



West Seattle and Ballard

Link Extensions

May 2022

DEIS Comment Letters

Ballard Link Extension Businesses and Business Organizations



615 Westlake Avenue N
Seattle, Washington 98109
206.548.7000

April 26, 2022

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

Re: Allen Institute comments on the Denny and South Lake Union Stations – WSBLE Draft Environmental Impact Statement

Dear Ms. Swift,

On behalf of the Allen Institute, I am writing you in response to the West Seattle and Ballard Link Extension (WSBLE) Draft Environmental Impact Statement (DEIS) with a particular focus on the Denny and South Lake Union stations. We recognize this extension is a critical component of Seattle's transportation infrastructure and we wish to express our support for a mix-and-match approach that selects the DT-1 South Lake Union Station on Harrison Street and the DT-2 Denny Station on Terry Avenue. We strongly support an alternative route that avoids a tunnel alignment under Mercer Street for the South Lake Union Station. Alignment beneath Mercer Street could negatively impact multiple research organizations, including our own.

The Allen Institute is an independent, nonprofit medical research organization, conducting highly sensitive research on the brain, our cells and the human immune system. To have the greatest impact on human health, we make our data, tools and other resources openly available to researchers around the world. Our science is driving new discoveries in everything from COVID-19 and cancer to Alzheimer's disease and autism.

In addition to the DEIS response provided to you by the Mercer Corridor Stakeholders Group, we would like to comment further on the vibration, noise and electromagnetic impacts described on page ES-31 of the DEIS Executive summary. The Allen Institute is one of a growing number of life science research organizations in the South Lake Union neighborhood whose work could be adversely impacted by the WSBLE Alternative DT-2 South Lake Union Station on Mercer Street.

Much of our scientific research, and that of our colleagues, relies on the use of specialized microscopes, probes and other experimental rigs that are extremely sensitive to vibration, noise and electromagnetic fields. Light rail generates significant amounts of all three. A WSBLE Alternative DT-2 South Lake Union Station on Mercer Street calls for light rail trains passing our research facility at 615 Westlake Avenue N. many times per hour. Entire experiments and studies could be destroyed by such disturbances, causing irrecoverable delays to our research and slowing the pace of discoveries that impact our collective health.

The Allen Institute strongly opposes a South Lake Union Station on Mercer due to its proximity to our headquarters. These concerns would extend beyond construction and into daily WSBLE operation.

In addition, the DT-1 proposes a four-year closure of Westlake Avenue. This is problematic, as the Allen Institute and the neighborhood depend on Westlake Avenue as a primary north/south corridor for traffic and transit. We urge you to advance a mix-and-match option that avoids impacts to Mercer Street near research institutions and combines the DT-1 South Lake Union Station on Harrison with the DT-2 Denny Station on Terry Avenue, providing an excellent public transportation option for our employees and avoiding harmful impacts to our science.

Sincerely,

A handwritten signature in black ink, appearing to be 'Rui Costa', with a large, stylized initial 'R' and a horizontal line crossing through the middle of the signature.

Rui Costa, DVM, PhD
Incoming President and CEO

cc:
Allen Institute: Marjorie Thomas, CFO

April 26, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson Street
Seattle, WA 98104-2826

Via email to WSBLEDEIScomments@soundtransit.org

Re: Comments on West Seattle and Ballard Link Extension Draft Environmental Impact Statement for 615 Westlake Avenue N

Dear Ms. Swift,

This comment letter is submitted on behalf of Washington Builders LLC in response to the West Seattle and Ballard Link Extension (the “**WSBLE**”) Draft Environmental Impact Statement (“**DEIS**”) published by Sound Transit.

Washington Builders LLC looks forward to the expanded light rail network serving the region through the WSBLE. Since beginning operations in 2009, Link Light Rail has been a critical and positive asset in our region, improving access to the job centers that bolster our economy and connecting people and places in ways that only a few decades ago seemed unimaginable. The expansion through ST3 will further the economic and environmental benefits that come from a large integrated transit system, and we are excited by the positive outcomes that have been achieved upon the opening of each new segment in recent years. Sound Transit is now faced with the enormous and nearly impossible task to navigate the various alignment options and to hear the voices of Puget Sound citizens who will be impacted by this immense project. We appreciate the time and effort that have been invested thus far; however, crucial aspects of the WSBLE DEIS analysis must be modified, strengthened, and expanded upon in the Final Environmental Impact Statement (“**FEIS**”) to better inform stakeholders and the public about anticipated significant impacts resulting from the WSBLE and to inform route decisions. Based on the current iteration of the DEIS, Washington Builders LLC has numerous concerns regarding potential significant impacts to the South Lake Union neighborhood, especially surrounding transportation and transit access.

South Lake Union is one of Seattle’s most important neighborhoods. It is a major employment center for more than 77,000 workers¹, a vibrant residential district, a center for culture and recreation, and the location of Kenmore Air, an international seaplane airport. In addition to major tech companies, South Lake Union is home to thousands of scientists

¹ Puget Sound Regional Council, covered employment estimate for South Lake Union Regional Center as of March 2020.

conducting life-saving research at multiple biotechnology firms including nonprofits like Fred Hutchinson Cancer Center, University of Washington School of Medicine, Institute for Systems Biology, and the Allen Institute (located in this building). Over the past two decades, South Lake Union's population has grown to more than 20,000² residents who live in 13,000 apartments and condominiums including more than 1,100 subsidized income- and rent-restricted homes. South Lake Union is also a major recreational and cultural center, home to the Museum of History and Industry ("MOHAI") (with as many as 150,000 visitors annually), the 12-acre Lake Union Park, the Center for Wooden Boats, numerous marinas, and REI's flagship store. Finally, the neighborhood is on the transportation route to highly populated neighborhoods to the north including Wallingford, Fremont, Eastlake, and the U-District.

I. Washington Builders LLC owns property at 615 Westlake Avenue N (the "Property"), which will be impacted by the WSBLE.

The Property is occupied by the Allen Institute, which conducts cutting-edge bioscience research in laboratories in the building and employs nearly 700 individuals. The building was purpose-built for the Allen Institute, and due to the nature of the work conducted in the building, it is particularly sensitive to vibration and electromagnetic field interruptions.

II. The DEIS does not adequately consider, discuss, and address numerous potential WSBLE impacts.

A. *The transportation and traffic analysis fails to adequately disclose impacts of the DT-1 Westlake Avenue Station Alignment in South Lake Union.*

South Lake Union is a unique, steadily growing neighborhood. Sound Transit must ensure the neighborhood's transportation needs are addressed both by placing stations in locations that best serve local transportation and transit demands, and by minimizing negative transportation and transit impacts from construction of WSBLE tracks and stations. To understand the impacts of work proposed in the DEIS, Washington Builders LLC retained Transportation Engineering NorthWest to conduct an independent review of the DEIS. The review concluded the DEIS lacks adequate information about the full scale of these impacts during construction and as a final condition on the surrounding streets, intersections, and properties, and the DEIS provides very little information on necessary mitigation measures.

To better understand the assumptions in the DEIS transportation analysis and to understand the resulting impacts, we request that the following information be provided by Sound Transit for public review:

- Synchro/analysis outputs at studied intersections
- Detailed trip assignment of diverted traffic volumes and routing by segment/intersection (including bus routes and volumes)

² <https://www.niche.com/places-to-live/n/south-lake-union-seattle-wa/>

- Timing and sequencing of road closures, and overlapping road closures
- Interim intersection and roadway channelization (including lane geometry and turn restrictions)
- Detailed assessment of how emergency vehicle routes would be impacted by the planned closures during the construction period
- Level of service (“**LOS**”) analysis results for the interim/during construction period in the Downtown Segment of the Ballard Link Extension

As discussed in more detail below, the neighborhood would be best served by locating the Denny Station at Terry Avenue (the Alternative DT-2 alignment), instead of Westlake Avenue, and locating the South Lake Union Station at Harrison Street (the Alternative DT-1 alignment), rather than Mercer Street. Washington Builders LLC urges a full analysis of this hybrid approach in the FEIS.

i. *Impacts from Westlake Avenue closure during construction require further study.*

Westlake Avenue is the main corridor into and through South Lake Union. Visitors, employees, and residents depend on it for direct access to South Lake Union’s residential and commercial uses. This corridor is a lifeblood to organizations located on Westlake Avenue, but also throughout the neighborhood. These businesses are only beginning to recover from the economic harm caused by the global COVID-19 pandemic. Westlake Avenue is the neighborhood’s most direct connection to the Lake Union waterfront, terminating at Lake Union Park and connecting patrons to MOHAI and the Center for Wooden Boats.

In addition to serving the South Lake Union community, Westlake Avenue connects downtown to neighborhoods throughout the City of Seattle and the region. In Seattle, Westlake Avenue is the primary north-south transportation thoroughfare. It connects South Lake Union with Downtown and provides a key connection for people traveling from downtown to Seattle’s north neighborhoods, including Fremont, Wallingford, U-District and Ballard. Regionally, Westlake Avenue provides connections to Mercer Street and the I-5 on and off ramps and SR-99.

For those who rely on transit, Westlake Avenue is a critical pathway for many bus routes and includes dedicated transit lanes to provide efficient and reliable transit service. South Lake Union is unique in that more employees in this neighborhood take transit to work than almost any other neighborhood in Seattle or the region. According to Commute Seattle, more than 67% of employees arrive at work by a means other than single-occupancy vehicle trips. Many critical transit routes depend on Westlake Avenue.

Westlake Avenue also hosts the South Lake Union line of the Seattle Streetcar, providing convenient public transit access between South Lake Union, to the downtown retail core and all major transit connections, and in the coming years, to Pike Place Market, Pioneer Square, Chinatown-ID, First Hill, and Capitol Hill. Pre-pandemic, the South Lake Union line of the Seattle

Streetcar alone carried more than 500,000 passengers per year³, and ridership is anticipated to grow exponentially with the connection of the two existing lines and completion of the Center City Connector.

The DEIS states that construction of the Denny Station under Alternative DT-1 would close segments of Westlake Avenue for at least four years and would include temporary closures to 7th Avenue, 8th Avenue, and Blanchard Street. The Transportation Technical Report (the “**Transportation Report**”) estimates that closures on Westlake Avenue would divert about 900 to 1,100 vehicles per hour (in 2032 PM peak hour) to use Dexter Avenue and Fairview Avenue instead. DEIS Transportation Report, Table 4-56. According to Table 4-39 of the Transportation Report, portions of Westlake Avenue already operate at a LOS F. If Westlake Avenue closes, this congestion will make traffic in the surrounding street network much worse. Also, because Denny Way is where the grid shifts, there are few continuous arterials that connect from south of Denny Way to north of Denny Way making it very difficult to effectively detour transit routes that now use Westlake Avenue.

In addition, traffic diversions from 7th Avenue, 8th Avenue, and Blanchard Street may add additional traffic congestion on nearby streets, including Dexter Avenue, Fairview Avenue, and 6th Avenue. Extended closures of Westlake Avenue would increase congestion on nearby streets due to traffic diversions. Sidewalk closures would also be needed at several locations near the proposed station entrances, which could result in lane reductions to maintain safe pedestrian access.

With respect to the transit impacts, Table 3-37 of the Transportation Report indicates that construction of the Denny Station in Alternative DT-1 would impact up to 40 buses per hour on Westlake Avenue, including the Seattle Streetcar, RapidRide C, Route 40, and a future RapidRide route. By comparison, Terry Avenue is not part of any bus route, and therefore bus disruptions would only occur as part of any closure to Denny Way, which the DEIS estimates to be 9 months. Furthermore, the DEIS states that Seattle Streetcar impacts for Alternative DT-2 could be circumvented by constructing one block of temporary streetcar tracks on Harrison Street to replace the existing streetcar tracks on Thomas Street. Maintaining uninterrupted Seattle Streetcar service will be particularly important during the interruptions to reliable bus routes during construction. Overall, these transit impacts are considerably less severe than those that result from the long-term closure of Westlake Avenue.

Given the continued importance of Westlake Avenue as a central thoroughfare serving South Lake Union, this closure is untenable for the neighborhood’s commercial and residential viability and for the other neighborhoods that depend on access through Westlake Avenue. Closing Westlake Avenue means displacing traffic onto adjacent streets that already suffer from low LOS grades and directional constraints. Closure will cause gridlock and the need for

³ Seattle Department of Transportation, 2020 Annual Streetcar Operating Report, October 2021.
http://www.seattle.gov/documents/Departments/SDOT/Streetcar/2020_Streetcar_Operations_Report.pdf

increased circulation and backtracking on side streets, leading to further LOS degradation and increased greenhouse gas emissions. It also means halting Seattle Streetcar service that is critical to meet the public transportation needs of the neighborhood, especially during a period of increased traffic congestion and bus route interruptions. The Seattle Streetcar should be used as a tool to help mitigate traffic impacts due to WSBLE, not suffer closures that will further exacerbate the inevitable gridlock.

It is critical to keep Westlake Avenue open to allow a central roadway, complete with a dedicated transit lane and uninterrupted Seattle Streetcar service, to access South Lake Union's residential and commercial uses.

To avoid closing Westlake Avenue and the associated harms such closure would bring, Sound Transit should select the Terry Avenue alignment for Denny Station. The Terry Avenue alignment in Alternative DT-2 allows for crucial traffic routes serving South Lake Union to remain open and keeps the Seattle Streetcar functioning.

- ii. *Pedestrian and bike impacts of the Alternative DT-1 Westlake Avenue alignment operations and construction impacts for all alternatives must be analyzed in the FEIS.*

In conjunction with the additional transportation and transit analysis noted above, the DEIS must also further analyze pedestrian and bike impacts. The Terry Avenue alignment for Denny Station would be better for pedestrians, as compared to the Westlake Avenue alignment. Most community members will access Denny Station by walking or biking. DEIS Transportation Report, pgs. 6-40 and 6-41. However, under the Alternative DT-1 Westlake Avenue station location, pedestrians would be released into a Westlake Avenue crosswalk operating at LOS F, whereas the crosswalks serving the Alternative DT-2 Terry Avenue station location have "sufficient capacity to meet demand" for pedestrians. DEIS Transportation Report, pg. 6-41. The FEIS should further study the potential safety and traffic impacts associated with pedestrians using a crosswalk operating at LOS F under the Alternative DT-1 Westlake Avenue location for the Denny Station, particularly compared to the more favorable Terry Avenue pedestrian condition.

The FEIS must also include more detail and analysis concerning which sidewalks and bike lanes will be affected during construction of the WSBLE. As noted on pages 6-47 and 6-49 of the Transportation Report, it's unclear whether certain sidewalks and bike lanes will be affected by WSBLE construction. Sidewalks and bike lanes are crucial to allow non-motorized traffic through South Lake Union. Closures or rerouting of these important multi-modal corridors will affect traffic patterns, demand for public transit, business displacement, and recreation opportunities, among other impacts. Analyzing these closures cannot "be coordinated with the City of Seattle in later phases of project development." The Transportation Report, pg. N.1E-1. To understand the direct, indirect, and cumulative effects of the WSBLE, the FEIS must clarify and examine the potential effects should pedestrian and bike infrastructure be inaccessible. If

not enough is known at this point, then the FEIS should analyze a worst-case analysis for sidewalk and bike lane closures that aligns with the identified roadway closures.

B. *Sound Transit should pursue the Alternative DT-1 Harrison Street alignment for South Lake Union Station to provide convenient, safe access for pedestrians, and limit impacts to Mercer Street.*

The South Lake Union Station should be placed in the location best situated to serve the local community and provide safe access points. As shown in Table 3-31 of the Transportation Report, the preferred Alternative DT-1 Harrison Street alignment of South Lake Union Station would garner nearly twice the ridership of the Alternative DT-2 Mercer Street alignment of the station. Furthermore, as discussed on pages 6-40 and 6-41 of the Transportation Report, while all crosswalks surrounding the Harrison Street station location have capacity to handle the anticipated increased pedestrian usage, the same is not true of the Mercer Street station location. The FEIS must further study the potential safety and traffic impacts associated with pedestrians using a crosswalk operating at LOS F under the Mercer Street alignment of the South Lake Union Station.

Traffic considerations also support a Harrison Street alignment of South Lake Union Station. Mercer Street is a heavily traveled roadway, generating between 18,100 and 35,000 trips per day. DEIS Transportation Report, pg. 4-79. It is the primary connection to I-5 from Seattle's westside neighborhoods. Despite this, Alternative DT-2 would lead to lane closures on Mercer Street, negatively affecting congestion and access to and from South Lake Union, I-5, and the region more broadly. The FEIS should further study and consider the cumulative impacts on traffic, including pedestrian traffic and pedestrian safety, should portions of Mercer Street be closed during construction.

While an alignment on Harrison Street is preferred to Mercer Street for the reasons listed above, the DEIS does not provide sufficient information on construction impacts to traffic, noise, vibration, or timing with regards to Harrison Street closures. The DEIS states that construction of the South Lake Union Station under Alternative DT-1 will partially or fully close Harrison Street between 6th Avenue and 8th Avenue for varying periods ranging from 1.5 years to 4 years. These closures impact access to properties throughout the neighborhood and will increase congestion on nearby streets due to traffic diversion. Sidewalk closures would also be needed at several locations near the proposed station entrances, which could result in lane reductions to maintain pedestrian access. The DEIS states that traffic would be diverted to parallel streets, likely John Street and Mercer Street, but does not provide adequate information on the ability of these streets to absorb this additional capacity. Should Harrison Street be closed, Sound Transit must ensure that comparable routes are available, and that access is maintained to SR-99.

To minimize impacts to the extent possible, more information is needed to understand how Sound Transit could minimize the geographic footprint of the South Lake Union Station

construction area as well as minimize the time required for street closures. To the extent possible, Sound Transit should investigate alternative less disruptive construction approaches.

C. *The FEIS must consider business, non-profit, and residential displacement and impacts due to changes in traffic patterns and business accessibility.*

South Lake Union is home to a wide range of organizations, which will be affected by traffic impacts during and after WSBLE construction. These organizations range from our major employers to longtime fixtures of our Seattle community, such as MOHAI, community gathering spaces catering to music and cultural events, non-profits critical to supporting community members throughout the region, and small businesses who rely on foot traffic accessibility to survive. While the DEIS highlights and discusses organizations that will be affected where Sound Transit directly takes property, the DEIS fails to analyze how organizations will be affected where new traffic impacts affect access to their businesses and decrease foot traffic. See DEIS Sections 4.3.1.3.3 and 4.3.3.3.4.

Displacement comes in many forms, and loss of patrons, and therefore revenue, due to the WSBLE impacts can result in non-profit and business closures in the same way as physical taking. Traffic impacts that make non-profits and businesses hard to reach and limit patronage will result in a *de facto* displacement of the non-profits and businesses. The mere ability to physically reach an organization does not mean the organizations will not be displaced due to the WSBLE. Furthermore, loss of businesses and other organizations also has an upstream effect on building owners who rely on rent from commercial spaces. To fully understand how each alternative will affect the South Lake Union community, the FEIS must analyze business and non-profit displacements due to traffic and access impacts under the various alternatives. The FEIS must expand its displacement analysis to account for these indirect impacts in addition to direct physical business and non-profit displacements.

In addition to business and non-profit uses, South Lake Union also supports a wide range of housing types, with over 20,000 Seattleites living in the neighborhood. The traffic impacts due to WSBLE will undoubtedly affect these community members, increasing commute times and complicating accessibility to their homes. Owners of residential buildings, too, will be affected, as prospective tenants may be wary to rent housing units in an area undergoing extensive construction and surrounded by traffic gridlock. Displacement of housing providers and challenged accessibility to housing by the community should likewise be analyzed in the FEIS under the various alternatives.

This broadened displacement analysis will be particularly important if Westlake Avenue fully closes for four years between Denny Street and Seventh Avenue. The disruption to vehicles and pedestrians will ripple out from this critical closure, and businesses and non-profits along Westlake Avenue through South Lake Union and beyond will undoubtedly suffer. The WSBLE should make every effort to prevent and fully mitigate the harm caused by *de facto* displacements of businesses, non-profits, and residents from WSBLE construction.

D. *The FEIS must consider the vibration and electromagnetic field impacts of the laboratory use at the Allen Institute.*

- i. *Vibration impacts to laboratory use in the Allen Institute requires analysis in the FEIS.*

The Allen Institute provides laboratory space for research and development. The DEIS describes Category 1 land uses as the most sensitive to vibration, including “buildings where vibration-sensitive research and manufacturing equipment is conducted, hospitals with vibration-sensitive equipment, and universities conducting physical research operations.” DEIS, pg. 3-8. The laboratories in the Allen Institute are Category 1 sensitive uses designed to accommodate physical research operations.

The DEIS analysis states construction vibration mitigation will consist of a Construction Vibration Control Plan which will include “[s]pecific vibration-control measures where predicted levels exceed the limits.” *Id.* pg. 7-31. This plan needs to be developed as part of the FEIS, and the “specific measures” for vibration controls during construction adjacent to the Allen Institute must be identified. With construction expected to last from 2026 to 2037 for the WSBLE, construction impacts cannot be downplayed as temporary in nature. See DEIS, Executive Summary, pg. ES-45. Multi-year disruptions to laboratory functions - critically vital uses in the South Lake Union neighborhood - are unacceptable, and it must be analyzed in the FEIS, along with site-specific mitigation techniques for construction vibration impacts. The FEIS should also provide more information about the anticipated construction durations near laboratory uses. Part of the vibration mitigation strategy needs to be a reduction in construction durations near sensitive uses.

Additional mitigation measures must also be identified for long-term operation impacts. The continuous-mat floating slab suggested as operational mitigation for vibration impacts on other sites should be studied as a mitigation option. Sound Transit employed vibration mitigation measures as part of its most recent expansion. The FEIS should include an analysis based on real-world outcomes from Sound Transit’s experience.

- ii. *Operational electromagnetic impacts must be analyzed in the FEIS.*

As noted above in the vibration discussion, Sound Transit conducted electromagnetic interruptions (“EMI”) analysis and implemented mitigation for its prior expansion. It should be able to pull from that experience and provide data on actual EMI and the success of mitigation strategies. Additionally, part of the EMI mitigation strategy needs to be a reduction in construction durations near sensitive uses.

E. *The FEIS must consider cumulative impacts due to pipeline projects and construction sequencing.*

- i. *The FEIS cumulative impact analysis must anticipate concurrent construction projects in South Lake Union.*

South Lake Union continues to grow and change, as evidenced by the many development projects underway or in the pipeline within the neighborhood. While the DEIS considered pipeline projects existing nearly a year ago in May 2021, new projects have been, and will continue to be, added to the pipeline. While many projects currently have permits or development plans in the public record, many more are still in the planning process, which will result in future permit applications in the months and years to come. These developments may require road, bike lane, and sidewalk closures that will exacerbate the effects of WSBLE construction. Though the DEIS explains the existing pipeline projects will be “completed or near completion before the WSBLE Project construction would begin,” there are and will continue to be new pipeline projects to consider. DEIS Transportation Technical Report, pg. 11-1.

Given the amount of growth South Lake Union has and continues to experience, as well as the projections in the City of Seattle’s long-range planning documents, it is both likely and foreseeable there will be construction projects in the community that will, like the WSBLE Project, require road, bike lane, and/or sidewalk closures simultaneously with WSBLE construction. The FEIS must consider this probability as the FEIS more fully considers cumulative impacts. The FEIS should account for future projects in anticipation of concurrent construction impacts with other developments by completing a survey of developable land and underutilized sites in South Lake Union and other neighborhoods along the WSBLE and then assume a certain percentage of these sites will develop during each year of WSBLE construction based on historic trends from the last five to seven-year real estate cycle. These informed assumptions should be incorporated into the cumulative impacts analysis in the FEIS.

- ii. *The FEIS cumulative impact analysis must include details on construction sequencing.*

The DEIS says, “except where noted, the sequencing of construction activities was not assessed for the Draft Environmental Impact Statement, and some of the impacts described in this section may occur simultaneously. Detailed construction planning, including sequencing, will be provided in later phases of the environmental analysis once project design is sufficiently advanced.” DEIS Transportation Technical Report, Pg. 4-114. The WSBLE’s cumulative impacts exist both in conjunction with non-WSBLE projects and with the construction sequencing of the WSBLE itself. To fully assess the cumulative impacts of the WSBLE, the FEIS must analyze when the various segments of the WSBLE will be built and how such construction sequencing will exacerbate these cumulative construction impacts.

III. Additional alternatives and mitigation measures should be considered in the FEIS.

Based on the impacts identified above, the impacts identified in the DEIS, and the impacts that will be identified in the updated analysis in the FEIS, Sound Transit should consider additional alternatives and include the following mitigation measures in the FEIS. Given the

informational inadequacies of the DEIS, note that this is in no way an exhaustive list of appropriate mitigation measures.

- Study a hybrid alignment as a new preferred alternative that incorporates the Terry Avenue alignment for Denny Station and the Harrison Street alignment for South Lake Union Station.
- Keep the Seattle Streetcar in uninterrupted operation. Analyze the Seattle Streetcar as a critical component of the transportation mitigation strategy due to the expected transit, vehicular, and pedestrian impacts.
- Mitigate the impacts the WSBLE will have on access to parks and recreation opportunities. The South Lake Union neighborhood is home to many public parks and public spaces that are important for community well-being, mental health, cohesion, and enjoyment. Traffic and construction impacts will reduce access to these important parks, and the attendant impacts and mitigation measures must be disclosed in the FEIS.
- Provide a mitigation plan to address event volumes and event demand for transit services in South Lake Union, especially as it relates to events at Seattle Center and Climate Pledge Arena.
- Prepare comprehensive detour plans and routes that minimize traffic effects. Provide additional information about wayfinding signage and messaging. Work with SDOT to ensure access is maintained to existing buildings and businesses, and consider allowing two-way movements on historically one-way streets for the construction period to minimize LOS impacts.
- Where possible, avoid impacts to bike lanes and sidewalks. Where impacts are necessary, provide safe, accessible, direct, and well-lit detour routes with clear wayfinding signage.
- Prepare a plan, including financial assistance and payment of full relocation costs in qualifying circumstances, to support businesses, non-profits, and residents negatively impacted by construction impacts. Expand the impact and mitigation analysis to include not just physically displaced businesses, non-profits, and residents but also businesses, non-profits, and residents that will experience *de facto* displacement due to the construction, traffic, and similar impacts.
- Fully analyze and mitigate for vibration and EMI impacts to the Property during construction and operation.
- Implement any other mitigation necessary to address direct and indirect WSBLE construction and operational impacts identified in the FEIS.

In summary, Washington Builders LLC supports the Denny Station at Terry Avenue, instead of Westlake Avenue, and the South Lake Union Station at Harrison Street. The FEIS should further analyze this hybrid approach in a new preferred alternative, which will be a better outcome for the entire neighborhood. We appreciate your hard work and commitment

to connecting our community through the WSBLE and look forward to continued engagement in this process.

Sincerely,

Sincerely,

A handwritten signature in black ink, appearing to read "Ada M. Healey". The signature is fluid and cursive, with the first name "Ada" being the most prominent.

Washington Builders LLC

Ada M. Healey, Chief Real Estate Officer
Vulcan LLC



April 27, 2022

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

Via electronic mail: WSBLEDEIScomments@soundtransit.org

RE: Amazon Comments to Sound Transit West Seattle to Ballard Link Extension Draft Environmental Impact Statement

Dear Ms. Swift,

I write to share Amazon's comments on Sound Transit's West Seattle to Ballard Link Extension (WSBLE) Draft Environmental Impact Statement (DEIS). Amazon's decision to create a dense, urban campus in downtown Seattle depends upon access to high-frequency transit, and our emphasis and investment in high-quality transportation infrastructure and amenities for our employees and the public, as well as our commitment to building affordable housing adjacent to light rail, speaks to our commitment to this project.

Amazon's Investment in the Puget Sound Region

Amazon is proud to be a significant investor and job creator for people of all backgrounds and skill levels in the Puget Sound region. We currently employ more than 75,000 people across our facilities in the area—including our corporate offices in Seattle and Bellevue, fulfillment centers in Kent, Sumner, and Dupont, our air hub at SeaTac airport, and Project Kuiper's R&D facility in Redmond.

In 2010, we moved to our first building in Seattle's South Lake Union neighborhood, making the conscious decision to build an urban campus in the city's downtown and helping to transform an entire neighborhood. We have long believed in the benefits of downtown offices for our employees, creating dense and connected urban campuses rather than isolated office parks in the suburbs. This approach helps us recruit great talent and stitch ourselves into the local community.

Since our decision to invest in South Lake Union, we have created more than 50,000 direct jobs and invested over \$4.5 billion in Seattle alone—and we estimate that these investments have contributed to the creation of an additional 244,000 jobs on top of our direct hires.

Amazon's Commitment to Transit

One of the often-overlooked benefits to creating dense, urban campuses are the commuter benefits this type of office environment provides. Instead of long drives to the suburbs to get to and from work, employees can instead opt to take transit, walk, or bike to work. This benefits our planet by reducing greenhouse gas emissions as a result of single-occupant vehicle (SOV) trips, and reduces traffic congestion for everyone.

We are proud of the investments we have made in our employee commute programs to reduce SOV trips, including providing free ORCA cards to all employees in Seattle, investing in public infrastructure like the Seattle Streetcar, and building protected bike lanes adjacent to our buildings. We also recently launched a new bike benefit for employees, allowing employees to receive a subsidy to cover associated bike-related expenses, such as bike share, bike maintenance, and even leasing of e-bikes. As a result of our efforts, before the pandemic, roughly 75% of our employees in Seattle commute to work via non-drive alone methods, with 50% of employees taking public transit or carpooling options, and more than 20% of our employees walking or biking to work.

Amazon recognizes the value of a well-connected regional transit system to move everyone, and have invested in campaigns and initiatives in the Puget Sound region to build out our transit infrastructure. Amazon was a top contributor to Mass Transit Now, the campaign promoting the Sound Transit 3 campaign, which due to its passage in 2016, has allowed this WSBLE project to move forward. Amazon supported similar transit campaigns to expand transit access across Seattle and King County in 2014, 2015, and helped defeat Initiative 976 in 2019, which would have severely cut funding to Sound Transit – and this project – had it passed. Fortunately, due to the efforts of a coalition of business and labor, we defeated this measure and allowed Sound Transit to continue serving riders around the region for decades to come. Our commitment to transit is well established for the benefits it provides our employees and the Puget Sound region as a whole.

Amazon also believes in the transformative power of transit-oriented development, and the opportunities that affordable housing adjacent to transit have on our community. Amazon's Housing Equity Fund – launched in January 2021 – is a more than \$2 billion commitment to preserve existing housing and create inclusive housing developments through low-rate loans and grants to housing partners. As part of the Housing Equity Fund, in June 2021, Amazon announced a \$100 million commitment to Sound Transit to accelerate the creation of up to 1,200 new affordable housing units on Sound Transit surplus properties near light rail stations across the Puget Sound region. In March 2022, we announced the first two projects as part of this partnership with Sound Transit: BRIDGE Housing's project to create 233 new construction affordable apartments at the Spring District/120th Station in Bellevue, and Mercy Housing Northwest's project to create 85 new construction affordable apartments at the Angle Lake Station in the City of SeaTac. When successful, TOD has a range of benefits, including greater economic activity, reduced traffic congestion and associated environmental benefits, and a

strengthened, more resilient labor force, and we are proud to invest in new ways to unlock the power of affordable housing near light rail.

Amazon's Comments to WSBLE DEIS

Amazon appreciates the extensive research conducted by Sound Transit and other partner agencies as part of the WSBLE DEIS. As the agency conducts further analysis as it prepares its final environmental impact statement, and as the Board considers a preferred alternative, Amazon offers the following comments:

Denny Station: The Denny Station will be located in one of the fastest growing areas of Seattle and the Puget Sound region, and this station must serve this growing and active portion of our city while allowing the existing transportation and transit network to operate during construction. As mentioned above, Amazon employees rely heavily on transit and other non-motorized modes of transportation for commuting to and from work, frequently using transit along Westlake Avenue, such as the RapidRide C line. Our employees also frequently walk or use the Seattle Streetcar on Westlake Avenue to get to and from our offices spread across the Denny Regrade and South Lake Union neighborhoods. The multi-year closure of Westlake Avenue anticipated by construction of the station location in the preferred (5th/Harrison) alternative, without a feasible mitigation or detour routes for traffic and transit displaced off of Westlake Ave., would make traffic in the vicinity around Westlake Ave. much worse. Further, in addition to the full four-year closure of Westlake Ave., the multi-year full- or partial-closures of 7th Ave., 8th Ave., and Blanchard St. would severely impact access to parking garages, loading docks, and building entrances to Amazon's Doppler, Day 1, and re:Invent buildings, in which more than 15,000 Amazon employees and vendors work. These roadway closures would also severely impact ground-level retail establishments, child care facilities, and nearby residences, and the South Lake Union Whole Foods Market location.

Sound Transit should thoroughly study the station location presented in the alternative (6th/Mercer) alignment. A station located along Terry Ave. N. would avoid much of the disruption to South Lake Union and Downtown transit network and avoid many of the ground level impacts to adjacent businesses and retail establishments. Sound Transit can improve upon this already superior alternative by evaluating whether construction can be staged in a way to avoid closures of Denny Way – one of Seattle's main east-west corridors, as well as closures of the Seattle Streetcar at Terry Ave. N. and Thomas St.

If the Westlake Station location proposed in the preferred alternative is carried forward, we request that Sound Transit conduct extensive additional study to determine solutions to minimize closures to Westlake Ave., 7th Ave., 8th Ave., and Blanchard St., and provide commensurate transit routes and traffic detour alternatives.

Westlake Station: The preferred alternative (5th/Harrison alignment) anticipates entrances to the Westlake Station in the vicinity of 4th & Pine, which will have direct impacts on surrounding ground-level business, retail establishments, offices, and park space at Westlake

Park. In particular, the two- to six-year roadway closures of Pine Street (between 4th Ave. and 5th Ave.) and 4th Ave. (between Pine St. and Olive Way) are significant, and proper mitigation to surrounding businesses and retail establishments must be considered. Further, pedestrian access to offices (including access to Amazon's Ivy building, located mid-block on 4th Ave. between Pine St. and Olive Way) and ground-level retail businesses must be preserved and mitigated against to ensure these offices businesses remain active to the greatest extent possible.

Additionally, Sound Transit should also study the indirect impacts of construction of the Westlake station in this location. Public safety in the 3rd Ave. and Pine St. vicinity has been an everlasting – and recently renewed – concern for nearby businesses, tourists, residents, and workers. Recent gun violence and other violent crime in the area are hampering efforts to improve this area of downtown, and the progress made to date by Mayor Harrell and the Seattle Police Department in this regard should not be stunted as a result of multi-year station construction. Sound Transit must study the impacts that station construction would have on the public safety efforts in this area, in coordination with Seattle Department of Transportation, Seattle Police Department, Seattle Department of Neighborhoods, King County Metro, and the King County Sheriff's Office. Sound Transit should fully explore and compare/contrast the direct and indirect impacts with the station location along the alternative (6th/Mercer) alignment.

On behalf of Amazon, I would like to express my sincere thanks to the Sound Transit Board of Directors and staff for your work preparing our region for the next generation of transit service through downtown Seattle. With additional input based on the considerations offered in this letter, and with the collective input of other downtown stakeholders, we look forward to working together to deliver the West Seattle to Ballard Link Extension. Should staff have any questions or would like to discuss these comments further, please contact Jared Axelrod at jaxelrod@amazon.com.

Sincerely,



John Schoettler
Vice President, Global Real Estate and Facilities

CC:

Sound Transit Board of Directors
Peter Rogoff, CEO, Sound Transit
Bruce Harrell, Mayor of Seattle
Debora Juarez, Council President, Seattle City Council
Marshall Foster, Director, Office of the Waterfront and Civic Projects and Designated Representative to Sound Transit's ST3 Program

Sound Transit Projects

Details	Communication
#498242	March 8th, 2022
Date Recieved: 3/8/2022	American Hotel Building LLC 520 S. King St. Seattle, WA 98104-2834
Created by: Tay Stone	RE: AHB Response to West Seattle and Ballard Link Extensions
Audience: General Public	Dear Sound Transit:
Reach:	We are providing comments on the Draft EIS for the West Seattle and Ballard Link Extensions, particularly as it relates to the line and stations in the International District (ID). I am the managing member of the American Hotel, which is a historic four-story building of approximately 34,000 square feet at 520 South King Street and 6th Avenue South. Our building has sixteen locally-owned and operated tenants, including five food and beverage (F&B) operations and the 289-bed Hostelling International Seattle at the American Hotel (only one of two remaining hostels in Seattle), which we own and operate ourselves. To minimize the impact to our building and businesses, we strongly prefer the 4th Avenue options over the 5th Avenue ones.
Participation:	
Engagement: 1	
Source: Email	We like the 4th Avenue options as their construction won't directly affect us in terms of vibration, noise, access, and displacement (either temporary or permanent). Our first choice would be the 4th Deep option and second choice would be the 4th Shallow. All of the 5th Avenue options are highly problematic for our building and businesses. If we had to prioritize, we'd prefer in order: 5th Deep, 5th Shallow, and 5th Shallow Diagonal.
Assigned division: Outreach	
Category:	All three 5th Avenue options would be highly disruptive and likely catastrophic to the businesses in our building. The construction vibration, noise, and lack of access would mean that customers couldn't get to our building by vehicle and sometimes even easily or directly by foot. Online reviews for our hostel would note the construction, which would dissuade lodgers. For those who would stay, they would be disturbed by construction next door (and under our building in the 5th Shallow option). All of our major tenants are unable to temporarily move to another location. How do you move a hostel or restaurant temporarily?
Project Phase: Planning	
Project Segment:	Thank you for considering our view of the situation. You can reach me at scott@americanhotelseattle.com or 206-999-5088 with questions or if you'd like to discuss.
Environmental phase: Draft EIS	Regards, Scott E. Shapiro Managing Member American Hotel Building LLC American Hotel Management LLC (dba Hostelling International Seattle) www.americanhotelseattle.com



ALEXANDRIA®

April 27, 2022

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

via email WSBLEDEIScomments@soundtransit.org

Re: 400 Dexter - Comments on the West Seattle and Ballard Link Extension Draft Environmental Impact Statement

Dear Ms. Swift,

This comment letter is submitted in response to the West Seattle and Ballard Link Extension (“**WSBLE**”) Draft Environmental Impact Statement (the “**DEIS**”). ARE Seattle No. 45 Owner, LLC, an affiliate of Alexandria Real Estate Equities (“**ARE**”), owns the building at 400 Dexter that will be impacted by the WSBLE (APNs 1988201400, 1988201390, and 1988201380) (the “**Building**”). Most of the Building is occupied by laboratory space, which supports highly sensitive bioscience research.

ARE supports the preferred Alternative DT-1 in South Lake Union (“**SLU**”), which would place the light rail tunnel immediately south of the Building along Harrison Street and place a light rail station on the block west of the Building. This letter explains why Alternative DT-1 should be preferred because of its reduced impacts compared to DT-2, and identifies deficiencies in the DEIS impacts analysis, including in the construction and operational impacts analysis. Last, this letter identifies additional mitigation measures that should be included in the Final Environmental Impact Statement (the “**FEIS**”).

1. Sound Transit Should Select Alternative DT-1 in South Lake Union and Avoid a Mercer Street Station.

Sound Transit should select Alternative DT-1 in SLU and avoid a Mercer Street station. Not only will the Harrison Street station yield much higher ridership levels, the Harrison Street station results in fewer adverse impacts on the community, as discussed in Sections 2 of this letter.

The Harrison Street station better serves the needs of the SLU community, including the employees in the Building. As shown in Table 3-31 of the Transportation Technical Report,

the preferred DT-1 Harrison Street alignment for the SLU station would generate nearly twice the ridership of the DT-2 Mercer Street alignment. The Harrison Street station is closer to the heart of SLU and serves as a more convenient location for riders, while the proposed Mercer Street station is west of Aurora Avenue, effectively putting it outside SLU. Furthermore, while all crosswalks surrounding the Harrison Street station have capacity to handle the anticipated increased pedestrian usage, the same is not true for the Mercer Street alignment. DEIS Transportation Technical Report, pgs. 6-40 and 6-41.

ARE strongly urges Sound Transit to adopt the Alternative DT-1 alignment as the preferred alternative for the SLU station.

2. Construction and Operational Impacts Require Further Analysis in the FEIS.

The DEIS analysis must provide additional information on vibration, traffic, pedestrian, and economic impacts.

a. Vibration Impacts to the Building

As noted above, the Building provides laboratory space for life sciences research. The DEIS describes Category 1 land uses as the most sensitive to vibration, including “buildings where vibration-sensitive research and manufacturing equipment is conducted, hospitals with vibration-sensitive equipment, and universities conducting physical research operations.” DEIS, pg. 3-8. The Building was measured for vibration impacts in October 2019. DEIS, Appendix N.3H.

Now that recent light rail expansions are open and operational, we would encourage Sound Transit to collect actual vibration data to test real-world impacts and confirm the conclusions of the vibration analysis conducted on the building in 2019. With construction occurring so close to the Building for both the tunnel and the Harrison Street station, the FEIS should account for an extended construction duration and identify site-specific vibration mitigation measures.

Additional mitigation measures must also be identified for operational impacts. The continuous-mat floating slab suggested as operational mitigation for vibration impacts on other sites should be studied as a mitigation option adjacent to the Building, in addition to other physical solutions to create a vibration barrier between the rail tunnel and the Building.

b. Operational Electromagnetic Field Impacts Must be Analyzed in the FEIS

In addition to uses sensitive to vibration, laboratories in the Building contain uses and equipment sensitive to electromagnetic field (“**EMF**”) disruptions. The DEIS identifies the Building as having EMF sensitivities. DEIS, Section 4.3.13.1. The analysis concludes there will be no impact, and no mitigation is required. Like our comments on potential vibration

impacts, we would encourage Sound Transit to check its conclusions in the DEIS against the real-world conditions and measured EMF disruptions along the newly operating lines.

c. Vehicular and Transit Impacts Due to Roadway Closures

For Alternative DT-2, the most significant impact involves the closure of Mercer Street. Mercer Street is a heavily traveled roadway, generating between 18,100 and 35,000 trips per day. DEIS Transportation Technical Report, Table 4-35. It is the main arterial connecting Seattle's westside neighborhoods to I-5. Despite this, Alternative DT-2 would close lanes on Mercer Street for 3.5 years, negatively affecting congestion and limiting access to and from SLU and the region more broadly. *Id.*, pg. N.1E-27. This Mercer Street closure would impact up to 100 buses per hour, including RapidRide and Express routes. *Id.*, Table 3-37. "The partial closure of Mercer Street would affect three Metro routes and could impact trolley bus operations, necessitating short-term, off-wire bus service or temporarily shifting the overhead trolley wire system to maintain operations." *Id.*, pg. 3-55. Partial closure of Mercer Street will undoubtedly affect traffic patterns, increase congestion, and fundamentally alter accessibility in and to SLU. The ripple effects of these changes must be analyzed in the FEIS due to the importance of Mercer Street to the entire area's transportation operations.

For Alternative DT-1, Harrison Street closures will directly impact the Building. Harrison Street would be partially closed for 1.5 years between 8th Avenue N and Dexter Avenue N, including the intersection of Harrison Street and Dexter Avenue N. DEIS, Transportation Technical Report, pg. N.1E-25-26. Harrison Street west of Dexter Avenue N will be fully closed for four years. *Id.* The FEIS should contain more information about what a partial closure will look like along Harrison Street adjacent to the Building. What are the expected extents and times of closures? Where will traffic detour? Will detours be necessary during the partial closures? It will be critical to maintain uninterrupted access to the Building's entrance on Dexter Avenue N and to the Building's parking garage from the alley during the partial and full closures around the Building. We would request further analysis in the FEIS to confirm continuation of access.

a. Pedestrian Impacts Due to Sidewalk and Bicycle Lane Closures

In general, the FEIS must also include more information about anticipated sidewalk closures during construction. The introduction to the "Construction-Related Roadway Modifications" attachment to the Transportation Technical Report states, "[r]oadway closures could also include short-term or long-term closure of sidewalks. Extent and duration of sidewalk closures will be coordinated with the City of Seattle in later phases of project development." DEIS Transportation Technical Report, pg. N.1E-1. With partial closures of Harrison Street immediately adjacent to the Building, the FEIS must analyze and disclose anticipated pedestrian and bicycle routes to the Building entrances during construction. This analysis cannot be put off until later; it must be captured in the FEIS.

3. **Overall DEIS Concerns**

b. Cumulative Effects

As noted above, the pipeline projects analyzed as part of the cumulative effects analysis were taken from May 2021. That information will be more than a year stale by the time the FEIS is issued, and this project list should be updated for the FEIS analysis.

The FEIS should also acknowledge that future, simultaneous construction is likely. Those impacts are downplayed in the cumulative effects analysis in the DEIS, which states, “[c]onstruction in or near roadways typically requires lane closures, detours, and traffic delays. Interactions among two or more concurrent construction projects can intensify these impacts. *However, most reasonably foreseeable future actions that can be reliably identified at present would be completed or near completion before the WSBLE Project construction would begin.*” DEIS Transportation Technical Report, Pg. 11-1 (emphasis added). Seattle’s construction pipeline will not be frozen, and it is reasonably foreseeable based on adopted long-range planning documents that there will be simultaneous construction projects that will require additional lane and sidewalk closures. The FEIS analysis needs to account for future projects that may be in development at the same time as the WSBLE.

c. Construction Sequencing

The cumulative impacts analysis discussed above focuses on WSBLE impacts combined with other project impacts, but the DEIS also inadequately discloses the WSBLE’s own cumulative impacts due to the lack of information on segment construction sequencing. The DEIS states, “[e]xcept where noted, the sequencing of construction activities was not assessed for the Draft Environmental Impact Statement, and some of the impacts described in this section may occur simultaneously. Detailed construction planning, including sequencing, will be provided in later phases of the environmental analysis once project design is sufficiently advanced.” DEIS Transportation Technical Report, Pg. 4-114. This updated analysis must be included in the FEIS to allow an adequate evaluation of the WSBLE project impacts.

d. Economic Impacts from Business Disruptions

SLU’s businesses will be affected by traffic impacts during and after construction of the WSBLE. The DEIS discloses business displacement when Sound Transit directly takes over a property, but fails to analyze how businesses will be affected where new traffic impacts and sidewalk closures affect access to their businesses. *See* DEIS, Sections 4.3.1.3.3 and 4.3.3.3.4. Traffic impacts that make businesses hard to reach and limit patronage can result in a *de facto* displacement of the business. To fully understand how each alternative will affect the South Lake Union community, the FEIS must analyze business displacements due to traffic impacts under the various alternatives.

4. Suggested Mitigation for Consideration in the FEIS

Based on the impacts identified above and the impacts identified in the DEIS, ARE would encourage consideration of the following mitigation measures in the FEIS.

- Consider physical mitigation measures to reduce potential vibration impacts to the Building during construction and operations.

- Prepare comprehensive detour plans and routes that minimize traffic impacts around the Building. Ensure uninterrupted vehicular, pedestrian, and cyclist access to the Building. Provide additional information about wayfinding signage and messaging for pedestrians and bicycles.
- Where possible, avoid impacts to bike lanes and sidewalks. Where impacts are necessary, provide a safe, accessible, well-lit detour routes with clear wayfinding signage.
- Prepare a plan, including financial assistance, to support businesses (including building tenants) negatively impacted by construction impacts. Expand the mitigation analysis to include not just wholly closed and physically displaced businesses, but also businesses that will experience *de facto* displacement from construction impacts, including the closure of Harrison Street adjacent to the Building.

In conclusion, even though the Building will be impacted by the significant construction interruptions, ARE strongly urges Sound Transit to adopt the DT-1 alignment and avoid a station on Mercer Street. We look forward to continued engagement in the WSBLE EIS process and would be happy to meet with Sound Transit.

Sincerely,

ARE-SEATTLE NO. 45 OWNER, LLC,
a Delaware limited liability company

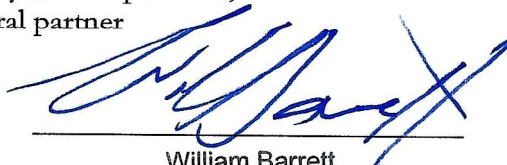
By: ARE-Seattle No. 45 JV, LLC,
a Delaware limited liability company,
managing member

By: ARE-Seattle No. 45 MM, LLC,
a Delaware limited liability company,
managing member

By: Alexandria Real Estate Equities, L.P.,
a Delaware limited partnership,
managing member

By: ARE-QRS Corp.,
a Maryland corporation,
general partner

By:



William Barrett
Vice President
Real Estate Legal Affairs



ALEXANDRIA.

April 27, 2022

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

via email WSBLEDEIScomments@soundtransit.org

Re: 601 Dexter Avenue N - Comments on the West Seattle and Ballard Link Extension
Draft Environmental Impact Statement

Dear Ms. Swift,

This comment letter is submitted in response to the West Seattle and Ballard Link Extension (“**WSBLE**”) Draft Environmental Impact Statement (the “**DEIS**”). ARE-Seattle No. 32, LLC, an affiliate of Alexandria Real Estate Equities (“**ARE**”), owns the parcels at 601 Dexter Avenue N that will be impacted by the WSBLE (APN 2249000100) (the “**Site**”). Located in the heart of the South Lake Union Mercer Corridor, the 0.54-acre Site is bounded by Aurora Avenue, Mercer Street, Dexter Avenue N, and an alley. As discussed in detail below, ARE is actively pursuing entitlements for approximately 274,668 square feet of life sciences laboratory and office space on the Site (the “**Proposed Project**”).

ARE has serious concerns about the impacts of Alternative DT-2 in South Lake Union (“**SLU**”), which would place a light rail tunnel directly beneath the entire Site, and about the level of analysis contained in the DEIS. Most significantly, the DEIS fails to acknowledge the sensitive laboratory use that will exist at the Site. This letter clarifies the Proposed Project plans for the Site, explains why Alternative DT-1 should be preferred because of its reduced impacts compared to DT-2, and identifies deficiencies in the DEIS impacts analysis, including in the construction and operational impacts analysis. Last, this letter identifies additional mitigation measures that should be included in the Final Environmental Impact Statement (the “**FEIS**”).

1. FEIS Must Consider the Proposed Project in its Analysis.

The DEIS evaluation of pipeline development projects is dated, incorrect, and incomplete, and the FEIS requires a new examination of pipeline projects. The DEIS describes the pipeline projects considered in the DEIS, however, it notes the information is from May 2021, nearly a year ago. DEIS, Appendix K. Aside from providing unreasonably stale information, Appendix K labels the Proposed Project a residential project, which is incorrect, and then it describes it as a commercial office project, which is also incorrect. *Id.*, Line 77, pg. K-24. The proposed use is laboratory and supporting office for life sciences research and development. This is a sensitive use, with very little tolerance for vibration or electromagnetic field disruptions. It is meaningfully different from

traditional office use. This failure to accurately capture and analyze the Proposed Project as part of the background condition for the SLU renders the DEIS analysis inadequate.

ARE is happy to share project documents and technical plans, which are under active review by the Seattle Department of Construction and Inspections (“SDCI”) pursuant to Master Use Permit (“MUP”) No. 3035375-LU. As reflected in the Proposed Project plans on record with SDCI, the 601 Dexter building will be approximately 274,668 square feet of laboratory and supporting office use. The Proposed Project includes three to four levels of below-grade laboratory space and parking with approximately 182 parking stalls located up to 53 feet below grade. The Proposed Project expects to complete SDCI’s design review process on May 4, 2022. It should receive its MUP later in 2022. Construction is expected to commence in Q1 2023 with completion expected in Q1 2025. This means the building will be complete and operating as a laboratory before Sound Transit commences WSBL construction.

In short, the FEIS must provide a new, updated, and more in-depth analysis of pipeline projects, including the Proposed Project, assuming it will be constructed when the WSBL construction begins. Not only does the Proposed Project include a sensitive laboratory use, which must be analyzed in the FEIS, but the Proposed Project’s physical design and traffic, pedestrian, and loading volumes must also be accounted for in the FEIS. This is true for all Alternatives, but particularly if Sound Transit proceeds with Alternative DT-2 in South Lake Union.

2. Sound Transit Should Select Alternative DT-1 in South Lake Union and Avoid a Mercer Street Station.

Sound Transit should select Alternative DT-1 in SLU and avoid a Mercer Street station. Not only will the Harrison Street station yield much higher ridership levels, the Harrison Street station results in fewer adverse impacts on the community, as discussed in Sections 3 of this letter.

The Harrison Street station better serves the needs of the SLU community. As shown in Table 3-31 of the Transportation Technical Report, the Preferred DT-1 Harrison Street alignment for the SLU station would generate nearly twice the ridership of the DT-2 Mercer Street alignment. The Harrison Street station is closer to the heart of SLU and serves as a more convenient location for riders, while the proposed Mercer Street station is west of Aurora Avenue, effectively putting it outside SLU. Furthermore, while all crosswalks surrounding the Harrison Street station have capacity to handle the anticipated increased pedestrian usage, the same is not true for the Mercer Street alignment. DEIS Transportation Technical Report, pgs. 6-40 and 6-41.

ARE strongly urges Sound Transit to adopt the Alternative DT-1 alignment as the preferred alternative for the SLU station.

3. Construction and Operational Impacts of DT-2 are Significant and Require Further Analysis in the FEIS.

The DEIS construction and operations analysis does not sufficiently disclose impacts of Alternative DT-2 in SLU generally and on the Proposed Project. Alternative DT-2 would place a light rail tunnel directly beneath the Site, which will cause impacts described below that are not adequately considered or disclosed in the DEIS. The DEIS analysis must provide additional information on vibration, electromagnetic field interruptions, physical constraints, traffic, pedestrian, and economic impacts to the Site and on SLU from the WSBL construction.

a. Vibration Impacts to Sensitive Laboratory Uses in the Proposed Project

As noted above, the Proposed Project provides laboratory space for life sciences research. The DEIS describes Category 1 land uses as the most sensitive to vibration, including “buildings where vibration-sensitive research and manufacturing equipment is conducted, hospitals with vibration-sensitive equipment, and universities conducting physical research operations.” DEIS, pg. 3-8. The life sciences biomedical research contemplated at the Site’s laboratories are a Category 1 sensitive use and should be considered as such in the analysis.

The methodology for assessing vibration impacts in the DEIS was to collect and average vibration data for West Seattle, Downtown, and Interbay/Ballard. DEIS Noise and Vibration Technical Report, pg. 4-8. For existing Category 1 buildings, site-specific data was collected and analyzed. *Id.*, pgs. 4-10 and 5-11. It appears the DEIS analysis did not account for the pipeline Category 1 sensitive uses on the Site, despite the Site’s active permits and available plans.

The closest analogous analysis in the DEIS is for the University of Washington (“UW”) Medicine SLU Campus, which the DEIS notes is 87 feet from the Alternative DT-2 line. DEIS Noise and Vibration Technical Report, Table 6-14. The predicted vibration level for UW was found to exceed the vibration limit for sensitive uses during construction and operation. *Id.* at Table 6-14 and 6-25. This information is useful, yet concerning, because the Site will contain similar sensitive laboratory uses, but will be located much closer to the light rail line construction and operation. Accordingly, ARE has significant concerns about the impact of vibration impacts to the Proposed Project should Sound Transit pursue the Mercer Street Alternative DT-2 station alignment. The FEIS must adequately disclose these potential vibration impacts and identify appropriate mitigation measures.

The DEIS analysis states construction vibration mitigation will consist of a Construction Vibration Control Plan which will include “[s]pecific vibration-control measures where predicted levels exceed the limits.” *Id.* pg. 7-31. This plan needs to be developed as part of the FEIS, and the “specific measures” for vibration controls during construction adjacent to the Site must be identified. If UW’s sensitive use 87 feet away from the Alternative DT-2 construction will have significant vibration impacts, then a sensitive use sitting on top of the construction will certainly have significant adverse vibration impacts. With construction expected to last from 2026 to 2037, construction impacts cannot be downplayed as temporary in nature. *See* DEIS, Executive Summary, pg. ES-45. Multi-year disruptions to vital laboratory functions will make the Proposed Project buildings inoperable and un-leasable for its intended use. This is an unacceptable outcome, and it must be analyzed in the FEIS, along with site-specific mitigation techniques for construction vibration impacts.

Additional mitigation measures must also be identified for operation impacts. The continuous-mat floating slab suggested as operational mitigation for vibration impacts on other sites should be studied as a mitigation option, in addition to other physical solutions to create a vibration barrier between the rail tunnel and the Proposed Project buildings. Ultimately, the best mitigation measure would be avoidance of the operational impact altogether by selecting the Alternative DT-1 Harrison Street SLU station alignment.

b. Operational Electromagnetic Field Impacts Must be Analyzed in the FEIS

In addition to uses sensitive to vibration, laboratories proposed at the Site will also contain uses and equipment sensitive to electromagnetic field (“EMF”) disruptions. The DEIS identifies other

laboratories in SLU, including UW Medicine, with EMF sensitivities, but the analysis does not identify the Site and its laboratory use. DEIS, Section 4.3.13.1. Additionally, the EMF analysis does not assume any laboratory space below-grade, which is a possibility in the Proposed Project. The analysis concludes there will be no impact, and no mitigation is required, but this analysis must be updated in the FEIS to account for the Site's laboratories, which will be located directly over the Alternative DT-2 line.

c. Proposed Tunnel Depth and Constructability Considerations

The conceptual plans available with the DEIS do not provide adequate information about the tunnel depth. The FEIS must account for the Proposed Project's parking garage and utility infrastructure. The FEIS should also study the water table and other constructability considerations, which will increase the cost of Alternative DT-2.

d. Vehicular and Transit Impacts Due to Roadway Closures

Mercer Street is a heavily traveled roadway, generating between 18,100 and 35,000 trips per day. DEIS Transportation Technical Report, Table 4-35. It is the main arterial connecting Seattle's westside neighborhoods to I-5. Despite this, Alternative DT-2 would close lanes on Mercer Street for 3.5 years, negatively affecting congestion and limiting access to and from SLU and the region more broadly. *Id.*, pg. N.1E-27. This Mercer Street closure would impact up to 100 buses per hour, including RapidRide and Express routes. *Id.*, Table 3-37. "The partial closure of Mercer Street would affect three Metro routes and could impact trolley bus operations, necessitating short-term, off-wire bus service or temporarily shifting the overhead trolley wire system to maintain operations." *Id.*, pg. 3-55. Partial closure of Mercer Street will undoubtedly affect traffic patterns, increase congestion, and fundamentally alter accessibility in and to SLU. The ripple effects of these changes must be analyzed in the FEIS due to the importance of Mercer Street to the entire area's transportation operations.

e. Pedestrian Impacts at Mercer Station

The operational pedestrian environment is much worse at the Alternative DT-2 Mercer Street station than the DT-1 Harrison Street station. The crosswalk across Taylor Avenue North at the Mercer Street station is expected to operate at LOS F. DEIS Transportation Technical Report, pg. 6-41. If Sound Transit selects the Mercer Street station alignment for the South Lake Union station, then the FEIS must further study the potential safety and traffic impacts associated with pedestrians using a crosswalk operating at LOS F.

4. Overall DEIS Concerns

a. Cumulative Effects

As noted above, the pipeline projects analyzed as part of the cumulative effects analysis were taken from May 2021. That information will be more than a year stale by the time the FEIS is issued, and this project list should be updated for the FEIS analysis.

The FEIS should also acknowledge that future, simultaneous construction is likely. Those impacts are downplayed in the cumulative effects analysis in the DEIS, which states, "[c]onstruction in or near roadways typically requires lane closures, detours, and traffic delays. Interactions among two or more concurrent construction projects can intensify these impacts. *However, most reasonably foreseeable future actions that can be reliably identified at present would be completed or near completion before the WSBLE*

Project construction would begin.” DEIS Transportation Technical Report, Pg. 11-1 (emphasis added). Seattle’s construction pipeline will not be frozen, and it is reasonably foreseeable based on adopted long-range planning documents that there will be simultaneous construction projects that will require additional lane and sidewalk closures. The FEIS analysis needs to account for future projects that may be in development at the same time as the WSBLE.

b. Construction Sequencing

The cumulative impacts analysis discussed above focuses on WSBLE impacts combined with other project impacts, but the DEIS also inadequately discloses the WSBLE’s own cumulative impacts due to the lack of information on segment construction sequencing. The DEIS states, “[e]xcept where noted, the sequencing of construction activities was not assessed for the Draft Environmental Impact Statement, and some of the impacts described in this section may occur simultaneously. Detailed construction planning, including sequencing, will be provided in later phases of the environmental analysis once project design is sufficiently advanced.” DEIS Transportation Technical Report, Pg. 4-114. This updated analysis must be included in the FEIS to allow an adequate evaluation of the WSBLE project impacts.

c. Pedestrian Impacts Due to Sidewalk and Bicycle Lane Closures

In general, the FEIS must also include more information about anticipated sidewalk closures during construction. The introduction to the “Construction-Related Roadway Modifications” attachment to the Transportation Technical Report states, “[r]oadway closures could also include short-term or long-term closure of sidewalks. Extent and duration of sidewalk closures will be coordinated with the City of Seattle in later phases of project development.” DEIS Transportation Technical Report, pg. N.1E-1.

Sidewalk closures are a critical component of the environmental analysis. This information cannot be coordinated and disclosed later. The pedestrian impact analysis must also account for pipeline projects, like the Proposed Project, as it models pedestrian and bicyclist volumes and patterns. If there is not enough specificity around sidewalk and bike lane closures, then the FEIS should assume a worst-case analysis and analyze sidewalk and bike lane closures along all identified roadway closures.

d. Economic Impacts from Business Disruptions

SLU’s businesses will be affected by traffic impacts during and after construction of the WSBLE. The DEIS discloses business displacement when Sound Transit directly takes over a property, but fails to analyze how businesses will be affected where new traffic impacts and sidewalk closures affect access to their businesses. *See* DEIS, Sections 4.3.1.3.3 and 4.3.3.3.4. Traffic impacts that make businesses hard to reach and limit patronage can result in a *de facto* displacement of the business. To fully understand how each alternative will affect the South Lake Union community, the FEIS must analyze business displacements due to traffic impacts under the various alternatives.

5. Suggested Mitigation for Consideration in the FEIS

Based on the impacts identified above and the impacts identified in the DEIS, ARE would encourage consideration of the following mitigation measures in the FEIS. These mitigation measures are critical if Alternative DT-2 is selected as the preferred alternative.

- Prepare a Site-specific vibration mitigation plan to allow uninterrupted life sciences laboratory work in the Proposed Project during construction and operation.
- Prepare a Site-specific electromagnetic field analysis with necessary mitigation identified in the analysis.
- Prepare comprehensive detour plans and routes that minimize traffic impacts on the Mercer Corridor. Provide additional information about wayfinding signage and messaging for pedestrians and bicycles.
- Where possible, avoid impacts to bike lanes and sidewalks. Where impacts are necessary, provide a safe, accessible, well-lit detour routes with clear wayfinding signage.
- Prepare a plan, including financial assistance, to support businesses (including building tenants) negatively impacted by construction impacts. Expand the mitigation analysis to include not just wholly closed and physically displaced businesses, but also businesses that will experience *de facto* displacement from construction impacts.

In conclusion, ARE strongly urges Sound Transit to adopt the DT-1 alignment and avoid a station on Mercer Street. The Harrison Street SLU station will be more functional and have less impact on the neighborhood. Sound Transit should also include additional analysis in the FEIS related to potential impacts to the Site as identified above. We look forward to continued engagement in the WSBLE EIS process and would be happy to meet with Sound Transit to share additional information about the Proposed Project on the Site.

Sincerely,

ARE-SEATTLE NO. 32, LLC,
a Delaware limited liability company

By: ALEXANDRIA REAL ESTATE EQUITIES, L.P.,
a Delaware limited partnership,
managing member

By: ARE-QRS CORP.,
a Maryland corporation,
general partner

By:



William Barrett
Vice President
Real Estate Legal Affairs



ALEXANDRIA.

April 27, 2022

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

via email WSBLEDEIScomments@soundtransit.org

Re: 701 Dexter Avenue N - Comments on the West Seattle and Ballard Link Extension
Draft Environmental Impact Statement

Dear Ms. Swift,

This comment letter is submitted in response to the West Seattle and Ballard Link Extension (“**WSBLE**”) Draft Environmental Impact Statement (the “**DEIS**”). ARE-Seattle No. 33 LLC, an affiliate of Alexandria Real Estate Equities (“**ARE**”), owns the parcels at 701 Dexter Avenue N that will be impacted by the WSBLE (APN 2249000245) (the “**Site**”). Located in the heart of the South Lake Union Mercer Corridor, the 0.62-acre Site is bounded by Aurora Avenue, Roy Street, and Dexter Avenue N. As discussed in detail below, ARE is currently constructing approximately 233,999 square feet of life sciences laboratory and office space on the Site (the “**Proposed Project**”).

ARE has serious concerns about the impacts of Alternative DT-2 in South Lake Union (“**SLU**”), which would place a light rail tunnel one block south of the Site, and about the level of analysis contained in the DEIS. Most significantly, the DEIS fails to acknowledge the sensitive laboratory use that will exist at the Site. This letter clarifies the Proposed Project plans for the Site, explains why Alternative DT-1 should be preferred because of its reduced impacts compared to DT-2, and identifies deficiencies in the DEIS impacts analysis, including in the construction and operational impacts analysis. Last, this letter identifies additional mitigation measures that should be included in the Final Environmental Impact Statement (the “**FEIS**”).

1. FEIS Must Consider the Proposed Project in its Analysis.

ARE is happy to share project documents and technical plans, which have been approved by the Seattle Department of Construction and Inspections (“**SDCI**”) pursuant to Master Use Permit (“**MUP**”) No. 3033100-LU. As reflected in the Proposed Project plans on record with SDCI, the 701 Dexter building will be approximately 233,999 square feet of laboratory and supporting office use. The Proposed Project includes four levels of below-grade parking with approximately 260 parking stalls. The MUP issued on July 8, 2021. Construction commenced in late 2021, with completion expected in early 2024. This means the building will be complete and operating as a laboratory before Sound Transit commences WSBLE construction.

In short, the FEIS must provide a new, updated, and more in-depth analysis of pipeline projects, including the Proposed Project, assuming it will be constructed when the WSBLE construction begins. Not only does the Proposed Project include a sensitive laboratory use, which must be analyzed in the FEIS, but the Proposed Project's physical design and traffic, pedestrian, and loading volumes must also be accounted for in the FEIS. This is true for all Alternatives, but particularly if Sound Transit proceeds with Alternative DT-2 in South Lake Union.

2. Sound Transit Should Select Alternative DT-1 in South Lake Union and Avoid a Mercer Street Station.

Sound Transit should select Alternative DT-1 in SLU and avoid a Mercer Street station. Not only will the Harrison Street station yield much higher ridership levels, the Harrison Street station results in fewer adverse impacts on the community, as discussed in Sections 3 of this letter.

The Harrison Street station better serves the needs of the SLU community. As shown in Table 3-31 of the Transportation Technical Report, the preferred DT-1 Harrison Street alignment for the SLU station would generate nearly twice the ridership of the DT-2 Mercer Street alignment. The Harrison Street station is closer to the heart of SLU and serves as a more convenient location for riders, while the proposed Mercer Street station is west of Aurora Avenue, effectively putting it outside SLU. Furthermore, while all crosswalks surrounding the Harrison Street station have capacity to handle the anticipated increased pedestrian usage, the same is not true for the Mercer Street alignment. DEIS Transportation Technical Report, pgs. 6-40 and 6-41.

ARE strongly urges Sound Transit to adopt the Alternative DT-1 alignment as the preferred alternative for the SLU station.

3. Construction and Operational Impacts of DT-2 are Significant and Require Further Analysis in the FEIS.

The DEIS construction and operations analysis does not sufficiently disclose impacts of Alternative DT-2 in SLU generally and on the Proposed Project. Alternative DT-2 would place a light rail tunnel a block from Site, which will cause impacts described below that are not adequately considered or disclosed in the DEIS. The DEIS analysis must provide additional information on vibration, electromagnetic field interruptions, physical constraints, traffic, pedestrian, and economic impacts to the Site and on SLU from the WSBLE construction.

a. Vibration Impacts to Sensitive Laboratory Uses in the Proposed Project

As noted above, the Proposed Project provides laboratory space for life sciences research. The DEIS describes Category 1 land uses as the most sensitive to vibration, including "buildings where vibration-sensitive research and manufacturing equipment is conducted, hospitals with vibration-sensitive equipment, and universities conducting physical research operations." DEIS, pg. 3-8. The life sciences biomedical research contemplated at the Site's laboratories are a Category 1 sensitive use and should be considered as such in the analysis.

The methodology for assessing vibration impacts in the DEIS was to collect and average vibration data for West Seattle, Downtown, and Interbay/Ballard. DEIS Noise and Vibration Technical Report, pg. 4-8. For existing Category 1 buildings, site-specific data was collected and analyzed. *Id.*,

pgs. 4-10 and 5-11. It appears the DEIS analysis did not account for the pipeline Category 1 sensitive uses on the Site, despite the Site's active permits and available plans. The FEIS must adequately disclose these potential vibration impacts and identify appropriate mitigation measures.

The DEIS analysis states construction vibration mitigation will consist of a Construction Vibration Control Plan which will include "[s]pecific vibration-control measures where predicted levels exceed the limits." *Id.* pg. 7-31. This plan needs to be developed as part of the FEIS, and the "specific measures" for vibration controls during construction adjacent to the Site must be identified.

b. Operational Electromagnetic Field Impacts Must be Analyzed in the FEIS

In addition to uses sensitive to vibration, laboratories proposed at the Site will also contain uses and equipment sensitive to electromagnetic field ("EMF") disruptions. The DEIS identifies other laboratories in SLU, including UW Medicine, with EMF sensitivities, but the analysis does not identify the Site and its laboratory use. DEIS, Section 4.3.13.1. The analysis concludes there will be no impact, and no mitigation is required, but this analysis must be updated in the FEIS to account for the Site's laboratories.

c. Vehicular and Transit Impacts Due to Roadway Closures

Mercer Street is a heavily traveled roadway, generating between 18,100 and 35,000 trips per day. DEIS Transportation Technical Report, Table 4-35. It is the main arterial connecting Seattle's westside neighborhoods to I-5. Despite this, Alternative DT-2 would close lanes on Mercer Street for 3.5 years, negatively affecting congestion and limiting access to and from SLU and the region more broadly. *Id.*, pg. N.1E-27. This Mercer Street closure would impact up to 100 buses per hour, including RapidRide and Express routes. *Id.*, Table 3-37. "The partial closure of Mercer Street would affect three Metro routes and could impact trolley bus operations, necessitating short-term, off-wire bus service or temporarily shifting the overhead trolley wire system to maintain operations." *Id.*, pg. 3-55. Partial closure of Mercer Street will undoubtedly affect traffic patterns, increase congestion, and fundamentally alter accessibility in and to SLU. The ripple effects of these changes must be analyzed in the FEIS due to the importance of Mercer Street to the entire area's transportation operations.

d. Pedestrian Impacts at Mercer Station

The operational pedestrian environment is much worse at the Alternative DT-2 Mercer Street station than the DT-1 Harrison Street station. The crosswalk across Taylor Avenue North at the Mercer Street station is expected to operate at LOS F. DEIS Transportation Technical Report, pg. 6-41. If Sound Transit selects the Mercer Street station alignment for the South Lake Union station, then the FEIS must further study the potential safety and traffic impacts associated with pedestrians using a crosswalk operating at LOS F.

4. Overall DEIS Concerns

a. Cumulative Effects

As noted above, the pipeline projects analyzed as part of the cumulative effects analysis were taken from May 2021. That information will be more than a year stale by the time the FEIS is issued, and this project list should be updated for the FEIS analysis.

The FEIS should also acknowledge that future, simultaneous construction is likely. Those impacts are downplayed in the cumulative effects analysis in the DEIS, which states, “[c]onstruction in or near roadways typically requires lane closures, detours, and traffic delays. Interactions among two or more concurrent construction projects can intensify these impacts. *However, most reasonably foreseeable future actions that can be reliably identified at present would be completed or near completion before the WSBLE Project construction would begin.*” DEIS Transportation Technical Report, Pg. 11-1 (emphasis added). Seattle’s construction pipeline will not be frozen, and it is reasonably foreseeable based on adopted long-range planning documents that there will be simultaneous construction projects that will require additional lane and sidewalk closures. The FEIS analysis needs to account for future projects that may be in development at the same time as the WSBLE.

b. Construction Sequencing

The cumulative impacts analysis discussed above focuses on WSBLE impacts combined with other project impacts, but the DEIS also inadequately discloses the WSBLE’s own cumulative impacts due to the lack of information on segment construction sequencing. The DEIS states, “[e]xcept where noted, the sequencing of construction activities was not assessed for the Draft Environmental Impact Statement, and some of the impacts described in this section may occur simultaneously. Detailed construction planning, including sequencing, will be provided in later phases of the environmental analysis once project design is sufficiently advanced.” DEIS Transportation Technical Report, Pg. 4-114. This updated analysis must be included in the FEIS to allow an adequate evaluation of the WSBLE project impacts.

c. Pedestrian Impacts Due to Sidewalk and Bicycle Lane Closures

In general, the FEIS must also include more information about anticipated sidewalk closures during construction. The introduction to the “Construction-Related Roadway Modifications” attachment to the Transportation Technical Report states, “[r]oadway closures could also include short-term or long-term closure of sidewalks. Extent and duration of sidewalk closures will be coordinated with the City of Seattle in later phases of project development.” DEIS Transportation Technical Report, pg. N.1E-1.

Sidewalk closures are a critical component of the environmental analysis. This information cannot be coordinated and disclosed later. The pedestrian impact analysis must also account for pipeline projects, like the Proposed Project, as it models pedestrian and bicyclist volumes and patterns. If there is not enough specificity around sidewalk and bike lane closures, then the FEIS should assume a worst-case analysis and analyze sidewalk and bike lane closures along all identified roadway closures.

d. Economic Impacts from Business Disruptions

SLU’s businesses will be affected by traffic impacts during and after construction of the WSBLE. The DEIS discloses business displacement when Sound Transit directly takes over a property, but fails to analyze how businesses will be affected where new traffic impacts and sidewalk closures affect access to their businesses. *See* DEIS, Sections 4.3.1.3.3 and 4.3.3.3.4. Traffic impacts that make businesses hard to reach and limit patronage can result in a *de facto* displacement of the business. To fully understand how each alternative will affect the South Lake Union community, the FEIS must analyze business displacements due to traffic impacts under the various alternatives.

5. Suggested Mitigation for Consideration in the FEIS

Based on the impacts identified above and the impacts identified in the DEIS, ARE would encourage consideration of the following mitigation measures in the FEIS. These mitigation measures are critical if Alternative DT-2 is selected as the preferred alternative.

- Prepare a Site-specific vibration mitigation plan to allow uninterrupted life sciences laboratory work in the Proposed Project during construction and operation.
- Prepare a Site-specific electromagnetic field analysis with necessary mitigation identified in the analysis.
- Prepare comprehensive detour plans and routes that minimize traffic impacts on the Mercer Corridor. Provide additional information about wayfinding signage and messaging for pedestrians and bicycles.
- Where possible, avoid impacts to bike lanes and sidewalks. Where impacts are necessary, provide a safe, accessible, well-lit detour routes with clear wayfinding signage.
- Prepare a plan, including financial assistance, to support businesses (including building tenants) negatively impacted by construction impacts. Expand the mitigation analysis to include not just wholly closed and physically displaced businesses, but also businesses that will experience *de facto* displacement from construction impacts.

In conclusion, ARE strongly urges Sound Transit to adopt the DT-1 alignment and avoid a station on Mercer Street. The Harrison Street SLU station will be more functional and have less impact on the neighborhood. Sound Transit should also include additional analysis in the FEIS related to potential impacts to the Site as identified above. We look forward to continued engagement in the WSBL EIS process and would be happy to meet with Sound Transit to share additional information about the Proposed Project on the Site.

Sincerely,

ARE-SEATTLE NO. 33, LLC,
a Delaware limited liability company

By: ALEXANDRIA REAL ESTATE EQUITIES, L.P.,
a Delaware limited partnership,
managing member

By: ARE-QRS CORP.,
a Maryland corporation,
general partner

By:



William Barrett
Vice President
Real Estate Legal Affairs



ALEXANDRIA.

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104
Email: WSBLEDEIScomments@soundtransit.org

Re: 1010 4th Avenue S. - Comments on the West Seattle and Ballard Link Extension
Draft Environmental Impact Statement

Dear Ms. Swift:

We are writing on behalf of ARE-Seattle No. 35, LLC, an affiliate of Alexandria Real Estate Equities, which is the owner of the property located at 1010 4th Avenue S. (TPN 7666204770, TPN 7666204760 and TPN 7666204745) (collectively, the "Property") to provide comments on the Draft EIS for the WSBLE project. The Property is the former home of Salvation Army headquarters in Seattle and is planned for redevelopment for office and research & development uses in a campus as large as 583,000 s.f. (the "Project"). We are in active planning for the Project and anticipate initiating the application process this year.

The 4th Avenue CID alternatives in the Draft EIS would both have the effect of preventing the redevelopment of the Property. Instead of being the new home of thousands of jobs, the Property will be used for multiple TPSS power structures, a large flow control vault and a large ventilation facility (for the shallow alternative) or for a TPSS power structure and construction staging area (for the deep alternative).

It would be unfortunate if the cost of developing the WSBLE project would be the elimination of nearby TOD development opportunities. But that is precisely what the Draft EIS proposes.

Our additional comments on the Draft EIS are as follows:

- We have previously shared with Sound Transit our geotechnical information for the Property. This data indicates that the construction of the shallow tunnel on 4th Avenue will require substantial dewatering, which will raise issues of migration of contaminants in the area and possible impacts to foundation structures of other nearby buildings. The Draft EIS should use this site-specific information to

identify and address the impacts of this work.

- The Draft EIS does not address the loss of future development as an indirect impact of the WSBL project. There are several issues to consider:
 - As noted above, it is contrary to the goals of the WSBL project to eliminate TOD development opportunities near existing light rail stations in the process of expanding the system.
 - The Draft EIS should address the loss of thousands of jobs at the Property and, cumulatively, the loss of many thousands more along the entire corridor, as future development sites are conscripted to service for rail service.
 - The development of the Property would generate several million dollars in fees for affordable housing development in Seattle. The loss of projects on this site and others will result in a significant loss of affordable housing in the City in decades to come. The Draft EIS must address these indirect impacts.
- Development of the Project will begin to introduce positive pedestrian elements to 4th Avenue S., which has high pedestrian volumes today during sports events but lacks any pedestrian quality. The WSBL shallow tunnel alternative would be a step backward, populating 4th Avenue on the Property with a host of support, utility, and venting uses. The Draft EIS does not evaluate the impact of the WSBL project on this pedestrian environment or propose any mitigation to these clearly adverse effects. We believe 4th Avenue S. presents an opportunity to link Union Station to the sports facilities and the Project will be an important step in this direction. It appears that the WSBL project intends to turn its back on this opportunity.
- All alternatives will include multiple street closures in the vicinity of the Project. We are concerned that these closures are at best only guesses, since actual construction methodology has not been identified. The uncertainty associated with these closures and their inevitable impact have not been thoroughly evaluated in the Draft EIS. More specific mitigation measures for congestion impacts must be developed.
- These construction impacts may also impact the developability of the Project, adding time and cost to the development. The Draft EIS should address these impacts and propose mitigation.
- We understand that Sound Transit has developed, and is continuing to develop, more specific construction plans and guidelines. This work would help to characterize SEPA impacts, but this information has not been included in the Draft EIS.

- The WSBLE EIS should be conducted as part of a phased review process under SEPA. Due to the infancy of the project plans, the desire to defer actual construction decisions to some future contractor and the lack of information about most impacts, it is appropriate to phase this SEPA review so that review of actual on-the-ground impacts can occur in the future at a time when there is adequate information to support that review. The current Draft EIS is not a project action EIS, since the actual project is hardly defined at all; it is more in the nature of an early programmatic EIS, which anticipates the need for additional future SEPA review. While it may be appropriate to make large-scale decisions about corridor alignment through this EIS process, future decisions about construction methodology, street closures, final station entrance locations and their design, should require future SEPA review when facts and information are available to allow that review to occur adequately.
- In circumstances like this one, where information critical to evaluation of environmental impacts is not available, phased SEPA review is appropriate, as noted above. Pending future phased review, however, SEPA also requires the agency to conduct a worst-case analysis. But far from conducting a worst-case analysis, the Draft EIS does not even attempt to characterize actual impacts from street closures, surface construction and staging areas or other construction impacts.

We support the WSBLE project and believe it will be a significant benefit to Downtown Seattle and the region if properly executed. But the Draft EIS does not do an adequate job of characterizing the impacts and effective mitigation associated with the WSBLE project. Sound Transit should prepare a supplement to the Draft EIS that fully describes the WSBLE project and evaluates all impacts associated with the proposal.

We appreciate the opportunity to provide these comments.

Sincerely,

ARE-SEATTLE NO. 35, LLC,
a Delaware limited liability company

By: ALEXANDRIA REAL ESTATE EQUITIES, L.P.,
a Delaware limited partnership,
managing member

By: ARE-QRS CORP.,
a Maryland corporation,
general partner

By:



William Barrett
Vice President
Real Estate Legal Affairs

Sound Transit Projects

Details	Communication
<div>#504798</div> <div>Date Recieved: 4/26/2022</div> <div>Created by: Leah Litwak</div> <div>Audience: Impacted businesses</div> <div>Reach: 2</div> <div>Participation:</div> <div>Engagement:</div> <div>Source: Email</div> <div>Assigned division: Outreach</div> <div>Category:</div> <div>Project Phase: Planning</div> <div>Project Segment:</div> <div>Environmental phase: Draft EIS</div>	<div>To whom it may concern,</div> <div>Our business is Artful Ashes. We employ 12 staff members and are a tenant of Dusty Springs. We personally would strongly appreciate the ability for our business to stay here for many many years. We're very proud of our business and are going to pass it on to our staff. We're hoping for the "Elevated14th Option (from Prospect St/15th), also known as IBB-1b or Ray and Sue Mooers's additional proposal which I've attached.</div> <div>Much more important than our needs, Ray and Sue Mooers have 68 employees that would be displaced. Ray and Sue are incredibly kind and manufacture Harps. When I first signed a lease here, Ray shared a story about how the building became necessary. They were displaced by the Fire Department. They constructed a new building perfectly fitting their needs, assuming protection from ever moving again. Their dream includes passing their amazing business on to Family and Staff so it runs forever...</div> <div>I ask, Please don't displace them again. It simply wouldn't be fair on any level. If you find yourself on the fence, please consider kindness ??</div> <div>Greg and Christina Dale and the Artful Ashes Team ??</div>

PROPOSAL BY RAY MOOERS 206-634-1656
raym@dustystings.com

3-29-2022

W

Proposed Track Revisions
3-29-2022
Ray Mooers 206-634-1656
raym@dustystings.com

Proposed WSB Link Track Revisions
Through North Interbay for routes:
Preferred Elevated 14th Ave IBB-1A
Preferred Tunnel Alternatives IBB-2a, IBB-2b

From Interbay Station at 17th Ave W., Extend
elevated track (or retained cut) Northward along
Thorndyke Ave W, turning NE at the intersection of
Thorndyke Ave W and 16th Ave W., entering the property
with address 3615 15th Ave W (Read Products building).
In service of preserving the properties and businesses
that would otherwise be taken along the current proposed
track routes, Mr. Chuck Read would prefer that his property
be condemned instead of the others, colored in yellow.



PROPOSED ALTERNATE

E

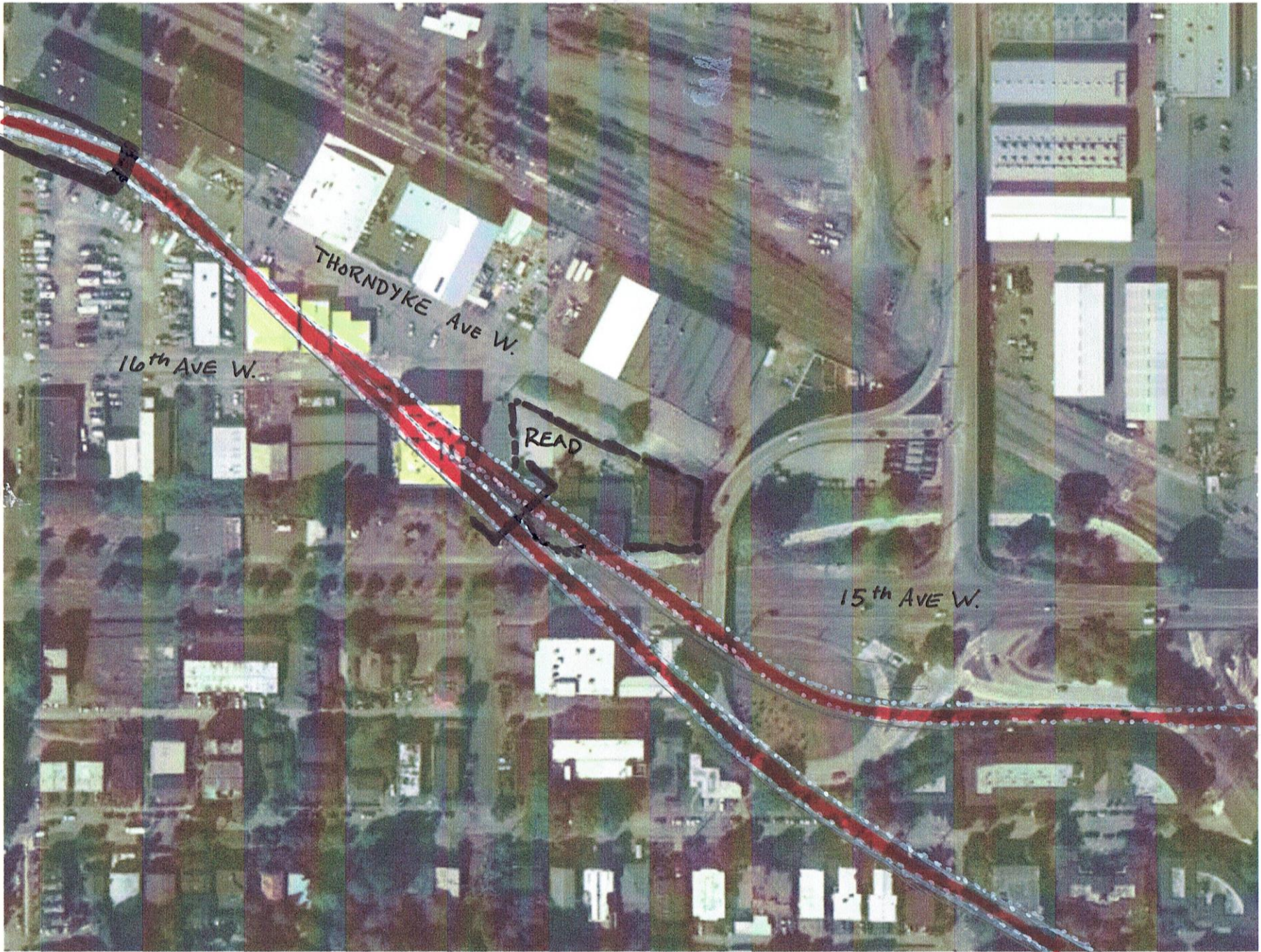
PROPOSED REVISIONS TO WSB LINK
PREFERRED ROUTES IBB-1a and
IBB-2a, 2b

3-29-2022

W

S

N



IBB-2a
IBB-2b

WSB LINK PREFERRED ALTERNATIVES

E

IBB-1a



5306 Ballard Avenue NW, Suite 215, Seattle, Washington 98107 | 206.784.9705 | mike@ballardalliance.com

April 28, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 South Jackson Street
Seattle, Washington 98104
Sent via email to WSBLEDEIScomments@soundtransit.org

Dear Ms. Swift,

As an organization representing hundreds of businesses and thousands of residents in Ballard, I am writing today to voice strong support for the Sound Transit West Seattle and Ballard Link Extensions (WSBLE) Draft Environmental Impact Statement (DEIS) Preferred Tunnel 15th Ave Station Option (1BB-2b).

This is the only alternative that fully meets the following shared objectives:

- **Prioritizing a tunnel** ensures our neighborhood, which already has one unreliable movable bridge, has access to consistent and predictable transit service to accommodate the significant growth the Ballard HUB Urban Village has experienced in the last decade and will continue to see in the years ahead. It also minimizes disruption to the ship canal and our maritime businesses, as well as salmon and other environmental concerns.
- **Avoid a station location at 14th Avenue NW and only consider the 15th Ave NW locations and – preferably – study additional station location options further West within the dense downtown Ballard core.** The block from 15th Ave NW to 14th Ave NW is long, not walkable from the west side of Ballard, and presents significant pedestrian safety issues. A vast majority of residential density continues to develop west of 15th Ave NW and a location west of 15th Avenue NW will ensure that this much-needed transit connection is closer to Ballard's urban residential and retail core.
- According to Sound Transit's DEIS analysis, **alternative 1BB-2b has some of the least displacement impacts compared to the current Preferred Alternative.**
 - o Residential: 21 parcels vs 94-105
 - o Businesses: 43 parcels vs 64 – 71
 - o Employee displacement: 370 vs 540 – 610
- **Construction impacts for alternative 1BB-2b are also less than the current Preferred Alternative**, as it avoids a multi-year closure of 15th Ave NW (nights / weekends), three-year closure of 14th Ave NW and long-term impacts to pedestrian and bicycle access to the Burke-Gilman Trail.

- **The current Preferred Alternative will also have extremely disruptive, if not devastating impact to the brewery and maker's spaces, as well as the new Ballard Food Bank,** that are currently in the industrial spaces along 14th Ave NW in East Ballard. This displacement cannot be mitigated and is part of the heart and culture of our neighborhood.
- **The current Preferred alternative will also jeopardize Seattle's maritime and industrial future.** For decades, elected leaders and business owners in Seattle have worked to ensure that a regional economy bolstered by living-wage maritime and industrial jobs can continue. Siting a transit station within industrial lands on 14th Avenue NW will create tremendous and unavoidable pressures for future transit-oriented development, threatening the existence of maritime and industrial businesses that have been Seattle's hallmark for the last 100+ years.

Based on the DEIS data, and the overwhelming amount of unified community support, we request the Sound Transit Board to designate the Tunnel 15th Ave Station Option (1BB-2b) as the Preferred Alternative going forward.

In addition, we wish to offer the following specific comments regarding the WSBLE DEIS, including:

1. The DEIS does not adequately describe the impacts, both temporary and permanent to the Ballard neighborhood. This is in part because the DEIS is based on inadequate construction plans, which are at less than 5 percent completion. As such, many key elements are not yet defined, including:
 - a. Actual construction methodology for tunnels, such that noise and vibration impacts cannot be estimated;
 - b. Scope of above-grade construction;
 - c. Actual street, sidewalk and bicycle lane closure locations and durations;
 - d. Scope and design of above-grade improvements with station entrances; and
 - e. Duration and sequence of construction activities that allows for determination of cumulative impacts to the urban environment, particularly along the 14th Avenue NW brewery corridor.

Due to the lack of adequate description of these impacts, the DEIS fails to characterize these impacts or identify and evaluate appropriate mitigation measures, particularly for the Alternative 1BB-2b alignment

2. The DEIS does not evaluate or anticipate the City's ongoing Industrial and Maritime Lands planning work, which is currently under review with the City with an anticipated adoption in 2023 of new land use and zoning regulations that support innovative industrial uses and increased heights and densities in Ballard. Sound Transit must study and account for these reasonably foreseeable increases in industrial and maker-use job density – particularly on the well-established industrialized 14th Avenue NW corridor – in its analysis. The reasonably foreseeable increase in innovative industrial job density along the 14th Avenue corridor resulting from the City's planning efforts, including increased potential for industrial and business displacement, should be evaluated in a supplemental EIS and appropriate mitigation identified.

3. On April 19, 2022, Sound Transit briefed the City's Transportation Committee regarding potential "refinement" concepts for the WSBLE alignment, including but not limited to alleged "cost savings" for the Ballard alignment. The DEIS fails to adequately disclose and analyze these "refinement" options. Should Sound Transit elect to proceed with consideration of "refinements" for the Ballard alignment, Sound Transit must undergo supplemental environment review to meaningfully disclose the alternatives and impacts and provide additional comment opportunities for stakeholders to evaluate and respond to an informed analysis.
4. The DEIS also does not adequately describe the affected environment and land use of the WSBLE alignment options in Ballard. For instance, the Alternative 1BB-2b analysis appears to omit currently approved but not constructed projects such as 1145 NW Market (SDCI Permit No. 3036742), which will provide an additional 122 homes in Ballard and would be subject to potential displacement and/or construction impacts under the Alternative 1BB-2b alignment. In addition to the impacts to existing Ballard businesses and community assets, such as the Ballard Food Bank referenced above, DEIS fails to provide an accurate baseline assessment of the land use and potential construction, land use, and aesthetic impacts of the Alternative 1BB-2b alignment. Sound Transit must update the baseline to produce an accurate assessment of construction impacts and mitigation measures necessary for the Alternative 1BB-2b alignment.
5. The DEIS should be conducted as part of a phased review process under SEPA. Due to the infancy of the project plans, the desire to defer actual construction decisions to some future contractor and the lack of information about most impacts, it is appropriate to phase this SEPA review so that review of actual on-the-ground impacts can occur in the future at a time when there is adequate information to support that review. The current DEIS is not a project action EIS, since the actual project is hardly defined at all; it is more in the nature of an early programmatic EIS, which anticipates the need for additional future SEPA review. While it may be appropriate to make large-scale decisions about corridor alignment through this EIS process, future decisions about construction methodology, street closures, final station entrance locations and their design, should require future SEPA review when facts and information are available to allow that review to occur adequately.
6. Given this uncertainty, where information critical to evaluation of environmental impacts and mitigation is not yet available, phased SEPA review is appropriate, as noted above. Pending future phased review, however, SEPA also requires the agency to conduct a worst-case analysis. But far from conducting a worst-case analysis, the DEIS does not even attempt to characterize actual impacts from street closures, surface construction and staging areas or other construction impacts.

We urge Sound Transit to look at station design not through a simple "do no harm" lens, but instead as a world-class design opportunity that will add to the character that makes neighborhoods like Ballard unique.

We thank Sound Transit for the opportunity to comment and will continue to work with both Sound Transit and the City of Seattle to ensure this project results in a high-quality transit service that serves the people of Seattle and the Sound Transit district for the next 100 years.

Sincerely,



Mike Stewart, Executive Director

April 28, 2022

Sound Transit Board
1100 2nd Avenue
Seattle, WA 98101

RE: Sound Transit 3 Draft Environmental Impact Statement (DEIS) Public Comment

Dear Sound Transit Board Chair Keel and Vice Chairs Constantine and Somers:

As business leaders, business owners, residents and workers in Ballard, we write you today to voice strong support for the Sound Transit West Seattle and Ballard Link Extensions (WSBLE) Draft Environmental Impact Statement (DEIS) Preferred Tunnel 15th Ave Station Option (1BB-2b).

This is the only alternative to fully meet the following shared objectives:

- **Prioritizing a tunnel** ensures our neighborhood, which already has one unreliable movable bridge, has access to consistent and predictable transit service to accommodate the significant growth the Ballard HUB Urban Village has experienced in the last decade and will continue to see in the years ahead. It also minimizes disruption to the ship canal and our maritime businesses, as well as salmon and other environmental concerns.
- **Avoid a station location at 14th Avenue NW and only consider the 15th Ave NW locations and – preferably – study additional station location options further West within the dense downtown Ballard core.** The block from 15th Ave NW to 14th Ave NW is long, not walkable from the west side of Ballard, and presents significant pedestrian safety issues. A vast majority of residential density continues to develop west of 15th Ave NW and a location west of 15th Avenue NW will ensure that this much-needed transit connection is closer to Ballard's urban residential and retail core.
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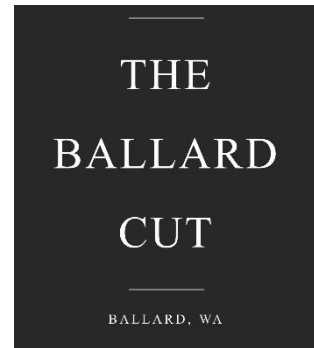
- The current Preferred Alternative will also have extremely disruptive, if not devastating impact to the brewery and maker's spaces, as well as the new Ballard Food Bank, that are currently in the industrial spaces along 14th Ave NW in East Ballard. This displacement cannot be mitigated and is part of the heart and culture of our neighborhood.

Based on the DEIS data, and the overwhelming amount of unified community support, we request the Sound Transit Board to designate the Tunnel 15th Ave Station Option (1BB-2b) as the Preferred Alternative going forward.

Sincerely,







bunsoy



Sound Transit Projects

Details	Communication
<div>#502169</div> <div><div>From:</div><div>Maria Ruano</div></div> <div><div>Date Recieved:</div><div>4/27/2022</div></div> <div><div>Created by:</div><div></div></div> <div><div>Audience:</div><div></div></div> <div><div>Reach:</div><div></div></div> <div><div>Participation:</div><div></div></div> <div><div>Engagement:</div><div></div></div> <div><div>Source:</div><div>Online open house</div></div> <div><div>Assigned division:</div><div>Outreach</div></div> <div><div>Category:</div><div></div></div> <div><div>Project Phase:</div><div>Planning</div></div> <div><div>Project Segment:</div><div></div></div> <div><div>Environmental phase:</div><div>Draft EIS</div></div>	<div>I own a business at 4021 13th Ave W. This construction will force Bedrock Industries to move. We really can't afford that so if the 15th Ave W route is chosen, I hope Sound Transit will have funds to help Bedrock so we won't have to close.</div> <div>In addition, As most of Ballard is west of 15th Ave NW, I feel the Thorndyke option at 20th would be the best route and cause the least disruption to regular traffic over the course of the construction while also placing the station in a more Ballard central location. Thank you for considering this,</div> <div>Maria Ruano</div>



BOSA

**Bosa Development
California**
121 West Market Street
San Diego CA 92101

tel 619 702 0760
fax 619 702 0763
thinkbosa.com

WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104
Email: WSBLEDEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of Bosa Development, the owner of the property located at 601 4th Avenue (TPN 0942000855) (the "Property") to provide comments on the Draft EIS for the WSBLE project. The Property is the site of the Civic Square development.

The Civic Square project has had a 15-year history in Downtown Seattle. We are proud to report that construction of the project has commenced this month and we look forward to delivering a world-class urban development to the heart of Downtown Seattle. The Property is immediately adjacent to an existing Sound Transit station entrance and we have worked closely with Sound Transit and the City to integrate this important transit facility into our development program.

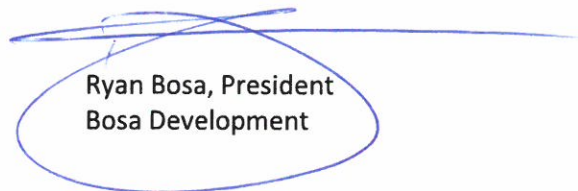
We support the WSBLE project and the opportunity to expand light rail accessibility throughout Downtown. We do note that the Draft EIS suggests a long-term closure of Cherry Street between 3rd Avenue and 4th Avenue. While we understand that the details of any such closure have not been determined, the only vehicular, drop-off and loading access to Civic Square are located on Cherry Street, so any closure will have a major impact on our project.

We therefore encourage Sound Transit to evaluate the impact of this and other local street closures on the Civic Square site and other nearby properties, and to propose mitigation for the impacts of such closures.

We would be happy to work with you on the planning for such closures and mitigation, in order to avoid impacts to Civic Square.

We appreciate the opportunity to provide these comments.

Sincerely,



Ryan Bosa, President
Bosa Development

April 26, 2022

WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift

Sound Transit

401 S. Jackson St.

Seattle, WA 98104

Email: WSBLEDEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of BPP 800 Fifth Property Owner, LLC, which is the owner of the property located at 800 5th Avenue (TPN 0942000470) (the “Property”) to provide comments on the Draft EIS for the WSBLE project. The Property is the site of the 800 5th Avenue office development (the “Project”).

We have appreciated the opportunity to meet with Sound Transit representatives in the past few months to discuss the WSBLE project and its possible impact on the Project. One alternative reviewed in the Draft EIS would locate a station entrance for the proposed Midtown station at the southwest corner of the Project site. This would necessitate extensive modifications to the Project, both above- and below-grade. If this alternative is selected, much cooperation will be required to establish plans for this work that minimize impacts on the Project.

While we support the WSBLE project, we are concerned about the likely impacts on the Project, both during and after construction. The long duration of possible construction will undoubtedly have adverse effects on the use, operation and leasing of the Project. We also fear that below-grade modifications will create problems for the use, efficiency and layout of the Project garage. We believe the Final EIS should address all these issues and identify mitigation for these probable impacts.

We also wonder what alternative station locations were considered in lieu of 800 5th Avenue. We would appreciate learning more about these options and why they were rejected.

At a higher level, the Draft EIS does not present a clear enough plan for WSBLE to allow it to describe the impacts of WSBLE nor offer specific plans for mitigation of these impacts. In both these regards, the Draft EIS seems to be deficient and we expect Sound Transit will address these shortcomings moving forward.

Finally, we note that WSBLE will inevitably seek many long-term street closures in the vicinity of the Project. We are concerned that these closures are not well enough defined, nor does the Draft EIS outline specific measures resulting from the WSBLE project will make it difficult, if

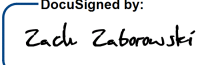
800 Fifth Avenue, Suite 3838
Seattle, WA 98104

not impossible, to construct our Project. The Draft EIS does not seriously evaluate the extensive effect of these street closures on the vitality and future development of Downtown. These issues should be addressed.

We appreciate the opportunity to provide these comments.

Sincerely,

BPP 800 FIFTH PROPERTY OWNER LLC,
a Delaware limited liability company

By: 
B2F97D07F09845F...

Name: Zach Zaborowski

Title: Vice President

800 Fifth Avenue, Suite 3838
Seattle, WA 98104

April 26, 2022

WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift

Sound Transit

401 S. Jackson St.

Seattle, WA 98104

Email: WSBLEDEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of BPP 1420 Fifth Avenue Owner LLC, which is the owner of the property located at 1420 5th Avenue (TPN 1975700080) (the “Property”) to provide comments on the Draft EIS for the WSBLE project. The Property is the site of the U.S. Bank Center office development (the “Project”).

Our principal concern regarding the WSBLE project is the unavoidable impact of the substantial planned construction in the retail core. Construction noise, staging and attendant street closures will create a level of congestion and an environment inhospitable to pedestrians in the one location Downtown where pedestrian quality is critical. These impacts will also affect access to our building and the Project garage and loading dock. We do not see in the Draft EIS a clear description of these construction impacts or any plan for mitigating these significant effects.

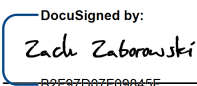
This lack of description of impacts and mitigation in the Draft EIS extends beyond the retail core and the construction period. We are concerned as well that the Draft EIS does not provide adequate information on these key issues to allow the public and decisionmakers to understand and evaluate the WSBLE project. Finally, we worry that the Draft EIS pays too little attention to important issues of urban design and pedestrian activation for the many significant light rail-related structures that appear destined to appear throughout Downtown. We expect Sound Transit will address these shortcomings moving forward.

We appreciate the opportunity to provide these comments.

Sincerely,

BPP 1420 FIFTH AVENUE OWNER LLC, a Delaware limited liability company

1420 Fifth Avenue, Suite 450
Seattle, WA 98101

By: 
B2F97B07F09045F...

Name: Zach Zaborowski

Title: Vice President

1420 Fifth Avenue, Suite 450
Seattle, WA 98101

Sound Transit Projects

Details	Communication
#502835	Comments Submitted on behalf of the Buildings Owners and Managers Association (BOMA) by Catherine Stanford, Contract Public Affairs Consultant for BOMA.
From: Catherine Stanford	West Seattle to Ballard Link Extension DEIS Comments April 28, 2022
Date Received: 4/28/2022	Comments submitted on behalf of BOMA Seattle King County, Rod Kauffman, President
Created by:	Building Owners and Managers Association Seattle King County (BOMA) is an industry association representing the owners and managers of commercial real estate property. Our members own and manage most of the high-rise commercial buildings in the Seattle Downtown Core. Our Industry Partner members are those that provide goods and services to the properties.
Audience:	We have been an active participant in the WSBLE stakeholder group convened by the Greater Seattle Chamber and have had presentations by the Sound Transit teams on the stations sitings that will most impact our buildings, service providers and tenants.
Reach:	We have grouped our comments into three categories:
Participation:	1. Siting:
Engagement:	a. Take into consideration current pedestrian paths, as well as ingress and egress to buildings.
Source: Online open house	b. Put priority siting on proximity to high occupancy buildings where the Link will benefit from the most use.
Assigned division: Outreach	c. Ensure all stops are universally accessible. Our industry has worked diligently to ensure broad accessibility to our buildings.
Category:	d. Include amenities for non-motorized connections.
Project Phase: Planning	e. Consider the impact of relieving the downtown surface streets of bus transit to alleviate traffic congestion and pollution.
Project Segment:	f. There is no mitigation for the loss of on street parking either temporary or permanent. In light of the fact that the downtown area has seen a significant, incremental loss of parking over the past 10 years, this needs to be addressed. Curbside parking is also very important to consider as it relates to Access vans, ride share vehicles and delivery of goods and services.
Environmental phase: Draft EIS	2. Property Acquisition:
	a. Consider type of property and value of current use.
	b. Take a long-term view and consider potential for adaptive re-use or new development and how property would serve downtown.
	3. Construction:
	a. Plan the construction to ensure the minimal impact possible; employ proven strategic construction practices.
	b. Consider ingress and egress from parking garages, loading docks, alleys serving buildings, building entrances and street level retail tenants and provide more detail on how that will be managed
	c. A Construction Access and Traffic Management Plan is anticipated in the DEIS, but there is no description of how it would be developed. What are the overarching goals and objectives for the project's construction and the approach to partner agency coordination?
	d. The DEIS recognizes that the Downtown Segment would have the greatest potential for cumulative impacts, as it has the highest density of reasonably foreseeable future actions. However, any adverse impacts would be temporary. We do not believe that a multi-year impact is "temporary." In addition, stating that "construction is typically an indicator of economic growth, as it brings temporary and permanent jobs and revenue to local economies" seems dismissive of the real impact on businesses. We know from our recent experience with the pandemic that many businesses will simply not survive. There must be a robust plan in place to support businesses well in advance of the start of construction.
	e. What are the impacts of noise and vibration? Will there be vibration from the tunnel operation once it is completed?
	f. Digging a tunnel through an urban core requires a comprehensive pest control program to reduce infestation of neighboring buildings.
	g. Consider the impact of street closures on surrounding streets and mitigate that impact as much as possible.
	h. There are many comments in the DEIS about the methods of communication, however, it is critical for Sound Transit to build relationships and work closely with building owners and managers to understand how the property functions prior to determining construction. Communicate in a timely manner.
	Overall, we do not believe that there is enough detailed information in the DEIS to be able to make an informed choice regarding the alternatives. The question of potential revisions to the project are also an issue in making a determination.
	As noted in our stakeholder letter, we support the extension of light rail to West Seattle and Ballard and completion of the Sound Transit 3 program as promised to voters. We also believe the upcoming decision by the Sound Transit Board of Directors to confirm or modify the preferred alternative for the project is of great importance to the future of our city and region.
	The construction phase is our biggest concern. If improperly managed, the risks to the economic health of downtown are high. Not only does our industry house the region's employers, it also provides good living wage jobs and significant revenue to the City of Seattle, King County and the State through property tax, REET, sales tax, parking tax, and other taxes and fees.
	Our owners and managers are prepared to work closely with the ST teams to educate them on how the buildings operate and we at BOMA are happy to facilitate that engagement.
	Thank you for the opportunity to submit comments. We look forward to a productive project and a prosperous downtown that benefits everyone in the region



VIA ELECTRONIC MAIL

WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift

Sound Transit

401 S. Jackson St.

Seattle, WA 98104

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

Dear Ms. Swift,

We are writing on behalf of Chinatown-International District Business Improvement Area (CIDBIA) to provide comments on the Draft Environmental Impact Statement ("DEIS") for the West Seattle and Ballard Link Extensions Project ("WSBLE"), notice of which was issued on January 28, 2022. Thank you for your consideration on these comments to address a historic project that will affect the Chinatown-International District and Pioneer Square for the next 100 years.

About CIDBIA and Chinatown-International District

Chinatown-International District Business Improvement Area (CIDBIA) is one of 11 Business Improvement Areas (BIAs) in the City of Seattle. The CIDBIA is a geographic based nonprofit organization that is tasked with improving and promoting Seattle's historic Chinatown-International District as a vibrant business district. CIDBIA collects an assessment from properties, businesses, and other types of stakeholders within the geographic boundaries to support the economic vitality of the neighborhood. The boundaries of CIDBIA are from 4th Avenue South to Interstate-5, Yesler Avenue South to South Dearborn Street, however, the scope of work for the organization extends beyond the geographic boundaries east to Rainier Avenue South to also service the Little Saigon neighborhood. CIDBIA is governed by a ratepayer advisory board who represent stakeholders in the district, including property owners, small business owners, large business owners, nonprofit partners, and the community at large. CIDBIA's ratepayer board members live, work, and play in Chinatown-ID. In addition to the stakeholders above, Sound Transit is also a current CIDBIA ratepayer, with assessment due on office space at Union Station.



Since its inception in 1995, CIDBIA has worked towards its mission of improving and promoting Chinatown-ID through four areas of work: sanitation, public safety, marketing and events, and advocacy. We work with stakeholders to supplement city services to beautify streets and sidewalks through litter pickup, biohazard cleaning, and removing or covering graffiti on historic and non-historic buildings. We work with businesses and residents to provide resources and help report crime, which has disproportionally affected Chinatown-ID over the last several decades. CIDBIA hosts several large, culturally significant festivals to promote businesses and celebrate the unique identity of the neighborhood. Each of CIDBIA's events brings thousands of visitors to Chinatown-ID each year. Creating a clean, safe, welcoming business district is critical in the economic vitality of small and large businesses in Chinatown-ID.

Most small businesses in Chinatown-International District are family owned and operated. The profile of small business owners are often immigrants or refugees, with limited English proficiency, and limited digital literacy. Chinatown-ID is primarily a restaurant district, representing foods from all over Asia. The neighborhood is a regional draw where customers can find foods, herbs, groceries, and more from their home countries. Many Asian-Americans in the region describe Chinatown-ID as a cultural hub where they have a sense of belonging. In addition to restaurants, the neighborhood is home to thousands of residents both young and old, predominately Asian, and low income. Residents of the neighborhood utilize other small businesses in the neighborhood, such as their doctor's office, pharmacies, herbal stores, and grocery stores, many of which cater to their non-Western cultures and spoken or written language.

In the past two years, the Covid-19 pandemic has created an untenable environment for small businesses to survive, let alone thrive. During this time, we saw businesses shut down dining rooms, operate with skeleton crews, and frantically apply for financial aid to make it to the next week or month. As Coronavirus gained traction in Asia, many local Asian businesses lost revenue before their American counterparts. Just months later, the neighborhood began to see a rise in anti-Asian violence, graffiti, and rhetoric. Prior to the Covid-19 pandemic, Chinatown-ID has experienced multiple years of negative impact from outside forces.

Government mandates and projects have shaped the identity and spirit of Chinatown-International District for decades, often without concern for the inhabitants, their safety and wellbeing, or their culture. Once a vibrant home to Seattle's largest Japanese population, the internment of Japantown residents with Order 9066 during World War II left a hole in the cultural identity of the neighborhood. With a rise in gentrification, Chinatown-ID's Black and Indigenous population were forced out of the neighborhood. Although making significant contribution to the landscape of the neighborhood, local government essentially erased the identity of Filipino Town through legislation. In the last decade, development has changed the landscape and population of Little Saigon, an area of settled refugees from Vietnam. Federal,



state, and city governments have shaped the neighborhood through projects such as the Interstate-5 construction, literally splitting the neighborhood in half. The neighborhood has experienced the construction impacts of the Kingdome, then Safeco Field, and then CenturyLink Field. Chinatown-ID has felt the pressure of construction impacts from the SR-99 deep bore tunnel, Seawall, Seattle Waterfront, and demolition of the Alaskan Way Viaduct in adjacent Pioneer Square. In recent years, the construction of the First Hill Streetcar impacted the neighborhood for years. Time and time again, government's role in implementing projects have come with a cost to Chinatown-ID, its residents, businesses, and its cultural identity.

It is with this history and our role as stewards of the current and future stakeholders of Chinatown-International District that we provide the following comments on the WSBL Draft Environmental Impact Study.

A. Impacts of Fifth Avenue Alternatives are existential for the Chinatown-International District

The DEIS describes and compares the impacts of the Fourth and Fifth Avenue alternatives. After carefully considering the DEIS analyses, we conclude that the impacts of the Fifth Avenue Alternatives are so great, they put many of the community priorities outlined in this letter at risk. Unless Sound Transit can identify another option that moves the construction impacts away from the cultural spine of the Chinatown-International District and/or identifies *substantial* mitigation to avoid or greatly minimize these impacts, we do not believe the Fifth Avenue Alternative and options are acceptable.

Construction of the Fifth Avenue Alternatives would be the most disruptive in the very heart of the Chinatown-International District. They would close key streets for commercial and cultural activity, including King Street and Weller, impacting access to retail businesses for customers and suppliers. They would create noise, dust, truck traffic, and visual impacts that would hamper or prevent community gatherings and activity in Hing Hay Park and other outdoor spaces and affect quality of life for hundreds of residents of Uwajimaya Village, Fujisada Condominium, Publix Building, and Bush Hotel. They would permanently displace the most on-street parking, which is of particular importance to the retail and small business environment in the Chinatown-International District.

While the potential opportunity for Transit Oriented Development associated with the massive disruptions created by the Fifth Avenue alternative and options may be enticing, the community would need assurance in the form of explicit legal commitments that these opportunities would be limited to only those who could ensure retention of community ownership of properties, and not make us more vulnerable to displacement and gentrification.



CIDBIA is the Seattle Department of Transportation permit holder for the Chinatown Gate, in partnership with the Historic Gate Foundation. The Chinatown Gate, located at the heart of the neighborhood on 5th Avenue South and South King Street, is the entrance to the neighborhood and signals to visitors they are in Chinatown. The Gate symbolizes culture, identity, and history for generations of Chinese immigrants who built the Chinatown area. The Gate is one of Seattle's most photographed icons and is used as a tool to market the neighborhood to help support small businesses. The 5th Avenue alternatives would at a minimum reduce visibility and accessibility to the Gate for residents and visitors. We also are concerned about the structural stability of the Gate with years of construction underneath it and around it on the street level.

B. Impacts and benefits from Fourth Avenue alternatives are not equally addressed

The Fourth Avenue alternatives would have direct connections to both Pioneer Square and Chinatown-International District neighborhoods and would facilitate more direct connections between transit modes such as Sounder, Light Rail, Amtrak and private buses. The Jackson Hub concept plans, as well as the community priorities listed in the beginning of this letter both emphasize the neighborhoods' advocacy for improving connections between the neighborhoods, improving the public realm, and activating the Jackson Hub area more intentionally. From our review of the information presented in the DEIS, there appear to be opportunities to realize long-held community goals and regional benefits from a Fourth Avenue alignment, but the analysis lacks the information we need to further understand these opportunities. For example, no formal visual quality analysis was performed for alternatives in the CID segment and there was no discussion of the Chinatown-International District and Pioneer Square as a complete, cohesive neighborhood. An actual visual quality analysis, complete with images and discussion, would allow us to see how station entrances and improvements along 4th Avenue South between S. Jackson Street and Seattle Boulevard would contribute to public realm goals. More visual representation of the scope and scale of proposed tunnel ventilation facilities would aid in our understanding about impacts to the public realm. It would also create an opportunity for Sound Transit to discuss opportunities to enhance connections and cohesiveness between the two neighborhoods in the Social Resources, Community Facilities, and Neighborhood conclusions. Without the more formal analysis, the beneficial impacts of the proposed project and alternatives are not explicitly disclosed and are hard for the reader to conclude.

Additionally, we believe re-activating Union Station to its original purpose as a train station would be a natural fit for this project. As in many large cities across the United States and in many parts of the world, the idea of a "grand central station" signifies a central location for transit, commuters, and accessibility. Union Station could serve as the entry point to Chinatown-International District, Pioneer Square, and Downtown. By serving as the location for



the new light rail station entrance, and a connection between the existing and proposed stations, the revived Union Station would be readied for further activation of the building for more public-facing uses.

C. The Deep Options do not support a 100-year vision for our neighborhoods

We do not believe the deep options—with their elevator-only access and longer transfer times—serve to support the neighborhood or the region. Even a bank of eight elevators will be unable to keep up with crowds during major events. In addition to football, soccer, and baseball games that bring more visitors to Chinatown-ID, CIDBIA attracts thousands of visitors to the neighborhood each year, including culturally significant events such as Lunar New Year. Mechanical problems are not unheard of in the Sound Transit network. Nor will they be viable if there is another global pandemic that makes it unsafe to ride in an elevator with a non-household member. We fear that most people coming to the area from other parts of Seattle or the region will choose to disembark or transfer at a different station with less onerous transfers, which would serve only as a deterrent, and not an attractant to our neighborhoods. The deep options would also make light rail transportation inconvenient for residents of Pioneer Square and the Chinatown-International District, greatly diminishing the Project's purpose and need.

D. Additional Questions and Concerns about DEIS Analysis

- 1. Inconsistencies between Racial Equity Toolkit and DEIS:** The Racial Equity Toolkit commits to an outcome of limiting harmful impacts of the Project and working with impacted communities to identify opportunities to repair past harm. It acknowledges the cumulative harm caused by decades of public infrastructure projects sited and constructed without centering the voices of people of color. Yet while the Environmental Justice analysis references these impacts in the narrative, it does not include them the documentation of the analysis that led to an Environmental Justice conclusion of no disproportionately high and adverse impact (Appendix G, Table 5-4, pages 5-31 through 5-66).

These cumulative impacts are a key concern for many residents and business owners in the Chinatown-International District and Pioneer Square, and they should be explicitly considered as part of the Environmental Justice analysis.

- 2. Need for Clarity on Construction Staging:** The DEIS discloses approximate amount of area necessary for construction staging areas and easements but does not show a construction footprint outline. The property impact maps provided in Appendix L.4 do



not indicate how the properties would be used or the extent of the use (i.e., full or partial acquisitions). Without more clarity on where construction staging would occur or the assumptions of property impacts for construction staging, we cannot adequately assess or compare the impacts of construction to the Chinatown-International District.

- 3. Noise Impacts:** The Noise and Vibration Technical Report states the following:
"Commercial and industrial districts are in the Chinatown-International District Segment... Although there are no nearby residential districts near the segment there are mixed use properties with residences in commercial districts, such as Uwajimaya and the Publix Hotel. Residential use properties within commercial districts are treated the same as commercial properties within the city of Seattle." (Appendix N.3, page 6-37)
While this may be acceptable by federal noise analysis standards, it is unacceptable from a racial equity standpoint. Sound Transit should conduct a complete operational noise analysis of impacts to residential properties—regardless of whether they are part of a mixed-use building—and commit to mitigation for those impacts.
- 4. Parking Impacts:** The cumulative impacts section of the DEIS asserts that changes to the transit system would reduce the need for parking in the study area. It further states that "the project would remove some of the residential and commercial land uses that created demand for this parking." (DEIS, page 5-7). We believe this conclusion is inappropriate without further consultation with Chinatown-International District and Pioneer Square residents and small business owners. In the Chinatown-International District feedback from community leaders indicate that short-term parking (on-street, <2 hour) is used by people making trips to the Chinatown-International District to shop, visit residents, dine in a restaurant, drive a senior resident to/from appointments, etc. Transit may not be an appropriate or reasonable alternative mode for many of these trips. We urge Sound Transit to conduct further public engagement on this topic and update its analysis in the final EIS to reflect the true impacts of parking losses—particularly on-street parking—for our neighborhood.

Conclusion

We recognize that Chinatown-International District is one component of a full ST3 program, one that is for the benefit of all regional users. In the spirit of advancing the project while advocating for our community, we suggest the following path forward:

Based on review of the current information, we believe that the CID-1a option offers the greatest potential to achieve the community priorities, create direct connections between Pioneer Square and Chinatown International District neighborhoods, and improve transit connections between modes. Furthermore, there appears to be more opportunity to minimize and mitigate traffic impacts through design, construction phasing and staging, and other



engineering technologies than have been studied for Fourth Avenue to date. We believe CID-1a comes the closest to delivering both local and regional benefit while protecting the cultural core of the Chinatown-International District neighborhood.

As we emerge from the most acute impacts of the COVID-19 pandemic, we hope Sound Transit takes the opportunity to better understand and address how adverse effects such as closures of commercial and cultural streets, displacement of businesses and residents, parking losses, construction noise and truck traffic, and other impacts could have on our community, especially in light of the decades of cumulative impacts of major infrastructure projects in Chinatown-International District and Pioneer Square. Infrastructure projects such as this once-in-a-lifetime West Seattle Ballard Link Extension is unfortunately not once in a lifetime for many in Chinatown-International District. We ask the Sound Transit board to consider the impacts to one of the region's most special, unique, and fragile communities and the residents and businesses who call it home.

Sincerely,

Monisha Singh

Monisha Singh

Executive Director

Chinatown-International District Business Improvement Area

Sound Transit Projects

Details	Communication
#503399 Date Recieved: 4/25/2022 Created by: Cecelia Gunn Audience: General Public Reach: Participation: Engagement: Source: Email Assigned division: Outreach Category: Project Phase: Planning Project Segment: Environmental phase: Draft EIS	<p>Dear Sound Transit Board,</p> <p>I am writing today in response to the West Seattle and Ballard Link Extension (WSBLE) Draft Environmental Impact Statement (DEIS) with a particular focus on the South Lake Union station.</p> <p>Civic Hotel has been serving the community since 1962. Even during a pandemic due to Covid it is still serving the community. The local BIPOC family that owns the hotel has temporarily converted the building into an emergency shelter with King County. Not only has it been helping to house our homeless population during this pandemic, it has also helped and allowed a number of people to transition into permanent housing. Which has been documented in the University of Washington study. It is the type of business we want to have in our community that will be displaced.</p> <p>To acquire and destroy this property, you would be displacing the livelihood of a family of color that not only works in the city, but also lives in the city. You would be destroying one of the few last remaining buildings that is still family owned and operated and forever changing the fabric of the neighborhood.</p> <p>Further, this route also negatively impacts access in and around Seattle and South Lake Union. The off ramp from SR-99 onto 7th Ave N already creates a backup on SR-99 all the way up to Ship Canal Bridge, and traffic wanting to merge onto SR-99 N and S backs up all the way down 6th Ave N and 7th Ave N. As the population continues to grow and offices start to bring back employees, this will only get worse. To block the intersection of 7th Ave N and Harrison St for 18+ months off and on, means you will be blocking the off ramp on SR-99 S before entering the Bore Tunnel and the onramp to SR-99 N.</p> <p>This will have a considerable negative impact on traffic congestion given the route blocks access to a major freeway and will only push street traffic back to Mercer and Denny, two roads that are already heavily congested.</p> <p>Request:</p> <p>Acquiring the Civic Hotel should be a non-starter for the South Lake Union station. Not only because it will be displacing one of the last few family owned and operated businesses in South Lake Union, but the adverse traffic impacts during and after construction are untenable for the neighborhood and the region.</p> <p>Advance the Harrison Street station by exploring alternative locations such as the corner of 5th Ave N and Harrison St and the corner of 7th Avenue N and Thomas Street. Alternative options that don't displace minority owned local businesses should be considered and locations that avoid large traffic impacts during construction. Especially traffic impacts that block access to SR-99, I-5, and the East West arterials in the city (Mercer St, Harrison St, Denny St, Madison St).</p> <p>Sincerely,</p> <p>Neha Nariya</p> <p>--</p> <p>Neha Nariya Civic Hotel</p> <p>325 7th Avenue North Seattle, WA 98109 0: (206) 466-2890 x102 www.civicseattle.com</p>



334 1st Ave N
Seattle, WA 98109

April 27, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
Via e-mail (WSBLEDEIScomments@soundtransit.org)

RE: Comment on West Seattle and Ballard Link Extensions Draft Environmental Impact Statement

Climate Pledge Arena is grateful for the opportunity to provide feedback about the proposed Uptown/Seattle Center station and alignment as part of the West Seattle Ballard Link Extension (“WSBLE”) Draft Environmental Impact Statement (“DEIS”). We want to start by recognizing and expressing our appreciation for the incredible amount of time and energy that the Sound Transit staff have put into meeting with the Uptown neighborhood. This has included multiple workshops and meetings for the surrounding stakeholders, Seattle Center, and its Resident Organizations. These meetings have been valuable resources for Climate Pledge Arena and the entire community. We believe both the community and Sound Transit have been successful at listening to one another's concerns while trying to build consensus toward a common goal: to bring excellent transit service to our neighborhood with the least amount of disruption or impact.

Seattle Center is an essential community “third place”—neither work nor home but a place of refuge, with a legacy of unmatched cultural significance, in the heart of our city. Climate Pledge Arena is proud to be the newest Resident Organization on its campus. The Seattle Kraken join the Seattle Storm as anchor tenants in the Arena and together we celebrate being part of the modern revitalization of Seattle Center and furthering the Century 21 mission set forth in 1962.

Climate Pledge Arena is a complete redevelopment of a historic landmark, which is listed on the federal, state and local registers of historic places and qualifies as a Section 4(f) property under the Department of Transportation Act of 1966. The Arena was originally built for the 1962 Seattle World’s Fair and is home to the NHL’s Seattle Kraken, WNBA’s Seattle Storm, and some of the world’s biggest live music and entertainment events. Annually, Climate Pledge Arena hosts 200 events and more than 2.2 million patrons, with our largest events bringing more than 17,000 patrons to the arena.

Climate Pledge Arena has a strong commitment to effective public transit, and we support the planned Sound Transit light rail extension to bring patrons to the Seattle Center campus. From the start, we have worked closely with the City and our partner Seattle Monorail to provide multi-modal transportation options for this unique neighborhood that allow for safe and efficient travel to and from the Arena, while minimizing the impact on the neighborhood. Sound

Transit's WSBLE is the next phase in this endeavor, and we welcome it wholeheartedly and hope that major strides can be made to speed up the timeline of delivery back to the original date of 2035. We also welcome the opportunity to join other stakeholders in providing input in the station planning as we recognize the value of this once in a century opportunity to do this right. It is in this spirit that Climate Pledge Arena offers the following comments.

Climate Pledge Arena is concerned that the DEIS has not fully considered how to design the Uptown/Seattle Center station to allow for more efficient use of the station by Climate Pledge Arena patrons, fails to fully capture the existing conditions of Climate Pledge Arena, does not adequately analyze impacts on Climate Pledge Arena, and does not provide mitigation for these impacts.

1. Station Location

Sound Transit, Seattle City Staff, and several other consultants have identified an alternative that would shift the station slightly further west along Republican between 1st Ave N and Queen Anne Ave. This alternative was identified as Alternative C in Sound Transit's April 8, 2022 presentation. This shift in station location will allow patrons of our venue, Seattle Center and the surrounding businesses to access a station in close proximity to campus, while decreasing the impacts on the Arena and Seattle Center. This new proposed location would reduce the collective impacts on Resident Organizations and Seattle Center as a whole. We're grateful for the creative thinking of this proposed new location and we strongly support further review of this station relocation.

2. Station Design and Operations

Should Sound Transit decide to retain the Uptown/Seattle Center station in the location proposed in the Preferred Alternative, Sound Transit should consider refining the design to add pocket tracks at the Uptown/Seattle Center station. Pocket tracks would help to manage major events at Seattle Center by aiding in "sweeping the platform" to improve post-event transit ridership and reduce queueing.

The DEIS does not delve deeply into how the proposed location will serve as an event station at Seattle Center. Sound Transit staff acknowledged recently that light rail service, including station operations, as a standard and normal practice, does not consider surge events when there is a significant spike in demand for transit service or station usage. The Uptown/Seattle Center station services Climate Pledge Arena, major cultural institutions in Uptown, and the numerous fairs, festivals and activities happening on campus—all activities which contribute to regular post-event ridership surges, which should be considered when planning and designing this station location.

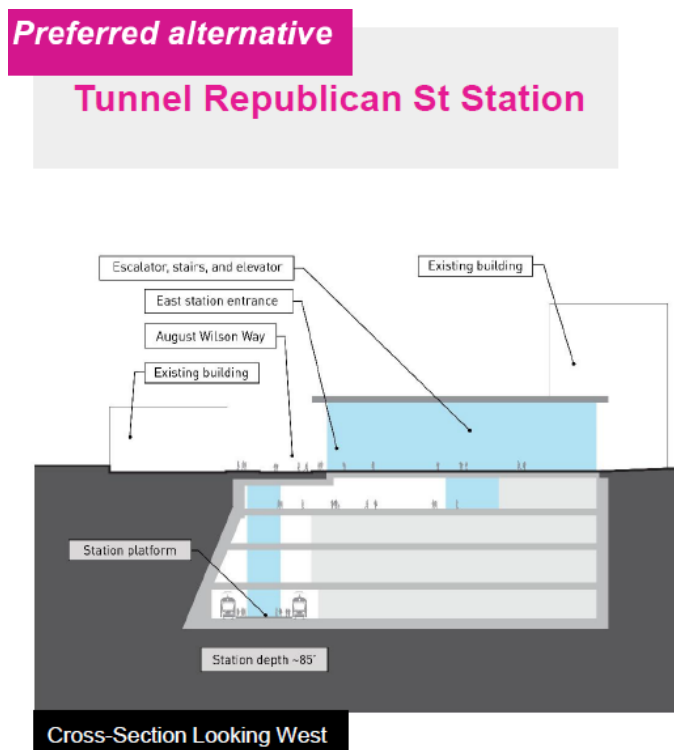
Sound Transit should also explore more frequent headways for evening/late night service. With an expected 8,000+ light rail riders for every Arena event once the Uptown/Seattle Center station is complete, Sound Transit's current plan for 15 min headways with an existing train capacity of about 800 people would result in wait times over 2 hours to depart the Arena using light rail. If Arena patrons have to wait up to 2 hours post-event to catch a train home, they are unlikely to use light rail and an opportunity to increase ridership will be lost.

Additionally, Sound Transit should consider working with the City of Seattle to provide festival street treatment on Republican between 1st Ave N and Queen Anne Ave. A festival street in this location would provide necessary post-event queueing space since the platform and station box will not be able to adequately stage enough people to handle a post-event surge. Such a street configuration will be needed to manage passenger volumes during post-event surge travel times.

3. Construction and Operations Impacts Not Considered in the Draft EIS's Analysis of the Preferred Alternative

The DEIS does not consider a number of important and serious construction and operations impacts that will be associated with the Uptown/Seattle Center station and the light rail alignment for the Preferred Alternative's station location.

Impacts to Arena's Structural Integrity. Construction of the Uptown/Seattle Center station in the location proposed in the Preferred Alternative may have impacts on Arena tiebacks—elements critical to maintaining the Arena's structural integrity. The Arena is predominantly a below-grade structure surrounded by foundation walls that are held in place by tiebacks that extend outward from all foundation walls. On the north end of the Arena, these tiebacks extend from behind the foundation walls outward beneath the plaza between the Arena and the Northwest Rooms. The angle of the station box, as depicted in the figure below, has the potential to cut into those tiebacks.



Climate Pledge Arena is concerned about any design or construction method that involves placing structures or excavations at a 45-degree angle underneath the courtyard north of the Arena. If the tiebacks to the Arena are impacted, the structural stability of the Arena will be in

jeopardy and the building's roof and glass curtain walls will be at risk of damage. The roof and glass curtain walls are character-defining features of the building that contributed to the Arena's listing in the national, state and local registers of historic places.

Construction underneath the Northwest Rooms also runs the risk of impacting the footing for the north buttress of the Arena, which is also a character-defining feature of this historic building and which holds up the roof. The footing for the north buttress extends below-grade into the courtyard North of the Arena and ties into the building's foundations in this area. Any impact to the north buttress could have disastrous consequences for the Arena and, by extension, the Resident Organization structures immediately north of the Arena.

The DEIS does not consider the potential structural impacts to the Arena from project construction, nor does it consider the project's potential impacts on this historic built-environment and Section 4(f) resource. Sound Transit should analyze how construction and operation of a station in this location will impact the Arena's tiebacks, the North Buttress, and the structural integrity of the historic Arena. Sound Transit will bear the responsibility for compensating Climate Pledge Arena should the tiebacks or other Arena infrastructure be impacted during project constructions or operations.

Construction Means and Methods. The DEIS also lacks some critical information surrounding means and methods of construction and mitigation. The projected timeline of construction is more than double that of the construction timeframe required to build Climate Pledge Arena and could result in the permanent displacement of existing organizations and businesses at Seattle Center. With cultural organizations and businesses struggling to rebound from the pandemic, putting them again at risk without further review and mitigation in place is irresponsible.

The DEIS also fails to analyze the impacts of the cut and cover construction method and to provide alternative construction methods. Cut and cover construction produces significant noise and alternative methods such as mining should be considered to mitigate the impact. The DEIS should evaluate options for this area where music and theater events are the lifeblood of the organizations on Seattle Center campus.

Vibration and Noise Impacts. Construction of the Uptown/Seattle Center station as described in Preferred Alternative abuts the Northwest Rooms to the north of the Arena and eliminates most of the streetscape on Republican between Warren and 1st Ave N. Based on our experience with building the Arena, construction of the station box without appropriate mitigation measures will likely have noise/vibration impacts on the Arena and buildings in the surrounding area, including, but not limited, to KEXP, SIFF, The Vera Project, Seattle Rep, Cornish Theater and the businesses and tenants in the apartment building to the north. The DEIS does not provide an adequate analysis of these impacts during construction or operations and as described below, does not include adequate mitigation.

4. Draft EIS Lacks Adequate Mitigation

- The DEIS does not include adequate mitigation measures for the traffic, noise and vibration impacts of the project. **Traffic Plan.** To mitigate the identified traffic impacts, a transportation mitigation plan that maintains movement of Mercer traffic and

circulation in and around the Arena during construction and once operational should be developed. The traffic plan should offer multi-modal options that maintain safe and efficient access to the businesses and cultural venues in the surrounding area.

- **Passenger Flow/Crowd Management Plan.** The DEIS does not include adequate information about how the proposed location will serve as an event station at Seattle Center. Section 4.3.17.5.4 identifies indirect impacts from queueing post events, but does not identify mitigation. A passenger flow/crowd management plan that identifies crowd circulation to reach station entrances following large events should be developed in conjunction with Seattle Center and SDOT. Event surges such as the ones experienced now should be considered when planning and designing this station location. Also, as discussed above, Sound Transit should consider creating a festival street on Republican Street to mitigate these indirect post-event queueing impacts at the Seattle Center Station.
- **Noise/Vibration:** Sections 4.3.7.3.3 and 4.3.7.4.1 identify noise and vibration impacts during construction and operations, but offer no mitigation. Given that the vast majority of the Arena is below-grade and that the station box will be constructed adjacent to Arena tiebacks and foundation walls, we request additional analysis on noise and vibration impacts to the Arena be conducted and sufficient mitigation identified to prevent structural damage to the historic Climate Pledge Arena and to prevent operations at the Arena from being impacted from construction and operational noise.

Future Coordination

Given that Climate Pledge Arena guests will be significant users of the planned Uptown/Seattle Center station, we would appreciate the opportunity to coordinate with Sound Transit during the design, construction and operations phases. With our experience in managing patron ingress and egress to the Arena and our recent construction experience in this neighborhood, we believe we can serve as a valuable resource for Sound Transit throughout all stages of this project. We look forward to working with you in the future.

In addition, Climate Pledge Arena strongly supports the requests from our surrounding neighborhoods and Resident Organizations for further understanding of impacts to critical cultural institutions in and around Seattle Center. These cultural institutions represent the ecosystem of the Seattle Center campus and are a source of immense pride for our neighborhood, city and the Puget Sound region as a whole.

We are encouraged by Sound Transit's outreach and planning work to date and suggest that the agency consider forming a Seattle Center Coordinating Committee before project construction begins to address the various issues Seattle Center stakeholders will have as this project progresses.

Conclusion

Climate Pledge Arena supports Sound Transit and the Federal Transit Administration in bringing light rail service to Seattle Center. We look forward to further discussion surrounding the WSBLE and thank you for your attention to our input and concerns and those of our neighbors. The strong collaboration with Sound Transit surrounding this location will serve us all well and will set it up for success.

Thank you for the opportunity to provide these comments. If you have any questions regarding these comments, please contact us at rjohnson@climatepledgearena.com.

Sincerely,

A handwritten signature in black ink that reads "Rob Johnson". The signature is written in a cursive, flowing style. The first name "Rob" is written with a large, stylized "R" and "o". The last name "Johnson" is written with a large, stylized "J" and "n". The signature is underlined.

Rob Johnson
VP of Transportation and Sustainability
Climate Pledge Arena

April 28th, 2022

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

Dear Sound Transit Board and ST3 Planning Staff,

As a business in Central Ballard, I am requesting further study be completed on an ST3 station that serves Central Ballard. The proposed Ballard Station locations on 14th Ave NW and 15th Ave NW, and NW Market St are located too far away from Central Ballard to effectively serve the majority of residents, businesses, and nightlife. The core of the Ballard urban village is centered between 24th and 15th Avenues NW, so 24th Avenue must be served equally as 15th Avenue.

20th Station ranked higher for Sound Transit's key performance metrics in early study work including the most important metric: ridership. Construction of Ballard station will be a major disruption to the area, we need to make sure that the benefit is shared with the most residents, visitors, workers, and businesses possible.

Proposed 14th and 15th Avenue NW stations mean that many businesses on Ballard Ave, Market Street, and the 24th corridor will not share in the benefits of this infrastructure investment. Transit works best when it's convenient, and the proposed stations simply aren't close enough to Central Ballard. Sample walking times make this point clearly, most people will not choose to walk this far on a regular basis to visit our businesses:

- 13 minute walk from 14th Avenue NW and Market Street to Ballard Avenue and Market Street.
- 11 minute walk from 15th Avenue NW and Market Street to Ballard Avenue and Market Street.

Further, Industrial zoning and jobs must be preserved around 14th and 15th Avenues NW. Industrial zoning around 14th and 15th Avenues NW stations should not be counted as expected future Transit Oriented Development ridership potential. The case for a station around 14th or 15th is largely based on places that don't exist yet. We need Sound Transit to focus on the businesses and people that already make Ballard a great place to live, play, and do business.

We are requesting Sound Transit complete a full study of a 20th Avenue NW station to fully understand how best to serve the majority of Ballard's businesses, nightlife destinations, residents, and the neighborhood as a whole. We look forward to seeing Sound Transit better serve our Ballard community with a light rail station within a 5-8 minute walk of all Ballard Avenue businesses that ultimately values riders' time and increased support for small businesses.

We are also requesting that Sound Transit build the Ballard station with the intention of future expansion from Ballard to both the north towards Crown Hill and Northgate, and to the east towards the University of Washington and Sand Point.

The business names listed below from Ballard's small business community request Sound Transit reopen study of a 20th Ave Station with the Draft Environmental Impact Statement's Thorndyke Tunnel Portal in Interbay.

We strongly request action on behalf of our community's united stance as outlined above.

Signed,

The National Nordic Museum
Harries Hat
MacCleod's Scottish Pub
Ballard Smoke Shop
Bar Sabine

Shiku Sushi
Gracia Cocina Mexicana
Percy's and Co
India Bistro Ballard
Paxti's Pizza

White Lotus
The Noble Fir
Parish NW
Ballard Consignment
Sunset Tavern

Simple and Just
Soaring Heart
Lucca Great Finds
Ballard Loft



WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift

Sound Transit

401 S. Jackson St.

Seattle, WA 98104

Email: WSBLEDEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of GC Columbia LLC, which is the owner of the property located at 701 5th Avenue (TPN 0942000640) (the "Property") to provide comments on the Draft EIS for the WSBLE project. The Property is the site of the Columbia Center.

We support the WSBLE project and look forward to the enhanced transit accessibility it will bring to this portion of Downtown.

However, we are concerned regarding the planned street closures associated with the WSBLE project. Long-term closures of Cherry Street and 4th Avenue will create significant congestion issues in and around this neighborhood. The Draft EIS should do more to define the location, sequence and duration of these closures, and evaluate the effect of these street closures on the viability of access to the Columbia Center and other major buildings in the vicinity. This portion of Downtown is the home to millions of square feet of office development and tens of thousands of jobs; accessibility to the buildings that house these jobs is critical to vitality of Downtown.

For these reasons, Sound Transit should undertake a more careful review of the proposed street closures and propose mitigation to ensure the maintenance of access throughout this area of Downtown during construction of the WSBLE project.

We appreciate the opportunity to provide these comments.

Sincerely,

Adam Bowser

Insert shipping document here.

705-9

ORIGIN ID: BFIA
ADAM BOWSER
GAW CAPITAL USA
701 5TH AVENUE
SUITE 4000
SEATTLE, WA 98104
UNITED STATES US

(206) 386-5151

SHIP DATE: 12APR22
ACTWGT: 1.00 LB
CAD: 252592820/NET4460

BILL SENDER

TO C/O LAUREN SWIFT
WSBLE DRAFT ENVIRONMENTAL IMPACT
SOUND TRANSIT
401 SOUTH JACKSON STREET
SEATTLE WA 98104

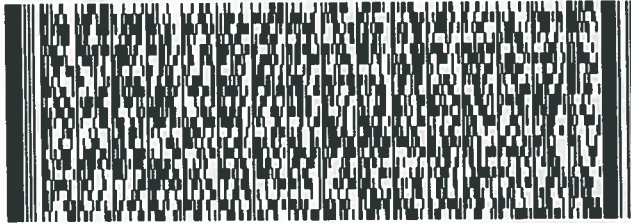
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Downtown
Seattle
Association

April 28, 2022

WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift

Sound Transit

401 South Jackson Street

Seattle, Washington 98104

Sent via electronic mail to WSBLEDEIScomments@soundtransit.org

Dear Ms. Swift,

By way of this letter, the Downtown Seattle Association (DSA) is submitting comment on the Draft Environmental Impact Statement for the West Seattle and Ballard Link Extension (WSBLE). The DSA represents some of the largest employers in the state, along with hundreds of small businesses, non-profit and arts and cultural organizations and a residential population of nearly 100,000 - making our neighborhood larger than all but a handful of cities in Washington State. We are Seattle's epicenter of jobs and economic activity and the Puget Sound region's hub for arts, entertainment, professional sports, and tourism.

The DSA has long been a vocal supporter of transit infrastructure projects generally, and of Sound Transit in particular. Downtown Seattle has directly benefited from regional transit investments, without which downtown's growth would have been constrained by traffic congestion and deleterious environmental effects. Pre-pandemic, downtown Seattle had become one of the most dynamic and fastest growing urban centers in the nation, and increased investment in our region's transit system was a key factor in enabling that achievement.

However, it is important to note that downtown Seattle also bears the scars of capital projects that produced long-lasting impacts that were not adequately mitigated or minimized through better urban planning. Even

now, some would say that Third Avenue has never fully recovered from the impacts of closures and intense surface-level disruption associated with constructing the Downtown Seattle Transit Tunnel more than 30 years ago. As the densest urban center in the Pacific Northwest, downtown Seattle's compact built environment, heavy community utilization and outsized concentration of all types of businesses make it particularly sensitive to construction impacts - impacts that can ripple far outside of the commonly accepted borders of downtown.

The following comments on the Draft Environmental Impact Statement (DEIS) are made with DSA's strong enthusiasm and support for the WSBLE but also with our sincere concern that construction methodologies be properly explored to minimize impact on businesses, residents, workers, and visitors and that those impacts which are unavoidable are adequately mitigated.

General Construction Comments and Requests

Comment 1: Much more information is needed to truly understand cumulative construction impacts. This includes but is not limited to information on station and tunnel construction timing and phasing throughout the WSBLE project; street closure phasing and duration; and plans for pedestrian, transit and traffic detours. Operating without this base-line level of information for all alternatives makes it virtually impossible to make informed decisions on a preferred alignment.

Comment 2: Adequately and transparently study all potential station and tunnel construction techniques through downtown. While the DEIS includes statements indicating that either a single-bore or a dual-bore tunnel through downtown is under consideration, it appears that only dual-bore construction has been analyzed and indeed in meetings throughout the DEIS comment period, Sound Transit staff have presented only dual-bore and cut-and-cover options. It seems employing a single-bore tunnel methodology could present different station access and

construction opportunities and could potentially minimize anticipated impacts at surface-level, but it is not possible to assess the trade-offs of either method - both positive and negative - without more information.

Request: We ask that Sound Transit examine the single-bore tunnel method through downtown to identify:

- a. The difference in impacts to downtown produced by different construction methods;
- b. Construction timing, duration and phasing differences presented by different construction methods;
- c. Changes to station profiles that differing construction methods would either allow for or necessitate.

Alternatively, if Sound Transit has already studied all possible construction methods we ask that the findings be made public and information shared on how the Agency landed on dual-bore as the only feasible option.

Comment 3: Study alternative approaches to station design and footprint in downtown. Downtown's built environment is densely developed and heavily utilized. Large station headhouses that may be more easily accommodated in other parts of the region create an outsized impact in downtown - not just during construction, but in perpetuity.

Request: We ask Sound Transit examine station designs in downtown that:

- a. Creatively and positively integrate into the existing built environment with a focus on employing successful urban design principles;
- b. When feasible, incorporate station entrances and structures into existing properties and find ways to turn necessary new

infrastructure into community and/or property assets as an alternative to full condemnation;

- c. At bare minimum ensure station configuration and footprints are tailored specifically to support a dense urban core environment.

We urge Sound Transit to look at station design not through a simple “do no harm” lens, but rather as an opportunity to find creative ways to add to the fabric of the built environment or elevate current urban design.

Comment 4: Work with the community to develop performance standards for construction impacts before contractors are selected. DSA understands why contractors prefer flexibility. We also understand that Sound Transit may likely benefit from a lower-cost bid if fewer stipulations are placed on contractors. However, it is the community that bears the brunt of lower-cost construction methods that may create untenable impacts.

Request: We urge the agency to work with community members - starting now - to identify and articulate acceptable parameters and guardrails for construction impacts on existing properties, arts and cultural uses, employers and workers, traffic, transit riders and pedestrians - before contractors bid on the work for WSBLE.

General Impacts and Mitigation Comments and Requests

Comment 5: A thorough mitigation plan must be developed for this segment of the WSBLE. It is not possible for DSA to comment on the efficacy of proposed detailed mitigation plans in the absence of such plans.

Request: We encourage Sound Transit to convene a steering committee of downtown stakeholders to participate in an adaptive process to make mitigation recommendations and/or react to Agency-proposed mitigation measures under consideration. The

DSA and our members and stakeholders stand at the ready to participate in an iterative, productive dialogue with Sound Transit on effective, robust mitigation plans.

Comment 6: For the purposes of accurately identifying construction impacts and to inform a mitigation plan, it is imperative that Sound Transit have an up-to-date understanding of the built environment around the alignment. DSA has witnessed agency presentations and planning materials that are very dated, including maps and satellite images still showing empty parking lots that were replaced years ago by 40-story buildings holding thousands of workers or residents. We implore Sound Transit to coordinate with the City of Seattle's Department of Construction and Inspection to obtain an accurate landscape of development projects permitted and anticipated to be constructed prior to WSBL ground-breaking. Any assessment of construction impacts and needed mitigation is incomplete - or worse, inaccurate - without a real-time understanding of the built environment.

Comment 7: Much more information is needed on the transportation impacts of alignment alternatives, including proposals for re-routing traffic, transit and pedestrians during identified extended periods of right-of-way closures. It is the view of the DSA that identification of street closures provides only a fractional view of the transportation impacts needed for evaluation of alternatives. Transportation and mobility impacts extend well beyond the immediate proximity of street closures, but these impacts can only be understood and evaluated by knowing where and how traffic, transit and pedestrians will be rerouted away from proposed street closures.

Request: In addition to more thoroughly understanding the impacts described above, we ask that Sound Transit describe plans for maintaining vehicular, pedestrian and delivery/loading dock access to buildings in those instances in which a street closure effectively

walls off a building's only access point for one or more of these modes.

Comment 8: As construction impacts and needed mitigation are refined, please ensure that the unique needs of arts, cultural and entertainment venues are considered. Downtown Seattle is proud to be home to many of the region's cherished arts, cultural, and entertainment venues. These venues have needs and usage rhythms that are different than the typical commercial office, including higher utilization during evenings and weekends and increased sensitivity to noise and other disruptions. Please consider that traditional mitigation efforts, such as concentrating noise, access and construction disruption outside of normal business hours may have a disproportionately negative effect on the arts and entertainment industry due to performance and rehearsal schedules.

Station-specific Comments and Requests

While many of the above comments apply to multiple station locations, the following comments are unique to specific stations within the DSA's area of focus.

Midtown Station

Comment 9: Alternative access to Midtown station.

Request: Given the upward slope from 4th Avenue to 6th Avenue at this point of downtown, we ask that Sound Transit explore the feasibility of accessing the Midtown Station via a horizontal tunnel and assess how this method would change other aspects of the Midtown Station construction and profile.

Westlake Station

Comment 10: Since 2015 DSA has been responsible for the management of Westlake Park through an agreement with Seattle Parks and Recreation. Sitting at the epicenter of downtown's retail and transit core, the park is a unique recreation experience for hundreds of thousands of visitors, residents and workers every year. Guided by a vision to create a vibrant, bustling, welcoming space we've worked hard to activate the park with events, games, music, food and family-friendly activities along with hiring dedicated staff and security to ensure the park is clean, safe and cared for.

Additionally, it is no secret that Third Avenue - particularly along Pike and Pine Streets - has long been plagued by public safety challenges and the COVID-19 pandemic has only exacerbated these issues. Since the beginning of 2022, we have seen conditions begin to improve with a renewed focus from the City on increased police presence, activation efforts and potential plans for streetscape and improvements to the built environment that will in the long-term contribute to maintaining stability along one of the busiest thoroughfares in our downtown core.

Request: We urge Sound Transit to take a holistic view when planning construction areas and street closures on 4th Avenue and Pine Street. Sound Transit should consider how these impacts would affect the surrounding area and commit to not hampering recent public safety and activation efforts by isolating one of our city's most challenging areas from the rest of the downtown retail core. Engaging with King County Metro, the City of Seattle, the King County Regional Homelessness Authority and other similar stakeholder organizations, Sound Transit should analyze construction impacts in that area in particular through a behavioral health and public safety lens. Thought should be put into how this project - in the short term - impacts the experience of Westlake Park and - longer term - how this station could integrate into and bring additive benefit to the park.

Denny Station

Comment 11: The proposed 4-year closure of Westlake for DT-1 Denny Station is untenable. Based on available information, the traffic and transit impacts of the closure of this major intersection for 4 years on downtown workers, transit riders and residents does not appear mitigable. If Sound Transit continues to consider this option, a detailed plan for traffic management; transit-reroutes that maintain full-service levels; and building access must be developed to demonstrate whether and how this closure could be acceptably mitigated. DSA does not support a construction scenario that requires a multi-year closure of the South Lake Union Streetcar or other similar transit service reductions.

Comment 12: Study the feasibility of a mix and match option connecting Denny DT-2 (Terry Avenue) to South Lake Union DT-1 (Harrison Avenue). DSA has heard overwhelming support from our membership for these two stations locations, and little to no support for the alternatives. It appears through information currently available in the DEIS, that placing the Denny Station at Terry Avenue would avoid the unmitigable, dramatic closure of Westlake Avenue and we strongly support that option.

Request: If the sole obstacle to connecting these two stations is the proposed placement of a crossover track to be used during service disruptions, we urge Sound Transit to explore alternative locations for the crossover track and ask that the operational impacts of an alternative location for the crossover track be made public so that the community and the Sound Transit Board can have a clear understanding of the tradeoffs for enabling the connection of the two most optimal station locations at Denny and SLU.

South Lake Union Station

Comment 13: DSA has a strong preference for SLU DT-1 - Harrison Street.

The South Lake Union neighborhood is home to a growing residential population and a thriving technology and employment hub. It's compact nature and unique mix of pedestrian-oriented infrastructure and heavy transit usage by residents and commuters mean that construction impacting transportation systems in this area will be particularly disruptive. The South Lake Union Station will provide critical transit connections to downtown and SR 99 so it is imperative that this station is accessible, convenient to get to and centrally located within the neighborhood. SLU DT-2 - Mercer Street does not sufficiently meet these criteria; it puts the station outside of neighborhood boundaries and accessibility and safety is jeopardized by essentially forcing pedestrians and riders to interact with some of the most heavily trafficked roads in the city (SR 99 and Mercer Street).

DSA does not support SLU DT-2 - Mercer Street as currently configured and urges Sound Transit to connect Denny DT-2 at Terry Avenue to SLU DT-1 at Harrison Street. However, while DSA supports SLU DT-1, a detailed transportation mitigation plan is needed to maintain mobility and property access throughout the closures necessitated by the Harrison Street station alignment.

Conclusion

Thank you for your attention to the Downtown Seattle Association's comments, requests, and questions. We stand ready to assist Sound Transit with the items in this letter that require collaboration and we continue to value the partnership we have enjoyed with the agency over

the decades. DSA looks forward to the promise of clean, reliable, rapid mobility that the West Seattle to Ballard Light Rail extension will bring to downtown, the city and the region.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Scholes". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jon Scholes
President & CEO
Downtown Seattle Association

Cc: City of Seattle

Sound Transit Projects

Details	Communication
#503565	Greetings from Ray and Sue Mooers,
Date Recieved: 4/25/2022	We are the owners and founders of Dusty Strings Company, a 43 year-old artisan musical instrument manufacturer located in the heart of North Interbay at 3450 16th Ave W. In January, we were informed by Sound Transit that the home of our business is directly in the path of several of the track options being considered in the WSBLink expansion through Interbay. Recognizing that it is a monumental task to plan a project like this and to consider all the implications of the various route options, we want to introduce ourselves to you as more than a "white square" on the satellite map of North Interbay and ask that you consider route IBB-1b.
Created by: Cecelia Gunn	Starting from a home-based, grass-roots entrepreneurial spark, we initially developed a local and regional following for the unusual instruments we designed and made: hammered dulcimers. Due to the growing demand for these instruments, we found a commercial space to lease in the basement of a building in the center of Fremont's business district at 3406 Fremont Ave N. and set up the new shop there in 1982.
Audience: General Public	Business grew and we continued to find more local craftspeople to help build Dusty Strings hammered dulcimers and, soon, lever harps.
Reach:	
Participation:	
Engagement:	In 1997, we were shocked to be handed a letter from the Seattle Fire Department saying that we had to cease our spray finishing operations because of a little known regulation that did not allow this in a basement. After 15 years of safely operating a fully permitted spray finishing operation, we were told to cease within 30 days. This set into motion a 5 year process, negotiated with SFD, to re-locate our manufacturing business. Employing the help of a real estate professional, we searched within the Seattle city limits for a suitable building but found nothing that would meet our needs. Nor would anyone offer more than a 5 year lease. A chance drive into the Interbay's industrial zoned area, revealed an undeveloped parcel for sale. We changed our focus, found financing, and purchased our current property. Our agent convinced us to build a building larger than what we required, to include office spaces to lease, in order that Dusty Strings' marginally profitable business would not have to bear the entire cost of the building. We planned and built our "forever" home to ensure we would never be displaced or rendered unable to afford rent.
Source: Email	
Assigned division: Outreach	
Category:	
Project Phase: Planning	Now, some 20 years after our move to this location, we are faced with another major disruption in the possible condemnation of this custom manufacturing facility. To be completely clear, this building was entirely purpose-built to fit our musical instrument manufacturing business. We fabricate our precision components from hardwood lumber, assemble the instrument components, sand, spray finish the sub-assemblies, install hardware and custom in-house made strings, perform final assembly, test, package and ship. Basically, we turn raw wood into beautiful sounding works of art for customers worldwide to enjoy. Our office, admin and showroom functions are located here as well. Here is our website and a photo of some of the harps that we manufacture is attached above:
Project Segment:	www.manufacturing.dustystings.com
Environmental phase: Draft EIS	<p>We have worked our entire 43 year history building up this business , making over 40,000 instruments, employing many skilled artisans in this endeavor. Our focus has been on keeping the business in Seattle for the benefit of our staff, some of whom have been with us over 30 years. Our customers are not just local, but also regional, national and international. We are part of the vanishing species of light manufacturing employers in Seattle. We were extremely fortunate 22 years ago in finding property on which to build a " home" that would work. After the building was constructed, it took six months and \$350k to outfit the new space with the necessary systems and infrastructure, and we had years to prep for the move itself. The cost and time-frames for doing so now would be much higher and longer. And, we know that finding a new location, on a short time-frame, that would allow us to keep our skilled people and continue our business without harm is unlikely.</p> <p>We strongly advocate for the elevated 14th Avenue option (from 15th/Prospect), also named IBB-1b. This choice would leave us and several other industrial-zoned properties intact in the heart of Interbay. It would also utilize a major section of a public right-of-way for cost savings and eliminate disruption in the core of this area.</p> <p>On April 2nd, we met with Alexis Lair and Emily Yasukochi to propose another solution that might save our building (and 4 or 5 others)): a potential revision of the track route of IBB-1a, running this elevated route further North along the 17th Ave W/Thorndyke Ave W right-of-way and turning it to cross into the center of the Read Products property (BD2382) at 3615 15th Ave W) to continue on its planned path northward. Hand drawings of the preferred options as well as our proposed revision idea were overlaid on satellite images of the area. These should be in your possession now, so we are not attaching them again here. To reiterate what we told Alexis and Emily, Mr Chuck Read told me personally that he would gladly endorse this revision because he is planning to move his business out of the city regardless.</p> <p>We consider light rail an important need in Seattle, and voted for it every time it came on ballot. We have some inkling of the difficult task you have, and appreciate the opportunity to provide some background and significance to a particular parcel on your maps.</p> <p>Respectfully submitted,</p> <p>Ray and Sue Mooers</p> <p>Co-owners of Dusty Strings Co.</p> <p>Ray and Sue Mooers 1848 NE Ravenna Blvd. Seattle, WA 98105 206-523-7988 raymooers@comcast.net</p>



April 20, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104
Email: WSBLEDEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

Elliott Ave 1 LLC (“we” or “us”) is the contract purchaser of the properties located at 1465 Elliott Avenue W. (TPN 7666201740), 1435 Elliott Avenue W. (TPN 76662017500), 1425 Elliott Avenue W. (TPN 7666201755) and 1419 Elliott Avenue W. (TPN 7666201760) (collectively, the “Property”) to provide comments on the Draft EIS for the WSBLE project. The Property is currently home to several buildings housing a wide variety of commercial tenants.

We are concerned that the Draft EIS does not present a thorough or adequate representation of the probable impacts of the WSBLE project, both with respect to the Property and to the corridor as a whole:

- The Draft EIS shows a future light rail transitway located on the Property. But the Draft EIS does not describe how much of the Property will be taken for WSBLE purposes or what the impact will be on the portion of the Property that is remaining.
- Acquisition of the WSBLE project real estate may not occur for several years. During this time, it will be difficult—perhaps impossible—to attract good tenant opportunities or justify capital reinvestment in the Property. The Property will be perceived by the market as being subject to condemnation, even though no action will have been filed. As a result, prospective tenants will avoid leasing opportunities at the Property; and existing tenants will seek alternative corridors to locate their businesses upon lease expiration. This “pre-condemnation blight” condition will impact the usability and value of the Property. When scaled across the entire WSBLE corridor, it will have significant adverse effects on the



occupancy of many buildings. This will result in a loss of jobs and residents along the corridor and will promote urban blight. None of this is studied in the Draft EIS.

- The Draft EIS does not disclose the method, scope or duration of construction on and around the Property and in the Smith Cove area. Because of this lack of information, it is impossible to characterize the likely impacts of the WSBLE project on many issues relating to the Property, including:
 - Transportation and transit service;
 - Noise;
 - Congestion;
 - Potential increases in crime;
 - Loss of sales and rental value and corresponding decreases in property value.

All of these issues should be discussed in detail in the Draft EIS, but only when the Draft EIS adequately describes the WSBLE project.

- The locations, durations and extents of street closures in the vicinity of the Property – all of which will have major impacts on the Property – remain speculative in the Draft EIS. Much more work must be done to define these closures and to provide a menu of effective mitigation for them.
- WSBLE construction, particularly where it is above-grade as in this case, will carve large swaths out of the urban environment in Seattle. Sites like the Property will be rendered unusable as redevelopment opportunities, even though they will be immediately proximate to a future WSBLE station. Thus, the taking of the Property for WSBLE use will reduce the transit-oriented development options in the vicinity of the Smith Cove station. But the Draft EIS completely ignores the impact of WSBLE on future development and makes no effort to assess how corridor and station selection will impact the availability of TOD opportunities in the station area. We believe the alternate corridor location, on the east side of Elliott Avenue, will better preserve future TOD opportunities in the area. This issue must be evaluated in the Draft EIS.
- Sound Transit should prepare a supplement to the Draft EIS that fully describes the WSBLE project and evaluates all impacts associated with the proposal.



In sum, we are concerned that the WSBLE project will have a devastating impact on the use and valuation of the Property specifically, and of the Smith Cove station area generally. The Draft EIS must disclose all such impacts for public review.

We appreciate the opportunity to provide these comments.

Sincerely,

Elliott Ave 1 LLC

DocuSigned by:

By: _____

Gwendolyn Moy

685EDC91A6BA476...

Name: Gwendolyn Moy

Title: Authorised Signatory

April 28, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104
Email: WSBLEDEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of Elliott Way Partners LLC, which is the owner of the property located at 1405 Elliott Avenue West in Seattle, Washington (TPN 7666201770 and the “Property”) to provide comments on the Draft EIS for the South Transit West Seattle and Ballard Link Extension (“WSBLE”) project (“DEIS”). The Property is currently vacant after Elliott Way Partners demolished the existing structure as part of an environmental clean-up effort led by Puget Sound Energy. We are actively planning for development of the Property with a roughly 50,000 sf. office and research & development project (the “Project”). Now that demolition and environmental remediation is complete, we anticipate starting the City of Seattle (“City”) land use review in the near future.

The Property is in the South Interbay Segment of the WSBLE project. The Galer Street Station alternative (“SIB-1”) in the DEIS would have the effect of preventing our Project and eliminating the opportunity for transit-oriented development opportunities along Elliott Avenue.

Our additional comments on the Draft EIS are as follows:

1. The DEIS does not adequately describe the impacts, both temporary and permanent, to the South Interbay neighborhood. This is in part due to the fact that the DEIS is based on inadequate construction plans which are at less than 5% completion, meaning that many key elements are not yet defined, such as:
 - Actual construction methodology for tunnels, such that noise and vibration impacts cannot be estimated;
 - Scope of above-grade construction limits;
 - Actual street closure locations and durations;
 - Scope and design of above-grade improvements with stations; and
 - Duration and sequence of construction activities in order to determine the cumulative impacts to the urban environment, particularly along the 15th Avenue.

Due to the lack of adequate description of these impacts, the DEIS fails to characterize these impacts or identify and evaluate appropriate mitigation measures, particularly for the SIB-1 alignment.

2. All alternatives will include multiple street closures in the vicinity of our Project. We are concerned that these closures are at best only guesses since actual construction methodology has not been identified or studied. The uncertainty associated with these closures and their inevitable impact have not been thoroughly evaluated in the DEIS. More specific mitigation measures for congestion impacts must be developed for all sections of the WSBLE, including the South Interbay alignment options.
3. The DEIS does not adequately describe the affected environment and land use of the WSBLE alignment options in South Interbay, including this Project, which is reasonably foreseeable in the development pipeline. Accordingly, the DEIS fails to provide an accurate baseline assessment of the land use, potential construction, and aesthetic impacts of the SIB-1 alignment. Sound Transit must update the baseline to produce an accurate assessment of likely impacts and potential mitigation measures.
4. The DEIS does not evaluate or anticipate the City's ongoing Industrial and Maritime Lands planning work, which is currently under review with the City with an anticipated adoption in 2023 of new land use and zoning regulations that support innovative industrial uses and increased heights and densities in Interbay, including the South Interbay station area. Sound Transit must study and account for these reasonably foreseeable increases in density – including at the Property – in its analysis. The potential increase in job density at the Property under the Industrial and Maritime Lands effort should be evaluated against the SIB-1 alignment and factored into the economic and land use analysis of the potential for lost transit-oriented development jobs on-site.
5. On April 19, 2022, Sound Transit briefed the City's Transportation Committee regarding potential "refinement" concepts for the WSBLE alignment, including but not limited to consolidation of the Smith Cove and Interbay stations. The DEIS fails to adequately disclose and analyze these potential "refinement" alternatives or identify mitigation. Should Sound Transit elect to proceed with these "refinements" for South Interbay, Sound Transit must undergo supplemental environment review and provide additional comment opportunities for stakeholders to evaluate and respond to an informed analysis.

Elliott Way Partners supports the WSBLE project and believe it will be a significant benefit to City – particularly in Interbay – and the region if properly planned, designed, and implemented.

The DEIS does not provide an adequate disclosure and analysis of the impacts and effective mitigation associated with the WSBLE project. Sound Transit should prepare a supplement to the DEIS that fully describes the WSBLE project - including any potential "refinements" to the South Interbay corridor alignment options – and evaluates all impacts associated with the project.

We appreciate the opportunity to provide these comments.

Sincerely,



April 27, 2022

VIA ELECTRONIC MAIL

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

Re: West Seattle and Ballard Link Extensions
Draft Environmental Impact Statement

Dear Ms. Swift:

We represent Essex Queen Anne, LLC (“Essex”), the owner of the property at 118 Republican Street (“Property”), on the corner of Republican Street and Warren Avenue N. This letter provides Essex’s comments on the West Seattle Ballard Link Extension Draft Environmental Impact Statement (“DEIS”).

The Property contains the Expo Apartments, which provides 275 apartments with 30,000 square feet of ground floor retail and restaurant uses immediately adjacent to the Seattle Center’s Northwest Rooms and August Wilson Way. The Expo Apartments’ garage is accessed from Warren Avenue N. Due to the location of the preferred alternative’s Seattle Center Station and the route alignment immediately adjacent to the Property in the Republican Street right of way, the Property will suffer significant adverse short- and long-term impacts if the preferred alternative is selected. These include, but are not limited to, adverse noise, vibration, dust, light and glare, geotechnical, transportation and parking impacts. Essex anticipates that its residential tenants will suffer significant disruption to the enjoyment of their homes during the lengthy construction period, and many or all of the units will be rendered unlivable, resulting in substantial vacancy. Its commercial tenants will also be impacted, as access by deliveries and customers will be impeded and the customer experience degraded, resulting in business closures. In the long term, there will be significant adverse access and transportation impacts to residential and commercial uses on the Property.

These impacts are not fully analyzed or disclosed in the DEIS. As such, the DEIS fails to provide information sufficient for decision makers to make an informed decision on the preferred station locations and route alignment. Essex requests that Sound Transit refrain from making any decisions regarding the preferred alternative until an adequate environmental analysis has been performed. Key deficiencies in the DEIS are discussed below.

1. Inadequate Range of Alternatives

SEPA requires that the DEIS include a reasonable range of alternatives. Here, the DEIS provides only two alternatives for the Seattle Center Station, which are close in proximity to each other (about a block away from each other). DEIS, Figure 2-49. These are hardly “alternatives” in that their locations and corresponding impacts are very similar. These two stations constitute an inadequate

range of alternatives, particularly in light of the similar significant adverse impacts of the alternative locations considered and corresponding route alignments.

2. Inadequate Information on Which to Base Analysis

The DEIS does not adequately describe the impacts, both temporary and permanent, to our Property or the neighborhood in which it is located, including existing and future land uses. This is due to the fact that the DEIS is based on an inadequate set of construction plans, which makes it impossible to characterize future impacts. We understand that Sound Transit has developed, and is continuing to develop, more specific construction plans and guidelines. This work would help to characterize SEPA impacts, but this information has not been included in the DEIS. The plans on which the DEIS is based are at less than 5% completion, a level that would typically be considered preliminary, which means that most key elements of the project are not yet defined. Accordingly, there is:

- No depiction of horizontal and vertical control for each alignment alternative;
- No information about actual construction methodology, in order to determine noise, vibration, and earth movement impacts;
- No final information on scope of above-grade construction limits;
- No knowledge of complete street closure locations and durations;
- No certainty about designation all or portions of right of way for pedestrian use;
- No real understanding of the location and duration of construction staging; and
- No full information on the duration and sequencing of construction activities, in order to determine the cumulative impacts of construction work on the urban environment.

Without this information, the EIS cannot fully characterize the impacts of the project or develop adequate mitigation. Additional environmental review adequately addressing the impacts of the project in these areas is needed when plans are more fully developed.

3. Failure to Identify Requirement for Future Phased Review

The EIS should be conducted as part of a phased review process under SEPA. Due to the infancy of the project plans, the desire to defer actual construction decisions to some future contractor and the lack of information about most impacts, it is appropriate to phase this SEPA review so that review of actual on-the-ground impacts can occur in the future at a time when there is adequate information to support that review. The current DEIS is not a project action EIS, since the actual project is hardly defined at all; it is more in the nature of an early programmatic EIS, which anticipates the need for additional future SEPA review. While it may be appropriate to make large-scale decisions about corridor alignment through this EIS process, future decisions about construction methodology, street closures, final station entrance locations and their design, and final route alignments and their design should require future SEPA review when facts and information are available to allow that review to occur adequately.

4. Inadequate Analysis of Construction Impacts

The Property will be particularly affected by construction due to the residential nature of the Expo Apartments and the location of the Property immediately adjacent to a route alignment. Construction will occur in the right of way immediately adjacent to the Property boundary and within feet or even inches of buildings and other improvements on the Property. The DEIS fails to adequately analyze the noise, vibration, light and glare and dust impacts from the project. The DEIS also fails to adequately discuss impacts relating to earth movement during construction, which is a concern for the Property due to its location immediately adjacent to the route alignment in Republican Street. *See e.g.*, DEIS, pp. 4.3.7-17, 4.3.7-18 (acknowledging that construction noise could impact residential uses but not quantifying impacts to any specific residential property; acknowledging vibration could occur but not analyzing impacts for any specific residential property). Compounding this lack of analysis, the DEIS fails to identify mitigation to reduce the severity of construction impacts. Many impacts, including important noise, vibration and earth movement impacts, will vary based on method of construction. The DEIS should include performance standards and specific measures to meet them to ensure that the construction impacts of the project are fully mitigated. These may include, but are not limited to, limitations on hours of construction to limit noise that may impact sensitive residential uses, sound barriers to achieve desired sound level limits, limits on the use of certain equipment and construction methods to reduce vibration, shoring methodology to limit earth movement, and before, during and after-construction surveys of vibration and earth movement impacts to adjacent properties, to name only a few. The DEIS fails to do so. *See e.g.*, DEIS, p. 4.3.7-18 (deferring identification of mitigation for vibration to a later Vibration Control Plan, but not providing performance standards); DEIS, p. 4.3.11-8-4.3.11-9 (acknowledging possibility of settlement but stating no mitigation measures other than “standard construction practices” are necessary.)

5. Inadequate Analysis of Transportation and Parking Impacts

Full information on the timing, duration and location of possible street closures associated with the project is not provided. The anticipated 5-year closure of Republican Street in front of the Property during construction of the preferred alternative (DEIS 3-137) will result in significant adverse impacts to the Property, which could be exacerbated by other as yet unspecified closures. While a street closure at a regional scale may not be a significant issue, at a parcel and neighborhood level, a street closure of long duration may have significant adverse impacts. Loss of access to building parking garages and loading facilities could force the shut-down of buildings. Further, in the long term, impediments to resident, customer and loading access will result in significant adverse impacts. In particular, for Expo, customer parking and loading access is crucial to the survival ground-level retail and restaurant uses, both in the short- and long-term. Maintaining continuous and convenient access to residential parking is also essential. Access to ground level retail and restaurants is from Republican Street and Warren Avenue N. Expo’s garage, which provides 329 parking spaces and serves both residential and retail uses, is accessed from Warren Avenue N. The DEIS fails to adequately address impacts to this access due to street closures during construction. The DEIS also fails to address long-term impacts, which are sure to result from the transformation of Republican Street, Warren Avenue N, or both streets, into pedestrian focused realms. This will impede access to Expo’s garage. In addition, it appears the designated street loading area on Republican on which Expo’s businesses rely heavily will be permanently eliminated. The DEIS fails to adequately address these impacts or to identify sufficient mitigation. To the contrary, it includes only weak statements such “as property

access to residences and businesses would be maintained *to the extent possible*,” and “Sound Transit would work with owners . . . where ingress or egress could be blocked during construction,” leaving open the possibility that residences and businesses would have their access cut off. DEIS p. 3-152 (emphasis added).

6. Inadequate Analysis of Land Use Impacts

The Seattle Center vicinity is a vibrant urban area to which the residential uses, retail and restaurant uses, and arts and community organizations housed at Seattle Center all contribute. The DEIS fails to adequately analyze or disclose the significant adverse short- and long-term impacts that the project will have on current and potential future uses, including the residential and commercial uses in Expo, due to the lengthy and disruptive construction period as well as long-term reduction of vehicular and delivery access. See DEIS pp. 4.3.1-5, 4.3.1-6, 4.3.1-8 (no recognition of these displacement impacts). Expo has 9 retail and restaurant tenants, which make up a substantial percentage of the nearby area’s retail/restaurant uses. The project impacts are likely to cause Expo’s retail/restaurant tenants and other affected neighborhood businesses to close permanently. The loss of these businesses will in turn lead to blight of the kind seen in many areas as a result of pandemic-caused business closure. These impacts threaten achievement of the City’s land use goals for this area, an impact not recognized by the DEIS. See DEIS pp. 4.3.2-11, 4.3.2-14 (stating there are no significant adverse land use impacts or mitigation needed). The DEIS also fails to identify adequate mitigation to reduce these impacts.

7. Conclusion

The DEIS fails to identify an adequate range of alternatives and to adequately disclose the impacts of the project in the Seattle Center vicinity or to identify adequate mitigation. While Expo has particular and unique impacts due to the Property’s location and its development with sensitive residential uses, Essex shares many of the concerns voiced by other stakeholders located nearby, including the Seattle Center Foundation, KEXP, Seattle Repertory Theatre, The Vera Project, Cornish College of the Arts, Classical KING FM 98.1, MoPOP, Seattle Children’s Theater, PNW Ballet, Seattle Opera, and Uptown Alliance. Essex incorporates by reference the comments submitted by or on behalf of these stakeholders, particularly those relating to the need for additional station location and route alignment alternatives and additional study of impacts, including but not limited to construction, transportation, parking and land use impacts, and identification of mitigation for those impacts.

Thank you for your consideration of these comments.

Sincerely,



Courtney A. Kaylor

cc: Client



Christine DiJulio, RPA
Associate Director

CBRE, Inc.
Property Management

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Seattle, WA 98104

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Christine.DiJulio@cbre.com
www.cbre.com

April 20, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104
Sent via PDF Email: WSBLEDEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of Fifth & Pine LLC, which is the owner of the properties located at 1513 5th Avenue (TPN 1975700180 and 1975700200) (the "Property") to provide comments on the Draft EIS for the WSBLE project. The Property is currently the home to the Downtown All Saint's store, Sephora, Anthropologie and numerous office tenants.

We are concerned that the Draft EIS does not present a thorough or adequate representation of the probable impacts of the WSBLE project, both with respect to the Property and to the Downtown as a whole. Our comments are as follows:

- The Draft EIS shows a future light rail station entrance located on the northern parcel of the two comprising the Property. But the Draft EIS does not describe how much of the Property will be taken for WSBLE purposes or what the impact will be on the portion of the Property that is remaining.
- Likewise, the Draft EIS indicates that the entire Property may be within the construction limit for this station entrance, but provides no indication of the impact to the southern parcel, even though it is not proposed to be part of the station entrance.
- In the time between now and some future date when real estate acquisition occurs – some years into the future – it will be difficult to make investment and leasing commitments for the Property. If the Property is perceived by the market as having only a limited lifespan, then prospective tenants will shun all leasing opportunities. Magnified across the Downtown, this "pre-condemnation blight" is real and will have deadly effects to the occupancy of many buildings Downtown. This loss of jobs and daytime population Downtown will lead loss of tax revenues for the City and urban blight in general. None of this is studied in the Draft EIS.
- The same applies to the street-level retail spaces in the Property, which will ultimately be lost when the WSBLE construction begins. Again, magnified across the Downtown, this pervasive loss of retail businesses and restaurants at the street level will deprive the Downtown of its urban vitality, further contributing to blight. This must be reviewed in the Draft EIS.

- The Draft EIS does not disclose the method, scope or duration of construction on and around the Property and throughout Downtown. Because of this lack of information, it is impossible to characterize the likely impacts of the WSBLE project on many issues relating to the Property and Downtown, including:
 - Transportation and transit service;
 - Noise;
 - Congestion;
 - Potential increases in crime;
 - Loss of sales and rental value and corresponding decreases in property value.

All of these issues should be discussed in detail in the Draft EIS, but only when the Draft EIS adequately describes the WSBLE project.

- Sound Transit should prepare a supplement to the Draft EIS that fully describes the WSBLE project and evaluates all impacts associated with the proposal.

In sum, we are concerned that the WSBLE project will have a devastating impact on the use and valuation of the Property specifically, and of portions of Downtown generally. The Draft EIS must disclose all such impacts for public review.

We appreciate the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink that reads "Christine DiJulio". The signature is written in a cursive, flowing style.

Christine DiJulio
Associate Director

Sound Transit Projects

Details	Communication
#504468	Dear Ms. Swift:
Date Recieved: 4/28/2022	On behalf of Fortuna Sequitur LLC, which owns the property located at 233 Westlake Avenue North (TPN 1986200065 and the "Property"), we appreciate the opportunity to provide comments on the Sound Transit draft Environmental Impact Statement ("DEIS") for the WSBLE project. The Property is located zoned for dense housing, among other permitted uses. We are evaluating development of the Property for a multifamily housing project ("Project").
Created by: Cecelia Gunn	We write in support of the Downtown Seattle Association's ("DSA'S") comments on the DEIS, which are incorporated to our comment by reference. On behalf of Fortuna Sequitur, we strongly prefer the 5th Avenue/Harrison Street alignment through Downtown (DT-1) for the WSBLE project. In addition to the DSA comments on the DEIS, we provide the following comments specific to the Property.
Audience: General Public	
Reach:	All alternatives for Downtown alignments will include multiple street closures in the vicinity of the Property. We are concerned that these closures are at best only guesses since actual construction methodology has not been identified in the DEIS. The uncertainty associated with these closures and their inevitable impact have not been thoroughly evaluated in the DEIS. Sound Transit must provide an adequate discussion of the construction traffic impacts and more specific mitigation measures for these impacts must be developed.
Participation:	
Engagement:	
Source: Email	All alternatives for Downtown alignments will include tunnelling within the vicinity of the Property. The DEIS fails to include an adequate discussion of the construction impacts, including noise and vibration, that may adversely impact the Property. Sound Transit must provide an adequate discussion of the construction related impacts – including but not limited to noise and vibration – and more specific mitigation measures for these impacts must be developed.
Assigned division: Outreach	The construction impacts under the 6th Avenue/Mercer Street alignment (DT-2) will likely impact the developability of the Project, adding time and cost to the development. The EIS must evaluate and address these impacts and propose mitigation measures.
Category:	
Project Phase: Planning	We support the WSBLE project and believe it will be a significant benefit to Downtown Seattle and the region if properly executed. We encourage Sound Transit to select the DT-1 alignment after a meaningful discussion of the potential impacts and mitigation measures.
Project Segment:	Thank you for the opportunity to provide these comments.
Environmental phase: Draft EIS	Craig Swanson Redside Partners, LLC

**4th and Columbia, LLC
2200 Biscayne Blvd
Miami, FL 33137**

WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104
Email: WSBLEDEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

4th and Columbia, LLC is the owner of the properties located at 701 4th Avenue (TPN 0942000615 and TPN 0942000595) (the “Property”). This letter is to provide comments on the Draft EIS for the WSBLE project. The Property is developed with two parking structures. However, we have a permit application pending with the City of Seattle for the future development of a 1000-foot tall project with 1000 apartment units, office space and a hotel on the Property (the “Project”).

It is difficult to decipher from reading the Draft EIS what the impacts to the Property might be. Buried deep in Appendix J is a plan that appears to suggest that the entire half-block will be used as a construction site, with a 60-foot tall vent structure built on the southern parcel next to the Arctic Building. Other information hidden in the Draft EIS suggests that Sound Transit intends to demolish the garage on the north parcel.

We are curious why a document so critical to the public review and understanding of the WSBLE project goes to such lengths to avoid transparency. Individual property owners should be able to use an interactive map to identify potential future WSBLE uses and impacts on their properties.

Worse, it seems clear to us that Sound Transit does not have a clear enough plan to allow it to describe the impacts of WSBLE nor present a genuine plan for mitigation of these impacts. Our understanding is that these are necessary components of an EIS, and their absence in the Draft EIS suggests that its publication was premature.

Our Project proposes new housing for thousands of residents literally across the street from an existing Sound Transit station on 3rd Avenue. Yet it appears that the Project will be a casualty of the WSBLE project. And similar losses will occur across Downtown. We do not understand how it is possible to justify a transit project that results in the loss of development for thousands of residents and jobs in the very corridor the transit is intended to serve. Yet there is no discussion in the Draft EIS of these significant impacts.

The Draft EIS also needs to evaluate the indirect impacts on the loss of new affordable housing units in Seattle resulting from the WSBLE project. Our Project will likely contribute \$15 million or more in MHA fees to the development of new affordable housing in Seattle. Loss of the Project as a result of WSBLE would deprive the City of these funds. Magnified across the entire corridor,

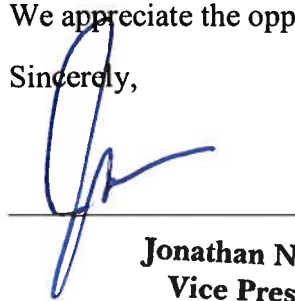
this loss of affordable housing funding will be considerable. The Draft EIS should evaluate these impacts and suggest mitigation – such as replacement funding for affordable housing – to address these impacts.

Finally, even in the event we are allowed to proceed with our Project, the numerous long-duration street closures resulting from the WSBLE project will make it difficult, if not impossible, to construct our Project. The Draft EIS does not seriously evaluate the extensive effect of these street closures on the vitality and future development of Downtown.

For these reasons, Sound Transit should prepare a supplement to the Draft EIS that fully describes the WSBLE project and evaluates all impacts associated with the proposal.

We appreciate the opportunity to provide these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jonathan Newberg', is written over a horizontal line.

Jonathan Newberg
Vice President

April 28, 2022
Sent via electronic mail

WSBLE Draft Environmental Impact Statement (EIS) Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, Washington 98104
E-Mail: WSBLEDEIScomments@soundtransit.org

Hines

Re: Comments on WSBLE Draft EIS from Fourth & Madison

Dear Ms. Swift:

On behalf of T-C 4th & Madison LLC, the owner of the property located at 925 Fourth Avenue (TPN 0942000345) (the “Property”), I am writing to provide comments on the Draft EIS for the WSBLE project. The Property is the site of Fourth & Madison.

Since its development 20 years ago, Fourth & Madison has been one of the preeminent office towers in Downtown Seattle. The project has enjoyed high occupancy rates and has benefited from nearby connections to the Third Avenue Sound Transit tunnel. We support the WSBLE project and the opportunity to expand light rail accessibility throughout Downtown.

There are, of course, impacts associated with developing a light rail project of this scope through the middle of the Center City of Seattle. Among these impacts will be possible street closures on Fourth Avenue and other streets in the proximity of Fourth & Madison. One of the key factors benefiting office occupancy in this portion of Downtown is ease of accessibility to I-5 and destinations north, south and east. The street closures associated with the WSBLE project may significantly impact this accessibility.

While the Draft EIS makes reference to possible street closures, it does not evaluate the impact of such closures or propose mitigation for nearby properties. And it appears to us that the list of possible street closures in the Draft EIS is, at best, an educated guess – with actual closures to be determined in the future.

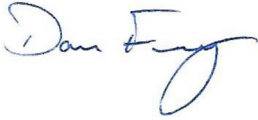
The purpose of the EIS process is to provide a worst-case evaluation of potential impacts from the WSBLE proposal and to outline mitigation to address these impacts. We are concerned that the Draft EIS has not served this purpose. The EIS should include a more careful review of the proposed street closures and

Fourth & Madison
925 Fourth Avenue, Suite 400
Seattle, Washington 98104
(206) 262-4100

propose mitigation to ensure the maintenance of access throughout this area of Downtown during construction of the WSBL project.

We appreciate the opportunity to provide these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Feeney". The signature is fluid and cursive, with the first name "Dan" and last name "Feeney" clearly distinguishable.

Dan Feeney
General Property Manager
Fourth & Madison

CBRE, Inc.
605 Fifth Avenue South
Seattle, WA 98104

+1 206 832 6787 Tel

tina.orecchio@cbre.com
www.cbre.com

Tina Orecchio
Senior Real Estate Manager

CBRE, Inc.
Property Management

April 27, 2022

WSBLE Draft Environmental Impact statement comments
c/o Laurent Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104
WSLBEDEIScomments@soundtransit.org

RE: DEIS Comments from Gateway King LLC (Property Owner)
Parcel Nos. 880970-0030-05/880970-0040-03 located at 605/625 Fifth Avenue South, Seattle

To whom it may concern:

On behalf of the above referenced properties located at Seattle Union Station (605/625 Fifth Ave S), which will be significantly impacted by Sound Transit's West Seattle/Ballard Link Extension project, please see below comments to the Draft Environmental Impact Statement:

- Any alternative selected must maintain existing access points to our buildings (605 & 625 Union Station), which includes pedestrian access (4th Ave S & 5th Ave S) and vehicle access (4th Ave S).
- Any alternative selected must retain existing on and off-street parking, as accessible and available parking is essential to our tenants and the operation of our buildings (605 & 625 Union Station).
- Any alternative selected must maintain full operating capacity of major transportation corridors, including 4th Avenue South and 5th Avenue South and traffic impacts during construction must be studied in detail for each alternative and sufficient mitigation provided to offset the impacts.
- Any alternative selected must maintain full capacity of existing nearby transit as the CID neighborhood is a major transit hub for the City and region, and transit disruptions during construction will not only cause gridlock in the neighborhood, but for connections throughout the City.
- We request additional study be performed on traffic and transit detours, their adequacy, and the resulting level of service (LOS) levels on neighborhood streets.
- The DEIS does not contain sufficient information on impacts to our buildings (605 & 625 Union Station), resulting from nearby construction, including noise, vibration, traffic, air quality and debris, etc. and the Final EIS needs to include this information.
- Regardless of the alternative selected, we request that Sound Transit study alternatives that limit the construction period and footprint of impact to our buildings (605 & 625 Union Station.)

We appreciate the opportunity to comment on these concerns.

Sincerely,
CBRE, Inc., as Agent for Gateway King LLC

Tina Orecchio

Tina Orecchio, Sr. Real Estate Manager

cc: Michael Benoit, Gateway King LLC c/o DWS, Asset Manager

GPG&C Investment Group LLC

945 Elliott Avenue W

Seattle, WA 98119

February 25, 2022

WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift

Sound Transit

401 S. Jackson St.

Seattle, WA 98104

via email to WSBLEDEIScomments@soundtransit.org

Re: Comments on the WSBLE Draft Environmental Impact Statement

Dear Ms. Swift,

This comment letter is submitted in response to the West Seattle and Ballard Link Extension (the “**WSBLE**”) Draft Environmental Impact Statement (the “**DEIS**”).

I have practiced orthodontics in Interbay for eleven years. My wife and I own our clinic location at 945 Elliott Avenue W, and we just purchased two parcels to the south, at 921 and 901 Elliott Avenue West (all together, the “**Property**”). The total area of the property is just over 95,000 square feet. In addition to our orthodontic practice, the Property is occupied by a number of local small arts, brewing and other enterprises in various spaces we have renovated. We’re very excited about light rail coming to our neighborhood, and we think that the WSBLE combined with the City of Seattle’s industrial lands upzone, will help tip Interbay from a self-storage destination to a centrally located economic hub in the City. We aspire to redevelop the Property to provide more density for jobs near Sound Transit’s planned Smith Cove Station.

Based on our location, our primary attention has been to the contemplated South Interbay-Ballard (“**SIB**”) segment. In order to help Sound Transit successfully deliver the WSBLE, we have a number of comments regarding: (1) the general geography of the SIB segment; (2) construction impacts; (2) operational impacts; and (3) mitigation we hope can be addressed in the Final Environmental Impact Statement (the “**FEIS**”).

1. Unique Geography Causes Unique Problems.

Significant geographical features differentiate Interbay from many other neighborhoods in which Sound Transit is accustomed to working. Our corridor is sandwiched between operating railroads and the steep grades of Kinnear Park, which leaves many of us no connection to the street grid -- by any mode -- if and when 15th Avenue West or Elliott Avenue West are obstructed, re-routed, or simply congested during rush hour. For this reason, partial closures of Elliott Avenue West and 15th Avenue West to the north will have disproportionate impacts on many small businesses in those corridors, which have *no access to the road system other than Elliott Avenue West or 15th Avenue West*. Small businesses that will experience these challenges extend all along this corridor: from Sound View Window & Door up near

Fire Station 20 to Corner Deli Teriyaki down by Myrtle Edwards Park. On our property, both our orthodontic practice and our tenants' businesses would be challenged by any of the three alternatives under consideration (SIB-1, SIB-2, and SIB-3) which would all cause partial closures to Elliott Avenue West from West Republican Street to West Galer Street. (DEIS Table 3-31, pg. 31-142). While extremely challenging to small businesses, these closures will also be problematic for office building and denser employment centers, like the building that could occupy our Property in the future.

According to Sound Transit's data, and certainly our own anecdotal experience, this corridor is already choked by a Level of Service (LOS) of E to F, and Sound Transit anticipates that it would remain so during construction and operation alike - or even under the no-action alternative. See, for example, DEIS Transportation Technical Report ("DEIS N.1") Tables 4-40, 4-47 and 4-48, pp. 4-88 and 4-111 *et seq.*

Accordingly, we hope that Sound Transit's environmental review (and decision-making processes) will observe and account for the fact that the Elliott Avenue West traffic gauntlet is already not only bottleneck for through-traffic, but also a sole access point for many area businesses.

2. The FEIS Should Include Deeper Analysis of Construction Impacts.

a. Construction Impacts to Streets, Transit and Freight.

Construction-period impacts to street services are discussed in DEIS Section 3.19.5.1, which points out that under both SIB-1 and SIB-2 partial closures to Elliott Avenue West would increase congestion on Elliott Avenue West. (Presumably SIB-3 would also impact street service on Elliott Avenue West, but the scope and comparative differences are not discussed.). DEIS pp. 3-141 through 3-142.

However, these statements that partial closures would increase congestion do not yet provide information about the local environment or about impacts of the WSBL. The Transportation Technical Report is similarly vague, noting that for SIB-1 "up to four travel lanes" could need to be closed, including a center two-way turn lane. Similarly sparse information is provided about the closure related to SIB-2 in our area. DEIS N.1 pp. 4-138 and 9-1 to 9-2. We hope that the FEIS will explain how these different proposed closures will affect business access for our parcels and our neighbors, and that it will will elaborate on what mitigation is planned.

The DEIS's Section 3.19.5.2, concerning impacts to transit merely refers back to Table 3-31's very general references to "partial closure," and acknowledges that partial closures would "affect service and performance for multiple bus routes." DEIS pp. 3-142. These bus routes are enumerated at Transportation Technical Report pp. 3-59 and 3-60, but no further qualitative or quantitative information is provided. We hope this will be rectified in the FEIS.

In addition to being sparse in detail, these statements may also be incomplete. In this area, road closures would not just increase congestion. Presumably, they would entirely halt any public or owner access to at least some businesses along Elliott Avenue. *The FEIS should confirm whether during these closures, businesses will entirely lose access to public transit and the public street system.* If so, the FEIS should also clarify which businesses will be affected; when access will be lost, and for what duration; and what specific advance notice owners and operators can expect.

Sections 3.19.7.1 and 3.19.7.2 of the DEIS discuss mitigation for construction impacts to transit and to the street grid. DEIS pp. 3-150 through 3-152. However, in the DEIS this section only discusses *future* coordination of *future* mitigation, reciting the names of the other agencies with which Sound

Transit would coordinate, and the general types of measures that are used for roadway impact mitigation. In the FEIS, these sections should clarify what would occur in instances where a property's sole access to transit or streets would be closed for nine months or for eighteen months. Specifically, we are unsure how Sound Transit will be able to provide temporary facilities to maintain service and access where the sole road access to these parcels is by way of the road that will be closed. Similarly, with respect to freight, we are unsure how it will be possible to "identify detour routes suitable for trucks" given our neighborhood's geography. DEIS pg. 3-154 and DEIS N.1 pg. 9-16. For some small businesses that produce goods, like the distillery and cidery on the Property, alternative routes for materials delivery and product distribution simply don't exist here.

When a single street is our business's lifeline, it provides limited comfort to read about future interagency coordination that will provide some kind of mitigation in the future. Particularly noteworthy is the statement that "applicable mitigation commitments to be built by Sound Transit, which would be finalized as part of the environmental process... include maintaining access to business." DEIS pg. 3-151. This DEIS, and the FEIS, are the environmental process, so we respectfully request that mitigation be discussed now. It is not yet clear what the DEIS's general statements mean for us and our neighbors where our businesses already have limited access options. We look forward to the FEIS elaborating how and for whom roadway access will be maintained during these "partial closures," if at all, and elaborating on how the public and businesses be notified of closures and temporary facilities?

b. Construction Impacts to Pedestrians, Bicyclists and Safety.

The DEIS raises similar questions for walkers, bicyclists, or others generally worried about safety in this congested corridor. We were happy to see that Sound Transit's Transportation Technical Report did acknowledge the difficult status quo in our area, documenting that "[m]any streets in this area have impediments or are not conducive to walking," citing heavy truck movement, lack of curbs, blocked sidewalk and missing sidewalks. DEIS N.1 pg. 6-25; *see also* pp. 6-30 ("cycling can be difficult due to high traffic volumes and speeds [and routes] up Queen Anne Hill to the east are limited and difficult to navigate") and 7-14 (identifying Elliott Avenue West as a high-crash corridor).

In the DEIS itself, Section 3.19.5.4 predicts that partial closure of 15th Avenue West "could affect the adjacent sidewalks and business access and transit lanes, which are used by some bicyclists." DEIS pg. 33-143. We hope the FEIS will clarify whether this would also occur on Elliott Avenue West, and we hope that the FEIS will analyze these impacts in both instances so that decision-makers and the public can understand what will happen: We ask that the FEIS detail which of our sidewalks will be closed and which will be limited, and elaborate on where exactly these pedestrians and bicyclists would go. Even on foot, our neighborhood does not have many re-route options.

At this point, the DEIS does not provide the description or analysis we need, instead relying on broad statements like "Sound Transit would work with the City of Seattle to develop and implement a construction management plan to provide alternate facilities for non-motorized travel." DEIS pg. 3-153. But if a property's sole street frontage is closed, it is unclear how this can be accomplished. We hope that in the FEIS these placeholders will be replaced by detailed analysis of impacts and discussion of mitigation for single-access properties like ours. The DEIS includes a "key finding" that "[c]onstruction would result in closed or modified non-motorized facilities for various durations throughout the project," DEIS pg. 3.3, but it does not yet say what will happen where no alternative routes exist? We hope the FEIS, or its Transportation Technical Report, will provide this information, and will clarify, how business owners and the public will know when and where closures are anticipated. *See, e.g.,* DEIS N.1E-1 ("Roadway closures could also include short-term or long-term closure of sidewalks. Extent and duration of sidewalk closures will be coordinated with the City of Seattle in later phases of project development.").

In this neighborhood, we cannot take for granted that an alternative route will be available. This is why it is critical that FEIS do more to allow Sound Transit's decision makers and the public understand where these impacts will occur, the modification of non-motorized facilities, or the mitigation strategies to address closures. The sparse detail continues in the following row, which covers safety. Where pedestrians are navigating detours and unfamiliar routes amidst ongoing and changing construction patterns, that should be noted as a safety concern.

In short, this information is critical for our business planning, so it cannot be coordinated and disclosed later. We respectfully request that the FEIS disclose and analyze all adverse impacts of the WSBLE and to analyze proposed mitigation strategies.

c. Indirect & Cumulative Construction Impacts.

The DEIS cumulative effects analysis also does not reference the ongoing Industrial and Maritime Strategy work currently in the works at the Seattle Office of Planning and Community Development ("OPCD"). The Industrial Lands work anticipates a complete overhaul of Seattle's industrial land use code regulations. Areas near current and future light rail stations will receive a meaningful increase in development capacity, and a number of industrial areas will be allowed additional density to incentivize further industrial development.¹ OPCD is moving to its own FEIS this summer, and it expects to adopt new regulations in early 2023, approximately three years before the start of the WSBLE construction.

Sites like ours are ripe for redevelopment with the upzone, and it is foreseeable that many projects will be under construction or complete by the time the WSBLE construction starts. It is unlikely that vehicular, transit and pedestrian volumes and patterns will stay the same after an upzone, so the FEIS must consider impacts to properties like ours once upzoned. There will be not only additional vehicle trips and additional pedestrians, but changes in traffic times and directions.

Additionally, the pipeline projects analyzed as part of the cumulative effects analysis were taken from May 2021. It appears to be a comprehensive data set, but this information will be more than a year out of date by the time the FEIS is issued. We ask that the project list be updated for the FEIS analysis, and that the FEIS also acknowledge that future, simultaneous construction is likely. Such impacts are not thoroughly discussed in the DEIS's cumulative effects analysis, which states, "[c]onstruction in or near roadways typically requires lane closures, detours, and traffic delays. Interactions among two or more concurrent construction projects can intensify these impacts. However, most reasonably foreseeable future actions that can be reliably identified at present would be completed or near completion before the WSBLE Project construction would begin." DEIS N.1, Pg. 11-1. Seattle's construction pipeline will not be frozen, and it is reasonably foreseeable based on adopted long-range planning documents that there will be simultaneous construction projects that will require additional lane and sidewalk closures.

Further, for our neighborhood, we respectfully request that the cumulative impacts include some analysis of cross-segment impacts. The best example of this is regarding closures in areas further north on 15th Avenue W. While these closures may not occur within the SIB segment as defined by Sound Transit, they will have impacts on the SIB neighborhood, because 15th Avenue West is Elliott Avenue West's primary access point from North Seattle. This is like turning off a house's water at the street without considering whether there will be any consequences to the kitchen tap. It may still be possible to carry water to the sink by other means, but things will be dramatically different. Where a business corridor has few points of access, we ask that the FEIS analyze the impacts of closing primary access points, even where they are in different segments of the WSBLE.

¹ See <https://www.seattle.gov/opcd/ongoing-initiatives/industrial-and-maritime-strategy>

3. The FEIS Should Include Deeper Analysis of Operational Impacts.

In analyzing permanent arterial and street operations after the WSBLE is complete, the DEIS again leaves important details unclear. For example, DEIS pg. 3-97 and Transportation Technical Report pg. 4-93 state that left-turn access from Elliott Avenue West “to approximately ten properties” would be restricted under SIB-1. We were unable to determine based on the DEIS whether this will include some or all of our properties. We were also unable to determine the extent of the “restriction,” or which properties on Elliott Avenue West would lose left turn access altogether under SIB-2 or SIB-3. It was also unclear whether the analysis would change when our Property is redeveloped with dense office and laboratory uses. Once again, we are unsure how re-routing could work in this location, or whether all access would be lost. We respectfully request that the FEIS analyze and disclose the full extent of such impacts, with sufficient detail that the reader can understand what the results will be.

By way of further example in this Section 3.13, Table 3-24 sets forth the intersections that would be considered for potential mitigation measures depending on the alternative, but the DEIS then closes with an expansive caveat: “Final mitigation would be determined and agreed upon by Sound Transit and the City of Seattle, in coordination with FTA...” DEIS pg. 3-102. We ask that the final mitigation package not be a product of some later inter-governmental negotiation, because the purpose of NEPA and SEPA is to allow for mitigation to be revealed to and understandable by the public, to allow for informed input before the decision is made. The FEIS therefore should also include disclosure and analysis of proposed mitigation.

4. The FEIS Should Analyze Vibration Impacts during Construction and Operation.

We intend to redevelop our Property with a mix of laboratory, research and office uses after the industrial lands upzone is adopted by Seattle City Council. Sound Transit’s DEIS Category 1 land uses as those most sensitive to vibration, including “buildings where vibration-sensitive research and manufacturing equipment is conducted . . . and universities conducting physical research operations.” DEIS pg. 3-8. The laboratory and research spaces that we plan to develop on our property will be such Category 1 sensitive uses, designed to accommodate physical research operations and we ask that they be considered as such in the FEIS analysis.

Vibration impacts were analyzed in the DEIS by collecting and averaging vibration data for West Seattle, Downtown, and Interbay/Ballard. DEIS Noise and Vibration Technical Report (“DEIS N.3”) pg. 4-8. For existing Category 1 buildings, site-specific data was collected and analyzed. *Id.* at pp. 4-10 and 5-11. The FEIS analysis thus should account for our plans to host Category 1 sensitive uses on the Property after the rezone is completed.

Vibration impacts can occur during construction and light rail operation. We respectfully request that the FEIS include analysis of potential vibration impacts at our Property during both periods. Unchecked new vibrations would be a substantial restriction on our site and could preclude the intended future laboratory use. This could be a significant adverse environmental impact.

The closest potentially analogous analysis in the DEIS is for a group of specialized users located at 645 Elliott Avenue West (“iHeart Media Site”), which the DEIS notes is 90 feet from the Alternative SIB-1 line, 91 feet from the Alternative SIB-2 line and 299 feet from the Alternative SIB-3 line. DEIS N.3 pp. 5-12, 6-57 and 6-58. Predicted vibration levels for the iHeart Media Site were found to exceed the vibration limit for sensitive during construction of SIB-1 or SIB-2, *id.* at pg. 6-70, though not during operation, *id.* at pg. 6-57 through 6-58.

This information is useful, but leaves us with lingering questions. Not only is our Property expected to contain similarly sensitive uses, but it is located closer to the guideway route than is the iHeart Media Site under Alternative SIB-3. Further, it is substantially closer to the Smith Cove station and its supporting infrastructure under both SIB-2 and SIB-3. We appreciate Sound Transit's commitment to avoiding hard braking, DEIS N.3 pg. 4-1 at "[o]perator training," and also Sound Transit's tacit acknowledgement that some hard braking will still occur, *id.* at "[w]heel truing and replacement." Unlike the iHeart Media Site, some or all of our Property may be within an "area of vibration or groundborne noise impact." *Id.* pg. 6-56. We hope Sound Transit can understand our concern about vibration impacts on our Property under SIB-1, SIB-2 or SIB-3. We therefore ask that the FEIS adequately disclose these potential vibration impacts -- during both construction and operation -- and identify appropriate mitigation measures.

The DEIS analysis states construction vibration mitigation will consist of a Construction Vibration Control Plan which will include "[s]pecific vibration-control measures where predicted levels exceed the limits." DEIS N.3 pg. 7-31. This plan should be developed as part of the FEIS, and the "specific measures" for vibration controls during construction adjacent to the Property should be identified. With construction expected to last from 2026 to 2039 for the Smith Cove area of the WSBLE, construction impacts should not really be considered temporary. See DEIS Executive Summary, pg. ES-45. Multi-year disruptions to laboratory functions must be analyzed in the FEIS, together with mitigation techniques for construction vibration impacts that are specific to sensitive sites. The FEIS should also provide more information about the anticipated construction durations near laboratory uses, so that part of the vibration mitigation strategy can be reduction in construction durations and frequency near sensitive uses.

Additional mitigation measures should also be identified for long-term operation impacts where appropriate. Specifically, we hope that the continuous-mat floating slab suggested as operational mitigation for vibration impacts on other sites will be studied as a mitigation option for the Property. Finally, we understand that Sound Transit used vibration mitigation measures as part of its most recent expansion, so the FEIS should include an analysis based on Sound Transit's real-world experience.

5. Mitigation Suggestions for Consideration in FEIS.

a. Construction Mitigation

The DEIS discussion of construction mitigation essentially states mitigation will be coordinated with the City of Seattle and King County Metro later. DEIS N.1 pp. 3-65 to 3-66. Hopefully Sound Transit will agree that complete environmental analysis must discuss thoughtful mitigation strategies at the time of the analysis. After the FEIS analysis is updated to disclose vehicular, transit, pedestrian, and vibration impacts during construction, then the mitigation analysis should also be updated with meaningful ways to address these construction impacts.

Based on the information available at this stage, we suggest that the following mitigation measures be considered in the FEIS:

- Robust wayfinding and other non-motorized enhancements through construction areas to allow continued access to neighborhood businesses, with advance attention to single-access businesses.
- Development of shuttle routes that will provide specific, real access to these businesses.
- Wayfinding and other pedestrian enhancements to help users find the new Smith Cove Station, particularly during times of closures on Elliott Avenue West and 15th Avenue West alike. This could

have a double benefit - helping users become acquainted with the Smith Cove Station while providing alternative access points to our neighborhood during the period after the new station is completed but upstream work in Interbay and Ballard continues.

- Whenever a complete closure of Elliott Avenue West or 15th Avenue West is contemplated, even for a short term or intermittent period, provide early notice to single-access businesses (so that manufacturers can plan shipments and orthodontists can reschedule appointments, for example.)
- Provide robust pedestrian and bicyclist safety measures during construction due to the funneling of construction activity, pedestrians, bicyclists, transit, cars, freight and construction activity through the 15th Avenue West and Elliott Avenue West corridors.
- Vibration mitigations during the construction period could include conscientious phasing of construction durations and frequency near sensitive users, especially with respect to the most vibration-prone types of construction equipment.
- Based on FEIS findings, consider continuous mat floating slab or other vibration mitigations for sensitive users, based on site-specific configurations and data.

b. Operational Mitigation

- Long-term wayfinding and safety enhancements should account for the confluence of different users into this narrow corridor.
- Potential improvements could include lighting, landscaping, painting, sidewalk improvements, etc.) between the Smith Cove and Interbay Stations and nearby single-access businesses.
- Wayfinding and other pedestrian enhancements to help users find their way safely between the new Smith Cove Station, other transit modes, and local businesses and amenities.
- Operational plans that include early warning to single-access property owners during system service changes or maintenance projects.
- Based on FEIS findings, consider continuous mat floating slab or other vibration mitigations for sensitive users, based on site-specific configurations and data.

6. Conclusion.

In essence, owners and occupants respectfully request more information about transportation disruptions during construction phase, changes or disruptions that will occur in permanent operations, and exactly what mitigation will occur for each of the above. We look forward to becoming more confident that small businesses will be made whole when their lifelines to customers and employees are disrupted, and we ask to understand both the disruptions and the mitigation in advance, so that our community can plan ahead.

These questions not only concern us due to the consequences on our orthodontic practice and on our current tenants, but also due to the consequences with respect to potential *future* tenants. Some of our tenants may go out of business, and others may leave the neighborhood if disruptions are severe and not sufficiently mitigated. This in turn would disrupt our property ownership and management business, because we may be unable to re-rent these spaces until 15th Avenue West and Elliott Avenue West are both clear once again.

Thank you for your consideration of our concerns. We eagerly look forward to reading a more robust FEIS and look forward to working with Sound Transit to build a better-connected Interbay in the years to come.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'G' followed by a 'V' and a trailing flourish.

Dr. Gregory Vaughn, DDS

Sound Transit Projects

Details	Communication
<div>#503171</div> <div><div>From:</div><div>Andrew Short</div></div> <div><div>Date Recieved:</div><div>4/28/2022</div></div> <div><div>Created by:</div><div></div></div> <div><div>Audience:</div><div></div></div> <div><div>Reach:</div><div></div></div> <div><div>Participation:</div><div></div></div> <div><div>Engagement:</div><div></div></div> <div><div>Source:</div><div>Online open house</div></div> <div><div>Assigned division:</div><div>Outreach</div></div> <div><div>Category:</div><div></div></div> <div><div>Project Phase:</div><div>Planning</div></div> <div><div>Project Segment:</div><div></div></div> <div><div>Environmental phase:</div><div>Draft EIS</div></div>	<div>Hi-</div> <div>I am a co-owner and operator of Greenwood Cider Company, whose production space is located at 1445 Elliott Avenue West. We rent the space from Hayes Elliott Properties, and moved in last spring. The moving process was immensely expensive for us, and we are still in debt for tenant improvements we made to render the space usable as a working cidery. The preferred alternative route would go right through the middle of our building, requiring us to relocate. We are concerned about what to us represents a massive expense in time, labor, and lost income should the preferred alternative be approved. Were we forced to move, we would not be able to legally produce cider at a new location until our permit amendments with the Federal Tax and Trade Bureau and the Washington State Liquor and Cannabis Board received approval, a process that can take as many as six months. We are frightened at the prospect of losing our cidery, and are uncertain about what compensation, if any, would be made available to us.</div>

Sound Transit Projects

Details	Communication
#501797	Dear Sound Transit,
From: Rebecca Castilleja	My father, Arthur Hays, purchased the building at 1465 Elliott Ave. W. in 1962, and since then accumulated surrounding properties as warehouses to accommodate his growing wholesale toy and hobby business. The properties were later repurposed to house a variety of commercial enterprises.
Organization: Hays Elliot Properties LLC	The west side of the north end of Elliott Ave. W. has become a unique and thriving commercial district, home to 20 local independently owned businesses. I ask Sound Transit to reconsider their designation of this valuable business corridor as the "preferred alternative" route for the downtown-Ballard Link rail line and choose an alternate path which will have less negative impact on the surrounding neighborhoods and businesses. An alternative route along the east side of Elliott Ave. W. would provide a scenic vista along the Queen Anne greenbelt and displace far fewer businesses.
Date Recieved: 4/26/2022	The uprooting of these businesses for transit would destroy an asset to the surrounding communities of Queen Anne, Magnolia, Interbay, Ballard, and Belltown. The historic north end of Elliott Ave. W. has become a destination through the variety of its popular retail establishments: Champion Party Supply, Elliott Avenue Wine Storage, Batch-206 Distillery, Holy Mountain Brewing Co., Greenwood Cider, Salle Auriol Fending Club, Bell Occhio Home. This section of Elliott Ave. is also home to a number of other local independently owned businesses specializing in such fields as tech, design, outdoor apparel and gear, and commercial photography.
Created by:	
Audience:	Seattle will be poorer for destroying the unique local commercial centers which create livable cities and discourage suburban sprawl. I urge you to select another route for the Ballard Link which will not destroy a thriving business community and asset to the surrounding neighborhoods.
Reach:	
Participation:	
Engagement:	As landlord and property owner, the impact of the proposed light rail extension has been devastating. As landlord, I have seen how uncertainty surrounding the project has interfered with our tenants' sense of security in their places of business and their ability to plan. As the property owner (60 years), Hays Elliott Properties initiated plans to sell the real estate portfolio in 2019. Shortly thereafter, we were informed that the properties were being considered for taking by Sound Transit for the Ballard light rail. Our plans to sell have been effectively derailed by Sound Transit, as two buyers started the process of purchasing the properties, only to exit once they learned of the potential taking by Sound Transit. A third buyer, after months of working through the sales process, is now reconsidering. For Hays Elliott Properties LLC, Sound Transit has been a NIGHTMARE. We are unable to act on long planned business decisions and our many tenants are justifiably concerned about their ability execute their business plans as well. I strongly urge Sound Transit to choose a Ballard Link route which will not decimate such a large number of thriving businesses, which both support and enhance our communities.
Source: Online open house	
Assigned division: Outreach	
Category:	Thank you.
Project Phase: Planning	Sincerely, Rebecca Castilleja, Manager
Project Segment:	Hays Elliott Properties, LLC
Environmental phase: Draft EIS	

Sound Transit Projects

Details	Communication
#499385	This is in regards to the preferred extension for Interbay-Section 2.1.2.2.4 (South Interbay Segment) and Figure 2-54 (South Interbay Segment Alternatives) of the draft EIS.
From: Colin Lenfesty	I have owned Holy Mountain Brewing Company for the past 7 years. During that time, we have grown and become an important gathering space in the Interbay neighborhood in Seattle. The prospect of this building getting torn down and displacing our staff, after weathering the last two years of pretty much everyones life, feels like we are getting kicked while we are down. WE are a gathering place for people that live in the Queen Anne neighborhood, along with the employees that are returning to Expedia across the train tracks.
Date Recieved: 4/4/2022	I know the details aren't clear about timeline of when the building will be taken down/over from the current landlord if this preferred route is approved, but we are requesting to a continuation of our lease as long as possible for the next few years with whoever the landlord may be.
Created by:	More so, ("Prospect Street Station/Central Interbay (SIB-3) appears to displace far fewer residents and businesses than Sound
Audience:	Transit's preferred alternative. See Figure 4.3.1-4 of draft EIS.
Reach:	We ask to to please strongly consider this alternative to preserve our business, and the other businesses affected by this project. Our brewery, the distillery, and cidery located in the same complex, provided much needed normalcy to folks during COVID, and provide a meeting place for people to congregate, relac and unwind.. The other businesses located within the complex as well, are important to this area and neighborhood.
Participation:	Again, we ask you to please consider the other alternatives to demolishing this block of buildings. There are an unmeasurable amount of time and resources that have been put into making Holy Mountain successful, as well as the other businesses in this neighborhood. This will displace many peoples hard work they put into their businesses, as well as their employees livelihood. Please consider a route that will have less of an impact to these hard working people.
Engagement:	Colin Lenfesty
Source: Online open house	President Holy Mountain Brewing Company
Assigned division: Outreach	425-241-9117
Category:	
Project Phase: Planning	
Project Segment:	
Environmental phase: Draft EIS	

MAILING ADDRESS

PO Box 3007
Seattle, WA 98114-3007

ADMINISTRATION

720 8th Ave S, 2nd Floor
Seattle, WA 98104
206.788.3650

**INTERNATIONAL DISTRICT
MEDICAL & DENTAL CLINIC**

720 8th Ave S
Seattle, WA 98104
206.788.3700

ICHS VISION CLINIC

718 8th Ave S
Seattle, WA 98104
206.788.3505

ICHS LEGACY HOUSE

803 S Lane St
Seattle, WA 98104
206.292.5184

HOLLY PARK

MEDICAL & DENTAL CLINIC
3815 S Othello St
Seattle, WA 98118
206.788.3500

BELLEVUE

MEDICAL & DENTAL CLINIC
1050 140th Ave NE
Bellevue, WA 98005
425.373.3000

SHORELINE

MEDICAL & DENTAL CLINIC
16549 Aurora Ave N
Shoreline, WA 98133
206.533.2600

**SEATTLE WORLD SCHOOL
TEEN HEALTH CENTER**

1700 E Union St
Seattle, WA 98122
206.332.7160

**HIGHLAND MIDDLE SCHOOL
HEALTH CENTER**

11650 SE 60th St
Bellevue, WA 98006
425.373.3135

**ICHS MEAL PROGRAM AT
BUSH ASIA CENTER**

409 Maynard Ave S, Plaza 6
Seattle, WA 98104
206.521.4129

**ICHS PRIMARY CARE CLINIC
AT ACRS**

3639 Martin Luther King Jr Way S
Seattle, WA 98144
206.788.3700

MOBILE DENTAL CLINIC

206.445.8454

April 27, 2022

WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift

Sound Transit

401 S. Jackson St.

Seattle, WA 98104

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

Dear Ms. Swift,

International Community Health Services (“ICHS”) is writing in regards to the Draft Environmental Impact Statement (“DEIS”) for the West Seattle and Ballard Link Extensions Project (“WSBLE” and “the Project,” respectively) issued by Sound Transit on January 28, 2022. ICHS provides these comments on the Project with grave concerns about the potential impacts on Chinatown/International District (CID), and the neighboring Pioneer Square.

ICHS supports expanded public transportation throughout the region, for reasons of both equity and practicality. We generally support the creation of a second Link light rail station in the CID, in addition to the existing Union Station, to allow more direct connections between our neighborhood and the rest of the region. There will be many positive benefits from such increased connectivity.

However, ICHS is concerned that a number of negative or potentially negative impacts from the proposed CID station (hereafter “CID station” or “proposed station”) are not adequately addressed in the DEIS. We appreciate the opportunity to provide comments to raise these concerns and request more information from Sound Transit.

ICHS would like to discuss the following issues:

1. The **inequitable burden from major construction projects** the CID has historically felt, and will again extensively experience in prolonged fashion, is not adequately addressed in the DEIS;
2. The **likelihood of more residential and small business displacements** than are accounted for in the DEIS;
3. The potential effects that **Metro relocations will have** on ICHS on the provision of patient and client services, and access for staff, contractors, vendors, regulators, etc.;
4. The **lack of a visual assessment and noise assessment** of the proposed station to address impacts to CID businesses and residents; and
5. The **ongoing impacts of COVID-19, anti-Asian bias crimes**, and other public health and safety emergencies are not adequately addressed.

About International Community Health Services

Established in 1973, ICHS is a Federally Qualified Health Center (“FQHC”) that provides comprehensive, culturally and linguistically appropriate health and wellness services throughout King County, and is anchored in Seattle’s Chinatown International District (“CID”). As an FQHC deeply rooted in the Asian Pacific Islander community, ICHS offers medical, dental, behavioral health, nutrition, Chinese traditional medicine, senior services, enabling services at four full-service and seven satellite sites, serving patients from across the wider Puget Sound region. We provide these services to everyone, regardless of their insurance status or ability to pay.

ICHS was founded by community activists to provide primary medical care to elderly Chinese and Filipino immigrants who had no access to doctors who spoke their languages. Today, it continues that focus on linguistic and cultural competence. ICHS provides in-person interpretation, both through its own staff and through contracted in-person interpreters. In the event that an in-person interpreter is not available, web-based and telephonic interpretation are available as back-ups. In a typical year, ICHS serves patients speaking approximately 70 different languages.

ICHS patients overwhelmingly belong to medically underserved communities. In 2021, 78 percent of our patients were Black, Indigenous, or People of Color (BIPOC), with 68 percent identifying as Asian American or Pacific Islanders. More than half of our patients (55 percent) preferred to speak a language other than English. Additionally, the majority of our patients are low-income, with 59 percent living at or below 200 percent of the Federal Poverty Level (FPL).

Our flagship clinic is located in the Chinatown International District, at 720 8th Avenue South. Approximately 10,000 unduplicated patients access services at our International District Medical and Dental Clinic (ID Clinic) annually. Historically and currently, more of our patients receive services here than at any other single site. ICHS also has strong connections with other community-based organizations serving the CID.

Moreover, the ICHS operates senior programs in the CID which include assisted living, an adult day health center, a congregate meal program, and a Medicaid/Medicare Program of All-Inclusive Care for the Elderly (PACE) — all programs which provide a continuum of care for seniors age 67-98 as they advance in age and frailty. PACE is targeted for the frailest, seniors who qualify for nursing home care but are able to stay at home or in the community with comprehensive health, socialization, transportation and home care services from ICHS. Lack of access, construction noise, dust, and other attenuate negative impacts will disproportionately affect the frail senior population served at this site.

The CID has historically shouldered inequitable burdens from major construction projects, which are not adequately addressed in the DEIS.

The “DRAFT Racial Equity Toolkit Report: Environmental Review Phase” for the WSBLE project says its purpose is “centering the people most harmed by racialization and vulnerable to systemic racism in project development and project outcomes,” (page 2). The “Environmental

Justice” appendix of the DEIS concludes that the West Seattle Link Extension “would not result in disproportionately high and adverse effects on minority and low-income populations,” (Appendix G, page 7-1). This would indicate that Sound Transit has concluded there are limited negative impacts to marginalized communities as a result of the WSBLE project. Moreover, these comments likely apply to the entire stretch of the West Seattle Link, not the CID which will be disproportionately affected due to its location, density of Asian population, small and medium sized businesses and non-profits like ICHS.

The “Environmental Justice Summary” of the DEIS acknowledges that “the Chinatown-International District has experienced impacts over the past century from numerous projects in Downtown Seattle.” With regards to the cumulative impacts of the Project, the Environmental Justice Summary concludes that “due to the history of past projects, the Chinatown-International District community could feel particularly burdened by these impacts.” Even a cursory review of the long history of racist laws specifically targeting Asian populations and the impacts of major capital projects directly affecting Seattle’s historically Asian neighborhood reveals a critical underestimation of the adverse impacts of this project on the neighborhood.

The following are just a small sample of the racist laws and capital projects which negatively impacted the Asian and Pacific Islander (API) communities in Seattle:

- 1864 Alien Land Laws
- 1882 Chinese Exclusion Act
- 1921 Alien Land Laws
- 1949 Construction of Charles St. Maintenance Facility
- 1960s construction of Interstate 5 (I-5)
- 1970 Ozark Apartment fire
- 1972 Construction of the Kingdome
- 1973 formation of the International Special Review District (ISRD)
- 1987-1990 Construction of Downtown Seattle Transit Tunnel (now home to the current International District/Chinatown light rail station)
- 2012 Livable South Downtown Upzones
- 2012-2016 Streetcar construction and utility construction on S Jackson St., including construction of the 8th Ave. S spur line to access the Charles St Maintenance Facility redevelopment
- 2015 Denny Substation transmission line anticipated construction
- 2015 Housing Affordability and Livability Agenda (HALA)
- 2019 Mandatory Housing Affordability

Addressing the full scope of historic and modern public policies and projects that have harmed businesses and residents of the CID is the only way to show that the DEIS does “not result in disproportionately high and adverse effects” to the predominantly minority and low-income population of the CID.

The DEIS does not adequately account for the full scope of likely impacts to the CID from the 5th Avenue alternatives.

The DEIS compares the impacts of several alternatives for the new CID station along 4th Avenue or 5th Avenue. ICHS is concerned that Sound Transit has not fully accounted for their impacts, especially for the 5th Avenue alternatives. The 5th Avenue alternatives appear likely to cause significantly more disruption to and displacement of CID businesses than the DEIS accounts for.

Notably, the 5th Avenue alternatives would push the new CID station into the core of the neighborhood. The temporary loss of business and health and human services access due to construction along 5th and 6th Avenues and King and Weller Streets would be significant for the economic and social activities of the neighborhood. Alternatives CID-2a (5th Avenue Shallow) and CID-2a diagonal (5th Avenue Diagonal) are both projected to incur higher numbers of employee displacements than either alternative CID-1a (4th Avenue Shallow) or CID-2b (5th Avenue Deep). While alternative CID-2b (5th Avenue Deep) is not projected to have as many employee displacements, it is projected to have the highest number of business displacements – 18 businesses, more than twice the number of either 4th Avenue alternative. Any impacts from the 5th Avenue alternatives would be more devastating to the CID than the DEIS reasonably accounts for due to the interconnectedness of the neighborhood. Sound Transit must conduct additional analysis of these impacts in light of concerns raised during the community feedback and public comment process and provide updates to the community prior to issuing a final EIS.

Temporary Metro relocations have the potential to disrupt ICHS operations and patient services.

Moreover, alternative CID-2a is especially concerning to us. It proposes relocating Metro bus trolleys from 5th Avenue to either 7th Avenue or 8th Avenue (DEIS 4.3.4.4.3). This disruption would likely go on for years. ICHS has already seen what a mass transit relocation down 8th Avenue does for foot traffic, noise pollution, and general area disruption with the 8th Avenue Spur Line of the First Hill Streetcar at the Charles Street maintenance facility. We had significant concerns about business disruption and pedestrian safety when the Spur Line was proposed, and we continued to experience disruptions and concerns throughout the Spur Line's use. Since that time, ICHS's footprint across International Village Squares 1 and 2, on the southwest and southeast corners of 8th Avenue S and S Lane Street respectively, has significantly grown. Using 8th Avenue for Metro trolley buses will cause many of the same concerns.

In addition to the ongoing pick-ups and drop-offs for patients, clients, staff, and visitors to the multiple ICHS sites at International Village Square1, the following are just a few select operations that would be disrupted by rerouting Metro bus trolleys along 8th Avenue S:

- A mammogram coach (a semi-trailer) parks along 8th Avenue S between S Dearborn Street and S Lane Street one day per week, providing cancer screening services to patients and the community
- Food delivery to Legacy House assisted living facility using a semi-truck on S Lane Street off of 8th Avenue S twice per week.
- Food service and meal deliveries to seniors in the community from Legacy House.

- KC Metro ACCESS Vans and ICHS handicap vans for adult day service clients, and ICHS transportation for elderly PACE participants and other patient/client with multiple pick-up/drop-off on 8th Avenue S between S Dearborn Street and S Lane Street.
- Ambulance services multiple times per month, sometimes per week, along the northwest side of International Village Square 1 (both the 8th Avenue S side and the S Lane Street side) serving the clinic and the senior services and housing facility.

ICHS is also concerned about the impacts that Metro trolley bus relocation to 8th Avenue or 7th Avenue would have on anticipated private development projects anticipated to begin in 2023 on the northeast corner of 8th Avenue S and S Lane Street. While Sound Transit itself may not be affected by private development projects, it should be concerned how their construction activities will exacerbate the difficulties being faced by neighboring residents and businesses. Mitigation is addressed only for the 27 businesses and 120 residences identified in the DEIS as targets for displacement from the CID Station alternatives (Appendix G, page 5-30). Virtually no discussion is given to how mitigation strategies might be developed for residents and businesses disrupted or displaced due to secondary impacts from construction. Relocating Metro trolley buses to 8th Avenue, for example, at the same time that ICHS loses significant street space on 8th Avenue S and S Lane Street when a private development begins permitted construction, would have significant negative consequences for our operations, staff, patients, and clients. Sound Transit must provide CID community stakeholders with more detail on mitigation strategies for these “downstream” impacts from the Project.

No surface noise or visual assessments were conducted for the DEIS, so full impacts to the neighborhood’s population cannot be adequately determined.

The DEIS states that “Sound Transit did not perform a noise analysis” for the CID segment of the WSBLE (DEIS 4.3.7.3.2). The agency’s reasoning is that because this part of the Project “would be mostly in tunnels or where there are no FTA noise-sensitive receivers,” such an analysis was not necessary. Further, the DEIS relies on the analysis that “residential use properties within commercial districts are treated the same as commercial properties within the city of Seattle” for the purposes of determining whether to conduct noise analyses for the CID segment.

Using this litmus test not only misrepresents the residential-industrial hybrid nature of the CID, it allows Sound Transit to avoid responsibility for the potential noise impacts to residents living in buildings explicitly named in the DEIS as being “residential use properties within commercial districts” and the mixed use properties with residences in commercial buildings, including Uwajimaya and the Publix Hotel. The DEIS also says the nearest “residential” district to the CID is south of S Dearborn Street to the east of I-5; this discounts the dozens of senior residents living in Legacy House, ICHS’s assisted living facility, located on 8th Avenue S and S Lane Street. All together, there are hundreds of residents living in parts of the CID with the potential to be directly affected by noise from the Project. There are very real health consequences to exposure to constant and significant noise pollution.¹

¹ <https://www.asha.org/public/hearing/loud-noise-dangers/>

ICHS also considers the visual assessment conducted by Sound Transit to be lacking. The DEIS states that “the visual quality of views” in the area of the CID where the new station would be built “range[s] from average to low average,” (Appendix N.2, page 3-10). The area immediately impacted by station construction and visibility includes not only multi-family residential buildings for both 4th and 5th Avenue alternatives, but potentially would include Hing Hay Park for the 5th Avenue alternative. The “Environmental Justice” chapter of the DEIS describes the CID as a hub for the Asian American community in Seattle, and specifically cites Hing Hay Park as a key feature. Temporary features such as massive construction equipment or permanent features such as station vents would certainly affect the aesthetics of the CID and be highly visible from Hing Hay Park and the residential properties surrounding the Project site.

In conclusion, Sound Transit must do an operational noise analysis on the CID segment to determine the full scope of impacts the Project will have on residents of the neighborhood. It must also conduct a visual analysis to fully document the impacts of station construction on the aesthetics of the CID. Sound Transit must then share those results with neighborhood stakeholders for feedback before issuing the final EIS.

The CID is still in the middle of two public health crises, COVID-19 and anti-Asian racism, which has tested the neighborhood’s resiliency and which were not fully considered when the DEIS was drafted.

COVID-19 has had a profound and ongoing impact on the Asian Pacific Islander (“API”) community broadly and on our patients and clients specifically. Our API population has been affected by many of the same problems as the general community, including impacts on their health, mental health, and finances. Unfortunately, COVID-19’s association with China, where the virus first emerged, compounded underlying racism with overt anti-Asian hate. The result has been two intertwined epidemics: COVID-19 and anti-Asian xenophobia. Across the CID, this has led to residents and businesses regularly experiencing threats of violence, and in several cases being victimized by violence. The devastating effects of both cannot be taken lightly when determining how to introduce a years-long infrastructure project to the neighborhood.

In Appendix G “Environmental Justice,” Sound Transit acknowledges that the disproportionate impacts of COVID-19 on communities of color “further underscores the need to center communities of color and low-income populations in the analysis and engagement on the project” (Appendix G, page 4-7). However, there is inconsistent application of this critical analytic lens across the DEIS, making it difficult to fully appreciate how the CID will bear both the ongoing burden of COVID-19 and the new burden of the WSBL project for the 5-10 years of station construction.

The ongoing stresses of COVID-19 have been especially difficult for seniors in the CID, many of whom are low-income, speak English as a second language, and have health issues. They live throughout the CID in independent senior living buildings like International House on Maynard Avenue S and S Weller Street, Nikkei Manor on 6th Avenue S and S Dearborn Street, and in ICBS’s assisted living facility Legacy House on 8th Avenue S and S Lane Street. While none of these locations themselves are directly at the site of a CID station alternative, the hundreds of

limited mobility seniors who live here and in other residences throughout the neighborhood would no doubt be affected. Due to COVID-19 many seniors have not been able to physically gather with their family and friends until recently. The well-documented anti-Asian violence is known to and has been experienced by many seniors, who have expressed fear or hesitation to leave their homes as a result.

Forcing street closures, traffic reroutes, and transit relocations on a mobility-compromised population that is already fearful about moving through their own neighborhood should not be undertaken lightly. However, there is little discussion of COVID-19 and virtually no discussion of the anti-Asian violence in the DEIS, despite the DRAFT Racial Equity Toolkit Environmental Review clearly identifying both as a cause for concerns about neighborhood safety (page 38). Sound Transit needs to incorporate an analysis of the impacts that COVID-19 and anti-Asian violence have had on the CID as part of their assessment of cumulative impacts of all Project alternatives.

Conclusion

The DEIS lays a solid foundation for preliminary assessment of the WSBLE project. As stated at the beginning of these comments, ICHS supports the expansion of mass transit throughout the region as a matter of economics and as a matter of equity. However, the DEIS currently skims or ignores several critical areas of analysis that directly impact the CID and would have significant bearing on any determination of a preferred station alternative. These must be addressed before the Project can move forward.

To that end, ICHS strongly urges Sound Transit to do the following:

- Conduct additional analysis on the impacts a new major infrastructure project would have to the CID from a racial equity lens;
- Include surface noise and visual impacts as part of any new analysis for the CID Station;
- Include COVID-19 and anti-Asian violence impacts as part of an updated analysis for the Project alternatives' impacts on the CID;
- Conduct full analysis on the scope of impacts, both immediate and downstream, that the 5th Avenue alternatives will have on the CID; and
- Bring your updated analyses to CID community stakeholders for public review and feedback prior to completing and issuing the final EIS.

Sincerely,



Teresita Batayola
President & Chief Executive Officer
International Community Health Services

April 21, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104
Email: WSBLEDEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of Interbay Rising West, LLC, which is the owner of the property located at 1616 W. Bertona Street (TPN 2771102355) (the “Property”) to provide comments on the Draft EIS for the WSBLE project. The Property is currently home to a surface parking lot but will soon be the new headquarters and practice facility for the Seattle Storm.

For an EIS to be adequate, it must describe the project in sufficient detail to allow for project impacts to be characterized; then it must fully describe and evaluate those impacts and propose mitigation for them. The Draft EIS does not meet this test. Impacts on the Property from various alternatives are not described, which is because Sound Transit knows too little about the details of WSBLE plans to be able to characterize those impacts. As an unavoidable result, the Draft EIS is therefore also unable to outline and evaluate mitigation.

Our comments are as follows:

- The Draft EIS shows various above and below grade alternatives affecting the Property. But the Draft EIS does not describe how much of the Property will be taken for WSBLE purposes or what the impact will be on the portion of the Property that is remaining.
- The Draft EIS does not disclose the method, scope, or duration of construction on and around the Property and in the Interbay area. Because of this lack of information, it is impossible to characterize the likely impacts of the WSBLE project on many issues relating to the Property, including:
 - Transportation and transit service;
 - Access;
 - Noise;
 - Vibration;

- Congestion;
- Potential increases in crime.


All of these issues should be discussed in detail in the Draft EIS, but only when the Draft EIS is able to adequately describe the WSBL project.

- The locations, durations, and extents of street closures in the vicinity of the Property – all of which will have major impacts on the Property – remain speculative in the Draft EIS. Much more work must be done to define these closures and to provide a menu of effective mitigation for them.

We support the WSBL project and believe that when it is complete it will bring significant benefits to Interbay and along the corridor as a whole. But while the end goal is laudable, the purpose of the Draft EIS is to evaluate the environmental cost of achieving that goal – as measured in impacts to the natural and built environment – and to find ways to reduce that cost. The Draft EIS does not meet this test, so Sound Transit should prepare a supplement to the Draft EIS that fully describes the WSBL project and evaluates all impacts associated with the proposal.

We appreciate the opportunity to provide these comments.

Sincerely,



Ginny Gilder
Manager, Interbay Rising West, LLC
GILDER OFFICE FOR GROWTH, LLC

Sound Transit Projects

Details	Communication
<div>#504079</div> <div><div>From:</div><div>Tom Dang</div></div> <div><div>Date Recieved:</div><div>4/28/2022</div></div> <div><div>Created by:</div><div></div></div> <div><div>Audience:</div><div></div></div> <div><div>Reach:</div><div></div></div> <div><div>Participation:</div><div></div></div> <div><div>Engagement:</div><div></div></div> <div><div>Source:</div><div>Online open house</div></div> <div><div>Assigned division:</div><div>Outreach</div></div> <div><div>Category:</div><div></div></div> <div><div>Project Phase:</div><div>Planning</div></div> <div><div>Project Segment:</div><div></div></div> <div><div>Environmental phase:</div><div>Draft EIS</div></div>	<div>(This comment is submitted by Lillian Young on behalf of Tom Dang)</div> <div>I am the owner of International Model Toys at 524 S King St.</div> <div>Suppose the 5th Ave diagonal option is chosen. In that case, American Hotel and its tenants, which need to be temporarily relocated, should be compensated for the loss of business instead of being asked to relocate to other locations for just a few months. The best option for these businesses is to stay put.</div> <div>First of all, it is not economical to sign a less-than-one-year lease. It isn't easy to find such a location, and the terms won't be good. Also, it will take a substantial amount of time to move, relocate, and reconfigure all the furnishing and products. You may also need to apply for City permits for changes or tenant improvement. It could take up to 3-4 months to get a permit. By the time you finish setting up, you'll have to move back. It doesn't make sense to go through all the trouble for nothing or only conduct business in the new location for just a month or two.</div> <div>It takes years to market, promote, and establish in a new location. It takes years to build a business.</div> <div>We should be able to get compensated for the loss of business, whether it's salary, rent, revenue, etc. We should stay put, leave the premise while under construction for 8-10 months, then return and resume business.</div>

Sound Transit Projects

Details	Communication
<div>#505643</div> <div>Date Recieved: 3/17/2022</div> <div>Created by: Nasra Mohamed</div> <div>Audience: General Public</div> <div>Reach:</div> <div>Participation:</div> <div>Engagement: 1</div> <div>Source: Comment form</div> <div>Assigned division: Outreach</div> <div>Category:</div> <div>Project Phase: Planning</div> <div>Project Segment:</div> <div>Environmental phase: Draft EIS</div>	<div>[translated from Chinese]</div> <div>No matter the station build on the 4th or 5th Ave, it's just across a street and it won't be a big different towards him. However, the most important thing is, the geography needs to be coordinated with this project and built out the station as soon as possible. I hope this project could bring in business opportunities in a future.</div>

Sound Transit Projects

Details	Communication
#504650 Date Recieved: 4/28/2022 Created by: Cecelia Gunn Audience: General Public Reach: Participation: Engagement: Source: Email Assigned division: Outreach Category: Project Phase: Planning Project Segment: Environmental phase: Draft EIS	<p>WSBLE Draft Environmental Impact Statement Comments</p> <p>c/o Lauren Swift Sound Transit 401 S. Jackson St. Seattle, WA 98104 Email: WSBLEDEIScomments@soundtransit.org<mailto:WSBLEDEIScomments@soundtransit.org></p> <p>Re: Dear Ms. Swift:</p> <p>We are writing on behalf of Kassel and Rebecca Gottstein Company and LAC Investments, which is the owner of the properties located at 413 Pine Street, Seattle, WA 98101 (the "Property") to provide comments on the Draft EIS for the WSBLE project. The Property is currently the home to the Downtown Anthropologie store and numerous office tenants.</p> <p>We are concerned that the Draft EIS does not present a thorough or adequate representation of the probable impacts of the WSBLE project, both with respect to the Property and to the Downtown as a whole. Our comments are as follows:</p> <ul style="list-style-type: none"> ◦ The Draft EIS shows a future light rail station entrance located on the Property. But the Draft EIS does not describe how much of the Property will be taken for WSBLE purposes or what the impact will be on the portion of the Property that is remaining. ◦ Likewise, the Draft EIS indicates that the entire Property may be within the construction limit for this station entrance, but provides no indication of the impact to the Property, even though it is not proposed to be part of the station entrance. ◦ The Draft EIS does not disclose the method, scope or duration of construction on and around the Property and throughout Downtown. Because of this lack of information, it is impossible to characterize the likely impacts of the WSBLE project on many issues relating to the Property and Downtown, including: <ul style="list-style-type: none"> ◦ Transportation and transit service; ◦ Noise; ◦ Congestion; ◦ Potential increases in crime; ◦ Loss of sales and rental value and corresponding decreases in property value. <p>All of these issues should be discussed in detail in the Draft EIS, but only when the Draft EIS adequately describes the WSBLE project.</p> <p>Sound Transit should prepare a supplement to the Draft EIS that fully describes the WSBLE project and evaluates all impacts associated with the proposal.</p> <p>We are concerned that the WSBLE project will have a significant impact on the use and valuation of the Property specifically, and of portions of Downtown generally. The Draft EIS must disclose all such impacts for public review.</p> <p>We appreciate the opportunity to provide these comments.</p> <p>Sincerely, Jill D. Leedom President, Kassel and Rebecca Gottstein Company</p> <p>Laurie A. Crocker LAC Investments</p>

Sound Transit Projects

Details	Communication
#504405 Date Recieved: 4/26/2022 Created by: Cecelia Gunn Audience: General Public Reach: Participation: Engagement: Source: Email Assigned division: Outreach Category: Project Phase: Planning Project Segment: Environmental phase: Draft EIS	<p>Thank you for the opportunity to comment on the Draft EIS for the Light Rail project extension to Ballard. Keller Supply (and or our related entities) is the owner of 3 buildings in the vicinity of the proposed Interbay station. Our property is located at 3205 and 3209 – 17th Ave West and 3210 – 17th Ave West. The preferred alternative for the Interbay Station looks like it will go right through our 2 buildings at 3205 and 3209 – 17th Ave West. We are not sure if the project will affect our building at 3210 – 17th Ave West, however, even if it does not directly impact the building, based upon our operational structure, if we lost 3209 – 17th Ave West, it would be impractical to retain occupancy at 3210 due to the fact that the two operations work closely together. We would have to move both of them.</p> <p>Keller Supply is a locally owned family business. We've been operating in Seattle for over 75 years and at the Interbay location for probably 50 years, although I would need to check that date for the exact time. Point is – we've been in Interbay for a long time. Too many longtime local family businesses have been forced out of Seattle. The City and the community cannot afford to keep sending these businesses out to pasture.</p> <p>The loss of our buildings would cost a lot of jobs. We have somewhere in the range of 100 employees. The warehouse is one of several we operate in the Seattle Metropolitan area. If we lost the Interbay Warehouse, we would need to replace it somewhere fairly close to Interbay. We already have locations on the East side and North and South of Seattle, so it would do us no good to replace the branch anywhere but in close in Seattle. Finding a warehouse and outside storage yard to fit our needs in close in Seattle will be virtually impossible, so it's like the branch would simply be closed and the jobs lost forever.</p> <p>I understand there are no perfect locations. Someone will be adversely affected by any project of the scale of this Light Rail expansion. However, some locations have fewer adverse effects than others. If Sound transit continues to displace jobs, we are not going to need light rail because there will be no jobs for people to go to. Please do what you can to save our jobs and find an alternate location.</p> <p>Thank you for your consideration.</p> <p>Stuart Sulman</p> <p>Vice President – Real Estate</p> <p>Keller Supply Company</p> <p>3209-17th Ave West</p> <p>Seattle, WA. 98119</p> <p>(206) 273-7205</p>



Kidspace Childcare Center
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FAX: (206) 282-1939
www.kidspaceseattle.org

April 27, 2022
WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson Street
Seattle, WA 98104-2826

Via email to WSBLEDEIScomments@soundtransit.org

*Re: Comments on West Seattle and Ballard Link Extension Draft
Environmental Impact Statement for Kidspace Childcare Center*

Dear Ms. Swift,

This letter is submitted by Kidspace Childcare Center (“**Kidspace**”) in response to the West Seattle and Ballard Link Extension (the “**WSBLE**”) Draft Environmental Impact Statement (“**DEIS**”) published by Sound Transit.

Kidspace is a not-for-profit childcare facility located at 3837 13th Avenue W, Suite #200 in Seattle. Kidspace currently serves 70 children per day and employs 30 staff members.

Kidspace writes to express strong support for a tunnel alternative for the Interbay-Ballard segment of the WSBLE. While selection of a tunnel alternative would still require analysis of construction and operational impacts, an elevated 14th Avenue West approach for the Interbay-Ballard segment would permanently displace Kidspace. As access to quality childcare is already at a crisis point in Seattle, displacement of Kidspace would only exacerbate this public policy crisis.

I. Background on Kidspace

Kidspace was established in 1982 and has been a tenant in the Nickerson Business Center building since 1998. Kidspace is a not-for-profit corporation that operates under a parent-based board of directors. Kidspace is licensed through the state of Washington, accredited by the National Association for the Education of Young Children, and has long been recognized at the local, state, and federal level as a leader in early learning childcare.

Kidspace provides a safe, caring, and child-centered learning environment for approximately 70 children each day, serving children from as young as 3-months old until kindergarten (including children from families who qualify for subsidies). In addition to classroom activities, children are exposed to music, dance, Spanish, and sign



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www.kiddspaceatlanta.org

language, as well as curriculum centered on diversity, equity, and inclusion. Kiddspace employs approximately 30 teachers and staff members.

Kiddspace is more than just a tenant in a commercial building; it is a long-standing community of children, families, and staff. Lead teachers have taught at Kiddspace for an average of 15 years. Children who attended Kiddspace in its early years are now sending their children to Kiddspace and, in some cases, alumni have become teachers and staff members at Kiddspace. Displacement of Kiddspace is a loss that would impact hundreds of kids, staff, families, and community members that simply cannot be easily replaced.

II. The Final Environmental Impact Statement (“FEIS”) Must Analyze the Potential Displacement of Kiddspace Under Elevated 14th Ave W Alternatives

The loss of Kiddspace under the elevated 14th Avenue W alternatives needs to be specifically analyzed and considered in Sound Transit’s decision-making. Relocating an established childcare center is exceptionally difficult, in part because of unique regulatory requirements for childcare, including required outdoor space. Vacant childcare spaces are few and far between, while high-quality childcare spaces that exceed the baseline minimum requirements of these already specialized spaces usually require substantial upfront investment. Kiddspace has invested hundreds of thousands of dollars into its facilities to ensure it meets licensing regulations and is an optimal environment for children, families, and staff.

Moving a childcare center to a new neighborhood causes severe disruption of service and prohibits many families who are unable to accommodate longer commutes from continuing to access care. Attending a neighborhood school reduces traffic (including the climate-impacting consequences of longer commutes) and allows families to build community. The residents of Queen Anne, Magnolia, Ballard, and Fremont have relied on Kiddspace for many years.

The DEIS analysis of potential business displacement is inadequate, framing the issue as follows:

Property availability will change over time, but research indicates that there are adequate opportunities for most residents and businesses to successfully relocate within the project vicinity. Some affected properties with unique characteristics or uses, such as water-dependent uses, assisted living and supportive housing, and public facilities could be difficult to relocate and may require construction of new facilities.

WSBLE DEIS, Section 4.3.1.8. This list neglects to include childcare, even though it is a use with “unique characteristics.” The FEIS must more fully consider the impacts of a



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loss of 70 daily childcare spaces.¹ Given the materially adverse public policy implications and distinctive features of a high-quality early learning center, simply lumping the loss of a renowned childcare together with other displaced businesses is inappropriate.

There's a critical shortage of quality childcare in Seattle right now. Kiddspace alone currently has a waitlist of over 400 families, with most families waiting at least several years to access enrollment. Unfortunately, Kiddspace families' experience with childcare availability is the norm in the region. An astounding 40% of families with kids under 5 in the Seattle metro area could not access licensed childcare.² Roughly 550,000 kids in Washington State lacked access to licensed childcare services³ – and that was prior to the COVID-19 pandemic forced the permanent closure of approximately 9% of all childcare facilities.⁴ The loss of one childcare facility will have an unfortunate ripple effect on the childcare crisis, and the DEIS needs to fully consider the loss.

III. Impacts to Kiddspace during Construction and Operation of the Other Alternatives

Kiddspace's paramount priority is avoiding displacement and continuing to operate at the current facility. As the analysis in the FEIS evolves, hopefully with a preferred alternative that does not physically displace Kiddspace, Sound Transit should acknowledge and analyze impacts to Kiddspace as a childcare space.

- Daycare facilities are called out as “sensitive receptors” for air quality impacts. WSBL DEIS, Section 4.3.6.1.7. However, it is not apparent Kiddspace was analyzed for air quality impacts under the alternatives.

¹ The loss of “a daycare center” is identified in the preferred alignments, but it is not clear if the daycare is Kiddspace or another daycare. WSBL DEIS, Section 4.3.4.3.6. And the analysis is not specific enough around the number of childcare spaces displaced or any details about the facility or impacts.

² United States Census Bureau Week 41 Household Pulse Survey, December 29, 2021 – January 10, 2022. Available at <https://www.census.gov/data/tables/2021/demo/hhp/hhp41.html>, highlighted in “Where the Child Care Crisis is Hitting America the Hardest” by Sharon Lurye, US News, February 1, 2022, available at <https://www.usnews.com/news/best-states/articles/2022-02-01/states-where-families-have-the-biggest-challenge-finding-child-care>.

³ “Washington State Child Care Industry Assessment Report to the Legislature” by the Child Care Collaborative Task Force of the Washington State Department of Commerce, July 1, 2020. Available at <https://www.commerce.wa.gov/wp-content/uploads/2020/08/Child-Care-Collaborative-Task-Force-Industry-Assessment-Report.pdf>.

⁴ “Exacerbated by pandemic, child care crisis hampers economy,” by Josh Boak and Sally Ho, The Associated Press, October 27, 2011, citing estimates by Child Care Aware. Available at <https://www.seattletimes.com/business/exacerbated-by-pandemic-child-care-crisis-hampers-economy/>.



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- Daycares are Category 3 sensitive uses for noise and vibration. *Id.* Section 4.3.7.1. However, Kidspace was not called out on the list of Category 3 uses. *Id.* Children attending Kidspace would have sensitivities to noise because of naptimes throughout the day.
- Kidspace will also be impacted by roadway closures and will need to maintain adequate access, parking, and loading. These roadway closures include anticipated night and weekend closures of Nickerson Street, full closures of W Emerson Street, and closures of roads in Ballard and Interbay that many families rely on. DEIS Transportation Technical Report, Table N.1E-33 to 37. Similarly, potential impacts to pedestrian and bike infrastructure and access should be analyzed and mitigated with the identified roadway closures. Closures or rerouting of these important amenities will affect traffic patterns, demand for public transit, and recreation opportunities, among other impacts. Notably, the tunnel alternatives have considerably fewer transportation impacts on Kidspace.

Kidspace is confident that it can work with Sound Transit to successfully navigate these potential impacts and expects to stay open in its current location for many years under a tunnel alternative.

IV. Requested Mitigation

Kidspace sincerely hopes Sound Transit will support an alternative that avoids displacement of Kidspace, thus preserving its ability to provide high-quality childcare in this specialized facility amid the region's childcare availability crisis.

Kidspace would require significant financial and logistics support if it is displaced. Kidspace would require further conversations with Sound Transit about how to adequately address loss of the facility and service to dozens of families.

Even if Kidspace is not displaced, additional analysis about noise, vibration, air quality, and transportation impacts and commensurate mitigation to allow Kidspace to continue providing vital childcare services are requested.

VI. Conclusion

In sum, Kidspace strongly supports a tunnel alternative for the Interbay-Ballard WSBL segment. Although a tunnel alternative still necessitates analysis of construction and operational impacts to Kidspace, a tunnel would be a vast improvement over the 14th Avenue West approach, which would displace Kidspace and create an extraordinary disruption to the many families and staff members that rely upon Kidspace. Such high-quality childcare services, with Kidspace's facilities at the nexus of so many residential neighborhoods, are unlikely to be adequately replaced, thus exacerbating the already



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critical shortage of quality childcare in the region. Kidspace strongly urges selection of a tunnel alternative.

Sincerely,

Kidspace Board of Directors

Ericka Sisolak
President
Kidspace Board of Directors

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 South Jackson Street
Seattle, WA 98104-2826

April 26, 2022

Dear Ms. Swift,

I am writing on behalf of Kilroy Realty Corporation ("Kilroy") to provide comments on the Draft Environmental Impact Statement ("DEIS") for the Sound Transit 3 project ("ST3" of the "Project"). Kilroy is the owner of multiple properties along both the preferred and alternative routes of the Project, including 333 Dexter comprising the block bound by Dexter, Thomas, Aurora, and Harrison ("Dexter"); SIXO Lloyd at 1818 6th Ave, The SIXO at 1815 6th Ave, and SIXO Living at 621 Stewart St (collectively "SIXO"); 401 Terry at Harrison and Terry ("401 Terry"); 2001 Eighth Ave ("West 8th"); and 320 Westlake Ave N and 321 Terry Ave N (collectively "Westlake Terry").

First and foremost, Kilroy is in support of the Project. As a worldwide leader in sustainability, we understand and appreciate the need for a robust and effective public transportation system that serves the economic hubs within cities. We applaud Sound Transit's staff and board for moving this Project forward and for thoughtfully engaging with community stakeholders to ensure that ST3 is the best it can be and serves the needs of everyone in the community.

With that in mind, we do have some comments on the DEIS and legal deficiencies within the document. Specifically, the DEIS does not adequately describe the impacts, both temporary and permanent, to our property or the neighborhood in which it is located. It is impossible to characterize future impacts because the DEIS is based on an inadequate set of construction plans. ST3 plans are at less than 5% completion, which means that most key elements of the project are not yet defined. For example, we do not know the actual construction methodology, so that noise and vibration impacts cannot be estimated; actual street closure locations and durations, so that greenhouse gas impacts from traffic congestion cannot be estimated; or the duration and sequencing of construction activities, in order to determine the cumulative impacts of construction work on the urban environment. Without understanding these impacts, it is impossible to evaluate the proposed mitigations or to determine whether there are alternative mitigations that should be considered. As a result of not adequately describing potential impacts and not enabling an adequate review of mitigations, the DEIS fails to meet its legal requirements.

We understand that Sound Transit has developed, and is continuing to develop, more specific construction plans and guidelines. This work would help to characterize SEPA impacts, but this information has not been included in the DEIS. As a result, ST3 should utilize a phased review process under SEPA. Due to the infancy of the project plans, the desire to defer actual construction decisions to some future contractor and the lack of information about most impacts, it is appropriate to phase this SEPA review so that review of actual on-the-ground impacts can occur in the future at a time when there is adequate information to support that review. The current DEIS is not a project action EIS, since the actual project is hardly defined at all; it is more in the nature of an early programmatic EIS, which anticipates the need for additional future SEPA review. While it may be appropriate to make large-scale decisions about corridor alignment through this EIS process, future decisions about construction methodology, street closures, final station entrance locations and their design, should require future SEPA review when facts and information are available to allow that review to occur adequately.

With respect to our various properties, our specific concerns are:

- SIXO: Below grade construction affecting development in one alternative; taking of the site in one alternative; traffic congestion; street closures; noise; vibration; other construction impacts.
- 401 Terry: Below grade construction affecting development in one alternative; traffic congestion; street closures; noise; vibration; other construction impacts.
- Westlake Terry: Below grade construction affecting development in one alternative; street closures; noise; vibration; other construction impacts.
- Dexter: Street closures; noise; vibration; other construction impacts and loss of access on only garage and loading primary garage access.
- West 8th: Street closures; noise; vibration; other construction impacts, maybe below grade construction

We appreciate your consideration of our comments on the DEIS and look forward to continued collaboration between Kilroy and Sound Transit to make ST3 a success while minimizing disruptions to the community.

Sincerely,

Reza Marashi
Director, Government Affairs
Kilroy Realty Corporation

Sound Transit Projects

Details	Communication
#504597	Councilmember Alex Pederson,
Date Recieved: 4/20/2022	We have been business owners in Japantown/CID for 18 years. We are very concerned how these proposed Sound Transit expansion plans will affect the future of the CID. We are disappointed that none of these options were developed in partnership with the CID community who are directly impacted by the outcome of this project. Sound Transit's snapshot today of External Engagement which includes the number of social media posts, number of open houses, number of posters produced, number of draft EIS comments, only 820 comments to date , does not measure the effectiveness of their outreach efforts to the community.
Created by: Cecelia Gunn	From my vantage point they have done an inadequate job in imparting important information to the CID community that would affect livelihoods and the neighborhoods where people live, work and enjoy as a center for community life. Sound Transit has done a poor job in centering the CID community in the development of this project. Sound transit has not adequately communicated to our community how the expansion would affect the physical landscape of the area permanently, and how the construction project would create road closures in the heart of the CID, reroute traffic, affect parking and impact the economic viability of the CID.
Audience: General Public	
Reach:	
Participation:	
Engagement:	Sound Transit summarizes information from the Draft EIS in snapshots in meetings, has copies and maps of the Draft EIS and directs the community to cull through the material to make heads and tails out of the pages of materials available online. Sound Transit representatives have referenced the CID/SODO Community Advisory Group as an example of working with CID community members on this process; however, this attempt to engage with the greater CID falls short considering the magnitude of how this expansion project will affect this cultural regional hub profoundly and in the long term. There was not enough outreach during the recruitment process in order to ensure this community advisory group represented our community. This advisory group also seems to have little influence and the advisory group's concerns have not been adequately addressed.
Source: Email	
Assigned division: Outreach	
Category:	The CID is one of eight Seattle neighborhoods designated as a historic district. The City made this commitment to make this designation to protect an important cultural asset and cultural regional hub. POC neighborhoods such as Chinatowns around the country have often been subjected to large scale projects pushed upon them that are detrimental to the long term survival of these precious and unique neighborhoods.
Project Phase: Planning	We cannot emphasize enough how essential it is to protect and preserve these neighborhoods today before they are lost forever to displacement, demolition and disruption that would destroy this unique neighborhood as we know it.
Project Segment:	
Environmental phase: Draft EIS	<p>The CID community is presented with 5 options today. The most devastating are the 5th Ave. options. These options would displace 19 businesses, involve long term road closures, reroute traffic through and around the neighborhood, create pollution and environmental harm to residents, businesses, visitors and to all who frequent the CID. Not to mention that there would be great adverse economic impact from street closures that could last several years in the heart of the CID.</p> <p>With only these 5 options before us we can only support the least harmful of these options for our neighborhood, which would be one of the 4th Ave options.</p> <p>This option is not without harmful impact to the CID involving 4th Ave closure from Main to Jackson Streets for four years and 9-11 years of construction. This construction project would also adversely the CID, but the 5th Ave Options are much more invasive and devastating to our community and would serve to displace beloved small businesses and demolish buildings within the Historic District. Even with Sound Transit mitigation money or relocation assistance, these displaced businesses may choose never to return to the CID and the CID could lose these businesses to other neighborhoods. This proposed project would lead to the destruction of part of the CID neighborhood, which has already been threatened in the face of gentrification and development, along with the pandemic and the rise of anti-Asian racism.</p> <p>I urge the City Council and Sound Transit board to approach this project from a racial equity perspective. Take into account the history of the CID which exists due to the racist history of redlining and segregation in Seattle. The significance of this neighborhood to greater Seattle and Asian American communities, and the needs of the local CID businesses and residents who call this place home must be protected at all costs.</p> <p>Sincerely,</p> <p>John and Binko Bisbee</p> <p>KOBO Gallery & Shop at Higo</p> <p>604 South Jackson Street</p> <p>Seattle, WA 98104</p> <p>206-755-8900</p> <p>KOBO</p> <p>604 South Jackson Street</p> <p>Seattle, WA 98104</p> <p>KOBO</p> <p>814 East Roy Street</p> <p>Seattle, WA 98102</p>

Sound Transit Projects

Details	Communication
#504890	Sound Transit
Date Recieved: 4/27/2022	We have been business owners in Japantown/CID for over 18 years. Our business, KOBO Shop & Gallery is located in the historic HIGO Variety Storefront at 6th and Jackson Streets. The CID has endured several disruptive public infrastructure projects in its long history that have imposed devastating impacts to our community while being recognized as an invaluable cultural and historic asset to the city and the region today. In 2012 we endured the construction of the street car that lasted for 2-3 years. During that time several businesses in the CID were not able to hang on and wait for the construction to finish. Many businesses
Created by: Christopher Johnstone	were not able to endure the devastating effects of the construction and ended up closing permanently. This was a great loss to our community. We have just endured the punishing economic crisis brought about by the COVID pandemic and still reeling from its effects. We have lost several businesses in the CID during the pandemic.
Audience: General Public	We are very concerned about how these proposed Sound Transit expansion plans will affect the future of the CID. We are disappointed that none of these options were developed in partnership with the CID community who are directly impacted by the outcome of this project.
Reach:	
Participation:	We are against all of your proposals and variations you have presented for the CID Sound Transit Station Hub. There has been inadequate transparency in how these proposals were developed and why other locations farther south such as in SODO, or areas near the stadiums were not presented as options for consideration. Why haven't other locations been considered that would not encroach upon and destroy a historic landmark district and neighborhood , the Chinatown International District? Why not select a location that would not destroy blocks of our neighborhood or impact it with adverse rerouting of traffic, blocking traffic for years at a time that would effectively permanently destroy the fabric of our community.
Engagement:	
Source: Email	The CID is one of eight Seattle neighborhoods designated as a historic district. The City made this commitment to make this designation to protect an important cultural asset and cultural regional hub. POC neighborhoods such as Chinatowns around the country have often been subjected to large scale projects pushed upon them that are detrimental to the long term survival of these precious and unique neighborhoods. Why is our community only presented with two main alignment choices, 4th and 5th Aves? This represents a complete disregard for the preservation of an important historical and cultural asset in City of Seattle.
Assigned division: Outreach	We cannot emphasize enough how essential it is to protect and preserve these neighborhoods today before they are lost forever to displacement, demolition and disruption that would destroy this unique neighborhood as we know it.
Category:	
Project Phase: Planning	The CID community is presented with 5 options today. The most devastating are the 5th Ave. options. These options would displace 19 businesses, involve long term road closures, reroute traffic through and around the neighborhood, create pollution and environmental harm to residents, businesses, visitors and to all who frequent the CID. There would also be great adverse economic impact from street closures that could last several years in the heart of the CID.
Project Segment:	This proposed project would lead to the destruction of the CID neighborhood, which has already been threatened in the face of gentrification and development, along with the pandemic and the rise of anti-Asian racism.
Environmental phase: Draft EIS	I urge the Sound Transit board to approach this project from a racial equity perspective. Take into account the history of the CID which exists due to the racist history of redlining and segregation in Seattle. The significance of this neighborhood to greater Seattle and Asian American communities, and the needs of the local CID businesses and residents who call this place home must be protected at all costs.
	Sincerely, John and Binko Bisbee KOBO Gallery & Shop at Higo 604 South Jackson Street Seattle, WA 98104 206-755-8900 www.koboseattle.com

April 28, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104
Email: WSBLEDEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of KRE 300 PINE OWNER LLC, the owner of the former Macy's/Bon Marche property located at 300 Pine Street (TPN 8634230000) (the "Property") to provide comments on the Draft EIS for the WSBLE project.

Macy's recently closed its store at the Property and the ownership has invested hundreds of millions of dollars in a top-to-bottom rehabilitation of the building. The building is now home to thousands of jobs and over 100,000 s.f. of retail and entertainment uses. Since the 1980's, the building has benefited from its integrated connections to the 3rd Avenue Sound Transit tunnel. We support the WSBLE project and the opportunity to expand light rail accessibility throughout Downtown.

There will be significant impacts associated with developing a light rail project of this scope through the middle of Downtown Seattle. These impacts will include long-term street closures on Pine Street, 4th Avenue and other streets in the proximity of the Property. In addition, major new construction for the expanded Westlake Station will occur on large portions of the two blocks east of the Property for many years.

We are concerned about the following impacts:

- Congestion. Multiple long-term street closures in the vicinity will create substantial traffic congestion, making access to the Property challenging over a long period of time. These congestion impacts will also adversely affect the functionality of Metro transit service Downtown for years.
- Noise. Long-term construction noise will impact the functionality of the workspace in the building. Vibration effects from below-grade construction next door will have similar effects.
- Urban Design. The current concepts for large, free-standing station house structures at Westlake Center and 5th & Pine, literally across the street from the Property, will be a blight on the urban environment of the retail core. Sound Transit must find ways to integrate its station entrances into the existing built environment, just as the 3rd Avenue Tunnel did almost 40 years ago.
- Security. The vitality of the building and its operations depends critically on its connection to the retail core to the east. We are all aware of the challenges the City has faced for years along 3rd Avenue and at 3rd & Pine in particular. The massive construction site immediately east of the Property, together with numerous street closures nearby, will have the effect of isolating the Property from the vibrant uses and pedestrian traffic in the retail core. Such isolation will only exacerbate existing trends of anti-social behavior in the 3rd & Pine area, further condemning this area and corridor Downtown to many more years of continued blight. It is critical that Sound Transit provide security and invest mitigation resources in the 3rd Avenue corridor to ensure these impacts do not occur.

The construction impacts associated with the 3rd Avenue tunnel in the 1980's had a severe impact on the safety and livability of the entire corridor. We must not forget this important lesson. The Draft EIS should do a better job of describing the impacts noted above and devising comprehensive mitigation strategies to protect this fragile retail environment in the center of Downtown.

Sincerely,



Shawn Jackson
Managing Director
Urban Renaissance Group, LLC

cc: Jack McCullough jack@mhseattle.com

KWP, Inc.

April 25, 2022

WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift

Sound Transit

401 S. Jackson St.

Seattle, WA 98104

Email: WSBLEDEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of KWP, Inc., which is the owner of the property located at 201 Terry Avenue N. (TPN 1986200265) (the "Property") to provide comments on the Draft EIS for the WSBLE project. The Property is presently developed with a small office building and a surface parking lot. The Property is zoned SM-SLU 175/85-280, which indicates that a 28-story apartment building is feasible on the Property. Buildings of similar or greater scale have been developed in the immediate vicinity in the last five years.

The Property is held for investment purposes, for redevelopment as a high-density urban project like so many in the neighborhood. The plans for one WSBLE alternative alignment appear to pass beneath a portion of the Property. We are concerned that the relatively shallow depth of the tunnel in this location will seriously compromise future development of the Property.

WSBLE is intended to support increasing densities of development for jobs and housing in the Center City of Seattle. It would be ironic to say the least, and contrary to this objective, if the design of the WSBLE tunnel were to prevent the development of the very kind of project that the line is meant to promote. But we fear that will be the outcome of the alignment in this case.

Unfortunately, the Draft EIS does not provide adequate information to reach a conclusion on the impact on future development of the Property – and many other sites in the area – of the shallow depth tunnel. We expect that engineering considerations will dictate a maximum pressure that development above may place on the tunnel; but the Draft EIS does not discuss or attempt to characterize these limitations. This is unfortunate, since these limitations will determine the kind and scale of future development that can occur in the area, including the Property. This future development should be high-density transit-oriented development; but the impact of the tunnel may preclude this desired outcome and limit these sites to short, low-density buildings.

This outcome would be an adverse impact that the Draft EIS should evaluate.

Similarly, the proposed several-year closure of nearby streets will impose extraordinary hardships on nearby businesses, residents and projects. The Draft EIS should evaluate the impact of street closures, rather than just listing them, and explore alternatives to and mitigation for such closures.

In general, we support the Sound Transit project, but we are concerned that the Draft EIS does not describe the potential impacts of the WSBLE project on the Property and Downtown Seattle.

We therefore suggest that Sound Transit prepare a supplement to the Draft EIS that fully describes the WSBLE project and evaluates all impacts associated with the proposal.

We appreciate the opportunity to provide these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mary Kay McCaw', is written over the word 'Sincerely,'.

Mary Kay McCaw
President

MKM:ds

Sound Transit Projects

Details	Communication
#503132	To the Sound Transit Committee,
From: Ben Meyerson	Lighthouse Uniform Company has been operating successfully out of our 1532 15th Ave West, Seattle WA 98119 for 70 years. We pride ourselves on being a 4th generation family-owned and operated business. We are one of the few manufacturing direct entities left that provide dress uniform solutions to service members of our Military, Fire Departments, Merchant Marine, Public Health Service, Navy, Coast Guard, and others in cities around the country and military bases around the world.
Date Received: 4/28/2022	A key part of our opportunity to maintain long-term viability is the relationship we have with this property. Most of our employees have been with us for many years and live in proximity and take public transportation. Moving would create a hardship ranging from extended commutes to housing and even school changes. This will make it nearly impossible for everyone to continue working based simply on location change alone.
Created by:	
Audience:	
Reach:	Considering what we do is highly customized uniforms, to lose part of our tailoring team alone because of a move would decimate our ability to provide these services. Often times we are providing uniforms for line of duty funerals and these types of expedited services are completed by our in-house/local tailoring team.
Participation:	
Engagement:	Another challenge will be our inability to find a similar lease agreement anywhere near our current location. We are in the 1st year of a long-term lease renewal that can be extended beyond 10 years. The property is owned by a family trust that runs/leases this business. This is a massive part of why we are able to be successful and operate out of this location. For the last 70 years, including through the pandemic, this detail cannot be overlooked.
Source: Online open house	My hope as the 4th generation family member currently running the business is that we can see this business continue to grow out of the 1532 15th Ave W location. If we are fortunate, maybe the 5th generation will one day be interested in continuing the tradition of providing dress uniforms to those who protect and serve us.
Assigned division: Outreach	Hopefully, Sound Transit can find a way to proceed without needing this location. If the business is forced to move many families will be impacted and livelihoods will certainly be lost. Unfortunately, Seattle is an extremely expensive place to both live and run a business. Our hope is that you will look to use the property kitty-corner to us, and the many acres of empty space behind that property that should be available.
Category:	
Project Phase: Planning	If Lighthouse Uniform Company had known this would be the outcome, it would have purchased the property from the family members many years ago to safeguard against this.
Project Segment:	
Environmental phase: Draft EIS	If forced to move, we would require a property that is within a few miles, which includes a 20,000 plus square foot (relatively newly constructed) warehouse that is walk-in ready. In an ideal scenario, the city would gift the location to the business. This would enable us to increase pay to the employees in an attempt to incentivize them to move with us, knowing that even a few miles away may not be realistic. I can be reached via email or on my cell at 206-650-5754. Best regards, Ben Meyerson Lighthouse Uniform Company 1532 15th Ave W. Seattle, WA 98119

Sound Transit Projects

Details	Communication
#503221 From: Tanya Woo Date Recieved: 4/28/2022 Created by: Audience: Reach: Participation: Engagement: Source: Online open house Assigned division: Outreach Category: Project Phase: Planning Project Segment: Environmental phase: Draft EIS	<p>My family owns the Louisa Hotel In Chinatown on 7th and King. We are a historical building that contains 84 workforce housing units, and 7 commercial units. I grew up in this building and this neighborhood. My family's history is intertwined in this community.</p> <p>I do not support the 5th Ave S options because I believe that it is harmful to the community. We must protect the history and the culture of this historic minority neighborhood. This community had to endure years of Anti-Asian Hate, pandemic racism, and continues to struggle to survive.</p> <p>I implore Sound Transit to please continue to explore further ramifications of all its options and while all options are harmful to this community. The 4th Ave S options are the least harmful.</p> <p>Seattle Chinatown used to be near the waterfront but when that property became valuable, it was forced to move to what is today's Pioneer Square area. My great-great-grandfather owned a laundry business in 1884 on Commercial and Main (now 1st and Main). Chinatown was forced to move a second time in the 1900's to where it is today. Now this community has no where to move. We must try to keep the Chinatown International District (CID) whole.</p> <p>Please continue the dialogue and the research. I believe that the people who wrote this report do not know this community's history, culture or spirit. More work needs to be done to fully realize the scope of what you want to do.</p>

April 27, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104
Email: WSBLEDraftEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of MUI Terry LLC (Mack Real Estate Development), the owner of the property located at 1001 John Street/124 Terry Avenue N. (TPN 2693100055) (the "Property") to provide comments on the Draft EIS for the WSBLE project. The Property is the development site for a new 47 story, 415-unit apartment building with parking and retail uses (the "Project"). A Master Use Permit has been issued to permit development of the Project and building permits will be issued in 2022.

We are writing to express concerns about impacts associated with the development of the "alternative" Denny Station on Terry Avenue. These impacts on the Project will include significant street closures on 4th Avenue and other streets in the proximity of the Project. These closures may limit the use of other right-of-way areas for project construction and therefore may impact the construction of the Project. The Draft EIS should examine these impacts and identify ways to mitigate the street closures so as to avoid such impacts.

Our other specific comments are as follows:

- The Draft EIS fails to address the impact of street closures and construction staging areas on the vehicular, pedestrian and loading access for the Project and for other existing developments on Terry Avenue. Terry Avenue provides the sole access to the Project for loading access, parking garage access, move-in access for residents, garbage collection and utility services. A four-year closure of Terry Avenue in this location will render the Project unusable. The Draft EIS must identify specific mitigation to ensure that this access and service availability is not impaired by WSBLE.
- These street closures and construction staging areas may also impact the construction process for the Project, resulting in substantial potential damages. The Draft EIS must evaluate these impacts.
- The datacenter at 1000 Denny is served by literally millions of underground fiber lines (over 80 conduits), many of which may be affected by WSBLE construction activities. The Draft EIS should evaluate the indirect and secondary impacts of disruption of these facilities.
- The Draft EIS pays scant attention to the plans for development projects in the area. For example, the Draft EIS fails to note that the Project will already incorporate a public park, viewing platform, and hillclimb assist elevator at John Street, rendering separate WSLBE plans for a similar assist redundant.
- Construction of the Terry Street Station will require dewatering, tunnel drilling and vibration immediately adjacent to the foundations of the Project. The Draft EIS does not discuss the impacts that may arise from this construction activity nor possible mitigation to address these impacts.

We also offer the following more general comments on the Draft EIS:

- The Draft EIS does not adequately describe the impacts, both temporary and permanent, to our property or the neighborhood in which it is located. This is due to the fact that the Draft EIS is based on an inadequate set of construction plans, which makes it impossible to characterize future impacts. WSBLE plans are at less than 5% completion, which means that most key elements of the project are not yet defined, such as:
 - Horizontal and vertical control for each alignment alternative;
 - Actual construction methodology, so that noise and vibration impacts cannot be estimated;
 - Scope of above-grade construction limits;
 - Actual street closure locations and durations;
 - Pressure limitations to be imposed on future construction above tunnel locations, which dictates the nature and feasibility of future construction;
 - Scope and design of above-grade improvements associated with station entrance locations;
 - The duration and sequencing of construction activities, in order to determine the cumulative impacts of construction work on the urban environment.
- Above-grade construction associated with the WSBLE tunnel will necessarily involve identified station locations as well as presently unidentified other construction staging areas. The Draft EIS does not evaluate the impact of these significant surface activities on the South Lake Union urban environment and the businesses, residents and economy of the area. The Draft EIS does not attempt to characterize these likely impacts or to identify mitigation for them.
- All or portions of the WSBLE project may be proposed as design-build construction projects. As such, most decisions regarding construction means and methods is intended to be deferred to the general contractor, long after the completion of SEPA review. Although the design-build process may offer financial advantages to Sound Transit, it cannot be used to dodge the obligation for full review of environmental impacts under SEPA. Many impacts, including important noise and vibration impacts, will vary based on method of construction. The Draft EIS should include performance standards, minimum guidelines and specific requirements on design-build contractors to ensure that the environmental impacts of the project are fully mitigated.
- As noted, the timing, duration and location of possible street closures associated with the project are speculative. While a street closure at a regional scale may not be a significant issue, at a parcel and neighborhood level, a street closure of any duration will have significant adverse impacts, especially the Project, which has no other means of access. Loss of access to building parking garages and loading facilities would force the shut-down of buildings along Terry Ave N. And closures will have the effect of re-routing traffic to other rights-of-way, further congesting those locations. The Draft EIS does not attempt to evaluate these impacts, nor can they reasonably be evaluated until a more definitive street closure plan can be developed in the future.

- The very preliminary plans for future station entrance locations included in Appendix J to the Draft EIS show that Sound Transit intends to take over large chunks of city blocks throughout Downtown Seattle for oversized station entrance structures. Some of these sites occupy full quarter blocks or more, such as the proposed Denny Station at Terry Avenue. The Draft EIS fails to evaluate several issues associated with this overdevelopment of station entrances, including:
 - The loss of existing businesses, jobs and housing resulting from such station entrances;
 - The impact to the urban environment resulting from the substitution of sterile station entrances for thriving urban businesses and retail uses.
 - The loss of hundreds of jobs and housing units that would otherwise have been developed on the sites of the station entrances.
- We understand that Sound Transit has developed, and is continuing to develop, more specific construction plans and guidelines. This work would help to characterize SEPA impacts, but this information has not been included in the Draft EIS.
- The WSBLE EIS should be conducted as part of a phased review process under SEPA. Due to the infancy of the project plans, the desire to defer actual construction decisions to some future contractor and the lack of information about most impacts, it is appropriate to phase this SEPA review so that review of actual on-the-ground impacts can occur in the future at a time when there is adequate information to support that review. The current Draft EIS is not a project action EIS, since the actual project is hardly defined at all; it is more in the nature of an early programmatic EIS, which anticipates the need for additional future SEPA review. While it may be appropriate to make large-scale decisions about corridor alignment through this EIS process, future decisions about construction methodology, street closures, final station entrance locations and their design, should require future SEPA review when facts and information are available to allow that review to occur adequately.
- In circumstances like this one, where information critical to evaluation of environmental impacts is not available, phased SEPA review is appropriate, as noted above. Pending future phased review, however, SEPA also requires the agency to conduct a worst-case analysis. But far from conducting a worst-case analysis, the Draft EIS does not even attempt to characterize actual impacts from street closures, surface construction and staging areas or other construction impacts.

For these reasons, we suggest that Sound Transit prepare a supplemental Draft EIS to respond to all of these unanswered questions. We appreciate the opportunity to provide these comments.

Sincerely,



Martha Barkman
Senior Vice President
Mack Real Estate Development

MACK | REAL ESTATE GROUP
1008 Western Avenue #201
Seattle, WA 98104
206 753 2414 telephone
206 793 2121 cell
mbarkman@mackregroup.com



MAK Management LLC
3213 W. Wheeler St. #159
Seattle, WA 98199
(206) 420-7236
MAK@MAKAssets.com

April 27, 2022

Via email: WSBLEDEIScomments@soundtransit.org

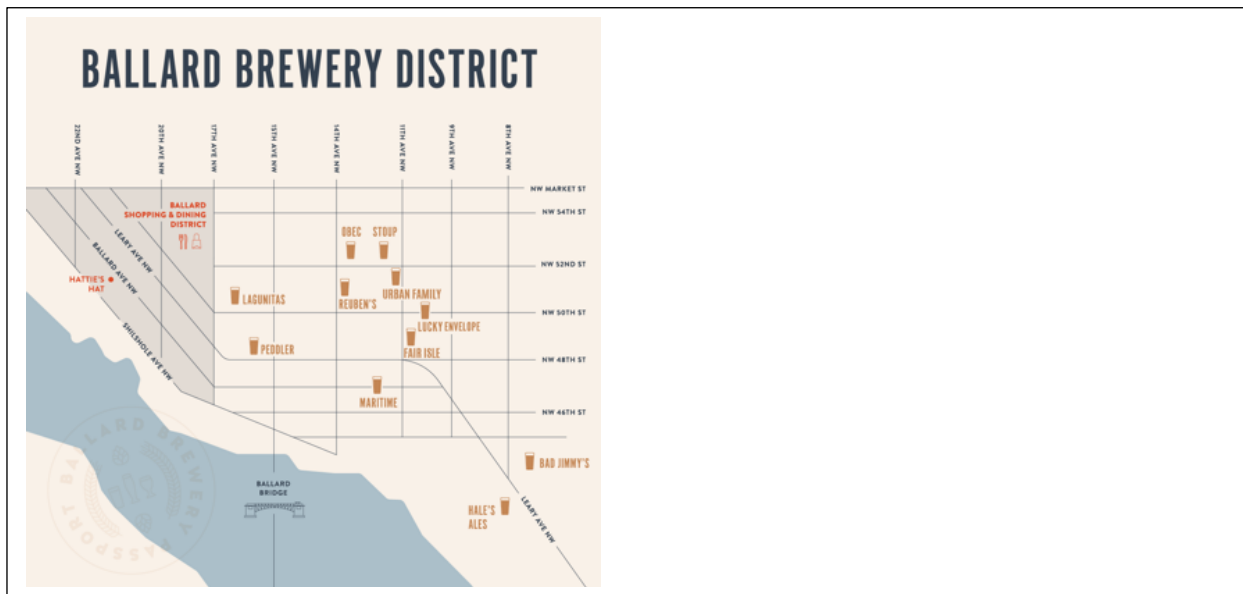
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

RE: West Seattle and Ballard Link Extensions Draft Environmental Impact Statement
Comments

Sound Transit Board of Directors:

Thank you for the opportunity to comment on the WSBLINK Extension. MAK is a local family-owned business that owns several properties in Seattle's industrial zones in the Ballard/Interbay/Magnolia areas. MAK's business plan is to improve existing in-city industrial buildings with a long-term investment horizon and a neighborhood improvement focus, to provide excellent, modern spaces for small to medium sized light industrial businesses. MAK has been instrumental in building out and leasing space to many small businesses in East Ballard as well as breweries within the nationally recognized East Ballard Brewery District.¹ The East Ballard Brewery District is a meaningful local amenity and strongly supported craft industry providing jobs and renowned product. The jobs provided by the Brewery district are industrial jobs that must be preserved. We advocate, in the strongest possible terms, for Sound Transit and its partners to construct light rail with means and methods to minimize disruption to the Brewery District.

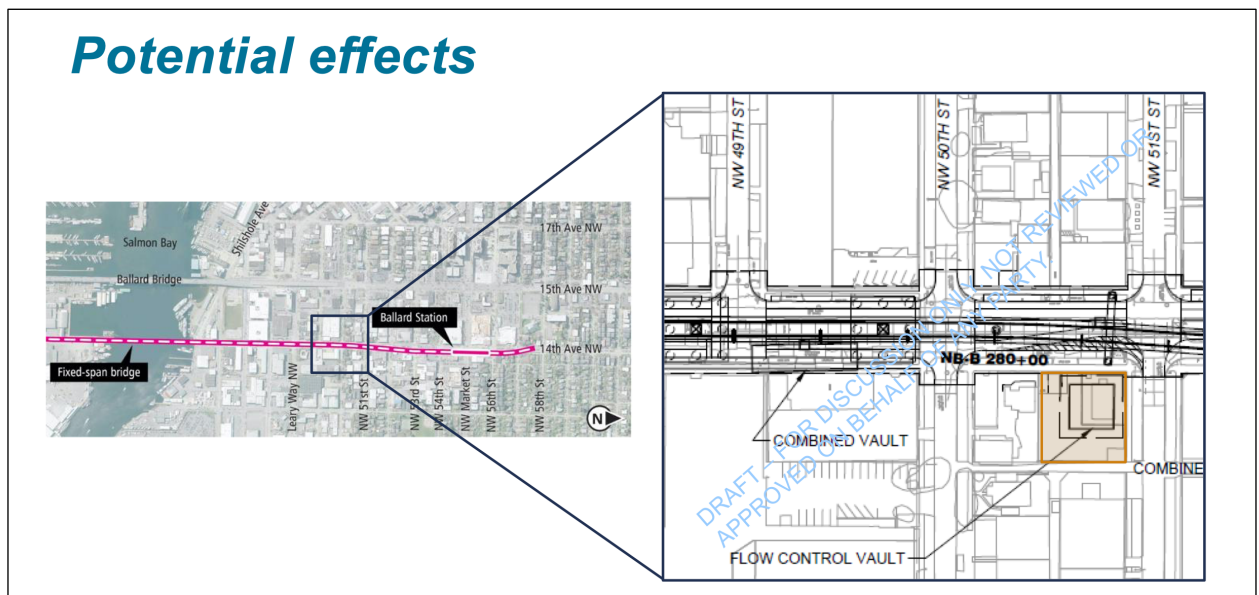
¹ <https://www.seattletimes.com/life/food-drink/a-popular-brewery-expands-in-ballard-with-more-big-names-coming/>



MAK and our brewery partners are concerned that the analysis in the Sound Transit DEIS does not consider the impact of the Ballard light rail link alignment on East Ballard breweries, nor recognized the importance of Brewery business continuity throughout the light rail construction. The brewery district is also not considered in the planning of construction activities, the impacts, and mitigation. There are several very problematic impacts from Sound Transit's proposed Ballard station locations on the brewery industries.

- **Elevated rail, and any 14th Ave NW alignment would negatively impact the Brewery District (and other small businesses) in many significant ways.**
 - a. **The DEIS does not acknowledge or study the critical ongoing transportation role of 14th Ave NW for the Ballard Brewery District and the businesses of East Ballard.** This includes freight movement, sales vehicles, through traffic, logistics for brewing beer (forklifts), making deliveries, receiving raw materials from large trucks (back-end loading and side loading), construction vehicles, and parking for patrons.
 - b. **The DEIS does present and analysis or disclose the construction impacts on the Ballard beer industry specifically.** This includes, but isn't limited to, construction noise and debris, truck traffic, closed and re-routed streets (both for customers and for deliveries/logistics), re-routed bus lines/stops, temporary way finding signage, construction site security. Over the weekends, the East Ballard industrial area is host to thousands of walking and biking pedestrians frequenting the taprooms and outdoor beer gardens. The forecasted construction closures, noise, dust, etc along 14th Ave NW, 52nd and 54th would likely put many breweries out of business. The duration of construction phases and activities is not adequately described and would affect the ability of businesses to survive. The details of how adjacent streets would manage additional traffic and how open the will be needs to be understood as well, for example 53rd.

- c. **We, specifically, object to the taking of 5010-5014 14th Ave NW, 98107 as a Flow Control Vault in 14th Ave NW Alignment OPTION- IBB-1b.** Reuben's Brews flagship taproom and its beer garden are instrumental and a founding organization in the Ballard Beer District. A Flow Control Vault seems a very unimportant and easily relocated piece of infrastructure relative to the essential role Reuben's taproom play in the district and for the proprietors. We request alternative locations be evaluated for this Flow Control Vault and request a letter or release stating as such in the immediate near term, rather than leaving landlord and tenant in limbo until 2027 or beyond.



- d. **We object to the lack of specific or planned communication with beer industry owners and leaders.** With the prolonged acquisition and relocation timeline, breweries impacted by potential “takings”, permanent and during construction, will be unable to make decisions to make near term investments in equipment, improvements, leases/space. Investments already have significant uncertainty from City permit timelines. After significant change from COVID and looming Land Use changes from the city, more uncertainty with station location and construction interruption could be more than the Ballard Beer District should or can sustain. We request to be notified when alignments are no longer in consideration.

Acquisition and relocation timeline



Pre-DEIS release (Fall 2021)

Sound Transit **contacts potentially affected property owners**



DEIS release (Early 2022)

Sound Transit Board **confirms or modifies preferred alternative**



Final EIS release (2023)

Sound Transit Board **selects project to be built**



Final design (2023-2027)*

- Sound Transit **identifies property rights needed to construct, operate and maintain the system**
- Sound Transit Board **authorizes property acquisition**
- Sound Transit will **prepare an appraisal** to determine fair market value of property needed for the project
- Sound Transit will provide **relocation assistance** to people and businesses displaced by the project, including referrals to comparable properties and payment of moving costs
- Sound Transit **staff are available to support property owners and tenants** through this process

- e. **Chapter 5 Cumulative Impacts and Appendix K, Present and Future Development, Transportation, and Public Works Projects in the Study Area, are missing *Seattle Industrial & Maritime Strategy Council Recommendations and the DEIS*.** Sound Transit failed to coordinate with the City's ongoing Industrial Land rezoning that will significantly impact the businesses and landlords of East Ballard. The lack of communication between Sound Transit and The City regarding Land Use in Ballard and the Station location has left businesses and landlords confused as to the future of Ballard industrial lands. The multi-year effort of the *Seattle Industrial & Maritime Strategy* is a reasonably foreseeable future action that should be presented in Chapter 5.

MAK advocates for and requests the following:

- **Preferred Tunnel 15th Avenue Station Option (IBB-2b), please locate the Ballard Station on 15th Ave NW, underground.** We advocate for 15th Ave NW over 14th Ave NW. We could likely be convinced 17th Ave NW is the best alternative with strong connection to East Ballard (pedestrian bridge). Maintaining mobility and pedestrian safety at intersections impacted by the Ballard station options is critical to a strong connection between the station and East Ballard.
- **Underground alignment, specifically.** Below ground track/rail and station are critical to minimize surface transportation disruption and/or change in neighborhood scale, blocking of sun, rerouting other transportation (cars, busses, freight).
- **Design pedestrian connectivity between East and West Ballard.** We would support the underground rail and station alternatives and could support the 15th Ave NW alignment, or even further west, with strong pedestrian connectivity between the station and East Ballard, provides the best protection for the future of Ballard Beer District.
- **Bus and rail to bus transfer volumes.** It is unclear if the volume of riders transferring to/from light rail have been quantified and their impacts disclosed. A large number of riders

transferring from light rail to bus would increase the space requirements on 14th Ave NW sidewalks and the space requirements for riders waiting for the bus. The lack of quantified rider transfers and their impact make it unclear if the design drawings in Appendix J are adequate or if the footprint would be increased with further design.

- **Construction staging areas.** It is unclear if the station area footprint includes all the needs for construction staging. The DEIS document, including Appendix J should call out construction staging.
- **Specific planning and communication with Ballard Beer District.** Sound Transit should communicate early and often with Ballard brewery industries to minimize uncertainty for businesses making decisions to invest in their spaces and businesses. Businesses cannot sustain a holding pattern until 2027 or beyond and maintain a vibrant beer district.
- **Specific construction mitigation planning to make beer gardens and all outdoor space used by the Ballard industrial neighborhood usable THROUGHOUT Sound Transit construction.** Ballard industrial is a flourishing business district with 24 hours of operations for many businesses, with deliveries at night to patrons at businesses during the day and weekends. Construction mitigation plans will be critical to maintaining this working pattern. The mitigation presented in the DEIS is overly broad, simplistic, and does not address the needs of the Ballard Beer District.
- **Reduce the DEIS forecasted construction period street closures, both in number and duration along 14th and adjacent streets.** And provide more details of how streets open during construction will operate effectively for Ballard industrial, like NW 53rd St.
- **Utilize known Ballard brownfields rather than take operating businesses for locating Light Rail infrastructure.** Sound Transit should consider using local knowledge to select sites for construction activities with environmental impact for light rail infrastructure. There are many large Ballard properties that remain brownfields due to the liability for environmentally contaminated sites and their cleanup costs. These complexities are difficult for the private investor to tackle. Sound Transit investment would activate currently underutilized sites while preserving active properties and businesses that have been purchased and redeveloped by the private industry.

Conclusion

We request that our above stated concerns be addressed in the context of the DEIS existing conditions, impacts, and mitigation for each of the elements of the environment.

We encourage Sound Transit staff to learn and understand the unique investment and operating characteristics of the Ballard Brewery District. Feel free to contact MAK for a tour of East Ballard as Sound Transit addresses each of our concerns.

MARTIN SMITH INC

April 27, 2022
via. Email

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

Re: Comments of Martin Smith Inc on the Draft West Seattle and Ballard Link Extension (WSBLE) project draft Environmental Impact Statement (EIS)

Dear Ms. Swift:

Thank you for considering our comments on the WSBLE draft EIS. Martin Smith Inc and our affiliates own and operate a portfolio of office and retail properties in downtown Seattle, with several of our buildings located within the Pioneer Square Historic District. The alternatives for the Chinatown-International District (“C-ID”) segment will be within the boundaries of the Pioneer Square Historic District or directly abutting it. Impacts from the station and track alignment will directly affect our properties and the fragile Historic Districts of both Pioneer Square and the C-ID. Construction of all alternatives will have significant adverse impacts on Pioneer Square, yet the EIS does not discuss impacts to our neighborhood. We have been working closely with our partners at Alliance for Pioneer Square and we echo the comments, issues, and mitigation ideas suggested in their EIS comment letter.

We believe Sound Transit should study the Fourth Avenue shallow station (CID-1a) alternative further. We believe this alternative meets more of the regional long-term transit needs than the other alternatives. In addition, further study can help to reduce impacts to transit and traffic, seek to shorten construction duration, and reduce costs. This alternative would center the new light rail station within the existing transportation hub, closer to more existing transportation, transit, and event facilities, offering greater opportunity for connectivity and infrastructure development that benefits the whole Puget Sound region, not just Seattle.

We request that Sound Transit communicate any alternative development studies and findings as soon as possible, and well before any formal NEPA or other environmental documents are published.

We look forward to working with the Sound Transit Board of Directors, Sound Transit, our City of Seattle officials, and Alliance for Pioneer Square to inform the decision to select the right preferred alternative for this once-in-a-generation regional project.

Sincerely,

A handwritten signature in black ink, appearing to read 'RS' or 'AS', with a horizontal line crossing through the middle of the letters.

Ryan Smith
President
Martin Smith Inc



McDonald's USA, LLC
Walnut Creek Field Office
2999 Oak Road, Suite 900
Walnut Creek, CA 94597
(925) 949-4000
Fax: (925) 949-4100

March 3, 2022

West Seattle and Ballard Link Extension
Sound Transit Community Outreach
Via email: wsblink@soundtransit.org

RE: West Seattle and Ballard Link Extension – Response to Draft EIS
Impact to McDonald's restaurant, 5400 14th Ave NW, Seattle, WA 98107
McDonald's Location ID #46-0006

To whom it may concern,

McDonald's Corporation is the owner of real property located at 5400 14th Ave NW, Seattle, Washington ("Ballard location"), franchised and operated by Mr. David Santillanes. This location has been operated since 1962 and is one of the first restaurants opened in the Pacific Northwest that is still operating today.

As a longstanding restaurant in this neighborhood, this location is very valuable to McDonald's and Mr. Santillanes. The property has benefitted from several financial investments over its life, the most recent being a multi-million-dollar investment by Mr. Santillanes and McDonald's Corporation to complete a major remodel project in 2020. The remodel project was not only to upgrade the kitchen and dining room but improve ADA access and sidewalk, as well as update the PlayPlace (to be enjoyed when it's safe to open it back up to the public).

As people may or may not know, over 90% of McDonald's restaurants are franchised using a format where McDonald's owns or leases the real estate, the franchisee owns and operates the business, and typically pays McDonald's a percentage of restaurant sales. Since McDonald's holds long-term interest in the real estate asset and shares in its profitability, it's in the company's best interest to maximize the real estate value and the store performance. As such, McDonald's invests a significant amount of money into the facilities and business operations and will take great strides in protecting those investments.

With the recent release of the Draft EIS, we understand there are several alternatives for the Ballard route and station, including elevated and at-grade options along 14th Ave NW and 15th Ave NW. Although it does not explicitly call out any impact to the McDonald's restaurant, we have concerns that any alternative on 14th Ave NW will negatively impact our restaurant. The locations of the at-grade station or support beams for an elevated station have the potential to permanently impact our drive-thru and restaurant's ingress and egress.

Being a business of convenience, McDonald's develops restaurants with great thought to the accessibility for drivers and pedestrians. Our drive-thrus have always been extremely valuable to our business but have proved to be very valuable to the community during COVID-19. With the increase in drive-thru restrictions in major metropolitan areas across the United States, protecting existing drive-thrus is very important to us.

With these concerns in mind, we would like to understand the impacts each 14th Ave NW alternative (IBB-1a, IBB-1b, and IBB-2a) might have to our restaurant, specifically if there are any permanent acquisitions required. If a 14th Ave alternative is chosen, what is the impact to vehicular access onto 14th Ave from east and west side streets, both permanent and temporary? Where, specifically, would a station at 14th & Market be located, and how do passengers enter and exit the station?

Given that the cost difference of a 14th or 15th Ave tunnel is not significant but comes with significantly fewer displacements for residents and businesses, has a tunnel alternative become a more desired option as third-party funding might not be required?

Without additional details on the impacts to our property, it is difficult to determine McDonald's preference for route and station location. Depending on impact, our restaurant could be an excellent partner to IBB-1a or IBB-2a, providing a well-lit business with extended operating hours. However, is there a scenario for IBB-1b or IBB-2b that allows the Safeway to remain operating? We would love to continue to serve this community and ask that we can work with the project team to further understand the extent of any impacts.

Thank you,



Eileen Baker

Real Estate Portfolio Manager

eileen.baker@us.mcd.com

425-588-8128

cc: David Santillanes
david.santillanes@partners.mcd.com

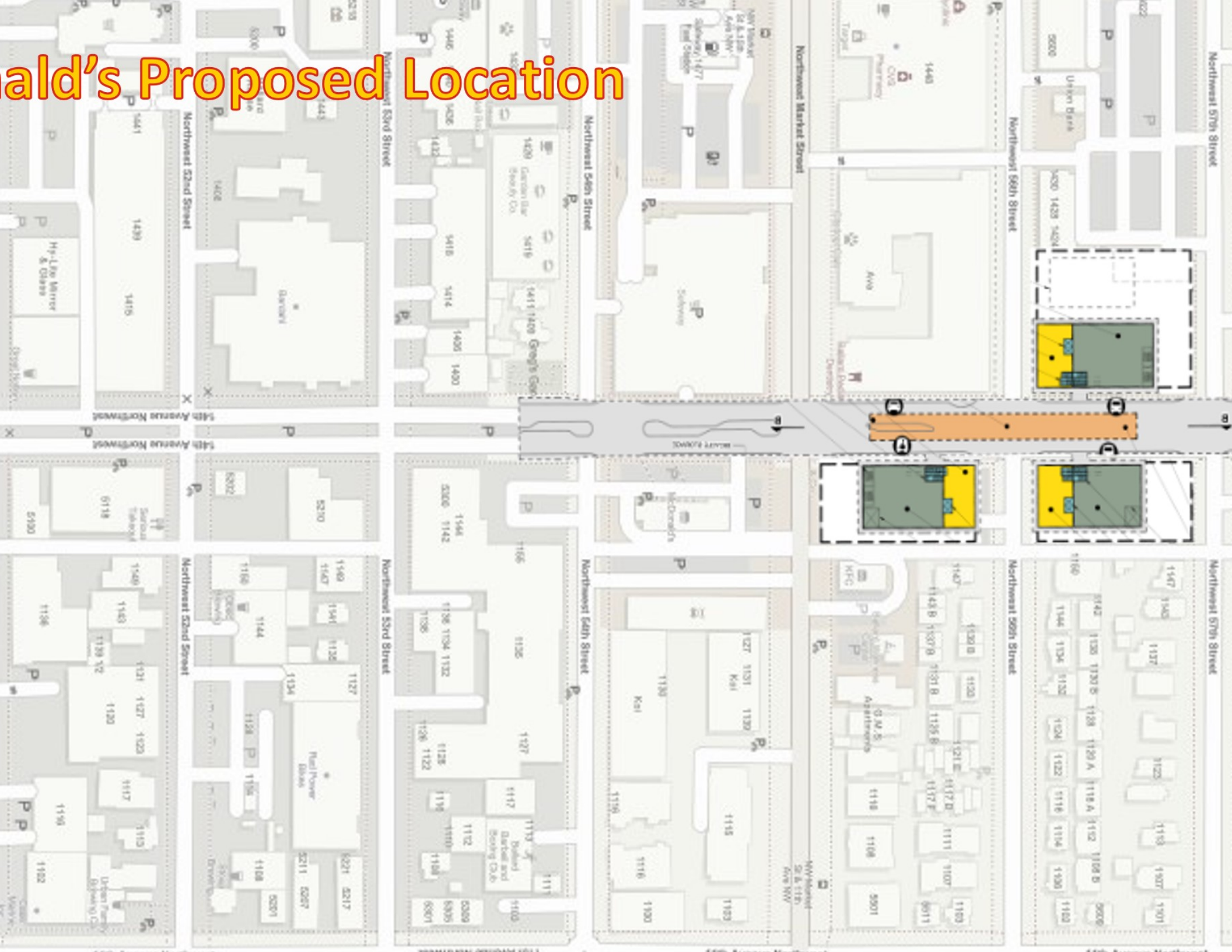
Sound Transit Projects

Details	Communication
#504649	Hello WSBLE team,
Date Recieved: 4/28/2022	The intent of this email is to officially state McDonald's Corporation's preference of preferred alternative for this station as an impacted property owner. To mitigate the complete loss of this community restaurant, we prefer the alternatives that run along 15th Ave (IBB-1b, IBB-2b or IBB-3).
Created by: Cecelia Gunn	However, if an alternative along 14th Ave is required, we urge SoundTransit to evaluate a new alternative that shifts the proposed location of the station currently outlined in IBB-1a and IBB-2a north one block to 14th Ave & 56th St as detailed by David below. This location not only mitigates the significant detriment to our property, but should also significantly reduce project costs as the properties have a much lower total assessed value by King County.
Audience: General Public	McDonald's wholeheartedly supports its franchisee at this restaurant, and will take all available efforts to protect his business and our real estate.
Reach:	Thank you,
Participation:	McDonald's Golden Arches logo
Engagement:	Eileen Baker
Source: Email	Real Estate Portfolio Manager, US Restaurant Development McDonald's USA, LLC 19215 SE 34th St 106 #124 Camas, WA 98607 Mobile: 425-588-8128 Email: eileen.baker@us.mcd.com
Assigned division: Outreach	
Category:	
Project Phase: Planning	
Project Segment:	
Environmental phase: Draft EIS	

Sound Transit Projects

Details	Communication
#504757	RE: West Seattle and Ballard Link Extension DEIS Comments
Date Recieved:	Impact to McDonald's restaurant, 5400 14thAve NW, Seattle, WA 98107
4/28/2022	Location ID #46-0006
Created by:	Dear Members of the Sound Transit West Seattle and Ballard Link Extension Project Team,
Nasra	I write to submit additional comments regarding the Ballard Light Link Extension.
Mohamed	While I believe a station location further West into Downtown Ballard will better serve riders and build upon the vibrant pedestrian neighborhood, if the agency is committed to its preferred alternative, I request you consider the schematic below which illustrates a reposition of the Market Street station.
Audience:	As you can see, by moving the station platform north one block it still maintains the accessibility while saving up to \$26 million in project costs.
General Public	The savings economics is derived by using the King County assessment rolls for the subject properties.
Reach:	Using King Co assessments, taking cost of the following sites under the current ST recommended site:
Participation:	McDonald's \$ 8 million
Engagement:	McD parking \$ 1.5
1	Safeway \$ 40.5
Source:	Safeway additional property \$ 1.5
Email	Parker paint \$ 4.8
Assigned division:	Total \$ 56.3 Million
Outreach	Using King Co assessments, taking cost of the following sites under my recommended site:
Category:	Ballard Market \$24.5 M
Project Phase:	Block 2
Planning	Bldg. 1 \$1.8
Project Segment:	Bldg. 2 \$1.2
Environmental phase:	Bldg. 3 \$.6
Draft EIS	Bldg. 4 \$.5
	Bldg. 5 \$.4
	Bldg. 6 \$.8
	Bldg. 7 \$.9
	Total \$ 30.7 Million
	This alternative allows me, a small business Hispanic franchisee of McDonalds to continue to provide service to the Ballard community. It allows us to continue to be the first job for many in our community and a career path for some.
	Respectfully submitted,
	M. David Santillanes, Jr.
	President,
	D. Lark, Inc.
	PO Box 70644
	Seattle, WA 98127

ald's Proposed Location



Sound Transit Projects

Details	Communication
#504835	April 26, 2022
Date Received: 4/26/2022	WSBLE Draft Environmental Impact Statement Comments c/o Lauren Swift Sound Transit 401 S. Jackson St. Seattle, WA 98104 Submitted via email to WSBLEDEIScomments@soundtransit.org Re: Mercer Stakeholder Comments on the Denny, South Lake Union, and Seattle Center/Uptown Stations — WSBLE Draft Environmental Impact Statement
Created by: Cecelia Gunn	Dear Ms. Swift,
Audience: Community Groups	The Mercer Corridor Stakeholders Group (Mercer Stakeholders) write you in response to the West Seattle and Ballard Link Extension (WSBLE) Draft Environmental Impact Statement (DEIS) with a particular focus on the Denny, South Lake Union, and Seattle Center/Uptown stations.
Reach:	The Mercer Stakeholders represent transportation interests on behalf of neighborhood organizations, non-profits, residents, major employers, and small business owners in the South Lake Union, Uptown, and Denny Triangle neighborhoods. Originally formed to shape the redesign of the Mercer corridor in 2006, Mercer
Participation:	Stakeholders have played an influential role in bringing together coalitions and acquiring federal grants for pivotal transportation projects that move people
Engagement:	through downtown Seattle and our region.
Source:	Since its inception, the Mercer Stakeholders have played an important role in shaping the alignment and advocating for the passage of Sound Transit 3 (ST3).
Assigned division: Outreach	Prior to the ballot initiative in 2016, a study conducted by the Mercer Stakeholders found that three north downtown stations (Denny, South Lake Union and Seattle Center/Uptown) were critical to support future density and growing transit ridership. The study estimated that planned developments would bring more than 60,000 jobs to north downtown— enough to fill more than eight Columbia Centers. Much of this growth has been realized and even more is on the way. The development of these light rail stations remains critical for meeting our region's collective goals for sustainability, equity, and economic prosperity.
Category:	
Project Phase: Planning	To realize the vision, we applaud the careful decision-making of regional leaders to ensure the most appropriate route alignment and station locations are selected, and that deliberate measures are taken to minimize construction impacts during the 11+ years of WSBLE construction. As such, the Mercer
Project Segment:	Stakeholders make the following comments regarding ST3 planning and the preferred alignment for the Denny, South Lake Union, and Seattle Center/Uptown station areas.
Environmental phase: Draft EIS	Denny Station Request: Study the alternative station location at Terry Avenue with a connection to the Harrison Street South Lake Union Station alignment and maintain Westlake Avenue operations during construction due to its function as the primary transit spine through South Lake Union. Provide a robust transit plan for any station alternative. The Denny Station must accommodate the growing residential population and employment base in north downtown while allowing the transportation and transit network to function during construction. South Lake Union is unique in that more employees in this neighborhood take transit to work than almost any other neighborhood in Seattle or the region. According to Commute Seattle, more than 67% of employees arrive at work by a means other than drive-alone trips. Many critical transit routes depend on Westlake Avenue, which has a dedicated transit lane and currently supports the South Lake Union Streetcar. The DEIS states that construction of the Denny Station at Westlake and Denny would fully close Westlake for four years and cause additional closures to bus corridors on Blanchard and Lenora. This simply is not viable. According to Table 4-39 of the DEIS Transportation Technical Report, portions of Westlake Avenue already operate at a Level of Service (LOS) F. If Westlake Avenue closes, this congestion will make traffic in the surrounding street network much worse. Also, because Denny Way is where the grid shifts, there are few continuous arterials that connect from south of Denny Way to north of Denny Way making it very difficult to effectively detour transit routes that now use Westlake Avenue N. What's more, closure of Westlake Avenue would halt the operations of the South Lake Union Streetcar, which connects Lake Union to downtown and soon further to Pioneer Square and First Hill. Pre-pandemic, the South Lake Union Streetcar carried more than 500,000 passengers per year. The DEIS does not identify any comparable detour routes nor transit mitigation measures. The DEIS notes that the South Lake Union Streetcar could potentially run in separate segments. This is not tenable, and any interruption would disrupt a major opportunity to mitigate the significant transit impacts of the WSBLE project. The Terry Avenue station location warrants serious consideration as it avoids the disruptions to the South Lake Union Streetcar and bus transit on Westlake Avenue and provides opportunity for an expansive light rail station with adequate pedestrian space. Table 4-42 of the DEIS Transportation Technical Report indicates the Terry Avenue station would generate the same ridership as the Westlake Avenue station for transit and pick-up/drop-off trips. The difference in number between "walk and bike" trips seems unlikely to differ significantly between the Denny Station alignments because they are relatively close to one another. This should be further analyzed in the Final Environmental Impact Statement. Additionally, the surrounding crosswalks and pedestrian facilities are noted as adequate for the Terry Avenue station location, while the Westlake Avenue and 9th Avenue intersection is expected to operate at a LOS F, indicating a better pedestrian experience at the Terry Station. (See pg. 6-40 and 6-41 of the DEIS Transportation Technical Report.) If the Westlake Avenue station location is carried forward for consideration, Sound Transit must go back to the drawing board and study alternative construction methodologies that minimize closures to Westlake Avenue and provide commensurate transit routes and traffic detour alternatives. Comment 1: To advance the Denny Station, Sound Transit must: a. Study a mix-and-match approach that considers the Terry Avenue station as part of the preferred alignment, connecting to the Harrison Street station. b. Study alternative construction methodologies that minimize impacts to Westlake Avenue and Denny Way. c. Prepare a detailed transportation mitigation plan that provides commensurate transit capacity and vehicle throughput in lieu of any closed corridors. d. Prepare a business access plan that minimizes construction impacts to loading docks, parking garage entrances, and building entrances. e. Build new streetcar tracks before ST3 construction commences to eliminate any operational disruptions to the South Lake Union streetcar and avoids impacts to the future Center City Connector. South Lake Union Station Request: Advance the Harrison Street station by exploring alternative construction approaches that limit closures. Analyze adequate traffic needs and prepare a robust mitigation strategy that includes expanding capacity on adjacent corridors like Denny Way and John Street. The South Lake Union Station must serve the heart of the neighborhood and provide critical transit connections between the Harrison transit corridor and north-south bus routes on 7th Avenue (SR 99 ramp connections) as well as Dexter and 5th Avenues. The alternative station location on Mercer Street is outside of

Details	Communication
	<p>neighborhood boundaries and located farther from major transit routes. The Mercer Street station is isolated from the South Lake Union neighborhood by both Mercer Street and SR 99, making it a dangerous and inconvenient location for pedestrians and transit riders. Additionally, as noted in Table 4-35 of the DEIS Transportation Technical Report, Mercer Street has an average daily traffic volume of 18,100 to 35,000 trips. The Mercer Stakeholders group strongly opposes even a partial closure of Mercer Street. The recent investments in this corridor are too important, and we do not support a Mercer Street station in South Lake Union.</p> <p>Comment 2: To advance the South Lake Union Station at Harrison Street, Sound Transit must:</p> <ol style="list-style-type: none"> Study alternative construction mitigation techniques that minimize the geographic footprint of construction and minimizes road closures. Prepare a robust detour plan with adequate detour routes on Denny and John Street, that provide commensurate access to SR 99. Maintain open sidewalks and a comprehensive pedestrian access plan through the construction area. Prepare a business access plan that minimizes construction impacts to small business, customer-facing businesses, loading docks, and building entrances. Prepare a comprehensive study of Harrison Street and final design that better connects pedestrians and vehicles across SR 99 and along the entire corridor from 5th Avenue to Westlake Avenue. <p>Seattle Center/Uptown Station</p> <p>Request: Study alternatives to the Republican Street station location and a mix-and-match approach that connects to the South Lake Union Station at Harrison Street. Avoid impacts to Mercer Street.</p> <p>The Seattle Center/Uptown Station must serve the Uptown neighborhood, the arts and culture organizations of Seattle Center, as well as the 12 million patrons of Seattle Center events and activities without causing irreparable harm to the organizations that exist today. These organizations have raised strong concern that the construction activities, including impacts from noise and vibration, threaten their existence.</p> <p>Sound Transit must consider other station locations that are not immediately adjacent to the Seattle Center's Northwest Rooms (Republican Street) or Seattle Rep. A Seattle Center/Uptown Station must also not extract land from Seattle Center, which is otherwise used for events, cultural celebrations, and recreation. Alternative station locations must avoid significant impacts to Mercer Street operations and connect back to the preferred alignment and the Harrison Street station.</p> <p>Comment 3: To advance the Seattle Center/Uptown Station, Sound Transit must:</p> <ol style="list-style-type: none"> Study alternative station locations that minimize impacts to Seattle Center grounds and organizations and connect to the preferred alignment at Harrison Street station. Study the impacts of specific construction activities on the unique and vulnerable uses at Seattle Center. Propose adequate noise and vibration mitigation. Prepare and execute a robust marketing strategy that attracts visitors to Seattle Center organizations and businesses during construction. Analyze adequate detour routes and prepare a detailed access plan specific to Seattle Center that considers traffic mitigation and maintains transit ridership and access during the years of construction. Study alternative construction mitigation techniques that minimize the geographic footprint of construction and minimizes road closures. Prepare a robust detour plan with adequate detour routes on Mercer, Queen Anne Avenue and 1st Ave N, which are heavily trafficked streets for residents of both Queen Anne and Uptown. Ensure the above streets have adequate access for the large amount of traffic flowing in both directions and several lanes. Maintain open sidewalks and a comprehensive pedestrian access plan through the construction area throughout the construction period. Prepare a business access plan that minimizes construction impacts to all businesses, customer-facing businesses, loading docks, and building entrances. Prepare a comprehensive study of all three streets and develop a final design that better connects pedestrians and vehicles along this stretch from Queen Anne Avenue to Seattle Center and along Mercer Street. <p>Additional Information & DEIS Inadequacies</p> <p>The Mercer Stakeholders appreciate the extensive research conducted by Sound Transit, the City of Seattle, King County Metro, and other partner agencies as part of the WSBLE DEIS. However, more information is necessary to understand the true impacts of WSBLE construction:</p> <p>Comment 4 - Road Closures & Detours: The DEIS provides some information pertaining to road closures but the analysis leaves out information about most closures less than one year (See Section 3, Table 3-30). In addition, detour routes are suggested for some closures, but not others. The full network of road closures, detours, and durations must be analyzed. It is improper to ignore closures of shorter durations and study each segment in a silo. The DEIS also does not analyze the full traffic volumes and patterns that must be mitigated as part of the decade-long construction window, nor does it analyze capacity and impacts during surge events. This information is necessary to understand the full impacts during construction and to prepare plans for mitigation.</p> <p>Comment 5 - Construction Methodology: The DEIS proposes only one construction technique (cut-and-cover) for each station in north downtown. It is unclear how specific methodologies were selected and why, or if other less impactful construction means may be possible. Sound Transit should study the possibility of constructing the Denny, South Lake Union, and Seattle Center/Uptown stations via means other than cut-and-cover and weigh the trade-offs with alternative approaches. This may include consideration of mined stations and other creative approaches.</p> <p>Comment 6 - Pedestrian Impacts: The DEIS analysis for pedestrian impacts is lacking across all segments. Pg. 6-47 of the DEIS Transportation Technical Report notes that "the Ballard Link Extension Build Alternatives could close sidewalks or reduce the sidewalk width within the construction areas along the impacted roadways...", however, the DEIS does not contain any detailed information about the location or duration of sidewalk closures. This analysis must be included in the Final Environmental Impact Statement. Information about sidewalk closures is critical to evaluate the impacts of different alternatives and provides critical data necessary to inform the analysis of anticipated business displacements.</p> <p>Comment 7 - Construction Sequencing: The DEIS identifies an 11-year construction window, but it does not specify the timing for each station or concurrent construction activities. Before finalizing the alignment, Sound Transit should study and disclose the estimated construction sequencing to better understand the impacts of WSBLE construction.</p> <p>Comment 8 - Cumulative Impacts: The DEIS appears to study construction impacts and road closures in isolation from one another. These construction plans must be studied as concurrent actions in order to understand the cumulative impacts of construction and mitigate appropriately.</p> <p>Construction Management Planning</p> <p>Construction of the ST3 network in downtown Seattle will be the largest infrastructure project in Seattle's history. More work is needed to ensure that we maximize this opportunity to connect our region while minimizing the undue harm to communities, businesses, and our transportation network during the 11+ years of WSBLE construction. While construction activities may be temporary, their impacts may cause lasting harm. We believe we can build one of the largest</p>

Details	Communication
	<p>light rail expansion projects in the country while preserving the health and vibrancy of downtown Seattle, but more work is needed before finalizing the alignment and construction plans.</p> <p>Comment 9 - We request that Sound Transit and its partners prepare a detail construction management plan that includes:</p> <ul style="list-style-type: none"> • Establishing a Construction Coordination Committee for north downtown comprised of South Lake Union, Uptown, and Seattle Center representatives and working with the committee to develop a plan to minimize construction impacts. • Avoiding impacts to transit, especially fixed rail transit or bus service with no adequate detour route. Providing additional transit service in areas acutely impacted. • Providing assistance to employers that encourages and facilitates transit ridership. • Establishing requirements for maintaining access to venues and businesses in construction contract documents. • Developing a communications plan to inform patrons, businesses, employees, and local residents of alternative route options. Providing real-time and advance-notice information on traffic movement, detour routes, and access. • Providing mitigation measures for business impacted in Uptown. • Implementing public education measures and creative marketing ideas that promote access and attractiveness of venues and businesses. • Defining appropriate freight routes to accommodate large trucks and proactively communicating changes to street and route access. • Providing clear wayfinding signage to help pedestrians safely and effectively navigate construction. <p>We appreciate your commitment to this important endeavor and look forward to working together as we deliver the West Seattle and Ballard Link Extensions.</p> <p>Sincerely, Members of the Mercer Corridor Stakeholders Group</p> <p>Danah Abarr Executive Director SLU Chamber</p> <p>Howard Anderson Chair Denny Triangle Neighborhood Association</p> <p>Maria Barrientos Co-Chair Uptown Land Use Review Committee</p> <p>Cary Clark Partner- Owner Argosy Cruises</p> <p>Michael Cohen Managing Director Madison Marquette</p> <p>Jacqueline Dupuis Interim Executive Director SIFF Cinema SIFF international Film Festival SIFF Education</p> <p>Jim Falconer Co-Owner The Vance Corporation The Tower Building The Times Square Building Mercedes Fernandez Co-Chair Uptown Land Use Review Committee</p> <p>Deborah L. Frausto Deborah L. Frausto LLC 15-year Uptown resident/small business-owner</p> <p>Ian M. Goodhew Head of Government Relations, PNW Google</p> <p>Ada Healey Chief Real Estate Officer Vulcan LLC</p> <p>Jeffrey Herrmann Managing Director Seattle Rep</p> <p>Rick Hooper Chair Uptown Alliance</p> <p>Mark Houtchens Co-Owner The Vance Corporation The Tower Building The Times Square Building</p>

Details	Communication
	<p>Sara Lazkani Public Policy and Community Engagement Manager, Northwest Meta</p> <p>Alexis Lee Executive Director MUSEUM OF POP CULTURE Shawna McMahon President South Lake Union Community Council</p> <p>Neha Nariya Co-Founder Civic Hotel</p> <p>Chuck Nelson President & CEO WASHINGTON ATHLETIC CLUB</p> <p>Von Perkins Principal PCMCLLC</p> <p>Molly Schlobohm President/COO Argosy Cruises</p> <p>John Schoettler Vice President, Global Real Estate & Facilities Amazon</p> <p>Jon Scholes President and CEO Downtown Seattle Association</p> <p>John T. Slattery, PhD Vice Dean, Research and Graduate Education UW Medicine</p> <p>Rachel Smith President and CEO Seattle Metropolitan Chamber of Commerce</p> <p>Marjorie Thomas CFO Allen Institute</p> <p>Jane Zalutsky Executive Director Seattle Center Foundation</p>

Ninth and Lenora LLC
c/o GID
125 High Street, 27th Floor
Boston, MA 02210

April 28, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104
Email: WSBLEDEIScomments@soundtransit.org

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

I am writing to provide comments on the Draft EIS for the WSBLE project on behalf of Ninth and Lenora LLC, the owner of the 396-apartment unit mixed-use property located at 2101 9th Avenue (TPN 0660000545) known as Stratus.

We offer the following comments on the Draft EIS:

- The Draft EIS should include station entrance alternatives that do not require the levelling of city blocks. Alternatives that knit such entrances into the existing and future built environment exist around the world. There is no reason they cannot be employed in WSBLE.
- The proposed several-year closure of Westlake Avenue will impose extraordinary hardships on nearby businesses, residents and projects, including Stratus. The Draft EIS should explore alternatives to such a closure. Further, the planned closure of 9th Avenue north of Stratus, together with the Westlake Avenue closure, will isolate Stratus from the heart of Downtown. Alternatives to the 9th Avenue closure should also be explored.
- The isolation of Stratus will negatively impact our residents and the operations of Stratus. Furthermore, this isolation may lead to a deterioration in the quality of behavior at the street level and create new security issues for residents in the area. These impacts should be reviewed in the Draft EIS and mitigation proposed to address them.
- It appears that long-term construction staging and construction activities will occur immediately adjacent to Stratus on the north and west sides, and that public use of the nearby newly-constructed City park (to which affiliates of the owner of Stratus greatly contributed) will be lost for a decade. Its loss will negatively impact the public, our residents, and the attractiveness and usability of Stratus. Of course, the noise and vibration from the nearby construction will negatively impact our residents and Stratus. The Draft EIS must evaluate these impacts.

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
April 28, 2022

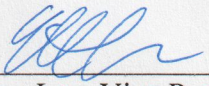
- The local impact of thousands of truck trips over many years, construction staging areas and displacement of neighborhood parking by construction workers will have substantial adverse effects on our community and its residents and our neighborhood.

Sound Transit should prepare a supplement to the Draft EIS that fully describes the WSBLE project and evaluates all impacts associated with the proposal.

We appreciate the opportunity to provide these comments.

Sincerely,

Ninth and Lenora LLC,
a Delaware limited liability company

By: 
Elton Lee, Vice President