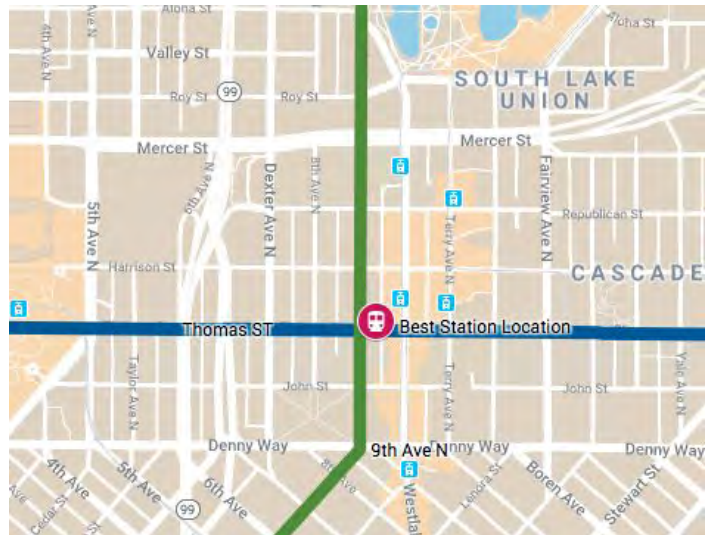
safe healthy streets for all SeattleGreenways.org @SNGreenways

Impact HUB Seattle 220 2nd Ave South #100 Seattle Washington 98104

Dear Sound Transit Board and Staff,

As Sound Transit considers the West Seattle and Ballard Link extensions route and station alternatives, **we encourage you to site the South Lake Union station location as close to the intersection of 9th Ave N and Thomas St as possible.**

This location would provide the best access north-south and east-west for people walking and biking. Thomas St, part of the Lake2Bay plan, is envisioned by the City of Seattle as the only east-west route for people of all ages and abilities biking in South Lake Union and will be the premier east-west walking and rolling street. 9th Ave N is planned to be the primary north-south biking route in South Lake Union, providing connections within the neighborhood and beyond to Westlake and Belltown.



Siting the station close to Thomas St and 9th Ave N will be the most accessible location for walking and biking in the neighborhood, ensuring a maximal walkshed and bikeshed.

The location is also compatible with transit transfers, being only feet away from the South Lake Union streetcar stop and rapid ride stops.

Thank you for your consideration,

Sincerely,

Gordon Padelford
Executive Director
Seattle Neighborhood Greenways

28 March 2019

Mail West Seattle and Ballard Link Extensions
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Dear Ms. Swift:

Thank you for the opportunity to provide input on the scope of the Environmental Impact Statement analysis for the proposed West Seattle and Ballard Link Extensions.

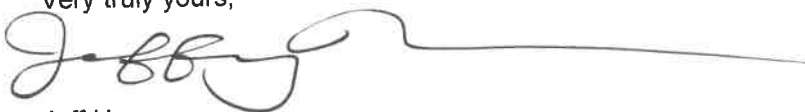
Seattle Repertory Theatre aspires to *put theatre at the center of public life*. From our building at Mercer and Warren we produce more than 300 performances per year and welcome more than 130,000 visitors from Seattle, the greater Puget Sound area, and beyond.

As we contemplate our own long-term planning to better align our facilities with our public mission, we see enormous opportunities in the proposed Ballard Link extension scenarios both north and south of us. Bringing people to the Seattle Center campus through the extension of light rail service is directly aligned with our desire to serve a broader community and better integrate with the emerging Uptown Arts and Cultural District. We strongly support transit efforts in this area and are eager to collaborate in planning this important civic project.

Of course, operating two performance halls with eight performances per week both day and night means we have special functional requirements to consider, as well as being a sensitive receptor for noise and vibration that may be associated with transit near our buildings. We would welcome the opportunity to share the details of our operations with your team during the EIS process, and look forward to working with you to analyze possible impacts during both construction and long-term operations.

What's more, working together to craft a long-term plan for transit and cultural development at either Republican Street or Mercer Street has the potential to generate sustained public and neighborhood value for decades to come. We look forward to talking with you and your team.

Very truly yours,



Jeff Herrmann
Managing Director



SEATTLE STREETCAR COALITION

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

April 1, 2019

Dear Ms. Swift,

The Seattle Streetcar Coalition (www.letsgostreetcar.org) represents a broad partnership of residents, nonprofits, businesses, arts, healthcare, educational and cultural institutions in neighborhoods spanning the length of the current line as well as neighborhoods to the north and south. We are committed to realizing a connected and robust streetcar network in Seattle.

We are strong proponents of multiple transit options as we realize that no single transportation solution can meet the travel demands of our rapidly growing city. In current planning, the Center City Connector (C3) Streetcar is the only high-capacity transit coming to Seattle prior to the completion of the West Seattle to Ballard Link Extensions (WSBLE) project. And come 2035, we are excited for meaningful, multi-modal connections for riders.

However, based on your present level of analysis, it appears that there are serious impacts to the Seattle Streetcar system that threaten its functionality for users during construction and could threaten the operations of the system as it recovers from ST3-related impacts. It's important to note that many of the present streetcar users are members of vulnerable populations along the First Hill line – including residents of Yesler Terrace, and elderly or low-income residents of Chinatown International District and Pioneer Square. Additionally, please consider that the First Hill streetcar was built as mitigation for Sound Transit failing to deliver a First Hill light rail stop. Now you threaten the very mitigation you proposed and funded.

We support ST3, a 100-year investment in transportation. However, its success cannot disrupt the vitality of another essential transportation mechanism. Sound Transit should study the impacts to the Seattle Streetcar as part of the transportation section of your Draft Environmental Impact Statement. Specifically, please:

- Study alternative construction methods that could either keep the Streetcar running or minimize disruption
- Study the impact on ridership to all segments of the system associated with truncating the lines at CID and Westlake
- Study potential options for re-routing, using shuttles, and other interim measures to provide streetcar riders with uninterrupted levels of service
- Include the impact of constructing the Ballard-Chinatown tunnel, station locations at Westlake and the Chinatown-International District, construction traffic, staging areas and any other incidental impacts that might interrupt the regular and reliable delivery of system-wide Streetcar service. Consider utilizing off-ROW, private and alternate properties for staging areas to avoid line disruptions. Consider other mitigation based on the impacts identified in the study.

- Study the ramifications of eliminating access to streetcar maintenance facilities and how that impacts the Center City Connector streetcar overall operability

Additionally, in evaluating environmental justice impacts, Sound Transit should study:

- Impacts to vulnerable populations along the First Hill and South Lake Union Streetcar alignments
- Loss of access to clean, predictable and efficient transportation in the communities served by the two existing lines and the future C3 streetcar

To eliminate the full connection that is being realized through C3 is unacceptable. The C3 establishes a linked streetcar system and will be complete in 2025 - around the time you will go to construction with WSBL. Anything Sound Transit does to threaten this system needs to be clearly articulated through the environmental process and with stakeholders that depend on the streetcar. Additionally, any mitigation costs to keep the Seattle Streetcar System running need to be assumed by Sound Transit.

Again, we support clean, efficient, high-capacity transit through a variety of means. But we cannot irreparably harm one mode in favor of another.

Regards,

Seattle Streetcar Coalition



To: Sound Transit Board and Planning Staff
Re: ST3 Level 2 Planning

Thank you for the opportunity to comment on ST3 level three planning in advance of your selection of the preferred alternative and backup options you will advance through the EIS process.

We're finally here: ST3 Planning [level 3](#) is where we cut everything but two options and send those on for an environmental impact study. At this point, our primary concern is with the low end options. We are concerned that high end options that require local funding will not be funded and we don't want to be left with backup plans that are less than optimal for riders.

In addition to our comments below we want to stress the importance of pedestrian access to stations. Making sure that stations are as easily accessible as possible needs more focus and study.

We also want to say again that Sound Transit should still be working to speed up the timeliness for project delivery if at all possible. That means making decisions that move the process forward instead of drawing dead end arguments out.

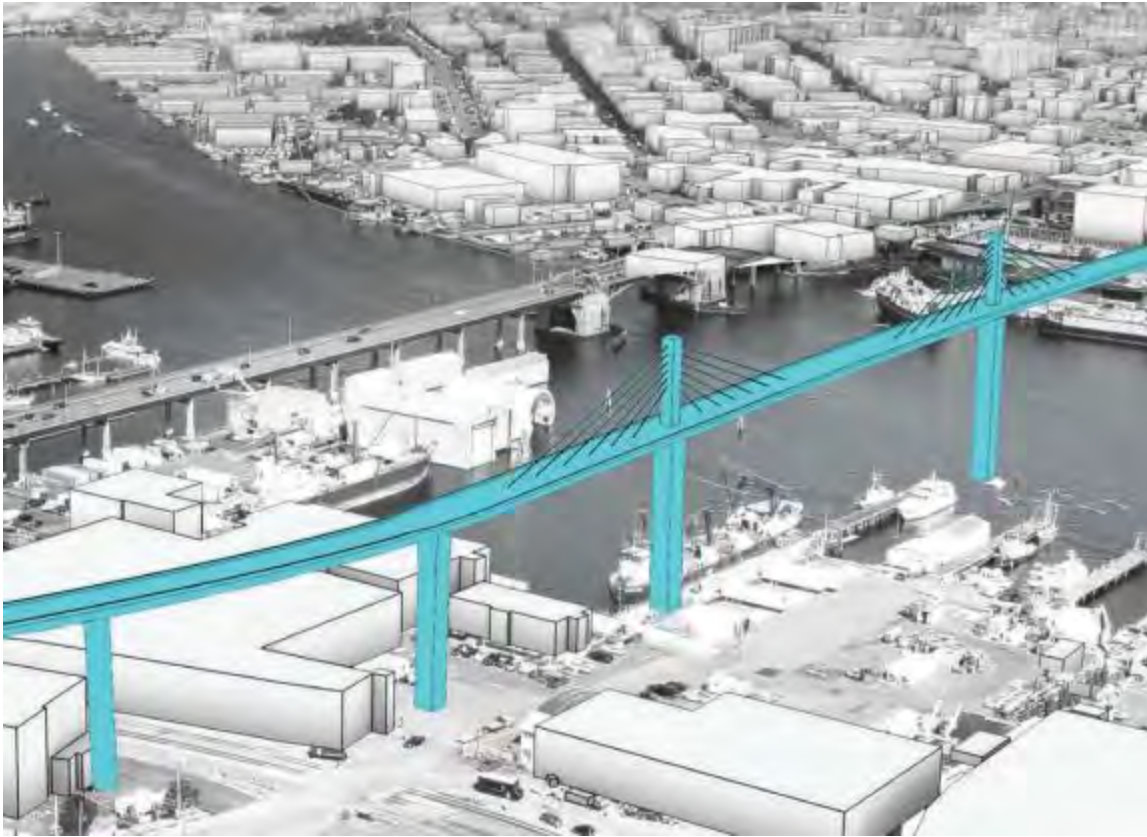
Right now we need to make sure the affordable options that we send through are acceptable in case additional local funding never comes. Building on our central concepts of [Reliability](#), [Expandability](#), and [Accessibility](#) along with our [Level 2 feedback](#) and [plea to put riders first](#), here is what we're focused on now by station:

Ballard

Though we've heard ST staff say many times that the options are mix and match, we don't get the impression they mean it when it comes to the Ballard station location. As we ([and others](#)) have said many times a 14th NW station and a drawbridge are both unacceptable. [A drawbridge is an unacceptable](#) reliability compromise for the future of our system. A station on 14th NW simply doesn't serve riders west of 15th or transfers well. A station on 15th NW with entrances on both sides of the street does.

A 14th high bridge crossing with a station on 15th is our minimal expectation for an affordable option. While it's not impossible to see local funding via the port come through for a tunnel to Ballard, as the current options stand, the 15th Ave NW tunnel station the only option we can support.

That said, the SAG and ELG have produced a short list of outcomes for Ballard that are mediocre at best. If we are looking at the best possible outcome for transit riders we should be looking to move the line into the center of the walkshed for Ballard similar to the [option on 20th](#) presented on Seattle Transit Blog.



Fixed bridge crossing at 14th

SoDo and the International District

This is a rare case where the best option is also the most affordable option and has the least schedule risk. Though a cut-and-cover station on 5th will have impacts it will serve transfers between the two Link tunnels far better than anything else on the table and preserve Ryerson bus base. This alignment also saves \$200m which conceivably could be used on key options elsewhere and to devise very good mitigation for ID businesses. Variations of this option should be included in both the high/low alternatives in the EIS.



West Seattle

We're highly skeptical of the value of spending \$700 million or more on a West Seattle tunnel that has no advantages for riders. We're particularly concerned that [local politicians are attempting to kill transit projects](#) in service of spending on this tunnel. The affordable/elevated option that makes it through to the next round should include a crossing to the south of the West Seattle Bridge to avoid conflicts with the port. The yellow line is an improvement on the representative alignment as it orients the Junction station north/south to ease future expansion. We would like to see multiple variations of affordable options make it through to the EIS instead of any tunnel options.

As an example, here is [an alternative](#) that we would like to see forward for elevated rail in West Seattle.



Midtown

In Midtown, we need to focus on connections to First Hill. Perhaps the best place for that is between Madison and Marion on 5th Avenue (the Blue Line) where east connections to Madison BRT are possible. For high/low variations at this station, we want to see station pedestrian access options considered. A pedestrian tunnel to 3rd or 7th could make a big difference for riders.



South Lake Union

A Harrison station is both affordable and the best for transit, bike, pedestrian connectivity. We would like to see variation of this alignment selected in both high and low cost alternatives.



Denny

A station mostly oriented south of Denny with an entrance north of denny (blue line) is the best option for the walkshed if we assume a Harrison SLU station. It should be included in both high and low cost alternatives.



Westlake

It was hard to tell what the tradeoffs are for Westlake Station from the [presented materials](#). The location of the future Westlake Station is all about transfers. The option that creates easier transfers and is better for the user experience of transit riders is what should be built. Multiple options that explore the best possible transfers for riders should be included in the EIS.

Seattle Center

At Seattle Center, we prefer direct access to Key Arena provided by a Republican Street Station and we also believe construction of a Station on Mercer would be another mess. Republican option should advance for both high/low options.

Smith Cove

A station that integrated with the Helix bridge made a lot of sense on its face, but the \$200M price tag is eye popping for not much of an upside. There are definitely reasons to like that option, but not for that price. The other option, the Brown Line station at Galer, also added \$100M over the representative alignment mostly due to a longer tunnel that extends under Elliott Avenue and allows the alignment to be mostly on the surface through Interbay, including the station at Galer St. Both Smith Cove station locations currently have pedestrian-only access to Expedia over the BNSF railroad tracks. There are clearly better places to focus transit funding and we should choose the best option that makes the Interbay alignment as a whole affordable, the Brown Line's surface station at Galer Street does just that.



Interbay

In Interbay, there still appear to be an opportunity to both save money and improve transit access. We would like to see a version of the brown line that moves the Thorndyke Station to Dravus Street west of 17th Ave for much better access. Elevated/surface variations of the BNSF alignment (brown line) should advance with a focus on as much surface rail as possible without traffic crossings for both high & low options.



The most essential feature that has been left mostly unaddressed is building for the future. ST3 must be built for expansion. That means expansion for a future Aurora Line, a future Madison Line, a future Airport Bypass, a Ballard/UW Line, a Ballard/Lake City Line -- all the lines on our [vision map](#). We implore the Sound Transit Board to look past the typical planning skirmishes and think about how this plan will be future proof and best serve riders.

Thank you again for the opportunity to comment and for doing what is best for the millions of people who will use Link, our city, our region, and the future.

Thank You,

Seattle Subway

OUR VISION

To steward a livable, vibrant, urban neighborhood supporting a diversity of residents of all ages and incomes while driving an innovative local economy and providing rich, cultural community opportunities.

OUR VALUES

Inclusiveness | Integrity | Respect | Transparency | Impartiality



April 2nd, 2019

West Seattle and Ballard Link Extensions EIS Scoping
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

<Via email: wsbscopingcomments@soundtransit.org>

Dear Ms. Swift,

The South Lake Union community submits the following thoughts for consideration in scoping of the Environmental Impact Statement for the Sound Transit West Seattle and Ballard Link Extensions through South Lake Union and the Denny Triangle neighborhoods.

Perhaps the most significant urban revitalization in America today, the economic vitality and urban vibrancy of South Lake Union is critical to Seattle's emergence and competitiveness as a driver of the global technology and health sciences economies. This neighborhood's success is predicated on the community-driven and City-adopted principles outlined nearly a decade ago in the [SLU Urban Design Framework](#) and [SLU/Uptown Mobility Plan](#).

To be specific:

South Lake Union and Denny Triangle stakeholders are in consensus that the "Blue Line" configuration with station facilities near 1. Denny Way / Westlake Avenue and 2. Harrison Street / Dexter Avenue best serve our North Downtown communities. These locations provide the best access to the high-density commercial and residential populations both south and north of Denny, including the SLU core and new employment centers north of Mercer Street, along with multiple access points and intuitive walksheds to the Seattle Center.

Transit Oriented Development and/or access points to station facilities in partnership with existing property owners is desirable, and the utilization of surplus City of Seattle properties at or near system access points provides opportunity to ease deficiencies in Seattle's workforce and low-income housing inventory. The location of a station near our proposed Mobility Hub at Harrison/Thomas and new 7th Avenue North creates opportunities for connections to the downtown core, multiple bus routes and Seattle Center, in an area that could support these housing types.

While the benefit of the West Seattle and Ballard Link Extensions is profound, our community strongly encourages Sound Transit to consider the following impacts of the construction process and system configuration on its scoping of the EIS.

Kyle Ducey
President
W.G. Clark

Andrea Owner
Vice President
Plymouth Housing Group

John Thomas
Treasurer
NBBJ Architects

Matthew Curry
Secretary
UW Medicine at South
Lake Union

Lloyd Douglas
Cascade Neighborhood
Resident

Jim Goodspeed
Goodspeed Architecture /
SLU Resident

Jake Sutherland
Resident

James B. Notkin
Kakao/415
Westlake/Union

John Pehrson
Cascade Neighborhood
Resident

Scott Rusch
Fred Hutchinson Cancer
Research Center

Ross Richards
Amazon

Kristie Logan
Seattle Cancer Care
Alliance

Matthew Mauer
Vulcan Inc.

Our priorities within the [SLU Urban Design Framework](#) & [SLU/Uptown Mobility Plan](#)

Equitable Housing | Design Review Collaboration | Public Safety
Equitable Community Engagement | Activation of Public Places | Sustainable Urban Mobility

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Existing Transportation Infrastructure: Existing mobility infrastructure in South Lake Union and Denny Triangle has already been heavily impacted by an unprecedented quantity of commercial construction as well as the installation of the new electrical distribution system disseminating from the Denny substation. Construction of a station facility at the Denny Way / Westlake location is expected to disrupt existing Bus Rapid Ride service along Westlake Avenue and Denny Way and existing Streetcar service along Westlake Avenue; both essential to the South Lake Union and Denny Triangle workforce. Furthermore, it is essential to consider the importance of efficient and unimpeded operations of private-workforce bus service operated by South Lake Union employers. The impacts associated with construction of the new stations must be sensitively mitigated to minimize disruption to business activities and residential life.

Pedestrian Flow and Safety: The safe, intuitive and efficient passage of pedestrians is crucial in South Lake Union and Denny Triangle. Close attention will be necessary to mitigate the pedestrian barriers that currently exist at Denny Way and Westlake Avenue to the south and Mercer Street and Dexter Avenue to the north. Exploring the utilization of station facilities and their access points as innovative passages to cross these barriers is encouraged.

Businesses: While the reasonably "short-term" impact of construction on local businesses is understandable, it is critical that intuitive and safe access to businesses be consistently provided, both for the local workforce and for visitors. These impacts should be considered not just on the major employers but also on the viability of street-side retailers that provide diversity and the defining character of South Lake Union and Denny Triangle. Other major considerations include the impacts of sidewalk closures, construction vibration (especially on the health-sciences infrastructure) and potential disruptions to freight hauling and short-term street parking.

Environment: Environmental concerns include noise, light pollution (if construction is allowed after daylight hours), air-borne particulate matter and storm water and construction run-off.

Impacts to The Neighborhood & Livability: "Livability" is an important byword in South Lake Union and Denny Triangle. It is essential to maintain a construction-period aesthetic that is commensurate with the community character and cultural life of North Downtown.

Permeability through the transportation infrastructure within our community can enhance neighborhood livability and improve the usability of the facility itself.

We strongly encourage the incorporation of public art, landscape planting and a variety of cultural amenities, not just within the boundaries of station facilities, but extending into the neighborhood. These could be project specific or implemented in conjunction with existing or planned cultural improvements, especially streetscape improvements.

Finally, while we are focused specifically on South Lake Union and Denny Triangle, it is imperative that corridor configuration, infrastructure and planning elsewhere in the line be designed to avoid a negative impact on system reliability. There is concern that system disruption resulting

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from bridge openings and other issues would negatively impact confidence in the system and ultimately ridership.

The community leaders of South Lake Union and Denny Triangle look forward to working together with Sound Transit in the efficient construction and timely completion of the West Seattle and Ballard Link Extensions.

Sincerely,

A handwritten signature in black ink that reads "Kyle Ducey".

Kyle Ducey
President, South Lake Union Community Council

Kyle Ducey
President
W.G. Clark

Andrea Owner
Vice President
Plymouth Housing Group

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TO: Sound Transit Staff

FROM: Transit Access Stakeholders: Transportation Choices Coalition, Futurewise, Feet First, Cascade Bicycle Club, Housing Development Consortium, Transit Riders Union, Sierra Club Washington, Rooted in Rights

Dear West Seattle and Ballard Link Extension EIS Staff,

Thank you for the opportunity to comment on the scoping of the West-Seattle & Ballard Link Extension Environmental Impact Statement. The Transit Access Stakeholders group is a growing coalition of organizations that strongly supports connecting the Puget Sound region through affordable, reliable, accessible, and sustainable transit. Together, we represent land use, active transportation, affordable housing, transit, and climate protection stakeholders, with thousands of members in the central Puget Sound region.

Early on in the planning process, several groups submitted a letter that reflected our collective values for Sound Transit 3. These values include:

- Maximize equitable TOD and affordable housing potential
- Integrate transit, bike, and walking networks
- Prioritize race and social justice
- Ensure travel reliability
- Minimize displacement
- Build a system that looks to the future

As our coalition has grown, we would like to add:

- Accessibility for all users, especially those with disabilities

ALTERNATIVES FOR STUDY

Given these values, consideration of our Level II comments, as well as additional data and information made available through the Level III analysis, we offer the following select route and station preferences for study in the EIS, plus comments regarding specific impacts related to each preference.

Segment	Preferred for study
West Seattle Stations and guideway	<p>West Seattle Elevated and West Seattle Tunnel Level III options -- Preferred for study</p> <p>Delridge station at 25th Ave. SW -- Preferred for study</p> <p>Alaska Junction Station at 41st or 42nd -- Preferred for study</p> <p>Any North-South alignment is preferred to the representative project’s East-West alignment. Impacts to potential bus/light rail integration must be studied at each station location.</p>

	<p>For any Delridge station options studied -- study impacts to bus transfer environment and displacement (see further comments regarding displacement below).</p>
SODO and CID	<p>5th and 4th cut-and-cover -- Preferred for study 4th Ave. mined station -- Preferred for study</p> <p>Progressing to Level III we have learned there are a lot of questions about all alternatives. As design progresses, we will more clearly understand these alternatives. Given all the unknowns, we recommend studying both the 4th and 5th shallow station options due to their potential for creating an easy and intuitive transfer environment, in line with the Jackson Hub vision. Transfer times as well as safety and ease of access between the CID station and Sounder, Amtrak and Metro must be studied in detail, beyond current estimates. A mezzanine connection between the stations, including cost and construction impacts, and potential benefits to safe and fast transfers, should be studied.</p> <p>Transit Access Stakeholders also support the CID/PSQ communities in their request for further study of a mined station along 4th Ave. To better understand costs and benefits, and to do right by this historically underserved community, it is necessary to more fully develop design and present additional data and information for decision making. To that end we also support the idea of conducting a Health Impact Assessment (HIA) to fully understand potential disparate health impacts related to the construction and long-term impacts of this station.</p> <p>Any alignment selected for SODO and CID/PSQ must study impacts to King County Metro's operations, current bus bases and base expansion plans, including construction and cumulative impacts to riders, service, and operations. Flexibility of operations for Sound Transit light rail via interconnections of new and existing lines should be included as well. Impacts to the SODO trail, including construction impacts and impacts to future connectivity and planned bicycle routes as outlined in Seattle's Bicycle Master Plan must be studied. Impacts to residents and businesses in the CID/PSQ, including construction and cumulative impacts like economic and cultural displacement must be studied.</p> <p>Selection of a deep-bore station for study must include a study of impacts to transfers, accessibility and integration along the remainder of the downtown route.</p>
Downtown tunnel	<p>5th Ave./Harrison Alignment -- Preferred for study</p> <p>A 6th Ave. route throughout downtown presents access challenges, and is less optimal for integration with existing transportation systems, particularly integration with the existing Westlake hub. If 6th/Mercer is studied, please study access impacts to people with disabilities as well as pedestrian/bicycle/transit integration and access issues related to the Mercer St. station placement. The 5th Ave/Harrison alignment provides the best placement for Seattle Center access and is well positioned for future transit-oriented development in South Lake Union area.</p> <p>We are concerned at the lack of prior discussion related to Seattle Streetcar operations. All downtown alignments must study, disclose and mitigate for potential disruptions to existing and planned streetcar operations and capital improvements. This is especially important as a fixed route line cannot be rerouted or detoured during construction.</p>
Smith Cove-Interbay	<p>Interbay Station at 17th Ave. W -- Preferred for study Study must consider impacts to regional multi-use trails.</p> <p>For Smith Cove stations studied, consider the ridership market to be served and potential for future destinations within a reasonable walkshed; avoid impacts to other key infrastructure.</p>
Salmon Bay crossing	<p>Tunnel crossing -- Preferred for study</p>

	If a fixed bridge is included in the EIS, construction impacts and displacement to community must be studied. The representative alignment, a moveable bridge, requires close coordination with the Coast Guard to identify a mid-level height that balances cost, grade, and frequency of interruption to minimize the quantity and duration of span openings. The effect on reliability of the entire line needs to be carefully analyzed if this option is advanced for further study.
Ballard terminus station	<p>Tunnel stations at 14th and at 15th -- Preferred for study</p> <p>For both tunnel station locations, we urge study of access points both North and South of market street. When studying construction impacts of cut-and-cover stations, please consider disruption and mitigation to existing transit, biking and walking connectivity. Potential mitigation could include completing the Missing Link of the Burke-Gilman Trail.</p>

SCOPE OF THE EIS

In addition to comments on routes and station preferences, we also want to offer additional comments regarding the depth and detail of several disciplines to be studied in the EIS. In particular, we would like to daylight impacts that may have been overlooked, may be challenging to quantify, and may disproportionately impact environmental justice populations, and yet are even more critical to consider.

Station Access, Mobility and Integration

When easily accessible, light rail provides a very safe way to travel compared to driving; better access to transit for wheelchair users; and coupled with easy and safe routes to walk and bike to trains, an opportunity for active transportation. We would like to see health and safety incorporated into the purpose and need statements, especially as they relate to station access and integration with other transportation networks. Maximizing the investment of light rail depends on excellent station access, and safe, comfortable and convenient connections to other multimodal networks. Ease and comfort of access to the system translates into more ridership, which should be a guiding principle in selecting among project alternatives for all sections of the project. Health and safety impacts must be studied throughout all access and integration issues, as they are fundamental to the usability of the system. In addition we offer the following comments:

- **Station access** - Intuitively and seamlessly finding and getting into the station is critical to the success of light rail. Study should include number of entrances/exits to stations and station visibility (stations should be designed and located such that they are highly visible, including details that are visually distinctive). The number of at grade crossings, and the quality of crossings (ie; signal timing, crossing distance, etc) to reach stations should also be studied. Crossings not only impact rail reliability, but the safety of users trying to access the station on foot or bike using crosswalks, putting them in the way of both cars as well as trains.
- **Transit transfers** - Fast and convenient transfers from light rail to light rail, bus, and heavy or commuter rail are integral to creating a function system. Study impacts to transfer times, ease of transfers (platform to platform transfers are ideal), multiple transfer options (stairs, multiple elevators on each side of the platform in case one elevator is out of service, escalators, escalators), direct connections, how many crosswalks and what is the "level of service" for transfers.
- **Integration with other modes** - Whether certain alignments help establish new networks, remove portions of existing networks, or create more dangerous crossings and access is critical information. ST should study the potential for direct connections between stations and planned/existing walk/bike facilities. Those facilities should include both neighborhood greenways and protected bike lanes, but should also acknowledge the difference between those facility types, in terms of how safe and comfortable they are to a range of user types (age, language, ethnicity, gender, race, ability). High-quality bike parking, including long- and short-term parking for individually owned bikes, and space for on-demand micro-mobility services must be appropriately designed (all covered; long term parking must be secure) located in highly accessible locations at all stations, in such a way as to not impede pedestrian flow. For downtown stations investing in bike hubs, rather than bike parking at all stations: Pioneer Square and a location in north downtown, such as Westlake, would be ideal.

- **Access mitigation for all ages and abilities.** During construction or as part of the final alignment, existing biking and walking networks will be impacted, thus creating inconvenient or potentially dangerous multimodal access. Ensuring safe, comfortable, and convenient interim and long-term passage for people biking and walking, paying special attention to individuals with any sensory or ambulatory impairment, is critical mitigation. Proper wayfinding and robust communications, legible to all communities regardless of English language ability is essential. Currently, Level 3 screening addresses modal integration, but without an explicit lens of health and safety. For example, construction in Sodo will impact the Sodo bike trail, one of few separated bikeways in the area.

Existing and Planned Transportation Networks

The networks that surround and connect into the WSBLE corridor will leverage this project's investments and expand its reach and ridership potential. It is necessary to ensure that connections, both between light rail lines as well as between local transit and non-motorized networks, not only are seamless, but also provide a robust travel shed for people for whom light rail is only one component of their trip. In addition, it is imperative that access and use of existing and future transportation networks are maintained throughout the construction period. Level 3 screening criteria includes some consideration of bus/rail integration and impacts to current and planned transportation facilities and services, but we would like to understand the following:

- **Consult local and regional transportation plans,** including King County Metro Connects, Seattle's Transportation Master Plan, Bicycle Master Plan, Pedestrian Master Plan, Freight Master Plan and State transportation plans and projects.
- **Local transit impacts.** It is imperative to study the short- and long-term impacts to local bus, train and streetcar service and infrastructure. The study should cover the ability of local transit to adequately serve regional connections to light rail as well as important complementary local routes during construction and in the long-term. In addition:
 - Identify impacts to existing transit service, and to service and capital projects planned throughout the construction period, including bus, Amtrak, Sounder, and Seattle Streetcar service.
 - Replace lost base capacity and access to base in comparable location. Study any potential impacts to King County Metro existing base capacity, and preventing future base expansions.
 - Using existing adopted transit plans of both the City and the County to understand planned capital and service transit improvements and routes.
 - Replace lost layover space in comparable location.
 - Replace dedicated transit pathways where dedicated pathways were lost in parallel/comparable location.
 - Stage construction for minimal transit operations impact.
 - Provide transit operating cost reimbursement when operations are significantly impacted.
 - Minimize construction impacts to accessing bus stops.
 - For all of the above, work closely with transit partners to identify best solutions.
- **Bicycle network impacts** The short and long-term implications and opportunities to leverage the bicycle network must be studied, including how specific station locations and adjacent facilities could create direct access via a connected all ages bike network. Furthermore, ST should study impacts to any existing bike facility, either during construction or over the lifetime of facility operations, and suggest appropriate mitigation. Specifically:
 - Identify impacts to the existing bike network, including major trail connections, due to construction or long-term operations. For example, the SODO Trail; Ship Canal Trail; Elliot Bay Trail; West Seattle Bridge Trail; Alki Trail and Duwamish River Trail. Identify appropriate mitigation, such as an alternate all ages and abilities route, for the duration of the time any route would be impacted.
 - Use the existing Bicycle Master Plan (BMP) to understand planned bicycle facility planning and routes, but also consider the following:
 - Several projects along routes listed in the BMP have advanced to final design/construction without inclusion of the bike facility recommended in the BMP.
 - Routes in the BMP were designed before ST3 was envisioned. Thus the route currently listed may not be the most appropriate in terms of location or facility type, or both, given this new context.

- Identify opportunities to leverage ST3 construction to complete and/or connect to identified routes in the BMP, either as construction mitigation or in order to provide access to the stations.
 - Study what types of bike infrastructure, and what level of wayfinding for people biking, best facilitates biking to the station. For example, neighborhood greenways in Seattle vary greatly in their design, and thus the comfort and convenience, as well as their perceived and actual safety vary. Furthermore, their location on neighborhood streets does not create the level of visibility that would enable users of other transportation modes to know that biking to the light rail station is an option.
 - As above, end of trip facilities are essential in making functional the bike routes that connect people to stations. Study how stations will not only serve people travelling on light rail, but also as community hubs, to ensure that capacity accurately reflects demand of the station area. Ensure that bike parking is placed conveniently, and with high enough initial capacity – plus space for capacity increases as the light rail system expands. Study the need for multiple types of bike parking, from regular racks to secure storage. Finally, ensure that during construction and the lifetime of operations, the existing capacity of bike parking is not reduced.
- **Pedestrian network impacts** The EIS must examine the short- and long-term impacts and opportunities for pedestrians. Specifically:
 - Light rail stations have the potential to promote the development of walkable urban centers in the surrounding areas. Evaluate and compare the potential of the various station site options for promoting pedestrian-oriented development.
 - The existence of a complete pedestrian network surrounding a light rail station is vital to attracting system users on foot. Are there any existing gaps or barriers in the station-area pedestrian network that need fixing? This includes improved pedestrian networks that should include lighting, increased accessibility across the station walkshed, and other enhancements to improve the pedestrian experience.
 - Elevated track and stations can potentially degrade the street-level pedestrian environment and casting shadows on people walking at street level. How are walking conditions impacted by the possible construction of elevated structures in West Seattle, Ballard, and elsewhere?
 - Construction of stations and other light rail system elements can last for many years, in the process blocking sidewalks and closing roadway crossings. Study all construction-related impacts to sidewalks, crossings and curb ramps, and mitigate appropriately for all ages and abilities, with extra consideration for accessibility needs.
- **Coordination with other major transportation projects**
 - Specifically include City of Seattle work on the Seattle Streetcar, Center City Bike Network, Ballard Bridge, overpasses in the Sodo neighborhood, and updates to freight circulation patterns in and around the Port of Seattle.

A Future-Oriented System

The buildout of this system must be considered as a multi-generational investment that will reach far beyond the geographic footprint of the West Seattle and Ballard lines. Our region is projected to grow by 1.8 million by 2050. As such, identifying impacts to the future buildout or connectivity of this system is imperative. We would like to see the following studied and assessed:

- **Future light rail expansion** - In both West Seattle and Ballard, study the potential opportunities and limitations of station placement and alternative placement in terms of future light rail expansion. Disclose any alternatives that would hinder future expansion.
- **Future bus/station integration** - Study growth potential for feeder service at all station locations, especially at line termini, where future light rail service is decades away. Ensure that stations are placed and designed with future bus feeder service in mind. For example, will future rapid bus lines service the Ballard terminus station, and how can the Ballard station be future-proofed to accommodate increased bus transfers?

- **Future station capacity** - Using projected population growth, study the impacts to station capacity. Consider how station planning will accommodate increased population and ridership, including platform size, entry/egress, payment systems,
- **Future land use** - Consider city comprehensive plans, long-term growth patterns, the effects of regional objectives that can affect city zoning and land designations such as Vision 2050, and trends in the areas of stations and alignments to help maximize the potential for transit-oriented development. Select compatible designs for the system stations and alignments that will serve the needs of the community as well as provide greater access to opportunity to more communities.
- **Flexible design for developing transportation technologies** - Considering the rapid evolution of transportation technologies, station design should, to the extent possible, be future-proofed for flexibility. We know that the future light rail system will be integral to future mobility; but we do not know how the advancement of autonomous vehicles, shared services, micromobility, etc. will change, shape or require flexibility in light rail access in the future.
- **Technological considerations** - As transportation technologies advance, so do other technologies including payment systems, customer service, safety technologies, cellular and wifi service, and so on. Consider how to technologically equip stations for other future needs.
- **Designing for uncertain climate future** - Structures, especially underground ones, should be designed and constructed to withstand the effects of rising sea level and more extreme temperatures and hydrologic events. Resilience in both the operational details of the system and the human user interaction of accessing these transit elements should be a guiding principle of design.
- **Designing for an accessible future, rather than designing to meet the minimum requirements under the ADA.** Adding accessibility to existing infrastructure is far more costly than including accessible features in the initial design (see NYC subway). As our city, and our society at large, age and move towards recognizing that disabled people have a right to accessible transportation infrastructure, we should be designing a system that gives us full and equitable access.

Displacement

While Sound Transit and the EIS process seem well equipped to understand the potential direct displacements from construction and eminent domain, we still have concerns about a) the disproportionate impact of these displacements on certain demographics, and b) the possible impacts of longer term economic and cultural displacement due to rising land values and gentrification.

- **Understand and disclose impacts to hard-to-reach populations** - Sound Transit currently evaluates acquisition and displacement burden on low-income and “minority” populations. While Sound Transit technically has a robust relocation program, we remain concerned that this information may not equally reach those who do not speak English, renters (both commercial and residential), and those who are undocumented. It may be harder to tap into communities where English is not the first language without interpreters and community liaisons. Anecdotal evidence suggests that landlords may not pass on relocation information to tenants due to worries that they will not fulfill their remaining lease. Most undocumented persons will not be able to access relocation benefits, due to federal restrictions.
- **Equitable access to relocation benefits** - We urge Sound Transit to thoroughly analyze potential displacement impacts disaggregated by renter/owner, income, race, English proficiency, and a rough understanding of where immigration status may be an issue (without revealing anything that could be used against communities) in order to understand disproportionate and/or different impacts across alignments as well as ensure the agency has a robust plan to ensure equal access to benefits. Sound Transit should continue to explore innovative mitigation strategies related to relocation for undocumented residents.
- **Cultural and Economic Displacement** - Though much harder to measure, many planners are using models to predict the risk of longer term economic displacement in an area due to critically important but landscape-altering transportation investments. Sound Transit should use tools such as these (PSRC now has a displacement risk tool) to identify areas with high displacement risk and work directly with the community to understand the

anticipated impacts from different alignments, and the appropriate mitigation to help people stay in their homes and jobs and maintain their cultural cornerstones and POC-owned businesses.

Environmental Justice

Currently, Sound Transit's level 3 screening criteria considers impacts to historically underserved populations with a focus on access to opportunity (activity nodes) and burden of property acquisitions and displacements. We believe this analysis must go deeper:

- **Analyze all discipline areas using meaningfully disaggregated data by race and income** - Though some analysis has been conducted by Sound Transit, for each of the different EIS impact discipline areas, we should be disaggregating data by race and income to uncover potential disproportionate burden. For example, fish and wildlife habitat impacts may disproportionately impact cultures and communities that rely on fishing in the area.
- **Consider cumulative impacts on historically marginalized populations** - The public should understand disparate impacts across all disciplines -- especially considering cumulative impacts on these groups from ongoing systemic discrimination, especially and including impacts from racist policies in the built environment, ongoing challenges of displacement from a fast growing city and region, and historical lack of outreach and representation in government decision-making.
- **Evaluate proposed mitigation using the Racial Equity Toolkit** - Given historic and cumulative impacts, mitigation should look not just to do "no disproportionate harm" nor to "expand mobility for the region's residents, which include transit dependent, low-income, and 'minority' populations," but work to target and prioritize mitigation for these groups and ensure that mitigation is tailored, based on authentic engagement, to be valuable to the impacted communities. Sound Transit should use tools such as a Racial Equity Toolkit to evaluate proposed mitigation.
- **Improve demographic language** - We must also ensure that while the language we use is sufficient to meet EIS requirements that it also respects all the communities we serve. We ask that the agency move away from the term "minority," which is not only disfavored by communities of color, but can often be technically untrue, especially in diverse areas like the Puget Sound. In an age when citizenship is used to threaten individuals and separate families, we also ask that you remove the term "citizens" from your Purpose and Need and analysis, unless the term is explicitly being used in order to understand the impacts, especially of displacement and relocations, on undocumented residents.

Thank you for the opportunity to comment on the scoping of the EIS. We look forward to continued engagement around this project.

Sincerely,

Kelsey Mesher
Transportation Choices Coalition

Vicky Clarke
Cascade Bicycle Club

Katie Wilson
Transit Riders Union

Bryce Yadon
Futurewise

Patience Malaba
Housing Development Consortium

Tim Gould
Sierra Club Washington

John Stewart
Feet First

Anna Zivarts
Rooted in Rights



Neighborhood
with a Sense
of Community

Inclusive
and diverse

Thriving
Arts District

Home to
Seattle Center

Great local
businesses

Walk, Bike,
Bus, Monorail,
(and drive)

Diverse and
affordable
housing

Historic buildings
with character

Open space for
healthy living

Distinguished
cultural and
philanthropic
organizations

March 28, 2019

Sound Transit
West Seattle and Ballard Link Extensions
Attention: Lauren Swift
401 S. Jackson
Seattle, WA 98104

Re: ST3 EIS Scoping Comments

Dear Ms. Swift:

Thank you and Sound Transit for the opportunity to provide comments on the West Seattle and Ballard Link Extensions (WS/B) during the Environmental Impact Statement (EIS) scoping period. Uptown Alliance, Uptown Arts & Culture Coalition and our community supports the WS/B project and we are excited that the project has reached this preliminary EIS stage.

We eagerly anticipate the arrival of Link Light Rail in the Uptown Urban Center – one of the fastest growing areas in Seattle. Between now and the planned opening of the Uptown Link Light Rail station we and city planners foresee the following:

- Our residential population has nearly doubled over the last 10 years and we expect it to double again by the time WS/B opens. A significant number of new multi-family residential projects are now under construction due to our recent upzone.
- In the Heart of Uptown, more than 100 local businesses including restaurants and bars, grocery stores as well as large employers such as The Gates Foundation and Holland America Cruise Line provide economic stability.
- Uptown as a major hub for Metro bus routes, the Monorail connection to downtown and a pedestrian grid making it an ideal location to live and work between Amazon in South Lake Union, Expedia in Interbay or an office high rise in downtown.
- The Uptown Arts District boasts the largest concentration of arts and culture organizations in the Pacific Northwest, bringing patrons for award-winning events and a large creative workforce.
- 15 million annual visitors travel to Uptown to visit the Seattle Center and its year round events and attractions.
- Now under construction, the New Arena at Seattle Center will soon host an estimated 18,000 new sports fans and entertainment patrons on an almost daily basis.

Attached is a matrix that outlines our specific comments expressed at many well-attended Uptown community meetings and discussions held over the past year. We greatly appreciated the presence of Sound Transit staff at most of these meetings to provide helpful background information and answer questions. From these Uptown community meetings, a strong consensus has been reached in these major areas:

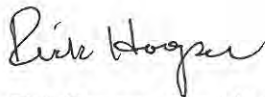
- The final alignment and station must support multiple above grade entrances to Seattle Center and Uptown's commercial core.
- All station configurations must be designed to enhance the pedestrian experience to and from the station with an emphasis on safety, lighting, wayfinding and open space.
- Station access points must be designed to reduce the need for at-grade pedestrian crossings of congested arterials; for example access from both the north and south sides of Mercer St.
- Station design and access points should reflect the vibrancy of the Uptown Arts District and engage local artists and musicians for the Uptown station and entrances.
- Station design and access points should facilitate transit oriented opportunities (TOD) with a priority for affordable housing.
- It is time for Sound Transit to evolve the name of the new Uptown station from "Seattle Center" to "Uptown/Seattle Center." Significant branding of the official neighborhood name is underway and will be well entrenched by the time WS/B arrives.

From our recent community involvement with the New Arena at Seattle Center EIS, we also strongly advocate for scoping impact analyses in the SEPA component and in the NEPA Alternatives Analysis to include performance metrics for mitigation of potential construction and operational impacts. Specifically, for the Uptown/Seattle Center station, this should include +/- growth scenarios with respect to a baseline for the build-out of Uptown Urban Center and growth and expansion of facilities in Seattle Center as anticipated in the EIS for the Uptown upzone. The analysis also should assume completion of the Seattle Waterfront project.

While we considered making a specific route recommendation, we chose not to do so at this time. We think it is appropriate to further study an Uptown/Seattle Center station location along either a Republican or Mercer route. We understand significant possible constraints exist with either route; in particular our more detailed comments in the Attachment note concerns with a cut and cover approach on heavily traveled Mercer – suggesting a more expensive boring approach will likely be needed. Additionally, we look forward to understanding better how the South Lake Union station will enhance the access to Uptown and the Seattle Center.

Our specific comments support an overarching vision for the Uptown Arts District that has been shaped over the last several years with significant input from Uptown stakeholders, including the Uptown Alliance, Uptown Arts & Culture Coalition and our community partners. Our shared vision is a growing Urban Center that becomes even more vibrant and livable over time and includes: multimodal transportation options, an equitable and diverse community, pedestrian focused with active sidewalks, and spaces that are safe and welcoming to all. Only through a strong and continuous partnership between Uptown, Sound Transit and the City of Seattle will the optimum station outcomes unfold. We look forward to working with Sound Transit over the coming years to further focus and refine the design vision for a successful Uptown/Seattle Center station.

Sincerely,



Rick Hooper, President
Uptown Alliance



Cyrus Despres, President
Uptown Arts & Culture Coalition

Cc: John Marchione, Sound Transit Board Chair

Mayor Jenny A. Durkan

Deputy Mayor David Moseley

Councilmember Sally Bagshaw

Sam Assefa, Office of Planning & Community Development Director

Sam Zimbabwe, Seattle Dept. of Transportation Director

Robert Nellams, Seattle Center Director

Attachment: Route and Station Alternatives
 EIS Topics
 Project Purpose and Need

**ROUTE AND STATION ALTERNATIVES
SCOPING COMMENTS**

Uptown/ Seattle Center	
Republican/ Republican Representative (green)	<ul style="list-style-type: none"> • Initial community comments favored Republican alignment. • Central to the Heart of Uptown local businesses. • Supports strong access to Uptown's residential area east of the Arena. • The large volumes and strong directional flows of pedestrians through the Uptown neighborhood that the station will generate must be thoughtfully analyzed and manipulated by means of station entrances and configuration to ensure that the increased pedestrian traffic will generate positive outcomes for the residential and commercial area. • Republican alternative could tie into cultural celebration of August Wilson Way. • KEXP and its gathering space are a vital community partner that actively connects the neighborhood and Seattle Center. • Address how station area planning will be undertaken and coordinated between ST and the City of Seattle to ensure the consideration of big picture opportunities and limitations of the locations of stations in Uptown (north and east of SC). The station area planning should address strengthening the heart of Uptown, integration of SC with the neighborhood and the enhancement of the Uptown Arts District.
6th/ Mercer	<ul style="list-style-type: none"> • Due to the high traffic volumes on Mercer

<p>W Seattle Elevated (brown)</p>	<p>and the essential arterial function this street serves for both our neighborhood and the region at large – Uptown has special concerns about the construction impacts that any Mercer alignment option would entail.</p> <ul style="list-style-type: none"> • We do not propose eliminating the alignment from consideration but do suggest that construction feasibility of Mercer options be given close scrutiny. • As an example, a cut and cover tunnel for any sizable segment of a Mercer alignment might cause unacceptable levels of disruption to the entire corridor. • Any station configurations should be designed to lessen impacts on pedestrian safety by providing station access points on both the north and south sides of Mercer, thereby reducing the need for at-grade pedestrian crossings of this congested arterial. • The Mercer corridor has great potential for continued cultural, residential and commercial growth reinforcing a Mercer arts & sciences boulevard. • Pedestrian volumes and traffic patterns along Mercer as a result of the light rail station can contribute to an active, vibrant Mercer streetscape. • Decisions on station location and configuration should support, not hinder, a robustly active Mercer corridor. • Address how station area planning will be undertaken and coordinated between ST and the City of Seattle to ensure the consideration of big picture opportunities and limitations of the locations of stations in
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	Uptown (north and east of SC). The station area planning should address strengthening the heart of Uptown, integration of SC with the neighborhood and the enhancement of the Uptown arts and cultural district.
South Lake Union	
5th/ Harrison/ Republican W Seattle Tunnel (blue)	<ul style="list-style-type: none"> • Design with intention to provide alternative access to entering Uptown and Seattle Center from the east. • Maximize higher ridership potential due to better pedestrian and bus options. • Leverage more station entrance options for better pedestrian access. • Address how station area planning will be undertaken and coordinated between ST and the City of Seattle to ensure the consideration of big picture opportunities and limitations of the locations of stations in Uptown (north and east of SC). The station area planning should address strengthening the heart of Uptown, integration of SC with the neighborhood and the enhancement of the Uptown arts and cultural district.

EIS IMPACTS SCOPING COMMENTS

<p>Acquisitions, Displacements and Relocations</p>	<ul style="list-style-type: none"> • Consider this impact area in the context of at least two different scenarios: slower growth rate in Uptown between today and start of construction and a more rapid growth rate. • Address impacts of a cut and cover approach along Mercer St or other main commercial streets to businesses in Uptown that depend on continued access and who are concerned that significant disruption may permanently damage the ongoing success of their businesses. • Address displacements of arts and culture venues which operate at a low profit margin both with respect to physical displacement and business disruption. • KEXP and its gathering space is a vital community partner that actively connects the neighborhood and Seattle Center and impacts that disrupt their business impacts the entire community. • Address impacts to the many small businesses in Uptown which could be differentially impacted by acquisitions and the effect on the sustainability of the unique arts and culture brand in the Uptown Arts District. • Address the impact of Uptown's recent upzone which has created properties that are currently underdeveloped and present opportunities today that may not be available in the future. • Address ways Sound Transit can be a catalyst to attract top rate developers into Uptown.
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Resources	<p>space at grade with amenities, including ample bike parking.</p> <ul style="list-style-type: none"> • Address ways to incorporate Crime Prevention Through Environmental Design (CPTED) and other appropriate strategies. • Address ways to enhance Uptown's green factor with major plantings and preservation of tree canopy. • Address ways that Uptown, which is currently underrepresented with recreational uses, community gardens, etc., will have enhanced open/ green space. • Evaluate the impacts from station access on current open space such as Seattle Center which currently provides open space amenities for many residents of Uptown and the city. • Evaluate the provision of recreational and artistic opportunities within the station (similar to what exists in New York City and other subway systems).
Public Services, Safety and Security	<ul style="list-style-type: none"> • Address ways for station configurations to be designed to lessen impacts on pedestrian safety by providing station access points on both the north and south sides of Mercer, thereby reducing the need for at-grade pedestrian crossings of this congested arterial. • Address ways to improve Universal Access for pedestrians of all ages and abilities to support Uptown's diverse residents and visitors. • Address ways to support ongoing maintenance and operation for Safe, Clean and Welcoming station and entrances. • Address ways to distribute the large volumes

	<p>and strong directional flows of pedestrians through the Uptown neighborhood that the station will generate. These volumes must be thoughtfully analyzed and manipulated by means of station location and configuration to ensure that the increased pedestrian traffic will generate positive outcomes for the area.</p> <ul style="list-style-type: none"> • Address other measures to ensure pedestrian safety, such as appropriate light levels, clear wayfinding signage and CPTED design strategies should be incorporated.
Soil Impacts, Community Facilities and Neighborhoods	<ul style="list-style-type: none"> • Address ways that the station is represented as “Uptown/ Seattle Center” immediately on all future materials. • Address ways that station location and configuration will improve and enhance the Uptown’s Urban Center, not degrade it. Uptown values its high-functioning, historic urban fabric. • Address ways for added details such as a meaningful and active open space associated with the station, artwork appropriate to Uptown’s arts and culture identity, wayfinding signage, landscaping with tree canopy, etc. will all contribute to Uptown’s unique identity and branding. • Address ways that provide major access routes and station entrances that support Uptown’s neighborhood commercial core: “Heart of Uptown”. • Address ways that serve Seattle Center with its own station entrance to better serve its annual 15 million visitors and Arena attendees. • Address ways to support and enhance the Uptown Neighborhood Design Guidelines.

	<ul style="list-style-type: none"> • Address ways to support and enhance the Uptown Urban Design Framework. • Address ways to balance station location and design to distinguish access for Seattle Center patrons and local residents and businesses.
Transportation (traffic, freight, navigation, transit, non-motorized)	<ul style="list-style-type: none"> • Consider this impact area in the context of at least two different scenarios: slower growth rate in Uptown between today and start of construction and a more rapid growth rate. • Address ways that Sound Transit will lead the way in integrating the transit option into everyday living in Uptown. • Address ways for the final route to provide separate access points to the Seattle Center and Uptown's commercial core. • Address ways to provide effective integration with other transit systems already in Uptown. • Address ways to support and enhance the Arena Community Advisory Group's transportation and mobility Goals to: <ul style="list-style-type: none"> – align mobility improvement implementation with community priorities and vision; – increase connectivity between North Downtown and adjacent neighborhoods; – increase accessibility and convenience of sustainable transportation options for people walking, biking, and taking transit to support growth and accommodate Seattle Center events, while reducing automobile trips.
Utilities	<ul style="list-style-type: none"> • No comment.
Visual and Aesthetics	<ul style="list-style-type: none"> • Address ways to support new Uptown Arts District branding immediately in all ST3 marketing materials.

	<ul style="list-style-type: none"> • Address ways that station design and access points will reflect the vibrancy of the Uptown Arts District. • Address ways to engage local artists in the design of Uptown station and entrances. • Address ways that the design of the station's spaces can be crafted to engage with musicians and performance artists with acoustics and intentional performance space.
Water Resources	<ul style="list-style-type: none"> • No comment.

**PROJECT PURPOSE AND NEED
SCOPING COMMENTS**

ST3 PURPOSE STATEMENTS	
Provide high-quality rapid, reliable and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the ST3 Plan (Sound Transit, 2016).	<ul style="list-style-type: none"> • Uptown Alliance is confident that a light rail station in our neighborhood will prove to be a great asset to future livability; however, we do not take it for granted as an automatic outcome of Sound Transit's design process. • Only through a strong and continuous partnership between Uptown Alliance, Uptown Arts & Culture Coalition, Seattle Center, Sound Transit and the City of Seattle will the optimum station outcome unfold.
Improve regional mobility by increasing connectivity and capacity through downtown Seattle to meet projected transit demand.	<ul style="list-style-type: none"> • Stations must support and enhance good connectivity to bus routes. In the case of Uptown – enhancing connection to the Monorail is equally important.
Connect regional centers as described in adopted regional and local land use, transportation and economic development plans and Sound Transit's Regional Transit Long-Range Plan Update (Sound Transit, 2014).	<ul style="list-style-type: none"> • No comment.
Implement a system that is technically and financially feasible to build, operate and maintain.	<ul style="list-style-type: none"> • Since both Republican and Mercer route alternatives offer potentially significant constraints/ cost considerations a robust cost/ benefit study combined with the

	<p>high ridership of this area served is critical during the EIS process.</p>
<p>Expand mobility for the corridor and region's residents, which include transit-dependent, low income and minority populations.</p>	<ul style="list-style-type: none"> • Encourage the development of community benefits that unique serve the Uptown residents business and visitors.
<p>Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development and multimodal integration in a manner that is consistent with local land use plans and policies, including Sound Transit's Transit Oriented Development and Sustainability policies.</p>	<ul style="list-style-type: none"> • "Encourage" is not a strong enough principle; instead, we believe ST should "Facilitate and help create". • A transit project of the scale of WS/B must be a strong catalyst for dense mixed-use development. • WS/B is not merely about movement of people. To be judged a success, the project must sustain and support the healthy growth of communities along the project alignment. • Station location and configuration in Uptown must create opportunities for significant development, including housing (both affordable and market rate) and street level commercial. • A public/ private agreement that ensures development concurrent with Uptown station construction is very much preferred. • An Uptown/ Seattle Center station with only a single entrance and exit would not sufficiently support the two constituent areas the station is intended to serve. All designs for an Uptown/ Seattle Center station require separate access points to the Seattle Center and Uptown's commercial core.

Encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections consistent with Sound Transit's System Access Policy.	<ul style="list-style-type: none"> • Regional transit projects such as WS/B must enhance the efficacy of mass transit by providing the best possible connectivity to other sustainable means of transportation at each station point. • The large volumes of pedestrian traffic generated by the light rail station in the Uptown/ Seattle Center area must be carefully assessed. Pedestrian safety is a paramount concern. • First and foremost this means direct, safe and easy pedestrian access to all Uptown stations entrances. • Adequate bike parking and safe access by bike must also be a part of all station location and design.
Preserve and promote a healthy environment and economy by minimizing adverse impacts on the natural, built and social environments through sustainable practices.	<ul style="list-style-type: none"> • No comment.
ST3 NEED STATEMENTS	
When measured using national standards, existing transit routes between downtown Seattle, West Seattle and Ballard currently operate with poor reliability. Roadway congestion in the project corridor will continue to degrade transit performance and reliability as the city is expected to add	<ul style="list-style-type: none"> • No comment.

70,000 residential units and 115,000 jobs by 2035, without any major expansions in roadways.	
Increased ridership from regional population and employment growth will increase operational frequency in the existing downtown Seattle transit tunnel requiring additional tunnel capacity.	<ul style="list-style-type: none"> • No comment.
Puget Sound Regional Council (PSRC), the regional metropolitan planning organization, and local plans call for High Capacity Transit (HCT) in the corridor consistent with VISION 2040 (PSRC, 2009) and Sound Transit's Regional Transit Long-Range Plan Update (Sound Transit, 2014).	<ul style="list-style-type: none"> • Stations must also support and enhance good connectivity to bus routes. In the case of Uptown – enhancing connection to the Monorail is equally important.
The region's citizens and communities, including transit dependent residents and low-income and minority populations, need long-term regional mobility and multimodal connectivity as called for in the Washington State Growth Management Act.	<ul style="list-style-type: none"> • No comment.
Regional and local plans call for increased residential and/or employment density	<ul style="list-style-type: none"> • Look for opportunity and partnerships to broaden economic equity not only through transportation options but other

at and around HCT stations, and increased options for multimodal access.	<p>urban needs like open space, affordable housing, and community services.</p> <ul style="list-style-type: none"> • EIS should include a benefit analysis of development opportunities at each alternative.
Environmental and sustainability goals of the state and region, as established in Washington state law and embodied in PSRC's VISION 2040 and 2018 Regional Transportation Plan, include reducing greenhouse gas emissions by decreasing vehicle miles traveled.	<ul style="list-style-type: none"> • No comment.



Tuesday, April 2nd, 2019

West Seattle and Ballard Link Extensions
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Dear Ms. Swift:

Thank you for providing an opportunity for businesses, citizens, and the public at large to share thoughts and comments on the scope of the Environmental Impact Statement (EIS) analysis for the proposed West Seattle and Ballard Link Extensions. We appreciate Sound Transit and the Elected Leadership Group's demonstrated dedication to providing the public ample opportunity to be a part of the dialogue and decision-making for a project that will revolutionize this beautiful city and region and how we travel within it.

Thank you, too, for taking the time to consider the specific concerns of The Vera Project (VERA) and our fellow Seattle Center resident organizations, all of which help to make up the cultural fabric of not only the Uptown/Lower Queen Anne neighborhood, but the City of Seattle at large. The Vera Project is acutely aware that the ST3 light rail expansion has the potential to provide enormous benefit to the city, neighborhood, Seattle Center campus, and our own programming, and we are dedicated to working collaboratively to ensure that this project equitably serves our shared community.

First off, we'd like to contextualize VERA's positioning in our region's music & arts community. Rooted in grassroots activism and community organizing, The Vera Project was founded in 2001 as a solution to Seattle's Teen Dance Ordinance and the associated inaccessibility of live music and arts education programming for young people. Since then, we have become a nationwide model for accessible live music opportunities and arts-based education for all. We currently help to build a competent, professional, and enthusiastic workforce for Seattle's music, art, and event-production industries, while simultaneously creating space for emerging and established musicians and artists



in our 350-person capacity showroom and 75-person capacity gallery stage. Altogether, The Vera Project draws over 13,000 attendees to our Seattle Center home each year by hosting over 175 annual concerts, weekly classes, and ongoing youth leadership opportunities. Our events are unique in that they are always all-ages, alcohol-free, and in a safe space designed for young people that participate in music and arts activities that cannot be replicated anywhere else in the City.

The Vera Project's mission is to fuel personal and community transformation through collaborative, youth-driven engagement in music and art. We do that in three ways: **education and experiential learning** via workshops and classes, **accessible presentation** of visual arts and live music opportunities, and **community participation** in the form of volunteering, membership, and committees. Within our visual arts programs, our community gallery hosts 10 art shows a year and our screen printing studio provides community members an affordable and accessible space to create year-round. To complement our live sound offerings, we also have a recording studio and host a minimum of 48 audio engineering classes, 36 screen printing workshops, and 6 five-week DJ classes annually. This is all in addition to the 175 all ages concerts a year in our safe space with up to 16 volunteer opportunities per show. We onboard new volunteers several times a month, and offer volunteers the opportunity to participate in our unique member-led governance structure, which is comprised of five programmatic committees that meet monthly to keep us accountable, responsive, and relevant.

Though we are, and will always be, a welcoming space for attendees of all ages, we have a special focus on the young people ages 14-24 (who make up over 60% of our audience) and other marginalized voices. All programming at The Vera Project is directly guided by the communities we serve, and it is with these communities, voices, and constituencies in mind we are writing to inform the EIS analysis.

The Vera Project strongly supports the plan to extend light rail service and are thrilled to welcome Link Light Rail to Uptown/Lower Queen Anne and to the Seattle Center campus. We are privileged to be part of a strong arts and culture campus that is centrally located and already welcomes millions of visitors annually. Transportation infrastructure like this contributes to a truly equitable region, and is a game-changer for those who struggle getting downtown and have to pay exorbitant amounts for parking.



The Vera Project has no strong preference between the two proposed station alternatives. Both Republican Street and Mercer Street have their pros and cons. For *Republican Street*, we are worried the construction impact and operational underground light rail system, with all of its noise and vibrations, will make it nearly impossible to provide our consistent and critical all-ages music and arts programming. However, we love the fact that the station's proximity to our facilities would increase foot traffic and play a critical role in improving accessibility and enriching the Seattle Center. The *Mercer Street* station gives us considerably less pause in terms of construction and negative impact to our programming, but we also acknowledge the potential lost opportunity to welcome visitors directly into Seattle Center and our facilities.

Even though we are at a minimum of seven years out from construction of this project, VERA remains concerned that construction activities will make it difficult for visitors and patrons to attend shows, events, classes, and other gatherings at our space, and that the noise and vibrations during construction and operation of the ST3 expansion will adversely affect all of our programming. Additionally, impacts on transportation to and parking in our neighborhood during construction will decrease attendance for these programs as well as our all-ages concerts. VERA is the only all-ages venue of its kind in the City of Seattle and the importance of this safe space for the our City's youth cannot be overstated.

Moreover, The Vera Project is troubled that the ST3 project and its attending construction activities will prohibit our organization from expanding our programming to meet the needs of our community, innovate and expand upon our existing models of creative workforce development, provide out-of-school "alternative" arts education, and serve as a source of youth empowerment via intergenerational, cooperative leadership.

The Vera Project is a unique organization unlike any other within the City of Seattle, serving otherwise unrepresented communities and citizens. We hope you understand and appreciate the critical need for VERA to maintain programming during construction activities and the future operation of the regional transit project. Again, we are deeply committed to lending an active, productive voice to this process and working collaboratively to ensure the success of the ST3 project at the Seattle Center for all involved parties and the Greater Seattle Community.



Thank you again for the opportunity to comment on the scope of the EIS analysis. We look forward to collaborating on this project, and would love to be able to host community comment, feedback, and listening sessions for the Uptown/Lower Queen Anne/Seattle Center communities through the planning, construction, and operation of the ST3 project over the next decade.

Truly & Sincerely,

A handwritten signature in black ink, appearing to read 'Ashraf'.

Ashraf Hasham,
Executive Director

A handwritten signature in black ink, appearing to read 'Ricky'.

Ricky Graboski,
Development & Advocacy Director



April 2, 2019

Lauren Swift, Central Corridor Environmental Manager
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Dear Ms. Swift,

The West Seattle Junction Neighborhood Organization (JuNO) represents homeowners, renters, business operators, and other community members - all of whom are excited about the prospect of light rail coming to West Seattle, but who also want Sound Transit to use a once-in-a-generation opportunity to plan for this arrival wisely.

After reviewing the presentations from Sound Transit to our community, JuNO has chosen to support a light rail line that enters the West Seattle Junction Urban Village (WSJUV) by tunnel and ends facing south at an underground station at either 41st or 42nd Avenue SW.

We are convinced a tunnel with this alignment will spur the construction of affordable housing the neighborhood badly needs; reduce construction-related displacement; maximize the potential for transit-oriented development (TOD); and increase the two-way ridership needed to fund Sound Transit's operational budgets.

Simply put, there is a far greater upside to an underground alignment of light rail.

This letter provides details on why this alignment is critical to the economic growth and livability of the WSJUV and its surrounding areas, as well as scoping comments that detail specific environmental-impact issues that must be studied for any alignment option.

Thank you for the work with our community to date. We look forward to a continued, productive partnership that makes the most of this generational opportunity.

Sincerely,

Amanda Sawyer, Executive Director

Carl Guess, JuNO Public Relations

Rich Koehler, Janine Rees, Kevin Freitas, Joe Fuller, Christy Tobin-Presser & Louis Manuta -
JuNO Land Use Committee



Fast Growth, Destination Neighborhood, Finite Buildable Land

With 84% housing growth, the WSJUV has been the fastest growing urban village in Seattle since the year 2000; ¹ that city-leading growth is forecast to continue through at least 2035. ²

This growth is of no surprise to people who live in the area. West Seattle is a vibrant community with family friendly traditions, historic buildings and legacy businesses that make it a destination neighborhood. Need pickled walnuts? Go to Husky Deli. An old Nina Simone recording? Head to Easy Street Records. Or just walk the Farmers Market any month of the year for newly picked produce, fresh yogurt, or some of the best falafel in the city.

This unique and characted neighborhood will draw riders on light rail to the WSJUV and let them experience things they can't find in other parts of Seattle.

Yet land is a finite commodity in the city - and becoming even less so.

With a population of 686,800 in 2016, Seattle is projected to add 120,000 by 2036. ³ That growth has caused local legislators to adopt land-use rules to further increase density. The recently passed HALA/MHA legislation, for example, increased zoning and removed parking requirements in 27 urban villages, including the WSJUV, to maximize the use of buildable land to create more affordable housing.

Less visible, but equally impactful, are stresses that ongoing growth and development have placed on livability in the WSJUV. The City has already designated it *underserved* in terms of parks and open space. What's more, JuNO independently measured the available tree canopy approximately 12 months ago and found it to be roughly half the citywide average.

With an affordable-housing shortage and land being in limited supply, bringing light rail into a dense community in an above-ground fashion is a complete contradiction to making the most of the buildable land that is currently available.

Below-Ground Approach Has Far Greater Upside

While a tunnel and underground station will impact the community and result in some displacement, it will also create the opportunity to develop denser housing options. Those options could include affordable housing; work spaces and other TOD efforts that draw people into the neighborhood and increase two-way ridership; and the opportunity for much-needed green space above an underground station to serve a growing population.

¹ Seattle 2035, Appendix A, Figure A-1

² Seattle 2035, Appendix A, Figure A-1

³ Seattle 2035, Introduction.



More Affordable Housing

One unfortunate consequence of the HALA/MHA legislation is that it won't bring many units of affordable housing to the WSJUV. That's because the MHA program allows developers the option of building those units or paying the City to build them *elsewhere*. After upzoning more than 400 single-family homes in the WSJUV, the City estimates developers will create only *nine* units of affordable housing;⁴ the rest will be offered at market rate.

Fortunately, the City has committed to a 2020 update of the WSJUV neighborhood plan. This plan will recognize the forecasted light rail alignment and station placement. That means the community has the opportunity to create more affordable housing units, making it more economically diverse and access to light rail more equitable.

Yet an above-ground alignment would make these efforts exceedingly difficult. The current Orange Line proposal, for example, would permanently remove the land of 120 parcels from development.⁵ Gone forever would be the opportunity to build taller buildings with more units for families seeking affordable housing.

New Work Spaces, TOD, Increased Two-Way Ridership

The 2020 neighborhood-planning effort could also create what JuNO has long envisioned: multi-use buildings that include working spaces. The ability to create a jobs center in the heart WSJUV area would allow people to walk, bike, and bus to work - without ever getting on a West Seattle Bridge that has only become more crowded.

For Sound Transit, a jobs center would create increased two-way ridership. Instead of full rail cars bringing workers into Seattle, only to return empty, office buildings would help draw more riders that would help fund a greater share of the light rail operating budget.

Again, a far better use of scarce buildable land.

Greenspace

The WSJUV is *underserved* with respect to parks and open space⁶ and a growing population will only put greater pressure on that parkland. A below-ground station could add available open space through the creation of a landmark public plaza or park. Assuming that some Seattle Parks land is taken from the golf course area, this would be a great opportunity to perform a swap and essentially move greenspace on the periphery of the WSJUV to a location that is centrally usable by the surrounding rental units and our broader community.

⁴ MHA FEIS Section 3.1 Ex39

⁵ Sound Transit Presentation - JuNO 3/25/19 Meeting

⁶ Seattle 2017 Parks Plan



EIS Scoping Comments

JuNO requests that Sound Transit study the following issues in preparing its draft Environmental Impact Statement for the West Seattle light rail extension:

Aesthetics

- Analyze how the proposed structure of an elevated alignment would impact the aesthetics of the remaining residential neighborhood and business district.

Emergency Services

- Study the impact of an elevated track on emergency services, including impacts that would change or degrade current response times.

Canopy

- Measure the baseline tree canopy in the WSJUV and, separately, along the proposed light rail routes;
- Analyze the impact on tree canopy of elevated track and station vs. a tunnel and underground station within the WSJUV.

Cost

- Study the cost-saving impact of the removal of the Avalon station.
- Study previous tunnel-related efforts by Sound Transit that have resulted in budget savings, including the construction of the Northgate Tunnel.
- Study and enumerate alternative funding opportunities including, but not limited to, additional federal, state, and City contributions; and excise and/or other taxes.

Equity

- Study equity-of-access on a system-wide basis, paying particular attention to those neighborhoods where light rail enters underground into dense communities with hilly topographies (i.e., First Hill, Capital Hill, University District).

Height, Bulk & Scale

- Study the impact on views, privacy, shading effects, and access to light at all levels below track, including but not limited to street level, of an elevated track and station.



Housing

- Calculate current housing units lost/displaced due to construction of an elevated track and station vs. a tunnel and underground station within the WSJUV.
- Study the feasibility of adding greater density, including square footage for employment opportunities and affordable housing, to the core commercial areas east of the Junction, also known as the Triangle.

Infrastructure

- Study the impact of all construction activities on city streets, including but not limited to the damage to roadways caused by equipment and the costs to repair.

Livability

- Perform a noise evaluation of an elevated track and station vs. a tunnel and underground station within the WSJUV, including octave-band and vibration analyses.
- Conduct all noise analyses for these three areas:
 - Construction zone;
 - Construction lie-down area;
 - Parcels along alignment right of way not acquired through eminent domain.⁷
- Study the light-pollution impact of an elevated track and station vs. a tunnel and underground station - both during and after construction.

Parks & Open Space

- Analyze the opportunity to create new park lands as part of an underground station.

Traffic

- As the WSJUV is one of the few access points to the West Seattle Bridge, conduct a traffic study - for both an elevated track and station and a tunnel and underground station - to understand the impact on cars and busses during construction and once light rail is operational.

⁷ It is crucial to understand the daily noise impact on those whose structures will be left standing once construction is complete.



Transit-Oriented Development

- Study the TOD potential for an elevated track and station vs. underground tunnel and underground station within the WSJUV.
- Study bus integration for station placement for elevated track and station vs. a tunnel and underground station within the WSJUV
- Study pedestrian and bicycle access transit, taking into account topography and potential hazards, for elevated track and station vs. a tunnel and underground station within the WSJUV.

Walkability

- Measure the impact on walkability of elevated track and station vs. a tunnel and underground station within the WSJUV.
- Study the impact of making Alaska Street a pedestrian walkway, as envisioned in the Junction Design Guidelines (SMC 23.41.004).

WEST SEATTLE TRANSPORTATION COALITION

March 31, 2019

West Seattle and Ballard Link Extensions
c/o Lauren Swift
401 S. Jackson Street
Seattle, WA. 98104-2826

Sent by Email: wbscopingcomments@soundtransit.org



Re: *ST3 West Seattle and Ballard Link Extension EIS Scoping Comments on Level 3 Alternatives*

Dear Stakeholder Advisory Group, Elected Leadership Group, and Sound Transit Board Members:

The West Seattle Transportation Coalition (WSTC) works to address transportation and mobility issues for Seattle's largest constituency – the nearly 100,000 people living on the 10 square miles of the West Seattle Peninsula. WSTC's top issue has always been ingress-egress and mobility issues between our neighborhoods and Downtown or points beyond. The West Seattle Bridge Transportation Corridor (WSBTC) is the city's busiest transportation artery. It connects us with major north-south routes (SR 99, E Marginal-Alaskan Way, Airport Way, and I-5), and carries more than 122,000 vehicles a day – 14,000 on the Spokane St Swing (low) Bridge, and 108,200 on the High Bridge (*SDOT 2017 Seattle Traffic Flow Map*).

WSTC sponsored the first public Light Rail Planning Workshop in West Seattle in June 2017. Our constituents know that light rail to West Seattle will be the biggest transportation project to affect our Peninsula this century, and they want to ensure we make improvements that benefit all of our neighbors in ways that outweigh negative impacts wherever possible:

- By providing new transportation alternatives to the vehicle congestion in the WSBTC;
- By ensuring that guideway and station locations bring real, tangible benefits to the neighborhoods directly affected and not just impacts to views and acquisition of homes and businesses;
- By protecting historic buildings, community gathering spaces, and businesses in the economic enterprise nodes within and around Youngstown and the Alaska Junction Urban Village; and
- By reflecting long-standing community outreach and neighborhood planning goals.

We seek to identify options that will best meet the needs of affected communities from the West Seattle Peninsula – including White Center and further points south(west) – and SODO. This includes not just those in the walkshed or living near the guideway and stations, but also those arriving by bicycle, bus, and other modes. **Comments presented here are based on input to and outreach conducted by WSTC to date, and reflect three main objectives for the EIS Scoping Process:**

1. Consider alternatives that present real, significant, and useful differences for study and comparison in identifying the best route options and station locations.
2. Ask the right questions to gather the data that will drive the final decisions made by the ST Board.
3. Consider disruption during and after construction, and provide suitable mitigation measures for what will be considerable change, including the possible destruction of historical structures and communities along proposed routes.

1. The EIS process must consider alternatives that present real, significant, and useful differences for study and comparison in identifying the best route options and station locations.

While the WSTC has long supported Sound Transit's goals of conducting an efficient, cost-effective, and concise process to identify alternatives for study in the EIS, we have grown increasingly concerned as we get deeper into the process. What began in Level 1 with a series of significantly different route and station possibilities – reflecting considerable attention to public input – has narrowed into alternatives that bear very little difference to each other.

Questions left to be studied in the EIS appear to be merely whether or not the guideway runs just to one side of the West Seattle (High) Bridge or the other and is the station better here or just a block further down the same street in one direction or the other. While there is a significant cost impact to going “elevated vs tunnel,” for 1/3 of the route the *only* option is elevated in order to cross the river, and for another 1/3 the comparison is only about how *high* the guideway and station should run through Delridge. This does not seem in the spirit of early outreach and consideration of public comments, and also greatly increases the risks that engineering beyond the current 5% threshold could discover insurmountable construction hurdles or cost impacts in the future that would require us to re-start the process anew.

The WSTC Board believes it is imperative to forward an additional tunnel and elevated option into the Draft EIS process. Many community comments suggest bringing back the Pigeon Ridge/West Seattle Tunnel “Purple Line” or a version of the Level 1 Yancy Street elevated option through North Delridge.

We believe further study of additional alternatives beyond the current Level 3 options might accomplish any or all of the following:

- reduce the need for real estate acquisitions and noise mitigation
- increase train speeds and travel times by reducing or eliminating curves
- avoid impacts to sensitive environmental areas on Pigeon Point and at Longfellow Creek
- reduce impacts to Port operations, which could yield 3rd Party funds to support any increased costs of construction
- reduce impacts to historic buildings, community gathering spaces, and businesses in the economic enterprise nodes within and around Youngstown and the Alaska Junction Urban Village

2. The EIS process must ask the right questions to gather the data that will drive the final decisions made by the Sound Transit Board.

As important as it is to reduce alternatives for study and to help the Sound Transit Board drive to a decision that will reflect budget realities, system considerations, and the “will of the people” at the ballot box, it is also important for the Board to have access to actual data about the costs and impacts of the decisions they will be making.

Therefore, **the WSTC Board believes the EIS *must* study the cost and ridership impacts of deferring one of the three proposed ST3 station locations.** WSTC is not advocating at this time for or against eliminating a station from the line. We are elevating comments by constituents who have called for dropping Avalon Station or truncating the line at Avalon or even Delridge, especially if it helps to reduce negative impacts to the neighborhoods.

As part of both ST1 & ST2 projects, Sound Transit deferred station locations and truncated whole lines approved by voters. Since that precedent has already been established, WSTC is asking the ST Board to gather the data to understand how forecasted ridership, environmental, cost, and other impacts are affected by their eventual decision. Are these data and impacts significant enough to alter what the voters for ST3 envisioned or not? Would building only two stations severely impact ridership or would ridership adjust itself? Can Metro adequately serve all three proposed locations with its future route planning or not? Could the savings from station deferment provide funding to support other changes desired by the community or not? We won't have sufficient answers to these questions if we do not study them.

3. The EIS process must consider disruption during and after construction, and provide suitable mitigation measures for what will be considerable change, including the possible destruction of historical structures and communities along proposed routes.

Sound Transit needs to conduct an analysis and eventually receive a federal determination regarding (a) impacts to environmentally-sensitive green spaces and pedestrian/bike trails in the vicinity of Pigeon Point and North Delridge, and (b) impacts a Genesee alignment might cause as the guideway and columns run along or near the northern property line of a golf course or even just inside it.

Therefore, the WSTC Board recommends further study of the so-called 4(f) impacts to the Seattle Parks and Recreation facilities at the Delridge Community Center & Playfield and the West Seattle Golf Course.

We are not calling for further study of the previous Level 1 alternative which cut across the West Seattle Golf Course, but of additional options for the current alternatives under consideration as engineering continues to advance, including:

- West Seattle Golf Course property line impacts – Beyond considering whether the guideway is at or “just inside” the golf course, what if it was also 25, 50 or 100 feet? How far can the guideway be moved to avoid impacts to the residential neighborhood before it causes irreparable harm to the Golf Course – and more harm than would be caused to the hundreds of residents in the neighborhood north of Genesee?
- A slight deviation of the Level 3 “Blue Line” – What if the guideway remained on Delridge Way SW until the intersection with Genesee and only then began to curve west, crossing the Delridge Community Center property, and possibly requiring acquisition of the existing building or other nearby facilities for a station, before curving back towards an alignment generally along Genesee or just inside the golf course property line as it heads up to the Avalon neighborhood?
 - This would require acquisition of fewer properties, and could dramatically reduce neighborhood concerns about residential displacement.
 - This small change would support repeated calls by the community to push the station as far south into the Delridge neighborhood as possible.
 - This presents an opportunity to provide a significant benefit to a historically marginalized and diverse neighborhood, whereby a brand-new recreational facility could be built (similar to the Rainier Beach Community Center in southeast Seattle), possibly combined with affordable housing or other community benefit facilities. While this would require third party funding and partnership previously outside the scope of Sound Transit's construction, it also presents a once in a lifetime opportunity to build up Delridge as a community and as a destination, with excellent service from elsewhere across the peninsula by bus or train.

Sound Transit engineers only in the last couple of months developed an option for the Level 3 alternatives that includes the so-called “Orange” or “Yellow” elevated line running across the residential East Alaska Junction Neighborhood. This option was never considered in initial ST3 project development, is not reflective of the ST3 ballot language, and was never shown and discussed in public until the most recent Level 3 public open houses.

While the WSTC supports EIS study of elevated options for West Seattle, this option would destroy an entire area of historic homes and divide a neighborhood in ways similar to the recent Viaduct we took down on the Waterfront or parts of I-5 and I-90 that the City of Seattle is studying for lids.

Therefore, the WSTC Board recommends *removing* this option from further study in the EIS. We also strongly urge Sound Transit staff, as they study the impacts of routing an elevated guideway from the Avalon area into the Urban Village and a north-south alignment suitable for future extension to the south, to conduct extensive and repeated outreach to neighbors in the area.

The WSTC looks forward to working with all of you throughout the Environmental Impact Statement process and beyond. Together, we are committed to helping Sound Transit deliver the elegant solution that will benefit all of the 100,000+ people living, working, and visiting the West Seattle Peninsula for many years to come.

Thank you for the opportunity to comment.

In Community,



Michael Taylor-Judd
Chair, West Seattle Transportation Coalition Board
info@westseattleetc.org / www.westseattleetc.org

Cc: WSTC Board
Seattle Mayor Jenny Durkan
Seattle City Councilmember Lisa Herbold
Seattle City Councilmember Lorena Gonzalez
Seattle City Councilmember Mike O’Brien
Bill LaBorde, SDOT
King County Executive Dow Constantine
King County Councilmember Joe McDermott
Chris Arkills, KCDOT
Port of Seattle Commissioner Stephanie Bowman
Lindsay Pasternak Wolpa, Port of Seattle
West Seattle Blog
West Seattle Herald



March 28, 2019

Submitted via email to: WSBscopingcomments@soundtransit.org

West Seattle and Ballard Link Extensions, c/o Lauren Swift
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Re: Scope of the EIS for West Seattle and Ballard Link Extensions Project

Dear Ms. Swift:

The Wing Luke Museum of the Asian Pacific American Experience (The Wing) has been a community cultural anchor in the Chinatown-International District (CID) for over 50 years. Locally, neighborhood stakeholders have identified us as a sacred space; we are one of the largest economic drivers in the neighborhood (second only to Uwajimaya); and we continue to be a cultural asset that is led and stewarded by the community. Regionally, we are a destination place for Asian Pacific Americans who want to stay connected to their roots and for residents from other ethnic backgrounds who want to learn more about the APA communities that have enriched our City and region for over 100 years. Nationally, we are a recognized, one-of-a-kind cultural leader – the only pan-Asian Pacific American museum in the country, a Smithsonian Institution affiliate and an Affiliated Area of the National Park Service.

Our visitor experience and our Museum's viability rely upon the cultural integrity, authenticity and vitality of the CID. Indeed, the neighborhood is our largest exhibit. We have a growing neighborhood tours program that directly partners with over 50 small businesses in our area. Our 2016 visitor survey indicates that 84% of our visitors are coming to The Wing for the first time. Half of our guests have never visited the CID before, and when they visit The Wing 75% also visit a neighborhood business.

With this interdependent relationship between us and the CID, we are greatly invested in the potential impacts and opportunities of the CID station associated with the Sound Transit West Seattle and Ballard Link Extensions project. Decisions related to the station location and type of construction must take into account and prioritize the impact on the cultural integrity of the CID. Our neighborhood already is facing unprecedented displacement pressures, and the Environmental Impact Statement (EIS) must take into account the heightened risk of displacement and gentrification that often comes with new transportation developments and station locations. When our community invested \$24 million to rehabilitate our 100-year-old historic building and create a new home for our Museum, we meant it to be our forever home. We urge you to consider the EIS with this same perspective in mind – decisions made today will have impacts for generations to come.

In this light, we are incumbent to be thorough in evaluating multiple options through the EIS process. We urge you to continue to study the Fourth Avenue alignment options. A multiplicity of variables in the EIS itself also must be evaluated, encompassing the community as a whole and evaluating along racial, social, economic and environmental factors.

The CID has been at the epicenter of public works projects time after time after time. The 2nd Avenue Extension cut through the heart of the earlier Chinatown; the I-5 freeway cut our neighborhood in two; the many sports stadiums continue to impact our community events, programs and business life throughout the year; and the First Hill streetcar and spur line resulted in approximately 1/3 business loss during its lengthy construction. The CID, its residents, businesses and community organizations have bore the brunt of each project again and again. Now we ask you to take to heart what decades of experience has taught us – centering people, valuing what makes us special and distinct, taking care to evaluate many options on multiple factors in complex situations, and taking the advantage of making investments to have greater impact when opportunities arise is the route to creating a region that is welcoming, accessible, culturally rich, visionary and inspiring.

Sincerely,

Beth Takekawa
Executive Director