Sound Transit Projects

Details	Communication
#504296	
Date Recieved:	Attached are the North Seattle Industrial Association's comments on the WSBLE Draft Environmental Impact Statement.
4/27/2022	Major Comments,
Created buy	I ne North Seattle industrial Association feels that the analysis was inadequate based on the various issues found in the attached document.
Created by:	The document did not look at all viable alternatives. The North Seattle Industrial Association advocated for an underground station at 17th and Market which
	Sound Transit refused to analyze. This is our preferred alternative and is the one that best fits the current City of Seattle Comprehensive Plan. We would like to see a supplemental EIS that includes this alternative
Audience.	
Reach:	Of the current alternatives in the DEIS, we favor the tunnel under the Lake Washington Ship Canal with a station at 15th and Market.
Farticipation.	Thanks.
Engagement.	The nurnese of this technical memorandum is to provide preliminary comments on the
Email	transportation and traffic analysis in the Sound Transit West Seattle to Ballard Link Extension
Assigned	(WSBLE) Draft Environmental Impact Statement (DEIS). These comments are prepared for the
division:	North Seattle Industrial Association (NSIA). The comments focus on the Ballard Extension
Outreach	tunnel alternatives and the alternative Ballard station locations per request of the NSIA.
Category:	In general, the DEIS lacks disclosure of relevant data. This lack of information and data limits
Project Phase:	the ability of the reader and impacted stakeholders to adequately comment on the project,
Planning	the impacts, and mitigation. A lack of information and data is inequitable to stakeholders and
Project Seament:	Chapter 1. Purpose and Need
West Seattle	1.2.1 Purpose of the WSBLE Project
and Ballard:	The purpose and need states over-arching goals such as, "The City desires to increase
Interbay/Ballard,	densities, create public spaces, and make transit and public services more convenient. The nurroose and need statement do not recognize the unique land uses in the
and Ballard:	Manufacturing/Industrial Centers (MICs) and city policy to protect these land uses.
SODO/Stadiums	Request: Add a purpose statement that speaks to protecting existing and planned land uses
Environmental	that are elements of the regional economy and the contribution to the regional economy.
phase:	appropriate analysis of those trips. Provide reference to the types of jobs and well-paving jobs
Draft EIS	that are unique economy of the MICs from the economic analysis.
	1.2.1 Need for the WSBLE Project
	1.2.2.1 Increasing Roadway Congestion will Further Degrade Transit Performance and Reliability
	Sound Transit West Seattle to Ballard Link Extension DEIS
	Transportation comments
	Transportation Consulting Services - 2 - April 2022
	Footnote 1 states that: "Puget Sound Regional Council acknowledges that the current
	pandemic may have effects on the economy that could alter long-range forecasts. Puget Sound Regional Council's payt regional forecast is anticipated no earlier than 2023. For the purposes
	of this Draft Environmental Impact Statement, the Puget Sound Regional Council's current
	forecasts are applied to the analysis." At this point in the pandemic, there are permanent
	changes to commute patterns that should be acknowledged and accounted for. Office
	current shifts to cubical "hoteling" by the private sector and government offices including
	Sound Transit and King County Metro. Such a shift in commute patterns significantly alters the
	travel demand forecasts. In addition, office workers will always have a choice as to whether a
	commute trip is made. Essential workers, industrial works, and other types of workers have
	Request: Use the revised regional forecasts expected in 2023 as the basis for WSBLE
	infrastructure decisions. The revised forecasts will affect the alternatives analysis for high capacity transit (HCT) mode choice. The revised forecasts should re-
	visit the choice of bus
	employment and establish the basis for those work trips that are a choice versus those work
	trips that are not a choice, and which work trips benefit versus those employment types that
	are impacted. Specifically, the land uses with employment in the SODO area are significantly
	impacted and the office-work jobs community between West Seattle and downtown are trips
	Chapter 3. Transportation Environment and Consequences
	Table 3-3 states that there will be 20,000 additional daily riders in 2042 with the Build
	alternative. Twenty thousand daily riders is not a large number of riders for a project of
	approximately \$12 billion dollars. Request: Revisit the project definition and consider scaling back to reallocate funding to
	develop the more beneficial segments and beneficial elements of stations.
	3.12.3.1 Transit Service and Facilities
	The sentence: "In general, bus service would be rerouted to serve the proposed light rail line
	the stations, consistent with Metro's service guidelines." is too general for the Ballard Stations
	which are the terminus of the Ballard Link extension. There will be a significant number of

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	transfers to bus transit which will require space for riders waiting at bus stops, expanded bus
	stops, and accommodation of high peak volumes of pedestrians at signalized intersections.
	Request: Prepare a complete mode of access/egress table for light rail passengers to/from bus
	transit, walk/bike, and dropotf/pick-up. Prepare pedestrian trip distribution and assignment
	Transportation comments
	Transportation comments
	Transportation Consulting Services - 3 - April 2022
	for riders transferring to/from buses and to/from neighborhood destinations, and their walk
	route. Prepare pedestrian LOS analysis along walk routes, in crosswalks, and holding areas
	where riders will wait to transfer to buses. Disclose space requirements and show necessary
	in the intersection LOS analysis. Disclose impacts and prepare mitigation.
	3.14.3.3 Permanent Removal of Parking
	There is no discussion of adjacent land uses where there is permanent loss of parking and loss
	of parking during construction. Businesses in the area may be dependent on these parking
	spaces.
	Request: Show locations of parking loss and adjacent land uses. Provide more specific
	Thiligation measures to support parking needs for businesses.
	For the sentence: "Preferred Alternative IBB-2a*, and Option IBB-1b would be provided on
	either side of 14th Avenue Northwest at signalized or controlled crossings. The signalized
	crossings, particularly on 15th Avenue Northwest or Northwest Market Street, would also be
	adjusted, as necessary, to account for increases in volumes to ensure pedestrians have
	sufficient time to cross the street."
	Request: Confirm if a pedestrian distribution and assignment were prepared, and pedestrian
	LOS analysis
	3.16.4 Mitigation for Operation Impacts
	The sentence: "The Ballard Link Extension project includes roadway, transit and pedestrian and
	bicyclist improvements and associated potential mitigation around the stations, including
	some grade-separated facilities to reduce conflicts, increase visibility between modes, and
	reduce congestion for the impacted modes." is not substantiated by the general mitigation
	statements in subsequent sections. The analysis does not disclose impacted modes.
	detailed mitigation measures. Ensure that the sentence, "Preferred Alternative IBB-2a* and
	Preferred Option IBB-2b* would not affect the truck or rail networks." is accurate, following
	the inclusion of estimated pedestrian volumes in crosswalks at intersections.
	3.18 - Freight Mobility and Access
	The reader should not have to look up the major truck streets in a separate referenced
	document. Sound Transit West Spattle to Ballard Link Extension DEIS
	Transportation comments
	Transportation Consulting Services - 4 - April 2022
	Request: Show in a figure or list major truck streets in the BINMIC.
	For the sentence, "None of the Ballard Link Extension alternatives would have long-term
	freight impacts that require mitigation during light rail operations." confirm if this is still
	accurate following intersection LOS analysis with pedestrian volumes and preparation of
	mitigation.
	Request: Revise the above sentence as necessary.
	3. IS Dallard Link Extension Construction Impacts Show the sequencing of construction activities should be shown in the DEIS. This is crucial
	information to stakeholders and businesses impacted by construction.
	Request: Prepare sequencing and duration of construction activities for alternatives. Evaluate
	impacts and duration of impacts. Prepare mitigation measures.
	The presentation of street closures does not address access to properties and the added
	circulation to access properties.
	Request: Show in maps and describe revised circulation and access for street closures.
	The study area, and construction analysis, do not address the needs of truck/freight mobility
	Truck access and mobility is a larger area than the study area. Analysis is needed that
	addresses truck movement in the area between the 0.5-mile study area radius and the
	regional analysis.
	Request: Expand the study area for truck/freight movements to and from major destinations
	by SODO businesses. Show detour routes for truck movements.
	3. 13. 1.3 Satety A sentence states " Sound Transit is proposing nedestrian and biowele improvements
	adjacent to the stations to ensure access is at signalize or controlled locations and, in some
	instances, grade-separated crossings." The pedestrian and bicycle improvements are not found
	in the DEIS.
	Request: Describe and/or show proposed pedestrian and bicycle improvements at the Ballard

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	stations.
	The following sentence, "Beyond the station improvements, increased non-motorized activity
	speeds." This claim may or may not be accurate depending on the context. To rely on driver
	Sound Transit West Seattle to Ballard Link Extension DEIS
	Transportation comments
	Transportation Consulting Services - 5 - April 2022
	expectations with increased activity is an outdated approach and inconsistent with the Safe
	System approach and Vision Zero plans.
	Request: Delete this sentence.
	conclusion that traffic volumes will be the same and therefore the number of crashes would be
	the same. This conclusion may or may not be accurate. The safety of a street is related to
	traffic volume and the mix of traffic including truck volume, posted and operating speeds,
	operations at intersections, driveways characteristics, lighting, lane widths, sidewalks, presence of bicycle facilities, and rail lines. A comparison of the relative safety of streets used
	for detours and during street closures should address these factors and their influence on
	safety.
	Request: Prepare a safety analysis of permanent conditions and conditions during construction
	tor street closures and of traffic shifted to other streets. For resources, refer to the Washington State Department of Ecology SEPA Checklist Guidance Section B: Transportation
	(https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-
	Environmental elements/Environmental-elements-14-Transportation) and that includes reference to the
	federal document, Integrating Road Safety into NEPA Analysis, A Practitioner's Primer, Federal
	Highway Administration (https://safety.thwa.dot.gov/tsp/thwasa113//thwasa113/.pdf) The City of Seattle Vision Zero plan is not sourced properly in the text
	Request: Source the Vision Zero plan.
	Chapter 4 Affected Environment and Environmental Consequences
	4.2.1 Acquisitions, Displacements, and Relocations
	The location of tables and maps of displaced properties is not clear to the reader. The title of Appendix L "Chapter 4 Supporting Information on Affected Environment and Environmental
	Impacts", does not reflect the content of Appendix L.
	Request: Revise the title of Appendix L as follows: "Acquisitions, Displacements, and
	Relocations". Revise the following reference as follows: Appendix L4.1, Acquisitions,
	Displacements, and Relocations, lists shows potentially affected parcels in tables and shows
	The business displaced, the nature of the businesses, the context of those businesses, and
	dependency on location are not provided in the text.
	Sound Transit West Seattle to Ballard Link Extension DEIS
	Transportation comments
	Transportation Consulting Services - 6 - April 2022
	Request: Provide text describing the types of businesses and their context such that the
	properties that would have changes in access and/or traffic circulation.
	Chapter 6. Alternatives Evaluation
	6.2.1 No Build Alternative
	This sentence: "Under the No Build Alternative, the WSBLE Project would not be built and there would be no new high-capacity transit in the project corridor" is not accurate. To state
	that there would be no new high-capacity transit misrepresents the high-capacity transit that
	could be built if the West Seattle and Ballard Link extensions, or segments of those extensions,
	are not built.
	of those extensions are not built
	Attachment N.1A Transportation Technical Analysis Methodology Report
	The effects of Covid on traditional downtown transit ridership are permanent. These effects
	include work-from-home as an option. One day per week of work-from-home by office
	traditional office workers have a choice, and essential workers including industrial and
	manufacturing workers do not have a choice. There are significant infrastructure investment
	decisions yet to be made by Sound Transit even after analysis of the current preferred
	alternative. These decisions should be made with revised forecasts reflecting a range of
	Request: Revise the methodology and forecasts to disclose the long-term effects of work-from home on the forecasts
	The study area, and subsequent analysis, do not address the needs of truck/freight movement.
	Truck access and mobility is a larger area than the study area. In addition, the narrow study
	area does not account for significant diverted traffic on roadways beyond the 0.5-mile study
	area. Request: Expand the study area for truck/freight movements to and from major destinations
	by SODO businesses. The following sentence is insufficient, "There could be some traffic
	circulation and property access changes after construction related to properties that have
	been fully or partially acquired during construction."

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Details	Communication
	Appendix N.1 Transportation Technical Report
	Note: Comments made on Chapter 3 of the DEIS chapters above, are also applicable to
	Appendix N.1 Transportation Technical Report. The comments on the transportation technical
	Sound Transit West Seattle to Ballard Link Extension DEIS
	I ransportation comments
	Transportation Consulting Services - 7 - April 2022
	report (TTR) below do not reflect a comprehensive review of the TTR because many comments
	that could be made on the TTR are captured in the chapters of the DEIS.
	3 Transit
	Table 3-22. Existing Transit Travel Times on RapidRide D Line (P.M. Peak Hour) – Ballard Link
	the percent difference. Chapter 3 only states the percent difference which masks the actual
	Request: Revise the text in Chapter 3 to include the actual travel time and the actual difference
	rather than the percent
	Page 39, the sentence states, "substantial number of transferring passengers would have to
	cross Northwest Market Street to access the westbound bus stops along Northwest Market
	Street." It is unclear what "substantial number" means and what are the impacts on
	Intrastructure capacity and intersection operations.
	without crossing a street, and the number of transfers on the sidewalks and crossing the
	streets.
	On page 4-114 changes to intersection operations are only described qualitatively.
	Request: Quantity the pedestrian along pedestrian routes to/from the light rail station,
	movements across streets, and the holding requirements at on-street bus stops. Verify that
	the pedestrian volumes at intersections are included in the LOS analysis or update the analysis
	with actual pedestrian volumes, vening it bus stop holding areas are adequate in size or need to be enlarged. Prenare mitigation measures, Show design changes in the Appendix 1 drawings
	In Table 4-61. Potentially Impacted Intersections to be Considered for Mitigation – Ballard Link
	Extension, does not include the light rail to bus transfer movements by riders. The text
	following this table should be specific as to what are the changes in intersection operations
	and specifically, the mitigation to reduce the impacts.
	Request: Add light rail to bus transfers as a cause of intersection impacts to be considered for
	6 Non-motorized Facilities
	The walksheds and bikesheds are not described in the Attachment N.1A Transportation
	Technical Analysis Methodology Report.
	Request: Revise the non-motorized methodology to eliminate walk sheds. A walkshed analysis
	is not an analysis of nonmotorized impacts and mitigation. Provide a description of a
	Transportation comments
	Transportation Consulting Services - 8 - April 2022
	methodology to evaluate walk routes and impacts on the walk routes by alternative for the
	SODO station. Figure 6-1 Existing Pedestrian Facilities West Seattle and Ballard Link Extensions – SODO
	Segment, does not show the inventory of pedestrian facilities within one-half mile of the
	station. There is no information presenting the results of the non-motorized evaluation
	measures as described in Attachment N.1A Transportation Technical Analysis Methodology
	Report.
	The discussion of increased pedestrian activity at the Ballard stations is qualitative. The reader
	Request: Present the p.m. peak hour pedestrian volumes estimated on the platform, the
	access/egress facilities, and the pedestrian facilities in the walkshed. Show in a table the p.m.
	peak hour pedestrian volumes uniquely identifying the transfers.
	Construction Mitigation
	I his section lacks sufficient detail for the complexity of the construction activities and their impacts. The proposed mitigation is inadequate for stakeholders to access access and mability.
	impacts, if mitigation rectifies the impact, and if there is permanent damage to businesses.
	Request: Prepare, describe, and show in figures the impacts of construction on the street
	system, to bus operations, and the displacement or access and circulation impacts to business
	in Ballard. Prepare construction mitigation measures to mitigate the impacts.
	The duration of construction activity is essentially a permanent condition for Ballard
	businesses. The impacts on streets and mobility for Ballard businesses have not been
	autressed. Short-term weekday closures can have a significant impaction industrial businesses and truck mobility. Closures of more than one week warrant detailed analysis of construction
	impacts to adequately understand the impacts and develop mitigation measures.
	Request: Prepare an impact analysis of closures during construction covering operations and
	safety for all modes affected by construction closures. Prepare infrastructure mitigation to
	address the operational and safety impacts.
	Early and trequent communication with property owners, street users, transit users,
	pedestrians, and Dicyclists Will be essential. Request: Include a description and commitment of the communication program as
1	r toquoot, morado a doponipation and commanion. Of the communication program as

Details	Communication
	construction mitigation. Include the types of communication, tools, frequency, stakeholder
	outreach, property owner outreach and communication, and a dedicated construction
	communication coordinator.
	Sound Transit West Seattle to Ballard Link Extension DEIS
	Transportation comments
	Transportation Consulting Services - 9 - April 2022
	Construction activities are extensive, each with impacts and mitigation. The construction
	mitigation should include a commitment to a construction management plan with outreach
	and input by stakeholders and include a Memorandum of Understanding with the SODO BIA
	for construction activities and mitigation.
	7 Safety
	This sentence, "Although pedestrian and bicyclist activity is expected to increase around
	stations, the increase in conflicts is relatively small compared to the number of conflicts
	already experienced within the dense and heavily used pedestrian and bicycle areas." Is
	inappropriate and inconsistent with the Vision Zero. There is no definition of "relatively small".
	A small increase is still an increase.
	Request: End the sentence at the first comma and delete the remainder of the sentence.
	Eugene Wasserman

Subject:	West Seattle to Ballard Link Extension DEIS Transportation comments
Date:	April 25, 2022
То:	Eugene Wasserman, Executive Director, North Seattle Industrial Association
From:	Claudia S. Hirschey, PE, RSP1
	Principal Traffic Engineer

TECHNICAL MEMORANDUM

The purpose of this technical memorandum is to provide preliminary comments on the transportation and traffic analysis in the Sound Transit West Seattle to Ballard Link Extension (WSBLE) Draft Environmental Impact Statement (DEIS). These comments are prepared for the North Seattle Industrial Association (NSIA). The comments focus on the Ballard Extension tunnel alternatives and the alternative Ballard station locations per request of the NSIA.

General

In general, the DEIS lacks disclosure of relevant data. This lack of information and data limits the ability of the reader and impacted stakeholders to adequately comment on the project, the impacts, and mitigation. A lack of information and data is inequitable to stakeholders and community groups with fewer resources.

Chapter 1. Purpose and Need

1.2.1 Purpose of the WSBLE Project

The purpose and need states over-arching goals such as, "The City desires to increase densities, create public spaces, and make transit and public services more convenient." The purpose and need statement do not recognize the unique land uses in the Manufacturing/Industrial Centers (MICs) and city policy to protect these land uses.

Request: Add a purpose statement that speaks to protecting existing and planned land uses that are elements of the regional economy and the contribution to the regional economy. Expand upon the unique trip-making patterns of the MICs in the transportation chapter with appropriate analysis of those trips. Provide reference to the types of jobs and well-paying jobs that are unique economy of the MICs from the economic analysis.

1.2.1 Need for the WSBLE Project

1.2.2.1 Increasing Roadway Congestion will Further Degrade Transit Performance and Reliability.

Footnote 1 states that: "Puget Sound Regional Council acknowledges that the current pandemic may have effects on the economy that could alter long-range forecasts. Puget Sound Regional Council's next regional forecast is anticipated no earlier than 2023. For the purposes of this Draft Environmental Impact Statement, the Puget Sound Regional Council's current forecasts are applied to the analysis." At this point in the pandemic, there are permanent changes to commute patterns that should be acknowledged and accounted for. Office workers will no longer commute to downtown Seattle five days per week. This is evidenced by current shifts to cubical "hoteling" by the private sector and government offices including Sound Transit and King County Metro. Such a shift in commute patterns significantly alters the travel demand forecasts. In addition, office workers will always have a choice as to whether a commute trip is made. Essential workers, industrial works, and other types of workers have different work schedules, home-to-work origins and destinations, and must travel to work.

Request: Use the revised regional forecasts expected in 2023 as the basis for WSBLE infrastructure decisions. The revised forecasts will affect the alternatives analysis for high-capacity transit (HCT) mode choice. The revised forecasts should re-visit the choice of bus versus rail to West Seattle. The revised forecasts should quantify the trip types by type of employment and establish the basis for those work trips that are a choice versus those work trips that are not a choice, and which work trips benefit versus those employment types that are impacted. Specifically, the land uses with employment in the SODO area are significantly impacted and the office-work jobs community between West Seattle and downtown are trips that are reduced, trips made by choice, and trips receiving the benefit of the WSBLE project.

Chapter 3. Transportation Environment and Consequences

Table 3-3 states that there will be 20,000 additional daily riders in 2042 with the Build alternative. Twenty thousand daily riders is not a large number of riders for a project of approximately \$12 billion dollars.

Request: Revisit the project definition and consider scaling back to reallocate funding to develop the more beneficial segments and beneficial elements of stations.

3.12.3.1 Transit Service and Facilities

The sentence: "In general, bus service would be rerouted to serve the proposed light rail line by removing duplicate service along the corridor and instead prioritize bringing bus riders to the stations, consistent with Metro's service guidelines." is too general for the Ballard Stations which are the terminus of the Ballard Link extension. There will be a significant number of transfers to bus transit which will require space for riders waiting at bus stops, expanded bus stops, and accommodation of high peak volumes of pedestrians at signalized intersections.

Request: Prepare a complete mode of access/egress table for light rail passengers to/from bus transit, walk/bike, and dropoff/pick-up. Prepare pedestrian trip distribution and assignment

for riders transferring to/from buses and to/from neighborhood destinations, and their walk route. Prepare pedestrian LOS analysis along walk routes, in crosswalks, and holding areas where riders will wait to transfer to buses. Disclose space requirements and show necessary expansion of bus stop waiting areas on drawing. Confirm that pedestrian volumes are included in the intersection LOS analysis. Disclose impacts and prepare mitigation.

3.14.3.3 Permanent Removal of Parking

There is no discussion of adjacent land uses where there is permanent loss of parking and loss of parking during construction. Businesses in the area may be dependent on these parking spaces.

Request: Show locations of parking loss and adjacent land uses. Provide more specific mitigation measures to support parking needs for businesses.

3.16.3.6 Interbay/Ballard Segment

For the sentence: "Preferred Alternative IBB-2a*, and Option IBB-1b would be provided on either side of 14th Avenue Northwest at signalized or controlled crossings. The signalized crossings, particularly on 15th Avenue Northwest or Northwest Market Street, would also be adjusted, as necessary, to account for increases in volumes to ensure pedestrians have sufficient time to cross the street."

Request: Confirm if a pedestrian distribution and assignment were prepared, and pedestrian volumes estimated at crosswalks in the intersection LOS analysis. If not, revise the intersection LOS analysis.

3.16.4 Mitigation for Operation Impacts

The sentence: "The Ballard Link Extension project includes roadway, transit and pedestrian and bicyclist improvements and associated potential mitigation around the stations, including some grade-separated facilities to reduce conflicts, increase visibility between modes, and reduce congestion for the impacted modes." is not substantiated by the general mitigation statements in subsequent sections. The analysis does not disclose "impacted modes".

Request: Prepare a more accurate statement of mitigation for operation impacts and/or more detailed mitigation measures. Ensure that the sentence, "Preferred Alternative IBB-2a* and Preferred Option IBB-2b* would not affect the truck or rail networks." is accurate, following the inclusion of estimated pedestrian volumes in crosswalks at intersections.

3.18 - Freight Mobility and Access

The reader should not have to look up the major truck streets in a separate referenced document.

Request: Show in a figure or list major truck streets in the BINMIC.

3.18.4 Mitigation for Operation Impacts

For the sentence, "None of the Ballard Link Extension alternatives would have long-term freight impacts that require mitigation during light rail operations." confirm if this is still accurate following intersection LOS analysis with pedestrian volumes and preparation of mitigation.

Request: Revise the above sentence as necessary.

3.19 Ballard Link Extension Construction Impacts

Show the sequencing of construction activities should be shown in the DEIS. This is crucial information to stakeholders and businesses impacted by construction.

Request: Prepare sequencing and duration of construction activities for alternatives. Evaluate impacts and duration of impacts. Prepare mitigation measures.

The presentation of street closures does not address access to properties and the added circulation to access properties.

Request: Show in maps and describe revised circulation and access for street closures. Describe mitigation measures.

The study area, and construction analysis, do not address the needs of truck/freight mobility. Truck access and mobility is a larger area than the study area. Analysis is needed that addresses truck movement in the area between the 0.5-mile study area radius and the regional analysis.

Request: Expand the study area for truck/freight movements to and from major destinations by SODO businesses. Show detour routes for truck movements.

3.19.1.5 Safety

A sentence states, "... Sound Transit is proposing pedestrian and bicycle improvements adjacent to the stations to ensure access is at signalize or controlled locations and, in some instances, grade-separated crossings." The pedestrian and bicycle improvements are not found in the DEIS.

Request: Describe and/or show proposed pedestrian and bicycle improvements at the Ballard stations.

The following sentence, "Beyond the station improvements, increased non-motorized activity can also improve driver expectations... and reduce collision severity because of reduced speeds." This claim may or may not be accurate depending on the context. To rely on driver

expectations with increased activity is an outdated approach and inconsistent with the Safe System approach and Vision Zero plans.

Request: Delete this sentence.

The effect of safety with the closure of streets is inaccurate. The qualitative analysis bases the conclusion that traffic volumes will be the same and therefore the number of crashes would be the same. This conclusion may or may not be accurate. The safety of a street is related to traffic volume and the mix of traffic including truck volume, posted and operating speeds, operations at intersections, driveways characteristics, lighting, lane widths, sidewalks, presence of bicycle facilities, and rail lines. A comparison of the relative safety of streets used for detours and during street closures should address these factors and their influence on safety.

Request: Prepare a safety analysis of permanent conditions and conditions during construction for street closures and of traffic shifted to other streets. For resources, refer to the Washington State Department of Ecology SEPA Checklist Guidance Section B: Transportation (https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPAguidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmentalelements/Environmental-elements-14-Transportation) and that includes reference to the federal document, *Integrating Road Safety into NEPA Analysis, A Practitioner's Primer, Federal Highway Administration* (https://safety.fhwa.dot.gov/tsp/fhwasa1137/fhwasa1137.pdf)

The City of Seattle Vision Zero plan is not sourced properly in the text.

Request: Source the Vision Zero plan.

Chapter 4 Affected Environment and Environmental Consequences

4.2.1 Acquisitions, Displacements, and Relocations

The location of tables and maps of displaced properties is not clear to the reader. The title of Appendix L "Chapter 4 Supporting Information on Affected Environment and Environmental Impacts", does not reflect the content of Appendix L.

Request: Revise the title of Appendix L as follows: "Acquisitions, Displacements, and Relocations". Revise the following reference as follows: Appendix L4.1,-Acquisitions, Displacements, and Relocations, <u>lists</u> shows potentially affected parcels in tables and shows the parcels in maps.

The business displaced, the nature of the businesses, the context of those businesses, and dependency on location are not provided in the text.

Request: Provide text describing the types of businesses and their context such that the stakeholders can understand the impact of displacements. Identify fully or partially acquired properties that would have changes in access and/or traffic circulation.

Chapter 6. Alternatives Evaluation

6.2.1 No Build Alternative

This sentence: "Under the No Build Alternative, the WSBLE Project would not be built and there would be no new high-capacity transit in the project corridor." is not accurate. To state that there would be no new high-capacity transit misrepresents the high-capacity transit that could be built if the West Seattle and Ballard Link extensions, or segments of those extensions, are not built.

Request: Revise this sentence to clarify what could be built if light rail extensions or segments of those extensions are not built.

Attachment N.1A Transportation Technical Analysis Methodology Report

The effects of Covid on traditional downtown transit ridership are permanent. These effects include work-from-home as an option. One day per week of work-from-home by office workers would be a 20% decrease in these types of trips. In addition, it should be noted that traditional office workers have a choice, and essential workers including industrial and manufacturing workers do not have a choice. There are significant infrastructure investment decisions yet to be made by Sound Transit even after analysis of the current preferred alternative. These decisions should be made with revised forecasts reflecting a range of commute conditions possible in the post-Covid scenario.

Request: Revise the methodology and forecasts to disclose the long-term effects of work-from-home on the forecasts.

The study area, and subsequent analysis, do not address the needs of truck/freight movement. Truck access and mobility is a larger area than the study area. In addition, the narrow study area does not account for significant diverted traffic on roadways beyond the 0.5-mile study area.

Request: Expand the study area for truck/freight movements to and from major destinations by SODO businesses. The following sentence is insufficient, "There could be some traffic circulation and property access changes after construction related to properties that have been fully or partially acquired during construction."

Appendix N.1 Transportation Technical Report

Note: Comments made on Chapter 3 of the DEIS chapters above, are also applicable to Appendix N.1 Transportation Technical Report. The comments on the transportation technical

report (TTR) below do not reflect a comprehensive review of the TTR because many comments that could be made on the TTR are captured in the chapters of the DEIS.

3 Transit

Table 3-22. Existing Transit Travel Times on RapidRide D Line (P.M. Peak Hour) – Ballard Link Extension, shows the actual travel times, unconstrained and additional due to congestion, and the percent difference. Chapter 3 only states the percent difference which masks the actual.

Request: Revise the text in Chapter 3 to include the actual travel time and the actual difference rather than the percent.

Page 39, the sentence states, "...substantial number of transferring passengers would have to cross Northwest Market Street to access the westbound bus stops along Northwest Market Street." It is unclear what "substantial number" means and what are the impacts on infrastructure capacity and intersection operations.

Request: Add the number of transfers, show the numbers of riders that transfer to bus transit without crossing a street, and the number of transfers on the sidewalks and crossing the streets.

On page 4-114 changes to intersection operations are only described qualitatively.

Request: Quantity the pedestrian along pedestrian routes to/from the light rail station, movements across streets, and the holding requirements at on-street bus stops. Verify that the pedestrian volumes at intersections are included in the LOS analysis or update the analysis with actual pedestrian volumes. Verify if bus stop holding areas are adequate in size or need to be enlarged. Prepare mitigation measures. Show design changes in the Appendix J drawings.

In Table 4-61. Potentially Impacted Intersections to be Considered for Mitigation – Ballard Link Extension, does not include the light rail to bus transfer movements by riders. The text following this table should be specific as to what are the changes in intersection operations and specifically, the mitigation to reduce the impacts.

Request: Add light rail to bus transfers as a cause of intersection impacts to be considered for mitigation. Describe the impacts in detail and the mitigation.

6 Non-motorized Facilities

The walksheds and bikesheds are not described in the Attachment N.1A Transportation Technical Analysis Methodology Report.

Request: Revise the non-motorized methodology to eliminate walk sheds. A walkshed analysis is not an analysis of nonmotorized impacts and mitigation. Provide a description of a

methodology to evaluate walk routes and impacts on the walk routes by alternative for the SODO station.

Figure 6-1 Existing Pedestrian Facilities West Seattle and Ballard Link Extensions – SODO Segment, does not show the inventory of pedestrian facilities within one-half mile of the station. There is no information presenting the results of the non-motorized evaluation measures as described in *Attachment N.1A Transportation Technical Analysis Methodology Report.*

The discussion of increased pedestrian activity at the Ballard stations is qualitative. The reader cannot verify that the high number of light rail to bus transfers are included in the analysis.

Request: Present the p.m. peak hour pedestrian volumes estimated on the platform, the access/egress facilities, and the pedestrian facilities in the walkshed. Show in a table the p.m. peak hour pedestrian volumes uniquely identifying the transfers.

Construction Mitigation

This section lacks sufficient detail for the complexity of the construction activities and their impacts. The proposed mitigation is inadequate for stakeholders to assess access and mobility impacts, if mitigation rectifies the impact, and if there is permanent damage to businesses.

Request: Prepare, describe, and show in figures the impacts of construction on the street system, to bus operations, and the displacement or access and circulation impacts to business in Ballard. Prepare construction mitigation measures to mitigate the impacts.

The duration of construction activity is essentially a permanent condition for Ballard businesses. The impacts on streets and mobility for Ballard businesses have not been addressed. Short-term weekday closures can have a significant impact on industrial businesses and truck mobility. Closures of more than one week warrant detailed analysis of construction impacts to adequately understand the impacts and develop mitigation measures.

Request: Prepare an impact analysis of closures during construction covering operations and safety for all modes affected by construction closures. Prepare infrastructure mitigation to address the operational and safety impacts.

Early and frequent communication with property owners, street users, transit users, pedestrians, and bicyclists will be essential.

Request: Include a description and commitment of the communication program as construction mitigation. Include the types of communication, tools, frequency, stakeholder outreach, property owner outreach and communication, and a dedicated construction communication coordinator.

Construction activities are extensive, each with impacts and mitigation. The construction mitigation should include a commitment to a construction management plan with outreach and input by stakeholders and include a Memorandum of Understanding with the SODO BIA for construction activities and mitigation.

7 Safety

This sentence, "Although pedestrian and bicyclist activity is expected to increase around stations, the increase in conflicts is relatively small compared to the number of conflicts already experienced within the dense and heavily used pedestrian and bicycle areas." Is inappropriate and inconsistent with the Vision Zero. There is no definition of "relatively small". A small increase is still an increase.

Request: End the sentence at the first comma and delete the remainder of the sentence.

Sound Transit Projects

Details	Communication
#503217	To whom it may concern,
From: I-Miun Liu Date Recieved: 4/28/2022	My name is I-Miun Liu, I am the owner of Oasis Tea Zone in Chinatown ID, one of the businesses that will be directly affected by the 5th Ave Chinatown station proposal. By affected, I mean demolished. Oasis has been part of the Chinatown community for over 20yrs and is the oldest Bubble tea shop in the region. We've spent thousands of volunteer hours, hundreds of thousands of dollars, and hundreds of partnerships with various groups and organizations over the 20yrs in supporting the Chinatown ID Neighborhood. And a neighborhood it truly is. This is not an industrial throughway or dying Chinatown you see in some other cities. We have real families, children, seniors, small businesses, organizations, and schools that have generations of history.
Created by: Audience: Reach: Participation: Engagement: Source: Online open house	My comment today is not a plea to save my businesses. It is really about the hypocrisy of the city and the disregard for our neighborhood once again. The state and government have time and time again chosen a more expensive and difficult path when it comes to every other policy in the city in the name of a greater good. From the plastic bag and straw bans, to reducing car lanes to increase bike lanes, to spending hundreds of millions a year to support the homeless community, and countless other city initiatives. But when it comes to the Chinatown ID community, cost and timelines all of the sudden become a critical component. Your budget and timeline goals, which we all know will not be met, will destroy a critical immigrant neighborhood and community in this region. Can you name another thriving International District in the Pacific NW? No, you cannot. Taking away multiple lots and redeveloping several blocks so the next generation of businesses can only operate under high overhead costs, will all lead to the exact gentrification the region claims to avoid. What this neighborhood needs is collaboration in finding a solution that meets the transportation needs but does not turn Chinatown into a modern tourist zoo. Chinatown ID is not a city attraction, it is a true neighborhood with real people who depend on it everyday.
Assigned division: Outreach	Have any of the Sound transit board been through a decade's plus long construction project in their neighborhood? Would they allow 10yrs+ of jackhammering and dump trucks driving through their streets where their children play? This is not a hard or emotional decision. It is clear and obvious based on the history of construction projects in this city. The city has an opportunity to stand up and take a possibly "harder" path to do what is right.
Category: Project Phase: Planning Project Segment: Environmental phase: Draft EIS	I ask that you really consider all the consequences that you will be imposing on a neighborhood for the next 100+yrs. Thank you, I-Miun Liu

Sound Transit Projects

Details	Communication
#504325 Date Recieved: 4/27/2022	Name: Ping Liu Address: 508 S King St. Seattle Phone: 206-623-6764
Created by: Tay Stone	The following is my opinion based on what I understand from the current project situation:
General Public	caused by the construction, please provide reasonable compensation.
Reach: 1	2. Suppose the 5th Ave option is chosen. As the building needs to be demolished, I will accept a negotiated one-time displacement fee.
Participation: 1 Engagement: 1	Signed. Ping Liu 4.27.2022
Source: Comment form	
Assigned division:	
Category: Project Phase: Planning Project	
Environmental phase: Draft EIS	

Urban Renaissance Group 1425 Fourth Avenue, Suite 200 Seattle, WA 98101 Phone 206.381.3344



April 28, 2022

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

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of BGO PLAZA 600 JV LLC, the owner of the Plaza 600 building located at 600 Stewart Street (TPN 0659000555) (the "Property") to provide comments on the Draft EIS for the WSBLE project.

The ownership in the last several years has undertaken millions of dollars of upgrades to the Plaza 600 building. We support the WSBLE project and the opportunity to expand light rail accessibility throughout Downtown. Expansion of the Westlake Station as the key hub for the entire regional light rail system will be a step forward.

However, there will be significant impacts associated with developing this underground light rail project through the middle of Downtown Seattle. These impacts will include long-term street closures on Pine Street, 4th Avenue, 6th Avenue and other streets in the proximity of the Property, closures that could last up to 6 years or more. In addition, construction for the expanded Westlake Station and new underground tunnel will occur under and/or immediately adjacent to the Property for many years.

We are concerned about the following impacts:

- <u>Congestion</u>. 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 in Downtown for years, posing challenges for Downtown employees and
 residents to reach their jobs and homes.
- <u>Noise</u>. Long-term construction noise will impact the functionality of the workspace in the building. Vibration effects from below-grade construction immediately beneath Plaza 600 will have similar effects.
- <u>Urban Design</u>. The current concepts for large, free-standing station house structures at Westlake Center, 5th & Pine and the Bank of America building 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.
- <u>Security</u>. The massive construction sites surrounding the Property for most of a decade, together with numerous street closures nearby, will deter pedestrian use and inevitably create an environment that promotes criminal and anti-social behaviors. Downtown already struggles with this issue, and we are concerned that the WSBLE project construction will consign this area of Downtown to many more years of continued blight. It is critical that Sound Transit provide security and invest mitigation resources in this neighborhood to ensure these impacts do not occur.

• <u>Redevelopment Impacts</u>. Construction of a tunnel beneath Plaza 600 will necessarily limit the future redevelopment options for the Property. Since WSBLE is a 100-year project or more, the Draft EIS should evaluate these impacts on the Property and the tunnel corridor generally Downtown.

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.

We appreciate the opportunity to provide these comments.

Sincerely,

am Jelu Shawn Jackson

Managing Director Urban Renaissance Group, LLC

cc: Jack McCullough jac k@mhseattle.com.

April 28, 2022

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

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of QA Canal LLC, which is the owner of the property located at 3837 13th Avenue West in Seattle, Washington (TPN 2770604865, 2770604870, and 2770604880 and collectively, the "Property") to provide comments on the Draft EIS for the South Transit West Seattle and Ballard Link Extension ("WSBLE") project ("DEIS"). QA Canal is actively planning for a development of the Property with multifamily housing and retail uses ("Project") and is proceeding towards submittal of the City of Seattle ("City") master use permit application.

The Property is along the Ballard/Interbay Segment of the WSBLE project. The Preferred Elevated 14th Avenue Alternative ("IBB-1a") and Elevated 14th Avenue from Prospect Street Station Alternative ("IBB-1b") appears to prevent the viable development of the Project and reduces the opportunities for new housing in Seattle – including new affordable housing through the payment or performance of the City's mandatory housing affordability requirements. For these reasons, QA Canal encourages Sound Transit to select a Ballard/Interbay tunnel option.

Our additional comments on the Draft EIS are as follows:

- The DEIS does not adequately describe the impacts, both temporary and permanent to the North Queen Anne neighborhood within the Ballard/Interbay Segment. 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;
 - o Scope of above-grade construction limits;
 - o Actual street closure locations and durations;
 - o 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 15th Avenue.

Due to the lack of adequate description of these impacts to North Queen Anne, the DEIS fails to characterize these impacts or identify and evaluate appropriate mitigation

measures. More detailed analysis of the IBB-1a and IBB-1b alternatives must be included for North Queen Anne, including the Property. Only after adequate analysis of these impacts can potential mitigation be adequately identified and discussed.

- 2. The IBB-1a and IBB-1b alternatives will include multiple street closures and other construction impacts in the vicinity of our Property and 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 DEIS. Sound Transit must complete that analysis and, only then may more specific mitigation measures for congestion and other construction impacts must be developed for IBB-1a and IBB-1b alternatives.
- 3. The DEIS does not adequately describe the affected environment and land use of the WSBLE alignment options in North Queen Anne, 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 and potential construction, land use, housing, and aesthetic impacts of the IBB-1a and IBB-1b alternatives. Sound Transit must update the baseline to produce an accurate assessment of likely impacts of the WSBLE project under the IBB-1a and IBB-1b alternatives, including the potential adverse impacts on housing availability, and identify potential mitigation measures.
- 4. 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 changes to the Ballard/Interbay Segment. While QA Canal supports the Ballard/Interbay Segment tunnel options, 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 the Ballard/Interbay Segment, Sound Transit must undergo supplemental environment review and provide additional comment opportunities for stakeholders to evaluate and respond to an informed analysis.

QA Canal supports the WSBLE project and believe it can be a long-lasting benefit to the City and region if it is properly planned, designed, and managed throughout the construction period.

Unfortunately, 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, adequately evaluates all impacts associated with the project and proposes reasonable mitigation measures.

We appreciate the opportunity to provide these comments.

Sincerely,

J.M. .

Sound Transit Projects

Details	Communication
#501641	The Preferred Alternative for the Ballard Link Extension proposes a Flow Control Vault at the location of 5010 14th Ave NW. The location of this vault would
From: Grace Robbings	require demolishing the building we rent, which would be devastating to our family business (Reuben's Brews, a local microbrewery) that has been operating at this location since 2015. Reuben's Brews (founded in 2012 at a smaller nearby location to the impacted property mentioned above) was the first brewery to operate in this quadrant of Ballard (east of 15th between Leary and Market), which is now dubbed the "Ballard Brewery District" led by the Ballard Brewed Coalition. It would be a sad twist of fate to demolish the brewery that arguably revitalized Ballard as a brewing neighborhood, a destination which attracts many
Date Recieved:	tourists to this part of the city, in order to replace it with the equivalent of a storm drain.
4/26/2022	Comment Based on Document: West Seattle and Ballard Link Extensions DEIS: Appendix J Conceptual Design Drawings – Index of Drawings and Legend (p. 121 of 151)
Created by:	DRAFT EIS - CONCEPTUAL DESIGN
Audience:	IN TERBAY/BALLARD SEGMENT BALLARD LINK EXTENSION
Reach:	PREFERRED ELEVATED 14TH AVENUE ALTERNATIVE (IBB-1a)
Participation:	L50-GSP110
Engagement: Source: Online open house	228 10/02/2020 L50 PLAN AND PROFILE https://www.soundtransit.org/sites/default/files/documents/10c-wsble-draffeis-appendivi-drawings-ballard-202201.pdf
Assigned division: Outreach	
Category:	
Project Phase : Planning	
Project Segment:	
Environmental phase: Draft EIS	

1001 Fourth Ave, Suite 500 Seattle, WA 98154

206.623.6936 www.bxp.com Boston Properties, Inc. (NYSE: BXP)



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

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

Boston We are writing on behalf of Boston Properties Limited Partnership, which is the owner of the property located at Safeco Plaza - 1001 4th Avenue (TPN 0942000300) (the "Property") to provide comments on the Draft EIS for the WSBLE project.

Los AngelesBoston Properties owns significant office assets in major metropolitan areas served
by light rail, and we recognize the great value of such high-capacity transit to urban
centers like Downtown Seattle. We support the WSBLE project and look forward to
the additional transit service it will offer Downtown.

Seattle We note, however, that the Draft EIS preliminarily identifies potential street closures in the vicinity of the Property. Some of these closures, such as to 4th Avenue, may be of long duration. We are concerned that these street closures will impact the accessibility, use and leasing of Safeco Plaza and other major buildings in the area. Congestion from long-term closures of 4th Avenue and other nearby streets will create significant congestion issues in and around this neighborhood.

We ask that the EIS better define the location, sequence and duration of these closures, and evaluate the effect of these street closures on the viability of access to Safeco Plaza and other major buildings in the vicinity. This nine-block area includes millions of square feet of office space and significant congestion impacts from street closures will have adverse impacts on Downtown.

We therefore ask that Sound Transit prepare 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 and look forward to a meeting together to better facilitate any street closures that will be required.

Sincerely,

Kelley Lovshin

Kelley E. Lovshin

Sound Transit Projects

Details	Communication
#501013	
From: Kaitlin Uemura	we are concerned with is the Chinatown/ID station (Page 15). As CID AAPI business owners we are concerned with is the Chinatown/ID station (Page 15). As CID AAPI business owners those 18-19 businesses mentioned in the project, it impacts the whole neighborhood. The International District is a small neighborhood and without those 18-19 businesses, how can Sound Transit expect any of the other businesses to thrive? During the pandemic of 2020 when many businesses were shut down, the ID
Date Recieved: 4/22/2022	suffered immensely. Problems like safety issues for residents (especially the elderly), break-ins & theft causing all businesses to board up, and anti Asian hate crimes on top of all of that. Our shop Sairen has been broken into 3 times within 1 year with broken glass and structural damages. We are finally recovering from the pandemic and do not want more damage to be done to our neighborhood, especially if it can be avoided. We are scared of watching all of these things unfold again if the city willingly chooses to close down the heart of ID.
Created by: Audience:	As CID businesses owners, we do not approve of any of the 5th plan options and ask Sound Transit to take 5th Ave S off of the table. 5th Ave Shallow, Diagonal and Deep should be taken out of consideration and shouldn't have been alternatives to begin with. The preferred route should be 4th Shallow or 4th Deep.
Participation: Engagement:	As CID business owners, we are demanding Sound Transit to keep our safety in mind. Not only poor air quality and environmental conditions, but also safety on the streets, especially at night. With closures and shutdowns we ask Sound Transit to be willing to support not only the businesses directly impacted but the paid businesses are used. Surrounding businesses that remain will auffer from degrades in businesses are defined as for the surrounding businesses.
Source: Online open	grants or allocations for security (exterior gates, glass security film, cameras) should be guaranteed as well.
house Assigned	Choosing to shut down 5th Ave S as opposed to 4th Ave S will cause many more Asian-owned businesses to go out of business than the 18-19 listed on the project. Leading to one final question: will the Chinatown-International District have any businesses left that are AAPI or minority owned businesses after Sound Transit's decision? If not, the city better name this area something else because it would be a shame.
Outreach	Sincerely,
Category:	Kaitlin Uemura & Kaitlin Madriaga
Project Phase: Planning	Business owners of Sairen, a local boutique featuring & supporting many AAPI local artists Shop Address: 600 S Jackson St, Seattle, WA 98104
Project Segment:	
Environmental phase: Draft EIS	

SBFP Corporation 1881 Bouslog Rd

Burlington, WA 98233

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 SBFP Corporation

Dear Ms. Swift,

This letter is submitted by SBFP Corporation ("**SBFP**") in response to the West Seattle and Ballard Link Extension (the "**WSBLE**") Draft Environmental Impact Statement ("**DEIS**") recently published by Sound Transit. We appreciate the opportunity to comment on the DEIS.

SBFP is a family enterprise owned by a group of siblings and their children who descend from the founders of the former Nelson Chevrolet. Though Nelson Chevrolet no longer operates, SBFP still own the former dealership property on two Ballard parcels at 1521 NW 50th Street and 4904 17th Ave. NW, also known by King County APNs 2767701830 and 2767701910 (together, the "**Property**"). In total, the Property has an area of approximately 85,366 sq. ft., and it is currently zoned IC-65 (M). Currently, the Property is leased to light industrial and brewery businesses (Dirt Exchange and Lagunitas) who actively serve local customers and the Ballard community.

The cousins of the SBFP are 6th generation Ballardites.¹ Our family has been actively engaged in Ballard's transportation infrastructure for more than 100 years, starting as Swedish immigrants in the 1890s, with ownership and management of a hotel, horses-for-hire and livery business based at the corner of Dock Place and Ballard Avenue.

More recently, our grandfather/great grandfather Stan Nelson Sr. opened a single Model-T jitney business in 1914 (providing 10-cent trips between Ballard and other parts of Seattle), followed by the first gas station north of the Ship Canal in 1916, and of course Nelson Chevrolet in 1922. The rest, as they say, is history.



Property of Museum of History & Industry, Seattle

WSBLE DEIS comments (Lagunitas and Dirt Exchange sites)

¹ A seventh generation has already been born in Ballard, but no members of that generation are direct shareholders in the SBFP at this time.

Building on past generations of family engagement in Ballard and the development of its transportation systems, we write to express our support for the WSBLE and to provide our comments on the DEIS. Specifically, we write to express our strong support for the tunnel alternatives (IBB-2a or 2b), strong opposition to the Elevated 15th Avenue Alternative (IBB-3), and our general request that the DEIS provide additional information and analyses.

1. The FEIS Must More Thoroughly Account For, Analyze and Mitigate Industrial and Maritime Impacts.

Sound Transit has identified the Property as likely subject to a taking for guideway infrastructure if Alternative IBB-3 is selected. This would be a sad occurrence for our family, which has had roots on the Property as well as Ballard's commercial, industrial and transportation community for generations. However, the shortcomings in the DEIS are not just about our family's Property. Nor are they just concerns for the Property's light industrial and brewery tenants and the many people who work for those tenants. Specifically, our concerns about Alternative IBB-3 relate to losses to industrial employment and maritime infrastructure that will hurt Ballard's economy and culture, have City-wide employment effects due to the already acute shortage of industrial space, and even have adverse impacts across state lines by potential unmitigated adverse effects to the Bering Sea fishing fleet that largely docks at Fisherman's Terminal.

The jobs that would be displaced by Alternative IBB-3 are not white-collar or big tech jobs. They are industrial jobs, jobs in the trades, and jobs that continue Ballard's historic connection to the maritime industry. The continued existence of these industrial and maritime lands, businesses and jobs is a matter of equity, because about two-thirds of industrial jobs are available to those with only a high school diploma, and over half of all maritime jobs are available to those with no formal educational training at all.² These industrial, manufacturing and maritime jobs, and careers in the trades, provide vital paths to economic wellbeing not only because formal educational barriers are low, but because many of these jobs are unionized, and provide high quality benefits.³ In Seattle, these are jobs and workspaces that may not be replaceable. The WSBLE DEIS does not account for this, and the FEIS should.

a. The FEIS Must Account For, Analyze and Mitigate Hard-to-Replace Jobs in Onshore Industry, Manufacturing and the Trades.

Sound Transit has identified Alternative IBB-3 as the route segment alternative that would displace the most jobs not only among the IBB alternatives, but among *any alternative on the Ballard Link*. *See* DEIS pg. 4.3.3-6 (Table 4.3.3.2). A quick look at the map shows one obvious reason this is so: among the above-ground alternatives, this route will slice through fewer parking lots and vacant parcels, and more occupied, working businesses. (Of course, all of the above-ground alternatives are expected to have substantially greater displacement impacts than the tunnel alternatives.).

Each business, resident and employee displaced is a serious matter, and we appreciate Sound Transit's conscientious study and consideration of these effects. However, the displacement of industrial jobs has different, deeper public impacts in Seattle generally, and in Ballard specifically.⁴ Under Alternative IBB-3, our neighbors' industrial jobs, maritime jobs, and jobs in the trades would disappear from the Ship

³ *Id*.

² Seattle Industrial Lands DEIS pg. 1-3

⁴ See generally City of Seattle Industrial and Maritime Strategy Council Recommendations, June 2021, at 12 (citing "[i]mpacts of a potential Sound Transit Alignment" through this area as a "top issue," and naming a vision that [1]ight rail is successfully integrated without hurting industrial users").

Canal to Market Street. On Shilshole Avenue, these jobs are at AMC Cliffy's Marine Services (servicing marine HVAC and refrigeration systems since 1980) and Onshore Yacht Refinishing (specializing in restoration, repair and refurbishment of antique boats).⁵ On NW 46th Street, Alternative IBB-3 would mean the loss of jobs repairing outboard engines at Ballard Marine Service, which has been in business for over 30 years.⁶ Alternative IBB-3 would similarly displace welder-owned Ballard Mariner Fabricators on Ballard Way, which specializes in marine exhaust systems, fuel tanks and hull repair.⁷ And in multiple spaces between Shilshole Avenue and NW 50th Street, Alternative IBB-3 would the loss of jobs at Mac's Upholstery -- our neighbor for 74 years -- which manufactures canvas and upholstery for Trident Seafoods, Foss, Alaska Longlines and even the US Navy and Coast Guard.⁸

With the exception of AMC Cliffy's, the DEIS' economics section does not acknowledge the maritime dependence of these businesses. DEIS pg. 4.3.3-11. <u>We hope the FEIS will acknowledge the other members of this community.</u>

Of course, many of our neighborhood's other at-risk jobs are in non-maritime trades or industries. Under Alternative IBB-3, we would also miss Marian Built general contracting (whose principal has been welding since age nine and whose custom wood and reclaimed steel work can be seen as high as the Smith Tower observatory), and Hurst Custom Furniture and Ballard Custom Cabinets (where a former Boeing 787 engineer leads a team of fine craftspeople).⁹

These businesses provide industrial and manufacturing work and trades that have long made Ballard special but have become all too rare City-wide. <u>We hope that in the FEIS and decision-making</u> <u>process, Sound Transit will more clearly recognize that in today's economy, jobs can be more difficult to</u> <u>replace than housing or commercial square footage - especially when good, family-wage jobs in</u> <u>manufacturing, industry and the trades.</u> In the case of Alternative IBB-3, Sound Transit's analysis does not yet tell the whole story of the devastating effects this alternative would have on local jobs.¹⁰ The FEIS must account for the unique loss of these industrial lands and trade jobs.

Even where this analysis does differentiate among types of businesses that would be lost, it does not provide enough quantitative information for these impacts to be understood or analyzed. *See id.* (disclosing that Alternative IBB-3 would displace "some water-dependent businesses on the north side of Salmon Bay"). *The FEIS should specify how many hard-to-replace industrial and maritime-dependent businesses this would be, and how many hard-to-replace industrial and maritime-dependent jobs.*

⁹ APN 2767702145; 0467000385 (both to be acquired, displaced or relocated only under IBB-3); *see* DEIS L4.1-44; <u>https://www.hurstfurniture.com/about; http://seattlecustomcabinets.com/About_Us.html</u>.

⁵ APN 0467000385(to be acquired, displaced or relocated only under IBB-3); *see* DEIS L4.1-44; <u>www.marianbuilt.com</u>.

⁶ APN 2767702270 (to be acquired, displaced or relocated only under IBB-3); *see* DEIS L4.1-44; <u>https://www.ballardmarineservice.com/about</u>.

⁷ APN 2767702225 (to be acquired, displaced or relocated only under IBB-3); *see* DEIS L4.1-45; <u>https://www.ballardmarinefabricators.com/</u>.

⁸ APNs 2768400020 and 2767701750 (both to be acquired, displaced or relocated only under IBB-3); *see* <u>https://www.mactops.com/seattle-boat-and-yacht-upholstery.php</u>.

¹⁰ See also DEIS L4.2-50 at discussion of Policy BI-P2 and BI-P17.

The DEIS section that purports to explicitly analyze land conversion also misses the mark. Its reliance on the City of Seattle Future Land Use 2035 dataset is aspirational, not illustrative, because that dataset does not truly account for which industrial businesses have held out despite economic pressures and which parcels have already been effectively converted despite their zoning. For this reason, it likely overstates land conversion in some zones, and understates land conversion in others. <u>The FEIS should use more reliable, real-life metrics and data sets to quantify and analyze land conversion.</u>

The DEIS provides casual observation that displaced businesses in the area "could . . . be harder to relocate due to their need for water access," DEIS pg. 4.3.3-9. The FEIS must expand on this analysis, and properly address the unique difficulties in successfully relocating jobs and businesses in manufacturing, industry and the trades.

b. The FEIS Must Account For, Analyze and Mitigate Disruption to On-Water Maritime Jobs, Businesses, and Community.

In much the same way as the DEIS understates and under-analyzes Alternative IBB-3's negative impacts to *on-land* industrial, maritime and trades jobs, it has a similarly conclusory approach to evaluating impacts on the water. Fisherman's Terminal and Salmon Bay Marina are a little farther afield from the SBFP Property, but we believe that Sound Transit should be sure to properly quantify, acknowledge and analyze the impacts its economic health has on all of Ballard, Seattle and beyond. On-water maritime jobs and businesses are *even more* difficult to replace than their on-land industrial or maritime-adjacent counterparts, because they depend not only on industrial space, but on also on shoreline access. Our family has seen how the maritime industry has defined Ballard's culture and is both an additional source of good, family-wage jobs and an economic powerhouse of statewide significance.

Unfortunately, Alternative IBB-3 would compound the effect of lost on-shore maritime-adjacent jobs with new constraints on access between the navigation channel and Fisherman's Terminal, even while this alternative would reduce moorage in both Salmon Bay and at Fisherman's Terminal. *See generally* DEIS pg. 3-122. The DEIS also points out that Alternative IBB-3's guideway columns would "further limit an already constrained area" of commercial boat traffic near fisherman's terminal, dramatically limit height limits to vessels in the vicinity of Salmon Bay, reduce berths by about 13%, and remove the <u>only</u> bilge/pump-out facility in Fisherman's Terminal. *Id.* Vehicular access to the terminal would also be impaired, DEIS pg. 3-125, but it is unclear to what extent, and no mitigation is analyzed. *See, e.g.*, DEIS pp. 3-125; 4.3.3-9.

The DEIS does not analyze what impact these combined issues would have on Fisherman's Terminal and Salmon Bay Marina and its Alaska fishing fleet, relying only on generalities like "columns on the south side of Salmon Bay . . . could affect access and circulation within Fishermen's Terminal, as well as displace some uses on the property," and understatements like "[b]usinesses at Fishermen's Terminal are involved in regional waterway transportation and freight movement." *Id.* at pg. 3-122. *The FEIS must do more to actually quantify and analyze the individual and cumulative effects of all these impacts on Fisherman's Terminal, and by extension, our broader region's maritime economy.*

The DEIS's section on <u>mitigation</u> for maritime impacts is even more vague. *Compare* DEIS pp. 4.3.3-17 through 4.3.3-18 (Section 3.3.6, Mitigation Measures); *with* DEIS pg. 4.3.3-10 through 4.3.3-11 (Impacts to Maritime Industry) and 4.3.3-16 through 4.3.3-17 (Section 4.3.3.5, Indirect Impacts of the Build Alternatives). The description of <u>all</u> economic mitigation measures is shorter than the section on maritime impacts itself and contains <u>no</u> specific information about how Alternative IBB-3's combined impacts to the maritime industry would be mitigated. The bulleted mitigation measures are boilerplate in some instances and placeholders in others, so it is possible that this information was unintentionally omitted. <u>*The FEIS*</u>

must specifically describe construction and operations mitigation measures will be taken to avoid substantial negative impacts on the unique fishing fleet that makes its home at Fisherman's Terminal.

It is also possible that some of these omissions may be the result of choosing the wrong datasets. Specifically, the DEIS admittedly omits many vessel-borne jobs in its comparative statistics. DEIS Pg. 4.3.3-17. Vessel-based businesses are real businesses, and vessel base jobs are real jobs, so Sound Transit must reexamine its conclusions that acquisitions and construction in Fisherman's Terminal "would only displace one water-dependent business there." DEIS pg. 4.3.1-7; *see also* DEIS pp. 4.3.2-11 and 4.3.3-5 (acknowledging that IBB-3 would convert the more Port of Seattle land to transit use than any other alternative, but apparently still excluding vessels from displacement analyses). *The FEIS must quantify and include vessel-based employment and business displacements in its comparative analyses, such as at Tables 4.3.3.2 and 4.3.3.2, and in the narrative analyses supporting that Table.*

The DEIS is certainly correct in observing that "IBB-3 would likely be the most disruptive to the maritime cluster [and] would likely have broader impact to the fishing and recreation industry." DEIS pg. 4.3.3.17. But it must analyze those effects in detail, and it must investigate whether in fact "boats are . . . able to use other docks and find substitutable services." *Id.* Seattle's shorelines and water ways are among our most precious and irreplaceable resources, so these impacts will be among the most difficult to truly mitigate. *For that reason, we hope that the FEIS will have an expanded analysis of whether these adverse impacts can truly be mitigated, and what the region-wide effects would be.*

2. The FEIS Must More Thoroughly Account For, Analyze and Mitigate the Many Other Impacts of Alternative IBB-3 and Other Elevated Alternatives.

a. The FEIS Should Expand Its Analyses of Negative Impacts on Aquatic Life and Treaty Obligations.

Though our family has had roots in Ballard since at least the 1890s, the Muckleshoot, Suquamish and Duwamish peoples have been present in this area for far longer, and the region's salmon and other aquatic residents have lived here for longer still. We cannot speak for these tribes or for the salmon, but we do wish to offer our support to both of them as pillars of the Ballard community and culture. However, the DEIS's Alternative IBB-3 discussion provides more placeholders than true information or analyses. *See*, *e.g.*, DEIS pgs. 4.3.3-12 and 4.3.3-15 (treaty rights); 4.3.8-10, 4.3.9-9, and 4.3.9-11 through 4.3.9-12 (aquatic ecosystem). That is why the FEIS must further emphasize, quantify and analyze the in-water and shoreline impacts of Alternative IBB-3 and other elevated alternatives, and in turn, the potential ramifications for fish habitats and treaty-protected fishing rights. *The FEIS must specifically analyze, quantify, and discuss the WSBLE's potential impacts in-water, on shorelines, to aquatic habitats and to treaty-protected fishing rights. It must name the mitigation measures that are proposed and discuss whether all potential adverse effects truly can be mitigated.*

We recognize that our family's membership in the Ballard community is much, much more recent than that of the tribes or the salmon, and we hope that Sound Transit's environmental analysists and leadership will heavily weigh the likely adverse impacts of <u>all</u> bridge alternatives. To the extent that affected tribes and environmental advocacy organizations have raised concerns about negative impacts to treaty rights and fish habitat, we stand behind them.

b. The FEIS Should Expand Its Analyses of Impacts on Views and Community Cohesion.

This letter prioritizes our concerns about workers and employment, tribal treaty rights and aquatic resources. However, there are additional adverse effects of Alternative IBB-3 (and to a lesser extent, the other elevated alternatives) that are worthy of clarification in the FEIS.

First, we share many of our neighbors' worries about the potential impacts of the elevated alternatives to views in Ballard. The DEIS tells part of the story, finding that visual quality impacts to sensitive viewers under Alternatives IBB-2a and IBB-2b would be "none," while elevated alternatives would reduce "high" visual quality of views to "average" for Alternatives IBB-1a and IBB-1b, and to "low average" for Alternative IBB-3. See DEIS pg. 4.3.5-15 (Table 4.3.5-2). However, this analysis retains vague placeholders that block the decision-maker's view of the full extent of these impacts and proposed mitigation. For example, with respect to Alternatives IBB-1a and IBB-1b, the DEIS lists three different potential bridge types that would each "have different visual characteristic and different potential impacts on the visual quality of views seen by sensitive viewers." DEIS pg. 4.3.5-12. The purpose of NEPA and SEPA is to describe these visual characteristics and potential impacts now, not at some unknown future date. Similarly, the DEIS would postpone analysis and discussion of mitigation measures under Alternative IBB-3 until after NEPA and SEPA processes were completed. DEIS pg. 4.3.5-17 ("Through design review in coordination with the City of Seattle, Sound Transit would consider measures to minimize impacts to visual quality . . . such as design guidelines and context-sensitive designs.") The purpose of the EIS is to analyze and describe potential mitigation efforts now, so that the community and Sound Transit's decisionmakers can understand the full extent of the proposal. These view impacts are important to the Ballard community, so the FEIS should describe the view impacts of each different potential bridge type, as well as the nature and impacts of potential view mitigations over the Ship Canal.

Second, the FEIS should acknowledge how maritime and industrial impacts, tribal treaty impacts, view impacts and other effects would (individually and together) change the close cohesion of the Ballard neighborhood.¹¹ The Ballard community is fundamentally rooted in its proximity to water, from its maritime and industrial presence, to views of our historic bridge and the presence of tribal members fishing by gillnet pursuant to their treaty rights. These elements pull our neighborhood together into community and create a distinctive sense of place, but the DEIS apparently only looks to "physical barriers, connections to social resources and community facilities, or notable changes to traffic patterns" as potential causes of lost neighborhood cohesion. DEIS pg. 4.3.4-9. In Ballard, as in other neighborhoods, our cohesion is historical and cultural as much as it is physical. For us, Ballard holds an important place in our family history, and we value our continued presence and contribution to its culture and economy. As landowners, we are committed to helping Ballard continue to grow and flourish for generations to come. Some references in this section do make sense, such the note about how Alternative IBB-3 would create a more visual barrier between east and west Ballard. *The DEIS should have a more detailed and less conclusory analysis of impacts to neighborhood cohesion in the Interbay/Ballard Segment*.

¹¹ Sound Transit defines "neighborhood cohesion" as "the extent to which residents have a sense of belonging to their neighborhood," and notes that this metric "considers interactions between the residents and the resources in that neighborhood." DEIS pg. 4.3.4-1. This definition does not expand on what kinds of neighborhood features are considered "resources," but context suggests that a neighborhood's "resources" are something more than just its social resources and its community facilities.

3. The Tunnel Alternatives Best Serve the Ballard Community.

SBFP strongly supports 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 15th Avenue West approach for the Interbay-Ballard segment would permanently displace SBFP's tenants and dozens of other family-run and community-based enterprises. Most notable among those are industrial and maritime businesses that support good, family-wage jobs throughout our community. By contrast, the tunnel alternatives would result in less industrial and maritime displacements as well as fewer negative impacts on aquatic life and tribal treaty rights.

The DEIS's overall generalization and undetailed discussion of industrial land, business and job losses could have great impacts on Sound Transit's decision-making if these matters are not clarified. *See*, *e.g.*, DEIS 6-25 through 6-32 (repeating the above-discussed generalizations and other issues throughout the alternatives evaluation. We hope that Sound Transit will resolve them in the FEIS so that the true impacts of WSBLE will be disclosed, analyzed, and factored into the decision-making process.

The FEIS is an opportunity for to fix parts of the DEIS that gloss over impacts to Ballard's communities that likely are irreversible and cannot be mitigated. Our family's loss of the Property would be a major personal loss of our connection to Ballard, but we wanted to make sure that Sound Transit captured the entire picture of how the IBB segments could change our community. We look forward to building Ballard's next generation of transportation infrastructure together.

Sincerely,

SBFP Corporation Shareholders

Fridricka MBulenger

Fredricka N. Bolinger Vice President SBFP Corporation



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April 28, 2022

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

via email WSBLEDEIScomments@soundtransit.org

Re: Mariners Comments on the WSBLE Draft Environmental Impact Statement

Dear Ms. Swift,

This comment letter is submitted by the Seattle Mariners in response to the West Seattle and Ballard Link Extension (the "**WSBLE**") Draft Environmental Impact Statement (the "**DEIS**"). The Mariners enthusiastically support the expansion of light rail opportunities and appreciate the hard work of Sound Transit associated with this process. Each year, the Mariners welcome over 2.5 million guests to over 100 events at T-Mobile Park, a publicly owned facility.¹ Approximately 8%-12% of T-Mobile guests use light rail. The Mariners' long-range transportation planning anticipates even greater reliance on light rail throughout the next several years, with the goal of doubling usage of light rail to attend Mariners games at T-Mobile Park. We look forward to expanded services and expanded options for our fans and employees.

T-Mobile Park is located west of Stadium Station. Based on recent surveys, approximately 85% of the ballpark's light rail ridership use Stadium Station while the remaining 15% use either the SODO Station or the Chinatown-International District ("**CID**") Station. T-Mobile Park attendees also walk and drive through SODO, Pioneer Square, and the CID neighborhoods before and after games and events. Our primary focus, however, is on the CID Segment analyzed in the DEIS.

To help Sound Transit successfully deliver the WSBLE, the Mariners have several comments regarding: (1) construction impacts; (2) operational impacts; and (3) mitigation we hope can be addressed in the Final Environmental Impact Statement (the "**FEIS**") regardless of the selected route of the new line.

¹ T-Mobile Park is owned by the Washington State Major League Baseball Public Facilities District (<u>https://ballpark.org</u>).

1. Construction Impacts to T-Mobile Park Require Additional Analysis in the FEIS.

At the outset, it is important to note the significant construction duration for the CID Segment and how that will impact the millions of guests that visit T-Mobile Park (and Lumen Field) each year. Under CID-1a, the construction duration is 9 to 11 years. This duration is significantly longer than other WSBLE segments. Because of this decade-long construction duration, the construction impacts cannot be dismissed as temporary in nature. The FEIS should study methods to reduce the construction duration under all alternatives, but especially if Sound Transit decides to pursue Alternatives CID-1a or CID-1b, which have the longest construction duration in this segment.

The following construction-related impacts to T-Mobile Park require additional analysis in the FEIS, and potential mitigation for these impacts is discussed below.

a. <u>Stadium Station Closure in Alternative CID-1a Would have Significant Impacts to T-</u> <u>Mobile Park Accessibility, Parking Availability for Games and Events, and Pedestrian</u> <u>Access.</u>

Under Alternative CID-1a, Stadium Station will be closed for two years. As noted above, a majority of T-Mobile Park visitors arriving or departing by light rail use Stadium Station. The closure of Stadium Station will put additional pressure on the construction-related transit disruptions discussed below. The FEIS must analyze the impact of Stadium Station's closure on T-Mobile Park. The FEIS does not currently address event surge conditions during the construction period, and it must be updated to analyze these conditions for the full construction duration, with particular attention to the two-year period of Stadium Station's closure under Alternative CID-1a. How will transit-riders arrive at the ballpark? What will be the increased demand for SODO Station and CID Station during Stadium Station? How will closure of Stadium Station affect parking availability as more attendees drive due to the disruption in light rail service?

The Mariners are working hard in coordination with the Seattle Department of Transportation to meet and exceed their Transportation Management Plan ("**TMP**") goals. Use of light rail is critical to meeting these goals, but with Stadium Station closed, there will be no way to meet the existing TMP goals, let alone additional requirements SDOT is suggesting. The FEIS must carefully analyze the impacts of the Stadium Station's closure, and there must be adequate mitigation to address the closure, particularly during the 6 to 7-week period when the entire light rail line will be disconnected between the SODO Station and CID Station under Alternative CID-1a.

b. <u>Removal of the 4th Avenue Viaduct in Alternatives CID-1a and CID-1b will have a</u> <u>Significant Impact on Traffic and Accessibility.</u>

Under Alternatives CID-1a and CID-1b, the 4th Avenue Viaduct will be closed for a minimum of four years. Currently, 4th Avenue South supports 16,700 to 36,900 average daily trips as a conduit to and from Downtown Seattle and SODO. *See* Table 4-34 of the DEIS Transportation Technical Report. As noted in the DEIS, "[t]he primary effects from construction would occur with the two 4th Avenue Build Alternatives (Alternative CID-1a* and Option CID-1b*), as described below. 4th Avenue South carries approximately 30,000 vehicles per day as a primary north-south arterial connecting SODO to Downtown Seattle. Closure of all or portions of 4th Avenue South would

result in substantial diversion of traffic throughout arterial and local streets within the Chinatown-International District and surrounding areas." DEIS Transportation Technical Report, Pg. 4-123.

The FEIS must analyze the impact of the 4th Avenue Viaduct closure with T-Mobile Park event surges. The DEIS acknowledges that the 4th Avenue Viaduct closure will result "in increased congestion and poor operations between South Jackson Street and Edgar Martinez Drive." DEIS Transportation Technical Report, Pg. 4-124. And Table 5-54 of the DEIS Transportation Technical Report includes Edgar Martinez Drive and South Royal Brougham Way as a destination for thousands of diverted daily commuters under the CID-1a and 1b Alternatives. This congestion will likely be untenable on gamedays, and these event surge impacts must be disclosed and analyzed in the FEIS.

Additionally, the FEIS needs to clarify whether the Weller Street Bridge will remain accessible during construction. It appears the Bridge likely will not be accessible under Alternative CID-1a and CID-1b with closure of the 4th Avenue Viaduct. ("Under Alternative CID-1a*, the 4th Avenue South access to the Weller Street Bridge would likely be closed, although a temporary pedestrian crossing of the construction area may be possible." DEIS Transportation Technical Report, Pg. 6-48.) If that is the case, then the FEIS needs to analyze the likely route from the existing CID Station to T-Mobile Park. This pedestrian route will be particularly important during the two-year period Stadium Station is closed when more T-Mobile Park visitors will be using the CID Station to reach the ballpark.

c. <u>Pedestrian Impacts Must be Further Analyzed and Safe, Accessible Pedestrian</u> <u>Routes Must be Detailed to Ensure Continued Pedestrian Access to T-Mobile Park.</u>

In addition to the pedestrian impacts already identified for further analysis, the FEIS must include more information about anticipated sidewalk closures during construction. The introduction to the "Construction-Related Roadway Modifications" attachment to the Transportation Technical Report says, "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." 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. Now is the time to disclose and analyze the adverse impacts of the WSBLE. The FEIS discloses partial and full roadway closures due to construction. If there is not enough specificity around sidewalk closures, then the FEIS should assume a worst-case analysis and analyze commensurate sidewalk closures.

Furthermore, light rail users arriving from south of Stadium Station will still need to access T-Mobile Park when the light rail segment between the Stadium Station and CID Station will be closed under Alternatives CID-1a and CID-1b. The FEIS needs to analyze the likely route from SODO Station to T-Mobile Park for these pedestrians, especially in light of the industrial nature of the surrounding area and heavy-truck routes therein.

This updated pedestrian analysis must also account for the 4th Avenue Viaduct closure, the Weller Street Bridge closure, Stadium Station closure, and event crowd surges.
d. Freight, Transit, and Parking Impacts Must be Further Analyzed in the FEIS.

The following "Potential Roadway Closures" diagram for CID-1a illustrates the major roadway closures around T-Mobile Park for the 9 to 11-year construction duration. Three sides of T-Mobile Park are identified as streets with "potential traffic increase."



Freight. With the full closure of South Holgate Street under all three SODO alternatives, the Transportation Technical Report explains that significant truck traffic from this designated "heavy haul route" would need to be diverted, with Edgar Martinez Drive South and South Royal Brougham Way identified as likely routes.

Closing South Holgate Street, a City of Seattle heavy haul route, would require diverting approximately 900 peak hour vehicle trips, including relatively high truck volumes. Potential diversion routes would include South Lander Street, Edgar Martinez Drive South, and South Royal Brougham Way, along with portions of 6th Avenue South and Airport Way South. South Lander Street would be closed during construction of some of the West Seattle Link Extension alternatives in the SODO Segment, but South Holgate Street and South Lander Street would not be closed at the same time. While there is sufficient roadway capacity on most of these streets to accommodate the diverted traffic, the intersection of South Lander Street and 6th Avenue South would become further congested, as would the Edgar Martinez Drive South/1st Avenue South intersection. The added volumes on South Royal Brougham Way would also cause delays and vehicle queuing at the Link light rail signalized crossing.

DEIS Transportation Technical Report, Pg. 4-122. The DEIS fails to overlay these 900 peak hour vehicle trips, including "relatively high truck volumes," with event surge traffic. This South Holgate Street closure is anticipated for two to three years. The FEIS needs to analyze the impact to this reroute during events and consider vehicular and pedestrian impacts due to the reroute.

Transit. The FEIS needs to fully analyze anticipated transit rerouting and impacts to service during construction. Table 3-36 of the DEIS Transportation Technical Report highlights the number of bus routes disrupted during construction, particularly under Alternatives CID-1a and CID-1b, which

would include closure of the Seattle Streetcar. These closures indicate hundreds of disrupted buses per hour for multiple years during the construction period. The analysis in the DEIS does not account for event volumes. And there needs to be focused analysis for the two-year period when Stadium Station is closed. This is a major gap in the analysis because there will be hundreds of games and events with very large crowds during the multi-year construction period.

Parking. Loss of parking around T-Mobile Park should also be evaluated in a game/event surge condition. With disruption to reliable transit options, the FEIS should consider an increase in vehicular use and analyze the impacts for events.

e. <u>The Cumulative Effects Analysis Must be More Robust and Consider a Wider Range</u> of Foreseeable Impacts, Including Impacts due to the Ongoing Industrial and <u>Maritime Strategy, and Future Development Projects.</u>

The DEIS cumulative effects analysis 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 several industrial areas will be allowed additional density to incentivize further industrial development.² OPCD is moving to its own FEIS this summer, and it expects to adopt new regulations in early 2023.

The cumulative effects analysis in the FEIS must take these anticipated land use changes and increases in density into consideration. The changes will likely spur more development in industrial areas, potentially creating conflicts and concurrent construction impacts with the WSBLE work.

Additionally, 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 currently downplayed in the 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 Transportation Technical Report, 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.

f. <u>Construction Sequencing Must be Decided Upon, Disclosed, and Analyzed.</u>

The cumulative impacts analysis focuses on WSBLE impacts combined with other project impacts, but it also inadequately discloses its own cumulative impacts by disclosing the system-wide transportation and pedestrian impacts due to the lack of information on segment construction sequencing.

² See <u>https://www.seattle.gov/opcd/ongoing-initiatives/industrial-and-maritime-strategy</u>

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.

2. Operational Impacts to T-Mobile Park Require Additional Analysis in the FEIS.

In one of the only references to events, the DEIS states it does not consider crowd surges related to games or events at T-Mobile Park, Lumen Field nor duel events that both stadia occasionally host on the same day.

The ridership forecasts presented in this section do not directly forecast transit ridership during special events at venues such as T-Mobile Park, Lumen Field, Washington State Convention Center, Climate Pledge Arena, and the grounds of Seattle Center. While it is expected that additional ridership would be experienced on the light rail system during days with events at these facilities, it is not included in the forecasts. These events are intermittent and occur during various times of the day, with the highest surge often occurring outside of peak travel times. These events would occur without the light rail expansion, and the WSBLE Project would provide additional high capacity transit service to support this demand and facilitate access by efficiently moving attendees and staff to and from these areas.

DEIS Transportation Technical Report, Pg. 3-40. This logic fails to consider the difference between the proposed alternatives, and the statement that events are "intermittent" is inaccurate given that the referenced facilities host events nearly every day of the year, including over 100 events with attendance averaging over 25,000 at T-Mobile Park and Lumen Field alone.

Upon completion of the WSBLE, under Alternative CID-1b and all CID-2 Alternatives, there will not be a stop at Stadium Station for all lines. This means more riders will use the SODO Station and CID Station to access T-Mobile Park. How will this impact overall use of the light rail for T-Mobile Park visitors? What are the pedestrian routes associated with the alternatives? How will the removal of Stadium Station be mitigated?

The FEIS needs to consider game and event demand and ridership levels under the different alternatives to adequately evaluate the operational impacts, including days in which both Lumen Field and T-Mobile Park host events.

3. Suggested Mitigation for Consideration in the FEIS

Based on the impacts identified above and the impacts identified in the DEIS, the Seattle Mariners encourage consideration of robust mitigation to support a healthy transportation system in and around T-Mobile Park. The following mitigation measures are in the FEIS.

a. <u>Construction Mitigation</u>

The FEIS needs to include a much more detailed mitigation analysis for the transportation and transit impacts during construction. The DEIS discussion of construction mitigation essentially states mitigation will be coordinated with the City of Seattle and King County Metro later. DEIS Transportation Technical Report, Pg2. 3-65 to 3-66. A complete environmental analysis must discuss thoughtful mitigation strategies. After the FEIS analysis is updated to disclose vehicular, transit, and pedestrian impacts for games and events during construction, then the mitigation analysis must be updated with meaningful ways to address these construction impacts. The T-Mobile Park user experience for light rail riders cannot be written off for 9 to 11 years.

Based on the information available at this stage, the following construction mitigation measures should be the minimum considered in the FEIS:

- Wayfinding and other pedestrian enhancements through construction areas to allow continued access to T-Mobile Park through the surrounding neighborhoods.
- Wayfinding and other pedestrian enhancements from CID Station and SODO Station, particularly during Stadium Station closure.
- Shuttle service to the ballpark during Stadium Station closure under Alternative CID-1a.
- If complete closure of the light rail between the CID Station and the SODO Station is required, ensure the 6 to 7-week closure occurs outside the Major League Baseball season.
- A renewal of the free ride zone program down 1st Avenue to allow ballpark attendees to park downtown.
- Adequate bus service to the ballpark during gamedays in the rerouted bus configurations.
- Pedestrian safety measures due to increased traffic volumes around the ballpark.
- Reinstate the Park and Ride system to T-Mobile Park on gamedays.

b. Operational Mitigation

- Wayfinding and other pedestrian enhancements (including lighting, landscaping, painting, sidewalk improvements, etc.) from the CID Station and SODO Station to T-Mobile Park, because more riders will use those stations due to not all lines stopping at Stadium Station under at least one Alternative.
- Wayfinding and other pedestrian improvements to address event surges during operations.
- Operational plans to address event surges.

We look forward to continued engagement in the WSBLE EIS process and ongoing planning.

Sincerely, Fred Rivera



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

Dear Ms. Swift:

Comments provided below are submitted on behalf of the property located at 1616 West Bertona, a property that is under contract for the new Seattle Storm practice facility. The Property is currently home to a surface parking lot, but will soon be the new headquarters and practice facility for the Seattle Storm.

We submit the following comments to the WSBLE Draft Environmental Impact Statement ("DEIS"). The comments are categorized according to: (1) Important general community considerations that should guide project decisions; and (2) specific comments and/or recommendations regarding project specific impacts.

General Community Considerations To Guide Agency Decision-making:

- <u>Property Usage</u>. 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 will remain.
- <u>The Dravus Interbay Businesses Must Continue to Operate and Thrive.</u> This Interbay neighborhood has been evolving into a vibrant commercial district comprised of mostly small businesses operated by independent owners. It is critical that the project coordinate with Sound Transit and the City of Seattle to ensure they can remain open during construction, while also providing relief and assistance so that further business closure and loss is avoided.
 - Transit Connections and Pedestrian Movement are Critical. We believe it will be important to ensure Sound Transit designs and operates a station to effectively serve a highly diverse set of users and the intensive pedestrian environment in which the station will be located. 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; and potential increases in crime.



- <u>Leverage and Effectively Coordinate Light Rail with other Transit Systems serving this</u> <u>neighborhood.</u> The Dravus/Interbay neighborhood is served by King County Metro Transit and Sound Transit must ensure the design and operations of the new light rail line will effectively leverage and coordinate with this system, as well as the new bicycle and pedestrian infrastructure in development.
- <u>Coordination and Linkage to City of Seattle Projects.</u> There are numerous other capital projects in this vicinity that will be completed prior to the time of Sound Transit's project such as construction of a new Seattle Storm Practice Facility at 1616 West Bertona, stretching from 16th to 17th streets. Sound Transit needs to further evaluate any and all impacts to this project and study shifting the rail line to avoid impacting this property.
- <u>Consider Leveraging Transit Oriented Development Opportunities.</u> The agency should explore during its early planning and design phase where there are opportunities to partner or build the light rail station and line in conjunction with other development occurring in the neighborhood and maximize community development opportunity.

Specific Comments in Response to DEIS:

- <u>Project Construction Impacts</u>: The DEIS lacks critical information on how the project and proposed station location construction will impact access and circulation within the neighborhood and Interbay with its dense mixed-use developments as well as key venues such as the Seattle Storm Practice Facility. This information is critically necessary to inform the community's choice for a preferred station location given such construction impacts could result in the permanent displacement of existing businesses. Given what is at stake, we ask Sound Transit to conduct studies now and provide this information to the public because we believe such information will be important for both the public and Sound Transit in making decisions about the station and the project in this segment area. 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.
- <u>Construction Management Plan</u>: We request the establishment of a Construction Coordination Committee with agency representatives from Sound Transit and City of Seattle to develop a plan to minimize construction impacts. Such a construction management plan should include:
 - 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.
- 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.
- Local businesses please provide a clear analysis of parking impacts during construction to allow unfettered access for customers that frequent private businesses and proposed mitigation measures for customer access to businesses.
- There are numerous concerns about the stability of the soil at this station entry which has layers of peat bogs, unsuitable fill, and a very high water table that need to be studied further to ensure the geotechnical requirements are understood by the neighborhood and existing buildings that will be affected.
- <u>Alternatives</u>: The DEIS fails to provide critical information in its study and comparison of possible alternatives. More information is needed on concepts as the "mix and match" of alignments connecting the Smith Cove station to this station and beyond to the Ballard Station. We request additional analysis be completed to study whether moving the station location possibly north and west on Thorndyke/17th to avoid the Storm Practice Facility and other longstanding businesses at risk of demolishment, and to better serve the area.
 - <u>Keeping traffic moving along Dravus during construction</u>: The DEIS lacks critical information in its study of transportation impacts for this station. To maintain access and reasonable traffic circulation during construction, Sound Transit needs to develop a multi-modal, Transportation Mitigation plan with SDOT to assess impacts and access to the community.
 - <u>Cut and Cover Construction Approach</u>: The DEIS lacks critical information about the impacts of Cut and Cover Construction and possible alternative methods. Given the particularly significant noise impacts from the cut-and-cover method, the DEIS should evaluate alternative construction techniques such as mining to mitigate these significant adverse noise impacts.
 - <u>Cumulative Impacts Should be Better Understood and Addressed</u>. The DEIS lacks critical information around project cumulative impacts for this neighborhood resulting from construction impacts and road closures, which are presented in isolation from one another. The project and its construction plans should be carefully analyzed in a more holistic fashion for the public and decisionmakers to better understand the cumulative



impacts of such a project, particularly in segment communities such as Interbay, where disruptions could have significant region and citywide implications.

• <u>Transit Oriented Development Opportunities</u>

Please provide a side-by-side analysis and visual depiction between alternatives showing the land that is anticipated to be required by Sound Transit that could be available for disposition after the project is completed.

• Displaced Properties

Provide a side by side comparison between alternative stations of residential and commercial properties impacted through acquisitions and construction staging. A chart provided by Sound Transit in the Chapter 6 "alternatives evaluation" provides number of properties impacted but does not provide specific documentation in order to understand the implications to each station alternative

Thank you for your consideration and review of our comments. We look forward to further engagement and information from Sound Transit on these important, long term and lasting issues.

Sincerely,

Lisa Brummel Manager, Force 10 Hoops, LLC Co-owner, Seattle Storm

Silverstein Westlake Owner LLC

7 World Trade Center – 38th Floor 250 Greenwich Street New York, NY 10007

April 21, 2022

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

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of Silverstein Westlake Owner LLC (an affiliate of Silverstein Properties, LLC), which is the owner of the property located at 801 Blanchard Street (TPN 0660000515 and TPN 0660000510) (the "Property") to provide comments on the Draft EIS for the WSBLE project. The Property is presently developed as the Butcher's Table restaurant, with office space above, and a surface parking lot. However, we have a permit application pending with the City of Seattle for the future development of a 440-foot tall, 418-unit apartment building on the Property.

With our roots in development in Manhattan, Silverstein Properties has a deep appreciation for the importance of rail transit in the urban environment. It is for this reason that we support the WSBLE project.

But we also have deep experience in the challenging task of weaving this rail service and the accessory components it requires – station entrances, vent locations, utility, and service rooms – with the built environment above it. One of the geniuses of the subway system in New York is how carefully and thoughtfully it is knitted into the urban environment, so that the rail transit and the housing, office space, retail and restaurants above it can co-exist and support each other.

From our review of the Draft EIS, it appears that Sound Transit is taking a different tack. Rather than working its new rail system into the urban and pedestrian environment, WSBLE proposes to demolish blocks of development Downtown to make way for over-sized station entrances and headhouses. Admittedly, it is difficult to reach any final conclusions from the information provided in the Draft EIS; nevertheless, it does not appear that the WSBLE system Downtown is being designed to enhance the urban environment of the Center City.

The Property is a good example. One alternative in the Draft EIS appears intent on leveling the entire block on which the Property is located, which would then replace a planned housing development, with adjoining restaurants and retail space, with a station house – which is nothing

more than a door to the underground system. Why this access requires the taking of an entire block and the elimination of the urban-activating uses it includes is not clear from the Draft EIS.

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

We therefore offer the following comments:

- 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. The Draft EIS should explore alternatives to such a closure. The Metropolitan Transportation Authority was able to build the Second Avenue subway while keeping Second Avenue open; we're confident Sound Transit can figure out how to keep Westlake Avenue open while building 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 would be happy to work with Sound Transit to explore options that would better integrate a station entrance as part of the Property into the proposed underground system.

We appreciate the opportunity to provide these comments.

Sincerely,

SILVERSTEIN WESTLAKE OWNER LLC

"n un By:

Name: /Brian Collins Title: Executive Vice President

Details	Communication
#496193	The 2 favored routes go right through the building (Dusty Strings building 3450 16th Ave W) my business leases space in. It would be massively disruptive for us
From:	given the financial investment we have made in this space which was projected over 15-20 years of occupation- we have been there 7 years to date. Are you
ROD VOS	going to compensate us for that / 1 vote for the above-ground 15th Ave version-which would still probably disrupt my business to the point of dystunction from work noise, structure-borne vibration (we are a Lab with sensitive equipment) and air-borne particulate matter.
Date Recieved:	
2/10/2022	
Created by:	
Audience:	
Reach:	
Participation:	
Engagement:	
Source:	
Online open	
Assigned	
division:	
Outreach	
Category:	
Project Phase:	
Planning	
Project	
Segment:	
Environmental	
pnase:	

Details	Communication
#500798 From: Jason Wood	My name is Dr. Jason Wood and I work and am a small business owner at Specialty Vetpath, located at 3450 16th Ave W, Seattle, WA and our landlord is Dusty Strings. I would like to say that I am in favor of the Elevated 14th St Option (from Prospect St/15th), also known as IBB-1b or secondly the proposed track revision submitted by Ray Mooers to Alexis Lair on April 2nd in which the dusty strings building would be left in place.
Date Recieved:	would be difficult for both my company and our landlords to find a similarly ideal place for our businesses within Seattle if we were to lose our current site.
4/20/2022	Thank you for your consideration.
Created by:	Dr. Jason Wood
Audience:	
Reach:	
Participation:	
Engagement:	
Source: Online open house	
Assigned division: Outreach	
Category:	
Project Phase: Planning	
Project Segment:	
Environmental phase : Draft EIS	

Details	Communication
#500763 From: ROD VOS	Hi, my business (SpecialtyVETPATH LLC) is located within the Dusty Strings manufacturing building, address: 3450 16th Ave W, Seattle, WA. I want to suggest an alternative to demolishing the building for the IBB-1b optionElevated 14th Option (from Prospect St/15th). I also support and "the proposed track revision submitted by Ray Mooers to Alexis Lair on April 2nd".
Date Recieved:	
4/20/2022	
Created by:	
Audience:	
Reach:	
Participation:	
Engagement:	
Source: Online open house	
Assigned division: Outreach	
Category:	
Project Phase: Planning	
Project Segment:	
Environmental phase: Draft EIS	



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 SVAP III Elliott Plaza LLC, which is the owner of the property located at 1523 Elliott Avenue W. (TPN 7666201695, 7666201690 and 7666201685) (collectively, the "Property") to provide comments on the Draft EIS for the WSBLE project. The Property is currently home to a retail shopping center.

The Draft EIS does not explain or evaluate the probable impacts of the WSBLE project, both with respect to the Property and to the Smith Cove station area as a whole. Our comments are as follows:

- The Draft EIS shows a future light rail station 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.
- The secondary and indirect impacts of "pre-condemnation blight" must be evaluated in the Draft EIS. The Draft EIS has now been published, which indicates for the world those properties that may be subject to future condemnation. But no decision has been made on the alignment of WSBLE and will not for some time. It will be years before real estate acquisition commences. In the intervening years, the Property will be placed in financial limbo by Sound Transit. Tenants will avoid the Property and it will be difficult to justify long-term capital investment in the buildings on the Property and dozens of other properties in a similar circumstance along the corridor. This cumulative impact will result in a loss of jobs and residents along the corridor and will promote urban blight. The Draft EIS must evaluate these impacts.



- The Draft EIS does not evaluate the development potential of the Property or the alternative uses to which it could be put, including large-scale office and research & development uses. Such uses predominate in the Elliott Avenue corridor, so the taking of the Property for WSBLE purposes will preclude such future development, and the jobs and tax revenue it represents. The Draft EIS should review these impacts.
- 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;
 - o 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 will impose a large undevelopable footprint across 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 transitoriented 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.



Sterling Retail Services 302 Datura Street, Suite 100 West Palm Beach, FL 33401 Office 561.835.1810 www.sterlingorganization.com

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, DocuSigned by: Dustin Hicks Dustin Pricks Senior VP of Construction and Development, Sterling Organization, manager of SVAP III Elliott Plaza, LLC

West Palm Beach, FL | Atlanta, GA | Chicago, IL | Washington, D.C. | New York, NY | Los Angeles, CA | Seattle, WA | San Antonio, TX

Details	Communication
#504532	
Date Recieved: 4/27/2022	Dear Commision This is Haoran Xi (Charles). The director of Texas Good Home Development Inc. We are the property owner of 3420 15th Ave W. King County (Parcel No.:8847800000). Appreciate your notice of your construction plan. We have an on-going developing plan of 39 units apartment complex right on the Queen Ann area. As I know, there is a route of sounds transit plan (among 5 routes) will go through our area. Due to this reason, I have to notice my company to stop the
Created by:	development now to wait your specific plan and weigh whether it will affect our construction or living environment of our future residents. If the development of your extension plan will not directly affect our construction, my company still have to make sure if there will be noise pollution or significant living environment
Cecelia Gunn	impact to our apartment building and further causing drop of property marketing value.
Audience: General Public	Since the possible construction plan of sounds transit will not be finalized until 2023, all these issues I mentioned above cannot be ignored for us now. My company has to notice architects and contractors to stop the development and wait for us resolve these conflicts of the construction. Please notice me the right
Reach:	way to submit a petition to your company or your commission to discuss the possible resolution. Really appreciate!
Participation:	PS: My contact phone number is 832-509-8421. Let's keep in touch.
Engagement:	Best
Source: Email	Haoran Xi (Charles)
Assigned division: Outreach	
Category:	
Project Phase : Planning	
Project	
Segment:	
Environmental phase: Draft EIS	

UNION STATION ASSOCIATES, LLC 2401 Utah Avenue South, Suite 305 Seattle, WA 98134

April 27, 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: <u>550 4th Avenue South- Comments on the West Seattle and Ballard Link</u> <u>Extension Draft Environmental Impact Statement</u>

Dear Ms. Swift,

This comment letter is submitted by Union Station Associates, LLC in response to the West Seattle and Ballard Link Extension (the "WSBLE") Draft Environmental Impact Statement (the "DEIS") published by Sound Transit.

We strongly support the voter-approved transit investment represented by WSBLE. It will provide a critical connection between our southwest and northwest neighborhoods through the City's commercial core with reliable, safe, equitable, and affordable transit. We applaud Sound Transit for working tirelessly to make this investment a reality. However, Union Station Associates has significant concerns with the inadequate environmental analysis in the DEIS that does not sufficiently analyze or study impacts to parking, traffic, and pedestrian access from WSBLE construction and operation in the Chinatown/International District ("CID") Neighborhood. The Final Environmental Impact Statement ("FEIS") must be updated with additional study and analysis as discussed further below.

I. Background

Union Station Associates, LLC owns the Union Station Garage (the "Garage") located at 550 4th Avenue South in Seattle's CID. The 1,150-stall Garage is accessed from 4th Avenue South (at Weller Street) and it provides parking for the four buildings on the block bounded by South Jackson Street, 5th Avenue South, Seattle Boulevard South, and 4th Avenue South, in addition to providing supplemental parking for the neighborhood and for the nearby stadiums on game days and for events. It is directly accessible from the Lumen Field Parking lot via the Weller Street Pedestrian Bridge, and it supplies some of the required parking for Lumen Field.

II. The DEIS does not adequately consider the WSBLE's transportation impacts.

Construction of all CID alignment alternatives will have significant impacts on the Garage. Construction of Alternatives CID-1a and 1b have the most concerning impacts.

Construction of both of those Alternatives requires closure of segments of 4th Avenue South, the intersection of South Jackson and 4th Avenue South, and South Jackson from 2nd Avenue South to 5th Avenue South for several years, which will impede access to the Garage. Construction of Alternative CID-1b would close 4th Avenue South, which is the only access point for the Garage, for at least 6.5 years, and it is unclear whether access would be possible during the subsequent 2-year partial closure. Once construction is completed, both alternatives would also eliminate the existing signalized southbound left turn lane into the Garage, permanently hindering access.

Alternatives CID-2a and 2b would have substantially fewer surface street closures, with primary closures on 5th Avenue South for 1 to 2.5 years, 6th Avenue South for 6 months to 1 year, and partial closure of South Jackson Street for 6 months, but will still have potentially significant impacts on Garage access.

In this context, the DEIS does not provide adequate study and disclosure of parking, traffic, and pedestrian access impacts to the Garage from WSBLE construction and operation from all CID alternative alignments.

A. <u>The DEIS Parking Analysis Is Inadequate</u>

The DEIS's discussion of parking impacts is surface-level at best. The Transportation Technical Report (the "Report") discloses that no detailed parking supply and occupancy studies were performed for the CID segment. Report at 5-17. It further only addresses temporary removal of street parking during construction, and does not consider removal of private garage parking during construction. *Id.* at 5-22. Yet, incongruously, the Report concludes that construction of Alternatives CID-1a and 1b are "not expected to impact parking during construction." *Id* at 5-26. This is a flawed conclusion. The Report also notes that in the long-term, Alternatives CID-1a and 1b would remove 200 stalls from the Garage. *Id.* at 5-23. Loss of these 200 stalls must be further analyzed because it would cause a long-term parking impact.

Access to the Garage may be interrupted for years because of street closures for construction. Removing a 1,100+ stall garage that is relied on by office workers, daily visitors and tourists, and for event parking will undoubtedly cause spillover parking in the adjacent neighborhoods, additional vehicular circulation through the CID as people search for parking, and could result in business displacements and loss of tenants if offices are not easily accessible. These potential temporary and permanent impacts must be studied further in the FEIS with mitigation measures identified. The FEIS should also complete a full parking study for the CID to understand how Garage availability could impact parking throughout the neighborhood. The DEIS identifies that Sound Transit will "work with owners and operators of garages where parking could be removed or where ingress or egress could be blocked during construction." Report at 5-28. But, additional, specific mitigation measures should be identified in the FEIS like Sound Transit's lease of additional parking lots to provide replacement parking with shuttles for office workers, and full compensation for owners because of lost parking and tenant revenue from long-term parking interruption.

B. <u>The DEIS Traffic Analysis Is Inadequate</u>

The DEIS traffic analysis lacks sufficient detail. The DEIS transportation technical report concludes that "[c]onstruction of the Ballard Link Extension would have limited short-term impacts to vehicle travel on regional facilities." Report at 2-13. But this conclusion significantly understates impacts. 4th Avenue South carries approximately 30,000 vehicles per day as a primary north-south arterial connecting SODO to Downtown Seattle. During professional athletics games and other events, it carries even heavier traffic volumes. The Report notes that "closure of all or portions of 4th Avenue South would result in substantial diversion of traffic throughout arterial and local streets within the Chinatown-International District and surrounding areas." Report at 4-123. Yet, there is not a specific diversion plan in the DEIS that discloses how exactly traffic would be detoured throughout the duration of WSBLE construction with specific mitigation measures to avoid gridlock with 30,000+ vehicles spilling over on to local streets combined with other street closures in the area also associated with WSBLE construction. The Report concludes concurrent closures of 4th Avenue South with other streets "would substantially affect traffic movements and congestion throughout the Chinatown-International District and SODO segments and affect a major entry point to Downtown Seattle from the South." Report at 4-124. Even if access to the Garage is theoretically maintained, we are concerned that access will be functionally interrupted for several years because of untenable traffic patterns through the CID as a result of WSBLE street closures for construction. Additional study of the cumulative impacts of street closures during AM and PM peak travel times, off-peak hours, and during events, and mitigation measures must be included in the FEIS to preserve vehicular accessibility to and through the neighborhood to the greatest extent possible.

The DEIS also notes that both Alternatives CID-1a and CID-1b would result in the elimination of the existing signalized southbound left turn lane access into the Garage, which would hinder its accessibility and require inbound vehicles to circulate through the neighborhood, adding to traffic and greenhouse gas emissions. Report at 4-92 and 4-93. If the signal at the 4th Avenue South/Weller Street Garage entrance is lost, then it will make it nearly impossible for outbound traffic to turn left from the Garage during peak hours, and even right turns will be difficult without a signal. This must be further analyzed in the FEIS. The Garage provides 1,100+ stalls, and approximately 40% of vehicles entering the garage use the southbound left turn lane access. The FEIS must analyze the traffic circulation pattern impacts and delays due to the loss of this left turn lane access to the Garage due to WSBLE operations in these alternatives.

To a lesser extent, Alternatives CID-2a and CID-2b will also affect traffic and transit with transit rerouting under Alternatives CID-2a and CID-2b and service impacts to the First Hill Streetcar under Alternative CID-2a. Significantly, Alternatives CID-2a and CID-2b will require closure of 5th Avenue S, which connects the CID neighborhood to the Garage and is the front door to the office buildings served by the Garage, and serves over 200 buses per hour. Transportation Report, Table 3-36. In addition to affecting public transit, non-public transit commuters will also be significantly affected by construction impacts, including those who

constitute the 4,500 to 5,500 average daily trips on 5th Avenue South and the 11,300 to 14,500 average daily trips on South Jackson Street. Transportation Report, Table 4-34. These closures cumulatively indicate thousands of disrupted buses, trollies, and vehicle trips per hour for the many years during the construction period. The FEIS must detail how commuters on these routes will continue to reach their destinations in a timely, safe, and cost-effective manner as significant delays will impact Garage accessibility.

C. <u>The DEIS Pedestrian Access Analysis is Inadequate</u>

The DEIS similarly does not disclose sufficient information about anticipated sidewalk closures during construction. As with traffic, sidewalk closures impact accessibility to the Garage and may result in direct and indirect parking impacts. If parking users are unable to traverse easily from the Garage to their destinations within the surrounding CID neighborhood, then this will directly impact Garage usability and demand. Maintaining clear, well-lighted, and direct sidewalk connections also impacts the actual and perceived safety of pedestrians and their likelihood to use walking routes. The DEIS discloses full and partial road closures due to construction, but it does not similarly disclose sufficient detail of full and partial sidewalk closures. It notes that under Alternative CID-1a "4th Avenue South access to the Weller Street Bridge would likely be closed," which would have significant implications for the Garage as the Bridge is the main pedestrian connection between it and the stadium district to the west. It is possible that west-travelling pedestrians would need to detour to South Main Street, several blocks away. The FEIS must provide information on all sidewalk closures anticipated throughout the CID as part of WSBLE construction and study the impacts of impaired pedestrian routes. Mitigation measures like wayfinding signage, lighting, and temporary pedestrian facilities should be identified to maintain the highest level of pedestrian access to and from the Garage and throughout the neighborhood.

Alternatives CID-2a and CID-2b also appear to affect pedestrian routes to the Garage and to the office buildings and neighborhood businesses that the Garage serves. Closure of 5th Avenue South from South Jackson Street to Weller Street, and other sidewalk closures associated with the CID-2a and CID-2b Alternatives will affect the ability for Garage parkers to access neighborhood businesses.

III. The DEIS does not adequately consider the WSBLE's economic impacts.

The DEIS considers business displacement under the CID Alternatives. The DEIS defines these businesses as "mostly commercial or institutional" and "retail and service business that serve the local community." *See* page 4.3.3-8 of the Affected Environment and Environmental Consequences – 4.3 Ballard Link Extension. This is a limited view of business displacement, and the FEIS needs to consider the potential business displacement and economic impacts to the Garage.

During construction of all CID Alternatives, the Garage will suffer major interruptions. The office buildings served by the Garage will be significantly impacted by the loss of parking in Alternatives CID-1a and CID-1b and transportation network interruptions under all CID Alternatives. Employees must be able to reach work, and a loss of 1,100+ parking stalls will result in a *de facto* business displacement in the office buildings served by the Garage. Another economic impact that requires analysis in the FEIS is around the loss of parking revenue. This loss is a direct impact of the WSBLE construction under all CID Alternatives, especially Alternatives CID-1a and CID-1b.

IV. Geotechnical considerations require further analysis in the FEIS.

A member of Union Station Associates, LLC retained Hart Crowser to conduct a geotechnical engineering review of the WSBLE proposal for the CID segment. The attached memorandum dated March 21, 2022 (the "Geotechnical Memorandum") presents the findings of that geotechnical analysis. The Geotechnical Memorandum presents a comparison of the 4th Avenue and 5th Avenue alternatives and regarding the shallow options (CID-1a versus CID-2a) and states:

In comparison to the Fifth Avenue option, the Fourth Avenue option will likely involve significantly larger thickness and lateral extent of recent deposit soils below the planned station and tunnel. The shoring piles as well as the piles/ground improvement for tunnel support will need to penetrate this thickness to reach and embed into the competent glacially overridden soils. From these considerations, it appears the shallow tunnel along Fifth Avenue will be preferable to Fourth Avenue from a geotechnical perspective.

Pg. 7. The FEIS should take this conclusion and associated detailed technical analysis into consideration.

V. Additional alternatives and mitigation measures should be included in the FEIS.

In addition to the mitigation measures identified above, the FEIS should include the following additional mitigation measures:

- The construction impacts in the CID neighborhood are significant. The FEIS should continue to study alternatives and methods to shorten the construction duration.
- Study alternatives in the FEIS that would retain full vehicular and pedestrian access to the Garage during construction and during long-term operations. Identify alternatives that would cause no net loss of Garage parking during long-term operations.
- Maintain continuous access during construction to the Weller Street Bridge. Install temporary sidewalks, pedestrian connections, and wayfinding to allow for free flow of pedestrians to the Garage and through the CID to the greatest extent possible during construction.

Union Station Associates, LLC

We look forward to working with Sound Transit to make the WSBLE a reality in the manner that minimizes impacts and results in the best outcomes for the community.

Sincerely, Peter A. Nitze

Kevin Daniels NSD, LLC Its Manager



HART CROWSER A DIVISION OF HALEY & ALDRICH 3131 Elliott Avenue Suite 600 Seattle, WA 98121 206.324.9530

MEMORANDUM

21 March 2022 File No. 0204806-000

- TO: Nitze-Stagen Peter Nitze
- FROM: Hart Crowser, a division of Haley & Aldrich Madan Karkee, Ph.D., P.E., P.Eng. Garry Horvitz, P.E., L.E.G.
- Subject: Geotechnical Engineering Considerations Review (Updated) ST3 Plans for New Light Rail Station Chinatown-International District Seattle, Washington

This memorandum summarizes the preliminary assessments of Hart Crowser, a division of Haley & Aldrich (HCHA), concerning the geotechnical engineering considerations for existing structures in relation to a new Chinatown-International District Light Rail Station (CID Station) currently being planned by Sound Transit as part of their ST3 plan, which includes development of the West Seattle and Ballard link extensions. The draft environmental impact study (EIS) for the West Seattle and Ballard Link Extensions, prepared by Sound Transit, indicates several options being considered for the CID Station. These options include shallow and deep tunnel station options under Fourth or Fifth Avenue. The shallow options are anticipated to be about 80 to 115 feet below existing grade, while the deep options are intended to be much deeper at about 180 to 190 feet below the roadway surface grade.

We prepared this memorandum for the exclusive use of Nitze-Stagen and their partners for specific application to geotechnical considerations related to proposed options for the CID Station. We completed the work based solely on the available existing historical borings, according to generally accepted geotechnical practices for work performed in the same or similar localities and related to the nature of this preliminary assessment, at the time the services were accomplished. We make no other warranty, express or implied.

For our preliminary assessments presented herein, we interpreted the subsurface conditions based on our review of existing information, consisting of explorations and soil samples at widely spaced discrete locations. The nature and extent of variations between explorations may not become evident until additional explorations are performed, or actual construction occurs. If variations are encountered, it may be necessary to reevaluate the conclusions and assessments presented in this memorandum.

Although the Sound Transit plan for the CID segment stretches from South Holgate Street to James Street, our review of the existing geotechnical information is limited to the area between Fourth Avenue South and Fifth Avenue South, from South Royal Brougham Way in the south, to South Jackson Street to the north. We understand the properties of interest that may be impacted are within this area and are referred to as the 'general area of interest' (Figure 1) in this memorandum.

Ground surface elevation (NAVD 88) is generally in the range of 40 to 50 feet in the north end (close to South Jackson Street) of the *general area of interest* and dips down to elevation of about 20 feet in the south end (close to Sough Royal Brougham Way).

Review of Existing Subsurface Information

We compiled and reviewed 76 existing historical borings that are considered relevant for the *general area of interest*. The list of borings and the borings compiled are included as Appendices A and B respectively. Approximate locations of these borings are shown on Figure 2. Based on our review of the compiled boring logs, we developed two generalized subsurface profiles along two north-south lines designated as A-A' (close to along Fourth Avenue) and B-B' (close to along Fifth Avenue) on Figure 2. Subsurface profiles along A-A' are on Figures 3A through 3G, and those along B-B' are on Figures 4A through 4H. Sectional profiles on Figures 3A through 3F, and 4A through 4G show the details for various segments along A-A' and B-B' respectively. The segments corresponding to these figure numbers are shown on Figure 2 (in green). Figures 3G and 4H show the overall sectional profiles along A-A' and B-B' respectively. In general, the subsurface soil conditions broadly consist of fill and recent deposits overlying competent glacially consolidated soils at depth. Approximate elevation of the top of glacial deposit is estimated to range from -40 to -85 feet along section A-A' (close to along Fourth Avenue). Along section B-B' (close to along Fifth Avenue), the elevation of the top of glacial deposit appears to be mostly in the range of -30 to -50 feet, although there may be local dips in the north to up to -90 feet elevation (Figures 4F and 4G).

FILL SOILS

The fill soils are generally located at ground surface of the site and extend to depths ranging from about 15 to 60 feet below ground surface. The fill is typically composed silty sand or sandy silt, but several borings show a combination of soil types in varying amounts including sands, silts, clays, and gravels. The fill soils also typically contain varying amounts of building debris (e.g., brick, wood, concrete, and asphalt), organics, roots, ash, coal, and other debris. The fill varies widely in density, ranging from loose/very soft to very dense/hard, but the majority of fill is generally loose/soft to medium dense/stiff, with standard penetration test blow counts ranging from 0 to 30. Based on our previous experience with projects in the area, debris including concrete, timber, timber piles, and steel may be present in the fill.

RECENT DEPOSITS

Underlying the fill soils, these soils are typically recently deposited native soils, up to approximately 80 feet in thickness. These recent deposits typically consist of silty sand, sandy silt, or silty clay with varying amounts of gravel, organics, peat, and shell fragments. Overall, the recent deposits consist of



very soft to soft silt and clay overlying generally medium dense sand with variable silt and gravel content. These soils are comprised of estuarine soils associated with former tide flats in the site vicinity and beach/marine deposits. These recent deposits are weak and highly compressible, and as such, are not capable of supporting large structural loads. As a result, all of the existing (and proposed) buildings in this area, including those developed by Nitze-Stagen, Vulcan, and Alexandria are or will be supported on deep foundation systems that extend down into firmer bearing soils at depth.

GLACIAL DEPOSITS

Glacially consolidated soils are encountered beneath the recent deposits and consist of dense to very dense sand and gravel with variable silt content and hard silt/clay with variable sand and gravel content. Deeper of the available borings we reviewed were terminated in this soil deposit. These glacial deposits represent a firm bearing layer for deep foundations that support the larger buildings in this area.

GROUNDWATER

Groundwater was encountered in some of the borings and shallow monitoring wells between 1.5 to 18 feet below existing grade. In general, groundwater in the area is present in a shallow, unconfined aquifer and a deep confined aquifer. Wells that were screened within the glacially overridden soils appear to have a piezometric surface near the ground surface. This indicates that the piezometric heads within the deep aquifer may be higher than those of the shallow aquifer.

Review of ST3 Alignments and Options

As noted above, Sound Transit is considering two basic alignments to construct the below grade light rail station along its CID segment, which includes the area from South Holgate Street to James Street. These two alignments consist of constructing the CID station under Fourth Avenue or Fifth Avenue. For both of these alignments, there are different options being considered for the segment that would enter a tunnel heading north between Fourth Avenue South and Sixth Avenue South. The new CID station will connect to the existing station under Fifth Avenue. Approximate layout plans of the various options are sketched on Figure 2.

FOURTH AVENUE OPTIONS

There are two options under evaluation for the CID station under Fourth Avenue with the station located approximately where South King Street crosses it, west of the existing station under Fifth Avenue.

Fourth Shallow Option

In this option, the station platform will be approximately 80 feet deep (elevation about -40 feet) and an underground connection will be made to the southbound platform of the existing station under Fifth Avenue. Schematic plans indicate that the light rail line tunnel will cross under the Salvation Army site, approximately from Fifth Avenue and South Brougham Way crossing, to align under Fourth Avenue, just



south of the Turner Construction building. Based on the subsurface conditions described above, the station and tunnel will generally be within the soft to medium stiff and loose to medium dense recent deposit soils. The thickness of the recent deposit below the planned station depth to the top of glacially overridden deposits is estimated to be in the range of 10 to 45 feet (Figures 3A through 3G). Approximate extent of the below grade Union Station parking is also shown on Figure 3G.

Fourth Deep Option

In this option, the tunnel and station will be approximately 190 feet deep (elevation about -150 feet). In the area where the station is planned, there will be approximately 70 feet of glacial soils above this depth (Figure 3G). To reach this depth, the tunnel will need to have a gradient from where it enters underground in the south. Figure 3G illustrates the possible vertical alignment of the tunnel south of the proposed station by showing 3 and 5 percent gradient lines. It seems the deep option is intended to allow the use of a tunnel boring machine possible, instead of the cut-and-cover method anticipated for the shallow option, to minimize disruptions during construction. Schematic plans indicate that the light rail line tunnel will align Fourth Avenue from south of the Salvation Army site.

FIFTH AVENUE OPTIONS

There are three possible options under evaluation for the CID station under Fifth Avenue, again with the station located approximately where the South King Street crosses it, but east of the existing station under Fifth Avenue.

Fifth Shallow Option

In this option, the station platform will be approximately 90 feet deep (elevation about -50 feet) and an underground connection will be made to the northbound platform of the existing station under Fifth Avenue. Schematic plans indicate that the tunnel would run north beneath Sixth Avenue, and then transition to Fifth Avenue near Seattle Boulevard South. Assuming the station and tunnel at about elevation -50 feet, the tunnel is anticipated to be on top of the glacially overridden soils (Figures 4A through 4E), except in the north where local dips may be encountered (Figures 4F and 4G). Locally, there may be up to about 30 feet of very soft to medium stiff and loose to medium dense recent deposit soils below the planned station depth to the top of glacially overridden deposits. Approximate extent of the below grade Union Station parking is illustrated on Figure 4H.

Fifth Shallow Diagonal Option

In this option, the station platform will be approximately 115 feet deep (elevation about -75 feet) and an underground connection will be made to the northbound platform of the existing station under Fifth Avenue. Similar to the shallow option described above, there may be up to about 50 feet of very soft to medium stiff and loose to medium dense recent deposit soils from the planned station depth to the top of glacially overridden deposits. In this option, the tunnel would continue north beneath Sixth Avenue and then transition to Fifth Avenue from north of South Jackson Street. The station will be diagonal between Sixth Avenue and Fifth Avenue approximately beneath South King Street. Considering the



schematic layout plan shown on Figure 2, this option is likely to have the least impact on properties within the general area of interest.

Fifth Deep Option

Similar to the Fifth Shallow Option above in alignment, except deeper tunnel and station. The tunnel and station will be about 180 feet deep (elevation -140 feet). In the area where the station is planned, there will be on the order of about 50 feet of glacial soils above this depth (Figure 4H). To reach this depth, the tunnel will need to have a gradient from where it enters underground in the south. Figure 3H illustrates the possible vertical alignment of the tunnel south of the proposed station by showing 3 and 5 percent gradient lines. As for the Fourth Avenue alignment, the deep option seems to be intended for making the use of tunnel boring machine possible, instead of the cut-and-cover method anticipated for the shallow option, to minimize disruptions during construction.

Considerations for Existing Properties

All of the building and parking structures between Fourth and Fifth Avenues are pile supported, and any new construction in the future (including the Salvation Army site) are expected to be either pile supported or supported on ground improvement. Assuming that all necessary and appropriate measures will be adopted during construction, the general impacts to the properties in the general area of interest can be divided into two categories: disruptions during construction and future development impacts. There will be numerous other direct and indirect impacts from such a large-scale construction undertaking (e.g., street closes, traffic rerouting, etc.), which are beyond the scope of this memorandum.

DISRUPTIONS DURING CONSTRUCTION

Actual disruptions and loss of use/revenue will be dependent on the actual sequence and mode of construction operation. It is anticipated that the three shallow options described above will involve cutand-cover methods. From general comparative basis, it appears that the Fifth Shallow Diagonal Option is likely to be least disruptive, while Fourth Shallow Option is likely to be most disruptive.

With respect to the Fourth Avenue Shallow Option, the most likely cut and cover scenario will need to include a shoring system that consists of a water-tight structure. This would include shoring walls most likely consisting of water-tight secant pile walls or slurry trench walls that extend down into the dense bearing soils at depth. Given the extreme depth to competent soils, the use of tieback anchors may be prohibitive. As a result, it is most likely that the shoring walls would be internally braced in a manner similar to that used for the South Approach and Launch Pit for the Alaskan Way Tunnel. The need to avoid dewatering of the excavation will be of primary significance, which will extend substantially below the water table. This is important because lowering of the water table outside of the shoring system would tend to cause ground surface subsidence and adverse impacts to the structural performance of all the buildings along Fourth Avenue.



Even when dewatering occurs inside of a watertight secant pile type shoring wall, there will be some influence on the outside as the groundwater is drawn down. One of the ways to minimize impact on the outside of the shoring wall is to embed the secant piles deeper into the glacial soils, to provide a cutoff wall below. Since available information described above indicates the presence of a deep aquifer that is confined with piezometric head closer to existing grades, installing secant piles deeper itself will involve some challenges.

Impacts to existing structures from a structural integrity perspective will depend on the means and methods adopted during construction, which can be assessed after the details become available. Some of the apparent considerations are itemized below.

- In the Fourth Shallow Option, the tunnel alignment seems to pass through the Salvation Army site. The cut-and-cover type of operation to construct the tunnel through the site is likely to be directly disruptive.
- For existing structures, the Union Station garage and building entrances along Fourth Avenue will likely be unusable for some extended period of time.
- The Fifth Shallow Option will likely have minimal direct impact on existing properties south of the Airport Way South, but garage and building entrances north of Airport Way South along the Fifth Avenue will likely be limited or unusable for some extended period of time.
- The Fifth Shallow Diagonal Option will likely have minimal direct impact on existing properties south of South King Street. As most of the general area of interest lies south of South King Street, this option appears to be least disruptive for properties in the general area of interest.
- Both deep options will likely see minimal disruption along the tunnel alignment, but there will be disruption at the station location areas.

FUTURE DEVELOPMENT IMPACTS

The station and tunnel construction is likely to alter the conditions for future development. Some of the apparent geotechnical considerations are itemized below.

- As noted above, all shallow options for station and tunnel will involve cut-and-cover type of construction approach. Since the station and tunnel will likely lie within the recent deposit soils, they will likely be supported on piles or ground improvement to transfer loads to the competent glacial soils. When construction occurs in properties adjacent to Fourth or Fifth Avenues in the future, the impact on the tunnel and station can be a significant consideration.
- In the Fourth Shallow Option, the tunnel will be directly under Salvation Army property. Any structure constructed on this site will need to transfer loads directly on the tunnel or bridge over the tunnel to transfer load below. Of course, any basement construction will be limited to above the top of the tunnel. For the Salvation Army development, we understand that the proposed building structure may occupy the entire site and will extend one story below the adjacent grade of Fourth Avenue. Any proposed building development on the site would require that the loads of the building are extended down below the invert of the tunnel such that overstressing of the tunnel itself is avoided. Alternatively, Sound Transit would need to design the tunnel to



accommodate the planned loads of the new buildings. This latter consideration is the approach taken by The Washington State Department of Transportation in the design of the Alaskan Way Tunnel through downtown Seattle.

• For deep options, one of the considerations will be the need to account for the extent of load transfer from building foundations to the tunnel and possible additional tunnel settlement from load transfer. Such considerations are likely to be more prominent as the tunnel subgrade rises up with distance from the deep station areas.

Comparative Geotechnical Considerations for Shallow Options (Fourth Avenue vs. Fifth Avenue)

As noted above, the shallow cut-and-cover construction along Fourth Avenue will likely be within the very soft to medium stiff and loose to medium dense recent deposit soils for the most part. Schematic subsurface profiles described herein indicate thickness of the recent deposit of 10 to 45 feet below the planned station depth to the top of glacially overridden deposit soils. This indicates that the tunnel and station will likely be either pile supported or supported on ground improvement to transfer to competent glacially overridden soils. It is also noted above that the shoring system for cut-and-cover construction will likely consist of water-tight secant pile walls embedded into the glacially overridden soils. The dewatering and deep depressurization that will be required along Fourth Avenue (shallow groundwater table) to make the required deep cuts may likely develop offsite impacts, such as ground surface subsidence, which could substantially and adversely impact the performance of the existing and proposed buildings along Fourth Avenue. In comparison, the station and tunnel at the proposed depth (elevation about -50 feet) along Fifth Avenue is anticipated to be within or on top of the glacially overridden soils for the most part, except in the north where local dips may be encountered (Figure 4G).

In comparison to the Fifth Avenue option, the Fourth Avenue option will likely involve significantly larger thickness and lateral extent of recent deposit soils below the planned station and tunnel. The shoring piles as well as the piles/ground improvement for tunnel support will need to penetrate this thickness to reach and embed into the competent glacially overridden soils. From these considerations, it appears the shallow tunnel along Fifth Avenue will be preferrable to Fourth Avenue from a geotechnical perspective.



Closing

We appreciate the opportunity to provide our assessment of the geotechnical engineering considerations for existing properties in relation to Sound Transit plans for the CID Light Rail station. Please do not hesitate to call if you have any questions or comments.

Attachments:

Figure 1 - Location Plan
Figure 2 - Boring Locations Plan
Figures 3A though 3F - Generalized Subsurface Profile A-A' Segments (Along Fourth Avenue)
Figure 3G - Generalized Subsurface Profile A-A' (Along Fourth Avenue)
Figures 4A though 4G - Generalized Subsurface Profile B-B' Segments (Along Fifth Avenue)
Figure 4H - Generalized Subsurface Profile B-B' (Along Fifth Avenue)

Appendix A - List of Borings Reviewed Appendix B - Boring Logs

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Select References

- 1. Hart Crowser, 1997. Geotechnical Engineering Design Study, Union Station Development, Seattle, Washington, Prepared for Nitze-Stagen & Company, Inc, July 9, 1997 (J-4761).
- 2. Hart Crowser, 1998. Geotechnical Engineering Design Study, Union Station Parking Garage, Seattle, Washington, Prepared for Nitze-Stagen & Company, Inc, July 31, 1998 (J-4937).
- 3. GeoEnginers, 2019. Geotechnical Master Use Permit Report, Salvation Army Site, 1000 4th Avenue South, Seattle, Washington, Prepared for ARE-Seattle No. 35, LLC, December 4, 2019.














NORTH

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SCALE IN FEET







NORTH







MARCH 2022

FIGURE 3F





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SOUTH

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SOUND TRANSIT CID REVIEW SEATTLE, WASHINGTON **CROSS SECTION B-B'** FIGURE 4G MARCH 2022



ORGANICS AND/OR PEAT CONTENT

- SCREEN INTERVAL



Advision Heley & Aldricht	
CROSS SECTION B-B' (CO	OMBINED)
MARCH 2022	FIGURE 4H

APPENDIX A List of Boring Logs Reviewed

LIST OF BORINGS REVIEWED

S. No.	Boring Designation	Original Boring No.	Date Drilled	Boring Depth (feet)	Location Elevation (feet)	Explotation Completed by
1	B-1-HC2019	B-1	6/26/2019	36.5	19.6	Hart Crowser
2	B-5-HC2019	B-5	6/26/2019	39	18.8	Hart Crowser
3	MW-3S-HC2019	MW-3S	6/25/2019	16.5	20.04	Hart Crowser
4	MW-3D-HC2019	MW-3D	6/24/2019	86.5	20.31	Hart Crowser
5	MW-1S-HC2019	MW-1S	6/20/2019	16.5	21.34	Hart Crowser
6	MW-2S-HC2019	MW-2S	6/20/2019	26.5	19.46	Hart Crowser
7	MW-1D-HC2019	MW-1D	6/19/2019	87	21.44	Hart Crowser
8	B-2-HC2019	B-2	6/17/2019	31.5	19.8	Hart Crowser
9	B-3-HC2019	В-3	6/17/2019	31.5	19.8	Hart Crowser
10	B-4-HC2019	B-4	6/17/2019	36.5	20.3	Hart Crowser
11	B-1-HC1998	B-1	3/2/1998	78.3	17.7	Hart Crowser
12	BP-1A-HC1987	BP-1A	6/26/1987	79	30	Hart Crowser
13	BP-2-HC1987	BP-2	6/23/1987	79	10.5	Hart Crowser
14	MWU-4-HC1987	MWU-4	5/11/1987	19		Hart Crowser
15	HC-8-1985	HC-8	12/3/1986	78.2	8.5	Hart Crowser
16	HC-7-1985	HC-7	12/2/1986	127.5	9	Hart Crowser
17	P-101-HC1985	P-101	11/13/1986	45.5		Hart Crowser
18	P-102-HC1985	P-102	11/13/1986	39.5		Hart Crowser
19	P-103-HC1985	P-103	11/13/1986	44		Hart Crowser
20	B-4-HC1985a	B-4	12/23/1985	69	37	Hart Crowser
21	B-5-HC1985a	B-5	12/23/1985	69	34	Hart Crowser
22	B-6-HC1985	В-6	12/23/1985	41	34	Hart Crowser
23	B-3-HC1985a	В-3	12/20/1985	69	35	Hart Crowser
24	HC-4-1985	HC-4	12/18/1985	103.5	8.1	Hart Crowser
25	B-2-HC1985a	B-2	12/18/1985	70	34	Hart Crowser
26	HC-5-1985	HC-5	12/16/1985	116.3	8.6	Hart Crowser
27	B-1-HC1985a	B-1	12/16/1985	70	35	Hart Crowser
28	HC-2-1985	HC-2	12/13/1985	93.9	8.2	Hart Crowser
29	HC-6-1985	HC-6	12/13/1985	93.5	9.3	Hart Crowser
30	HC-3-1985	HC-3	12/12/1985	93.4	8.2	Hart Crowser
31	HC-1-1985	HC-1	12/11/1985	102.8	9.7	Hart Crowser
32	B-110-HC1985	B-110	12/2/1985	103.2	9.3	Hart Crowser

S. No.	Boring Designation	Original Boring No.	Date Drilled	Boring Depth (feet)	Location Elevation (feet)	Explotation Completed by
33	B-117-HC1985	B-117	11/26/1985	93	10.1	Hart Crowser
34	B-111-HC1985	B-111	11/20/1985	73.3	9.2	Hart Crowser
35	B-112-HC1985	B-112	11/20/1985	79	9.8	Hart Crowser
36	B-113-HC1985	B-113	11/19/1985	73.5	10.2	Hart Crowser
37	B-114-HC1985	B-114	11/18/1985	92.8	11.2	Hart Crowser
38	B-115-HC1985	B-115	11/14/1985	73.3	10.3	Hart Crowser
39	B-116-HC1985	B-116	11/13/1985	84	10.5	Hart Crowser
40	B-118-HC1985	B-118	11/11/1985	73.4	10.3	Hart Crowser
41	B-119-HC1985	B-119	11/5/1985	83.4	9.9	Hart Crowser
42	B-120-HC1985	B-120	11/4/1985	74	10.7	Hart Crowser
43	P-2-HC1985	P-2	6/7/1985	65	7.52	Hart Crowser
44	B-16-HC1985	B-16	5/18/1985	108.5	9.4	Hart Crowser
45	B-13-HC1985	B-13	5/8/1985	78.9	7.64	Hart Crowser
46	B-19-HC1985	B-19	5/8/1985	62.5	10.77	Hart Crowser
47	B-15-HC1985	B-15	5/7/1985	88.3	9.41	Hart Crowser
48	P-1-HC1985	P-1	5/7/1985	67	7.2	Hart Crowser
49	P-3-HC1985	P-3	5/6/1985	72.2	9.69	Hart Crowser
50	B-18-HC1985	B-18	5/3/1985	94.3	9.44	Hart Crowser
51	B-1-HC1985b	B-1	1/11/1985	78	10.6	Hart Crowser
52	B-3-HC1985b	В-З	1/11/1985	78.9	10.3	Hart Crowser
53	B-2-HC1985b	B-2	1/9/1985	79	11.4	Hart Crowser
54	B-4-HC1985b	В-4	1/9/1985	88.3	10.8	Hart Crowser
55	B-8-HC1985	B-8	1/3/1985	86	10.9	Hart Crowser
56	B-5-HC1985b	B-5	12/21/1984	89	8.8	Hart Crowser
57	B-9-HC1977	В-9	3/3/1977	16.5	6.5	Hart Crowser
58	B-5-HC1977	B-5	2/24/1977	74	37	Hart Crowser
59	B-8-HC1977	В-8	2/17/1977	26.5	6.5	Hart Crowser
60	SD-117-SW2003	SD-117	9/5/2003	110.3	18.9	Shannon & Wilson
61	B-5-SW1992	B-5	3/12/1992	51.5	18.59	Shannon & Wilson
62	TB-93-SW1984	ТВ-93	12/14/1985	55.3	8.2	Shannon & Wilson
63	TB-80-SW1984	ТВ-80	9/24/1985	120.2	8.7	Shannon & Wilson
64	TB-81-SW1984	TB-81	9/12/1985	122.8	9.9	Shannon & Wilson
65	TB-78-SW1984	TB-78	9/10/1985	70	9.8	Shannon & Wilson

S. No.	Boring Designation	Original Boring No.	Date Drilled	Boring Depth (feet)	Location Elevation (feet)	Explotation Completed by
66	TB-79-SW1984	ТВ-79	9/6/1985	70.2	11.3	Shannon & Wilson
67	TB-82-SW1984	TB-82	9/4/1985	101.5	8.2	Shannon & Wilson
68	TB-3-SW1984	TB-3	10/12/1984	38	10	Shannon & Wilson
69	TB-25-SW1984	ТВ-25	10/11/1984	99.5	9.7	Shannon & Wilson
70	TB-22-SW1984	ТВ-22	9/13/1984	60	10	Shannon & Wilson
71	TB-1-SW1984	TB-1	8/1/1984	60.8	9.3	Shannon & Wilson
72	B-4-CWD1980	B-4	10/20/1980	54		ConverseWardDavisDixon
73	B-2-CWD1980	B-2	10/17/1980	79		ConverseWardDavisDixon
74	B-3-CWD1980	В-3	10/17/1980	69.5		ConverseWardDavisDixon
75	B-1-CWD1980	B-1	10/16/1980	79		ConverseWardDavisDixon
76	GC-18-GA2000	GC-18	7/27/2000	86.5	21	Golder Associates

APPENDIX B Boring Logs

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- 10 -	- 0 - 0 - 0	Han the second sec	18	Slight petroleum-li odor, sligh sheen	ike 0.4 ^{It}		Becomes FAT CLAY.				0					
- -ເດ - 15	-			<u>S-3</u>												-
- - L	- 0 - 0 - 0	<u>i</u>	18	Strong petroleum-li odor, no sheen	ike 3.0		Black layer at 16.5 feet.	ck layer at 16.5 feet.								- 15
- - 0 - 20		X ig	18	<u>S-4</u> Moderate petroleum-li	e ike 1.0		Becomes dark brown to bla	ck/gray, moist.								- 20
	- - -			odor, no sheen							0					-
- 25 -		Ä	18	<u>S-5</u> Slight petroleum-li odor, no	ike 0.6		Becomes dark brown with w	rood and shell fragments.			0					- 25
-10	-			Sileeii												
- 15	- 0 2 14 -	18in	18	<u>strong</u> petroleum-li odor, sligh sheen	ike 0.7 nt		SILTY SAND (SM), medium uniformly-graded sand, occa	n dense, black, moist, fine, asional shell fragments.				16				- 30
- 35 -	000	Aile I	18	<u>S-7</u> No odor, n sheen	0.6		FAT CLAY (CH), very soft,	gray-brown, moist.			0					- 35
-			18	<u>S-8</u> No odor, n	0.5		Becomes medium stiff.				·····					-
-2(5	- 14		sheen			Bottom of	Borehole at 39.0 feet.			5			L	L	ł
Gener 1. Ref 2. Mat unit 3. US0	al Note er to Fi terial de s. Das CS des	s: gure A script hed st ignatio	A-1 f ions tratu	for explana s and strat um lines in are based	ation of d um lines dicate gr on visua	lescrip are inf adual I-man	tions and symbols. erpretive and actual changes may or approximate change between ma Ial identification (ASTM D 2488) ur	be gradual. Solid stratum lines indica aterial strata or geologic units. lless otherwise supported by laborator	te distinct co ry testing (AS	ontac	t betwe D 2487	en mat 7).	erial sti	rata or (geologio	0
4. Gro	oundwa	er lev	el, i	f indicated	, is at tim Proiect	ne of d	rilling/excavation (ATD) or for date	specified. Level may vary with time.	Dorber				Elerer	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	•	_
	RTC	RO	W.	SER	Locatio Project	n: S No	Seattle, WA 19382-02		Boring	гоб 2	J		Shee	e et	A-0	י 1



Date Sta	arted:	6/24/	19			Date (Completed: 6/24/19	Drilling Contractor/Crew: _	lolt Services,	Inc.	/ Mitc	h & Aus	tin				_
Logged	by: <u>B.</u>	Dozi	er			Check	ed by: M. Goodman	Drilling Method: Hollow Ste	em Auger				N/N	חצ-/	-нс	2010	a
Ground	i: <u>IN: 2</u> Surface	19,97 9 Fler	r 1.2 Vatio	: <u>4 ⊏:1,27</u> on: 20 3	1,362.5 1 feet	4		Hammer Type: <u>Mobile B</u>	- <u>58 / Truck-m</u> mer	ount	ed dri	ıı rıg	14141	, 50			<u></u>
Horizont	al Datu	m: \	WA	State Pla	ne N, N	AD 83	, ft.	Hammer Weight (pounds):	140	Ha	mme	r Drop ⊦	leight (inches)	: 30		
Vertical	Datum	NA	VD	88				Measured Hammer Efficien	icy (%): <u>NA</u>			_					
Comme	nts: <u>N</u>	ell Ta	ag II	D: BMF-6	54 To	o of ca	sing elevation: 20.00 feet.	Hole Diameter:			ising I	Diamete	r:				
L								Total Depth: 86.5 feet		_ De	epth to	Ground	dwater	: <u>10 fee</u>	et		_
		5	Sam	ple Data		_					Ĺ						
eet)) 								Ictio						
on (f feet	nut		Iches			Log		Material		evel	Jstru						feet
evati pth (0 N	Verv	th (i	Niumele e		hic		escription		er L(Ö						pth (
De E	Blov	Type	Leng	Tests	(ppn	Gra (u				Wat	Wel	1	▲ S		alue	0	De
F8 0.			\top				¬ 3 inches of Asphalt.						-		-		0
╞	1										7 E						Γ
F	1																Γ
╞	1										80						Γ
F _	1																Ē _
-15	2	N. <u>.</u>	18	S-1 No odor	r, 0. 4	, [[]	GRAVELLY SILT WITH SA	ND (ML), very soft, black,	moist.	1							_ s
F	0	Н₫		slight she	en						81	1					L
F	1	H,		<u>S-2</u>			FAT CLAY (CH). verv soft			$\left \right $	88	Į]]			L
t i	0	Щġ	18	No odor, sheen	no 0.2			J J			86	┣,					L
- 10-		Ц								atd ⊻	86	<u> </u>					- 10
[]		Į į	18	No odor,	no 0.2		Becomes wet. Perched water at 10 feet					 					F
-		H.		sneen								0					F
Γ	_																F
Γ	_																F
15		\vdash		S-4													- 15
		X i	18	No odor,	no 0.4							 					F
L	-											0					F
L	- 8	<u>چ</u> ز [18	<u>S-5</u> No odor,	no 0.3					¥		1					F
L	- 0	Д₽		sheen						0:0		0					F
-0 20	- o	\exists		<u>S-6</u>						19 0							- 20
-		Ž į	18	No odor, sheen	no 0.4					28/20		••••••					┢
-	-									/9		1					F
-	-										80						F
╞	-																F
-ب ²⁵	- N	V .5	1.0	S-7	no 0 3			CAND fire could wood									- 25
┣	ŏ [Щ۴	יין: ואין	sheen			fragments.	SAIND, TINE Sand, Wood			8 P	r					Γ
F	1										86	1					Ē
ŀ	1										88						Ē
- 20]										88						
	0	, E	18	No odor,	no 0.5		Becomes FAT CLAY, soft,	gray-brown with white she	11			A					- 30
F	2	Ц÷		sheen			ragments, no wood.				88	2					L
F																	L
F											88]					F
ட ம 35		Ц		6.0								 					- 35
[7		Į į	18	No odor,	no 0.6		Becomes very soft, moist.			ATD ₽		.					F
[-	Π.		sneen							86	0					F
L	-										80						F
L	-										88]					┝
Genera	I Notes											1					<u> </u>
1. Refe	r to Fig	ure /	- 11	for explar	nation of	descr	iptions and symbols.										
2. Mate	2. Material descriptions and stratum lines are interpretive and actual changes may be gradual. Solid stratum lines indicate distinct contact between material strata or geologic units.																
3. USC	S desi	gnatio	ons	are based	d on visu	ial-ma	nual identification (ASTM D 2488) ur	nless otherwise supported by la	boratory testi	ng (/	ASTN	I D 2487	7).				
4. Grou	4. Groundwater level, if indicated, is at time of drilling/excavation (ATD) or for date specified. Level may vary with time.																
				I	Projec	:t:	SODO 4th Avenue	Т	Bo	orin	g Loo	3	ſ	Figur	e	A-1	1
	דר				Locati	on:	Seattle, WA		M	w	-3r)		Shee	t	1 of	3
<i>11/.</i> V	VU	NU I	772	כוואל	Projec	t NO.	19382-02		14			•		2	-		-









L BUR	HAI	TC	RC	N	ISER	Locati	on: t No.	Seattle, WA : 19382-02	Ň	/W	-1D	,)		Shee	t	1 of 3	3
				,		Projec	t:	SODO 4th Avenue		orin		n		Figur	e	۵-۵	2
	 Refe Mate units USC Grou 	r to Fiç rial de Dash S desi ndwat	gure scrij ned gna er le	A-1 otior stra tions evel,	for explan ns and stra tum lines ir s are based if indicated	ation of tum line ndicate g d on visu d, is at ti	descr s are i gradua ial-ma me of	iptions and symbols. interpretive and actual changes may be al or approximate change between mate anual identification (ASTM D 2488) unle drilling/excavation (ATD) or for date sp	e gradual. Solid stratum lines indicate dist erial strata or geologic units. ess otherwise supported by laboratory test pecified. Level may vary with time.	tinct o	contac ASTM	t betwe D 2487	en mat 7).	erial str	ata or (geologic	;
	Genera		5 :					SILIT SAND (SIVI), IOOSE, DAIK	שוטשוויטומכא, חוטוגו, ווחפ sano.				10				-
	35 -	0	X	18	<u>S-13</u> No odor, slight sheen	0.9			brown/black moist fine cand					•••••	· · · · · · · · · · · · · · · · · · ·		- - 35
	30 -	000000000000000000000000000000000000000	X	18	<u>S-12</u> No odor, no sheen	0.8		Becomes very soft, dark brown wood debris from 30 to 31.5 fer	n, with white shell fragments and et.			0					- 30 - -
	· · ·	1 2 1 2 0		18	Slight sheen <u>S-11</u> No odor, no sheen	0.8		wood debris. Becomes FAT CLAY, no wood Gravel lens.	debris.			2 ▲ 2	· · · · · · · · · · · ·	• • • • • • • • •	• • • • • • • • • •		-
	25 -			18	<u>S-9</u> No odor, slight sheen <u>S-10</u> No odor	0.3		SILTY SAND WITH GRAVEL (SM), loose, gray, wet.	-		··· 7					- - 25
	20 -	002	X	18	<u>S-8</u> No odor, no sheen	0.5		FAT CLAY WITH GRAVEL (CH	H), soft, gray, wet.	-		2					- 20 - -
	ר י י	1 1 0		18	<u>S-7</u> No odor, heavy sheer	0.3						2 1					-
	15-		X	18 18	No odor, heavy sheer <u>S-6</u> No odor,	0.4			AVEE WITT OLET, gray.			▲ 2					- 15 -
	10- 2			18	<u>S-4</u> No odor, moderate sheen <u>S-5</u>	0.4		WELL-GRADED GRAVEL WIT very loose, brown, wet. Perched water at 10 feet. Becomes WELL-GRADED GR	TH SILT AND SAND (GW-GM),	·¥		2					10
	-	6 5 3	X	18	<u>S-3</u> No odor, no sheen	0.2		GRAVELLY SILT (ML), mediur	n stiff, brown, moist.	ATD							-
	5-	6 34 3		18	<u>S-2</u> No odor, no sheen	0.3		SILTY SAND WITH GRAVEL (SM), loose, brown, moist.	Ţ			- 14				- - 5 -
-8	0- 0 1	6		10	<u>S-1</u> No odor	0.3		ר 3 inches of Asphalt. SILTY SAND (SM), trace grave iron-oxide staining, wood debris	el, medium dense, brown, moist, s. [FILL]	3/28/2019							
[]	Depth (feet)	Blow Count	Type	Length (inches)	<u>Number</u> Tests	PID (ppm)	Graphic Log	Ma Desc	terial cription	Water Level	Well Construction	1	▲ S 0 2	PT N V 0 3	alue	0	Depth (feet)
	ommer			San	nple Data				Total Depth: 87 feet	_ 0a _ De	pth to	Ground	dwater:	<u>10 fee</u>	et		
F V	lorizont ertical I	al Datu Datum	ım: : <u>N</u>		A State Plan D 88	ne N, N/	AD 83	, ft.	Hammer Weight (pounds): <u>140</u> Measured Hammer Efficiency (%): <u>NA</u>	_ Ha	mmei	r Drop H	leight (nches)	: <u>30</u>		
L	ogged I ocation Ground S	oy: <u>B.</u> : <u>N: 2</u> Surfac	<u>Do:</u> 20,2 e El	zier 222. evat	08 E: 1,27	'1,439.73 4 feet	Checł 3	ked by: M. Goodman	Drilling Method: <u>Hollow Stem Auger</u> Rig Model/Type: <u>Mobile B-58 / Truck-m</u> Hammer Type: Auto-hammer	ount	ed dri	ll rig	MV	/-1D	-HC	201	9
	Date Started: 6/18/19 Date Completed: 6/19/19 Drilling Contractor/Crew: Holt Services, Inc. / Mitch & Austin Logged by: B. Dozier Checked by: M. Goodman Drilling Method: Hollow Stem Auger																





Da	te Star	ted: <u>6</u>	6/17/	/19			Date (Completed: <u>6/17/19</u> Drilling Contractor/Crew: <u>H</u>	lolt Services, Inc. / I	Mitc	h & Aus	tin	-			
Logged by: B. Dozier Checked by: M. Goodman Drilling Method: Hollow Stem Auger Location: N: 220,025.08 E: 1,271,588.35 Rig Model/Type: Mobile B-58 / Truck-model Ground Surface Elevation: 19.8 feet Hammer Type: Auto-hammer													B-:	2-HC	C201	19
G	cation:	<u>N: 22</u>	20,02 Elev	25.0 Vati	<u>J8 E: 1,2/1</u> ion: 19.8 f	,588.3	5	Hammer Type: <u>Mobile B</u>	<u>·58 / Truck-mounted</u> ner	a ari	i rig					
Ho	rizonta	al Datu	m: \	WA	State Plan	e N. N/	AD 83	. ft. Hammer Weight (pounds):	140 Ham	me	Drop H	leiaht (inches):	30		-
Ve	rtical D	atum:	NA	VD	88	•••,••		Measured Hammer Efficien	cy (%): NA							_
Co	mmen	ts:						Hole Diameter:	Casi	ing [— Diamete	r: <u>NA</u>				
_								Total Depth: 31.5 feet	Dept	th to	Groun	dwater:	5 feet			_
			S	am	ple Data											
f																
(fee	et)	Ħ		les)			bg	Material		<u>–</u>						et)
atior	h (fe			(incl			ic L	Description		Lev						h (fe
leve	Jept	MO	be	ngth	Number	PID	aph			ater		≜ S	PT N V	alue		Dept
Ľ	0-		₽	٤	Tests	(ppm)	Ō			≥	1	0 2	0 3) 4(D	0-
F	_	4						SILTY SAND (SM) medium dense dark brown moist	/							-
F	-	4			S-1			plastic fragments. [FILL]	Drick and							-
F	-	4	$\forall $		Slight	0.0										-
_F	-	11	ДΙ	10	odor, slight	0.0							21			-
- ^{- KZ}	5 —	2	Ш		<u>S-2</u>					ATD ⊈						- 5
- -	_	3	XII	18 p	betroleum-like	0.6		Perched water at 5 feet.	tea.			.				-
- F	-	l '	Η		odor, moderate							10				⊢
2820	-	0		10	sheen <u>S-3</u>	07		FAT CLAY (CH), soft, gray, moist.		1						-
- 19	-	2	Д	10	No odor, no sheen	0.7					2					-
	10 -				S-4			diash an dhara. Daamaa ar a t								- 10
ž-	-	ļŏ	XII	18	No odor,	0.7		1-Inch sand lens. Becomes very soft.			.					-
5	_	Ori M: 200,005,005,121,021,006,03 off Window Yue Ministry Park Autobases off Window Yue Ministret off Window									0					-
<u>-</u>	-	0 0		10	<u>S-5</u> No odor, po	0.6										-
	-	ŏ	ДΙ	10	sheen	0.0					0					-
<u>о</u> -0	15 —				5-6			Deserves		₽Ţ₽						- 15
	-	ğ	XII	18	No odor,	1.0		Becomes wet. Perched water at 15 feet.			.					-
	-		ΠI		Silgrit Srieeri						0					-
EA-	_	Ŋ	∇	10	<u>S-7</u> No odor no	٥٩										-
<u> </u>	-	ŏ	ЩΙ	10	sheen	0.5				1	0					-
-0	20 —	0	$\left \right $		<u>S-8</u>			December maint								- 20
AH-	-	Ŏ	ХI	18	Plastic-like odor, slight	1.3		Decomes moist.		4	.					-
<u> </u>	-				sheen						0					-
⊼_ ≻	-	0	∇	18	<u>S-9</u> No odor	11		Becomes FAT CLAY WITH SAND.								-
<u>-</u>	-	Ō	41		slight sheen					-	0					-
ဦ-မု	25 —	0	HI		S-10			Recomes FAT CLAX, gray brown								- 25
	_	Ŏ	МI	18	No odor, no sheen	0.7		becomes TAT CLAT, gray-blown.		4	.					-
	-										0					-
	-	0	\mathbb{M}	18	<u>S-11</u> No odor, no	0.6										-
1938	-	Ō	4		sheen						0					- I
ST-1-	30 —	0	HI		<u>S-12</u>			White shell fragments								- 30
д Д	-	0	МĽ	18	No odor, no sheen	1.1				Ľ	• · · · · · ·					-
	-		-					Bottom of Borehole at 31.5 feet.			0					-
	-	1														-
5 14	-	1														-
	35 —	35 —														- 35
	-	1														-
'n	-	1														-
	-	1														- I
HAH	-	1														-
	. Refer	to Fig	ure /	A-1	for explana	tion of	descr	iptions and symbols.	indiaata diatinat aa	nto	t botwo		arial atr			
	units.	Dash	ed s	trat	um lines ind	dicate c	s are gradua	al or approximate change between material strata or geologic units.	s indicate distinct co	ntac	t detwe	en mat	eriai str	ata or g	leologic	;
- - - 3	USCS	6 desig	natio	ons	are based	on visu	ial-ma	unual identification (ASTM D 2488) unless otherwise supported by la	boratory testing (AS	STM	D 2487	').				
	. Grour	lawate	er Iev	vel,	II Indicated,	, is at ti	me of	urining/excavation (AID) or for date specified. Level may vary with	ume.			;				
5NL					I	Projec	:t:	SODO 4th Avenue	Boring	Loc	J		Figur	е	A- 3	3
		·T				_ocati	on:	Seattle, WA	R_	`			Shee	t	1 of 1	1 I
PF	1AR		(U)	7	эн к	rojec	t No.	: 19382-02	D"4	-			Chee			•

Date Star Logged b Location: Ground S Horizonta Vertical C	rted: _ by: <u>B.</u> <u>N: 2</u> Surface al Datu Datum	6/17/ <u>Doz</u> 19,99 e Ele im:	/19 <u>:ier</u> 90. 90. 201 201 201 201 201 201 201 201 201 201	78 E: 1,271 ion: <u>19.8 1</u> A State Plan) 88	,623.9 ieet e N, N/	Date C Check 7 AD 83,	ompleted: 6/17/19 Drilling Contractor/Crew: ed by: M. Goodman Drilling Method: Hollow Big Model/Type: Mobile Hammer Type: Auto-ha ft. Hammer Weight (pound: Measured Hammer Effic	Drilling Contractor/Crew: Holt Services, Inc. / Mitch & Austin Drilling Method: Hollow Stem Auger Rig Model/Type: Mobile B-58 / Truck-mounted drill rig Hammer Type: Auto-hammer Hammer Weight (pounds): 140 Heasured Hammer Efficiency (%): NA Hole Diameter: Casing Diameter:							19
Commen	ts:		.,,				Hole Diameter: Total Depth: 31.5 feet	C	asing Di epth to (- amete Ground	r: <u>NA</u> dwater:	Not Ic	lentified	1	
Elevation (feet)	Blow Count	Type	Length (inches)	nple Data <u>Number</u> Tests	PID (ppm)	Graphic Log	Material Description			1	▲ S 0 2	PT N V 0 3	alue 0 4	0	Depth (feet)
 	-						Drilled to 20 feet.			· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·		- 5
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											· · · · · · · · · · · · · · · · · · ·				- - - - - - -
- 0 ₂₀ - 		X	18 18	<u>S-1</u> Slight odor, no sheen <u>S-2</u> No odor, no	1.4		FAT CLAY (CH), very soft, gray-brown, moist.			······					- 20
-			18 18	<u>S-3</u> No odor, no sheen <u>S-4</u> No odor, no	0.7		Becomes dark gray. White shell fragments from 25 t	to 26.5 feet.) 	· · · · · · · · · · · · · · · · · · ·				25
- ⁻			18	Siecen Siecen No odor, no sheen	0.7		Bottom of Borehole at 31.5 feet.))	· · · · · · · · · · · · · · · · · · ·				
 															- 35 - - -
General 1. Refer 2. Mater units. 3. USCS 4. Grour	Notes to Fig rial de Dash S desig ndwate	s: jure , scrip ned s gnati er lev	A-1 otior strat ions vel,	for explanations and stratu turn lines indi- s are based if indicated	ation of um line dicate g on visu , is at ti	descri s are i gradua ial-ma me of	ptions and symbols. tterpretive and actual changes may be gradual. Solid stratum lin l or approximate change between material strata or geologic uni nual identification (ASTM D 2488) unless otherwise supported by drilling/excavation (ATD) or for date specified. Level may vary w	nes indicate distinct ts. y laboratory testing ith time.	contact (ASTM [betwe D 2487	en mat ').	erial str	rata or g	geologi	0
E HAR	TCI	RO	W	SER	Projec Locati Projec	et: on: et No.	SODO 4th Avenue Seattle, WA 19382-02	Borir	ng Log 3-3			Figur Shee	re et	A- 2	ļ 1

	E Har	RTC	RO	N	ISER	Projec Locati Projec	et: on: et No.	SODO 4th Avenue Seattle, WA : 19382-02	В	oring I B-4	Log I	I		Figur Shee	e t	A-5	j 1
1 2 3 4	. Refer . Mate units. . USCS . Grou	r to Fig rial de Dash S desi ndwat	gure scrip ned s gnat er le	A-1 otior strations ions evel,	for explana ns and strat tum lines in s are based if indicated	ation of um line dicate g on visu , is at ti	descr s are gradua Jal-ma ime of	iptions and symbols. interpretive and actual changes may be al or approximate change between mate nual identification (ASTM D 2488) unles drilling/excavation (ATD) or for date spe	gradual. Solid stratum lines indicate dist rial strata or geologic units. s otherwise supported by laboratory test scified. Level may vary with time.	inct cor ing (AS	ntac STM	t betwe D 2487	en mat 7).	erial str	ata or g	geologia	;
10																-	
-15	- 35	000	X	18	<u>S-14</u> No odor, no sheen	1.1		Bottom of Bo	rehole at 36.5 feet.			0					- 35 _ _
	- 25	0	Å	18	No odor, slight sheen	1.1						0					- 25
_	-			10	<u>S-13</u>	0.0						0					Ē
- 	- 30 –	0		10	Sheen	0.6						0					-30
_	-	0		18	<u>S-11</u> No odor, no	1.1		Becomes gray-brown. White sh	ell fragments from 27.5 to 32.5 fee	et.		0					- -
ې ب	25 -	000	X	18	<u>S-10</u> No odor, no sheen	1.2		Becomes dark brown.									- 25 -
-	-	000	X	18	<u>S-9</u> Organic-like odor, no sheen	0.9		Becomes black, moist.				0					
-0	20 -	000	X	18	<u>S-8</u> Slight petroleum-like odor, slight	0.8						0					- 20 -
Ē	-	000	X	18	<u>S-7</u> Petroleum-like odor, slight sheen	0.8						0					-
- 2	-		X	18	<u>S-6</u> No odor, no sheen	1.2		Becomes wet. Perched water at 15 feet.	comes wet. rched water at 15 feet.				· · · · · · · · ·				- -
╞	- - 15		X	18	No odor, slight sheen	0.6											- 15
	-	Ŏ	X	18	No odor, no sheen	0.5						0					-
	- 10 -		Å	18	No odor, no sheen S-4	0.5						0			· · · · · · · · · · · · · · · · · · ·		- 10
╞	-		Å	18	No odor, no sheen	0.3		Becomes very soft				≜ 2					Ē
15	- 5 -	5		18	slight sheen	1.1		FAT CLAY (CH), soft, grav, moi					13				- - 5
-	-	4	M		<u>S-1</u>			SANDY SILT (ML), stiff, dark br	own, moist.				· · · · · · · · · · · · · · · · · · ·				
20 Elevation	O Depth (fee	Blow Count	Type	Length (inche	<u>Number</u> Tests	PID (ppm)	Graphic Lo	De	scription		Water Leve	1	▲ S 0 2	PT N V 0 3	alue 0 4	0	ې Depth (fee
feet)	()			Sam	nple Data			Λ	lataria l								t)
Сс —	ommen	its:							Hole Diameter: Total Depth: 36.5 feet	_ Casii _ Dept	ng E h to	Diamete Groun	er: <u>NA</u> dwater:	<u>15 fee</u>	et		
Gr Ho Ve	ound S prizonta ertical E	Surfac al Datu Datum	e El∉ µm: : N/	evat <u>W</u> A AVE	ion: <u>20.3 ·</u> A State Plar) 88	feet ie N, N	AD 83	, ft.	Hammer Type: <u>Auto-hammer</u> Hammer Weight (pounds): <u>140</u> Measured Hammer Efficiency (%): NA	_ Ham	mer	Drop H	Height (inches)	30		
Lo Lo	gged b cation:	oy: <u>B.</u> : <u>N: 2</u>	Doz 19,9	zier 968.	39 E: 1,27 [.]	1,624.9	Checł 3	ked by: M. Goodman	Drilling Method: <u>Hollow Stem Auger</u> Rig Model/Type: <u>Mobile B-58 / Truck-m</u>	iounted	l dril	l rig		B-4	4-HC	201	9
Da	ate Sta	rted:	6/17	7/19			Date	Completed: <u>6/17/19</u>	Drilling Contractor/Crew: Holt Services,	Inc. / N	Vitcl	n & Aus	stin				
B-1-HC1998



I. Refer to Figure 1 for explanation of descriptions and symbols.

Soil descriptions and stratum lines are interpretive and actual changes may be gradual.
Ground water level, if indicated, is at time of drilling

(ATD) or for date specified. Level may vary with time.

HARTCROWSER 3/98 J-4937 1/2 Figure A-2

B-1-HC1998

3/98

2/2

J-4937

Figure A-2



2. Soil descriptions and stratum lines are interpretive and actual changes may be gradual. 3. Ground water level, if indicated, is at time of drilling

(ATD) or for date specified. Level may vary with time.

Boring Log BP-1A

BP-1A-HC1987



 Soil descriptions and stratum lines are interpretive and actual changes may be gradual.

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pepe

and actual changes may be gradual. 3. Ground water level, if indicated, is at time of drilling (ATD) or for date specified. Level may vary with time. HARTCROWSER J-4937 7/98 J-1635-05 6/87 Figure A-3 1/2

Boring Log BP-1A



- 1. Refer to Figure A-1 for explanation of descriptions and symbols.
- 2. Soil descriptions and stratum lines are interpretive and actual changes may be gradual.

1

109

ocad

3. Ground water level, if indicated, is at time of drilling (ATD) or for date specified. Level may vary with time. HARTCROWSER 7/98 J-4937 6/87 J-1635-05 2/2 Figure A-3

BP-1A-HC1987

BP-2-HC1987



- Refer to Figure A-1 for explanation of descriptions and symbols.
 Self descriptions and stratum lines are interpretive.
- Soil descriptions and stratum lines are interpretive and actual changes may be gradual.

u

60

acod

3. Ground water level, if indicated, is at time of drilling (ATD) or for date specified. Level may vary with time. **HARTCROWSER** J-4937 7/98 J-1635-05 6/87 Figure A-4 1/2

BP-2-HC1987

7/98

6/87

2/2

J-4937

J-1635-05

Figure A-4



2. Soil descriptions and stratum lines are interpretive

H

601

acod

and actual changes may be gradual. 3. Ground water level, if indicated, is at time of drilling (ATD) or for date specified. Level may vary with time.

Boring Log MWU-4

1.0

1.0

MWU-4-HC1987





Sheet 1 of 2 Figure A-9

HC-8-1985





Sheet 1 of 3

Figure A-8







S&W 0003756





S&W 0003757

P-102-HC1985



Probe Log P-103

SOIL INTERPRETATION

No.



17 m 28











B-3-HC1985a



B-3-HC1985a SOIL DESCRIPTIONS STANDARD PENETRATION LAB TESTS RESISTANCE Ground Surface Elevation in Feat 35 (City Datus) in Feat Sample A Blows per Foot 60 Loose, wet, gray, silty, fine SAND with shell fragments. 5-18 X 65 Dense, wet. grey. slightly gravelly. slightly silty SAND. 5-17 X Bottom of Boring at 69.0 Feet. Completed 12/20/85. 70 75 80 85 90 95 100 105 110 115 . 120 Water Content in Percent Refer to Figure A-i for explanation of descriptions and symbols. Soil descriptions and stratum lines are interpretive and actual changes may be gradual. Ground water level, if indicated, is at time of drilling (ATD) or for date specified. Level may vary with time. J-1601-01 December 1985 HART-CROWSER & associates, inc. Sheet 2 of 2 Figure A-12 C High blow count due to concrete fragment in tip of sampler.





B-2-HC1985







SOIL DESCRIPTIONS



HC-5-1985

SOIL DESCRIPTIONS

B-1-HC1985a





SOIL DESCRIPTIONS STANDARD PERTATION Results brown, silty SAND. (FILL) Loose, wet. grey, slightly gravelly. Very slith of centrol brick and vody fragments. (FILL) Strong chemical odor noted between 7 and 14 feet. Strong chemical odor noted between 7 and 14 feet. Strong chemical odor noted between 7 and 14 feet. Server and roots Strong chemical odor noted between 7 and 14 feet. Server Strong chemical odor noted between 7 and 14 feet. Server Strong chemical odor noted between 7 and 14 feet. Server Strong chemical odor noted between 7 and 14 feet. Server Server Strong chemical odor noted between 7 and 14 feet. Server Se				HC-2-1985
Percent Surface Elevation in Feet B.2(city Detud) In Feet B.2(city Detud) Sample Allow per Foot Moist, Drown, silty SAND. (FILL) 0 0 0 0 Loose, wet, grey, silty Greetland 9-1 9-1 9-1 9-1 Strong chesical odor noted between 9-2 9-3 9-1 9-1 - Strong chesical odor noted between 9-5 9-3 9-4 9-1 - Strong chesical odor noted between 9-5 9-5 9-5 9-6 - Strong chesical odor noted between 9-5 9-7 9-7 9-7 - Strong chesical odor noted between 9-6 9-7 9-7 9-7 - Strong chesical odor noted between 9-7 9-7 9-7 9-7 - Strong chesical odor noted between 9-7 9-7 9-7 9-7 - Strong chesical odor noted between 9-7 9-7 9-7 9-7 9-7 - Strong chesical odor noted between 9-7 9-7 9-7 9-7 9-7 - Strong chesical odor noted between 9-7 9-7 9-7 9-7 9-7 - Strong chesical odor noted between	DIL DESCRIPTIONS	Ranth A	STANDARD PENETRATION RESISTANCE	LAB TESTS
Moist, brown, silty SAND. (FILL) Loses, Tet, grey, sliphty gravelly, slipy SLIY SAND and addim stifue wood fregments. (FILL) - Strong chesical odor noted between 7 and 14 feet. - Strong chesical odor noted between - Strong chesical odor noted	ound Surface Elevation in Feat 8.2(City Datu	in Feet I Sample	A Blows per Foot	100
Loose, wet, gray, slightly gravelly, very slity SAND and medium stiff, slity CLAW with occasional Drick and wood fragments. (FILL) - Strong chemical ador noted between 7 and 14 feet. - Strong chemical ador noted between - Strong chemical ador noted between 7 and 14 feet. - Strong chemical ador noted between - Stron	loist, brown, silty SAND. (FILL)			
- Strong chemical odor noted between 7 and 14 feet. 10 10 10 3-3 3-4 4 5 5 5 5 5 5 5 5 5 5 5 5 5	oose, wat, gray, slightly gravelly, ery silty SAND and medium stiff. ilty CLAY with occasional brick and ood fragments. (FILL)	5 -1 X -1		
Very soft to soft, wet, gray-brown. clayey Sill with scattered shalls and roots. Jense, wet, gray, silty, fine to sedum SAND with occasional shells ind roots Jense, wet, gray, silty, fine to sedum SAND with occasional shells ind roots Jense, wet, gray, silty, fine to sedum SAND with occasional shells ind roots Jense, wet, gray, silty, fine to sedum SAND with occasional shells ind roots Jense, wet, gray, silty, fine to sedum SAND with occasional shells ind roots Jense, wet, gray, silty, fine to sedum SAND with occasional shells Jense to medium dense, wet, gray, Lightly silty, gravelly SAND.	Strong chemical odor noted between 7 and 14 feet.	S-3 5-4 5-5		
Very soft to soft, wet, gray-brown, Clayey SILT with scattered shells and roots. Jense, wet, gray, silty, fine to sedium SAND with occasional shells ind roots lense to medium dense, wet, gray. lightly silty, gravelly SAND. Hense to medium dense, wet, gray. lightly silty, gravelly SAND. Hense to medium dense, wet, gray. Lightly silty, gravelly SAND.	34.	F. A	- NIIII	
Very soft to soft. wet. gray-brown. clayey SLLT with scattered shells and roots. Dense. wet. gray. silty. fine to sedium SAND with occasional shells ind roots Dense to medium dense, wet. gray. Dense to medium dense, wet. gray. Dense to medium dense, wet. gray. Hightly silty. gravelly SAND. 45	2 <i>1</i> 2	5−6 5−7		
AL and roots. Jense. wet. gray. silty. fine to redum SAND with occasional shalls ind roots ense to medium dense. wet. gray. lightly silty. gravelly SAND. 45	ary soft to soft, wet, gray-brown, layey SILT with scattered shells	± 20 5-8		
Pense. wet. gray. silty. fine to redium SAND with occasional shells nd roots ense to medium dense. wet. gray. lightly silty. gravelly SAND. 45	id roots.	- 25 - 5-9 - 30		- 44
ense to medium dense. wet. gray.	nse. wet. gray. silty. fine to	S-10		
ense to medium dense. wet. gray. lightly silty. gravelly SAND. 45	d roots	5-11 40		
	nsa to medium dense, wet, gray. ightly silty, gravelly SAND.	- 5-12 - 45		8
		50 S-13		
		- S-14		1
11ff. wet. brown PEAT.	ff. wat, brown PEAT.	S-15		, 196
Water Content in Percent		1-46	Water Content in Percent	0 4005
			-CAUMSER & accord	iates inc
Sheet 1 of 2 Figure 4-2		Shee	at 1 of 2 Figure /	1-3







HC-3-1985




Boring Log HC-1



Boring Log HC-1

HC-1-1985



Boring Log 8-110.

SOIL DESCRIPTIONS



LAB

Very soft to soft, wet. gray. clayey SILT to silty CLAY interspersed with loose, wet. gray. silty SAND. (CLAY/SAND FILL)	avit/116	8-1	•	
	10	s-2	•	-65
	10	s-3	<u> </u>	
	- 20	5-4 P 5-5	A	
Very soft to soft, wet, gray-brown, slightly fine sandy, clayey SILT with scattered shell fragments. (SILT I)	- 25	S-6 P S-7 2		
	30	8-8 P 45-9		
Loose, wet, gray, very silty, fine SAND with abundant shell fragments. (SAND T)	35	5-10 P- 5-11 -	•	-65
Y.O foot heave at 37.5 feet. Dense, wet, gray, silty, very sendy SRAVEL with scattered shellfragments/ Very dense, wet, gray, fine to medium SAND. (Dense SAND)	40	5-12 A- B-	•	
2.0 feet of heave at 42.5 feet.	45	8-13	•	-
3.5 feet of heave at 47.5 feet.	50	8-14	•	
4.0 feat of heave at 52.5 feat.	55	S-15	•	
1.5 feet of heave at 57.5 feet.	E	8-16		
		J-712-50	Decembe	iates inc

Depth

S&W 0003710

Sheet 1 of 2 Figure A-47

Boring Log B-140.

SOIL DESCRIPTIONS



S&W 0003711

B-110-HC1985

B-117-HC1985





B-111-HC1985

	in Feet	Sample A Blows p	Foot	ILaia
pose, wet. mottled gray-brown. andy GRAVEL with cinders. SAND FILL) ery soft. wet. gray. clayay SILT to ilty CLAY interspersed with loose. let. gray. silty SAND. (CLAY/SAND FILL)		S-1		-
	- 10 - 15	5-3 5-4		-65
	20	S-5 P \ S-6		₽₽ <0.25 .10- .20 .10- .20
ery soft to soft. wet. gray-brown. layey SILT with scattered shell ragments. SILT I)	- 25	S8		
edium dense, wat. gray, silty SAND ith scattered shell fragments. (SAND I) fery dense, wet. gray. slightly ilty. fine to medium SAND with	- 35	S-9 P S-10 S-11 S-11		50.
cattered thin lenses of fine sandy ILT. (Dense SAND) 1.0 feet of heave at 42.5 feet.	- 40	5-12	•	
2.0 feet of heave at 47.5 feet.	- 50	S-13		
3.0 feet of heave at 52.5 feet. 3.5 feet of heave at 57.5 feet.	55	S-14		. <u>81</u> 11.

STANDARD PENETRATION RESISTANCE SOIL DESCRIPTIONS LAB Depth in Feet T 60 A Blows per Foot Ground Surface Elevation in Feat 9.2 Sample Very dense, wet, gray, slightly silty, fine to medium SAND with scattered thin lenses of fine sandy SILT. (Dense SAND) 50 S-15 X 65 50 KS-17 70 Gravelly 4 5-18 X Bottom of Boring at 73.3 Feet. Completed 11/20/86. 75 10 65 90 95 100 105 110 115 120 Water Content in Percent Refer to Figure A-i for explanation of descriptions and symbols.
Soil descriptions and stratum lines are interprative and actual changes may be graduel.
Ground water level, if indicated, is at time of drilling (ATD) or for date specified. Level may very with time. J-712-50 November 1985 HART-CROWSER & associates, inc. Sheet 2 of 2 Figure A-48

S&W 0003713

B-111-HC1985

B-112-HC1985



SOIL DESCRIPTIONS

B-112-HC1985 STANDARD PENETRATION RESISTANCE LAB TESTS A Blows per Foot



Boring Log Badda





S&W 0003717

1



S&W 0003718

Sheet 1 of 2 Figure A-51



A0141 AAAA71A

B-115-HC1985





S&W 0003721

14

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B-116-HC1985





B-118-HC1985





B-119-HC1985



core/\4937\Log B119

Figure A-7 1/2



B-120-HC1985



core/\4937\Log B120

B-120-HC1985 LAB TESTS STANDARD PENETRATION SOIL DESCRIPTIONS RESISTANCE Depth in Fest A Blows per Foot Sample Ground Surface Elevation in Feat 10.7 60 Very dense. wet. gray. slightly silty to silty. fine to medium SAND. (Dense SAND) 5-16 65 79 11* -65 5-17X - Very silty. fine SAND. 70 5-18 X Bottom of Boring at 74.0 Feet. Completed 11/4/85. 75 Note: Groundwater level not observed due to use of drilling fluid in auger. See text for interpreted groundwater levels 80 85 90 95 100 105 110 core/\4937\Log B120 115 L 120 @ Water Content in Percant Refer to Figure A-i for explanation of descriptions and symbols. Soil descriptions and stratum lines are interpretive and actual changes may be gradual. Ground water level, if indicated, is at time of drilling (ATD) or for date specified. Level may vary with time. 4/98 J-4937 1/85 J-712-50 Figure A-8 2/2

Probe Log P-2

SOIL INTERPRETATION



P-2-HC1985

S&W 0003743

Sheet 1 of 2 Figure A-67

Probe Log P-2



S&W 0003744

P-2-HC1985

SOIL DESCRIPTIONS

(CLAY/SAND FILL)

(SILT II)

B-16-HC1985 STANDARD PENETRATION RESISTANCE LAB Depth in Feet A Blows per Foot Ground Surface Elevation in Fast 9.40 Sample 0 Т Very loose to loose, moist to wet, gray to brown, silty fine to medium SAND. (SAND FILL) 8-1 5 5-2 X 10 Soft to medium stiff, wat, gray, silty CLAY interspersed with SAND, clayey SILT and brick fragments. 5-3 P -ftu 6S 15 8-4 5-5 X 20 Х 8-6 25 Soft, wet, brown SILT with scattered shell fragments. (SILT I) 5-7 X 30 Loose to dense, wet, black to brown, fine to medium SAND with scattered shell and wood fragments. (SAND I) 5-8 35 5-9 Soft, wet, brown, silty CLAY to clayay SILT with scattered shell fragments. (SILT I) 5-10 X 40 5-11 X -65 45 5-12 X AL. 50 5-19 X 55 Medium stiff, wet, dark brown PEAT. 145 5-14 Stiff to hard, wet. blue-gray, clayay SILT to silty CLAY with scattered sand and organics. 60 Water Content in Percent J-712-50 May 1985 HART-CROWSFR & associates, inc.

S&W 0003647

Sheet 1 of 2 Figure A-17

B-16-HC1985



B-13-HC1985



SOIL DESCRIPTIONS



S&W 0003642

B-13-HC1985

B-19-HC1985

DIL DESCRIPTIONS	Depth in Feet	STANDARD RESISTAN Sample A Blows De	CE r Foot	TESTS
(Dense), moist, brown, slightly gravelly, fine to medium SAND.	1F°			
(SAND FILL)	15	S-1		
	- 5	ΠĒ	ни Ани	
cose to medium dense, wet, gray,	4 F	E E I I		-
andy GRAVEL and silty SAND Interspersed with gray, clayey SILT. (CLAY/SAND FILL)	IE.	8-2 X	1111 7 11111	
	1			
	11	MS-3		
	- 15		 µ - 111 	
ary soft, wet, gray, clayey SILT to	11	HE	1111	
	- 20	s-5		182
	1F			PP - 0-
/ery soft, wet, gray-brown, slightly	16	S-6 P		-TV="0-
ine sandy, clayey SILT with cattered shell fragments.	1 -	S-7		
	E	5-8 E	+	-65
	- 30			11910
/ery soft to soft. wet. gray-brown. hilty CLAY with scattered shell fragments.	1			
	- 35	S-9		
	1.5	L F IXI		
Hard, wet, gray, gravelly, sandy	41	S-10		
SILT. (SILT II)	1740			26.
/ery dense, wet, blue-gray, gravelly,	46	5-11 A	\$ T++	50 6.
(TILL)	- 45			-
	1	S-12		50
	- 50		<u> </u>	
(Hard SILT)	1 4			
	11	S-13	• A	
	+ 55			
	IF	S-14		
Surger and the second second	1 L 60	e Watar Co	ntent in Percent	
		J-712-50	May	198
		Sheet 1 o	f2 Figure /	1-20

B-19-HC1985

und Surface Elevation in Feet 10.77	in Feet Sample	ABlows per Foot	
ry stiff to hard, wet, gray. minated, clayey SILT.	1 E		
ottom of Boring at 62.5 Feet. Supleted 5/8/85.	1:		
ote: Boring blocked by broken split spoon sampler at 62.5 feet.	- 65		
Groundwater level not observed due to use of drilling fluid	t)		-
in suger. See text for inter- preted groundwater levels.	70		
	E.		
	F		
	+ 75		
	ļĘ		
	- eo		
	16		
	E as		
	1		
4. C			
	- 20		
	E		
	- 95		
	F		
	IF	E IIII	
	1 100		
	1 E		
	+ 105		
	15		
	- 110		
	1		
	F		
	+ 115		
	F		
	11 120		
Refer to Figure A-1 for explanation of deep	riptions	J-712-50 May	1



SOIL DESCRIPTIONS



S&W 0003646

B-15-HC1985



Probe Log P-1



S&W 0003742

P-1-HC1985
Probe Log P-3



P-3-HC1985

S&W 0003745

Probe Log P-3

SOIL INTERPRETATION



S&W 0003746

٤.

P-3-HC1985



S&W 0003651



S&W 0003652

B-18-HC1985

SOIL INTERPRETATION

(SAND FILL).

TESTS (140 pound weight, 30 inch drop) Depth A Blows per Foot Approximate Ground Surlace Elevation in Feet 10.6 Feel Sample 100 20 -0 medium dense, moist, bream, silty, gravelly SAND S-1 2/25/85 Soft, wet, gray, silty CLAY with occasional thin lenses of sandy silt and organics. (CLAY/SAND FILL). 5-2^A 172 0 CN 5-3 12 TV<. 125 PP<.25 5-4 X -15 AL P GS 5.5 TV<. 125 PP<.25 20 5-6 AL CN S-7 P ۲ 18 TUU 25 S-8 TV=u-<.125 PP=U-.25

Soft, wet, brown, clayey SiLT with occasional shell fragments. (SILT 1).

Very dense, saturated, gray, slightly silty, medium to fine SAND. (Dense SAND).

S-11 10 35 5-12X 5-13 P 40 5-14X S-15 P

2

Natural Water Content (%)

S-9

S-10 AK

S-16X

5-17X

30

45

50

D

.50 AL 50 6 50 100 10 20 5

S&W 0003617

J-712-50 1985 January HART-CROWSER & associates, inc. Figure A-2 Sheet 1of 2

B-1-HC1985b

at a set

LABORATORY

TUU TV=.20 .25

CN GS

PP=.50 AL

TV=<. 125 .25 PP=<.25-

STANDARD PENETRATION RESISTANCE

SOIL

B-1-HC1985b STANDARD LABORATORY

TESTS

PENETRATION RESISTANCE

1140 pound weight, 30 mch dropt Depth A Blows per Foot Feel Sample 50 Very dense, saturated, gray, slightly silty, medium to fine SAND. H(3) S-18 50 55 50 -H(3.5) 5-19 60 50 -H(3) S-20 65 -H(3) Very dense, saturated, gray, gravelly SNAD. 5-2100 50 70 50 -H(3) S-22 ø -75 5-23 50 -H(1.5) Bottom of Boring at 78.0 Feet. Completed 1/11/25. BO Note: Groundwater level not observed due to use of drilling fluid in auger. See text for interpreted groundwater levels. 85 20 10 Natural Water Content (%) Ground Water Level Sampling Laboratory Tests Notes GS Grain Size Analysis 1 Sol descriptions are interpretive and 2' 0.0 Spiri Spean Sample TUU Trianal Unconsolidared M Undrained actual changes may be gradual Bentunne Seat \$ CN Consolidation Test Trianal Consolidated Undrained TCU 2. Water Level, if indicated, is for the date 3" O D Shelby Tube Sample Permeability Test к specified and may vary with the time of O 214/183 DS Dwect Shear TCD Treased Consolidated Drained 10.01 Cutting Sample am 3. Water content not determined on very **OU** Uncontined Compression Water Level (Date) Water Content (%) No Sumple Recovery . small samples nor on samples with ATO At lone of Drohing Limit Natural Limit significant gravel content. 14 Torvane, Ist P Sampler Pushed Observation Wes Inp or Stotled Section Hydrautically, Not Driven **PP** Pockes Penetrometer, 1st Water Contest J-712-50 1985 January H(3) Heave in Feel

S&W 0003618

HART-CROWSER & associates, inc.

Sheet 2 of 2 Figure A- 2

SOIL

B-3-HC1985b

STANDARD

PENETRATION RESISTANCE

LABORATORY TESTS

			(140 pound weight, 30 inch drop)
oproximate Ground Surface Elevation in Feet 10.3	Depth Feel	Sample	▲ Blows per Foot
Loose to medium dense, moist to saturated, gray, silty SAND. (SAND FILL).		S-1	
		S-2 ⊠	
Soft, saturated, gray, clayey SILT with lenses of very silty, fine SAND. (CLAY/SAND FILL).		S-3A_B	AL
Slightly gravelly SAND	20	5-4 A	- GS
Soft, wet, brown, clayey SILT with occasional shell fragments.	- 25	S-5 X	
silty CLAY	-30	s-7 X	- GS
lard, damo, brown, slichtly gravelly, slightly	- 35	S-8 AX	AL
andy SILT. Hard SILT).	40	s-9 X	
ery dense, wet, gray, slightly silty, gravelly, AND. (Dense SAND).		S-10 Å	

S&W 0003621

J-712-50 January 1985 HART-CROWSER & associates, inc. Sheet 1of 2 Figure A-4

TESTS

LABORATORY

STANDARD

PENETRATION RESISTANCE

SOIL INTERPRETATION



SOIL INTERPRETATION

STANDARD PENETRATION RESISTANCE

LABORATORY

B-2-HC1985b

TESTS

(140 pound weight, 30 inch drou)

Depth A Blows per Foot Approximate Ground Surface Elevation in Feet 11.4 Sample Feel · 0 Q2/25/85 Hedium stiff, moist, gray-brown, sanoy, clayey SILT. (CLAY/SAND FILL). S-1 N 5-2A GS Loose, saturated, gray, very silty SAND. 10 X 5-3 15 Soft, wet, gray, slightly sandy, clayey SILT. 5-4 N 20 S-5 GS AL 25 5-6 30 Soft, wet, brown-gray, slightly sandy, clayey 5-7 SILT. (SILT I). 5-8 N GS AL - 35 S-9AV Very dense, saturated, gray, slightly silty SAND with occasional gravel. B 40 (Gense SAHD). -H(1) 5-10 X 45 Very dense, saturateo, gray, fine to medium SAND. 50 S-11 GS -H(3) Slightly silty 50 10 20 Natural Water Content (%)

S&W 0003619

J-712-50 1985 January HART-CROWSER & associates, inc. Sheet 1of 2 Figure A- 3

B-2-HC1985b

TESTS

LABORATORY

STANDARD

PENETRATION RESISTANCE

Boring Log B-2

SOIL INTERPRETATION



Sheet 2 of 2 Figure A- 3

SOIL	
INTERPRETATION	

B-4-HC1985b

STANDARD PENETRATION RESISTANCE

LABORATORY TESTS

(140 pound weight, 30 mch drop)

Depth A Blows per Fool Approximate Ground Surface Elevation in Feet 10.8 Sample Feel -0 Loose, wet, gray, slightly silty to silty, medium to fine SANG. S-1 N (SIND FILL). 5 2/25/85 4 5-2 X ÷ 10 5-36 ۰. Soft, wet, gray, silty CLAY with occasional thin lenses of sandy, clayey SILT. (CLAY/SAND FILL). 5 5-4 X 6S AL 20 5-5 5-645 25 Soft, wet, brown, clayey SILT with shell fragments. (SILT I). S-7 X 30 S-8 X GS AL Slightly sandy, silty CLAY 35 Medium dense, wet, gray, fine to medium SAND with shell fragments. (SAND I). 5-9 X 40 S-10X 45 Very dense, wet, gray, fine to medium SAND with shell fragments. (Dense SAND). H(3) 50 S-11X 50 20

S&W 0003623

J-712-50 1985 January HART-CROWSER & associates, inc. Sheet 1of 2 Figure A-5

4

Natural Water Content (%)

H(3) Heave in Feet

SOIL INTERPRETATION

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S&W 0003624

Sheet 2 of 2 Figure A-5

B-4-HC1985b

TESTS

LABORATORY

STANDARD

PENETRATION RESISTANCE

SOIL INTERPRETATION

PENETRATION RESISTANCE

LABORATORY TESTS

B-8-HC1985

(140 pound weight, 30 mch drout

STANDARD

Depth A Blows per Fool Approximate Ground Surface Elevation in Feet 10.9 Sample Feel -0 ASPHALT CRUSHED ROCK S-1 Hedium dense, wet, gray, slightly gravelly, silty SAND. (S/ND FILL). 20 AU1105 5-2 10 S-3 Very sandy SILT. N -65 15 5-4 ∇ Slightly silty. -GS -20 5-5 X 25 Very soft to soft, wet, gray-brown, slightly fine sandy, clayey SILT. 5-6 N (SILT I). AL - 30 5-7 P 35 5-8 5-9 M AL. 40 5-19X 45 Hedium dense, wet, gray-brown, very silty, fine to medium SAND. (SAND 1). S-11 GS v 50 Natural Water Content (%)

S&W 0003631

J-712-50 January 1985 HART-CROWSER & associates, inc. Sheet 1of 2 Figure A-9

SOIL



S&W 0003632

Sheet 2 of 2 Figure A-9

B-8-HC1985

LABORATORY

STANDARD

SOIL

INTERPRETATION



B-5-HC1985b

STANDARD

PENETRATION RESISTANCE

LABORATORY TESTS

S&W 0003625

J-712-50 January 1985 HART-CROWSER & associates, inc. Sheet 1of 2 Figure A-6

SOIL

STANDARD PENETRATION RESISTANCE

(140 pound weight, 30 inch drop)



S&W 0003626

Sheet 2 of 2 Figure A-6

B-5-HC1985b

LABORATORY

TESTS



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B-9-HC1977

BORING LOG B-5

STANDARD PENETRATION RESISTANCE

B-5-HC1977

SOIL INTERPRETATION



J-414 MARCH 1977 HART-CROWSER & associates inc. Sheet 1 of 2 Figure A-18

B-5-HC1977

SOIL INTERPRETATION





SD-117-SW2003

SOIL DESCRIPTION Coordinates: N: 220,606 E: 1,271,285 Surface Elevation: 18.9 Ft. (NAVD-88)	Depth, Ft.	Symbol	PID, ppm	Samples	Ground Water	Depth, Ft.	PENETRATION RESISTANCE Blows per Foot (SPT) Blows per Foot (non-standard) 0 20 40 60
Loose to dense, gray, gravelly SAND to sandy GRAVEL; moist to wet; variable silt; scattered to abundant asphalt, brick, and concrete rubble; locally clayey; (Hf) SP-SM/GP-GM. Soft, gray, clayey SILT; moist; interbedded with sandy seams; (Hf) ML.	7.0	0000	0 0.2 0 0 0.8 0.2	Ë H H	During Drilling (c)	10	
GRAVEL and slightly silty, gravelly SAND; wet; (Hf) GP/SW-SM. Medium stiff to very soft, dark gray-brown,	19.5	CL CO	0.1 2.2	의 신 다		20	
slightly sandy to sandy, clayey SILT; wet; abundant shells, scattered to abundant wood debris; (He) ML.				6T			/ · · ·
and the second second				<i>τ</i> Τ		30	
Very soft to soft, gray-brown, clayey SILT to silty CLAY; wet; massive, commonly with trace of fine sand, grading more plastic with	- 33.0		0.3	٥T			
depth, scattered to abundant shell fragments below 45 feet; (He) CL/ML.				10 10 전		40	•
				12 12 12		50	
				ъŢ			
Stiff, light blue-gray, silty CLAY; wet; scattered seams of fine sand, abundant organic veins; (Qvrl) CH/CL.	58.0			16I		60	
Manufactory of the almost group links	68.0	1		16 <u>T</u>			
silty, clayey SAND; moist to wet; abundant seams and layers of slightly clayey, silty sand; scattered layers of silty clay; (Qpgm) SC/SM.		A STATISTICS		17II 18II		70	• 50/5 • 50/6
CONTINUED NEXT SHEET	_	12	1		-	_	20 40 6
	und Wate	et 1 iev	A Is	TD			% Water Content Plastic Limit Matural Water Content
3.0" O.D. Osterberg Sample NOTES							Seattle Monorall Project Seattle, Washington
 The boring was performed using Mud Rotary drilling met The stratification lines represent the approximate bound the transition may be gradual. The discussion in the text of this report is necessary for a nature of the subsurface materials. 	thods. aries bet a proper	ween wille	soli	types, an	nd ne	L	OG OF BORING SD-117
 Groundwater level, if indicated above, is for the date spe 5. Refer to KEY for explanation of symbols, codes and defi 6. USCS designation is based on visual-manual classification 	nitions. Ion and s	election and	y var ed la	y. b testing	SG	HANN	NON & WILSON, INC. FIG. A.2-19 Sheet 1 of 2

REV 3

SD-117-SW2003



REV 3

B-5-SW1992



stant and that

19.25

125.5

3

.4

G,



TB-93-SW1984



TB-80-SW1984

		T		1	-	F	IELD DATA			
13	SUIC DESCRIPTION	Ŧ	LE.	5		Penetration Res	attance *	Standard Penetration	Equiverent" LABO	RA-
Ĩ.	Suday Flamma & 8.7 (mg	53	N.	Mai	1	Biows per	30" drop) foot	(140 lb. hernmer, 3 A Blows cer	O" droo) TOP	YF
-	Surrade Elevation: 2 8.7 feet	0-	S	7 -	ă	0 70	40	60 80	1001	
	17 Medium dente, prown, gravely, siry SAND; pieces of wire (FILL)	48	II	王寶	0	A A	.			
	Medium dense, yeriaw-arown, mattied,	4	21	EE						
1 '	Medium stuff aray armenia shock sing	as	JIN	13-5-			111			
	CLAY' sanered wood tragments (FILL)		AI	125	10		1.		2	
1.4	Very 100 2 234 CLEVEY, MITY SAND	11.5	5T	EE				····		
	Very loose to medium dense, dars grav, sity, fine		٥Ī	77						
	debris, abbie et 17 feet		T	8						
			*I	2	20	12			GSA	
-14	3	23	9 IN	=			in in			- 1
	Very loose to medium dense, dark grav, sity, fine		10 T	1				•		
	abundant shell fragments		"王	7		🔺 Lint 📔 Lint		•	1	- 1
			12	ŧ	30			-		
			"王	1	H		•	1	GSA	- 1
-26.	B Dente, dars grav, sugntly sity, line to measure	35.5	"±	7		X	•			
.29	SANO abundant shell fragments	- 38	!5∓	7					1	- 1
1	Very dense to medium dense, grav, signity sity to		"±	T	40		~	≫;	··	- 1
	and wood fragments, stattered coopes		12+1	1			5	1 .		- 1
			==	1	-					
-40.		49	"÷			-	1 ** 9		GSA, A	42
1	Loose to medium dense, grav, slightly clavery to clavery, fine andy SILT lenses of clavery art with		==		≈⊦	1/1			61.1	- 1
-46.3	clay and omet, abundant shell fragments and wood		2=					1	75.5	1
	Very mitt to sort, grav, clavey SILT to sity CLAY,		==			I X	· ·			
	scattered decayed roots, enses of fine to medium		==				; F			
1			=		~Γ		;			
1			主			A La La Seria				
.59.3		. 2	7-							
	Medium dense, grav, signtly sity, fine SAND;	1 ²⁰ 2	s I	7	۰L	A MARTIN A	1.			
1	ienses of davey sit and fine sandy sit	7	ATTA			1				
	Very dense, grav, signify clevery to clavery,	1715 3	5年1		1		AO-			
	gravely, sity, has to maker SAND, with dayay	3	TI			····· (···· (· ·	-	
1	Sit lavers (TILL-LIKE)	3	2=	3		•	1	7	0/5"	
	Very dense (hard), gray, interbedded, clavey, sity,	215 2	T		1	-			GSA	
	TILL-LIKE	3	• T				1			
		3	=			•	1		0/J	
1.3.5	Very dense to dense inard), grav, interbedded.	89.5 3	主日	90	1			1		
	CHAVEN SITY SAND and gravely, sindy, sity CLAY	x	=					7	5.4"	
	(TICLICIAE)						1			
		39	T11	0.22		. · · · · ·	• +	. 1		
		40	T	100	1	1	- <u>1-e</u>			
		41	-ENI		1		ļ	. /	5.6"	
-97.3	INTY THE THE LINE CRAVEL	106.5 42	TI			•	1	. 101.	10	
	tilbine, sity cay (TILL-LIKE)		_	110			1	7	5/4	
		-	1							
			- 11					; ;		
-109.2		118 45	IN			1	i i			
-111.5	very dense, grav, sinty, line to coerse SAND	20.2 46	_	120	L		-		7	
	COMPLETED BOARS						1			
					1	1	The sures	- in the second		
1	BECAUSE LEAD AUGER WAS LOST IN					EZ MUD OF	RILLING FL	UID TO 89.6 FT.		1
	BOTTOM OF HOLE. BORING WAS			130	-	THEN ROT	ARY ORILL	ED WITH REVERT		1
	DRILLED AND SAMPLED TO FINAL						1	·		1
	DEPTH.						i	1		1
	**92.5 to 120.2 140 to harmer uphole					!	25	ł		1
)	10	20	20 40	5	-
MOT	F: The stratification in a						Water of	antent		1
	between son types and the actual transition may be	oundane								1
	LECTIV	0					DOWN	TOWN SEATTLE TRA	NSIT PROJECT	1
-	125" 0.0 plu mon mon	2								1
+		Hall Table		Atterberg 6	-	¢	L	OG OF BORING	TB-80	1
-	Water le	wei	1	· · · ·	La	und limit		STATION 93+25, 19	FT. IL	
	Grad sample Piezome	THE THE		1-	Nat	tural weter content	China	1 1980	w-4265-00	4
	unito le not recovered P Semole ;	bushed			Pla	stic limit	Geotech	nical Consultants	FIG. A-80	1

TB-81-SW1984

	SOIL DESCRIPTION	0				FIELD DATA		
ELEV.	Surface Elemenon: + 9.9 mm	EPTH.	Tound	tin.	Penetration R (307 Ib. hammer & Blows pe	rustance Sta 1. 30° drop) (1 r foot	Idard Penetration Equivalent 40 Ja. hammer, 30" drop)	TORY
-		10	03		0 20	40	60 80 10	12313
5	Very loose, stown, sity, gravely SAND (FILL) Very loose, gray and gray-orown, sity, clayey, gravely SAND (FILL)	ннн	11-20-05	10		•	•	
	Very loose to loose, grav, clean to slightly ality, fine to coarse SAND: scattered graves	14 5 6 H H T	++++++	20	•	•		GSA
1.121	Loose to medium dense, gray, clayery, sity, gravely SAND	22 9 <u>1</u> 10 <u>1</u>	111			•		
-18_1	Very soft, grav, clavey SILT, numerous shell fragments	28 11 <u>I</u> 12 <u>I</u>	Ŧ	30.				
	Dense to very loose, dark grav, sity, line SAND; and fine sindy SILT; numerous shell fragments, locally signtly clavey to clayey	13 14 15 15 15 15		4	A and			GSA
		17 18 19 20 21 21 21 22 21 22 21 22 22 22 22 22 22		50				gsa -
-50.1	Very stiff to soft, interbedded, gray, silty CLAY and dark prown, silty PEAT	24 25 25		50				
	Soft to stiff, gray, sity CLAY; lenses of sity, fine sand	25 76 I	7		1. ¹⁰	•	74.4	
-76.1 -76.1 -80.1 -80.1	Dense: grav SILT 75 Verv dense to verv bode, grav, clavery, sity SANO; 77 bodity gravelity ITILL-LIKE) 86 Dense (hard), grav, interbeloded, clavery SILT and sity fine SANO 86 Dense to verv dense grav, gravelity SANO and sity fine SANO 90 Dense to verv dense grav, gravelity SANO and sity of Clavery and taxet a	ЧНННННН НН НН Н Н Н Н Н Н Н Н Н Н Н Н Н	84 90 100 110 120				50.4 50.4	170 2/6" GSA
NOTE:	*Uphole Hemmer The stratification lines represent the approximate boun between soli types and the actual transition may be gra-	dan es soluel	J		10 •	20 30 S Water content	40 50	
H H G G	O.D. solit sooon sample Impervious s O.D. thin well sample Water level So sample Piszomerer t male not recovered P Semple push			Alan Nits: Liqui Natur Plastic	d limit 31 weter content 5 limit	LOG C STAT JANUARY 198 SHANNON & W	DF BORING TB-81 ION 93+54, 174 FT, IR) 5 W426	5-00 -81

TB-78-SW1984



TB-79-SW1984



Elaura A-00

TB-82-SW1984



TB-3-SW1984

				FIEL	D DATA	
25	SOIL DESCRIPTION	EPTH. EET	Ground Weter	Penetration Related (300 lb. hermer*, 18" & Blows per foor	ncal Standard Penetration Educationt drop) (140 lb, hammer, 30" drop) t △ Blows per foot	TORY TESTS
32	Surface Elevenan: ± 10,0 feet	92 3	7 0	- 0 70	40 60 80 100	
-10.0 -20.0 -25.0 -37.5 -46.3 -50.0	Surface Eleveron: 10,0 feet Medium dense to very loom, black, landy, sity GRAVEL; mostly slag, cool, and brick fragments IFILL) Very loom, grav, sity, fine SAND: locally slightly clayey, stace of gravel, locattered organics and shell fragments Loose to medium dense, grav, sandy GRAVEL: shell fragments Loose to medium dense, grav, sightly sity, fine to medium SAND: scattered gravel, shells, and wood fragments Medium stift to very stiff, grav, sandy, slity CLAY: scattered gravel and organics, with a clavey gravel laver Brown PEAT Medium dense, grav, sity, gravely SAND (TILL- LIKE) Soft to very stiff, gray, sing CLAY, with clean to slity, fine and lenses, trace of gravel	AND A S<			Δ Blows per foot x0 60 80 100 70.3	TESTS
-78.C -	Medium denias to very carsa, grav, sity, clavey, gravely, time to coerse SAND (TILL-LIKE) BOTTOM OF BORING COMPLETED 10-12-84	29 H 30 H 11 H 13 H 14 H 15 H 38.0 38 - 1	a 90		50/6" 50/6" 50/6" 50/5"	
						1
	HOLLOW STEM AUGER DRILLED WITH WATER NOTE HYDROCARBONS OBSERVED FROM DEPTH OF 5.5 TO 20 FEET.					
	"Downey stonowoC"		0	o 10 2	0 30 40 50	
NOT	FE. The stratification lines represent the approximete / between soil types and the actual transition may p	boundaries 18 gradual		. 1	DOWNTOWN SEATTLE TRANSIT PRO	UECT
	LEGEN	0				
чнч	125" O.D. solit socon sample F Imperve 3" O.D. thin well sample V Water s Grab sample Piezomi	ous san evel evel	Arrandong	imits: — Liquid limit — Natural weter content	LOG OF BORING TB-3 STATION 91+25, 3 FT. (R) JANUARY 1986 W-	265-00
N	Samole not recovered P Samole	Du shed		- Plastic limit	SHANNON & WILSON INC. FIG.	A-3

TB-25-SW1984

		5			Fil	ELD DATA			
ELEV.	SUL DESCRIPTION	DEPTH. FEET SAMPLES	Ground Water	Fail .	Penetration Reset (300 lb, hemmer*, 1) & Blows per fo 0 20	tanca 8" drop) sot 40	Standard Penetration 6 (140 lb. hammer, 30 <u>A</u> Blows car fr	du weient " drop) bot	TORY TESTS
-10. -20. -37.1 -49.3 -65.3 -72.8 -89.8	Surface Elevation: 2.9.7 feet Very local: gravingreen to black, clavery, billy, gravely SAND, with layers of ally clav, locality day, locality solutions of tragments if iLL3 Very soft, grav, clavery SILT; trace of organics, locality clavery, solutions, grav, billy, fine to medium SAND, locality clayery, solutions and brick regments Very local: to medium dense, grav, billy, fine to medium SAND, locality clayery, solutions very soft, grav, clavery SILT; trace of organics, wood fragments Very local: to medium dense, grav, billy, fine to medium SAND, locality clayery, solutions very soft, grav, clavery SILT; billy CLAY and are brown PEAT Soft to stirf, grav, clavery SILT, billy CLAY and dare brown PEAT Soft to stirf, grav, clavery SILT, billy CLAY and dare brown PEAT Soft to stirf, grav, billy CLAY, with layers of billy, fine and and clavery bill, softered organics and root hoes Medium cense to dense, grav, clavery, graveliv, billy SAND, trace shell fragments (TILL-LIKE) Medium cense to dense, grav, clavery SILT and fine and root hoes Soft to SILT, trace of organics (TILL-LIKE) Medium stift to hard, grav, fine graveliv, sandy, billy CLAY, with layers of clavery SILT and fine andro SILT, trace of organics (TILL-LIKE) Soft to SILT, trace of organics (TILL-LIKE)	A A H <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>50.6"</td>							50.6"
NO	*Downhole Hammer TE: The stratification lines represent the approximate bo between soil types and the actual transition may be	undaries gradual		3	10 :	.10 1. Water co	30 40 ntent	50	
_	LEGENO	y sousi.				DOWN	TOWN SEATTLE TRA	NSIT PRO	ECT
- <u>T</u>	TO D. the wall serves	1 30001	Atterberg I	-		L	OG OF BORING	TB-25	
G	Grab sample Piezomete	r txo	T	- Nat	tural water convers	JANUAR	Y 1986	w-42	65-00
N	Samole not recovered P Semole pu	shed		- Plat	nic limit	SHANNO	N & WILSON INC.	FIG. A	-25

TB-22-SW1984

FIELD DATA SOIL DESCRIPTION SAMPLES Penetration Resistance Scandard Penetration Equivalent LABORA-DEPTH, Ground FEET feet, (300 lb. hemmer*, 18" drop) A Blows per foot TORY TESTS Surface Elevation: :10.0 feet 20 60 40 80 100 2-13-86 Medaum dense to dense, prown, gravely, fine to 0 НННННН 0 coarse SANO; numerous brick fragments and organics (FILL) . 10 7 3 Loose to medium dense, block, sity SANO and GRAVEL, numerous prick and wood fragments 10 (FILL) 69.7-7I e 20 8I -120 22 à Medium dense to very dense, brown to black, sitty, 9 CHAVEY SAND and GRAVEL 55/8- -10 => 4 30 11 T 6-17 12 I T 13 I .27.0 37 14 I Very dense, tan to light gray, sity, clavey, gravely m. SAND: locally grades to gravel, numerous iron-40 75/2" Oxide staint, occasioner opopies, trace of organics (TILL-LIKE) 4 16= 75.5" -17-75.4.5" 4 18= 75.5 19-50 72:2 20 -----21= 75/4" 111 .50.0 60.0 60 BOTTOM OF BORING COMPLETED 9-13-84 NOTES 1. DRILLING STOPPED AT 50 FEET DUE TO EXCESSIVE COBBLES AND GRAVEL 2 HYDROCARBONS OBSERVED FROM DEPTH OF 7.5 TO 36 FEET. ROTARY DRILLED WITH REVERT DRILLING FLUID 1 ! ÷ · • • · · · - - · · 1 ٥ :0 3 30 40 50 "Downnose Hammer S Water content NOTE. The mratification lines represent the approximate boundaries between son types and the actual transition may be gradual. DOWNTOWN SEATTLE TRANSIT PROJECT LEGEND 125" 0.0. solit socon smort ÷ Impervious seel Atterberg Lemits: LOG OF BORING TB-22 STATION 89+74, 32 FT. ILI II JO.D. that well more V Water level Laud limit G LANUARY 1986 W-4265-00 Grab samole Piezometer Iso Natural water content SHANNON & WILSON INC. Geotechnical Consultants N Sample not recovered P Samole pushed - Plastic limit FIG. A-22

TB-1-SW1984



B-4-CWD1980

	100 25°	ores	120	5.00	A SECTION		tre	ESL MOISTUNE	downstrawov	T L	50	1	and and	Otest est	0.4	SESCRETICS	x		:1: 		MOISTURE	CONSISTENCE
	0				CLAYEY SILT (cont.)		wet	very soft		1		2		1	SILTY SAMD (Fill)	brown, scatter	fine to	nedium, fragme	ts.	noist	loose
9C	0		49.7			cattered shell ragmants.				Ē	5	10	3 6 7	28.	3	SILTY CLAY	light o organic	may, con	itains		wet	very soft 1
10 C	2 11 13		56.6		SILTY SAMD g t c	ray, fine to media race gravel and lay.	-	wet	very dense		10	20	1/12*	31.	1		interbe and fir sand la	dded sil	ty clay lium approx.			
11 C	26 66/6		-	-	_		-	-	-	1		30	121	40.	7		4" thic	x .				
1.00	1.112	-	4.5	8 8 4	Bottom of bor Pierometer se Completed Oct	ing at 54.0'. e with tip at 20.0 ober 20, 1980.					20.	44	111	48.	3							
10 ME	48.4	- 27	1.55%	14	-	欧い病	1	gi wet			25 .	se	X 1 1	* 2	1. 10	4.5	-		12.0	14 A.	9. +	1.004
は、 公司は湯	「「「	そいう大村残酷	11-5-22	するの							30		0 1 1	52.	6	SILTY CLAY	dark gr layers thick, shell f	ay, orga to appro scatters ragments	aic x. 1° d	F305	1	100
Build Barby V	にの語い	第5-3世界を、 1	いなな	「二、東京市、二			記録で				35	70	1 .	1.	1.12	ORGANIC SILT	dark hr fine sa shell f	own, lit nd, scat ragments	tle tered	100	wei Laufer	very soft
AN 1. 12	いたの語言	21239.20	ANS: 1 - 3	1. A.		T. F. Jak	tr pénét.				40 -	80	1			CLAYEY SILT	gray, 1	ittle or	ganics.	-	wet	very
0.5.0		antiner Innepileer	e. 9	·1/6" 0.	5. 1 1-1/2' May "4-	Allarburg, C - esseculution, DB	- dennel sta		autor level Incorrigan and accomptor to		· 4 6. 0.	2" 1041- 3" 0.0. 1 2-1/2" 1	0.0. spirt 5	arred speep			- Allierbard, C	- consolitation r - tricalat, P -	10, 25 - Greet	abear.	f	ratar birebi anyarribas de dagometar 1
	A. 100	14000	e.s	1/4" 0.	A 1 5-1/2 Mer "A	Albertung, G generalization, DB profession, T Marsiel, F perma ADOLT REPRARTLUTATI		- F	numer ment Incompose test plagameter to Project No.	<u> </u>	40	- 8C	1 1/12*	PR	- 3-1/4" G	CLAYEY SILT	gray, 1	- constants - constants - constants REHADILI	ganics.	abaar.	wet	V 3 natur

B-2-CWD1980

12 3 30.0 shell fragments, interbedded with and fine said layers and fine said layers. 60 33 35 44.4 13 3 44.4 67 4 7 4 7 4 7 5 8 5 13 3 44.4 5 9 44.4 9 5 10 5 11 5 12 5 13 3 44.4 5 9 3 13 5 14 5	edium to ins wood	Loose
A C 1 S 12.5 W Start A C 2 1 29.7	rganics.	BOSS
B-3-CWD1980

and a	e and	in at	- OTH	and a start	A A A	DEECHATION SILT (cont.)	rr sanyada sen,r at find sakafi Adamingken dar annelik af dite Adamingken dar samta senta teath Adami dar tami, tem karta teath K	a ar fog stand		N Track an analysis and an track and a strong balance a strong balance becks trained	COMBINITURE	- -	•	Bartes o	No st	A ALAN	ASPHAL SILTY SAND	gray-brown	fine to		Merature V	CONNETTO
45	90	111		47.0		SILTY CLAY	dark brown, so organics and a fragments.	attered thell		Vat	very soft		1	5_10	2 3 2	15.7	(F111) SILTY SAMD (F111)	blue-gray, nedium, li scattered and organia	fine to ttle clay, wood chips		very moist	loose
50	10 C	0 1 1		44.2					***			he .	1	10 20	2 1 1	26.7	CLAYEY SILT	gray, scat ics, wood pieces of interbedden silt layer fine sand	thered organ- thips and concrete, i with thin s and silty lavers.		wat Y	very soft
55-	11	1 2 1		43.1		SILTY SAND	brown, fine to sand, little c organics, trace fragments, gray, scatter	medium Lay and shell d organ-		wet	very loose		1	15	11	50.8	grades to					
60-	12 C	3 4 7		24.4	2.76	SILTY SAND	gray fine to	medium,	14	wet	medium		1	20 - 40	1/1/2*	48.1	SILTY CLAY	gray, scat organics.	tered	-	vet	vary soft
65 1	11.0 E.	57.8	the set the	9.9	Bright Fr		little gravel clay.	, trace	1917 . 1		11000		1	25 - 50	11/12*	58.2		186		E. Wight		調整す
1977 10	14	19 20 21	tiges align	のない	1601 (See	14	inii - dua Fean	Z. Galanti	13 61	1. Marco	the sea	11		10-00	1/12"	39.4	STLT	dark brown organics.	, little	Jasper .	vet Weter	very soft
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April 21, 2022

WSBLE Draft Environmental Impact Statement Comments c/o Lauren Swift Sound Transit 401 South Jackson Street Seattle, WA 98104 <u>WSBLEDEIScomments@soundtransit.org</u>

RE: WSBLE Draft Environmental Impact Statement Comments

Dear Ms. Swift:

Urban Visions (UV) is planning several major development projects along 6th Ave S between Seattle Boulevard S and S Royal Brougham Way. Projects at 831 Airport Way S and the Project S development (1001-1048 6th Ave S) are Seattle's last campus opportunities adjacent to downtown and are poised to capture major firms looking for a definitive location to mark their presence in Seattle. When complete, these projects will bring over 1,300,000 square feet of next generation office space along with 50,000 square feet of retail space to Seattle's southern gateway connecting the International District, Pioneer Square, Yesler Terrace, the Stadium District and the renewed Waterfront, all of which define Seattle's future over the next 10 years and beyond. Access to multi-modal transportation at the regional epicenter of the new light rail grid is the site's fundamental advantage.

Because of the incredible transportation assets adjacent to both Project S and the 831 Parcel, UV has invested in the SODO/CID neighborhood along 6th Ave S and wants to avoid any alignment or station surface structures that directly conflict with these sites as the CID station is one of the most crucial for connectivity in the region.

In reviewing options for the new CID station and alignment, we have the following comments:

Option 1a (shallow 4th Ave) – primary preferred option

- Option 1a could work with no apparent direct impacts to Project S or the 831 Parcel
- Prohibits vehicles exiting 90W to go north on 4th Ave S which would directly affect vehicle access for Project S and 831
- 4th Ave options do not permanently displace potentially historic "contributing" structures adjacent to the Chinatown Gate for station build-out

April 21, 2022 Page 2 of 4

- Option 1a should look at incorporating improvements that will be necessary to ailing infrastructure in the vicinity including the 2nd Ave Extension S Bridge, S Jackson Street Bridge West, and the 4th Avenue South Bridge West and East
 - Potential positive for Option 1a would be the redesign of the 4th and Jackson Intersection
- The proposed, new tunnel ventilation building on the NW corner of Union Station Plaza is to be further studied for visual and noise impact to the neighborhood
- CID 4th Ave options are approximately \$500M more than the 5th Ave options mainly due to having to rebuild the 4th Ave S Viaduct. This scope and cost were not included in the original ST3 budget and would require alternate funding sources. However, we are in support of the additional funds to rebuild the Viaduct so that this work can be completed in concert with the ST3 improvements as it may need to happen in the near future regardless.
- Longest construction duration (9-11 years) although the longest duration, this option has the max long-term benefit for the neighborhood more directly connecting both Pioneer Square, the Chinatown International District and existing transit infrastructure.
- Significant impacts on future and existing development sites on 4th Avenue.

Option 1b (deep 4th Ave) – not preferred

- Option 1b could work with no apparent direct impacts to Project S or 831 Parcel however it is not preferred due to accessibility issues driven by the depth of the station
- Option 1b would permanently displace the Ryerson Bus Base adding to project complexity and would include future property acquisition to relocate
- Elevator access only is not viable for the station that will be the main, regional transfer point for the ST network. This will increase travel times and subsequently negatively impact ridership

Option 2a (shallow 5th Ave) – absolutely not preferred

- Option 2a directly impacts the 831 Parcel with a stair that goes from the tunnel to the surface
- Egress stair located in the center of the 831 parcel is not acceptable and must be relocated or incorporated into the parcel for a viable TOD opportunity
- Tiebacks for Project S will conflict with the shallow tunnel, fiberglass was reviewed with ST but since SDCI has not approved alternative fiberglass tieback systems, there is unacceptable feasibility, schedule and cost risk to incorporate these into the Project
- Project S will complete full block street improvements for 6th Ave from Seattle Blvd S to S Royal Brougham at the cost of \$20 million, including new curb/gutter, protected bike lanes, bus stops, and pedestrian amenities. These improvements

would be demolished and would then need to be re-built for potential ground improvements or actual tunnel construction under this alternative

- Major utility and utility corridor relocates (and significant service interruptions) are not acceptable for continuing service to the over 1.3M sf of next-generation office campus provided by Project S
- ST must not disrupt and threaten the Chinatown-ID community and businesses with a disruptive cut-and-cover tunnel along 5th Avenue. This is not acceptable for continuing business operations and pedestrian walkability/safety
 - Will have the greatest impacts from noise, vibration, and visual disruptions during construction along with increased traffic impacts due to road closures and detours
 - o Removes 150-200 parking spaces during construction
 - Construction would be directly visible from Hing Hay Park which will directly affect access and useability during construction
- 5th Ave options permanently displace potentially historic "contributing" structures adjacent to the Chinatown Gate for station build-out

Option 2b (deep 5th Ave) – secondary preferred option

- Option 2b could work because there are no apparent direct impacts to Project S or 831 Parcel
- Deep tunnel at +/- 180' is below the planned foundation and tiebacks for the 2story garage
- Elevator access only is not viable for the station. If this option is considered, alternative means of access are to be considered or high speed, large capacity elevators are to be used at a minimum
- There are no apparent surface issues at final Sound Transit buildout for Project S or 831
- Support for the connection to both the preferred alternatives for SODO (south) and Downtown (north)
- Cost is within current ST3 approved budget (~\$1.2B)
- Shortest construction duration (6.5-7.5 years) this is a potential benefit to the neighborhood as a whole minimizing adverse environmental impacts

General Comments:

- Sound Transit should continue to look at incorporating investment in Union Station Plaza to the CID station to make it a premier transfer environment and programable public space for the preferred alternative
- Where railways are above grade or associated railway infrastructure occurs at the surface, the location of these needs to be such that viable TOD opportunities are still realized for those parcel owners including at the 831 site and Project S

April 21, 2022 Page 4 of 4

- Increased travel times required for the CID and Midtown stations associated with the deep options are a concern for commuters and future tenants at our projects
 - However, if the 5th Ave option is selected, the deeper option is favored to mitigate against soil conditions, underground utilities, high-rise bldg foundations, tieback conflicts and existing tunnel infrastructure
- Tunnel construction requires fresh air which would require ventilation with fans running 24 hrs a day which may be audible at portals, stations, etc. These appurtenances must be studied in more detail and mitigation represented in the FEIS
- DT segments could include modification or addition of emergency egress, ventilation or other ancillary facilities needed for ongoing Tunnel operations – location and both short term/long term disruptions are unknown in the DEIS
- CID Station must have in-station, accessible, and easy-to-navigate transfers between light rail, Sounder, and Amtrak
- The DEIS does not evaluate the impact of unidentified construction staging areas associated with the CID segment. These staging areas must not interfere with the construction or operation of the Project S and 831 developments without mitigation for them defined.
- Environmental impacts related to the construction including noise and vibration impacts are to be clarified through specific performance standards in the DEIS to ensure full mitigation where occurs.
- Stadium Events should be considered in the transportation analysis for all options

831 Site – General Comment:

• The 831 parcel should be included in Appendix K, Future Development Projects

Sincerely,

Greg Smith Founder & CEO Urban Visions



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

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of Net Seattle LLC, the owner of the property located at 801 3rd Avenue (TPN 0939000310) (the "Property") to provide comments on the Draft EIS for the WSBLE project. The Property is the development site for The Net, a 700,000-sf. office building with parking and retail uses (the "Project"). A Master Use Permit has been issued to permit development of the Project and building permits have been issued.

We expect that The Net will be one of the preeminent office towers in Downtown Seattle. The Project will benefit from nearby connections to the 3rd Avenue Sound Transit tunnel and future connections to the WSBLE system. We support the WSBLE project and the opportunity to expand light rail accessibility throughout Downtown.

We are writing to express concerns about impacts associated with the development of the Midtown Station. These impacts on The Net 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 Net. The Draft EIS should examine these impacts and identify ways to mitigate the street closures so as to avoid such impacts.

Additionally, while the Draft EIS makes reference to these possible street closures, the list appears speculative and uncertain – not a worst-case analysis as is required in an EIS. Further, the Draft EIS does not evaluate the impact of such closures or propose mitigation for nearby properties to avoid congestion in the Downtown area.

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. Much additional work is required to ensure that the Draft EIS meets this test. The EIS should include 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 Smal

701 5th Avenue, Suite 6400 Seattle, WA 98104 PHONE: (206) 262-2880 FAX: (206) 262-2889

** Urban Visions 701 5th Ave, Suite 6400 Seattle, WA 98104 100202-40100 WSBLE Draft Environmental Impact statement Comments c/o Lauren Swift Sound Transit Seattle, WA 98104 401 S. Jackson St. 28 APR 2022 PM 74 SEATTLE WA 980 32A 0061827472 T From 98104 US POSTAGE \$00.53¹ **First-Class**

Sound Transit Projects

#504836 SBLE Draft Environmental Impact Statement Comments c/o Lauren Swift	
Octomed Themesia	
Date Recieved: Sound Transit 4/26/2022 401 South Jackson Street Seattle, WA 98104	
Created by: Re: Comments from Weyerhaeuser Company c/o Urban Visions (200 Occidental Avenue S, Seattle, WA 98104) on the Draft West Seattle and Ballard L	ink
Cecelia Gunn Extension (WSBLE) project draft environmental impact statement (EIS)	
Audience: Dear Ms. Swift: General Public Control of the second s	
Reach: Thank you for considering our comments on the draft EIS. Our letter focuses on the impacts and mitigation for the Chinatown-International District ("CID	')
Participation: segment, station and track alignment because that is the part of the larger WSBLE project that directly affects our interests in Pioneer Square. All alternatives will have sign the C-ID segment will be within the boundaries of the Pioneer Square Historic District or directly abutting it. Construction of all alternatives will have sign	ficant
Engagement: adverse impacts on Pioneer Square. We echo the comments, issues, and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested in the letter submitted by the Alliance for Pioneer States and mitigation ideas suggested and mitigat	square,
Source: and we offer the following comments specifically related to our own review.	
Assigned division: Outreach • The above-grade facilities that will be constructed to support the tunnel infrastructure are not clearly defined in location or scale within the urban fabric attention to urban design including interaction with public space and parks for street level activation must be addressed more clearly in the WSBLE proje • The loss of businesses due to ongoing construction will continue to push new tenants to other adjacent neighborhoods where construction and related	Close ct. impacts
Category: are not a factor. The WSBLE project does not adequately address continued mitigation to offset these potential losses for Pioneer Square.	
Project Phase: We reiterate what many have already said to date: we believe Sound Transit should study the Fourth Avenue shallow station (CID-la) alternative further, reduce impacts to transit and traffic, seek to shorten construction duration, and reduce costs. We believe this alternative meets more of the regional long transit needs than the other alternatives. It centers the new light rail station within the existing transportation hub, closer to more existing transportation, and event facilities, offering greater opportunity for infrastructure development that benefits the whole region, not just Seattle.	to -term ransit,
Environmental we request that Sound Transit communicate any alternative development studies and findings as soon as possible, and well before any formal NEPA or environmental documents are published. Draft EIS environmental documents are published.	other
We look forward to working with the Sound Transit Board of Directors, Sound Transit, and our City of Seattle officials to inform the decision to select the preferred alternative for this once-in-a-generation regional project.	right
Sincerely,	
Greg Smith	
Founder & CEO	



Corporate Office 4601 6th Avenue South Seattle, WA 98108 (206) 624-3215 uwajimaya.com

April 28, 2022

VIA EMAIL

West Seattle and Ballard Link Extensions Draft Environmental Impact Statement Comments c/o Lauren Swift Sound Transit 401 S. Jackson St. Seattle, WA 98104 Email: <u>WSBLEDEIScomments@soundtransit.org</u>

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

Dear Ms. Swift:

Uwajimaya Inc. wishes to provide the comments below on the West Seattle and Ballard Link Extensions (WSBLE) Draft Environmental Impact Statement (DEIS).

Uwajimaya is deeply invested in Seattle's Chinatown-International District (CID). As you are likely aware, our family-owned business has served the Puget Sound community for nearly 100 years. We own and operate the iconic Uwajimaya Asian Food and Gift Market, which serves as a cultural anchor in the community. In addition to the market, Uwajimaya owns several other properties that similarly contribute to the cultural and historic vitality of the CID. All of these properties are located immediately adjacent to the proposed CID Station Alternatives for the WSBLE. That means Uwajimaya, as a major landowner and key stakeholder in this important Seattle neighborhood, is part of a fabric of numerous businesses, neighbors and community organizations who will experience significant adverse impacts from the WSBLE CID Station Alternatives.

We support the transit mission of the WSBLE and appreciate Sound Transit's efforts to date. The DEIS reveals, however, that impacts to this historically marginalized community have not been adequately analyzed or mitigated. We ask that Sound Transit extend the current timeline for identifying a preferred alternative for the CID Station and use this additional time to conduct a more thorough, inclusive analysis of impacts. In the unfortunate event Sound Transit proceeds with its current timeline, we implore Sound Transit to select the CID-1a/4th Avenue Shallow option as the preferred alternative.

Even based on the limited analysis provided to date, it is clear that this is the only option that avoids crippling effects on the CID community. In support of these requests, below we detail Uwajimaya's historic and unique role in the CID, the special features of our neighborhood, our profound concerns regarding the inadequacy of the DEIS, and our proposed course of action.

I. Uwajimaya History and Current Role

Uwajimaya is a long-standing, family-owned business that not only operates the iconic Uwajimaya Market but also serves as a source of stability and familiarity for the Asian minority populations who live in and visit the CID, and who are integral to the neighborhood's history and identity. The first iteration of Uwajimaya was opened by the Moriguchi family in 1928 when Fujimatsu Moriguchi sold homemade fishcakes and other Japanese staples from the back of his truck to Japanese laborers working in the Tacoma area. Mr. Moriguchi and his wife, Sadako, then opened a small store in downtown Tacoma that continued to operate until the Moriguchi Family was sent to the Tule Lake internment camp in California during World War II. In 1945, after being forced to rebuild their business following the war and internment, the Moriguchi Family relocated and opened a new market in Seattle on South Main Street. In the 1960s, Uwajimaya expanded its vision by providing products from other Asian countries. Uwajimaya's success led to the opening of stores in other locations and the relocation of the Seattle store to its flagship location at 5th Avenue South and S Weller Street in the CID. Uwajimaya is still owned and operated by the Moriguchi Family to this day.

It is widely acknowledged that ancestral food plays a critical role for people of color to sustain their cultural identity. Uwajimaya is a bridge connecting our local Asian communities to their cultural identities through their ancestral foods and culinary practices. Uwajimaya is the largest retail business in the CID and one of the largest Asian markets in the Puget Sound, serving 2,500-4,000 customers daily. For the Asian community, Uwajimaya is considered a "taste of home" with unique and treasured ingredients not generally available in other grocery markets in the area. For those not of Asian descent, Uwajimaya is an opportunity to explore Asian culture and learn about other parts of the world.

Uwajimaya further fosters the cultural identity of the CID by hosting and sponsoring events throughout the year. For example, Uwajimaya hosts the annual summer festival, Natsu Matsuri, which brings more than 1,000 people to the CID. Uwajimaya also supports in-store events such as food fairs and cooking demonstrations, as well as neighborhood festivals such as Lunar New Year Celebrations, the Night Market, and Dragon Fest.

Beyond cultural benefits to Uwajimaya patrons and visitors, Uwajimaya also plays an important economic role with distinct benefits to people of color. Uwajimaya employs more than 100 people in the CID and more than 450 people companywide. People of color make up more than 80% of our workforce. Uwajimaya also includes a food hall with 12 independent food stalls that create additional jobs for individual tenants, most of whom are also people of color.

This economic impact extends beyond Uwajimaya Market to businesses that operate in adjacent properties owned by Uwajimaya. In addition to the Market, Uwajimaya owns the block bounded by S King Street, 6th Avenue S, S Weller Street and 5th Avenue S, known as the Uwajimaya North Block, which

includes the Nagomi Plaza. In 2016, Uwajimaya rehabilitated the 1928 Publix Hotel located on the Uwajimaya North Block with, in part, five commercial tenants. Three additional commercial tenants along with public parking are located in the Nagomi Plaza on the Uwajimaya North Block on the corner of 6th Avenue S and S Weller Street. These commercial tenants range from small minority owned local treasures, such as Hood Famous Cafe + Bar, to world renown businesses, including Iron Chef Morimoto's Momosan Ramen & Sake bar.

Uwajimaya's properties also provide much-needed housing in the CID. Uwajimaya's revitalization of the Publix Hotel includes 125 apartments, 20% of which provide affordable housing through the City's Multifamily Tax Exemption (MFTE) program. Uwajimaya also co-developed the Uwajimaya Village development, which included 176 apartments in 2000 and similarly used the MFTE program to provide 20% of the available units as affordable housing. Continuing this commitment to develop housing in the CID, in 2020 Uwajimaya began design and feasibility studies on two of our parking lot locations for potential innovative mixed-use projects that would collectively result in hundreds of thousands of square feet of new housing and commercial space.

The Moriguchi Family – a local family of color with a multi-generational legacy that endured internment – intends to continue our role as a steward of the cultural identity of the CID through thoughtful design, housing and commercial offerings, through both development and long-term ownership of property. The Publix Hotel rehabilitation utilized Federal Historic Preservation Tax Credits to renovate and extend the life of the contributing building within the National Register Historic District. Our plans to use our property to further develop housing and commercial activity in the CID are now on hold due to the potential impacts of the WSBLE, which include the possibility of Sound Transit condemning the Uwajimaya properties, as detailed below.

II. Features of the Chinatown-International District

The unique characteristics of the CID and its population demonstrate why Uwajimaya plays such a significant role in anchoring the cultural identity of this community. Sound Transit and City of Seattle's Racial Equity Toolkit Report (Current Draft, Feb. 2022) (**RET**) provides the following remarkable summary:

The C-ID station area is the only station area densely populated by communities of color in the WSBLE project corridor. A majority of C-ID residents are of Chinese ethnicity, but there are also sizable communities of residents of Japanese, Vietnamese, Korean and Filipino ancestry. People of color account for approximately 65% of the population, as compared to a citywide average of 34%, and more than half speak a language other than English at home. Approximately 82% of C-ID residents are renters, far higher than the city average of 53%, and 80% of housing units within a 10-minute walkshed of proposed station areas are rent-restricted or subsidized rental units. The median household income currently stands at \$33,500 per annum, approximately half the citywide median, and approximately 30% of households fall below the federal poverty level. The area also has higher-than-average proportions of elderly and disabled residents, and based on a 2020 C-ID Healthy Community Action Plan study, people living and working in the C-ID are less healthy than those in other neighborhoods in Seattle and King County, with an average lifespan seven years shorter than that of most well-off communities.¹

These residents are the heart of the CID and the heart of Uwajimaya. In turn, Uwajimaya provides a cultural backbone that binds these individuals to each other, their communities, and their heritage. Each statistic cited in the RET makes it clear that the decision regarding where to locate the CID Station is an equity decision – equity in terms of race, income, housing status and health. Sound Transit should select an alternative that considers and accounts for these equity issues and avoid selecting an alternative that creates greater disparity and further harm to this historically under-resourced community.

Uwajimaya and the CID also provide non-Asian communities the opportunity to experience aspects of Asian culture that are not widely shared throughout the region. As a result, Uwajimaya and the CID facilitate diversity awareness, cultural connectedness and inclusion. In light of recent horrible instances of discrimination against people of Asian descent following the outbreak of COVID-19, inclusionary spaces and opportunities to celebrate Asian culture are critically important. Uwajimaya and the CID are arguably the regional epicenter for residents and visitors to educate and immerse themselves in Asian traditions to gain appreciation and respect for these beautiful heritages.

Despite the critical role this region plays in our community's fabric, historically, the CID has disproportionately been subjected to adverse impacts from infrastructure projects in the area. This history goes back to the construction of rail lines that support King Street and Union Station, the evolution of I-5 and the construction of I-90 and SR-99. More recently, the Alaskan Way Viaduct Replacement Project, the Elliott Bay Seawall Replacement Project, the First Avenue Water Main Replacement Project and the Seattle Streetcar Project have all disproportionately impacted the CID. Cumulatively, these projects have kept the CID and neighboring Pioneer Square District in a state of near constant construction and upheaval. Some of these projects were unavoidable in terms of location, but the same is not true for the CID Station. Sound Transit still has the opportunity to thoughtfully consider and intentionally select a location that minimizes harm to the CID, its residents and businesses, and the broader community.

III. Inadequate Environmental Impact Analysis

The DEIS presents two Alternatives – the 4th Avenue Alternative, with a shallow (CID-1a) and deep option (CID-1b), and the 5th Avenue Alternative, with a shallow (CID-2a), shallow diagonal CID-2a),² and deep option (CID-2b). Although the DEIS does not identify a preferred alternative, the environmental analysis indicates Sound Transit's unstated preference for the 5th Avenue Shallow Alternative, particularly the CID-2a diagonal option. This is evidenced by the skewed analysis that underreports the comparative benefits of the 4th Avenue Alternative, while downplaying the adverse impacts of the 5th Avenue Alternative. **Although we maintain the DEIS does not adequately analyze**

¹ RET, p. 8, *see also* DEIS, §4.3.4.1.2, Table 4.3.4-1.

² As an administrative matter, the DEIS evaluates the CID-2a shallow and CID-2a shallow diagonal largely without any clear distinction between the two, even though the proposed stations are in two distinct locations and therefore logically have distinct impacts. In most of the DEIS, the analysis of the CID-2a option does not distinguish between the shallow and the shallow diagonal alternatives. That the DEIS does not consistently analyze the CID-2a shallow diagonal with specificity is an obvious error.

the environmental impacts of any of the CID Alternatives, the information provided to date confirms the 5th Avenue Alternative options would once again marginalize this important minority community. These options would further displace the cultural and societal benefits that the CID and Uwajimaya currently provide – and plan to provide more broadly in the near future, if the siting of the CID Station does not prevent them from occurring.

A. Connectivity

The DEIS states the purpose and need for the WSBLE is to "provide fast, reliable light rail in Seattle and connect dense residential and job centers throughout the Puget Sound region..."³ This opening purpose statement highlights that connectivity is the critical goal of the WSBLE and should therefore guide station selection. The WSBLE Station Planning Progress Report (a "complement to the DEIS") provides a succinct summary of connectivity for each CID Alternative. Regarding the entrances and connectivity to the 4th Avenue Alternative options, this report states "[t]he west entrance would offer convenient access to Pioneer Square, trains at King Station, and buses on the west side of 4th Ave S, while the east entrance would enhance Union Station as a gateway to the Chinatown-International District and offer convenient access to the existing light rail station, buses on the east side of 4th Ave S, and the S Jackson St buses and streetcar."⁴ In comparison, the same type of summary in the report for the 5th Avenue Station entrances and connectivity states "[t]he new station entrance would be convenient to the S Jackson St buses and streetcar and adjacent to existing and planned bike routes on 5th Ave S and S King St." – and that is it.⁵

The length of these descriptions speaks for itself, and a review of the design concept plans for each Alternative confirms the 4th Avenue Alternative provides greater connectivity within the community in comparison to the 5th Avenue Alternative.⁶ The RET also acknowledges the cumulative, but disjointed, transit centers in the CID and Pioneer Square that created a transit hub suffering from a lack of cohesion and connection.⁷

These acknowledgements of the need for connectivity and the greater benefits offered by the 4th Avenue Alternative are raised in the "complementary" documents to the DEIS, but not meaningfully discussed and analyzed in the actual DEIS. Instead, the DEIS focuses on temporary, individualized impacts to transit facilities and roadways during construction, and a few permanent impacts, all of which Sound Transit notes can be mitigated or addressed as riders begin using WSBLE more frequently, or other forms of transit.⁸ The DEIS therefore provides an incomplete analysis of connectivity impacts.

To remedy this deficiency, Sound Transit should delay its selection of a preferred alternative until after an adequate analysis is conducted. If Sound Transit disagrees and concludes it has met its obligations under SEPA to fully evaluate the transportation impacts of these alternatives, including

³ DEIS, §1-1.

⁴ WSBLE Station Planning Progress Report, p. 97.

⁵ *Id.*, p. 106.

⁶ DEIS Appendix J, p. 133-47.

⁷ RET, p. 10.

⁸ See e.g., DEIS, §3.12.3.1.3, §3.13.3.1.2.

specifically impacts to connectivity, then Sound Transit should select the 4th Avenue Alternative because it provides far superior connectivity in comparison to the 5th Avenue Alternative, which, as noted above, is a top priority for Sound Transit.

B. Property Acquisition and Displacement

The DEIS also fails to adequately evaluate property acquisition and displacement impacts. The DEIS notes the 5th Avenue Shallow Alternative would result in acquisition of 16-19 properties. But it does not clarify or consider that several of these properties are located in the cultural heart of the CID and owned by people of color.⁹ For example, the 5th Avenue Shallow Alternative would result in acquisition of the Uwajimaya North Development Lots.¹⁰ Located directly at the Historic Chinatown Gate, the Uwajimaya North Development Lots – which were recently contemplated for redevelopment by a local family of color, who have proven to be committed, multi-generational stewards of this cultural epicenter – will instead become a cut-and-cover construction site, presumably later to be redeveloped by someone, chosen by Sound Transit, through its surplus property disposition procedures. In stark contrast to the Moriguchi family, Sound Transit is a governmental entity without cultural connections and personal investment in this community. Even if Sound Transit is well intentioned about conveying its surplus property, the mere fact of taking private land from this community after all it has been through is shocking to consider. To say this is an unmitigable impact is an understatement.

During the years of CID Station construction, the Historic Chinatown Gate would be covered for protection.¹¹ The symbolism of Sound Transit literally covering up the Historic Chinatown Gate so that it can acquire CID property – from people of color – and strip this unique community of its historic identity would be a significant misstep and a repeat of historic public-project mistakes that we urge Sound Transit not to make. Sustaining community ownership of property is an invaluable metric that should be considered to the greatest extent possible, particularly in under-resourced communities like the CID.

The DEIS also explains construction staging will occur throughout identified construction limits and additional temporary construction easements may also be needed, but locations for these easements have not been identified.¹² The DEIS then further clarifies that "[w]ith the exception of potential temporary relocations needed for construction of the Alternative CID-2a diagonal station configuration, temporary construction easements would not permanently displace existing uses and are not anticipated to substantially disrupt existing uses, except where noted in Section 4.3.1.3."¹³ The DEIS then concludes this topic by indicating the CID-2a diagonal station could result in permanent displacement of 8 businesses, but does not actually indicate which businesses or parcels would be impacted by the need for these unknown "temporary" construction easements and "temporary" relocations. Thus, although the DEIS purports to consider these impacts, the public is left with no idea where these very significant impacts might occur. Given the CID-2a diagonal station location within the heart of the CID, we can

⁹ DEIS, §4.3.1.4, Table 4.3.1-2, Appendix L4.1.

¹⁰ Id.

¹¹ DEIS, §4.3.4.4.3.

¹² DEIS, §4.3.1.4.

¹³ *Id.* (Emphasis added.)

safely assume that these easements and relocations would similarly be located in and impact the heart of the CID.

The DEIS acknowledges the general cultural impact of displacement and construction on the community, to some extent, and confirms that the 5th Avenue Alternative options would cause the greatest impacts. Conversely, the DEIS states the 4th Avenue Alternative, shallow and deep options, "would not displace buildings within the heart of the CID neighborhood. These alternatives would place the new station entrances along the existing 4th Avenue corridor and a block farther away from the heart of the community."¹⁴ With respect to the 5th Avenue Alternative, the DEIS explains these options "would have the most business displacements... would displace some buildings and businesses at the edge of the neighborhood for station entrances... [and t]hese displacements may include businesses important to the community because of the history, strong cohesion, and long-standing community connections in the neighborhood."¹⁵ The DEIS further explains that "[c]onstruction of the station entrances and other surface components would result in localized construction areas within the CID, and the community would experience construction noise, visual changes, and detours as these elements of the project are built. [The 5th Avenue Alternative] would place these potential construction impacts closer to the community than [the 4th Avenue Alternative]."¹⁶ The DEIS also notes the 5th Avenue Shallow option would result in adverse access impacts directly on Uwajimaya, but it asserts, with little explanation, the 5th Avenue diagonal option will not create these impacts. Sound Transit proposes working with Uwajimaya to provide mitigation, but no discrete mitigation is identified in this context, nor does the DEIS specifically address any other displacements.

The DEIS analysis and mitigation to address impacts from acquisitions and displacements is inadequate and does not include the unique consideration that should be afforded to the CID. After decades of marginalization by other public projects and government decisions, the CID now is in the unenviable position of once again being disproportionately impacted by acquisitions and displacements in comparison to all other WSBLE station communities. Rather than repeating history with another culturally insensitive project in the CID, Sound Transit should further evaluate these important impacts, define specific and meaningful mitigation, and do so with the due consideration for – and participation of – this unique community.

C. <u>Air Quality</u>

The DEIS fails to analyze air quality impacts on the CID as required by Federal regulations. Recall the RET clarified that "based on a 2020 C-ID Healthy Community Action Plan study, people living and working in the C-ID are less healthy than those in other neighborhoods in Seattle and King County, with an average lifespan seven years shorter than that of most well-off communities."¹⁷ With this inequity lens, we would expect Sound Transit to exceed requirements to study air quality for this vulnerable population that already is experiencing significant health disparities. To the contrary, the DEIS states that "[a]ccording to Code of Federal Regulations Title 40, Section 93.123(c)(5), because the duration of major

¹⁴ DEIS, §4.3.4.3.3.

¹⁵ Id.

¹⁶ DEIS, §4.3.4.4.3.

¹⁷ RET, p. 8.

construction activities of the project would not exceed 5 years in any one location, construction emissions are considered a temporary impact and a project-level conformity analysis is not required."¹⁸ This conclusion is wrong.

It is true the applicable Federal regulation instructs that "each site" should be considered separately for purposes of calculating whether construction impacts are less than 5 years, but it does not indicate that "site" means individual construction of each structural improvement.¹⁹ Although the regulation does not expressly define "site," "site" cannot be logically interpreted to have such a narrow scope. The more reasonable interpretation is that "site" consists of the entire construction site of each station. Furthermore, the regulation instructs that when calculating the length of time, the activity to measure is the "construction phase", not "major construction activities." Therefore, the duration of construction as a whole should be considered. Under this more reasonable interpretation, the CID station triggers the 5-year threshold for project-level conformity analysis because every CID Alternative requires more than 5 years of construction. Furthermore, this additional analysis is more than merited when we take into account the disparate health status of this minority community. Sound Transit should take the necessary time to conduct this analysis before selecting a preferred alternative.

D. Noise

The DEIS similarly failed to adequately evaluate noise impacts on the CID community. The DEIS lists the Federal Transit Administration ("**FTA**") Category 1 and Special Building Noise Sensitive Receivers that were analyzed.²⁰ This list does not include any properties within the CID, but the entirety of the "Seattle Historic Chinatown District" is considered a special use that merits "special consideration." Per the FTA Transit Noise and Vibration Impact Assessment Manual, "historic sites" require "special consideration."²¹ "Historic sites" are defined to include any historic districts in the National Register of Historic Places.²² The "Seattle Historic Chinatown District" was added to the National Register of Historic Places in 1989 and includes a majority of what is commonly characterized as the CID today. Therefore, specialized analysis of noise impacts to the "Seattle Historic Chinatown District" is required. This analysis should address impacts to the Uwajimaya-owned Publix Hotel, which includes residential units, as well as Hing Hay Park, which serves as a centerpiece for outdoor cultural and recreational activity. Both of these are adjacent to the 5th Avenue Alternative construction area.

E. Historic and Cultural Resources

A significantly more thorough analysis of impacts of the CID Alternatives on the historic and cultural resources of the CID is critical and needed. The DEIS notes the CID is listed as a National Historic District with many historic buildings and spaces.²³ The DEIS then, in a few short paragraphs, acknowledges all the CID Alternatives would adversely affect the historic resources of the CID, and this

¹⁸ DEIS, §4.3.6.4.1.

¹⁹ See CFR 93.123(c)(5).

²⁰ DEIS, §4.3.7.1, Table 4.3.7-1.

²¹ See FTA Transit Noise and Vibration Impact Assessment Manual, §4.1, p. 24.

²² Id.

²³ DEIS, §4.3.16.1.1, Table 4.3.16-1.

acknowledgement is the extent of the analysis. The DEIS does not provide any evaluation of the nature of these impacts on the historic vitality of the CID community, or any other meaningful issue that should have been addressed in this context.²⁴ This omission is particularly concerning when dealing with a historically unique and marginalized community. Sound Transit should therefore delay selecting a preferred alternative until the impacts of the Alternatives on the historic resources of the CID have been thoroughly evaluated and appropriate mitigation identified in partnership with local community stakeholders.

IV. Requested Course of Action

As detailed above, the DEIS fails to provide a balanced and adequate review of the 4th Avenue and 5th Avenue Alternatives, and their multi-faceted impacts on the CID community. The inadequacy of this analysis and mitigation is particularly concerning in light of the equity issues present in this area.

We therefore ask that Sound Transit defer selection of a preferred alternative and conduct a more thorough evaluation of the impacts of the CID Alternatives – in partnership with key community stakeholders – and provide more meaningful and specific mitigation.

Additionally, we urge Sound Transit to incorporate more coordinated and inclusive planning into the CID Alternatives. Specifically, Sound Transit should address the community's vision for the Jackson Hub. The Jackson Hub concept plan was finalized in March 2019 through a coordinated effort led by the Alliance for Pioneer Square, Seattle Chinatown International District Preservation and Development Authority and Historic South Downtown. This coalition sought input from numerous government agencies, including Sound Transit. Based on this input and feedback from the community, the coalition produced a vision for a Jackson Hub as an activated and welcoming pedestrian-transit center that provides missing connections between the CID, Pioneer Square and the numerous transit corridors scattered throughout the area.

Similar to the WSBLE, the purpose of the Jackson Hub is to provide connectivity and enhance community vitality. However, the DEIS is oddly silent regarding coordinated planning to achieve this Jackson Hub vision. A cursory review of the CID Alternatives as they would relate to the Jackson Hub vision indicates the 4th Avenue Alternative is best positioned to foster connectivity in the Jackson Hub because of its closer proximity to the Jackson Hub and transit centers. The 4th Avenue Alternative therefore provides a unique opportunity to transform a largely under-resourced area into an active and lively center for the community. In contrast, the 5th Avenue Alternative would continue the disjointed status quo by drawing transit riders farther away from the Jackson Hub and nearby transit centers. The 5th Avenue Alternative would also require the transformation, and even destruction, of an existing vibrant cultural center. Regardless of the merits of each CID Alternative as they relate to advancing the Jackson Hub vision and preserving the cultural vibrancy of the CID, the DEIS simply failed to adequately analyze and consider these issues. For this additional reason, Sound Transit should take the time to further evaluate the CID Alternatives prior to selecting a preferred alternative, and that evaluation should include whether the CID Alternatives will help achieve the community's vision for the Jackson Hub.

²⁴ DEIS, §4.3.16.3.5

Related to coordinated planning, we understand Sound Transit negatively views the need to reconstruct the 4th Avenue Viaduct if the 4th Avenue Alternative is selected. We strongly urge Sound Transit and other agencies to treat this as an opportunity. The 4th Avenue Viaduct is more than 100 years old and will inevitably need to be reconstructed. Instead of undergoing two successive phases of construction to build the CID Station and then reconstruct the 4th Avenue Viaduct only a few years later, thereby increasing the overall construction impacts on the CID, these projects should be combined and coordinated to reduce impacts on the community and gain efficiencies in construction. This is an opportunity to reduce overall construction costs and the impacts to a community that already has weathered more than a decade of recent construction. We acknowledge such a coordinated effort will require a greater degree of planning and partnership, but the community and infrastructure benefits and commitment to safety are more than worth the additional effort. We therefore request Sound Transit defer selection of a preferred alternative until after it more fully explores the potential for achieving coordinated reconstruction of the 4th Avenue Viaduct.

As this process continues to unfold, we look forward to continued engagement and partnership with Sound Transit to assure the best Alternative is selected for the CID Station. The CID is a unique and treasured community that merits special consideration. We appreciate Sound Transit's continued outreach and listening to this community, because it is only through a deep understanding of – and meaningful engagement with – this community that Sound Transit will be able to make the right decision. As we mentioned at the beginning of this letter, the CID is our home. We are deeply invested in and connected to this community. We are willing to help convene a work group of key community stakeholders to review and advise on Sound Transit's analysis in focused conversations.

Thank you for your time and consideration of our concerns. Should you have any questions or wish to discuss this matter further, please feel free to reach out directly to me at <u>denise@uwajimaya.com</u> or (206) 336-2796.

Very truly yours,

Den

Denise Moriguchi President & CEO

Miye Moriguchi Real Estate & Facilities Manager

Kenneth Louie Vice President

cc: City of Seattle Mayor Bruce Harrell City of Seattle Councilmember Tammy Morales King County Executive Dow Constantine King County Councilmember Claudia Balducci Cairncross & Hempelmann April 26, 2022

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

Via email to <u>WSBLEDEIScomments@soundtransit.orq</u>

Re: <u>505 5th Avenue South - Comments on the West Seattle and Ballard Link</u> <u>Extension Draft Environmental Impact Statement</u>

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**"). 505 Union Station LLC ("**505 Union Station**") owns the building located at 505 5th Avenue South (the "**Building**") (APNs 8809700020 and 8809700070). The Building was constructed in 2000 and is one of the condominium units comprising the Union Station block generally bounded by South Jackson Street on the north, 5th Avenue South on the east, Seattle Boulevard South on the south, and 4th Avenue South on the west. Portions of the Condominium ownership extend under the 4th Avenue South Viaduct and across Seattle Boulevard South due to a street vacation approved in 1996 (Ordinance No. 118456).

The Building sits directly south of historic Union Station and supports 295,000 square feet of office and retail space and an estimated 1,500 employees. The Building is one of four office buildings in the Union Station block, with the other three comprising and an additional 580,000 square feet of office and retail space and supporting an estimated 2,900 employees, not including Sound Transit's occupancy of historic Union Station. An 1,150-stall parking garage, which takes access from 4th Avenue South, sits beneath the Building and beneath the 4th Avenue South Viaduct (the "**Parking Garage**"). 505 Union Station relies on the Parking Garage to serve visitors and employees working in the Building and in the other office buildings within the Union Station block.

505 Union Station looks forward to the expanded light rail network serving the region furthered by the WSBLE. Since beginning operations in 2009, Link Light Rail has served as 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 decisions about the final alignment and to educate stakeholders and the public about anticipated significant impacts resulting from the WSBLE. Based on the current iteration of the DEIS, 505 Union Station has concerns about the impacts of all the proposed Chinatown-International District ("CID") Alternatives. The 4th Avenue South alignment options (Alternatives CID-1a and CID-1b) have significant harmful impacts on the City's and region's transportation network and on the Building. The 5th Avenue South alignment options (Alternatives CID-2a and CID-2b) have significant harmful impacts on the CID neighborhood. Frankly, there is not an acceptable option for the CID Segment that has been studied. We encourage Sound Transit to go back to the drawing board to figure out how to reduce the construction duration in the CID Segment and come up with another alignment alternative that maintains intact downtown's primary transportation corridors and preserves the integrity of the CID neighborhood. To do this, 505 Union Station requests that Sound Transit retain a qualified construction contractor for the CID station area before deciding on a route alignment to explore additional creative and practical solutions for alignment options and to propose alternative designs that minimize harmful construction impacts.

This letter addresses gaps in Sound Transit's DEIS analysis regarding construction, operational, and cumulative impacts, and suggests additional mitigation measures that should be addressed in the Final Environmental Impact Statement (the "FEIS").

1. Construction Impacts to the Building Require Additional Analysis in the FEIS.

The estimated construction duration for the CID Segment is significant. The construction duration of all CID Alternatives is much longer than other WSBLE segments, with Alternative CID-1a construction scheduled to last for 9 to 11 years. Because of this decade-long construction duration, the construction impacts cannot be dismissed as temporary in nature. The FEIS should study methods to reduce the construction duration under all alternatives, but especially if Sound Transit decides to pursue Alternatives CID-1a or CID-1b, which have the longest construction durations.

The following construction-related impacts to the Building from the significant construction period require additional analysis and mitigation in the FEIS.

a. <u>Closure of the 4th Avenue South Viaduct in Alternatives CID-1a and CID-1b will</u> <u>have a Significant Impact on Traffic and Parking Access.</u>

Under Alternatives CID-1a and CID-1b, the 4th Avenue South Viaduct will be closed for up to 6.5 years. As noted in the DEIS, "[t]he primary [traffic] effects from construction would occur with the two 4th Avenue Build Alternatives (Alternative CID-1a* and Option CID-1b*), as described below. 4th Avenue South carries approximately 30,000 vehicles per day as a primary north-south arterial connecting SODO to Downtown Seattle. Closure of all or portions of 4th Avenue

South would result in substantial diversion of traffic throughout arterial and local streets within the Chinatown-International District and surrounding areas," DEIS Transportation Technical Report (the **"Transportation Report"**), pg. 4-123. This "substantial diversion of traffic" and associated effects due to the 4th Avenue South Viaduct closure should be more thoroughly analyzed in the FEIS.

To understand the impacts of the 4th Avenue South closure described in the DEIS, 505 Union Station retained Transportation Engineering NorthWest to conduct an independent review of the DEIS. The review concluded that more information is required to understand the detailed operational impacts of the CID Segment alternatives to the surrounding streets and intersections. In particular, the DEIS does not provide any level of service ("**LOS**") analysis results for the interim condition during the multiple years of construction, therefore it is not understood how closure of 4th Avenue South would impact surrounding streets and their LOS.

To understand the feasibility of a 4th Avenue South closure, Sound Transit must model and provide information on the predicted LOS for alternative routes through the CID and into Downtown, including in combination with the traffic impacts from street closures elsewhere along the WSBLE.

In addition to major traffic impacts, the closure of the 4th Avenue South Viaduct under Alternatives CID-1a and CID-1b would eliminate access to the Parking Garage for 4 to 6.5 years. As noted above, the Parking Garage currently provides 1,150 parking stalls, 290 of which are allocated to serve the Building. The DEIS does not account for the loss of these stalls during construction nor the permanent loss of 200 stalls. This will be a major impact to the tenants in the Building, particularly since the loss of parking will occur at a time with major vehicular, transit, and pedestrian disruptions during construction.

Loss of parking stalls under Alternatives CID-1a and CID-1b will also affect 505 Union Station's ability to attract and retain tenants. 505 Union Station's tenants depend on these parking stalls to provide convenient, accessible, and dependable parking for their visitors and employees within their office building. Without access to these parking stalls, visitors and employees will be forced to find other parking options – options which are few and far between within the CID neighborhood and will only become scarcer during WSBLE construction. Loss of parking will cause significant parking spillover demand in the neighborhood that must be analyzed in the FEIS.

b. <u>Vehicular and Transit Impacts Due to All Roadway Closures will have Critical</u> <u>Impacts to the CID Neighborhood and Must be Studied More Thoroughly in the</u> <u>FEIS.</u>

The following "Potential Roadway Closures" diagram for Alternative CID-1a illustrates the other major roadway closures anticipated around the Building for the 9 to 11-year construction duration. The north, south, and west approaches to the Building are fully or partially closed,

and most streets to the east of the Building are identified as streets with "potential traffic increase." The FEIS must acknowledge major employment centers, like the Building, and analyze how employee routes to and from the Building can be maintained during construction.



The outlook for Alternative CID-1b roadway closures, below, is equally concerning in terms of its potential impacts on road closures and detours through the CID community. Sound Transit must study how the various 4th Avenue South closure alternatives impact traffic congestion in the CID neighborhood and the LOS on adjacent streets, as well as access to Downtown.

Potential roadway closures



In either scenario, the traffic impacts will be significant, and more information is required to understand the detailed operational impacts of the CID Segment alternatives to the surrounding streets and intersections. As noted above, the DEIS does not include any information about anticipated traffic volumes on these detour routes nor their anticipated LOS. Sound Transit must study and provide information about how closures of 4th Avenue South will impact accessibility for the 30,000 vehicles a day that use 4th Avenue South, as well as the cumulative impacts those detours will create on adjacent streets in the CID and the Pioneer Square neighborhood, particularly when combined with other WSBLE road closures.

The FEIS also needs to fully analyze anticipated transit rerouting and service impacts from construction that will hinder Building employee travel to and from work. The DEIS highlights bus route and Seattle Streetcar disruption during construction. Transportation Report, Table 3-36. The DEIS states that Alternatives CID-1a and CID-1b would disrupt the Seattle Streetcar operations for two years. Pre-pandemic, the First Hill line alone carried more than 1.3 million passengers per year, and ridership is anticipated to grow exponentially with the completion of the Center City Connector and connection of the two existing lines. The Seattle Streetcar route provides an important transit connection through the CID neighborhood, Little Saigon, Yesler Terrace, and Capitol Hill. The low-floor boarding at sidewalk level makes the Seattle Streetcar a particularly important transportation method for vulnerable populations and individuals that use mobility devices to access medical offices in the First Hill neighborhood. Any ST3 alignment through the neighborhood should avoid service disruptions to the Seattle Streetcar.

The DEIS states that there would also be impacts to bus service during construction, affecting approximately 20 bus routes and 220-300 trips per peak hour. These trips would be diverted into Pioneer Square and the CID. However, the DEIS does not evaluate the adequacies of detour routes nor their resulting LOS during construction. It is unclear that adjacent streets can adequately meet these additional transportation demands or how resulting transit delays would impact ridership capacity or demand.

Overall, these closures cumulatively indicate hundreds of disrupted buses and trolleys per hour for many years during the construction period. The FEIS must detail how riders on these routes will reach their destinations in a timely, safe, cost-effective, and efficient manner with this level of transit disruption. The analysis in the DEIS also does not account for event traffic volumes or event demand levels for transit service, which will have a particularly significant impact on the CID neighborhood because of its proximity to the stadiums, the frequency of events, that event traffic often coincides with PM peak commute traffic, and the fact that multiple events often occur simultaneously. This too must be studied in the FEIS.

As part of its updated analysis, the FEIS must also study the condition in Alternative CID-1a that would close the existing Stadium Station for two years and shut down the entire existing light rail system between the CID Station and SODO Station for at least 6 to 7 weeks. These major disruptions in transit will have a significant adverse impact on the Building and the surrounding CID neighborhood. The FEIS needs to consider impacts on ridership levels and routes. Without

fully investigating and disclosing these impacts, the analysis will not include meaningful consideration of mitigation.

Alternatives CID-2a and CID-2b will also affect traffic and transit with service interruptions to the Seattle Streetcar under Alternative CID-2a. Significantly, Alternatives CID-2a and CID-2b will require closure of 5th Avenue S, which is adjacent to the Building, and serves over 200 buses per hour. Transportation Report, Table 3-36. In addition to affecting public transit, non-public transit commuters will also be significantly affected by construction impacts, including those who constitute the 4,500 to 5,500 average daily trips on 5th Avenue South and the 11,300 to 14,500 average daily trips on South Jackson Street. Transportation Report, Table 4-34. These closures cumulatively indicate thousands of disrupted buses, trollies, and vehicle trips per hour for the many years during the construction period. The FEIS must detail how commuters on these routes will continue to reach their destinations in a timely, safe, cost-effective, and efficient manner while maintaining existing ridership levels.

For all alternatives, particularly Alternatives CID-1a and CID-1b, Sound Transit should provide a detailed assessment of intersection LOS for the period during construction and related conditions for the following intersections:

- 4th Ave S/ S Jackson St
- 4th Ave S/ S Weller St Bridge (Union Station Garage Access)
- 4th Ave S/ Seattle Blvd S
- 5th Ave S/ S Jackson St
- 5th Ave S/ S King St
- 5th Ave S/ S Weller St
- 5th Ave S/ S Lane St
- Seattle Blvd S/ S Dearborn St
- 6th Ave S/ S Jackson St
- 6th Ave S/ S King St
- 6th Ave S/ S Weller St
- 6th Ave S/ S Lane St
- 6th Ave S/ S Dearborn St
- Seattle Blvd S/ 6th Ave S

In addition, the information in the DEIS fails to provide the assumptions used in the transportation analysis. At a minimum, the following should be made for public review:

- Synchro/analysis outputs at specific intersections, including, at a minimum, those listed above
- Detailed trip assignment of diverted traffic volumes and routing by segment and intersection, including bus routes and volumes
- Timing and sequencing of road closures, including overlapping closures
- Interim intersection and roadway channelization configurations, including lane geometry and turn restrictions

- Detailed assessment of how emergency vehicle routes would be impacted by the planned closures during the construction period
- Consideration of peak pedestrian crossing volumes, including analysis at the 4th Avenue South/South Weller Street Bridge (Union Station Garage) signalized intersection, especially at Sounder peak alighting to assess how pedestrian safety will be ensured in the context of construction
 - c. <u>Pedestrian Accessibility to the Building Due to Sidewalk Closures Must be Analyzed</u> <u>Further in the FEIS.</u>

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 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." Transportation Report, pg. N.1E-1. But this does not provide sufficient detail on sidewalk closures to understand how pedestrian routes will be maintained to the Building and throughout the CID neighborhood.

The FEIS must provide more information about anticipated sidewalk closures during construction. Sidewalk closures are a critical component of the environmental analysis, as these closures affect the actual and perceived safety of Building employees and visitors, CID community members, and the health of local retailers. This information cannot be coordinated and disclosed later. The DEIS discloses partial and full roadway closures due to construction. If there is not enough specificity around sidewalk closures, then the FEIS should assume a worst-case analysis and analyze sidewalk and bike path closures along all identified roadway closures.

Additionally, the FEIS needs to clarify whether the pedestrian Weller Street Bridge will remain accessible during construction. The Weller Street Bridge and pedestrian crossing play a critical role for pedestrian connections between King Street Station and Union Station, as well as to Link Light Rail and Sounder commuter rail. King Street Station remains a critical multi-modal hub for those traveling to and from Seattle, providing access to Amtrak and the Sound Transit Sounder trains, which supply convenient, reliable, cost-effective, and environmentally-conscious transportation options to a wide range of cities within the Puget Sound region and beyond.

It appears the Weller Street Bridge likely will not be accessible under Alternative CID-1a and CID-1b with closure of the 4th Avenue South Viaduct. ("Under Alternative CID-1a*, the 4th Avenue South access to the Weller Street Bridge would likely be closed, although a temporary pedestrian crossing of the construction area may be possible." Transportation Report, pg. 6-48.) The DEIS does not suggest an alternative pedestrian detour route, and there is no other direct pedestrian connection. If pedestrian access is lost, then the FEIS must disclose the anticipated durations and anticipated pedestrian rerouting of access to and from the Building to King Street

Station. These concerns are only exacerbated by the anticipated 6.5 year-closure of 4th Avenue South and the South Jackson Street full closure for up to two years in Alternatives CID-1a and CID-1b. Sound Transit must properly study the pedestrian impacts of these closures and propose reasonable means for pedestrian access, including the potential for a grade-separate pedestrian crossing.

Alternatives CID-2a and CID-2b also appear to affect pedestrian routes to the Building. Closure of 5th Avenue South from South Jackson Street to Weller Street, and other sidewalk closures associated with the CID-2a and CID-2b Alternatives will affect the ability for Building tenants and visitors to access the Building and for Building tenants to access neighborhood businesses.

d. <u>Cumulative Construction, Structural, Noise, and Vibration Impacts to the Building</u> <u>Must be Considered.</u>

The DEIS acknowledges that most of the CID Segment, including the Building, is in a liquefaction-prone area, but it does not meaningfully discuss the implications of this soil type. The FEIS must further analyze how this will impact construction techniques and demonstrate there will be no structural interference between the WSBLE project and the Building under all alternatives. The FEIS should also identify ongoing structural monitoring and contingency plans as a mitigation measure. In particular, 505 Union Station requests that regular noise and vibration monitoring be conducted on the Building and that construction techniques and timing are adjusted to minimize impacts on the Building. Reports should be provided to the facilities director on a regular basis. In addition, 505 requests that an exterior building survey be conducted before construction and at a regular interval during construction to ensure Building integrity, including changes to pavers in Building plaza located above the existing transit tunnel and CID station. Reports shall include photos and review exterior for cracks or changes.

The CID neighborhood is a vibrant collection of retail, residential, nonprofit, cultural, and office uses. While similar neighborhoods have successfully managed residential and commercial construction projects of up to 2 years, no neighborhood is equipped to survive 8-11 years of heavy civil infrastructure construction. There is no mitigation possible to offset the economic disruption created by the proposed construction activities. Under all alternatives, portions of the CID will no longer exist at the end of this construction duration.

Heavy civil construction projects pose a greater safety risk to the residents and organizations around these projects. The sheer volume of trucking activities required to excavate the tunnel and supply all the materials used to construct the line will subject the neighborhood to a continuous line of trucks degrading air quality, disrupting pedestrian and local traffic, placing pedestrians and motorist at risk, and generally degrading the quality of life for this neighborhood.

Alternatives CID-1a and CID-1b require major construction within the CID neighborhood and immediately adjacent to the Building for roughly a decade. This close proximity will have significant noise impacts to the Building, but will also affect the surrounding neighborhood,

especially given the extended time period the noise impacts will endure. Alternatives CID-2a and CID-2b will also create noise and vibration affecting the Building and surrounding CID neighborhood. The DEIS states "the vibration and groundborne noise-sensitive land uses in the Chinatown-International District Segment are primarily multi-family residences along 4th Avenue South and 5th Avenue South..." DEIS Noise and Vibration Technical Report, pg. 5-8. However, this analysis fails to consider the significant impact construction noise would have on local employers, neighborhood parks and open spaces, and office tenants and their workers in the Building. The effects of decade-long construction noise should be considered in the FEIS. As discussed below, under all alternatives, mitigation strategies in the FEIS must examine ways to shorten the construction duration in the CID neighborhood.

e. <u>Direct and Cumulative Economic Impacts Due to Major Business, Non-Profit, and</u> <u>Residential Disruptions in the CID Must be More Thoroughly Analyzed and</u> <u>Expanded in Analytical Scope.</u>

The CID neighborhood is being asked to shoulder a disproportionately long WSBLE construction duration. We are very concerned about the impacts to the neighborhood under all the CID Alternatives. The DEIS states 5 to 27 businesses will be displaced under the CID Alternatives. The DEIS defines these businesses as "mostly commercial or institutional" and "retail and service business that serve the local community." *See* page 4.3.3-8 of the Affected Environment and Environmental Consequences – 4.3 Ballard Link Extension. This is a limited view of business displacement, too focused on 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.

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 CID 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, the CID also supports a wide range of housing types, including affordable housing, with approximately 13,000 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.

As discussed above, during construction under all Alternatives, but especially Alternatives CID-1a and CID-1b, the Building will suffer major cumulative direct and indirect impacts, including loss of Building parking access, traffic delays, street closures, loss of safe pedestrian routes, transit interruptions and rerouting, noise, and vibrations. These construction impacts will result in a *de facto* displacement of the businesses in the Building. Leading up to the impactful construction period, there will likely be significant issues leasing the Building. Furthermore, the loss of employee density in the Building will have an effect on the surrounding CID neighborhood because there will be fewer employees to patronize the remaining CID businesses. The full range of business, non-profit, and residential displacement impacts, including economic impacts, must be analyzed in the FEIS.

2. Operational Impacts to the Building and Parking Garage Require Additional Analysis in the FEIS.

The long-term operational impacts to the Building and Parking Garage also require further analysis in the FEIS. Under Alternatives CID-1a and CID-1b, the 4th Avenue South Viaduct would need to be rebuilt. There is inadequate information about this subsequent project and its long-term impacts, configuration, and cost. The FEIS should provide at least schematic-level design and engineering plans for the rebuild to prove the project is feasible and so that its impacts and cost can be adequately disclosed. The FEIS should also clarify whether the 11-year construction duration includes reconstruction of the 4th Avenue South Viaduct.

From a transit perspective, both Alternative CID-1a and CID-1b would result in the permanent removal of the north-bound bus lane on 4th Avenue South and would reroute some bus routes to 5th Avenue South. The CID station is the largest transportation hub in the Pacific Northwest, with direct access to Sounder commuter rail, Amtrak service, the Seattle Streetcar, several regional bus lines, and nearby connections to the Washington State Ferry system. In the future, the CID station will also be the only transfer point between all three Sound Transit light rail lines. Removing surface transit capacity is short-sighted and will have negative impacts on the future of this regional transportation hub.

The DEIS notes that both Alternatives CID-1a and CID-1b would result in the elimination of the existing signalized southbound left turn lane access into the Parking Garage, which would hinder its usability and require inbound vehicles to circulate through the neighborhood. Transportation Report, pgs. 4-92 and 4-93. The Parking Garage provides 1,150 parking stalls, and approximately 40% of vehicles entering the garage use the southbound left turn lane access. If vehicles cannot turn left from the southbound left turn lane to access the Parking Garage, these vehicles will need to detour through the CID, causing additional traffic and greenhouse gas emissions. The FEIS must analyze the traffic circulation patterns and delays due to the loss of this left turn lane access.

3. Overall DEIS Concerns Common to All Alternatives

a. <u>The Cumulative Effects Analysis Must be More Robust and Consider a Wider</u> <u>Range of Foreseeable Impacts, Including Impacts due to the Ongoing Industrial</u> <u>and Maritime Strategy and Future Development Projects.</u>

The DEIS cumulative effects analysis does not reference the ongoing Industrial and Maritime Strategy work by the Seattle Office of Planning and Community Development ("**OPCD**"). The Industrial Lands work anticipates a complete overhaul of Seattle's industrial land use code. Areas near current and future light rail stations will receive a meaningful increase in development capacity, particularly in the vicinity of the CID Segment and the SODO Segment, and a number of industrial areas will be granted additional density to incentivize further industrial development.¹ OPCD will complete its own FEIS this summer, and it expects to adopt new regulations in early 2023. The cumulative effects analysis in the WSBLE FEIS must take these anticipated land use changes and increases in density into consideration. The changes will likely spur more development in industrial areas, potentially creating additional conflicts and concurrent construction impacts with the WSBLE work.

Additionally, the cumulative effects analysis must better account for future development projects in general. 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 the pipeline project list should be updated for the FEIS analysis. The FEIS should also acknowledge that future, simultaneous construction with identified pipeline projects is likely. Impacts from simultaneous construction 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." Transportation 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 numerous simultaneous construction projects requiring additional lane and sidewalk closures even beyond those projects that can be identified as pipeline projects now. The FEIS analysis needs to anticipate this highly likely outcome and build in a cushion for cumulative impacts from future development projects.

b. <u>Construction Sequencing Must be Decided Upon, Disclosed, and Analyzed.</u>

The cumulative impacts analysis 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.

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

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." Transportation Report, pg. 4-114. 505 Union Station requests that Sound Transit study and make known the construction sequencing and timing of all stations and road closures. This analysis is necessary to understand and mitigate the true totality of cumulative construction impacts.

4. Suggested Mitigation for Consideration 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 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.

- The construction impacts in the CID neighborhood are significant and harmful. The FEIS should continue to study alternative alignments and methods to shorten the construction duration.
- Study alternatives in the FEIS that would retain full access to the Parking Garage during construction and during long-term operations. Loss of full access to the Parking Garage is untenable.
- Maintain continuous access during construction to the South Weller Street Bridge or provide an equivalent grade-separate pedestrian connection.
- 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.
- Provide a mitigation plan to address stadium event volumes and event demand for transit services in the CID neighborhood. Consider pedestrian volumes associated with events in the neighborhood.
- Prepare comprehensive detour plans and routes that minimize traffic effects. Provide additional information about wayfinding signage and messaging within the CID neighborhood. Work with SDOT to ensure access is maintained to existing buildings and businesses.
- 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.
- Mitigate the impacts the WSBLE will have on access to parks and recreation opportunities. The CID neighborhood is home to 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.

- Under each alternative, include noise and vibration monitoring on the Building. Adjust construction techniques and timing to minimize Building impacts and report results on a regular basis to the facilities director.
- Conduct exterior building survey before construction and at a regular interval during construction to ensure Building integrity, including changes to pavers in Building plaza located above the existing transit tunnel and CID station. Include photos and review exterior for cracks or changes.
- Implement pedestrian safety measures due to roadway closures and increased traffic volumes around the Building.
- 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.
- Implement any other mitigation necessary to address direct and indirect WSBLE construction and operational impacts identified in the FEIS.

We look forward to continued engagement in the WSBLE EIS process and ongoing planning, and thank Sound Transit for your diligent work toward making the WSBLE a reality. We urge Sound Transit to identify and study less disruptive alternative alignments for the CID Segment.

Sincerely,

Edam Hale,

505 Union Station LLC

Ada M. Healey, Chief Real Estate Officer Vulcan LLC

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 Block 46 (912 9th Avenue N)

Dear Ms. Swift,

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

City Investors XXVIII 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, City Investors XXVIII 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, Allen Institute, and Institute for Systems Biology. 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. City Investors XXVIII LLC owns property at 912 9th Avenue N (the "Property"), which will be impacted by the WSBLE.

The Property is progressing through entitlements and will receive its Master Use Permit ("**MUP**") from the Seattle Department of Construction and Inspections ("**SDCI**") under Project No. 3035807 later in 2022 (the "**Proposed Project**"). The DEIS acknowledges an "office/retail" project in this location (using a different address), but it understates the site size by almost half, and it does not identify the Proposed Project as a proposed laboratory building, even though that use is reflected in the publicly available SDCI permitting plans. DEIS, Appendix K, Line 669, pg. K-41.

The Proposed Project is a laboratory building with approximately 240,000 rentable square feet of laboratory space and supporting office. *See* SDCI records on file under MUP No. 3035807. Upon completion, it will support 1,200 employees. The Proposed Project also includes approximately 218 below-grade parking stalls in an approximately 50-foot-deep parking garage, and it is expected there will also be 7000 square feet of below-grade laboratory space. *Id.* The laboratory space is designed to support biomedical research, including biological and chemical lab spaces. The Proposed Project will complement the existing laboratory uses on the block, and will include chemical and biological research. Lab spaces will have highly sensitive benchtop equipment and skid mounted equipment that require 24 hour – 7 days a week of non-disturbance. The future laboratory uses are highly sensitive to vibration and electromagnetic interruptions because active imaging, data collection, mixing, biological reaction and testing require controlled and consistent environments. Any variability to this environment can result in failed experiments, significantly impacting the validity and the timelines of the research.

The Proposed Project is expected to start construction in Q4 2022 and complete construction in Q1 2025. Thus, the Proposed Project will be built with operating laboratories when the WSBLE project construction begins. Alternative DT-1 passes the Property at the southwest corner. Alternative DT-2 is approximately a block east of the Property. As noted below, City Investors XXVIII LLC encourages Sound Transit to consider a hybrid preferred

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

alternative with a Terry Avenue station connecting to a Harrison Street station. This reconfigured alignment would likely pass near the Property. City Investors XXVIII LLC would support this configuration, but would encourage Sound Transit to study alternatives that do not pass directly beneath the Property and study the noise, vibration, and electromagnetic field interruptions on the future sensitive laboratory use in the Proposed Project.

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, City Investors XXVIII 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)
- 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. City Investors XXVIII LLC urges a full analysis of this hybrid approach in the FEIS.

i. <u>Impacts from Westlake Avenue closure during construction require</u> <u>further study.</u>

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

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

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 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 proposed at the Property.

i. <u>Vibration impacts to laboratory use in the Proposed Project requires</u> <u>analysis in the FEIS.</u>

As noted above, the Proposed Project 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 Proposed Project are Category 1 sensitive uses designed to accommodate physical research operations and should 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, pg. 4-8. For existing Category 1 buildings, site-specific data was collected and analyzed. *Id.*, pgs. 4-10 and 5-11. The DEIS analysis should account for the Category 1 sensitive uses in the Proposed Project.

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 Tables 6-14 and 6-25. This information is useful, yet concerning, because the Proposed Project will contain similar sensitive laboratory uses, but the Property is located closer to the light rail line construction and operation, possibly under Alternative DT-1, Alternative DT-2, and a hybrid configuration that combines stations at Terry Avenue and Harrison Street. Accordingly, City Investors XXVIII LLC has significant concerns about the impact of vibration impacts to the Proposed Project. 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 Property 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 even closer to construction will certainly have significant adverse vibration impacts. 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 for the Proposed Project. 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.

In addition to uses sensitive to vibration, laboratories in the Proposed Project will also contain uses and equipment sensitive to electromagnetic interruptions ("**EMI**"). The DEIS identifies other laboratories in SLU, including UW Medicine, with EMI sensitivities, but the

analysis does not identify the Property and its proposed 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 Proposed Project's laboratories. The FEIS analysis should also assume a worst-case level of sensitivity since the type of research to be conducted in these labs will change over time.

As noted above in the vibration discussion, Sound Transit conducted EMI analysis and 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. <u>The FEIS cumulative impact analysis must anticipate concurrent</u> <u>construction projects in South Lake Union.</u>

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. <u>The FEIS cumulative impact analysis must include details on construction</u> <u>sequencing.</u>

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, City Investors XXVIII 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,

adam Hale,

City Investors XXVIII LLC

Ada M. Healey, Chief Real Estate Officer Vulcan LLC

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 Block 48 (111 Westlake Avenue N and 110 9th Avenue N)

Dear Ms. Swift,

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

City Investors IV 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, City Investors IV 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, Allen Institute, and Institute for Systems Biology. 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. City Investors IV LLC owns property at 111 Westlake Avenue N and 110 9th Avenue N (the "Property"), which will be impacted by the WSBLE.

The Property is progressing through Seattle Department of Construction and Inspection ("**SDCI**") entitlements with Master Use Permits ("**MUPs**") expected in the next year. A residential tower is proposed at 110 9th Avenue N (MUP No. 3017321) and an office and laboratory tower is proposed at 111 Westlake Avenue N (MUP No. 3017320) with a shared below-grade garage connecting the two towers (collectively, the "**Proposed Project**"). The DEIS acknowledges an "office/retail" project at 111 Westlake Avenue N, but it does not include any information about the size of the project, or the anticipated depth of the parking garage. DEIS, Appendix K, Line 9, pg. K-18. The DEIS improperly notes the proposal at 110 9th Avenue N as a two-story commercial building, instead of a residential tower with hundreds of residents that will be impacted by the WSBLE project. *Id.* Line 326, pg. K-37.

The Proposed Project includes a laboratory and office building with approximately 400,000 rentable square feet of laboratory space and supporting office, and the residential tower will include 461 residential units. *See* SDCI records on file under MUP No. 3017321 and 3017320. Upon completion, the Proposed Project will support approximately 2,000 employees and 700 residents. The Proposed Project also includes approximately 774 below-grade parking stalls in an approximately 55-foot-deep parking garage, and it is expected there will also be 20,000 square feet of below-grade laboratory space. *Id.* The laboratory space is designed to support biomedical research including biological and chemical lab spaces. The Proposed Project will include chemical and biological research. Lab spaces will have highly sensitive benchtop equipment and skid mounted equipment that require 24 hour – 7 days a week of non-disturbance. The future laboratory uses are highly sensitive to vibration and electromagnetic interruptions because active imaging, data collection, mixing, biological reaction and testing require controlled and consistent environments. Any variability to this environment can result in failed experiments, significantly impacting the validity and the timelines of the research.

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

The Proposed Project is expected to start construction in Q1 2023 and complete construction in Q1 2026. Thus, the Proposed Project will be built with operating laboratory, office, and residential uses when the WSBLE project construction begins. Alternative DT-1 overlaps the Property on the east edge and the northeast corner. The proposed laboratory building is located on the east side of the Property, and the parking garage is 55 feet deep in this location. Alternative DT-2 is approximately a block east of the Property. As noted below, City Investors IV LLC encourages Sound Transit to consider a hybrid preferred alternative with a Terry Avenue station connecting to a Harrison Street station. This reconfigured alignment would avoid direct impacts to the Property, but we would still encourage Sound Transit to study the noise, vibration, and electromagnetic field interruptions on the future sensitive laboratory use in the Proposed Project.

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, City Investors IV 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)
- 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. City Investors IV LLC urges a full analysis of this hybrid approach in the FEIS.

i. <u>Impacts from Westlake Avenue closure during construction require</u> <u>further study.</u>

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.

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

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 Mere 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 proposed at the Property.

i. <u>Vibration impacts to laboratory use in the Proposed Project requires</u> <u>analysis in the FEIS.</u>

As noted above, the Proposed Project 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 Proposed Project are Category 1 sensitive uses designed to accommodate physical research operations and should 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, pg. 4-8. For existing Category 1 buildings, site-specific data was collected and analyzed. *Id.*, pgs. 4-10 and 5-11. The DEIS analysis should account for the Category 1 sensitive uses in the Proposed Project.

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 Tables 6-14 and 6-25. This information is useful, yet concerning, because the Proposed Project will contain similar sensitive laboratory uses, but the Property is located closer to the light rail line construction and operation under Alternative DT-1 at Denny Station. Accordingly, City Investors IV LLC has significant concerns about the impact of vibration impacts to the Proposed Project. 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 Property 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 even closer to construction will certainly have significant adverse vibration impacts. 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 for the Proposed Project. 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.

In addition to uses sensitive to vibration, laboratories in the Proposed Project will also contain uses and equipment sensitive to electromagnetic interruptions ("**EMI**"). The DEIS identifies other laboratories in SLU, including UW Medicine, with EMI sensitivities, but the analysis does not identify the Property and its proposed 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 Proposed Project's laboratories. The FEIS analysis should also assume a worst-case level of sensitivity since the type of research to be conducted in these labs will change over time.

As noted above in the vibration discussion, Sound Transit conducted EMI analysis and 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. <u>The FEIS cumulative impact analysis must anticipate concurrent</u> <u>construction projects in South Lake Union.</u>

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. <u>The FEIS cumulative impact analysis must include details on construction</u> <u>sequencing.</u>

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, City Investors IV 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,

Cida me Alaly

City Investors IV LLC

Ada M. Healey, Chief Real Estate Officer Vulcan LLC

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 Block 55 (530 Dexter Avenue N)

Dear Ms. Swift,

This comment letter is submitted on behalf of City Investors XII L.L.C. in response to the West Seattle and Ballard Link Extension (the "**WSBLE**") Draft Environmental Impact Statement ("**DEIS**") published by Sound Transit.

City Investors XII L.L.C. 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, City Investors XII L.L.C. 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

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

addition to major tech companies, South Lake Union is home to thousands of scientists conducting life-saving research at multiple biotechnology firms including nonprofits like Fred Hutchinson Cancer Center, University of Washington School of Medicine, Allen Institute, and Institute for Systems Biology. 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. City Investors XII L.L.C. owns property at 530 Dexter Avenue N (the "Property"), which will be impacted by the WSBLE.

The Property is the third development site on the block bounded by Mercer Street, 8th Avenue, Dexter Avenue, and Republican Street. The entire block was designed to include laboratory and research buildings, with the first two phases built out and occupied by the University of Washington School of Medicine. This third phase is now underway with the Seattle Department of Construction and Inspections ("**SDCI**"), Project No. 3039270 (the "**Proposed Project**").

The Proposed Project is a laboratory building with approximately 260,000 rentable square feet of laboratory space and supporting office. Upon completion, it will support 1,300 employees. The Proposed Project also includes approximately 193 below-grade parking stalls in an approximately 50-foot-deep parking garage, and it is expected there will also be approximately 6,000 square feet of below-grade laboratory space. The laboratory space is designed to support chemical and biomedical research. The Proposed Project will complement the existing laboratory uses on the block, and will include a mix of lab, lab support, and office space. The future laboratory uses are highly sensitive to vibration and electromagnetic interruptions because active imaging, data collection, mixing, biological reaction and testing require controlled and consistent environments. Any variability to this environment can result in failed experiments, significantly impacting the validity and the timelines of the research.

The Proposed Project is expected to start construction in Q3 2024 and complete construction in Q2 2026. Thus, it is likely the Proposed Project will be built with operating laboratories when the WSBLE project construction begins. Alternative DT-2 passes just north of the Property along Mercer Street. Sound Transit must study the noise, vibration, and electromagnetic field interruptions on the future sensitive laboratory use in the Proposed Project.

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

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, City Investors XII L.L.C. 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)
- 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. City Investors XII L.L.C. urges a full analysis of this hybrid approach in the FEIS.

i. <u>Impacts from Westlake Avenue closure during construction require</u> <u>further study.</u>

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.

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

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.

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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.

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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 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 proposed at the Property.

i. <u>Vibration impacts to laboratory use in the Proposed Project requires</u> <u>analysis in the FEIS.</u>

As noted above, the Proposed Project 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 Proposed Project are Category 1 sensitive uses designed to accommodate physical research operations and should 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, pg. 4-8. For existing Category 1 buildings, site-specific data was collected and analyzed. *Id.*, pgs. 4-10 and 5-11. The DEIS analysis should account for the Category 1 sensitive uses in the Proposed Project.

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 Tables 6-14 and 6-25. This information is useful, yet concerning, because the Proposed Project will contain similar sensitive laboratory uses, but the Property is located much closer to the light rail line construction and operation, and the Property is noted as within an "area of vibration or groundborne noise impact." *Id.*, Figure 6-9. Accordingly, City Investors XII L.L.C. 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 Property 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 even closer to construction will certainly have significant adverse vibration impacts. 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 for the Proposed Project. 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. <u>Operational electromagnetic impacts must be analyzed in the FEIS.</u>

In addition to uses sensitive to vibration, laboratories in the Proposed Project will also contain uses and equipment sensitive to electromagnetic interruptions ("**EMI**"). The DEIS identifies other laboratories in SLU, including UW Medicine, with EMI sensitivities, but the analysis does not identify the Property and its proposed 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 Proposed Project's laboratories. The FEIS analysis should also assume a worst-case level of sensitivity since the type of research to be conducted in these labs will change over time.

As noted above in the vibration discussion, Sound Transit conducted EMI analysis and 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. <u>The FEIS cumulative impact analysis must anticipate concurrent</u> <u>construction projects in South Lake Union.</u>

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. <u>The FEIS cumulative impact analysis must include details on construction</u> <u>sequencing.</u>

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, City Investors XII L.L.C. 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,

Cida m Dealey

City Investors XII L.L.C.

Ada M. Healey, Chief Real Estate Officer Vulcan LLC

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 Block 56 (401 8th Avenue N and 433 8th Avenue N)

Dear Ms. Swift,

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

City Investors XXII 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, City Investors XXII 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

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

addition to major tech companies, South Lake Union is home to thousands of scientists conducting life-saving research at multiple biotechnology firms including nonprofits like Fred Hutchinson Cancer Center, University of Washington School of Medicine, Allen Institute, and Institute for Systems Biology. 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. City Investors XXII LLC owns property at 401 8th Avenue N and 433 8th Avenue N (the "Property"), which will be impacted by the WSBLE.

The Property is progressing through Seattle Department of Construction and Inspection ("**SDCI**") entitlements with Master Use Permits ("**MUPs**") expected in the next year. A residential tower is proposed at 401 8th Avenue N (MUP No. 3017379) and a midrise residential structure is proposed at 433 8th Avenue N (MUP No. 3020826) (collectively, the "**Proposed Project**"). The DEIS acknowledges a residential building at 433 8th Avenue N, but it understates the proposed number of units by 53 units. DEIS, Appendix K, Line 23, pg. K-19. The DEIS understates the 401 8th Avenue N site size by almost half (using a different address), and it provides no details about the anticipated number of units. *Id.* Line 650, pg. K-40. Both projects have been in entitlements for years with publicly available records.

The Proposed Project includes a combined total of 473 residential units, and 20% of these units (95 units) are planned to be offered as affordable units under the City's Multifamily Tax Exemption program. *See* SDCI records on file under MUP No. 3017379 and 3020826. Upon completion, it will support approximately 720 residents. The Proposed Project also includes approximately 187 below-grade parking stalls in an approximately 39-foot-deep parking garage beneath the residential tower. *Id.*

The Proposed Project is expected to start construction in April 2024 and complete construction in January 2026. Thus, the Proposed Project will be built with operating retail and residential uses when the WSBLE project construction begins. Alternative DT-1 passes just south of the Property along Harrison Street. As discussed below, Sound Transit must further study the impact of the WSBLE on the hundreds of residents that will be living in the Proposed Project during construction.

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

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, City Investors XXII 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)
- 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. City Investors XXII LLC urges a full analysis of this hybrid approach in the FEIS.

i. <u>Impacts from Westlake Avenue closure during construction require</u> <u>further study.</u>

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.

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

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 different 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 prepared, 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 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 cumulative impacts due to pipeline projects and construction sequencing.

i. <u>The FEIS cumulative impact analysis must anticipate concurrent</u> <u>construction projects in South Lake Union.</u>

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. <u>The FEIS cumulative impact analysis must include details on construction</u> <u>sequencing.</u>

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.
- Implement any other mitigation necessary to address direct and indirect WSBLE construction and operational impacts identified in the FEIS.

In summary, City Investors XXII 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,

Cida m Deales

City Investors XXII LLC

Ada M. Healey, Chief Real Estate Officer Vulcan LLC

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 Block 57 (300 Dexter)

Dear Ms. Swift,

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

City Investors XXIX 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, City Investors XXIX 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

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

addition to major tech companies, South Lake Union is home to thousands of scientists conducting life-saving research at multiple biotechnology firms including nonprofits like Fred Hutchinson Cancer Center, University of Washington School of Medicine, Allen Institute, and Institute for Systems Biology. 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. City Investors XXIX LLC owns property at 300 Dexter (the "Property"), which will be impacted by the WSBLE.

The Property is in advanced stages of entitlements and will receive its Master Use Permit ("**MUP**") from the Seattle Department of Construction and Inspections ("**SDCI**") under Project No. 3025418 in the next several months (the "**Proposed Project**"). The Proposed Project will develop 210,000 gross square feet in a 160-foot tower with approximately 206 parking stalls in a 50-foot-deep parking garage. *See* SDCI records on file under MUP No. 3025418. The Proposed Project is anticipated to be an office building, but the Design Review Board approved an alternative taller height to accommodate larger floor-to-floor heights in case a laboratory tenant occupies the building. Upon completion, it will support approximately 1,040 employees.

The DEIS noted the Proposed Project in Appendix K, but it does not accurately reflect the project status. Appendix K says the Proposed Project completed Early Design Guidance, which is true, but Appendix K does not include subsequent entitlement progress. The Proposed Project completed Early Design Guidance on November 2, 2016. Since that time, the Proposed Project has submitted its MUP application, completed MUP application correction cycles, and completed the recommendation phase of design review. *See* SDCI records on file under MUP No. 3025418. The final correction responses were submitted on April 2, 2022.

The Proposed Project intends to start construction in 2023 and complete construction in 2025. Thus, the DEIS should account for the Proposed Project as an existing structure. Additionally, the Proposed Project means the site is not an appropriate candidate for construction staging, and Sound Transit should consider alternative options near the Harrison Street station. The DEIS should also acknowledge and analyze the possibility that the Proposed Project will include sensitive laboratory use.

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

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, City Investors XXIX 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)
- 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. City Investors XXIX LLC urges a full analysis of this hybrid approach in the FEIS.

i. <u>Impacts from Westlake Avenue closure during construction require</u> <u>further study.</u>

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.

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

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 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 cumulative impacts due to pipeline projects and construction sequencing.

i. <u>The FEIS cumulative impact analysis must anticipate concurrent</u> <u>construction projects in South Lake Union.</u>

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. <u>The FEIS cumulative impact analysis must include details on construction</u> <u>sequencing.</u>

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.
- Implement any other mitigation necessary to address direct and indirect WSBLE construction and operational impacts identified in the FEIS.

In summary, City Investors XXIX 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,

Cida m Deales

City Investors XXIX LLC

Ada M. Healey, Chief Real Estate Officer Vulcan LLC

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 Block 41 (230 Westlake Avenue N) and Block 48a (2211 Westlake Avenue N)

Dear Ms. Swift,

This comment letter is submitted on behalf of City Investors XV L.L.C. and City Investors IV LLC (collectively, the "**Owners**") in response to the West Seattle and Ballard Link Extension (the "**WSBLE**") Draft Environmental Impact Statement ("**DEIS**") published by Sound Transit.

The Owners 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.

I. WSBLE Impacts to properties identified to support the Denny Station.

City Investors XV L.L.C. owns property located at 230 Westlake Avenue N (referred to as "**Block 41**"). City Investors IV LLC owns property located at 2211 Westlake Avenue N (referred to as "**Block 48a**") (collectively, the "**Properties**"). Block 41 is currently used for surface parking and is zoned SM-SLU 175/85-280 with a maximum residential height limit of 280 feet and a maximum floor area ratio ("**FAR**") of 8 for nonresidential uses. Block 48a is currently landscaped and is zoned DMC 240/290-440 with a maximum residential height limit of 440 feet and a maximum FAR of 8 for nonresidential uses.

The Properties both received Letters of Impact from Sound Transit for the Denny Station. Block 41 would be required for the Alternative DT-2 Terry Avenue station, and Block 48a would be required for the Alternative DT-1 Westlake Avenue station. As discussed in more detail below, the Owners strongly support the Alternative DT-2 Terry Avenue station alignment for the Denny Station. Due to the significant impacts associated with the Alternative DT-1 Westlake Avenue station, the Owners strongly oppose the Alternative DT-1 Westlake Avenue station alignment and do not support the taking of Block 48a to facilitate this station location. City Investors XV L.L.C. would be willing to work collaboratively with Sound Transit to facilitate an acquisition of Block 41 if it would support the Alternative DT-2 Terry Avenue station.

II. 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, the Owners 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)
- 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. The Owners urge a full analysis of this hybrid approach in the FEIS, and look forward to discussing a disposition of Block 41 to facilitate Denny Station at Terry Avenue.

A. <u>Impacts from Westlake Avenue closure during construction require</u> <u>further study.</u>

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.

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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 year¹, 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

¹ Seattle Department of Transportation, 2020 Annual Streetcar Operating Report, October 2021. http://www.seattle.gov/documents/Departments/SDOT/Streetcar/2020_Streetcar_Operations_Report.pdf

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 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.

B. <u>Pedestrian and bike impacts of the Alternative DT-1 Westlake Avenue</u> <u>alignment operations and construction impacts for all alternatives must</u> <u>be analyzed in the FEIS.</u>

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.

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.
- 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.

• Implement any other mitigation necessary to address direct and indirect WSBLE construction and operational impacts identified in the FEIS.

In summary, the Owners support 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 look forward to engaging with Sound Transit to discuss the acquisition of Block 41 to support Denny Station at Terry Avenue instead of Westlake Avenue.

Sincerely,

Cida m Deales

City Investors XV L.L.C. and City Investors IV LLC

Ada M. Healey, Chief Real Estate Officer Vulcan LLC

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 South Lake Union Properties

Dear Ms. Swift,

This comment letter is submitted on behalf of an affiliated ownership group ("**Ownership Group**") in response to the West Seattle and Ballard Link Extension (the "**WSBLE**") Draft Environmental Impact Statement ("**DEIS**") published by Sound Transit.

The Ownership Group 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, the Ownership Group 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

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

addition to major tech companies, South Lake Union is home to thousands of scientists conducting life-saving research at multiple biotechnology firms including nonprofits like Fred Hutchinson Cancer Center, University of Washington School of Medicine, Allen Institute, and Institute for Systems Biology. 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. The Ownership Group owns property throughout South Lake Union (the "Properties"), which will be impacted by the WSBLE.

The Properties are located throughout South Lake Union as depicted on the following map with ownership entity, address, use, and approximate number of residents and/or employees noted on the chart following the map.

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



Site Name	Address	Owner	Use	Approximate Residents/Employees	Status
Sitka	1255 Harrison Street	City Investors XXIV L.L.C.	Residential - 384 units	580 residents	Built
Helm	602 Terry Avenue N	Lakefront Investors 1 LLC	Residential - 79 units	140 residents	Built
Mera	630 Boren Avenue N	Lakefront Investors 2 LLC	Residential - 70 units	130 residents	Built
Block 38	520 Westlake Ave N	City Investors IX L.L.C.	Office and retail - 347,000 rentable sf	1,740 employees	Built

Block 18	210 Minor Ave N	City Investors XCII L.L.C.	Residential - 118 units	180 residents	In permitting
Block 37	630 Westlake Avenue N	City Investors XI L.L.C.	Laboratory, office, and retail - 328,000 rentable sf	1,640 employees	In permitting
Block 77	700 Westlake Avenue N	City Investors XXX LLC	Laboratory, office, and retail - 200,000 rentable sf	1,000 employees	Future project
Block 79	701-753 9th Avenue N	Block 79 LLC	Laboratory, office, and retail - 476,000 rentable sf	2,380 employees	Future project
Block 59	500 Aurora Avenue N, 501 Dexter Avenue N, 525 Dexter Avenue N	City Investors XX L.L.C.	Residential - 108 units	160 residents	Future project
Block 63	700 Denny Way, 113 Dexter Avenue N	City Investors XV L.L.C.	Laboratory, office, and retail - 282,000 rentable sf	1,410 employees	Future project
Lake Union Piers (east and west)	901 Fairview Ave N and 809 Fairview Ave N	City Investors XIV L.L.C.	Commercial and retail: 59,460 rentable sf combined	300 employees	Built

Some of the Properties are developed with residential, office, retail, and parking uses, and already have residential and/or commercial tenants. Many of the Properties are pending redevelopment either in active permitting or with anticipated pipeline redevelopment.

With Properties spread out across the South Lake Union neighborhood, the Ownership Group looks forward to expanded light rail service through the WSBLE. However, the Ownership Group is concerned about the impact to accessibility, transportation, retail vibrancy, pedestrian safety, and the availability of amenities, particularly during the WSBLE construction. This letter is submitted on behalf of the Properties and expresses general, collective feedback about impacts in South Lake Union. Separate letters will be submitted for other properties, outside this list, with site-specific considerations.

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, the Ownership Group 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)
- 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. The Ownership Group urges a full analysis of this hybrid approach in the FEIS.

i. <u>Impacts from Westlake Avenue closure during construction require</u> <u>further study.</u>

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.

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

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 different 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 prepared, 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 mew 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 cumulative impacts due to pipeline projects and construction sequencing.

i. <u>The FEIS cumulative impact analysis must anticipate concurrent</u> <u>construction projects in South Lake Union.</u>

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 then assuming 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. <u>The FEIS cumulative impact analysis must include details on construction</u> <u>sequencing.</u>

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.
- Implement any other mitigation necessary to address direct and indirect WSBLE construction and operational impacts identified in the FEIS.

In summary, the Ownership Group 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,

Edom Laly

On Behalf of the Ownership Group

Ada M. Healey, Chief Real Estate Officer Vulcan LLC

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 Yesler Terrace Properties

Dear Ms. Swift,

This comment letter is submitted on behalf of the affiliated ownership entities noted below (the "**Ownership Group**") in response to the West Seattle and Ballard Link Extension (the "**WSBLE**") Draft Environmental Impact Statement ("**DEIS**") published by Sound Transit.

We appreciate the hard work and dedication Sound Transit staff and consultants have put into such a complex DEIS. The WSBLE is a monumental undertaking and requires Sound Transit to consider myriad perspectives, unique environmental concerns across a large geographic area, and feedback from all segments of our community. We also acknowledge the EIS process will continue to demand much from Sound Transit as you consider and respond to the many comments generated from the DEIS. Your hard work is evident and will help ensure the lasting success of the WSBLE. This project is deeply meaningful to our community and will advance equity, connectivity, and environmental goals that make Seattle and the Puget Sound region stronger. Thank you very much for your work in making the WSBLE a reality for our community.

The Ownership Group looks forward to the expanded light rail network serving the region through the WSBLE. 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 decisions about the final alignment and educate stakeholders and the public about anticipated significant impacts resulting from the WSBLE. Based on the current iteration of the DEIS, the Ownership Group has numerous concerns regarding potential significant impacts to the Yesler Terrace community, especially surrounding transit access.

I. The Ownership Group owns property in Yesler Terrace (the "Property"), which will be impacted by the WSBLE.

Yesler Terrace is a unique master planned community in Seattle. The site was transformed from 1940s public housing into a true mixed-use, mixed-income community supporting low-income, affordable, and market rate housing, commercial and medical uses,

community amenities, and open space. The Ownership Group owns the following residential sites in Yesler Terrace.

Site Name	Address	Owner	Use	Approximate Residents/Employees	Status
Batik	123	Yesler	Residential	290 Residents	Built
	Broadway	Investors	- 195		
		2 LLC	Units		
Cypress	123	Yesler	Residential	340 Residents	Built
	Broadway	Investors	- 237		
		2 LLC	Units		
Wayfarer/Yesler	1000 E.	Yesler	Residential	400 Residents	Under
4	Yesler	Investors	- 261		Construction
	Way	4, LLC	Units		
Cascara/Yesler	225	Yesler	Residential	520 Residents	In
8	Broadway	Investors	- 345		Permitting
		8 LLC	Units		

II. The WSBLE does not adequately consider, discuss, and address the impacts of disrupting the Seattle Streetcar.

The Seattle Streetcar provides an important service to the City, and especially the Yesler Terrace community. Since its inception, the Seattle Streetcar has steadily gained ridership every year, with the exception of the pandemic-affected years.¹ Pre-pandemic, the First Hill line carried more than 1.3 million passengers per year, and ridership is anticipated to grow exponentially with the completion of the Center City Connector and connection of the two existing lines. By connecting Yesler Terrace with First Hill and Downtown Seattle, the Seattle Streetcar delivers a convenient, reliable public transportation option for Yesler Terrace community members, including those living in affordable housing. Consistent access to the Seattle Streetcar is especially important for those community members who lack access to a personal vehicle. The Seattle Streetcar is a crucial form of transportation for medical workers and patients traveling to and from medical offices in the First Hill neighborhood. The low-floor boarding at sidewalk level makes the Seattle Streetcar accessible for vulnerable populations and individuals that use mobility devices.

Because the Seattle Streetcar connects the neighborhood to light rail, the Sounder and Amtrak train system, and a number of bus routes, impacts to the Seattle Streetcar likewise impact the Yesler Terrace community's access to these vital public transit systems. These impacts will only multiply with the completion of the Center City Connector project, which Sound Transit assumes will finish before WSBLE construction begins. *See* DEIS Chapter 3, page 3-127. As the Center City Connector project will connect the First Hill line with the South Lake

¹ Seattle Department of Transportation, 2020 Annual Streetcar Operating Report, October 2021. <u>http://www.seattle.gov/documents/Departments/SDOT/Streetcar/2020 Streetcar Operations Report.pdf</u>

Union line, impacts to the Seattle Streetcar will have reverberating effects on access throughout Downtown for Yesler Terrace community members. Any ST3 alignment should avoid service disruptions to the Seattle Streetcar.

Under Alternatives CID-1a and CID-1b, the Seattle Streetcar would experience significant impacts over an 18 to 24-month period, with a service interruption at the 5th Avenue South/South Jackson Street intersection. *See* Transportation Technical Report, page 3-49. This service impact would also occur under Alternative CID-2a, though for a shorter 6-month period. Sound Transit should avoid any closure of the Seattle Streetcar and study alternative approaches that avoid closures. Where limited closure of the Seattle Streetcar may prove unavoidable, Sound Transit should study alternatives that minimize the amount of time for such closures and should target no more than 6-month disruption.

To address such potential closures, the FEIS must analyze and disclose mitigation to ensure Seattle Streetcar patrons are equipped with the necessary, accessible, and reliable tools to still reach their destinations. This includes providing wayfinding information, ensuring adequate bus or similar public transportation options are available to accommodate Seattle Streetcar riders who are impacted by Seattle Streetcar closures, and ensuring walking and bike routes to and from Seattle Streetcar stations are accessible to allow patrons to access alternative modes of transit or their destinations. Because the Yesler Terrace neighborhood relies so heavily on the Seattle Streetcar, the mitigation strategies should be deployed in Yesler Terrace to provide riders information about potential Seattle Streetcar closures.

In summary, the Seattle Streetcar is an important tool for Seattleites, and especially for medical workers and medical patients needing access to medical care and the Yesler Terrace community, which contains a high number of community members that rely on public transit. The importance of the Seattle Streetcar will only grow through the Center City Connector project. Sound Transit should avoid closure of the Seattle Streetcar and ensure the FEIS provides a strong analysis of how any impacts to the Seattle Streetcar will affect patrons living in Yesler Terrace.

Sincerely,

Cida m Dealey

On Behalf of the Ownership Group

Ada M. Healey, Chief Real Estate Officer Vulcan LLC

April 28, 2022

VIA ELECTRONIC MAIL

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

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

Dear Ms. Swift:

We represent West Garfield LLC and Clark Barnes LLC (collectively, "Owner"). West Garfield LLC is the owner of the property at 1401 West Garfield Street ("Property") in the South Interbay area. The Property is currently developed with an office building housing the offices of Clark Barnes LLC, a Seattle architecture firm. This letter provides the Owner's comments on the West Seattle Ballard Link Extension Draft Environmental Impact Statement ("DEIS").

The Property is zoned IC-65(M), a designation that allows a wide range of commercial and industrial uses to a height of 65 feet. The Property is located directly across 15th Avenue West from the Smith Cove Station under the Preferred Alternative. DEIS, Figure 2-54. The Smith Cove Station is the northern terminus of the Ballard Link Extension Minimum Operable Segment ("MOS"). DEIS, pp. 2-77-2-78. This MOS applies to all the alternatives and design options. DEIS, p. 2-77. The Property is significantly impacted by the Project because it is identified for station-related uses if the MOS is constructed. DEIS, Appendix L, Figure L4.1-30e; DEIS, Table 4.3.1-4. The current uses on the Property would be displaced and the potential for future development consistent with the City's Comprehensive Plan and Land Use Code would be lost. If the MOS is not constructed, then the Property will suffer adverse construction impacts as well as permanent visual, light and glare, shadow and noise impacts, among others.

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. The Owner 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 MOS is the same across all alternatives and design options. DEIS, p. 2-77. The MOS at the preferred Smith Cove Station is of particular concern to the Owner because it would require the utilization of the Property for station-related purposes. The DEIS should consider different MOS termination locations. In addition, the DEIS should consider a range of locations for station-related uses at the MOS

Lauren Swift April 28, 2022 Page 2

termination points. For example, in the vicinity of the Property, there are other more suitable areas for station-related activities, including properties to the north that are already publicly owned. These alternatives would reduce the adverse land use impacts of the project, since the occupation of otherwise developable property by station-related activities will not only displace existing uses but also reduce the opportunity for development that is otherwise desired by the City.

2. Inadequate Analysis of Displacement Impacts

In locations where existing uses will be displaced, the project will wipe out future development opportunities, including attractive opportunities for Transit Oriented Development ("TOD"). Most importantly for the Owner, if the MOS is constructed terminating at the preferred location of the Smith Cove Station, the Owner's Property and the parcels immediately adjacent will be taken for station-related uses. In addition, the preferred route alignment in South Interbay would take out several future development sites on Elliott Avenue, all of which could one day includes jobs and housing to support the nearby Smith Cove Station. The non-preferred alternative in this location would preserve these future TOD sites. The DEIS fails to evaluate the impacts of displacement of new TOD development opportunities that result from the alignment and station location alternatives as well as the location of ancillary uses. Instead, the DEIS attempts to minimize these impacts by stating that land acquired for the Ballard Link Extension would account for less than 0.1 percent of the total land in Seattle. DEIS, p. 4.3.2-6. However, the relevant study area is the local neighborhood that is affected and the area of potential TOD development around each station, not the whole of Seattle. The DEIS also fails to identify adequate mitigation to reduce these impacts.

3. Inadequate Analysis of Land Use Impacts

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 current and future potential uses on the Property, due to displacement of existing businesses and future development opportunities. These impacts threaten achievement of the City's land use goals for vibrant development around stations, an impact not recognized by the DEIS. The DEIS also fails to identify adequate mitigation to reduce these impacts. *See* DEIS, p. 4.3.2-14 (stating no mitigation is required for land use impacts). To avoid these impacts, the project should avoid displacement and occupation of properties with development potential by ancillary uses such as those proposed for the Property.

4. Inadequate Information on Which to Base Analysis

The DEIS does not adequately describe the impacts to the Owner's Property or to nearby properties, including both temporary impacts during construction and permanent impacts such as visual and noise impacts resulting from the elevated tracks and station. 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 information about actual construction methodology, in order to determine noise, vibration, and earth movement impacts;

Lauren Swift April 28, 2022 Page 3

- No final information on scope of above-grade construction limits;
- No knowledge of complete street closure locations and durations;
- 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.

5. 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 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 final station locations and their design, final route alignments and their design, and construction methodology should require future SEPA review when facts and information are available to allow that review to occur adequately.

6. Inadequate Analysis of Construction Impacts

If the Property's uses are not displaced by MOS construction, the Property will still be particularly affected by construction due to its location immediately across the street from a proposed station. The DEIS fails to adequately analyze the traffic, noise, vibration, light and glare and dust impacts that will occur during construction of the project. The Property is also located in a liquefaction prone critical area and dewatering during construction may adversely influence the Property. Compounding this lack of analysis, the DEIS fails to identify mitigation to reduce the severity of construction impacts. Many impacts, including important noise and vibration 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. The DEIS fails to do so.

7. Inadequate Analysis of Permanent Impacts

The preferred alternative for the South Interbay segment of the project will have impacts on surrounding properties due to the fact that the stations and tracks are significantly elevated. These impacts include visual, light and glare, shadow and noise impacts, among others. The DEIS fails to fully analyze the impacts to nearby properties and businesses or to identify adequate mitigation. *See e.g.*, DEIS, p. 4.3.5-6 (with regard to visual impacts, stating only that the Smith Cove Station is "not near concentrations of sensitive viewers."). The analysis is cursory and conclusory. *See e.g.*, DEIS, p 4.3.5-9 (stating that light from Smith Cove Station would not have an impact on the surrounding area because it would be "designed in accordance with Sound Transit design measures," without discussing what lights are proposed or what design measures are included).

Lauren Swift April 28, 2022 Page 4

8. Conclusion

The DEIS fails to identify an adequate range of alternatives, fails to adequately disclose the impacts of the project in the South Interbay area, and fails to identify adequate mitigation. Sound Transit should not make decisions regarding station location or route alignment until these deficiencies are addressed and a complete environmental analysis is prepared.

Thank you for your consideration of these comments.

Sincerely,

Country Kaylor

Courtney A. Kaylor



WASHINGTON STATE BALLPARK PUBLIC FACILITIES DISTRICT

> 110 Edgar Martinez Drive South PO Box 94445 Seattle, WA 98124 (206) 664-3076

> > www.ballpark.org

April 28, 2022

WSBLE Draft Environmental Impact Statement Comments Sound Transit Attn: Lauren Swift 401 S. Jackson St. Seattle, WA 98104

via email WSBLEDEIScomments@soundtransit.org

Re: Ballpark PFD Comments on the WSBLE Draft Environmental Impact Statement

Dear Responsible Official:

The Washington State Major League Baseball Stadium Public Facilities District (PFD) appreciates the opportunity to comment on the draft environmental impact statement (DEIS) for the West Seattle Ballard Link Extension (WSBLE). The PFD is the public entity that developed and owns T-Mobile Park and has held the lease with the Seattle Mariners since the ballpark's opening. The PFD is responsible for overseeing this public asset and for ensuring that the public's investment in the ballpark is not compromised.

T-Mobile Park is located immediately to the west of the Stadium station. Current light rail ridership among ballpark fans is estimated at 8%-12%, and we expect that future ridership will only increase with the system expansion. Currently, among the fans arriving by light rail, the majority (85%) use the Stadium station. The remaining 15% of ballpark light rail ridership is divided between the Chinatown-International District (CID) and SODO stations.

The PFD wholeheartedly supports 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. Our comment letter is solely intended to provide feedback on the analysis presented in the DEIS and does not aim to endorse any one alternative.

What follows is a summary of impacts, mitigation, and requested further analysis for the WSBLE project. These comments largely mirror those made by the Seattle Mariners – our tenant – and we join in any further detailed comments that they submit on the Project.

BOARD OF DIRECTORS

Stacy Graven, Chair Carol Nelson, Vice-Chair Chris Marr, Treasurer Mike Fong R. Omar Riojas Andrea Sato

SODO Station

Many fans and visitors to the ballpark either use the SODO station or drive and park in the SODO area to the south of the ballpark. As such, our facility is impacted by decisions related to siting, construction, and operations of the selected station. In particular, the Final Environmental Impact Statement (FEIS) must identify and analyze pedestrian routes/experience between SODO station and the ballpark should, under CID-1a, the Stadium station be closed for up to two years. With the full closure of South Holgate Street under all three SODO alternatives, the Transportation Technical Report explains that significant truck traffic from this designated "heavy haul route" would need to be diverted, with Edgar Martinez Drive South and South Royal Brougham Way identified as likely routes. The FEIS must overlay these 900 peak hour vehicle trips, including "relatively high truck volumes," with event surge traffic for the anticipated two to three years and consider the vehicular and pedestrian impacts.

CID Deep Tunnel Options

The two deep tunnel options – CID-1b and CID-2b – would result in a new CID station either 190 or 180 feet deep, respectively, forcing future transit riders to use elevators as the primary method of ingress to and egress from the station. The impacts on utility and usability of the station caused by the reliance on these elevators (and the associated concerns with maintenance of this equipment) outweigh any short-term advantages provided by the deep tunnel options. When selecting the preferred alternative, Sound Transit should eliminate both these options.

Construction Impacts

<u>Closure of Stadium Station</u>: In option CID-1a the Stadium station would be closed for up to two years. As a majority of ballpark visitors arriving or departing by light rail use Stadium station, this closure would put additional pressure on the construction-related transit disruptions. The FEIS must analyze the impact of Stadium station's closure on T-Mobile Park. The DEIS does not address event surge conditions during the construction period, and it must be updated to analyze these conditions for the full construction duration, with particular attention to the two-year period of Stadium station's closure under Alternative CID-1a. In addition to the pedestrian routing and experience noted above in relation to the SODO station, the FEIS must also consider how pedestrians would get to and from the ballpark from the CID during this closure. Finally, there must be consideration of how potential increased driving as a result of the station closure would impact the availability of parking in the area. We would also note the impact these closures would have on the ability of the Mariners to meet their Transportation Management Plan, particularly during the 6 to 7-week period when the entire light rail line will be disconnected between the SODO Station and CID Station under Alternative CID-1a. In addition, the FEIS must address how would this closure affect parking availability as more attendees drive due to the disruption in light rail service.

<u>Construction Duration</u>: The CID alternatives anticipate substantial construction impacts to local and regional communities and transportation systems, not the least of which is the duration of construction. The FEIS should study methods to reduce the construction duration under all alternatives, but particularly in for CID-1a, whose construction duration the DEIS estimates at up to 9 to 11 years. In the DEIS Transportation Technical Report, Pg. 4-114, it states: "Detailed construction planning, including sequencing, will be provided in later phases of the environmental analysis once project design is sufficiently advanced." As part of the FEIS, Sound Transit must disclose any sequencing/phasing decisions in order to fully understand the impact of the construction duration.

<u>4th Ave Viaduct Rebuild</u>: Table 4-34 of the DEIS Transportation Technical Report states that 4th Avenue South supports 16,700 to 36,900 average daily trips as a conduit to and from Downtown Seattle and SODO. On Pg. 4-123, it further states: "Closure of all or portions of 4th Avenue South would result in

substantial diversion of traffic throughout arterial and local streets within the Chinatown-International District and surrounding areas." In particular, South Jackson Street and Edgar Martinez Drive would see "increased congestion and poor operations" and Edgar Martinez Drive and South Royal Brougham Way would see thousands of diverted daily commuters under CID-1a. The FEIS must consider how the addition of event surge traffic would further impact these arterials.

<u>Pedestrian Impacts</u>: Sidewalk closures are a critical component of the environmental analysis and heavily impact the operations of the ballpark. The FEIS must provide a fuller accounting of short- and long-term sidewalk closures for any CID preferred alternative. Additionally, the FEIS needs to clarify whether the Weller Street Bridge will remain accessible during construction. The DEIS Transportation Technical Report, Pg. 6-48, states: "Under Alternative CID-1a*, the 4th Avenue South access to the Weller Street Bridge would likely be closed, although a temporary pedestrian crossing of the construction area may be possible." If that is the case, then the FEIS needs to analyze the likely route from the existing CID Station to T-Mobile Park. As noted above, this pedestrian route will be particularly important during the two-year period Stadium Station is closed when more T-Mobile Park visitors will be using the CID Station to reach the ballpark.

<u>Transit</u>. The FEIS needs to fully analyze anticipated transit rerouting and impacts to service during construction. Table 3-36 of the DEIS Transportation Technical Report highlights the number of bus routes disrupted during construction, particularly under Alternative CID-1a, which would include closure of the Seattle Streetcar. These closures indicate hundreds of disrupted buses per hour for multiple years during the construction period. The analysis in the DEIS does not account for event volumes. And there needs to be focused analysis for the two-year period when Stadium Station is closed. This is a major gap in the analysis because there will be hundreds of games and events with very large crowds during the multi-year construction period.

<u>Parking</u>. Loss of parking around T-Mobile Park should also be evaluated in a game/event surge condition. With disruption to reliable transit options, the FEIS should consider an increase in vehicular use and analyze the impacts for events.

Operational Impacts

As noted above, the DEIS does not consider event surges in its analysis of alternatives. This has additional operational impacts to the ballpark. Both the ballpark and Lumen Field host over 100 events with attendance averaging over 25,000 throughout the year. Upon completion of the WSBLE, there would not be a stop at Stadium station for all lines. This means more riders will use the SODO station and CID station to access T-Mobile Park. This routing would have a similar impact to much of the ridership as closing the Stadium station for up to two years. The FEIS must consider the same questions related to pedestrian routing/experience resulting from the greater use of the CID and SODO stations by ballpark visitors.

Suggested Mitigation

Based on the impacts identified above and the impacts identified in the DEIS, the PFD joins the Seattle Mariners in encouraging consideration of the following mitigation measures in the FEIS.

<u>Construction Mitigation</u>: The FEIS needs to include a much more detailed mitigation analysis for the transportation and transit impacts during construction. The DEIS discussion of construction mitigation essentially states mitigation will be coordinated with the City of Seattle and King County Metro later. DEIS Transportation Technical Report, Pg.2 3-65 to 3-66. A complete environmental analysis must discuss thoughtful mitigation strategies. After the FEIS analysis is updated to disclose vehicular, transit, and

pedestrian impacts for games and events during construction, then the mitigation analysis must be updated with meaningful ways to address these construction impacts.

Based on the information available at this stage, the following construction mitigation measures should be the minimum considered in the FEIS:

- Wayfinding and other pedestrian enhancements through construction areas to allow continued access to T-Mobile Park through the surrounding neighborhoods.
- Wayfinding and other pedestrian enhancements from CID station and SODO station, particularly during Stadium station closure.
- Shuttle service to the ballpark during Stadium station closure under Alternative CID-1a.
- If complete closure of the light rail between the CID station and the SODO station is required, ensure the 6 to 7-week closure occurs outside the Major League Baseball season.
- A renewal of the free ride zone program down 1st Avenue to allow ballpark attendees to park downtown.
- Adequate bus service to the ballpark during gamedays in the rerouted bus configurations.
- Pedestrian safety measures due to increased traffic volumes around the ballpark.
- Reinstate the Park and Ride system to T-Mobile Park on gamedays.

Operational Mitigation

- Wayfinding and other pedestrian enhancements (including lighting, landscaping, painting, sidewalk improvements, etc.) from the CID station and SODO station to T-Mobile Park, because more riders will use those stations due to not all lines stopping at Stadium station.
- Wayfinding and other pedestrian improvements to address event surges during operations.
- Operational plans to address event surges.

Again, we appreciate the opportunity to comment and we look forward to working with Sound Transit as this project proceeds. If you have any questions, please call me at (206) 853-8571.

Sincerely,

Jóshua Curtis Executive Director, Washington State Major League Baseball Stadium Public Facilities District

Cc: Via Email Fred Rivera, Seattle Mariners PFD Board of Directors





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 regarding Draft Environmental Impact Statement for the West Seattle to Ballard Link Extension

Dear Sound Transit Board and Ms. Swift:

This joint comment letter is submitted by the Washington State Public Stadium Authority ("PSA") and First & Goal Inc. ("FGI") regarding the West Seattle to Ballard Link Extension Draft Environmental Impact Statement (DEIS). The PSA is the public agency that owns Lumen Field and Event Center ("Lumen Field"), one of the two existing, publicly owned sports and events venues in the Stadium District south of downtown Seattle. FGI is the master tenant and operator of Lumen Field. Lumen Field is home to the Seattle Seahawks, Seattle Sounders FC, and OL Reign, as well as the venue for more than 125 other cultural, artistic, and corporate events each year, drawing millions of patrons to the area.

The PSA and FGI are both eager for Sound Transit's proposed expansion of light-rail service through the West Seattle and Ballard Link Extensions ("WSBLE"). Many of our patrons utilize the existing light rail, as well as other transit services, to access Lumen Field. As explained in our comments below, we are concerned that Sound Transit has not yet taken the required "hard look" at the environmental impacts of its proposed light rail line, particularly on the surrounding historic neighborhoods (specifically the Chinatown International District ("CID"), Pioneer Square, and SODO) and on Lumen Field. The PSA and FGI believe that our strong partnerships with CID and Pioneer Square are essential to our success.

Below we have identified the additional analysis that we believe is necessary for Sound Transit to meet its obligations under SEPA and NEPA. We have also begun to develop a list of the mitigation measures that we believe are needed to address and offset the impacts to Lumen Field that are known or anticipated from the WSBLE Project at this point

800 Occidental Ave. S., Seattle, WA 98134

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based on the current level of environmental review. We also understand that Sound Transit has initiated a community based planning effort to engage with the CID neighborhood regarding the impacts from the CID segment and potential mitigation. We support this effort as strong advocates for the community.

Finally, as Sound Transit continues to expand its footprint and services in the CID, Pioneer Square, and SODO, we encourage the Sound Transit Board to view its continuing development and analysis of the CID segment and adjoining SODO and downtown segments as an opportunity to do more than meet its minimum obligations under NEPA or SEPA. We encourage you to recognize and act as an important player in the vibrancy and success of these long standing communities. This duty extends beyond providing additional transit services to include further enhancements to these areas based on engagement and feedback with these communities.

I. <u>Background regarding Lumen Field</u>

Lumen Field hosts roughly 200 events each year (some over multiple days) attended by approximately 2.25 million patrons annually. In addition to professional football and soccer, the facility hosts a wide variety of events including concerts, consumer shows, motorsport shows, trade shows, job fairs, meetings, and community events. Eighteen to twenty thousand people also tour the facility annually. The large number of diverse events held annually at the facility range from a single day to several weeks and bring between a few dozen and more than 69,000 patrons per event.

From 2008 to 2019 (pre-coronavirus pandemic), utilization of personal vehicles as a mode for reaching Seahawks games decreased by 22% in favor of public transit and other forms of transportation. This meant fewer than 50% of our fan base utilized their own automobiles. We continue each season to encourage this shift. However, there will always be a significant number of patrons who must use their vehicles – those arriving from outside the region, individuals requiring ADA accommodation, and a multitude of other factors -- prompting the need for adequate roadway capacity and access to parking. As Sound Transit is undoubtedly aware, parking supply in the areas surrounding Lumen Field is extremely challenged even on normal business days. Seahawks patrons park in pre-assigned parking areas surrounding the Field, including the Union Street Garage, the Lumen Field Garage, the T-Mobile Park Garage, the surface lot north of Lumen Field, and several structured parking lots east of Lumen Field. Recognizing the heavy utilization of passenger vehicles, the City of Seattle Master Use Permit ("MUP") for Lumen Field requires that PSA/FGI provide 5,774 protected parking spaces for event patrons at parking garages at and around Lumen Field. We meet that condition through a series of agreements reserving spaces in these several parking garages and lots.

Furthermore, event-related traffic is not limited to event attendees. FGI also coordinates access routes for move-in/move-out of events held at Lumen Field. For





example, the consumer shows - e.g., the Home Show, Boat Show, Auto Show, and RV Show - occur throughout the year at Lumen Field. It should be noted that the Boat Show requires special permits and vehicle escorts for the movement of oversized loads. Any disruption to these requirements could lead to the inability to host this major event. Each show generates roughly 30-40 deliveries by large semi-trucks in the 2-5 days preceding and following each event. For the RV shows, 450 RVs are driven to/from the facility. For stadium concerts (e.g., Luke Combs, Kenny Chesney, and The Weeknd), stage construction and associated setup typically rely on ~80 semi-trucks coming and going to Lumen Field in the days before and after the show. Finally, "motorsport shows", such as Supercross and Monster Jam typically involve transporting 500 truckloads of dirt to and from Lumen Field in the days before and after each event.

Lumen Field relies on the continued fluidity and functioning of the street network, access to on and off-site parking, and safe and accessible pedestrian routes. We are concerned about how Sound Transit's proposed CID segment, (and to a lesser degree the SODO segment), will impact these critical components of the stadium and event center's operations.

II. Recognizing and Supporting Our Neighbors

Lumen Field maintains a strong partnership with its Pioneer Square and CID neighbors. PSA and FGI see our strong partnership with the Pioneer Square and CID neighborhoods not only as supportive but maintaining their vibrancy is essential to the success of Lumen Field. During the development of Lumen Field, an expanded environmental review process was undertaken in partnership with neighborhood representatives to mitigate the impacts of construction and operations, as well as enhance the surrounding communities. All participants maintained a firm belief that they would benefit from thriving and safe neighborhoods, smooth traffic flow, and adequate parking availability. While the environmental review process is obligated to focus on significant adverse impacts, there was broad recognition and agreement to maximize the partnership by implementing mitigation measures that exceeded the scope of an Environmental Impact Statement (EIS). We encourage Sound Transit to consider undertaking a similar partnership approach to your environmental review and to develop a mitigation program that fully addresses and offsets the adverse impacts to the businesses and residents in these historic and diverse neighborhoods generated by the WSBLE construction and operation.

III. Comments regarding WSBLE DEIS

During scoping, the PSA and FGI jointly submitted a comment letter to Sound Transit and the FTA expressing our concerns regarding the potential impacts of CID segment construction on events at Lumen Field and impacts to the adjoining historic neighborhoods, the CID and Pioneer Square. In particular, we requested that Sound Transit and FTA evaluate the following impacts:





- Transportation impacts from the road closures and restrictions proposed as part of constructing the CID segment and concurrent events at Lumen Field, ranging from high-capacity single evening events (e.g. Seahawks games, concerts) to more routine, ongoing, moderate capacity events (consumer shows and other special events).
- Impacts to routes for large/oversized vehicles that need to access Lumen Field as part of load in/load out for numerous events each year.
- Impacts to the adjoining neighborhoods from planned (detour routes) and unplanned (cut-through traffic) that can be expected from long term closures of major transportation routes (e.g., multi-year closure of 4th Ave under both Alternative CID-1a and CID-1b).
- Cumulative impacts analysis capturing the combined impacts of numerous ongoing and upcoming development and infrastructure projects on traffic in the CID, Pioneer Square, and SODO neighborhoods.

Having reviewed the analysis in the DEIS, we have identified additional environmental concerns, including:

- Impacts from the CID segment construction on access to parking, particularly parking areas that are covenanted to meet the PSA's MUP required parking.
- Impacts from the CID segment construction on pedestrian access and connectivity, including impacts to access from transit stations and parking areas east of Lumen Field.
- Impacts to businesses and residents and thus the community in the CID, as well as business at Lumen Field.

Reviewing the DEIS, we did not find adequate consideration or evaluation of all of these environmental impacts and consequently request that Sound Transit complete additional analysis before proceeding to select a preferred alternative for the CID segment.

The DEIS covers substantial territory – both geographically and substantively. The consequence of the breadth of analysis is that many likely impacts are covered with insufficient detail. The impacts are often stated generally with little or no analysis of the effects of those impacts. Most notably, the DEIS explains that traffic will be detoured, but it does not analyze how well the detour route will function. Similarly, the DEIS explains that the CID segment will result in displacement of businesses and residents but provides no meaningful analysis of the effects of those effects of those displacements.

In addition, presumably in an effort to make the DEIS more accessible to the general public, the analysis contained in the body of the DEIS is fairly limited with significant cross-references to more expansive appendices, which total thousands of additional pages (e.g.,





Appendix N.1 alone is more than 900 pages). The consequence of this approach is that it is difficult for any reader to really understand the anticipated impacts of construction of various segments of the WSBLE, and in this case, for the PSA, FGI, and surrounding neighborhoods to understand the actual projected impacts of construction of the CID segment. Further, we found a number of discrepancies between the analysis and conclusions in various chapters of the DEIS and the appendices. Those discrepancies made it difficult to fully understand even the disclosed impacts.

In an effort to better understand the potential impacts of the WSBLE, and particularly the CID segment, the PSA and FGI hired an independent traffic consultant (Transportation Engineering Northwest or TENW) to review the DEIS and consolidate the various components of the transportation impacts analysis into a series of figures that visually capture and depict the anticipated impacts of construction of the CID segment. We have enclosed those figures to depict our understanding *at this point* of the impact of the CID segment to Lumen Field, particularly during the construction phase. These figures include:

- 4th Ave Shallow Alternative Construction Impacts (CID-1a) (Attachment A)
- 4th Ave Deep Alternative Construction Impacts (CID-1b) (Attachment B)
- 5th Avenue Shallow Alternative Construction Impacts (CID-2a) (includes Diagonal Station configuration) (Attachment C)
- 5th Avenue Deep Alternative Construction Impacts Construction Impacts (CID-2b) (Attachment D)
- Event & Truck Staging Impacts (CID-1a & CID-1b) (Attachment E)
- Traffic Diversion Impacts 4th Avenue S Closures (Attachment F)
- Road closures from West Seattle Bridge to CID (Attachment G)

The first four figures depict the impacts disclosed in the DEIS from construction of each of the four alternatives for the CID segment. The Event and Truck Staging figure depicts the roadways typically used by oversized loads and larger deliveries to access Lumen Field (event load in/load out), as well as the City of Seattle's designated freight network. The Traffic Diversion Impacts figure depicts how several of the key detour routes are expected to function during the closure of 4th Avenue. Finally, the West Seattle Bridge to CID road closure figure provides a more complete view of the combined impact of multiple road closures anticipated from the overlapping construction of several stations/segments at once.

The DEIS suggests that the anticipated lengthy road closures and other traffic and construction impacts are "not expected to notably affect attendance" at Lumen Field (or T-Mobile Park). DEIS at 4.3.3-14. We see <u>no</u> analysis to support this conclusory assertion. To the contrary, the PSA and FGI disagree, and anticipate that this lengthy construction schedule with its myriad of road closures (both sequential and overlapping) will adversely affect our ability to book events at Lumen Field. While Seahawks, Sounders FC, and OL Reign games





have longer term commitments to Lumen Field, many of the approximately 100 other events that occur at Lumen Field each year could choose to book elsewhere with fewer traffic and construction impacts during the lengthy construction period in the CID and SODO neighborhoods.

This direct impact on Lumen Field has a corresponding impact on businesses in the CID, Pioneer Square, and SODO neighborhoods. Restaurants, bars, and retail shops in each of these neighborhoods rely heavily on the patrons of Lumen Field to support their businesses. The impact of fewer events at Lumen Field "trickles down" to fewer patrons for businesses in these communities. Fewer events also translate into fewer opportunities for small neighborhood business participation in the operations of Lumen Field through its Community Concessions Program. This is a significant concern for the PSA and FGI that Sound Transit has not adequately considered – or mitigated – up to this point.

Details regarding the PSA and FGI's particular concerns are set forth below.

1. Impacts to Arterials and Potential Detour Routes

Both of the 4th Avenue alternatives (CID-1a and CID-1b) require full or partial closure of 4th Avenue over several years. Fourth Avenue is a primary access route for many patrons coming and going from Lumen Field. Encumbering 4th Avenue for between 6 and 9 years with ongoing construction would significantly and adversely affect those patrons and the various events that occur at Lumen Field. The 5th Avenue alternative (CID-2a and CID-2b) similarly rely on substantial road closures affecting pedestrian and vehicular movement in the CID, Pioneer Square, and the Stadium District. See Attachments A-D and G for our understanding of the locations and durations of closures.

While the DEIS acknowledges that these closures will require diversions to other routes, the DEIS contains limited information about potential detour routes and defers any final decisions on those routes until the "final design phase." (DEIS, p. 3-126). More importantly, the DEIS contains an insufficient analysis of the capacity of the potential detour routes to *actually* accommodate the additional traffic that will be diverted to them. The Transportation Technical Report, and particularly Appendix N.1D, identifies some of the roadways that are likely to accommodate the diverted traffic in the CID and reports their existing and future intersection levels of service. This analysis does not identify what percentage of the traffic Sound Transit expects to divert to what roadway or when, nor does it analyze the ability of the detour route to accommodate the added trips – that would be ongoing for months and often years.

In the absence of this information, the PSA and FGI asked TENW to conduct a highlevel analysis of the general roadway capacity of the likely detour routes to accommodate the added traffic – considering only the impact from the closure of 4th Avenue. See Attachment





F. (The DEIS was ambiguous regarding whether multiple roadways would be closed sequentially or concurrently.) While the DEIS analysis considers only the level of service ("LOS") at a limited number of intersections during peak hours of adjacent street traffic, TENW's analysis focuses on the segment capacity of the affected roadways. It should also be noted, that although not described as such in the primary DEIS transportation sections (Chapter 3), under either 4th Avenue CID station area closure, the parallel 5th Avenue S between Seattle Boulevard and Jackson Street would also be closed to general purpose traffic to preserve this local street for bus traffic. See Table 1 below.

Our limited independent review demonstrates that several of the routes that Sound Transit anticipates using to accommodate trips detoured from 4th Avenue South and 5th Avenue South (due to bus transit preservation between Seattle Boulevard and Jackson Street) would already approach or exceed capacity with the Project construction.¹ This includes segments of 1st Avenue S, S Jackson Street, 6th Avenue S, Maynard Avenue S, and Edgar Martinez Drive. For example, portions of both 1st Avenue South and South Jackson Street are already projected to operate at a volume to capacity ratio of over 1.0 (equivalent to LOS F) during CID segment construction in 2032. This plainly contradicts the idea that these routes are available to accommodate additional detour traffic and suggests that Sound Transit's currently proposed approach to detouring traffic will not work.

Importantly, this limited evaluation does <u>not</u> include the additional trips that would occur during events at Lumen Field or T-Mobile Park. It also does not consider the other concurrent roadway segment closures planned as part of the CID-1a and CID-1b alternatives, including the 2nd Avenue Extension, 4th Avenue S north of Jackson Street, Jackson Street itself, or S Main Street. Without analyzing and understanding how these projected road closures will actually impact vehicular and pedestrian traffic and circulation in the CID and surrounding neighborhoods, Sound Transit has not met its obligation to take a "hard look" at the impacts of the Project. Equally important, without this information, it is not possible for decision-makers or the affected neighborhoods to fairly evaluate the likely impacts of construction of the CID segment or to select an alternative for implementation.

¹ Level of service (LOS) analysis is a measure of the degree of congestion on a roadway or intersection. It considers vehicle operating speed, travel time, travel delays, and driving comfort. A letter scale from A to F generally describes LOS. LOS A represents free-flow conditions where motorists experience little or no delays. LOS F represents forced-flow conditions where motorists experience an excess of delay not normally considered acceptable, with excessive vehicle queuing and drivers waiting for multiple signal cycles.





Table 1

Segment V/C and LOS Calculations 4th Ave S Traffic Diversion Results Summary WSPSA ST3 (#2022-065)

Road Segment		2032 Baseline		2032 Partial 4th Ave Closure			Full 4th Ave Closure						
Street	From	To	ADT	V/C Ratio	LOS	Adjusted ADT	Remaining Capacity	V/C Ratio	LOS	Adjusted ADT	Remaining Capacity	V/C Ratio	LOS
4th Ave 5	Seattle Blvd S	5 Jackson St	29,700	0.88	D	11,880	Sector Sector Sector Sector			0			
1st Ave S	- Edgar Martinez Dr	5 Dearborn St	36,600	1.14	0.23	38,400	(6,290)	·1.20	E	39,600	(7,490)	• 1.23	E.
1st Ave S	S Dearborn St	S King St	26,600	0.79	C	27,900	5,900	0.83	0	28,400	5,400	0.84	D
1st Ave S	S King St	S Jackson St	12,700	0.86	D	13,300	1,520	0.90	0	13,600	1,220	0.92	E
Sth Ave S	S Dearborn St	5 Jackson St	WSBLE DEIS assumes 5th Ave 5 will primarily be used to accommodate diverted bus traffic from 4th Ave 5 closures.								-		
6th Ave S	S Dearborn St	S Jackson St	7,200	0.66	B	11,700	(780)	1.07	1	14,600	(3,680)	1.34	(R.)
Maynard Ave S	Seattle Blvd S	S Jackson St	7,500	0.69	B	12,000	(1,080)	1.10	E	14,900	(3,980)	1.36	Ŧ
S Jackson St	Alaska Way 5	1st Ave 5	19,200	1.64	F	22,700	(11,000)	1.94	F	22,700	(11,000)	1.94	E
S Jackson St	1st Ave S	2nd Ave S	12,200	1.04	E	14,400	(2,700)	1.23	F.	14,400	(2,700)	1.23	3
S Jackson St	2nd Ave S	4th Ave S	12,200	0.56	-	14,400	7,570	0.66	B	14,400	7,570	0.66	B
S Jackson St	4th Ave 5	8th Ave S	12,500	0.57		14,800	7,170	0.67	В	14,800	7,170	0.67	B
Airport Way S	6th Ave S	I-5 Ramps	9,500	0.43		16,700	5,270	0.76	C	21,300	670	0.97	E
S Royal Brougham Way	4th Ave S	1st Ave 5	2,900	0.27		2,900	8,020	0.27	A	2,900	8,020	0.27	12.
Edgar Martinez Dr	4th Ave 5	1st Ave S	32,200	1.00	E	32,200	(90)	1.00	Ē	32,200	(90)	1.00	F
Alaskan Way S	S Dearborn St	Yesler Way	38,700	0.72	C	40,600	12,845	0.76	C	41,300	12,145	0.77	C
Yesler Way	8th Ave S	2nd Ave S Ext	8,000	0.73	С	8,000	2,920	0.73	C	8,000	2,920	0.73	С

Assumptions/Notes: 1) 2032 construction year with 0.8% annual background growth rate. Background growth rate consistent with WSBLE DEIS.

JN/S traffic would primarily be diverted only to other N/S streets except for 5 Jackson St.
Partial closure of 4th Ave S would result in 60% of reduction in ADT and subsequent diversion to other streets.

4) 10% of diverted traffic would be rerouted to regional highway (I-5, SR 99, or I-90).

5) Assumed 50% of diverted 4th Ave 5 volumes are rerouted to 6th and Maynard Avenues, with 80% of this subset also rerouted via Airport Way 5.
5) Assumed remaining 40% (100% - 10% - 50% = 40%) diverted to other N/S arterials/segments.
6) Assumed 20% increase in volume on S Jackson St to account for rerouted traffic traveling between N/S arterials.

7) Both scenarios assume 4th Ave 5 closures <u>only</u>. Additional simultaneous closures would have additional impacts on traffic diversion in the vicinity. B) Segment capacity assumed to be equivalent to upper LOS E ADT threshold per Florida DOT QLOS methodology. LOS thresholds determined based on these values and standard v/c ratios.





A. <u>Request for Supplemental Transportation Analysis</u>

Another omission from the DEIS's analysis of transportation impacts from the CID segment is any consideration of the combined impacts of events at Lumen Field and the impacts from construction of the CID segment. Operations and events at Lumen Field are a pre-existing, baseline condition. The PSA evaluated the environmental impacts of activities at Lumen Field as part of the original permitting for Lumen Field in the late 1990s. The DEIS's traffic impact analysis focuses exclusively on the PM peak hour (DEIS, Appendix N.1, Section 4.3.3), and does not consider or evaluate how the confluence of construction impacts from the CID segment will overlap and create cumulative impacts in the surrounding area. Further, because the DEIS does not analyze this potential combination of impacts, Sound Transit, as well as the PSA and FGI, have a very limited ability to identify appropriate mitigation measures that would potentially address the additional impacts generated by the CID segment construction.

To remedy this deficiency, the PSA and FGI request that Sound Transit prepare a supplemental transportation analysis that considers the transportation impacts of Alternatives CID-1a (4th shallow) and CID-1b (5th shallow) using the following event scenarios:

- 1. Weekday evening Seahawks football game (70,000 attendance)
- 2. Weekday evening Stadium Concert (50,000)
- 3. Weekday evening Sounders FC match (25,000 attendance)
- Dual events Sounders FC match (25,000) and Mariners game (35,000-40,000). This could be a simultaneous or sequential event on the weekend or weekday evening. Combined attendance 53,000-60,000
- 5. Sunday afternoon/evening Seahawks football game (70,000 attendance)

This analysis should consider, at a minimum, impacts to vehicular traffic, pedestrian and bicycle access, and parking. It also needs to consider the adequacy of the capacity of the roadways identified for detours, as well as the possibility of "cut through" traffic (in which drivers use minor roads to avoid congestion on main arterials and other designated detour routes). Specifically, the analysis should provide *detailed estimates of diverted traffic volumes* to any impacted street in the vicinity of the CID road closures. As previously described, the DEIS in its current form merely lists the potentially impacted street and provides estimates of diverted traffic volumes to the entire group, not individual streets. While these are related to construction impacts, the extent of construction duration of several of the CID roadway closures become an ongoing continuous traffic impact for a significant period.

We have not requested that Sound Transit conduct this analysis for either of the deep station alternatives (CID-1b or CID-2b) because the PSA and FGI do not support either of those options. Both of the deep tunnel alternatives rely on elevators (rather than escalators or stairs) to move passengers from the tunnel to the surface. The PSA and FGI do not consider this a reasonable alternative as elevators are not adequate to move the large volumes of passengers who

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would one day use light rail to access events at Lumen Field. Long queues at elevators would present a strong disincentive to using transit to come to games or concerts at Lumen Field as the anticipated station access time would make transit less competitive with other modes, such as passenger vehicles. Further, it is our understanding that Sound Transit has historically had difficulty ensuring consistent, continuous operations of its elevators at other stations, so we expect that the deep tunnel alternatives are not likely preferred by Sound Transit as well.

2. Impacts to Parking for Lumen Field, including MUP required parking

The analysis of impacts to parking from construction of the CID segment contained in the DEIS is difficult to follow, in part because the analysis is spread over several different sections and the conclusions do not appear to be internally consistent. For example, Section 3.19.3.3 states that "Alternative CID-1a* and Option CID-1b* are not expected to impact parking during construction." At the same time, this section also refers readers back to Table 3-26 (permanent impacts) for "potential parking temporarily removed during construction of the guideway and stations." DEIS, p. 3-128. This Table explains that both 4th Avenue alternatives could remove about 200 off-street parking spaces. DEIS, p. 3-105.

Neither of these statements is correct or fully discloses the likely impacts of the CID segment during construction. While FGI has made substantial progress in our efforts to move patrons from passenger vehicles to transit and other travel modes over the last two decades (see Lumen Field Transportation Management Plan, Attachment H), significant portions of our patrons continue to visit Lumen Field by car. Correspondingly, and as noted above, the City of Seattle MUP for Lumen Field requires the PSA and FGI to maintain 5,774 parking spaces to support activities at the facilities. Those parking spaces are spread over several parking structures and lots around Lumen Field, including Union Street Garage, the North Lot, the Stadium Exhibition Center garage, the T-Mobile Field garage, and the Metro Garage (depicted on Attachments A-D). The DEIS does not acknowledge that construction of Alternative CID-1a (4th Avenue shallow) could fully block access to the 900 MUP-required parking space in the Union Station Garage depending on construction and road closure sequencing (which is not described in detail in the DEIS). Under CID-1b (4th Avenue deep), one of two ingress/egress points to the Union Street garage would be inaccessible, forcing hundreds of Lumen Field patrons to a single entrance/exit before and after an event. Further, construction of Alternatives CID-2a and CID-2b would at least partially block access to the Metro Garage for 6 to 9 months.

Even if CID segment construction does not fully block access to these parking areas, it will significantly affect access to these and other parking areas. The North Lot at Lumen Field includes 591 parking spaces that are also designated to meet the MUP parking requirements. The 4th Avenue and Jackson closures will substantially restrict access to the North Lot. Similarly, the road closures planned as part of Alternatives CID-1b (5th Ave shallow) and CID-2b (5th Ave deep) will limit access to the Stadium Event Center garage.





Overall, the additional traffic congestion and detour routes will make it more difficult for patrons to access those parking spaces and staging areas for events. Finally, the DEIS acknowledges that project construction will further reduce available parking supply by eliminating on street parking and due to demand from the construction employees. DEIS p. 4.3.3-13 through 4.3.3-15.

While the DEIS acknowledges at least some of these losses, it does not offer adequate mitigation (Section 4.3.3.6) for the negative impacts that these parking reductions will have on Lumen Field or the other existing businesses in the CID and Pioneer Square. In particular, Sound Transit must ensure that all of Lumen Field's MUP-required spaces remain accessible throughout construction or provide other mitigation. Further, Sound Transit must also identify 200 *permanent* parking spaces to replace the 200 spaces that will be permanently removed from the Union Station Garage and which are part of the PSA's covenant protected parking to meet Lumen Field's MUP parking requirements. (See further discussion in the Mitigation section 7 below and Attachment I.)

Finally, the PSA and FGI request that Sound Transit analyze how its construction traffic impacts are likely to affect the efficacy of Lumen Field's MUP-required TMP. That TMP notes the major factors "challenging the resiliency of the TMP include: access route interruption due to major road construction; significant reductions in nearby off-site parking supply ...; and continued decrease in on-street parking supply and availability...." Attachment H, p. 3. Sound Transit's construction of the CID and SODO segments of the WSBLE, or both, will trigger each of these challenges. Consequently, the PSA and FGI anticipate that this construction may necessitate changes to the Lumen Field TMP to continue to achieve the defined targets for reducing the number of cars per attendees during Lumen Field events. Evaluating the TMP will also help Sound Transit properly estimate the vehicular and pedestrian traffic generated by various events at Lumen Field, which will be a necessary input to the traffic analysis requested above.

3. Impacts to Large Vehicle Load In/Load Out

As with vehicular traffic and parking, the DEIS reports that road closures during construction will affect traffic in the CID and SODO neighborhoods (e.g., "[d]uring these closures, traffic is expected to be rerouted to other streets, such as 1st Avenue South and 6th Avenue South." DEIS, p. 3-136), but the DEIS does not analyze the capacity of these roadways to handle the increased freight and large vehicle impacts. If construction of the CID station will require closure of the existing freight route, Sound Transit must provide adequate alternatives for the duration of its project. See Attachment E for impacted routes.





4. Impacts to Pedestrian Access to Lumen Field

Large numbers of the patrons attending events at Lumen Field come and go from areas east of 4th Avenue South. According to survey data recorded by FGI in 2019, approximately 10,000 patrons per hour cross 4th Avenue South to access Lumen Field before and after a Seahawks game (approximately 70,000 attendees), and approximately 3,000 patrons per hour cross 4th Avenue via either Jackson Street or the Weller Street bridge to access mid-sized events (> 20,000+ attendance). The DEIS evaluates the impacts of the CID segment on pedestrian and bicycle circulation once the CID station is in operation (see DEIS Section 3.15.3.1 and 3.15.3.3), but does not provide a similar analysis of impacts during project construction. Importantly, the DEIS does not mention, much less evaluate, the potential impacts of the various road closures on the thousands of pedestrian trips trying to reach Lumen Field from east of 4th Avenue South. While pedestrian accessibility is important to PSA and FGI, between dedicated parking areas and the facility, pedestrian accessibility between existing transit/light rail stations is equally important for special events and achieving our TDM mandate from the City.

The PSA and FGI were unable to conduct any meaningful analysis of the potential impacts of the CID segment construction on pedestrian trips to and from Lumen Field. This is in part because the DEIS does not clearly disclose which sidewalks would be closed and when (see Appendix N.1A Transportation Technical Report, p. N.1E-1 explaining what road closures mean to adjoining sidewalks). With regard to the Weller Street pedestrian bridge, the DEIS says: "Access to the Weller Street Bridge would likely be closed, although a temporary pedestrian crossing of the construction area may be possible." DEIS, 3-135. As with the roadways, the DEIS identifies alternative pedestrian routes (South Jackson Street and South Main Street) but does not analyze the capacity of either route to accommodate typical pedestrian demand, much less demand during an event at Lumen Field or T-Mobile Park. To adequately disclose these impacts and identify appropriate mitigation to address and offset the impacts from the CID segment, Sound Transit must complete and provide these additional analyses.

As part of its mitigation for CID segment construction impacts, the PSA and FGI request that Sound Transit establish an improved east/west pedestrian connection and wayfinding between the CID, Stadium District, Pioneer Square, and the Waterfront. This is critical to ensuring continuing connectivity during the long construction period. Second, the PSA and FGI request that Sound Transit make improvements to 4th Avenue South of the CID station to improve pedestrian access from the south, rather than relying exclusively on pedestrian detour routes to the north (via S. Jackson and S. Main). Pedestrian safety and amenities are currently inadequate south of Dearborn Street on 4th Avenue South, yet we see a strong probability that Lumen Field and T-Mobile Park patrons will begin to try to use this route to avoid CID segment construction throughout the construction period (particularly during the closure of the SODO station anticipated with CID-1a).





5. Other Concerns with the DEIS Traffic Analysis

By dividing the analysis into discrete station-based segments, the DEIS also obscures the likely overlapping and compounding impacts that could arise if multiple segments/stations are under construction at the same time (another thing which is implied, but not clearly stated in the DEIS). As a step toward evaluating these combined impacts, the PSA and FGI asked TENW to create a figure depicting the combined total of anticipated road closures from Spokane Street through the CID. See Attachment G. The unevaluated and undisclosed potential consequence is that a single patron trying to get from the West Seattle Bridge to Lumen Field (or a regular commuter trying to get downtown) could encounter two or three sets of detours and construction-based delays while trying to get to an event. Adjacent and concurrent construction closures and detours have the potential to amplify disruptions to the transportation system by potentially removing alternative routes that may be used by drivers/transit to detour around another road closure. This is not evaluated as part of the WSBLE direct or cumulative impacts. Understanding the sequencing of construction closures occurring along the WSBLE alignment is critical to understanding the depth of the impacts to transportation operations in its vicinity.

Similarly, the DEIS segments consideration of the different types/modes of transportation impacts during construction – arterials/roadways, transit, non-motorized (pedestrians and bicycles), and freight into discrete and separate discussions. The DEIS does not appear ever to contend with the combined, multi-modal effects of all of these impacts although all will occur concurrently. For example, at the same time vehicular trips are diverting off of 4th Avenue and 5th Avenue to nearby roadways, those same detour routes will have to accommodate additional drivers whose access to transit has been reduced; Sound Transit's construction trucks (additional 20-35 trucks per hour); trucks and other large vehicles attempting to access Lumen Field for haul in/haul out; and the myriad pedestrians trying to navigate the maze of road and sidewalk closures. To provide an adequate transportation analysis that enables a "hard look" at the effects of the CID segment – and the WSBLE generally - these various overlapping and compounding impacts must be considered together. On top of that, cumulative impacts from other future reasonably foreseeable projects need to be added to the analysis.

6. Other Concerns with DEIS Impact Analysis

A. <u>The Analysis of Impacts to Environmental Justice Communities in the CID is</u> <u>Inadequate</u>

Appendix G to the DEIS contains Sound Transit's analysis of the potential impacts of the WSBLE on low-income and minority communities – i.e., communities with





Environmental Justice concerns². We appreciate Sound Transit's effort to evaluate these important impacts. As noted above, the PSA and FGI have a long-standing and important relationship with the CID and Pioneer Square neighborhoods, particularly the vulnerable populations within those communities.

The PSA and FGI acknowledge and appreciate the DEIS's more detailed analysis of impacts to low-income and minority populations in the CID given their relatively larger percentages (63% minority and 54% low-income³) compared to other neighborhoods in the WSBLE project area. We are concerned, however, that the analysis does not provide the public with enough *alternative specific* analysis to achieve a full understanding and weigh the potential impacts of each option. Much of the analysis is diluted to impacts "common to all segments" or all alternatives within a segment (see Appendix G, Table 5-4). Where a specific alternative within a segment is called out, the information about the impact is incomplete – e.g., identifying a likely business or road closure, but with *no analysis* of the *effect* of those impacts. (See discussion in Section III.1 above regarding lack of analysis of capacity of detour routes, or Section III.5 regarding lack of analysis of compounding impacts.)

Further, the DEIS mentions but does not adequately recognize or analyze the impacts that either the 4th Avenue or 5th Avenue alternatives will have on the small businesses in the CID. *See* DEIS Section 4.4.3. The businesses in the CID represent a historic and crucial part of our City. The neighborhood offers an important experience that the patrons of Lumen Field value during events and game days. Many of those businesses are also partners of the PSA and FGI, as we have worked with them for several years to bring them into the stadium as vendors.

It is important that Sound Transit expand the analysis completed to date to analyze and disclose how *each alternative alignment* will affect and threaten the livelihood and health of these businesses during and post-construction and consider alternatives that enable businesses to remain viable during both periods.

² As Sound Transit continues its environmental review process, the PSA and FGI encourage Sound Transit to integrate the analysis included in Section 4.3.4 (Social Resources, Community Facilities, and Neighborhoods) with its Environmental Justice analysis. As presented, these topics substantially overlap but are not wholly consistent and each contains information absent from the other that would be relevant to it.

³ The PSA and FGI took these percentages from Appendix G, Table 3-4. Although they cite the same source (2018 American Community Survey 5-year Estimates), they are notably *different* from the demographics reported in Chapter 4, Table 4.3.4-1. As part of finalizing the EIS, Sound Transit should take care to reconcile discrepancies between different sections of its EIS. We also noted other discrepancies regarding parking impacts.





B. Non-Traffic related Construction Impacts

The DEIS contains a very limited analysis of how construction impacts such as dust, noise, and vibration may affect operations and events at Lumen Field over the long construction period. See DEIS Chapter 4, particularly 4.3.6 (Air Quality) and 4.3.7 (Noise and Vibration). Additional analyses and direct engagement with the PSA and FGI are needed to better understand how construction activities could disrupt events at Lumen Field or increase our operating costs (dust cleaning, noise, vibration monitoring, etc.)

Of note, the DEIS anticipates that Sound Transit will obtain noise variances from the City of Seattle to complete work during nighttime hours. DEIS, p. 4.3.7-21. Such work could interfere with events at Lumen Field, requiring modifications to Sound Transit's construction schedule or other mitigation. The PSA and FGI request that Sound Transit coordinates with FGI to ensure that any construction based noise is limited during events (e.g., concerts) at Lumen Field to avoid interfering with those events.

Also, Sound Transit seems to have overlooked the possibility for vibration from Project construction to affect Lumen Field. The DEIS puts off detailed vibration analysis until final design (DEIS, p. 4.3.7-21). The PSA and FGI request that Sound Transit include Lumen Field among the sensitive receivers as it completes its noise and vibration impact analysis, and also evaluate how far dust or airborne debris may travel from the construction site to determine whether construction of the CID segment may affect Lumen Field, including activities in the Muckleshoot Plaza (between the stadium and the North Lot).

C. Impacts to Utilities

The PSA and FGI are also concerned that the DEIS does not identify the two fiber optic cables that cross 4th Avenue South and connect to Lumen Field. The DEIS does not evaluate the potential impacts of construction of the CID segment of this important communications infrastructure. To the extent that the CID segment construction will impact this cable, Sound Transit should be required to ensure continuous connectivity and to mitigate for any long-term impacts.

7. The Proposed Mitigation Measures are Not Yet Adequate.

The DEIS does not contain a single compendium of potential mitigation measures that Sound Transit is considering to address and offset the impacts of the WSBLE. Appendix I appears to be reserved for Sound Transit's Mitigation Plan, but it was not published with the DEIS. Instead, readers were left to sort through nearly 50 separate sections including the heading "Mitigation" and containing potential mitigation measures, many with multiple crossreferences. This choice not to publish all of the potential mitigation measures together in one





place made it difficult for the PSA and FGI – and certainly other readers – to understand and evaluate the adequacy of Sound Transit's proposed mitigation.

Considering our significant concerns with the potential transportation impacts from the CID segment construction, we focused on DEIS Section 3.19.7.⁴ With regard to potential mitigation for traffic impacts during construction, the DEIS provides that "Sound Transit would develop a Construction Access and Traffic Management Plan for the Ballard Link Extension Project. The plan would be developed as the Project advances and include the overarching goals and objectives for the project's construction and the approach to partner agency coordination." DEIS, p. 3-151. The DEIS goes on to list "components likely to be addressed in detail," including "maintaining business access; minimizing construction disruption during large events; providing alternate routes for freight, general traffic, and non-motorized access; parking management; and maintaining transit operations (i.e., bus, streetcar, and light rail). DEIS, p. 3-151. Sound Transit does not identify Lumen Field or T-Mobile Park as collaborators in preparing this plan. The PSA and FGI request that Sound Transit include them in the team working to develop this plan.

In addition, the PSA and FGI request that Sound Transit work directly with us to develop mitigation measures to address and offset the negative impacts of the Ballard Link Extension construction, and particularly the CID segment, on Lumen Field and the surrounding CID and Pioneer Square neighborhoods. We have developed the attached *preliminary* list of mitigation measures that the PSA and FGI would like Sound Transit to implement. See Attachment I. Some of these measures overlap with those set forth in the various mitigation discussions sprinkled throughout the DEIS. In most instances, additional measures and additional details are needed to ensure that the mitigation measures in fact address the impacts from Sound Transit's construction impacts.

III. Conclusion

Thank you for the effort that Sound Transit and its team put into preparing the DEIS. Having prepared an EIS for another large public infrastructure project (Lumen Field), the PSA and FGI understand and appreciate the significant effort and duty involved in creating a comprehensive analysis for a large public project. While Sound Transit has done a considerable amount of analysis regarding the WSBLE to date, substantial additional analysis is needed regarding the multiple alternatives (not just a preferred alternative) before the public and decision-makers can understand and fairly weigh the impacts of the different route alternatives. Until this analysis is completed and disclosed, Sound Transit cannot reasonably select a preferred alternative for the CID segment or identify adequate mitigation for the impacts of its project.

⁴ Notably, the mitigation summary in Section 3.19.7 does not include all of the mitigation measures included in Section 4.3.3 regarding the economic impacts of the WSBLE project, although some appear to overlap.





As set forth above, the PSA and FGI expressly request that Sound Transit and the FTA undertake the following steps as part of selecting a preferred alternative and completing its environmental review:

- Complete additional traffic analysis including:
 - Analyze and disclose the capacity of the existing streets and sidewalks in the CID, Stadium District, Pioneer Square, and SODO to accommodate the traffic/pedestrians assigned to them as part of construction-based detours (Section III.1)
 - Analyze and disclose the impacts of construction traffic on various event scenarios at Lumen Field and T-Mobile Park (Section III.1.A)
- Identify alternative parking to enable Lumen Field to continue to meet its MUP required parking minimums. This applies both to parking temporarily removed or restricted during construction, as well as parking permanently removed during operations (Section III.2)
- Analyze and disclose the effects of the WSBLE construction on the efficacy of Lumen Field's TMP and propose mitigation to address any impacts (Section III.2)
- Supplement the transportation analysis to consider the combined and compounding effects of overlapping construction of multiple stations (Section III.5)
- Supplement the transportation analysis to consider the combined effects of the CID segment construction on vehicular traffic, pedestrian movement, large vehicle movement (haul in and out for Lumen Field, T-Mobile Park, and the WSBLE construction) (Section III.5)
- Supplement Appendix G to provide more analysis regarding the specific impacts of each alternative on businesses in the CID, and propose appropriate mitigation to fully address and offset impacts to low income and minority communities from each alternative (Section III.6.A)
- Analyze and disclose the effects of CID segment construction in terms of dust, noise, and vibration on Lumen Filed (section III.6.B)
- Evaluate the impact of the CID segment construction on the fiber optic cables running from Lumen Field east over 4th Avenue (Section III.6.C)
- Begin meetings with the PSA and FGI to review our proposed mitigation measures (Appendix I) and develop final mitigation measures following completion of the additional environmental review requested above (Section III.7)
- Identify ways that Sound Transit can contribute to the vibrancy of the communities around the CID segment that exceed the minimum SEPA and NEPA requirements

We look forward to working with Sound Transit to complete the needed analysis and identify the requisite suite of mitigation measures. We will reach out to you in the coming weeks





to schedule a meeting to discuss the content of this letter and potential mitigation. Thank you for your efforts.

Sincerely,

Zach Hensley

Zach Hensley Vice President/General Mgr. First & Goal Inc.

toment-Fred Mendoza

Chair WA State Public Stadium Authority














ATTACHMENT H



CenturyLink Field DRAFT

Transportation Management Program

Plan Year 2019

Prepared for City of Seattle and Parking and Access Review Committee

Developed by Washington State Public Stadium Authority First & Goal, Inc. Seattle Seahawks Sounders FC

> Prepared by Joe Walden & Ron Little Parking & Traffic, CLF

> > 1

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EXECUTIVE SUMMARY

Construction of CenturyLink Field in Seattle required preparation of an Environmental Impact Statement (EIS). The transportation and parking analysis presented in the EIS concluded that impacts could be effectively mitigated through the implementation of a Transportation Management Program (TMP) rather than a set of physical improvements. This programmatic approach recognized the temporal and variable character of the major events hosted by CenturyLink Field.

This report presents the TMP for CenturyLink Field for 2019, CenturyLink Field's eighteenth year of operation. This TMP is like those used in past years. We are always mindful to keep the TMP updated to show current conditions. The TMP's programs and practices continue to be adjusted dynamically to respond to the actual event day conditions observed in recent years, as well as to major infrastructure construction projects that are in planning and/or under construction in 2019 and beyond. While this TMP focuses on Seahawks Football games, elements of this TMP have been scaled to serve Sounders FC and other major events at CenturyLink Field.

The TMP builds on prior experience with the parking and access plans prepared for the Kingdome, the Ballpark TMP, and previous years' experience implementing the TMP for CenturyLink Field.

The TMP is structured around four groups of programs including the following:

- Event management and public education;
- Parking and traffic demand reduction;
- Management of resultant vehicle and pedestrian demands; and
- Implementation and monitoring.

Automobile mode split continues to drop with the initiation of Link Light Rail service in mid-2009, the continuing success of Sounder Commuter Rail trains on weekends, Rideshare Apps to/from sporting events, and regular Sound Transit Express and King County Metro transit routes. The increased availability of a menu of non-automobile options is an ever more important component of special event transportation effectiveness.

Factors challenging the resiliency of the TMP include:

- Access route interruptions due to major road construction;
- Significant reduction in the nearby off-site parking supply due to road construction and private property redevelopment; and
- Continued decrease in on-street parking supply and availability due to increased enforcement.

While these are challenges for all modes of travel, automobile users are affected the most which may, from a traffic congestion perspective, be contributing to the shift toward non-auto modes of travel - a central objective for the TMP.

Monitoring Process and Success

To obtain an accurate picture of how well the TMP goals are being met, an attendee survey has been and will continue to be conducted during the regular season. The survey gathers information from attendees to determine the number of vehicles per 1,000 attendees arriving at the stadium during the two hours prior to kick-off at a selected game. The study area boundary is found in Appendix A.

As in past years, CenturyLink Field has performed a survey during a Seahawks home football game. The following summarizes the goals and results of goal compliance associated with this survey for 2018.

Weekend Evening Football Game December 23, 2018		
48%		
y 2.40 persons per car		
Goal Compliance		e
Goal	Observed	Exceeded
277	274	Yes
277	200	Yes
19,762	13.421	Yes
	Weekend Eve D 2. Goal 277 277 19.762	Weekend Evening Football C December 23, 20 67,257 48% 2.40 persons per Goal Compliance Goal Observed 277 274 277 200 19.762 13.421

2018 Survey Findings

2. Based on calculation procedure used to set the indexed goal in the EIS & MUP

Cars parked for a 58,000-person Seahawks football game at the former Kingdome 3

The statistically based index was found to be 274 cars per 1,000 attendees, which is, lower than the TMP goal of 277 cars per 1,000 persons.

When using the EIS based calculation of this index using survey results for auto mode split (48%) and average car occupancy (2.40 persons per car), the calculated index of 200 cars per 1,000 persons suggests the TMP is achieving its goal very effectively.

Supporting this finding is the fact that this game was calculated to generate 13,421 cars. This is less than the number of parked cars contained in the EIS for a 58,000-person weeknight game at the former Kingdome (19,762 cars).

INTRODUCTION

The City of Seattle Department of Construction and Inspection required the develop of a TMP as a condition of their approval for occupancy of CenturyLink Field. This report presents the annual summary of goal compliance, and the programs that will be undertaken during the 2019 year to continue the effectiveness of this program.

Purpose and Scope

The purpose of the TMP is to minimize the impact of vehicle and pedestrian circulation and parking and the secondary effects of circulation and parking management controls on the neighborhoods and streets surrounding CenturyLink Field.

The purpose of this report is to summarize the TMP review and approval process; report on goal compliance; outline the programs and policies that will guide the TMP during the 2019 year; and summarize key roles and responsibilities associated with implementation of this TMP. This report includes measures to inform and educate event attendees as well as the general public to the opportunities and potential conflicts with CenturyLink Field events so that they can make appropriate travel and parking choices to:

- Minimize conflicts;
- Coordinate policies, programs and operations associated with non-automobile modes of transportation;
- Manage the residual vehicle and pedestrian traffic flows and parking; and
- Coordinate implementation and regularly monitor operations to improve upon specific event day
 operations and plan for known changed conditions that affect operational strategies.

The TMP is intended to apply to both weekend day and weekday evening conditions. Major weekday daytime events are expected to be very infrequent and would require a special TMP if anticipated attendance levels warranted special traffic management measures. While the emphasis for specific operations for weekday evening events may vary slightly from weekend events, the core program elements will remain the same regardless of time of day or day of week; such as, residents and business owners with access passes are able to enter otherwise restricted areas like those along Occidental Avenue.

Like mitigation of any environmental impact, it is essential that the mitigation measure(s) is balanced against the project objectives. In this case, measures to shift travel mode and control vehicle and pedestrian traffic movements must be balanced with creating a positive attendee experience. The purpose of CenturyLink Field is to provide a venue for sports and entertainment events that complement the City and region. Accordingly, the TMP must balance traffic management and control with a positive guest perception of the event. The TMP attempts to find that balance by advising attendees of their options including a reasonable expectation of the opportunities and constraints and then delivering on that expectation to minimize surprises and uncertainty. Similarly, this same balance is a goal in working with businesses, customers, tenants and residents in the surrounding neighborhoods.

The program elements in the TMP respond to a weekday evening Seahawks game. Weekend football games have about the same level of traffic control with less of an emphasis on blending evening commuter traffic patterns with inbound event traffic patterns. Unlike weekend events, on weekday evening's inbound premium park-and-ride and Sounder rail services are not available.

Sounders FC employ a scaled down traffic control plan reflecting attendee demographic that is more strongly oriented to regular service transit, carpooling, walking and cycling.

Other time specific events follow the same general pattern as a Seahawk plan because in the immediate vicinity of CenturyLink Field the traffic patterns are essentially the same and thus require similar traffic control. For large events, the duration of activity is simply longer than for smaller events.

Review and Approval Process

As in prior years, the TMP has been reviewed by the Parking and Access Review Committee (PARC) at their regularly scheduled meetings and through regular meetings with individuals and groups representing the Pioneer Square, International District, and SODO/North Duwamish neighborhoods, public agency staff, and organizations central to the effective management of measures to mitigate the impacts of CenturyLink Field. Refinement of the operation plan is occurring concurrently with a review of the TMP by the PARC so plans can be in place for CenturyLink Field's 2019 season.

Variable Conditions and Need for Flexibility

As noted in the Executive Summary, CenturyLink Field was approved with the condition of establishing a TMP to mitigate potential adverse impacts related to vehicle and pedestrian circulation. This programmatic approach was selected because major events occur intermittently and generally do not conflict with traditional peak traffic conditions. The programmatic approach also accommodates CenturyLink Field event-day travel conditions which vary depending on crowd size and event character. Such a program has the ability to respond to these changes dynamically, under short notice without major capital improvements.

Major transportation improvements will affect access to and from the site. Some of the road and utility projects in the immediate site vicinity include:

- Seattle Streetcar
- 1st Ave improvements
- SR 99 i.e. Viaduct Demo
- Bus will relocate out of SR99 Tunnel in March

A listing of current and upcoming construction related projects is maintained by SDOT and can be found at http://www.seattle.gov/transportation/constructionlookahead.htm#sodo.

Other major projects affecting regional transportation patterns include WSDOT North Access project, residual work in the Mercer corridor, which also causes some people to filter south to access I-5, Northbound I-5 closures to fix expansion joints. CenturyLink Field staff works with key transportation

agencies through the City of Seattle Department of Transportation (SDOT) to anticipate and revise traffic control plans to minimize event day traffic impacts.

Accordingly, the success of any event-oriented TMP revolves around its ability to be responsive to change. This flexibility is necessary to respond to variations in tenant needs, attendee travel patterns and attitudes. The TMP anticipates the need to modify traffic controls, such as police posting, street use controls and signalization, in response to major development of transportation infrastructure improvements that will force a shift in travel routes and capacities in the surrounding area.

TMP GOALS, ACHIEVEMENT AND HISTORY

The TMP strives to meet both qualitative goals that address the functional needs of the facility and the surrounding neighborhood and numerical goals that are a discrete measure of TMP performance

Functional Goals of the TMP

It is the objective of this TMP to minimize automobile traffic congestion by illustrating the benefits of nonmotorized and mass transit alternatives and by encouraging carpooling. Of those attendees arriving by car, the objective is to keep traffic flowing by reducing conflicts with pedestrians and decreasing undue circulation and turning conflicts by providing drivers who are searching for parking with predictable parking options.

Major road improvements, such as SR 519 Phase 2, have permitted the Seattle Police Department (SPD) to empty the CenturyLink Field Garage 15 to 20 minutes faster due to the improvement's elimination of the at-grade rail conflicts. In contrast, major construction projects like the downtown tunnel, the sea wall, and viaduct have limited circulation and capacity in the immediate area.

The CenturyLink Field TMP is targeted to primarily address professional football. Similar traffic management strategies are scaled for typical Sounders FC games (about 30 fewer traffic officers for example). As other tenants and events are identified, this TMP is modified to address the anticipated attendance levels and the conditions that exist at the times and days when these other events occur. Special TMPs are developed and reviewed with PARC when they differ substantially from the TMP designed for a typical Seahawks game.

Year 2019 Single Event TMP Numerical Goals

The DPD, in the T-Mobile Park street vacation decision, determined that it was important to have measurable criteria to monitor the effectiveness of the Ballpark TMP. A similar approach was used for establishing a goal for CenturyLink Field. This approach recognized that private automobile parking and traffic demand have the single largest effect on area traffic congestion. Therefore, an index was developed for private automobile traffic and parking to measure the reduction in cars traveling to and from events. This index was defined in terms of cars per 1,000 persons attending an event. The index is

fundamentally affected by the two most critical factors in reducing automobile demand including: (1) mode split (use of transit and other non-automobile modes of travel) and (2) average vehicle occupancy for the cars that do travel to the event. The various techniques and strategies used to influence these two factors are discussed as part of the specific program elements.

This index-based approach is particularly well suited for a facility like CenturyLink Field that will host different types of events with differing crowd sizes, event timing, and demographic characteristics. For example, a soccer crowd is typically characterized by higher vehicle occupancy with a proportionally higher reliance on regular service transit and bicycles as compared with a Seahawks football game. The numerical goals were graduated to provide time for the TMP to mature during the early years of stadium operations and gave the facility operator and tenant time to make refinements in management strategies as necessary. For single CenturyLink Field events (when there are no overlapping major time specific events in T-Mobile Park), the goals are summarized in Table 1 and are now fixed at 277 cars per 1,000 attendees and 307 cars per 1,000 attendees for weekend and weeknight events respectively.

Event Type and Timing	1998-1999 *	2002	2003	2004 and beyond
Weekend	340 Cars per 1,000	319 Cars per 1,000	298 Cars per 1,000	277 Cars per 1,000
CenturyLink	attendees	attendees	attendees	attendees
Weeknight	370 Cars per 1,000	349 Cars per 1,000	328 Cars per 1,000	307 Cars per 1,000 attendees
CenturyLink Field	attendees	attendees	attendees	

Table	1-	Single	Event	Performance	Goals
1 0 0 10		Onique	- VOIIC	I GIIQIIIIIIIIIOC	- ouio

Previous experience at the Kingdome

2019 Dual Event TMP Goals

As part of the planning for T-Mobile Park and CenturyLink Field, the potential for overlapping major events at CenturyLink Field and T-Mobile Park were raised as a concern.

Time-specific dual events are those that occur either simultaneously or which there are less than three hours between the projected end time of one event and the scheduled start time of the next event. Within this period, the majority of event attendees are generally anticipated to arrive and depart at about these same times.

While it is in the best interest of CenturyLink Field and T-Mobile Park to avoid such conflicts, DPD felt it was necessary to establish goals in the event of such a dual event condition. The Seattle Mariners, the operators and major tenant of T-Mobile Park, and First & Goal Inc. (FGI), the organization responsible for managing the construction and operation of CenturyLink Field agreed on a protocol for scheduling events that was embodied in an agreement commonly referred to as the Dual Event Agreement. Essentially this agreement eliminates the possibility of two time-specific events with a combined attendance over 58,000 persons occurring within three hours of each other without a special TMP.

8



CenturyLink Field and T-Mobile Park management coordinate calendars and have identified several potential overlapping schedules including:

Date	CenturyLink Event	Safeco Event
Sat. April 13th	Sounders Game / 1:00PM	Mariners Game / 6:10PM
Sun, April 28th	Sounders Game / 12:30PM	Mariners Game / 1:10PM
Sun July 21st	Sounders Game / 6:30PM	Mariners Game / 1:10PM
Satl August 10th	Sounders Game / 1:00PM	Mariners Game / 6:10PM
Sat. Sept. 15th	Sounders Game / 12:30PM	Mariners Game / 1:10PM

Management of both facilities have and will continue to work together to develop special plans for these conditions.

While such a circumstance is highly unlikely, the goals that apply to this potential for dual event goals are summarized in Table 2 below. Note that these goals do not apply to simultaneous events with a combined attendance of less than 58,000 persons.

General Dual Event Goal		
General Dual Event Goal for dual events w/concurrent attendance up to 65,000	310 vehicles per 1,000 atter	dees
Time Specific Dual Events	2002	For the Life of the Project
Dual Time-specific Events w/concurrent attendance of 58,500 to 65,000 on a weekday evening, or 65,000 to 75,000 on a weekend	No more than 300 vehicles per 1,000 attendees at both venues	No more than 280 vehicles per 1,000 attendees at both venues
Dual Time-specific Events w/concurrent attendance of 65,000 to 85,000 on a weekday evening, or 75,000 to 95,000 on a weekend	No more than 270 vehicles per 1,000 Attendees at both venues	No more than 240 vehicles per 1,000 attendees at both venues
Dual Time-specific Events w/concurrent attendance of between 85,000and 95,000 on a weekday evening, or greater than 95,000 on a weekend	No more than 250 vehicles per 1,000 attendees at both venues	No more than 220 vehicles per 1,000 attendees at both venues
Dual Time-specific Events w/concurrent Attendance of greater than 95,000 on a weekday	No more than 250 vehicles per 1,000	No more than 200 vehicles per 1,000 attendees at both venues

Table 2 - Dual Event TMP Goals

Monitoring Process and Success

Consistent with the conditions of approval for CenturyLink Field, FGI management supervised an evaluation of the performance of the CenturyLink Field TMP by a local transportation consultant (Transportation Solutions, Inc.). Specific evaluation was prepared for the December 23rd, 2018 weekend night football game. Based on this evaluation, the TMP was found to be effective in reducing and managing impacts in the immediate vicinity of CenturyLink Field. A summary of performance measures and the event day performance is summarized in the Table 3.

In addition to using, the index calculated using the survey data; other factors like average vehicle occupancy, and non-auto mode choice were added to illustrate and interpret goal compliance. Table 3 shows that impacts were managed substantially below the impacts estimated in the CenturyLink Field EIS. The computed index, and number of cars generated were in line with or better than prior years of football under Kingdome operations, which was the basis for setting the TMP goals and thus is believed

to be a more representative indicator of TMP performance. Furthermore, mode split is substantially reduced from previous Kingdome and CenturyLink Field operations.

The statistically based index was found to be 274 cars per 1,000 attendees, which is the fifth time this statistical index has been lower than the TMP goal of 277 cars per 1,000 persons. When using the EIS based index, the survey results for auto mode split (48%) and average car occupancy (2.40 persons per car), the calculated index of 200 cars per 1,000 persons further suggests the TMP is achieving its goal very effectively.

Supporting this finding is the fact that this game was calculated to generate 13,421 cars. This is less than the number of parked cars contained in the EIS for a 58,000-person weeknight game at the former Kingdome (19,937 cars)

	Weekend Day Football December 23,2018			
Date				
Attendance	67,257			
Surveyed Auto Mode Split		48%		
Surveyed Average Automobile Occupancy	Automobile Occupancy 2.40 persons per car Goal Compliance		ersons per car	
			0	
	Goal	Observed	Exceeded	
Statistically Calculated Index (cars per 1000 attendees) i	277	274	Yes	
Directly (EIS) Calculated Index (cars per 1000 attendees) 2	277	200	Yes	
Cons Dankad.	10 762	13 421	Voc	

able 3- 2010 Survey and Goal Achieventent Results	Table	3-	2018	Survey	and	Goal	Achievement	Results
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Based on survey calculation procedure

Based on calculation procedure used to set the indexed goal in the ELS & MUP 5.

6. Cars parked for a 58,000-person Seahawks football game at the former Kingdome

Historical Performance Summary

The TMP builds on prior experience with the parking and access plans prepared for the Kingdome, the Ballpark TMP, and previous years' experience implementing the TMP for CenturyLink Field. Examples of effective programs in each of these TMPs include the dispersed parking strategy that was central to the success of the Kingdome TMP; the resident/business permit system developed through the Ballpark TMP; and the continuous event day monitoring and updating process employed during the Seahawks use of Husky Stadium and the previous seasons at CenturyLink Field.

The mode split comparison in Table 4 compares initial projections and recent survey findings. The estimated mode split for the inaugural year of operation of the TMP and the survey results from a Sunday football game in 2003 shows initial expectations and results. Based on 2018 survey, the TMP was shown to reduce the automobile mode split by 19% from the 2003 season and by 32% below original estimates based on Kingdome experience. Kingdome operations are used for comparison because they were the basis for setting TMP goals.

	lac)(e 4 - Mode	Spin Company	son			
	EIS Estimate		2003 Performance, with TMP		2018 Performance, with TMP		
	Mode Split	plit Vehicles Mode Split Vehicles		Mode Split	Vehicles		
Automobile	78%	19,762	75% 16,625		48%	13,421	
Non-Auto					52%		
Sound Transit			7%		7.6	7.6%	
Sounder Train			N/A		5.8%		
Link Light Rail			N/A		8.4%		
Charter Bus			1%		0.5%		
Ferry/Charter Boat			4%		4.6%		
Pedestrian/Bicycle			3%		7.7%		
Taxi/Limo			3%		0.6%		
Uber/Lvft			N/A		10.6%		
Other	-		79	6	1.3	%	
Total			100%		100%		

Table 4 - Mode Split Comparison

*Includes Drop-offs

MEASURES TO BE UTILIZED DURING THE 2018 SEASON

TMP Structure

The individual TMP elements have been incorporated and organized in the TMP in a sequence of strategic program groups, which include the following:

- Event Management and Public Education. This program group concentrates on event and facility management techniques to eliminate and/or reduce transportation demand. Most important, public and attendee information programs have been developed to share information regarding ways to make effective transportation mode and routing choices and take advantage of opportunities that complement the event experience and minimize impact on the surrounding community.
- Traffic and Parking Demand Reduction. This program group encourages non-automobile modes of travel such as Sound Transit and King County Metro transit, Rideshare apps (TNC), rail (Sounder Train, Link Light Rail and Amtrak), waterborne, and non-motorized modes. CenturyLink Field transportation management staff remains open to exploring and promoting creative efforts to encourage increased average vehicle occupancy, (AVO) although encouraging AVO increases has proven to be less productive than advocating a broad menu of non-automobile alternatives.
- Management of Resultant Vehicle and Pedestrian Demand. This program group focuses on parking, traffic and pedestrian flow management, and physical improvement options to direct and control the traffic flows and enhance safety that will exist. These measures are intended to manage local traffic congestion on event days by efficiently directing drivers to available transportation and parking facilities, minimizing pedestrian conflicts while maximizing safety.

 Implementation and Monitoring. This program group targets the management, monitoring, and refinement of the effectiveness of the TMP to respond to planned and unplanned event characteristic and transportation system modifications.

Event Management and Public Education

This program group concentrates on event and facility management techniques to efficiently plan, coordinate, and manage event transportation programs. Public and attendee programs are intended to share information regarding options to avoid conflicts and take advantage of opportunities that complement the event experience while minimizing impact on the surrounding community.

Event Traffic Management. CenturyLink Field coordinates event-day parking and transportation needs under the direction of International Parking Management (IPM). This work ranges from coordinating event schedules to identifying supplemental access control, event support staff to interface with on-street traffic control, distribute and collect temporary signage, bollards and barricades, and assist with parking assignments in reserved parking areas

Internally, FGI's Traffic Manager, Seahawks, Sounders FC, other major event producers, and corresponding event broadcasters. They work together to develop and distribute the publicly available traffic and parking information included in the Event Transportation Guide, Web Page, and information kiosks located in CenturyLink Field. The IPM staff and the General Manager also support CenturyLink Field's participation on PARC and coordinate event schedules with T-Mobile Park, City of Seattle, King County Metro, Port of Seattle and other affected public and private transportation operators. In addition, the Traffic Manager regularly attends the SODO meetings to stay abreast of changes related to construction and road closures.

Event Scheduling and Management. The Dual Events Agreement provides a protocol for scheduling events to minimize conflicts among large special events scheduled in this facility and at T-Mobile Park. This protocol strives to eliminate major simultaneous time-specific events and events scheduled on the same day; effort is made to time such events so that the end of one event and the start of the other are separated by no less than three hours. The specifics of this protocol are defined in the Revised Dual Events Agreement in Appendix B. Periodic updates of the current event schedule are provided to PARC members and interested individuals to be sure PARC members are aware of the size and timing of upcoming major events.

CenturyLink Field also advises prospective tenants who plan major time-specific events that conflict with typical weekday activities (either rush hour traffic or freight circulation) of the inconveniences the proposed event timing could create for their patrons as well as for the surrounding neighborhoods. Alternative timing and scheduling are suggested so such conflicts can be minimized. As in the past, management of CenturyLink Field and T-Mobile Park will exchange schedules in an effort to minimize scheduling during the overlap of their respective seasons in the surrounding area and downtown.

Pre- and/or Post-Event Activities. Pre- and/or post-event promotions and activities are offered to event patrons, particularly for higher attendance events. These events are hosted in the Event Center and/or in CenturyLink Field plaza areas. Pre- and post-event activities help to spread traffic volumes over longer arrival and departure time periods. This temporal distribution enhances traffic and transit operations and reduces neighborhood disruption, particularly before events when traffic patterns are not as controlled as compared to traffic patterns following an event. Following events these activities generally occur at private businesses and restaurants.

Event Transportation Guide. Event Transportation Guides are posted for the upcoming season on the Seahawks, Sounders FC, and CenturyLink Field web pages. The guide promotes alternatives to driving to an event and identifies preferred parking areas for those persons who do drive to and from the area. The guide is distributed to all season ticket holders, is available to individual game ticket purchasers and is posted online. The Event Transportation Guide is modified when there are changes to the transportation system or services that support access or parking to CenturyLink Field. Web addresses for the Sounders FC and Seahawks Event Transportation Guides are:

- www.seahawks.com/gameday/getting-to-centurylink-field/
- www.soundersfc.com/transit

E-mail and Social Media. The Seahawks and Sounders FC have a very high proportion of their attendees who are season ticket holders. As such, they maintain a direct linkage with this season ticket holder base and advise them of team related information including major changes to transportation and parking conditions. They are also using Twitter, Facebook and other social media platforms to advise attendees and the general public of traffic and parking related changes.

Traffic Advisory Services. Traffic reports and other advisory information are broadcast so event attendees, community residents, and businesses are aware of transportation options and constraints. The service is coupled with other advertising and promotional activities through broadcasting contracts. In addition, the broadcasters provide transportation information in advance of events as part of special appearances and promotional broadcasts. The pre- and post- game program announcers actively promote early arrival; use of transit, trains, and ferries; and carpool parking opportunities. Real time information is broadcasted by announcers using WSDOT and SDOT camera and traffic advisory service information, so attendees can be advised of options to avoid congestion points along primary routes to and from CenturyLink Field.

CenturyLink Field Call Center. The general CenturyLink phone number serves event guests as well as neighbors to call in advance of the event for information or to report a problem on an event day. CenturyLink Field staff manages this service in coordination with the Seahawks and Sounders FC. If the receptionist or staff cannot respond to the question, the caller is referred to the CenturyLink Field Traffic Manager, the appropriate tenant, a CenturyLink Field staff person, or the direct service provider (parking, King County Metro, Sounder train, Link Light Rail, Amtrak, Washington State Ferries, etc.). The system's effectiveness increased when it was coordinated with the SPD non-emergency phone number and SPD

staff were provided with specific game day instructions for communicating concerns or problems directly to field commanders responsible for traffic and parking control.

Construction Coordination. The performance of the access and egress routing plan will need to be gauged as the year progresses, due to the potential constraints necessitated by major infrastructure construction projects in the area. At this time, construction planning is dynamic, meaning that dates of construction and construction phasing that could affect local streets are changing over time. CenturyLink Field is a partner with other affected parties in sharing routing, scheduling and traffic control information as it becomes available. CenturyLink Field continues to work with the City of Seattle Department of Transportation (SDOT), a group involved in planning and construction of major street and highway improvements in the vicinity of CenturyLink Field. CenturyLink Field management attends meetings on a regular basis and makes adjustments to transportation information shared with event attendees and specific strategies utilized with traffic control personnel and transit operators.

Reduce Traffic and Parking Demand

This program group encourages non-automobile modes of travel such as regularly scheduled transit and supplemental King County Metro service, Rideshare Apps (TNC), Sounder Rail, Link Light Rail, waterborne, and non-motorized modes. Service levels, routes, and availability are regularly changing because of individual operator needs and priorities. These changes are communicated to event patrons and plans are adjusted as warranted.

Supplemental Transit Service. King County Metro provides supplemental transit service with added buses on selected routes as demands warrant.

CenturyLink Field management coordinates with SDOT and King County Metro to identify potential high demand routes. This is particularly important for weeknight Sounders FC matches and Monday and Thursday Night Football games. CenturyLink Field will continue to work with SPD to help reduce some of the observed post event delays after Sounders FC matches northbound on 4th Avenue to give buses a priority through this intersection where busses are currently experiencing significant delays.

Light Rail Service. FGI, the Seahawks and the Sounders FC continue to coordinate with Sound Transit and the Link Light Rail service to publicize and maximize the use of this option for passenger service from outside the downtown core area. This system provides even more options and frequent service to help attendees avoid making vehicle trips to the stadium vicinity. Attendees' use of several stations to board Light Rail to access CenturyLink Field also provides opportunities for local businesses to benefit from the added foot traffic. Link Light Rail parking facilities for the system are predominantly located at the Tukwila Station. Arrangement for additional parking at SeaTac Airport was recently established. Also including leveraging University of Washington parking lot to service patrons coming from the North end of town and utilizing the Light Rail to get to a game.

With all the transit demand oriented to 5th Avenue South and the International District bus/rail station, the Weller Street overcrossing will continue to be the primary means of crossing to and from CenturyLink Field.

Sounder Service. FGI, the Seahawks, and the Sounders FC continue to work with Sound Transit to establish a special rail program serving Everett and Tacoma. This service is similar to the special trains that operated in previous years and will only be available for weekend games due to the limited availability of track time. These trains are scheduled to arrive at and depart from King Street Station at times that coincides with game times. FGI has worked with Sound Transit and added a new gate near the North Lot Parking Lot to service our southern residents. This has helped to decrease the congestion at the Union Station and Weller Street Bridge for arriving Guests.

Amtrak Cascade Train Service. In addition to this special train service, Amtrak schedules 5 to 7 trains for the north and the south each day. Several of these trips are scheduled so they arrive prior to and following weekend Seahawks and Sounders FC events. Weeknight games typically require an overnight stay.

Tour operators for Seahawks football games market special charter rail service. As in the previous seasons, this service typically starts from Portland, arrives approximately one hour before kick-off, and leaves within one hour after a game end. This special train serves 200 - 300 persons.

Facilitate Ferry Use. Ferry service is promoted as part of the CenturyLink Field Transportation Guide. Washington State Ferry passenger and automobile service operates frequently on weekends and weekday evenings, so users have considerable flexibility for traveling to and from CenturyLink Field events. Most passengers are expected to walk between the ferry terminal and CenturyLink Field, which is a seven-block distance. Pedi-cabs also facilitate the CenturyLink Field to ferry connection.

Bicycle Racks. Bicycle racks are provided at CenturyLink Field near the northwest ticket gates. Extra racks, particularly for Sounders FC matches, are placed in this location on a temporary basis. Racks are provided in front of CenturyLink Field where there is high visibility and where they are regularly monitored by facility security to minimize the potential for theft and vandalism. Bicycle racks are also provided south of the stadium in the SR 519 plaza although their use is limited because they are not convenient to stadium entrance locations. Although proximity to an exclusive trail system like the Burke-Gilman Trail does not exist, routes along Alaskan Way, Dearborn Street, East Marginal Way South and a variety of local streets provide excellent connections to CenturyLink Field. CenturyLink Field and T-Mobile Park are working with bicycle groups to explore expanded options for bicycle storage.

Provide Priority Taxi/Limousine/Accessible Access/Loading Areas. A special access drive and loading area for taxis, limousines, accessible and shuttle buses is located at the intersection of Railroad Way and Occidental Avenue next to the west side of CenturyLink Field. Access to and from this loading area is available via Railroad Way between Occidental Avenue and First Avenue. This secured access complements the traffic control necessary to ensure Occidental Avenue is available to adjacent residents and businesses. Access is available for taxis, limousines, small shuttle vans, Metro's Access Vans, and patrons dropping off disabled passengers. With the exception of Occidental Avenue pass holders, private automobiles will not be permitted to access any other portion of Occidental Avenue. After events, taxis and limousines can be staged along Railroad Way and Occidental Avenue to pick up their passengers on

a "first come, first serve" basis. Additional disabled parking and loading is located in the north parking lot. Private limousine operators also stage in loading zones one to three blocks from CenturyLink Field in an effort to avoid the concentrated pedestrian and vehicle congestion after events immediately adjacent to the building.

Rideshare Applications. In last the several years the introduction to rideshare applications such as Uber, Lyft, Curb, Flywheel, etc. on the smart phone has made coming to events at CenturyLink Field much easier. Event patrons can schedule pickup and drop off with a few simple keystrokes on their phone. CenturyLink Field is working with all TNC's and the city to establish pickup and drop off locations that do not adversely affect the traffic patterns.

Manage Resultant Vehicle and Pedestrian Demand

This program group focuses on parking, traffic and pedestrian flow management, and physical improvement options to direct and control the traffic flows and enhance safety that will exist. The availability of free or lower cost parking near CenturyLink Field on weekends and weekday evenings incentivizes many patrons to drive to events at CenturyLink Field, even with the most aggressive measures in place to encourage event patrons to use alternate travel modes. Therefore, the TMP includes two program subgroups directed to: (1) facilitate patron access to minimize the delay and maximize accessibility and (2) provide neighborhoods immediately adjacent to CenturyLink Field with tools to discourage the encroachment of event vehicles into their communities. These two program subgroups provide the combination of incentives and disincentives that reduce event day traffic and parking impacts. The central principles underlying this set of programs are:

- Parking resources located, managed and promoted by CenturyLink Field to distribute and dilute concentrations of traffic flow.
- Maximize pre-sold parking to minimize the number of event patrons that would search for onsite parking and off-site parking in adjacent neighborhoods.
- Designate preferred routes into and out of CenturyLink Field that minimize conflicts with pedestrian flows.
- Maximize the use of underutilized traffic corridors.

Access and Egress Routing Plan. Figures 1, 2, and 3 illustrate the proposed ingress and egress plans. Key to these plans is the presale of the parking discussed above. Fully pre-sold parking (for many events) allow CenturyLink Field management to advise attendees that parking at CenturyLink Field is not available so drivers without prepaid parking should not try to access streets leading to adjacent garages. Attendees can be directed to park in the Central Business District (CBD) and off-street in the SODO neighborhood. This approach reduces unnecessary circulation, which minimizes pedestrian conflicts and errant vehicle turning movements. The access plan is narratively described with interactive maps to illustrate transportation options in the Transportation Guide.

The egress plan includes two underlying principles. First, the on-site and covenant parking facilities have exit routes that correspond to specific routes or on-ramps. The special event traffic control plan

summarized below is set up to guide cars in a predefined pattern. Second, egress routes are designed to get most drivers two or more blocks away from CenturyLink Field before they have a choice to turn.

This directed flow accomplishes two objectives: (1) minimize turns that conflict with the heavy pedestrian flows near CenturyLink Field and (2) minimize delay by reducing opposing vehicle conflicts so attendees can exit the area more quickly. This approach was implemented during the initial year of operation. While there were initial complaints with this structured exiting system, attendees soon learned that a well-managed exit plan, even when it seemed out of direction, was often faster than letting drivers choose among several uncontrolled routes. Over the past decade, drivers found the route that fit their needs best and switched parking lots or exit lanes to best accommodate their requirements. This more structured type of exit plan also reduces the time traffic circulates through adjacent neighborhoods.

CenturyLink Field parking management has added parking lots (beyond the covenant parking lot supply) to its inventory, including additional lots in the SODO area south of CenturyLink Field. These parking resources and the continuation of the recent successful parking/access management practices help to ensure effective use of available parking capacity and reduce the traffic congestion particularly following a game.

Revise Guide-SignIng System FGI and the Seahawks continue to work with the Seattle Mariners, SDOT, and WSDOT to modify, when necessary, signage on the arterial street network that is fundamentally consistent for CenturyLink Field and T-Mobile Park access.







Update the Event Traffic Control Plan. CenturyLink Field management will work with SPD and SDOT to update the pre- and post-event traffic control posts and instructions. A nominal set of police posts for both pre- and post-game conditions is shown on Figure 4. This set of police posts will continue to be dynamic to accommodate the travel patterns that emerge as attendees adjust to the changes in parking conditions and as construction of planned transportation improvements creates restrictions and opportunities to access routes or road capacities. The SPD, SDOT and CenturyLink Field staffs will use knowledge gained through recent years and T-Mobile Park operations in particular to prepare for traffic controls that will respond to the immediate conditions presented by the construction projects on any given event date. This will include considering police posts that may be customized to respond to the character of the event-which is advisable for events such as high-attendance concerts. Attention will continue to be given to conflicts with freight transport (train and truck operations) particularly near the Port of Seattle and Burlington Northern terminals. This traffic control plan will likely be changed slightly from week to week, but any major changes are brought before PARC for review and refinement.

Written instructions are developed for each police post. Specific issues like permitting residential access pass holders to controlled areas or facilitating freight movements on days when shipping activity coincides with events is included in these instructions.

A temporary signing program managed by SDOT complements this plan. These signs are delivered in advance of each major event and are picked up after each major event. IPM is responsible for distributing, setting up, taking down, and picking up these signs. Signs are removed from the street by 10:00 AM the following morning.

Residential/Business Access Pass Program. As noted earlier, CenturyLink Field plans the continued use of the access pass system developed by T-Mobile Park to ensure that residents and business operators can be assured access during events where traffic control restricts access for the general public. This will apply to those living and working along Occidental Avenue adjacent to CenturyLink Field and will also extend to other areas where traffic controls restrict CenturyLink Field patrons or general public access. For example, residents and businesses along Occidental are granted access to Occidental Avenue only from King Street. This program is administered by T-Mobile Park management with CenturyLink Field input to ensure consistency for residents, business owners, and police officers affected by this system.

Pedestrian Corridor Enhancements. FGI continues to collaborate with Sound Transit, King County, City of Seattle and the PSA regarding the routine maintenance and security of the Weller Street Pedestrian Bridge. As noted above, the concentration of pedestrian traffic crossing the Weller Street Bridge warrants monitoring and potential staffing to ensure elderly and disabled attendees are given priority use of the elevator and are not overrun by the surge of attendees walking between the Chinatown International District and CenturyLink Field. FGI installed a new gate permitting direct access between CenturyLink Field and a new train platform to take off pressure for pedestrian traffic.

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Pre-Sell Off-street Parking for Event Guests. A central element of this TMP is the sale of parking to season ticket holders with the parking location being related to their desired post-event destination. Experience with T-Mobile Park access and egress has reinforced the benefits of such a program. There is a greater opportunity to take advantage of shared parking opportunities with the T-Mobile Park Garage, the Union Station Garage, King County Metro Garage and other parking areas managed by CenturyLink Field management.

For major time-specific events the Seahawks and Sounders FC offer full-season parking passes in one of several parking facilities to those patrons who choose not to take advantage of transit, rail and ferry options. Sales staff explains that traffic routes from CenturyLink Field have been designed to reduce exit times. Each major garage or parking area managed by CenturyLink Field management is planned to serve a selected set of destinations or freeway connections as discussed earlier. These are illustrated on Figure 3. Manual traffic control plans are adjusted to reflect these patterns and changes in parking reservoir s. On-site parking is marketed on non-event days to serve downtown employee parking needs. The benefit of these parking stalls in the periphery of downtown is to reduce downtown parking demand and congestion in the core downtown streets while maintaining direct access to the limited access freeway network. This also helps to discourage parking in adjacent neighborhoods.

IPM continues to manage CenturyLink Field parking operations. In addition to the covenant parking at CenturyLink Field Garage, CenturyLink Field North Lot, T-Mobile Park, and Union Station garage (5,100 parking stalls), IPM manages parking that is available at Home Plate Center 1 Garage (150 stalls), 1531 Utah Garage (280), Hawk Tower (350), Stadium Place Garage (125), Home Plate Center 2 Garage (400), King County Metro Garage (400 during the week and up to 600 on the weekends for major events over 20,000), and Starbucks Corporate Garage (500 Seahawks weekends only). They also manage between 15 and 20 surface parking lots within a 1/2-mile radius of CenturyLink Field that total another 500+ parking stalls. These smaller lots can change from year-to-year depending on the underlying owners' business operations and requirements. When these properties are within the IPM Management System, their staff work to coordinate parking, so event attendees can locate parking opportunities as close as possible to CenturyLink Field with the intent of minimizing on-street circulation that creates artificial congestion in the vicinity of CenturyLink Field. To minimize congestion and unnecessary circulation searching for parking, transportation guide messaging should advise driver s without parking passes to find parking away from CenturyLink Field and the Ballpark.

Employee Parking Program. CenturyLink Field, Seahawks, and Sounders FC will continue their off-site employee-parking program at a cost that is equal to or less than metered parking. This parking continues to be provided in off-street parking lots or garages that do not compete with neighborhood customer use on weekends or weekday evenings. Employees park in the Safeco and King County Metro Garage and on occasion at other lots upon availability as needed.

Implementation and Monitoring

This program group targets the management, monitoring, and refinement of the TMP to respond to regular and dynamic changes that occur as the facility and transportation system evolves.

Participate in the Parking and Access Review Committee (PARC). CenturyLink Field management continues to actively work with PARC and neighborhood groups and individuals to refine area traffic and parking plans. This review organization has and will continue to serve as the policy and management advisory group for the CenturyLink Field TMP and is informed regarding major operational changes to CenturyLink Field parking and access plans. The PARC is the group responsible for reviewing the transportation survey and goal compliance. Any significant modifications to goals or TMP programs necessary to achieve goal compliance are reviewed by PARC, which will make their recommendations to the city. In addition, CenturyLink Field Management will provide periodic informal reports at quarterly PARC meetings, as necessary.

Traffic Operations Group. As discussed above, an event-to-event traffic operations group is maintained. The purpose of this group is to work with the operational details to enhance the efficiency of programs and policy directives approved by PARC. This technical and operations group includes the CenturyLink Field management and corresponding operations level staff in SDOT, King County-Metro, Seattle Police Department, Washington State Patrol, and Seattle Fire Department. This group is the implementation arm of PARC for CenturyLink Field events and members of this group could represent their respective agencies on the PARC. During the inaugural season, this group met following each event. As operational plans have solidified such meetings are only called to address isolated problems involving affected implementation agency representatives. Meetings are held on an as needed basis throughout the year.

Establish a Periodic TMP Review and Update. As noted in the introduction, it is imperative for this TMP to be a living set of programs that recognize and address changing conditions created by the construction of parking and transportation access improvements as well as the changes that emerge as CenturyLink Field guests adjust to the CenturyLink Field transportation plan. As noted above, the TMP goals are formally reviewed once each season.

ROLES AND RESPONSIBILITIES

The TMP has been developed through the collaborative efforts of several organizations that have key responsibility for the effective operation of CenturyLink Field. These organizations include the Public Stadium Authority (PSA), the owner of CenturyLink Field; First and Goal Inc. (FGI) the CenturyLink Field operator; the Seattle Seahawks and the Seattle Sounders FC, the principal tenants at CenturyLink Field. FGI, Seahawks, Sounders FC or other major CenturyLink Field tenants will serve as the event day management team responsible for implementing the programs in the TMP.

The PARC was established when T-Mobile Park was constructed and was reconstituted from the less formal organization established for the Kingdome, the Stadium Parking and Access Review Committee. The PARC was identified as the central review and advisory group representing affected public agencies and potentially impacted neighborhood organizations and groups. The PARC was created as a means for representatives from businesses and residences near the stadium to have input into the traffic management planning and operations for CenturyLink Field. After considering the results of the attendee survey from the previous year, along with other information, PARC has been chartered with making informed suggestions to revise future TMPs based on the changing needs of the community and based on the successes and failures of currently implemented measures. The PARC is made up of

representatives from the three adjacent neighborhoods (Pioneer Square, International District, and North Duwamish), public sector partners (Public Facilities District, City of Seattle, King County Metro, Port of Seattle, Public Stadium Authority, and WSDOT), and private sector participants including the Mariners and FGI. The SDOT leads PARC.

CONCLUSION

The PSA, FGI, the Seahawks, and Sounders FC are confident that the consistent implementation of the above outlined programs will effectively meet or exceed the principles and goals associated with CenturyLink Field events. This confidence is based on the strong working relationships established between the operating entities and the individuals and groups who represent adjacent community interests. Further, CenturyLink Field and its transportation partners have improved operations as evidenced by the steady decline in the TMP Goal Index as attendees opt for non-automobile travel options and increased carpooling.

Furthermore, FGI, the Seattle Seahawks and the Seattle Sounders FC have an effective working relationship with City of Seattle, King County, Port of Seattle and State agency staff responsible for implementing the operations associated with an event TMP for CenturyLink Field events. This relationship has resulted in the ability to make important operational changes to the TM P on a week-by- week basis to quickly address isolated problems. It's expected that these relationships will continue to facilitate TMP implementation during the 2019 season at CenturyLink Field.



APPENDIX B

RESTATED AGREEMENT ON EVENT SCHEDULING PRINCIPLES

THIS RESTATED AGREEMENT (the "Agreement") dated the day of February, 2009, is made by and among THE BASEBALL CLUB OF SEATILE, LP., a Washington limited partnership (the "Mariners"), and FIRST & GOAL INC., a Washington corporation ("FGI"}, (collectively, the "Parties"), and supersedes the previous Restated Agreement on Event Scheduling Principles between the Parties dated December 21, 2004.

SECTION I. BACKGROUND

This document establishes a protocol for event scheduling to minimize impacts on the affected neighborhoods and to maximize shared parking. In general, event scheduling should allow baseball, football and soccer events to occur so that simultaneous time-specific events are scheduled in the Ballpark and Stadium only consistent with this Agreement. Events may be scheduled that are simultaneous with, sequential to, or overlap another event, provided that the scheduling protocol of this Agreement is followed, adequate code-required parking is available for such events and other permit conditions are met.

SECTION II. DEFINITIONS

1. "Ballpark" shall mean the baseball park located at First Avenue South and Edgar Martinez Drive South in Seattle, Washington, currently known as T-Mobile Park, and which is owned by the Washington State Major League Baseball Stadium Public Facilities District ("PFD").

2. "Dual Events" shall mean Time-specific Events occurring on the same day in the Ballpark and Stadium that are either (a) simultaneous events; (b) overlapping events; or (c) sequential events with less than three hours separating the projected end time of the first event and the scheduled start time of the next event.

3. "CenturyLink Field Event Center" shall mean the exhibition facility which is located south of the Stadium along Royal Brougham Way, and which is owned by the Washington State Public Stadium Authority ("PSA").

4. "FGI" shall mean First & Goal Inc., a sibling company of Football Northwest LLC, the owner of the Seattle Seahawks ("Seahawks"), a National Football League ("NFL") team; a sibling company of Seattle Soccer LLC, the owner of the Seattle Sounders FC ("Sounders"), a Major League Soccer ("MLS") team; and the party which has operations responsibility for the Stadium and CenturyLink Field Event Center.

5. "Holiday" shall mean those days recognized by the City of Seattle as legal holidays.

6. "Major Consumer Show" shall mean a consumer show reasonably expected to attract an average daily attendance of more than 10,000.

7. "Mariners" shall mean The Baseball Club of Seattle, L.P., the owner of the Seattle Mariners Baseball Club, a Major League Baseball ("MLB") team, and the party having operations responsibility for the Ballpark. 8. "Simultaneous Events" shall mean the definition required by the City of Seattle to allow shared parking between the Ballpark and Stadium/Exhibition Center facility.

9. "Stadium" shall mean the football/soccer stadium currently known as Qwest Field, located on the former site of the Kingdome, and which is owned by the PSA.

10. "Time- specific Events" shall mean events occurring at the Ballpark or Stadium which, like baseball or football games, have a specific scheduled start time and/or projected end time such that a significant majority of attendees is generally anticipated to enter and/or leave the event *en masse*.
11. "Year" shall mean each twelve-month period during the Term commencing on March 16 and

11. "Year" shall mean each twelve-month period during the Term commencing on March 16 and continuing through the following March 15.

SECTION III. EVENT SCHEDULING PRINCIPLES

1. There shall be no Dual Events when the anticipated combined attendance is expected to be either (a) in excess of 58,000 if on a Monday through Friday, excluding Holidays; or (b) in excess of 70,000 if on a Saturday, Sunday or Holiday.

2. For Dual Events below these anticipated attendance levels, as a general rule, professional sports events or other comparably sized Time-specific Events will not be scheduled at the Ballpark and the Stadium on the same date unless there is at least three (3) hours between the anticipated end time of the first such time-specific event and the start time of the second. The parties will use their best efforts to avoid conflicts that violate this general rule. However, as outlined below, limited exceptions for overlapping events will be permitted as long as the other scheduling and mitigation requirements set forth in this Agreement are met. "Overlapping events" are those Time-specific Events where the start time of the second of the two events is at least thirty (30) minutes after the start time of the first event, and at least thirty (30) minutes prior to the anticipated end time of the first event.

3. Not more than twice each year, overlapping events may be scheduled on a non-Holiday weeknight (Monday through Friday), as long as the reasonably anticipated combined attendance of the two events does not exceed 58,000.

4. Not more than twice each year, overlapping events may be scheduled on a Saturday, Sunday or Holiday, as long as the reasonably anticipated combined attendance of the two events does not exceed 70,000.

5. Whenever overlapping events occur, the parties agree to:

a. work together to stagger the start times to minimize the possible conflict between fans arriving/departing one event with fans arriving/departing the other event;

b. work together with each other and with Seattle police to ensure overall coordination of traffic management; and

c. share all traffic management charges and post-event neighborhood cleanup costs, including the cost of police, signs, barricades etc., based on each party's share of the total combined attendance consistent with Section IV below.

6. The Parties recognize that the MLB schedule, which currently includes 81 regular season home dates and which is scheduled around multi-game series, multi-game home stands and road trips, and team travel that must be coordinated with the travel and schedules of other teams, must be established prior to scheduling other events in the Ballpark or Stadium during the baseball season.

7. The Mariners will solicit FGI's input prior to development of the MLB schedule for any Year, and will give reasonable consideration to incorporating such input in its comments to MLB. The Mariners shall provide FGI with a schedule of baseball games for the following season, together with an outline of the period of time in which post-season games may occur, as soon as a reasonably reliable draft schedule is issued by MLB. The Mariners will provide FGI with the "final" MLB schedule for the following

While three (3) hours between events is the minimum requirement under the general rule, the parties acknowledge that more time between events is preferable for traffic and parking management. Before scheduling events with less than four (4) hours between them, the parties will make good faith efforts to consider and discuss with one another possible scheduling changes to provide four hours between events, or to determine if overlapping events may be preferable to sequential events. If one party elects to change its scheduled start time to increase the window between events beyond three hours, the second party agrees not to change its scheduled start time to narrow that window. Season by no later than December 15th of each Year. It is recognized that the "final" MLB schedule is the schedule issued by MLB on which game dates are not expected to change, but on which start times may still be subject to change. The Mariners will promptly advise FGI of any changes or updates to the schedule.

8. As the MLB schedule is developed, the Mariners shall advise MLB that their schedule must, over the course of the regular season, leave approximately 50% of the weekend dates (Friday evening, Saturday, Sunday), reasonably spread over the baseball season, available for professional football and/or soccer. For the four (4) weeks of NFL exhibition games, weeks 19 through 22 of the MLB regular season, and weeks 1 through 4 of the of NFL re gular season, weeks 23 through 26 of the MLB regular season, each team will have two weekends for scheduling home games. Should the NFL at any time revert back to starting the NFL regular season on the first Sunday in September, or MLB change to conclude its regular season schedule on the last Sunday in September, the following bracketed language, which appeared in the Parties' 1998 Agreement on Event Scheduling Principles and is deleted in this Restated Agreement, will be reinstated in place of the foregoing sentence, unless both Parties agree to a modification:

[In August and September, the baseball schedule will assure that weekend dates remain clear for the scheduling of Seahawks games on at least two weekends in each month. If September contains an odd number of Sundays, the Mariners will request that MLB provide the Seahawks with the additional Sunday half the time that this occurs. In no event shall the Mariners regular season baseball schedule provide for the playing of Mariners games on more than two consecutive Sundays during the months of August and September without the prior agreement of the Seahawks and the NFL.]

9. The Mariners shall have priority over the Seahawks, the Sounders and other potential Stadium events, in scheduling MLB's post-season league playoffs, the league championships series and the World Series, provided that in no event shall the Mariners play baseball home games on more than three consecutive Sundays during the baseball post-season. If the MLB schedule for post-season play makes it impossible to meet this requirement, the Mariners and the affected team (Seahawks or Sounders) shall immediately engage MLB and the NFL or MLS in an effort to resolve the conflict.

10. FGI shall have the right in advance of each Year, after receiving the "final" MLB schedule for that Year and before any other events are firmly booked in the Ballpark, to schedule (i) the Seahawks and Sounders home games to be played in the Stadium that Year; (ii) up to 33 Major Consumer Show days between November 1 and March 15 of that Year; and (iii) up to 21 additional event days in the Stadium and/or Exhibition Center during that Year. The following requirements and procedures shall apply to the scheduling of these dates:

10.1 FGI shall have 30 business days following receipt of the "final" MLB schedule (the "hold period") to schedule these events. Such scheduling may be done either by confirming an event booking or by placing a hold on the day. FGI will notify the Mariners of confirmed bookings as they become confirmed, and of hold dates by the end of the hold period. Event days not scheduled within this 30-business-day period are available to either party/facility on a first-come basis, consistent with the standard scheduling procedures addressed below. "Business days" shall not include weekend, holidays, Friday after Thanksgiving, or the week between Christmas and New Year's Day.

10.2. The Mariners shall wait until the end of the hold period before scheduling any events in the Ballpark, other than MLB games, for the coming Year. After the 30-day hold period, if the Mariners wish to book an event in the Ballpark on an FGI hold date, and FGI does not have a confirmed booking for that date, FGI shall have 5 business days to confirm a booking. If a booking is not confirmed by FGI within 5 business days, the Mariners then have 5 business days to confirm their booking for that date. If the Mariners do not confirm a booking in the Ballpark on that date within 5 business days, the hold date reverts to FGI. If the Mariners confirm a booking in the Ballpark within 5 business days, FGI shall be entitled to select another hold date from among those dates then available. Hold dates will only be "challenged" under this procedure on a one-event-at-a-time basis; i.e., if the Mariners have one potential event causing them to challenge one or more FGI hold dates, they will not challenge another hold date until the first challenge has been resolved.

10.3. If either the NFL or MLS schedule is unavailable to FGI within the hold period, FGI shall place hold dates for these events based on its best estimate of the game schedule. Any events scheduled in the Ballpark (other than the MLB schedule established consistent with the guidelines set forth above) will be subject to confirmation of the NFL and MLS schedules.

11. A combined event calendar for the Stadium, Event Center and Ballpark shall be prepared each year and revised continuously to show all confirmed bookings and hold dates. The Parties will jointly develop operational procedures for booking events after the hold period, coordinating schedules and maximizing the potential use of the public facilities while limiting dual events consistent with this Agreement. Such operational procedures will include a procedure for placing hold dates and challenging hold dates reasonably consistent with the procedure described above. The Parties commit to fostering open communication between their respective event coordinators to facilitate this coordination.

12. The Parties shall each designate an event coordinator who shall be responsible to minimize conflicts in schedules. The Parties shall cooperate with each other in reasonably promoting events in each other's venue and in the surrounding neighborhoods through the use of their respective message signs and other mutually agreed upon methods.

13. The Parties acknowledge the importance of attracting "premier" events of national or international significance, including events such as the Olympics, NCAA bowl or tournament games, World Cup games, the Super bowl, the MLB All-Star Game, national political conventions, and events of similar magnitude. The Mariners and FGI will request that their respective professional leagues accommodate the scheduling of premier events, when the schedule for such events is known prior to the time that the professional sports schedules are developed. The Parties will utilize their reasonable best efforts toward resolving scheduling conflicts involving premiere events, recognizing the respective professional sport leagues will have to approve any advance booking of dates that may affect their schedules.

14. MLB games, NFL games, MLS games, and any additional events (including premier events) that are scheduled by either party consistent with the hold period and operational procedures described above, and therefore do not conflict with a prior scheduled event in the other facility, shall be considered "priority events." Such priority events shall have priority to the amount of code-required parking necessary for the event over any other simultaneous events in the other facility.

15. Simultaneous events may be scheduled, consistent with the procedures outlined in paragraphs 2-5 above for professional sports events and other comparably-sized Time-specific Events, provided the venue proposing the non-priority event (the event scheduled outside the procedures described above) is able to provide any additional code-required parking beyond what would otherwise be required if there was not a simultaneous event and meet all other City permit requirements.

16. Subject to the scheduling principles described above, a minimum of 1,500 parking spaces in the Exhibition Center parking facility and a minimum of 400 parking spaces in the North Lot of the Stadium site shall be made available for all MLB games or other priority events scheduled in the Ballpark; the remaining parking spaces on the Stadium site shall remain available for Stadium or Exhibition Center simultaneous scheduled events or other Stadium/Exhibition Center uses. The total number of parking spaces required to be available in the Exhibition Center parking facility and North Lot may be reduced if, when combined with the number of parking spaces available on the Ballpark site, such spaces are not required to meet code-required parking for the Ballpark event.

17. Subject to the scheduling principles described above, a minimum of 2,000 parking spaces in the Ballpark parking facility shall be made available for all NFL or MLS games or other priority events scheduled in the Stadium; the remaining parking spaces on the Ballpark site shall be made available for Ballpark simultaneous scheduled events or other Ballpark uses. If the Mariners and/or PFD do not expand the amount of parking available on the Ballpark site from the approximately 1,680 spaces originally planned to the 2,000 spaces currently planned and approved by the City of Seattle, this commitment of 2,000 parking spaces will be decreased accordingly. No liability shall accrue to the Mariners as a result of any reduction consistent with the terms of the covenant implementing this commitment. The total number of parking spaces required to be available on the Ballpark parking facility may be reduced if, when combined with the number of parking spaces available on the Stadium and Exhibition Center site, such spaces are not required to meet code-required parking for the Stadium and/or Exhibition Center event.

SECTION IV. SPECIAL TMPS

1. If for whatever reason a special Transportation Management Plan (TMP) is required, the Parties agree to pool their parking supply and whatever operational resources each utilize for its own single event in order to maximize resources for dual or simultaneous events. Any additional costs for special TMPs shall be shared by the Parties based on each party's share of the attendance.

2. For all events held in the Ballpark, Stadium and Exhibition Center, the Parties shall work to coordinate traffic and parking issues to the greatest extent possible by developing an operating plan to minimize impacts to the Pioneer Square, International District and SODO/Duwamish neighborhoods.

3. Both Parties agree to cooperatively arrange for traffic control personnel.

4. The Parties agree to promote the use of public transit services to the Stadium and Ballpark area to provide efficient service for events and to minimize traffic congestion.

SECTION V. ACCESS AND STAGING

The Parties will use best efforts to make access lanes and staging areas on one another's respective properties available for the other party's use so long as such use does not interfere with any scheduled event or use of the property and complies with the fire code and other City regulations.

SECTION VI. PARKING

1. Each party agrees to enter into an agreement, including parking covenants, to legally establish accessory parking for that venue's events, subject to the Dual Event principles.

2. Each party agrees to cooperate fully in providing High Occupancy Vehicle (HOV) incentives, presold parking opportunities and other parking arrangements to maximize vehicle occupancy for events.

3. Both Parties also agree to cooperate in identifying and arranging off-site parking facilities available for events beyond any code-required parking.

SECTION VII. MEDIATION/ ARBITRATION

Mediation shall be utilized to resolve any disagreements between the Parties. If mediation does not achieve resolution, the Parties shall submit any remaining issues that involve the interpretation or application of this Agreement to final and binding arbitration before a single arbitrator pursuant to the Commercial Arbitration Rules of the American Arbitration Association.
SECTION VIII. TERM

The Term of this Agreement shall commence on the date first stated above, and shall expire on March 15, 2012. Either party may terminate this Agreement by providing written notice of such termination to the other party, with copies to the PFD and PSA, no later than September 15 preceding the March 15, 2012 expiration date. If neither party gives such timely written notice of termination, then this Agreement shall automatically renew for successive additional one-year terms. If either party gives timely written notice of termination, then the Parties shall as soon as practicable thereafter meet and begin good faith discussions with the objective of reaching a successor agreement by the expiration date that satisfies all applicable parking code and permit requirements

EXECUTED as of the date first above written.

THE BASEBALL CLUB OF SEATTLE, LP.

a Washington limited partnership

By Baseball of Seattle, Inc. a Washington corporation Managing General Partner

Ву_____

Bart Waldman

Executive Vice President,

Legal and Governmental Affairs

FIRST & GOAL INC.

a Washington corporation

By_____

Ed Goines

Vice President/General Counsel

Attachment I PSA and FGI: Preliminary List of Mitigation Measures

- Transportation, Parking and Pedestrian Access Related Mitigation:
 - Maintain access, acceptable to FGI, at all times to: (1) all on-site parking (North Lot and Lumen Field Garage) to accommodate passenger vehicles, buses, semiand flat-bed trucks and all other vehicles used to load in/out and stage events; and (2) covenant parking (T-Mobile Park Garage, Union Station Garage, and Metro Garage) during construction.
 - Maintain pedestrian access to the Weller Street Bridge. If, however, bridge access cannot be maintained, a temporary pedestrian crossing of the construction area should be provided proximate (within less than one quarter mile) to the Union Station Garage.
 - Establish an east/west ADA accessible pedestrian route from Chinatown/International District to the Stadium and Event Center with an enhanced wayfinding program.
 - Permanently replace the 200 lost City Code required covenant parking stalls at Union Station Garage at a location acceptable to the PSA/FGI.
 - In perpetuity, if either 4th Avenue South alternative is constructed, reimburse FGI for additional traffic control to allow southbound left turn ingress into northern Union Station Garage per required Transportation Management Plan access route during stadium events.
 - 5 Fund added costs for event management during construction including:
 - Additional traffic control costs associated with established detour routes for vehicular traffic, bikes, and pedestrians,
 - Additional signage/wayfinding (static and LED boards) for construction detour routes for vehicular traffic, bikes, and pedestrian, and
 - Costs associated with providing safety/security along pedestrian detour routes, including from any off-site parking designated for event patrons and facility part-time event personnel.
 - Develop and fund traffic management strategies designed to effectively deter daily and event-related vehicular traffic from detouring through adjacent neighborhoods of Pioneer Square and Chinatown/International District along non-established detour routes.
 - Provide supplemental/alternative transit or shuttle services during all stadium events to encourage use of public transportation, discourage SOVs, and mitigate the closure of the stadium station.
 - In collaboration with FGI, sports teams and other event promoters, develop and implement a public education campaign (including media advisories and use of social media) informing the public of road closures and detour routes, alternative parking locations, bike routes, and event transit/shuttle options.
 - Fund added costs incurred by FGI to implement the Stadium Transportation Management Plan resulting from the construction impacts on event traffic, parking, and pedestrian access.

- In collaboration with FGI, sports teams, and consumer show and other major event promoters, develop and implement incentive programs to reduce eventrelated traffic and parking demand such as reduced fare and other programs.
- Develop a construction transportation management plan including hours of construction, access routes for construction workers, haul routes, etc. As part of the plan, provide off-site parking for Project construction workers to avoid additional area traffic congestion and impacts on parking available for neighborhood businesses, residents and event patrons.
- Make available during events, reserved construction worker parking for event patrons.
- In conjunction with FGI and City officials, develop an emergency access plan to the Stadium and Event Center.
- Other Construction Related Mitigation:
 - Conduct regularly scheduled biweekly construction coordination meetings with FGI and the construction project manager and make corresponding adjustments to the construction schedule/activities to minimize construction impacts on Stadium and Event Center events.
 - Monitor air quality for construction dust and reimburse FGI for any related increased cleaning costs.
 - Install vibration monitors and take corrective action in case of vibration that could damage the facility.
 - Replace/relocate fiber optic running from the stadium to 505 5th Avenue South and ATT conduit running under 4th Avenue as required to maintain functionality and connectivity.
 - Restrict and/or limit construction activities to avoid adverse impacts, such as construction vibration and noise, on all stadium and north plaza events including during event load-in/out.
- Public/Community Outreach:
 - Designate a community liaison whose responsibilities would include (but not be limited to) providing information to and communicating with members of the surrounding neighborhoods throughout Project construction.
 - Conduct regular community meetings (no less than once per quarter and more frequently as needed based on degree of construction activity and impacts) before and during construction to address impacts of construction on surrounding communities.
 - Establish a 24-hour construction hotline and Project website with construction updates and ability for public to submit comments.
 - Provide Project construction information in multiple languages.

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

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Sound Transit Projects

Details	Communication
#504837	
#004001	April 7, 2022
Data Basiavadu	WSBLE Draft Environmental Impact Statements c/o Lauren Swift
Date Recieveu.	Sound Transit
4/7/2022	41 South Jackson Street
	Seattle, WA 98104
Created by:	
Cecelia Gunn	West Seattle and Ballard Link Extensions Draft Environmental Impact Statement Executive Summary
Audience	Address: 425 Pike Street
General Public	Parcel no: 1975700240
	Descrite Origin
Reach:	Dear Ms. Switt:
Participation:	Washington Federal Bank doa Wal-d Bank is the owner of the above-referenced property (the "Property Owner"), objects to the proposed West Seattle and
Engagement:	Ballard Link Extensions Draft Environmental Impact Statement Executive Summary (the DEIS"). The Property Owner is concerned about Sound Transits
Source	demonstrated inability to exercise fiscal responsibility and the negative permanent impacts to the central business district due to the proposed protracted
Source.	snutdowns.
Assigned	The DEIS does not adequately describe the impacts both temporary and permanent to our property or the neighborhood in which it is located. For example, the
division:	The DLD does not adequately describe the impacts, both temporary and permanent, to due property of the registromody in which it's located, if of example, the above property is tarreated as the site for a transit station. It renders the comorate headquirters for an over 100-year-old. Seattle-head husiness useless. The
Outreach	above property is largeled as the site for a units station, interfaces and outpot at needpot at need to be not year only. Ceate-based business detects in the context to condemn outpot not provide the avertage of the site of a context to condemn outpot and the site of th
Category:	to control importing and relocate our business operations, as well as our tenants, will be exomitant and are not practical. Our story is one of dozen's o
Project Phase	be negatively inipacted by this reckless proposal.
Planning	The proposed routing corridor janores other existing corridors such as the waterfront or Third Avenue which will be easier and more cost effective to complete.
	The DEIS is not unlike a similar proposal rejected by voters just a few years ago; however, ensuing development makes such an endeavor more unrealistic than
Project	ever. Also, it is not considering the impacts of defunding law enforcement, the pandemic and the acceptance of the digital workplace on the central business
Segment:	district. The central business district is years away from a recovery and an ensuing shutdown would significantly delay its recovery. This could very quickly
Environmental	become a white elephant adding to urban blight and vagrancy
phase:	······································
Draft EIS	Furthermore, the following inadequacies of the DEIS have been identified by property owners and the Downtown Seattle Association:
	The DEIS is based on an inadequate set of construction plans, which makes it impossible characterize future impacts. ST3 plans are at less than 5%
	completion, which means th elements of the project are not yet defined, such as:
	a. Horizontal and vertical control for each alignment alter
	b. Actual construction methodology, so that nois
	estimated.
	c. Scope of above-grade construction limits.
	d. Actual street closure locations and durations.
	e. Pressure limitations to be imposed on future construction above tunnel locations, which dictates the nature and feasibility of future construction.
	f. Scope and design of above-grade improvements associated with station entrance locations.
	g. The duration and sequencing of construction activities, to determine the cumulative impacts of construction work on the urban environment.
	• The ST3 tunnel will impose limitations on the size, location, and weight of ruture structures above, which will immit urban redevelopment opportunities through
	Seattle's Central Business District. The DEIS does not characterize these limitations or evaluate the impact of loss of housing and jobs in the core market to be
	served by S13.
	• Above-grade construction associated with the ST3 tunnel will necessarily involve identified station locations as well as presently undentified other construction
	staging areas. The DEIS does not evaluate the impact of these significant surface activities on the Center City urban environment and the businesses, residents,
	and economy of the area. The DEIS does not attempt to characterize these impacts or to identify mitigation for them.
	• All or portions of the S13 project may be proposed as design-build construction projects. As such, most decisions regarding construction means and methods
	are intended to be deterred to the general contractor, long after the completion of SEPA review. Atmough the design-build process may offer innancial advantages
	to Sound Transit, it cannot be used to doage the obligation for full review of environmental impacts under SEPA. Many impacts, including important hoise and
	vibration impacts, will vary based on method of construction. The DEIS 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.
	• I ne uming, duration and location of street closures associated with the project is speculative. Further, this information is not even included in the DEIS, which is
	a major shortcoming, 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
	uurauon may have significant adverse impacts. Loss of access to parking garages and loading facilities could significantly impede or force the shutdown of
	building infrastructures for a period of time. And closures will have the effect of re-routing traffic to other rights-of-way, further congesting those locations. The
	s does not attempt to evaluate these impacts, nor can they be evaluated until a more definitive street closure plan can be developed in the future.
	• The very preliminary plans for future station entrance location included in Appendix J to the DEIS show that Sound Transit intends to commandeer large chunks
	or city blocks throughout Downtown Seattle for oversized station entrance structures. Some of these sites occupy a full quarter block or more. The DEIS fails to
	evaluate several issues associated with this overdevelopment of station entrances, including:
	a. The loss of existing businesses, jobs and nousing resulting from such station entrances;
	b. The impact to the urban environment resulting from the substitution of sterile station entrances for thriving urban businesses and retail uses.
	c. The loss of nundreds of jobs and housing units that would otherwise have been developed on the sites of the station entrances.
	• There are significant urban design issues associated with proposed station entrance locations. The DEIS assumes that fare box hav will occur at the street
	level where it will have the greatest impact on displacement of existing and future urban uses. The DEIS should explore more opportunities and options for fare-
	have, more it mining to greatest impact on displacement of existing and ratios urban uses. The belie should explore more opportunities and options for lace
	• The same concern applies to the above grade portions of the railway. In locations where the guideway is above grade and not located in the right of way, it will
	whe out future development opportunities including attractive opportunities for TOD development. For example, the preferred route elignment in South laterbase
	whe out dure development opportunities, including attractive opportunities for TOD development. For example, the preferred route alignment in South Interbay would take out several future development sites on Elliott Avenue, all of which could one day include jobs and housing to support the party ST2 station. The
	would take out several future development sites on Linou Avenue, all of which could one day include jobs and housing to support the hearby S13 station. The
	Interpretence and internative in this location would preserve these future TOD sites. The DEIS should evaluate the impacts of displacement of new TOD development
	anemauves may result from the angliment and station location alternatives.
	- we understand that sound mansh has developed, and is continuing to develop, more specific construction plans and guidelines. This work would help to
	As a relevant even study the DEIS should avaluate the development and impacts associated with the construction of the 2nd Avanue has tweed in the 4000-
	- As a relevant case study, the DETS should evaluate the development and impacts associated with the construction of the 3rd Avenue bus tunnel in the 1980s.

Details	Communication
	Although that project was a cut-and-cover operation, the large-scale above-grade impacts of the ST3 project (due to street closures, multiple station entrance
	locations and other construction staging operations) are not likely to be less than the 3rd Avenue experience. The 1980s construction project for the 3rd Avenue
	tunnel created undeniable blight conditions on that corridor, many of which persist decades later. The DEIS should include a strong set of mitigation measures to
	ensure that the effort to enhance transit service to Downtown Seattle does not initiate a new generation of urban blight.
	• The ST3 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, should require tuture SEPA review when facts and information are available to
	allow that review to occur adequately.
	minimation clicate to evaluation of environmental impacts is not available, therefore, a phased review is appropriate, as noted above, refining nume phased in a structure is appropriate, as noted above, refining nume phased in a structure to appropriate the appropriate description of the structure phased in the structure of
	review, noweed, SEPA requires the agency to consist all worse-case analysis. The DETS does not allempt to characterize actual impacts non-street dosures, surface construction impacts
	surface construction and staging areas of other construction impacts.
	WaFd Bank requests the DEIS be withdrawn until further study of business impacts and construction costs are quantified.
	Sincerely,
	WaFd Bank
	Brent J. Beardall
	President and CEO

Brookfield Properties

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

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of Brookfield, which is the owner of the properties located at 400 Pine Street (TPN 9301500000) (the "Property") to provide comments on the Draft EIS for the WSBLE project. The Property is developed as Westlake Center with multiple retail tenants.

While we support the Sound Transit project, we are concerned that the Draft EIS does not describe the potential impacts of the WSBLE project on the Property and Downtown Seattle. As you know, the retail core is extremely fragile and has undergone an ordeal during COVID. It is critical that the WSBLE project does not contribute further to these problems.

We therefore offer the following comments:

- The Draft EIS shows a future light rail station entrance located generally where the Starbucks pad is located on the plaza of Westlake Center. We are concerned about the location and size of this station entrance, which may take over the majority of the plaza area. There are already station entrances on the adjacent blocks on Pine Street to the north and the south; yet another station on the plaza seems unnecessary. Sound Transit should find a different location for this station entrance.
- The proposed station entrance on the plaza will reduce the pedestrian quality of the plaza area. Furthermore, it will block visibility to the retailers at Westlake Center, impacting sales and leasing for the retail project.
- We are concerned that the duration of construction on the plaza may extend for a decade. The impact to retail visibility and accessibility may have dire consequences for Westlake Center. The Draft EIS should discuss all these issues.
- The Draft EIS provides little or no definition regarding the project, the size and location of abovegrade structures, the limits or duration of construction, impacts to traffic and transit use from numerous extended street closures and the like.

Chicago Corporate Office 350 N. Orleans Street, Chicago, IL, 60654 T +1 312 835 4764 brookfieldproperties.com

- The cumulative impacts throughout the retail core will pose a grave danger to the vitality of this critical area in the middle of Downtown. The Draft EIS does not confront these likely impacts or suggest any serious or realistic mitigation to address these unavoidable impacts.
- Sound Transit should prepare a supplement to the Draft EIS that fully describes the WSBLE project and evaluates all impacts associated with the proposal.

Seattle's retail core has suffered the loss of hundreds of thousands of square feet of retail space in the last five years. The WSBLE project may only reinforce this unfortunate trend. We note that Sound Transit proposes to demolish multiple sites or portions of sites in the retail core for its project. We encourage Sound Transit to work with the City of Seattle to develop a new zoning vision for the retail core, one that provides greater opportunities for housing and jobs near Westlake Station. We would support such a proposal and would look forward to collaborating with Sound Transit and the City of Seattle to achieve such a vision.

We appreciate the opportunity to provide these comments.

Sincerely,

lona Insemii

James Varsamis Senior Vice President, Development

Chicago Corporate Office 350 N. Orleans Street, Chicago, IL, 60654 T +1 312 835 4764 brookfieldproperties.com Sellen Construction 227 Westlake Ave. N. P.O. Box 9970 Seattle, WA 98109 Westlake Property Holdings, LLC 227 Westlake Ave. N. Seattle, WA 98109

April 26, 2022

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

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of Westlake Holdings LLC, which is the owner of the property located at 227 Westlake Avenue N. (TPN 1986200070) (the "Property") and Sellen Construction, the tenant in 227 Westlake, to provide comments on the Draft EIS for the WSBLE project. The Property is presently developed with a 65-foot tall, 39,000 sf office building. However, the Property is zoned SM-SLU 175/85-280, which indicates that a 28-story apartment building is developable on the Property. Buildings of this size or greater have been developed in the immediate vicinity in the last five years and, as owners of the property, we intend to redevelop it to its full potential.

From our review of the Draft EIS, it appears that the plans for the WSBLE project involve the construction of a tunnel beneath the Property. The relatively shallow depth of the tunnel in this location will seriously compromise future development of the Property. The Draft EIS should review and explain the impacts of such tunnel construction on future development of parcels like the Property that are located on the WSBLE alignment. One purpose of WSBLE is to provide high-capacity transit service to transit-oriented developments in the Center City of Seattle. It would be counterproductive for the WSBLE line to prevent the development of such a TOD project on the Property.

Overall, 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 in South Lake Union. Ultimately, Sound Transit will establish a maximum pressure that development above may place on the tunnel, and this pressure limit will restrict development above. Yet there is nothing in the Draft EIS to analyze this impact. The Draft EIS should evaluate all these impacts.

We also note the potential to close several streets, some for extended durations, in the vicinity of the Property. These street closures will lead to unsustainable levels of congestion unless mitigation is provided. The Draft EIS does not explore these issues, and it should. Sound Transit should thoroughly evaluate the impacts associated with these street closures and develop a mitigation plan to ensure that these impacts are fully addressed.

We support the WSBLE project, but Sound Transit should ensure that the Draft EIS fully describes the potential impacts of the WSBLE project on the Property and Downtown Seattle. This additional analysis should be provided for public review and comment in the next phase of the project.

We appreciate the opportunity to provide these comments.

Sincerely,

Scott B. Redman CEO Sellen Construction

Allanken

Wilf Wainhouse Managing Member Westlake Property Holdings, LLC

Windsor Cirrus LLC Windsor Advisers 2030 Eighth Avenue 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: <u>WSBLEDEIScomments@soundtransit.org</u>

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 Windsor Cirrus LLC and Windsor Advisers 2030 Eighth Avenue LLC, the co-owners of the 355-apartment unit mixed use property located at 2030 8th Avenue (TPN 0660000575) known as Cirrus.

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 Cirrus. The Draft EIS should explore alternatives to such a closure. Further, the planned closure of 9th Avenue north of Cirrus, together with the Westlake Avenue closure, will isolate Cirrus from the heart of Downtown. Alternatives to the 9th Avenue closure should also be explored.
- The isolation of Cirrus will negatively impact our residents and the operations of Cirrus. 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 seems that public use of the newly-constructed City park across the street from Cirrus (to which affiliates of the owners of Cirrus greatly contributed) will be lost for a decade. This loss will negatively impact the public, our residents and the attractiveness and usability of Cirrus. Of course, the noise and vibration from the nearby construction will also negatively impact Cirrus and its residents. The Draft EIS must evaluate these

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

impacts.

• 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,

Windsor Cirrus LLC, a Delaware limited liability company

Elton Lee, Vice President

Windsor Advisers 2030 Eighth Avenue LLC, a Delaware limited liability company

By:

By:

Elton Lee, Vice President



PRINCIPALS: H. JON RUNSTAD WALTER R. INGRAM GREGORY K. JOHNSON

April 25, 2022

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

Via email to <u>WSBLEDEIScomments@soundtransit.org</u>

Re: Rainier Square Tower and 400 University Comments on the West Seattle and Ballard Link Extension Draft Environmental Impact Statement

Dear Ms. Swift,

Thank you for the opportunity to comment on the West Seattle and Ballard Link Extension ("WSBLE") Draft Environmental Impact Statement ("DEIS"). This comment letter is submitted on behalf of RSQ Tower, LLC, and WRC 400 University, LLC, affiliates of Wright Runstad & Company ("WRC"), which ground lease Units A and B of the Rainier Master Condominium (recorded under King County Record No. 20170906001029) that is within the Metropolitan Tract owned by the University of Washington in Downtown Seattle. Units A and B are generally located on the block bounded by Union Street, 5th Avenue, University Street, and 4th Avenue. WRC has recently redeveloped the Units as two mixed-use buildings. The first building, "Rainier Square Tower" is an 850-foot-tall, 58-story tower containing nearly 200 residential units, 730,000 square feet of office, 90,000 square feet of retail uses including a recently opened grocery store, and seven levels of below-grade parking. The second building, "400 University" is a 10-story, 110,000 square foot office and retail building.

The WSBLE represents a once-in-a-century transit investment to connect the southwest and northwest neighborhoods of our City to the central core. It will provide reliable, sustainable, and equitable transit service that thousands will rely on daily. It is no small feat, and we thank Sound Transit for its diligent work to make this project a reality.

The DEIS addresses preferred alternatives and anticipated impacts for the WSBLE's alignment through Downtown. However, WRC has concerns about the DEIS's level of discussion and analysis of construction, traffic, and cumulative impacts. Additional study must be completed as suggested below so the Final EIS ("FEIS") can meet the mark for adequate environmental review.

WSBLE Draft Environmental Impact Statement Comments April 25, 2022 Page 2

I. Direct Construction Impacts

The FEIS must provide more information on construction means and methods, and construction monitoring and mitigation plans to protect existing buildings. The Downtown Segment Preferred Alternative DT-1 proposes a tunnel line in 5th Avenue adjacent to Rainier Square Tower, through property owned by the University. No specific tunnel construction method is specified. Rainier Square Tower's parking garage extends seven levels beneath the 5th Avenue sidewalk, and tiebacks and soldier piles from the Tower's construction extend below and east of the structure. From the diagrams provided by Sound Transit, it does not appear that the tunnel structure would directly interfere with the existing Tower parking garage or shoring elements (see attached plans and section by MKA structural engineers), but this specific below-grade condition should be acknowledged, studied, and validated further in the FEIS. These necessary additional details should also be based on the specific construction method(s) selected.

In addition, the DEIS provides insufficient information with respect to anticipated construction mitigation plans. The DEIS soils analysis notes that "Downtown Segment alternatives would be tunneling through more stable glacial soils," DEIS page 4.3.11-6. However, MKA reports there is always some subsidence of adjacent soils with tunnel construction. The amount of subsidence depends on the soil type, groundwater conditions, construction methods, and contractor skill. The FEIS should identify anticipated subsidence ranges on a block-by-block basis based on these variables, and it should detail proposed measures to fully mitigate any associated impacts. Among other measures, mitigation should include robust monitoring of buildings and surfaces to detect any earth movement, with alarms at different movements and robust contingency plans. Proper alarms will depend on the installation methods, and the tolerance of the buildings and surface components to deflection. The monitoring systems should, at minimum, (a) be operational on a full-time basis from the commencement of tunnel construction, (b) provide for third-party monitoring and review, (c) establish site-specific standards for any acceptable soil movement as well as an action plan if movement exceeds acceptable standards, and (d) provide weekly reporting to property owners and users. The robust subsidence monitoring completed during construction of the State Route 99 bored tunnel in Downtown provides a good model for the type of monitoring that must occur. Finally, if there is a significant subsidence event, contingency plans should fully mitigate impacts, including economic impacts to building owners, to ensure safe conditions for existing buildings.

II. Transportation Impacts from Construction

The DEIS discloses significant street closures in the vicinity of the Rainier Square Tower and 400 University buildings. Under Alternative DT-1, segments of 4th and 5th Avenues to the north and to the south would be fully or partially closed for several years during construction. *See* DEIS Table 3-30. Nearby portions of Pike, Pine, and Madison Streets would similarly be fully or partially closed. *Id.* In comparison, street closures under Alternative DT-2 appear to be notably fewer and primarily limited to partial closure of 6th Avenue and the James Street I-5 off-ramp. *Id.* The DEIS does not discuss whether all of the anticipated street closures under Alternative DT-1 would occur simultaneously or sequentially, and it does not measure how cumulative street

closures from WSBLE construction will impact traffic congestion and transit access throughout Downtown. This is a data gap that must be filled in the FEIS. Further, the DEIS acknowledges that sidewalk closures would be coordinated with street closures, but it does not provide a specific plan for sidewalk closures and retained walking routes for the duration of WSBLE construction. Lastly, transit access will be constrained, including access to the dedicated bus lane on 4th Avenue that would be impacted by street closures.

The Rainier Square Tower and 400 University buildings heavily rely on 4th and 5th Avenues for pedestrian, transit, and vehicle access, and street and sidewalk closures will have significant impacts on access for building tenants, employees, and patrons. Maintaining reliable, safe, and efficient circulation through Downtown is imperative, and more detailed study needs to be included in the FEIS to fully disclose the anticipated cumulative transportation impacts across Downtown from WSBLE construction. The FEIS should also provide a plan for maintaining walking, driving, and transit routes across and through Downtown for the duration of WSBLE construction and to fully mitigate impacts, including economic impacts to building owners from business and tenant displacement where convenient access is impaired.

III. Vibration Impacts

The DEIS acknowledges residential uses Downtown as a Category 2 sensitive use, but it does not identify any vibration impacts on the residential units in Rainier Square Tower. *See* DEIS page. 4.3-7-11. Given the close proximity between the tunnel and the Rainier Square Tower foundations, the FEIS should provide additional site-specific information on the expected vibration levels anticipated from tunnel construction and operation to validate this conclusion, or it should identify appropriate mitigation measures.

IV. Cumulative Impacts with Reasonably Foreseeable Development

The FEIS must provide further analysis of the cumulative impacts from WSBLE construction and reasonably foreseeable public and private pipeline development projects. The DEIS includes a list of completed and proposed projects in Appendix K, but this information is from May 2021, so it is nearly a year out of date. The FEIS should update this list with all new permits submitted since then, and in order to account for projects that will be proposed later but still constructed simultaneously with the anticipated decade-plus construction duration for WSBLE, it should assume a baseline of ongoing development in Downtown based on historic trends. Development in Downtown will not just freeze because of WSBLE construction, and without a future-looking analysis, it is not possible to adequately access potential cumulative impacts or appropriate mitigation measures. There could be significant impacts from simultaneous construction of projects with WSBLE on traffic, noise, air quality, public services, and other elements of the environment. The FEIS must fully analyze these reasonably foreseeable impacts and assign appropriate mitigation measures. WSBLE Draft Environmental Impact Statement Comments April 25, 2022 Page 4

V. Conclusion

Thank you for this opportunity to comment. We strongly support the end goal of providing an interconnected transit system represented by the WSBLE but respectfully request that its construction and operation fully mitigate the significant anticipated impacts on Downtown. More work is needed in the FEIS to hit the mark. Please don't hesitate to reach out to me should you have any questions.

Thank you,

Gregory K. Johnson

Chief Executive Officer Wright Runstad & Company for RSQ Tower, LLC and WRC 400 University, LLC

GKJ/jkh

Attachments: Plans and Sections along 5th Avenue between University and Union Streets



Structural + Civil Engineers

CONSTRUCTION





SECTION - 5TH AVENUE (SOUTH)

	SECTION - 5TH AVENUE (SOUTH)	DATE: 3/30/2022 DRAWN BY:JJP SHEET NO: 2
MAGNUSSON KLEMENCIC ASSOCIATES	SOUND TRANSIT WEST SEATTLE AND BALLARD LINK EXTENSIONS	- NOT FOR - CONSTRUCTION



2 SECTION - 5TH AVENUE (NORTH) 1 3 SCALE: 1" = 10' H/V

	SECTION - 5TH AVENUE (NORTH)	DATE: 3/30/2022 DRAWN BY:JJP SHEET NO: 3
MAGNUSSON KLEMENCIC ASSOCIATES	SOUND TRANSIT WEST SEATTLE AND BALLARD LINK EXTENSIONS	- NOT FOR - CONSTRUCTION