



# DEIS Comment Letters

## **Projectwide Businesses and Business Organizations**



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Peter J. Schrappen, CAE  
Vice President – Pacific Region

April 28, 2022

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

Re: WSBLE Draft Environmental  
Impact Statement

Dear Ms. Smith:

On behalf of the American Waterways Operators (AWO), I appreciate the opportunity to comment on the West Seattle and Ballard Link Extensions (WSBLE) draft Environmental Impact Statement (DEIS).

AWO is the tugboat, towboat, and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry safely and efficiently moves over 665 million tons of cargo each year, including more than 60% of U.S. export grain and significant bulk and containerized cargoes transported along the Pacific Coast. Sixteen AWO member companies are headquartered in Washington, and many more operate tugboats, towboats, tank barges, and deck barges in Washington waters. Towing vessels move tens of millions of tons of freight every year on Washington waterways, reducing congestion on the state's highways and railroads while producing fewer pollutants than trucks and trains. In addition, harbor and ship assist tugboats perform shipdocking, tanker escort, and fueling services in Washington's harbors and ports.

AWO has serious concerns about the bridge alternatives for the Interbay/Ballard segment of the WBSLE as outlined on pages 38 & 39 of the DEIS. Alternative IBB-1a, IBB-1B, and IBB-3 would each create a serious obstruction to navigation in the Lake Washington Ship Canal (LWSC). Multiple AWO members are located east of the Ballard Bridge, and they would be severely harmed by these alternatives. The proposed bridges would introduce a vertical navigation clearance limit where one does not currently exist and a potential horizontal navigation clearance limit, if not properly aligned with the Ballard Bridge.

Impeding marine traffic through the LWSC could shutter businesses who depend on the waterway for their operations. This would extend to the numerous businesses throughout the Pacific Northwest and beyond that depend on marine transportation to get their goods to market. It would damage Washington's thriving export trade and impair delicate supply chains.

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The proposed alternatives would also cause undue harm to communities in Alaska that depend on barge transportation for essential goods like food and fuel.

AWO strongly supports alternatives IBB-2a and IBB-2b. Building a tunnel beneath the LWSC would provide minimum impact to vessel operators and the industries and communities they serve while allowing Sound Transit to expand the regional light rail system. Constructing a tunnel would not interrupt maritime operations, and a completed tunnel would not impede safe navigation of the LWSC.

For the Duwamish Segment of the WSBLE, as outlined on pages 10-12, AWO's comments complement the letter sent from Pacific Merchant Shipping Association (PMSA). We oppose the DUW-2 alternative. The northern crossing of the Duwamish Waterway and Harbor Island would interrupt operations at Terminal 5 and displace important maritime businesses. The southern crossings represented by preferred alternative DUW-1a would be less disruptive to maritime operations. Furthermore, avoiding additional obstructions, such as guideway columns, would limit disruptions to maritime companies who operate on the Duwamish.

The DEIS process requires an examination of the impacts to commercial resources. Alternatives IBB-1a, IBB-1B, and IBB-3 would harm Washington's \$38 billion maritime economy as well as the wider regional economy. The report should also consider the environmental impact of shifting freight off the waterways and onto landside modes. Barge transportation emits 30% less greenhouse gas emissions than rail and more than 1,000% less than trucks. If this plan displaces barge operators, those emission reductions would be eliminated, increasing the carbon intensity of transportation in the Pacific Northwest.

Thank you for the opportunity to comment on an issue that is of great importance to AWO members. The decision will impact local maritime companies, their customers, the regional and national economy, and the supply chain. AWO would gladly answer any questions or provide further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Schrapfen". The signature is fluid and cursive, with a large initial "P".

Peter Schrapfen  
Vice President – Pacific Region



Calvin Nutt, PE  
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April 28, 2022

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

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

BNSF Railway Company is pleased to provide comments on the Draft Environmental Impact Statement (DEIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project.

Some key priorities from the attached comment sheet are listed below.

1. Any proposed alignment that is over, under, adjacent to or on BNSF property has the potential to impact BNSF's operations and maintenance. It is BNSF's priority that these situations be avoided in the design of the WSBLE as much as possible.
2. Some of the noteworthy concerns we have observed in the concept plan set include:
  - a. Proposed alignments through SODO Busway appear to encroach on BNSF right of way and the tracks that are on them are not addressed on the concept plans. BNSF has not approved removal of track on this property.
  - b. Duwamish Segment Option DUW-1a - the biggest concern of this segment is the proximity of the alignment to the BNSF operable bridge over the West Duwamish waterway. It will impact BNSF's ability to operate and maintain this bridge.
  - c. Duwamish Segment Option DUW-2- the biggest concern with this option is that it has 2 structures over the mainline track which would be more restrictive and likely more disruptive to BNSF operations than the other options.
  - d. Chinatown International District Segment options CID-1a and 1b appear to be quite impactful to BNSF track structure and tunnel and present feasibility and constructability issues while option CID-2a - 5<sup>th</sup> Avenue Shallow Option is least impactful to BNSF and is preferred.
  - e. South Interbay Segment Options SIB-1 and SIB-3 alignments are in close proximity to BNSF tracks while SIB-2 is not therefore SIB-2 is preferred by BNSF.
  - f. Interbay/Ballard Segment Options IBB-1a, 2a and 2b alignments appear to be more impactful to BNSF tracks where they begin on the Interbay end therefore BNSF prefers the alignments of options 1b and 3.

BNSF appreciates the opportunity to review and comment on the DEIS concept plans and look forward to future discussions regarding this proposed project.

Respectfully,

Calvin Nutt  
Manager Engineering  
BNSF Railway Company

During review of the concept plans for the proposed West Seattle and Ballard Link Extension projects there are numerous options/alignments that impact BNSF tracks and right of way.

In general BNSF has standards and procedures for dealing with and processing proposed agency projects. The general comments 1-8 below refer to the standards and processes that apply to every location that the WSBLE project impacts BNSF track and right of way.

General comments that apply to all segments:

1. BNSF opposes any WSBLE infrastructure that inhibits current alignments and operations as well as any that restrict future expansion prospects.
2. BNSF expects that WSBLE will clear-span BNSF right-of-way in locations that it must cross it.
3. BNSF has concerns about geotechnical impacts to existing track and structures caused by proposed WSBLE structures and tunnels.
4. BNSF requires 3rd party review of proposed structures that could create geotechnical loading impacts on BNSF track/structures.
5. Infrastructure that may create geotechnical impacts on BNSF track/structures will require monitoring for movement during and after construction.
6. Any shoring that may be necessary on or near BNSF property must be designed and processed per the BNSF/UP guidelines for temporary shoring.
7. Utilities that must be relocated and impact BNSF property must be designed and permitted per the BNSF utility accommodation policy.
8. Any structures over BNSF ROW must be designed and processed through BNSF in per the BNSF/UP guidelines for railroad grade separation projects.

Additional comments by segment/option:

**Sodo segment:**

**Options SODO-1a, 1b, 2 Referencing sheets L50-GSP718, 1218, 118, 618, 716, 116, 616 - alignment along SODO Busway and proposed SODO Station**

BNSF is concerned that the proposed alignment along the SODO busway appears to encroach on BNSF property rights. There are existing tracks to the west of Sodo busway that are not called out on the concept plan but appear to be impacted. BNSF has not approved removal of track on this property.

**Duwamish Segment:**

**Option DUW-1a-Reference sheets L50-GSP119, 120, 121, 122, 130- Version DUW-1a**

Specific areas of concern:

Adjacent to and over BNSF tracks along SODO busway at Franz Bakery and over and adjacent to the 7th Ave lead where it crosses 6th Ave, it crosses over BNSF mainline near Spokane Street, It crosses over the south leg of the West Seattle Wye and the BNSF tracks near Colorado Ave, It crosses the BNSF track very close to the east end of the bridge over the West Duwamish waterway and it crosses BNSF track along West Marginal Way.

The biggest concern of this segment is the proximity of the alignment to the BNSF operable bridge over the West Duwamish waterway. It will impact BNSF's ability to operate and maintain this bridge. Second biggest concern is the proximity of substructure to the BNSF mainlines where it crosses near Spokane Street as this will have constructability issues and likely to cause service interruptions to mainline traffic.

**Option DUW-1b - Reference sheets L50-GSP619, 620, 621, 622, 630**

Specific areas of concern:

Adjacent to and over BNSF tracks along SODO busway at Franz Bakery and over and adjacent to the 7th Ave lead where it crosses 6th Ave, it crosses over BNSF mainline near Spokane Street, it crosses over the south leg of the West Seattle Wye and the BNSF tracks near Colorado Ave and it crosses BNSF track twice along West Marginal Way.

The biggest concern is the proximity of substructure to the BNSF mainlines where it crosses near Spokane Street as this will have constructability issues and likely to cause service interruptions to mainline traffic.

**Option DUW-2 - Reference sheets L50-GSP719, 720, 721, 722, 730**

Specific areas of concern:

Adjacent to and over BNSF tracks along SODO busway at Franz Bakery and over and adjacent to the 7th Ave lead where it crosses 6th Ave. This is different from versions 1a and 1b in that instead of having 2 adjacent structures forming a wye at Franz Bakery the south leg is off a different branch line to the south. There are two crossings over the mainline near Spokane Street that are close together. It crosses BNSF tracks at Colorado Ave and possibly on BNSF property rights between Colorado Ave and Alaskan Way and west of Alaskan Way. It crosses BNSF tracks and encroaches BNSF property rights between the east and west Duwamish Waterways.

The biggest concern with this option is that it has 2 structures over the mainline track which would be more restrictive and likely more disruptive to BNSF operations than the other options.

**Delridge Segment:**

A review of the conceptual plan set does not indicate that this segment encroaches on any BNSF right of way.

**West Seattle Junction Segment:**

A review of the conceptual plan set does not indicate that this segment encroaches on any BNSF right of way.

**Chinatown International District Segment:**

**CID-1a- 4th Ave Shallow Option - reference pages L50-GSP715, 714, 713**

Specific areas of concern:

This option has significant potential conflict with BNSF track structure and Seattle Tunnel. The profile on the concept plans do not specifically call out the BNSF track and tunnel but they are definitely impacted. BNSF has concerns/doubts as to the feasibility of this concept from a constructability standpoint.

**CID-1b- 4th Ave Deep Option - reference sheets L50-GSP515, 514, 513**

Specific areas of concern:

This option has significant potential conflict with BNSF track structure and Seattle Tunnel. The profile on the concept plans does not specifically call out the BNSF track and tunnel but they are definitely impacted. BNSF has concerns/doubts as to the feasibility of this concept from a constructability standpoint.

**CID-2a- 5th Ave Shallow Option- reference sheets L50-GSP 115, 114, 113**

Specific areas of concern:

Option CID-2a is the least impactful to BNSF of the options in the Chinatown International District. While there could be some subsurface impacts that would need to be addressed, this option is further away from BNSF than the others and is preferred.

**Downtown Segment:**

**DT-1 5th Avenue Harrison Street Alternative - reference sheets L50-GSP112, 111, 100, 101, 102, 103**

Specific areas of concern:

The primary concerns of impacts to BNSF from Option DT-1 are ventilation shaft and entrance structure that appear to be in close proximity to BNSF tunnel. Any design/construction that is in close proximity to BNSF tunnel would require 3rd party review and monitoring to determine any possible adverse impacts.

**DT-2 6th Avenue /Mercer Street Alternative - reference sheets L50-GSP712, 711, 700, 701, 702, 703**

Specific areas of concern:

There are not any BNSF conflicts that were apparent in reviewing this alignment.

**South Interbay Segment:**

**Option SIB-1 Galer Street Station Central Interbay Alternative reference sheets L50-GSP104, 105, 106, 107**

Specific areas of concern:

The primary concern about this option SIB-1 is the close proximity the alignment is to the BNSF tracks in the area of the Interbay Golf Center, possible property encroachments and inhibit future expansion.

Additionally, changes to surface traffic patterns and the potential for increased trespassing activity will have a negative impact on BNSF operations.

**Option SIB-2 Prospect Street Station 15th Avenue Alternative reference sheets L50-GSP304, 305, 306, 307**

Specific areas of concern:

There were not any BNSF impacts that were apparent in reviewing this alignment. This is BNSF's preferred option for the SIB segment.

**Option SIB-3 Prospect Street Station Central Interbay Alternative reference sheets L50-GSP704, 705, 706, 707**

Specific areas of concern:

The primary concern about this option SIB-3 is the close proximity the alignment is to the BNSF tracks in the area of the Interbay Golf Center, possible property encroachments and inhibit future expansion. Additionally, changes to surface traffic patterns and the potential for increased trespassing activity will have a negative impact on BNSF operations.

**Interbay/Ballard Segment:**

**Option IBB-1a Preferred Elevated 14th Avenue Alternative- reference sheets L50-GSP108, 109, 110.**

Specific areas of concern:

The primary concerns with this alignment are that it starts in close proximity to BNSF tracks at Interbay Station, Crosses BNSF tracks at Blewett Way and crosses BNSF ROW on 14th AVE north of NW45th St.

**Option IBB-1b Elevated 14th Avenue Alignment Option (from Prospect Street Station/ 15th Avenue) reference sheets L50-GSP808, 809, 810**

Specific areas of concern:

The primary concerns with this alignment are it crosses BNSF tracks at Blewett Way and crosses BNSF ROW on 14th AVE north of NW45th St.

**Option IBB-2a Preferred Tunnel 14th Avenue Alternative reference sheets L50-GSP208,209,210**

Specific areas of concern:

The primary concern with this alignment is that it starts out in close proximity to BNSF tracks near Dravus. Because it is a deep tunnel it may be less impactful at the Blewett tracks.



**Option IBB-2b Preferred Tunnel 15th Avenue Station Option reference sheets L50-GSP-508,509, 510**

Specific areas of concern:

The primary concern with this alignment is that it starts out in close proximity to BNSF tracks near Dravus. Because it is a deep tunnel it may be less impactful at the Blewett tracks and ROW at NE45th.

**Option IBB-3 Elevated 15th Avenue Alternative reference sheets L50-GSP308, 309, 310**

Specific areas of concern:

The primary concern with this alignment is that it crosses BNSF tracks near W Emerson.

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  
Email: [WSBLEDraftEIScomments@soundtransit.org](mailto:WSBLEDraftEIScomments@soundtransit.org)

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

I am writing on behalf of numerous property owners, investors, tenants, users, developers and businesses in Seattle to provide comments on the Draft Environmental Impact Statement (“Draft EIS”) for the WSBLE project.

#### **A. Introduction**

As the Draft EIS demonstrates, WSBLE at this stage is not so much a project as an idea. It is a set of lines on a map of the City of Seattle, with boxes showing where various facilities might – or might not – be located. In most locations, the Draft EIS has only one defined method of construction – but little understanding of the means and methods associated with that construction. With WSBLE plans at 5% or less at this Draft EIS stage, their maturity can generously be described as “conceptual.” Without defined construction locations, plans, sequencing or designs, it is impossible to characterize the impacts of WSBLE. The Draft EIS serves a purpose, but not to reasonably evaluate the potential significant adverse environmental impacts of the proposal and the mitigation for those impacts.

This is because WSBLE does not truly constitute a “proposal” under the State Environmental Policy Act, Chapter 43.21C RCW (“SEPA”). Under WAC 197-11-784 a proposal “exists at that stage in the development of an action when an agency is presented with an application, or has a goal and is actively preparing to make a decision on one or more alternative means of accomplishing that goal, *and the environmental effects can be meaningfully evaluated.*” (Emphasis supplied.) As we shall see, the environmental effects of WSBLE cannot be meaningfully evaluated at this time.

Compare this to another recent major project, Climate Pledge Arena. The EIS for Climate Pledge thoroughly evaluated a host of environmental impacts based on a well-developed set of project plans. Impacts to transportation, noise, land use, views and other elements of the environment were specifically and carefully evaluated. This is the level of detail required for SEPA review of a project, and even the most cursory review of the Draft EIS will show that it falls far short of this mark.

The underlying rationale for producing a SEPA document so meager on details may be this: some or all of WSBLE may be a design-build project. For design-build projects to produce their intended financial benefits for Sound Transit, the largest possible number of decisions on project design and construction methods must be left to the design-build contractor. This is how the contracting party – in this case, Sound Transit – has the best opportunity to reap financial benefits in the form of lower final contract pricing. Thus, for design-build projects, the overriding incentive is to avoid commitments, restrictions or limitations on the ultimate discretion of the design-build contractor.

While this process may offer some financial benefits to Sound Transit, it runs entirely counter to the objective of the SEPA review process.

The Draft EIS is a useful first document in a phased review process under SEPA, but it cannot be the baseline environmental document on which future project decisions can be made. Nor is it possible or appropriate to attempt to remedy these shortcomings in a Final EIS, since that would deprive the public of the opportunity to review and comment on a legitimate impact evaluation under SEPA.

At several thousand pages, there is no doubt that the Draft EIS is a formidable document. But document thickness is not a substitute for quality of SEPA review. Phased review under SEPA is required for WSBLE, since environmental impacts cannot be meaningfully evaluated – and authentic mitigation plans prepared – until plans are more fully developed.

## **B. General Comments**

### **1. The WSBLE proposal is not adequately defined.**

The WSBLE proposal is not adequately defined because the Draft EIS is based on an ill-defined set of construction plans. This makes it impossible to characterize future impacts. WSBLE plans are at no more than 5% completion, which means that most key elements of the project are not yet defined, such as:

- a. Horizontal and vertical control for each alignment alternative;
- b. Actual construction methodology, so that noise and vibration impacts cannot be 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, in order to determine the cumulative impacts of construction work on the urban environment.

As noted above, the reasons for these deficiencies may include a sense of haste to achieve project approval and a desire to defer actual decisions about construction means and methods and project design to some future contractor. Whatever the reason, the project is simply not adequately defined to enable Sound Transit to adequately evaluate impacts and mitigation, as required under SEPA. It is worth noting that a private development proposal – such as Climate Pledge Arena – could never pass muster in SEPA review at this unripe level of plan development. There should not be a separate standard for a public project that will impact more people, more neighborhoods and more economic activity than any project in the history of the City.

2. The impacts of the WSBLE proposal are not adequately defined.

If the WSBLE proposal is not adequately defined, then it follows inevitably that the impacts of the WSBLE proposal cannot be adequately defined in the Draft EIS. This letter will review the deficiencies in the Draft EIS regarding the Draft EIS review of potential impacts of the WSBLE project. Since we know that this lack of detail will be cured by further project development in the time ahead, it is appropriate (as discussed below) to employ the “phased review” process under SEPA for this project.

3. Project mitigation decisions are being deferred.

It appears to be Sound Transit’s plan to roll out mitigation proposals gradually over several years. Mitigation planning work remains ongoing and we expect to see a more serious mitigation plan in the months ahead – though some time subsequent to the close of the public comment period on the Draft EIS. Other mitigation plans will need to await the day when elements of the project are actually defined, which may not occur until well after the SEPA process is complete.

Obviously, this is not an appropriate way to conduct the process of SEPA review. Mitigation measures should be identified now and the public should have a full opportunity to comment on them in SEPA review. Mitigation measures must be binding on the design-build contractors for the project. The Sound Transit Board must be able to review and assess these mitigation measures prior to rendering a final decision on the project.

This is not the approach taken in the Draft EIS, which carefully avoids commitments as to mitigation. The identification and evaluation of mitigation should occur now, when such plans are subject to public comment, not when public comment is closed.

4. Sound Transit should conduct Phased Review under SEPA for WSBLE.

Due to the lack of current information on the WSBLE project, which makes it impossible to meaningfully evaluate project impacts, the Draft EIS must be conducted as part of a phased review process under SEPA. *See* WAC 197-11-060(5). Due to the infancy of the project plans, the desire to defer actual construction decisions to some future design-build contractor and the lack of information about most impacts, it is necessary to phase this SEPA review so that review of actual on-the-ground impacts can occur in the future at a time when there is adequate information to support that review.

The current Draft EIS is not a project action EIS, since the actual project is hardly defined at all; it is more in the nature of an early programmatic EIS, which anticipates the need for additional future SEPA review. While it may be appropriate to make large-scale decisions about corridor alignment through this EIS process, future decisions about construction methodology, street closures, final station entrance locations and their design, should require future SEPA review when facts and information are available to allow that review to occur adequately.

5. Sound Transit should conduct a worst-case review of potential impacts from WSBLE.

In circumstances like this one, where information critical to evaluation of environmental impacts is not available, phased review is appropriate, as noted above. Pending future phased review, however, SEPA also requires the agency to conduct a worst-case analysis. But far from conducting a worst-case analysis, the Draft EIS does not even attempt to characterize actual impacts from street closures, surface construction and staging areas or other construction impacts.

WAC 197-11-080 (“Incomplete or unavailable information”) provides as follows:

- (1) If information on significant adverse impacts essential to a reasoned choice among alternatives is not known, and the costs of obtaining it are not exorbitant, agencies shall obtain and include the information in their environmental documents.
- (2) When there are gaps in relevant information or scientific uncertainty concerning significant impacts, agencies shall make clear that such information is lacking or that substantial uncertainty exists.
- (3) Agencies may proceed in the absence of vital information as follows:
  - (a) If information relevant to adverse impacts is essential to a reasoned choice among alternatives, but is not known, and the costs of obtaining it are exorbitant; or
  - (b) If information relevant to adverse impacts is important to the decision and the means to obtain it are speculative or not known;

Then the agency shall weigh the need for the action with the severity of possible adverse impacts which would occur if the agency were to decide to proceed in the face of uncertainty. If the agency proceeds, it shall generally indicate in the appropriate

environmental documents its worst case analysis and the likelihood of occurrence, to the extent this information can reasonably be developed.

Clearly there are gaps in the information on which the Draft EIS is based. As long as these gaps remain, Sound Transit should ensure that it is appropriately adopting a “worst case” analysis for all impacts described in the Draft EIS.

#### 6. Additional Information

Sound Transit has been in a continuous process of WSBLE project development. The information available today is necessarily more robust than when the Draft EIS was prepared. Some of this information is related to new design and engineering solutions to help mitigate possible impacts for specific properties and locations. Other is broader in nature, such as estimates of possible street closures during WSBLE construction.

This ongoing work by Sound Transit is important, but it also highlights the immature condition of the Draft EIS. The information Sound Transit continues to develop is directly relevant to the evaluation of impacts and mitigation under SEPA. It is appropriate to include it in the Draft EIS.

#### 7. The Draft EIS fails to evaluate cumulative growth impacts

It is obvious that the development of new transportation or utility infrastructure will have an indirect impact of inducing future growth. As WAC 197-11-060(4)(d) notes, “impacts include those effects resulting from growth caused by a proposal.” In many areas to be served by WSBLE, including West Seattle, SODO, the CID, South Lake Union, Lower Queen Anne, Interbay and Ballard, the advent of new light rail service will undoubtedly spur the development of buildings housing thousands of new units of housing and jobs. The pressure to rezone many of these areas will increase.

Such inevitable induced development is indeed one of the objectives of WSBLE, and while it may not be an adverse impact by itself, it certainly will lead to secondary and indirect impacts that require evaluation in the Draft EIS. The Draft EIS is silent on such potential impacts, obvious though they are. This shortcoming in the Draft EIS must be remedied.

### **C. Specific Comments on WSBLE Impacts**

The Draft EIS does not seriously attempt to characterize or quantify actual impacts that may result from the WSBLE project. As an example, the new Downtown tunnel proposed as a part of WSBLE will traverse the most densely developed neighborhood in the Pacific Northwest. Downtown Seattle is home to more than 100,000 residents and houses more than 50% of all the jobs in the City of Seattle. Downtown provides half of all tax revenue collected by the City of Seattle.

However, WSBLE proposes, over a period of more than ten years, to demolish and occupy several blocks of Downtown real estate, to close several miles of Downtown streets, in some cases for durations of several years, to interrupt traffic and transit service, to upend the pedestrian

environment in locations throughout Downtown, and ultimately to cause the closure of businesses, loss of substantial tax revenue to the City and loss of jobs to other locations in the region.

In the face of these probable impacts, the Draft EIS includes only a single paragraph discussing such impacts to Downtown (at Section 4.3.3.4.4):

Businesses in the Downtown Segment that could be affected by construction activities are a mix of art and cultural, retail, service, and offices. Station entrance construction at the surface for all stations in this segment would result in road or lane closures and traffic diversion (see Table 3- 28 in Chapter 3 for details on the road closures and durations of closures). Road and lane closures for either Downtown Segment alternative could make access to businesses on those blocks more difficult, but sidewalks would remain for pedestrian access. Most buildings adjacent to road closures are office or residential towers, but disruption from construction activities could affect retail or service businesses on lower floors of these buildings.

And what mitigation is proposed to address such impacts? Signage, cleaning services, a hotline and public meetings and “marketing measures” – but only those “consistent with Sound Transit policy,” whatever that means.

As is clear from this excerpt from the Draft EIS, Sound Transit has not taken seriously its obligation to evaluate impacts and propose effective mitigation in the Draft EIS. Other significant impacts ignored in the Draft EIS include those described below.

#### 1. Construction Sequencing

The Draft EIS suggests that construction on the entire line will commence in about 2026 and continue unabated for 11 years or more. But no effort is made to identify a sequence for this construction. It is not realistic to assume that work on every portion of the line will commence simultaneously, so sequencing will inevitably occur. This sequencing will itself result in the intensification of impacts or the possible mitigation of impacts. None of this is evaluated in the Draft EIS.

The Draft EIS must propose one or more general approaches to construction sequencing and assess how modifications to sequencing of work can be used to mitigate impacts of the project.

#### 2. Transportation Impacts

The discussion of potential transportation-related impacts of the WSBLE project in the Draft EIS is not sufficient. Here are some examples of the areas in which SEPA analysis should be improved:

##### i. Street Closures

The timing, duration and location of possible street closures associated with the project is speculative. Further, this information is not well developed in the Draft EIS. Possible detour routes are not consistently identified and cumulative impacts on transit service not discussed. While a street closure at a regional scale may not be a significant issue, at a parcel and neighborhood level, a

street closure of long duration may have significant adverse impacts. Loss of access to building parking garages and loading facilities could force the shut-down of buildings 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 sequencing of construction activities will either exacerbate or lessen these impacts. The Draft EIS does not thoroughly evaluate these impacts, nor can they reasonably be evaluated until a more definitive street closure plan can be developed in the future.

ii. Impacts to vehicular circulation/congestion

Without a more definitive plan for street closures and a clear construction sequencing plan, it is not possible to predict likely impacts to vehicular circulation in Downtown and along the corridor. Once this information is clear, probable impacts to the street network can be evaluated, and mitigation proposed to address them. The Draft EIS should include this analysis.

iii. Impacts to transit

Similar comments apply to WSBLE impacts to transit routes, operations and usage. It is critical that the WSBLE project not result in a diminution in Metro transit function and usage, but many factors discussed in this letter will put substantial pressure on transit viability during the WSBLE construction period. The Draft EIS should assume worst-case impacts on the transit system and focus on realistic mitigation to mitigate these impacts. Significant mitigation measures may be necessary to maintain transit service and usage in the WSBLE corridor area.

iv. Construction truck traffic

The Draft EIS should discuss the routing of construction trucks through the corridor and identify impacts and mitigation associated with that activity. Hundreds of thousands of cubic yards of material will be removed from the tunnel and station locations and trucked through the heart of Downtown, in and around all the WSBLE street closures. The Draft EIS does not adequately address or proposed mitigation for these impacts.

v. Construction worker access and parking

The WSBLE project will impair access to Downtown and other neighborhoods, including access to parking. The project will also enlist thousands of construction workers. The driving and parking behaviors of these thousands of workers will have significant impacts on the corridor. If these are principally single-occupant vehicle trips, these thousands of new daily trips will impact the street networks around construction sites. And worker parking, whether on-street or off-street, will tend to crowd out parking for employees, customers and residents of neighborhoods.

The Draft EIS does not attempt to evaluate these impacts or propose mitigation for them. To avoid such impacts, worker SOV use and neighborhood parking should be minimized, through mitigation programs implemented by Sound Transit. The Draft EIS must thoroughly discuss these issues and their mitigation.



vi. Impacts to mode split

In the past decade or more, transportation mode splits for commuters Downtown have veered strongly away from SOV use, with increasing reliance on transit, bike commuting and walking. The construction impacts of WSBLE Downtown will tend to make these alternative modes of transportation less hospitable and efficient, and so it should be expected that commuters will, on the margin, return in some numbers to SOV use each day. The cost of light rail construction should not be a decade-long retreat in the significant advances made in this area. With SOV rates as low as they are in Downtown, even small increases can lead to disproportionate impacts. The Draft EIS should evaluate these potential impacts and propose mitigation to address them.

vii. Pedestrian and bicycle impacts

As noted above, the WSBLE project is likely to make pedestrian and bicycle activity Downtown and in other neighborhoods on the corridor less attractive. The Draft EIS should review and assess these impacts and prepare a plan to mitigate them.

3. Blight impacts

Downtown has already suffered through COVID and other street issues in the last several years. The impacts of WSBLE will be visited on a Downtown environment that is already extremely fragile. Even moderate effects of WSBLE on the Downtown environment may lead to over-sized impacts.

i. Pedestrian environment

This letter discusses impacts to the pedestrian environment and to pedestrian behavior in other contexts, but it is also important to acknowledge the potential for urban blight resulting from impacts to pedestrian use. In locations along the corridor where the pedestrian environment is rendered uninteresting, inhospitable and even unsafe as a result of the WSBLE project, pedestrian use will decline. This decline in usage feeds a vicious circle, leading to further declines in street-level business, increases in anti-social behavior and yet fewer pedestrians. We have seen it before Downtown – indeed, we continue to see it today – so we know that it is not only possible, but likely.

The Draft EIS needs to address these likely impacts and to propose broad-ranging mitigation measures to preserve and promote the quality of the pedestrian environment.

ii. Pre-condemnation blight

The Draft EIS identifies dozens of sites along the corridor, including dozens in the Downtown area, as targets for future condemnation. This identification will lead to “pre-condemnation blight” on these properties, making it difficult for them to attract tenants or justify capital expenditures. In the several years between now and actual property acquisition, these properties all along the corridor will suffer from this blight condition.

And we expect that this blight will persist even after construction of the WSBLE project begins. Unmitigated congestion, noise, vibration, security issues and other impacts Downtown and along

the corridor will cast a pall over existing projects. Tenants, both commercial and residential, will be reluctant to lease space during the decade of construction impacts. Projects will need to provide significant lease concessions simply to attract some tenants, thereby impairing financial performance. The lack of tenants leads to lack of revenue, which then leads to reduced levels of activity and capital expenditure. Sound Transit needs to deal with the fact that the scope, extent, duration and intensity of impacts on the Downtown environment, as well as in other areas of the corridor, will inevitably lead to blight effects.

The Draft EIS is silent as to these impacts

iii. Loss of tenants and businesses

In the last several years, Downtown has lost hundreds of small businesses and thousands of employees. The WSBLE project may only accelerate this trend. Other markets in the region offer urban environments less impacted by construction, with strong retail and job growth. These markets may become more attractive to tenants Downtown and along the WSBLE corridor as project construction continues. At a minimum, it is safe to say that the WSBLE project will not promote job and retail growth Downtown; more likely, its impact will be adverse.

The Draft EIS must evaluate this range of impacts and offer serious and continuous mitigation to offset these probable losses.

4. Noise impacts

Sound Transit's last major construction project Downtown was characterized by a number of short-term, last-minute noise variances sought by its contractors, apparently on the fly. The Draft EIS should adopt an overall program regarding noise impacts and variances to guide future construction activities. In some cases, noise variances may actually be useful in limiting and mitigating impacts, in locations where there are few sensitive night-time receptors. But in other cases, noise variances can lead to substantial impacts on a local residential population.

The Draft EIS should lay out some ground rules for the use of noise variances along the corridor, so that residents and businesses may have a predictable view of possible future impacts.

5. Economics

Much of the area within which the WSBLE alignment will be constructed is the highest-density area within the entire Pacific Northwest. It is the home to tens of millions of square feet of office, commercial and life science development as well as hundreds of thousands of residents. Businesses, owners and residents in Downtown and all along the WSBLE corridor are responsible for most of the jobs and tax revenue generated each year by the City of Seattle. It is difficult to imagine that a project with impacts as wide-ranging and long-lasting as WSBLE will not have a significant fiscal impact on the City. The reduction in major property sales will impact REET revenues; loss of jobs to other markets will reduce Jump Start tax and B&O tax revenues; retail sales tax revenues will be affected by reductions in such sales; and some property tax revenues could decline over the more than a decade of construction activities on WSBLE.

The Draft EIS must carefully examine and discuss these impacts and address plans for avoiding or minimizing such losses. Certain City programs may require financial assistance if fiscal impacts become too deep or protracted.

#### 6. Urban design impacts (Land Use)

The very preliminary plans for future station entrance location included in Appendix J to the Draft EIS show that Sound Transit intends to commandeer large chunks of city blocks throughout Downtown Seattle for oversized station entrance structures. Some of these sites occupy full quarter blocks or more. The Draft EIS fails to evaluate several issues associated with this overdevelopment of station entrances, including:

- i. The loss of existing and future businesses, jobs and housing resulting from such station entrances;
- ii. The impact to the urban environment resulting from the substitution of sterile station entrances for thriving urban businesses and retail uses.

The Draft EIS does not attempt to characterize the urban design of the WSBLE above-grade facilities. The design and operation of these facilities will impact the urban environment of Downtown for a century or more and many are in critical locations. For example, between 4<sup>th</sup> and 5<sup>th</sup> Avenues and Pike and Pine Streets, in the heart of the retail core, WSBLE proposes no fewer than three large station entrance structures, occupying in total perhaps a half a city block or more. These entrance boxes, at 5<sup>th</sup> & Pike, 5<sup>th</sup> & Pine and 4<sup>th</sup> & Pine, will supplant existing urban retail, businesses and open space, and replace these features with over-sized headhouses stuffed with station entrances, utilities, ventilation and other equipment. This is hardly the stuff of urban pedestrian activation.

Impacts are similar all along the corridor. In Interbay and West Seattle, aerial facilities will loom over buildings and blocks providing neighborhood services, housing and small-scale commercial uses. We have seen around the world examples of aerial structures that celebrate exceptional design, but there is nothing in the Draft EIS or in Sound Transit's prior development history that suggests this will be the case.

This stands in stark contrast to Seattle's experience in the 1980's with the Downtown Seattle Transit Tunnel and to underground rail systems around the world. These best practices demonstrate that it is possible to integrate an urban transit system with the city in which it lives in a way that is functional for the system and supportive of the urban environment. Sound Transit needs to follow these examples.

Sound Transit must make excellent urban design the key feature of its above-grade structures. These structures must contribute not only to the positive design of the urban environment, but also to its interest, activation and operation. But the Draft EIS is effectively silent on these critical issues.

The Draft EIS must identify the importance of avoiding adverse impacts to the urban environment along the corridor and identify strategies, guidelines, processes and solutions to ensure its above-grade structures will not be a continuing blight on the city it is intended to serve.

#### 7. Displacement of future development

In locations where the guideway is above-grade or in a shallow tunnel and not located in the right-of-way, it will wipe out future development opportunities, including attractive opportunities for TOD development. The same will occur in locations where enormous station entrance and head-house structures supplant high-density development sites along the corridor. These impacts will result in the loss of thousands of units of future housing and future development that would house thousands of jobs, all within close distance of future WSBLE station entrances. Here are just a few examples:

- The loss of development for thousands of jobs at the Salvation Army site on 4<sup>th</sup> Avenue S.
- The loss of 1000 units of housing and other commercial space at the 4C site on 4<sup>th</sup> Avenue between Cherry and Columbia Streets.
- The loss of the existing WaFd headquarters building and its future development potential for hundreds of jobs or housing units at 5<sup>th</sup> & Pike.
- The loss of almost 400 housing units at the development site at 801 Blanchard Street.
- Possible loss of the new state-of-the-art practice facility for the Seattle Storm.
- Possible loss of the home of KEXP.
- Loss of jobs and housing from undefined impacts to vertical construction on future development sites under which the WSBLE tunnel is located.
- The loss of significant TOD development opportunities in the Smith Cove, Interbay and Ballard areas, all of which could one day includes jobs and housing to support a nearby WSBLE station.

The Draft EIS should evaluate the impacts of displacement of new TOD development alternatives that result from the alignment and station location and station entrance alternatives.

#### 8. Loss of affordable housing

The loss of future development as noted above will directly result in the loss of significant funding for affordable housing in Seattle. We estimate that the loss of MHA payments resulting from the WSBLE project could easily exceed \$50 million. The Draft EIS does not identify or evaluate this impact or propose any mitigation for it.

#### 9. Security impacts

The numerous street closures and construction sites and staging areas littered across Downtown will have the effect of isolating pockets of the urban environment, depriving them of pass-through traffic and pedestrians and “eyes on the street.” Locations like 3<sup>rd</sup> & Pine will be cut off from the pedestrian vitality of the retail core and left to deteriorate in this construction environment. Similarly, many east/west streets in Denny Triangle will become cul-de-sacs due to the Sound Transit closure of Westlake Avenue for several years. Environments like these can promote and sustain anti-social behaviors.

The Draft EIS should evaluate the impacts of its wide-ranging construction activities and shut-downs on the security of the streets in Downtown Seattle, as well as in other neighborhoods along the corridor. Adoption of CPTED practices and provision of additional security personnel may be required to mitigate these impacts.

#### 10. Cumulative impacts

As noted above, one of the express purposes of WSBLE is to induce future growth impacts in the City of Seattle. The SEPA Regulations specifically require review of such impacts at WAC 197-11-060(4). To its credit, the Draft EIS does note this potential for induced growth in Section 4.3. Yet the Draft EIS nowhere addresses the obvious secondary and indirect impacts of such intentionally induced growth.

#### **D. Specific comments on mitigation issues**

In addition to revising the analysis of impacts in the Draft EIS so that they can be meaningfully evaluated, the Draft EIS should include a specific set of mitigation measures to address impacts on specific properties resulting from the WSBLE project. Instead, Sound Transit has chosen, contrary to its obligations under SEPA, to defer the presentation of its mitigation plan until after the publication of the Draft EIS. The full mitigation plan should have been included in the Draft EIS.

Although mitigation proposals should be based on specific plans and designed to address specific impacts, there is much more that Sound Transit can do in the interim to characterize approaches to mitigation. Here are some suggestions:

- Transportation
  - Adopt real-time monitoring of congestion levels at key intersections and freeway access points. Implement changes to street closures or other mitigation measures to mitigate impacts.
  - Limit street closures during peak traffic hours
  - Monitor vehicle and transit travel times through Downtown. Implement changes to street closures or other mitigation measures to mitigate impacts.

- Establish a Traffic Mitigation Contingency Fund to provide financial support for future mitigation.
- Truck routes should be monitored and modified in real-time so as to minimize impacts
- Implement key mitigation measures in advance of expected congestion:
  - Operate a downtown shuttle system with access priority to move commuters through areas of high congestion
  - Invest in bike lane improvements
  - Deploy traffic control personnel throughout Downtown
  - Provide subsidies to Metro to enhance transit service through Downtown
  - Install real-time digital signage for transit and commute vehicles to alert drivers to areas of congestion
- Urban design standards
  - In cooperation with City of Seattle, adopt minimum urban design standards for all above-grade WSBLE facilities. Sound Transit adopted the same approach with the City of Bellevue as part of the EastLink project, and the same approach should be employed in Seattle. Please refer to Bellevue Land Use Code Chapter 20.25M. [Part 20.25M Light Rail Overlay District | Bellevue Land Use Code \(municipal.codes\)](#)
  - In order to preserve street-level areas for pedestrian activation, all farebox activities should occur below grade
  - Station entrances should be integrated with existing or future urban development. Station entrance houses should not be gigantic concrete boxes dotting the Downtown and neighborhood landscape.
  - In all cases, the footprint of station entrances houses should be minimized.
  - Station entrance houses should include street level uses
  - Station entrance houses should include transparency above the ground level
  - Venting standards should be implemented to avoid impacts to pedestrians and residents
  - Aerial structures, from top to bottom, should exhibit a high level of architectural design
  - CPTED principles should be incorporated into project design

- The location of aerial facilities, and the structural columns and elements that support them, should be located so as to minimize impacts to the pedestrian environment
- Noise
  - Allow night work away from residential locations, subject to appropriate mitigation
  - Provide guidelines on the use of noise variances, including limits on noise variance requests within 2 blocks of residential uses or other sensitive receptors
- Vibration
  - Provide for real-time measurement of off-site vibration impacts
  - Develop a site-specific plan for mitigation of vibration impacts for sensitive locations
- Pedestrian environment/Local businesses
  - Sound Transit should fund \$1 million/year for downtown activation, to be administered by the Downtown Seattle Association.
  - Implement a “Lunch Downtown” program for WSBL E workers, relying on Downtown and neighborhood restaurants to provide meals, subsidized by Sound Transit. Use Downtown and neighborhood restaurants to cater Sound Transit events.
  - Permanent sidewalk closures should be avoided. Temporary closures should be minimized in duration.
  - Require use of pedestrian sheds to keep sidewalks open. Sheds should provide lighting, architectural interest, graphics, such as the “urban umbrellas” often in use in Manhattan: [Can Upscale Scaffolding Claim Space on NYC's Sidewalks? - Bloomberg](#)
  - Graffiti removal should occur within 24 hours
  - Establish a retail support program for small retailers and restaurants in the corridor area. Provide support for marketing and outreach activities.
  - Provide low- or no-interest loans or grants to small retailers and restaurants impacted by the WSBL E project.
  - Adopt an interpretive approach to construction-area signage and outreach. Celebrate and explain the WSBL E project through local community gatherings and street fairs.
- Construction Management
  - The City of Seattle does not permit private projects to commence construction without a detailed construction management plan. The Draft EIS should discuss

various alternative approaches to such CMPs, how they will be developed and implemented, and how they can be used to mitigate impacts of the project.

- Construction sequencing is a tool that can be used to manage the impacts of project construction. The Draft EIS should develop guidelines for construction sequencing, so as to avoid overlapping and cumulative impacts within the corridor.
- Security
  - Sound Transit should employ extra security personnel around construction sites, to ensure that the resultant street-level blight does not lead to adverse behaviors
  - Cameras should be implemented in areas near construction sites
  - Sound Transit should create a response team with the Seattle Police Department to rapidly address issues near construction sites
- Monitoring & Outreach
  - Real-time monitoring of impacts should occur
  - Sound Transit should provide monthly reports to stakeholders, city and owners
  - Appoint chief compliance officer for all mitigation requirements. This officer should report directly to the CEO.
  - Email and call-in for complaints
- Enforcement
  - Noncompliance with performance standards should result in fines, with such funds used for mitigation of impacts
  - Continued noncompliance results in job shut-down
  - All mitigation and enforcement provisions should be incorporated in WSBLE construction contracts

These and other mitigation measures should be incorporated in the Draft EIS.

**E. The plan to conduct a Board vote to reaffirm the preferred alternative this summer is inconsistent with SEPA.**

Sound Transit plans to conduct a vote of its Board in June or July to reaffirm the preferred alternative for the Final EIS. On April 28, 2022, Sound Transit will have received hundreds of comments on the Draft EIS, many of them technical in nature. Virtually all of the comments will ask Sound Transit to undertake much more detailed review of project impacts and mitigation. Few will suggest that the Draft EIS is adequate in its current form. None of the required evaluation and remedial work will be able to occur –or perhaps even begin – by July 2022 in time for a Board vote.



It is therefore impossible to understand how the Sound Transit Board could have adequate information only several weeks after the close of the Draft EIS comment period to make an informed judgment regarding the preferred alternative. SEPA includes strict limitations on actions by a lead agency prior to completion of the SEPA process. *See* WAC 197-11-070. The Board's reaffirmation of the preferred alternative cannot limit the choice of reasonable alternatives. And the Board will not be in a position to evaluate alternatives for the Final EIS until much additional work is performed in response to Draft EIS comments.

We are concerned that premature action by the Board in the summer of 2022 will only be perceived as contrary to the Board's duties under SEPA, as an attempt to reaffirm a pre-ordained plan. Thoughtful deliberation – not a rush to judgment – should be the keystone of the process ahead. We urge Sound Transit to delay any further consideration of a Final EIS preferred alternative until much more SEPA evaluation is complete.

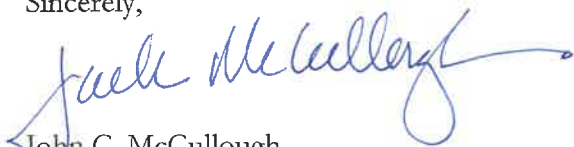
#### **F. Conclusion**

WSBLE will be an important project in the development of the Puget Sound region over the several decades ahead. The Draft EIS is a good start on a program of SEPA review for this project, but it needs more. It would be unfair to the public and the decisionmakers in this case to defer the evaluation of some of the most critical project issues to the Final EIS, when then there is no longer a public opportunity to comment on or affect the SEPA review process. Sound Transit should prepare a supplemental Draft EIS, building on its existing work. This SDEIS can be focused on the missing links in the analysis, so it can be completed by the end of 2022. This will not unduly delay the project, but it will help to ensure that the public has an opportunity to comment on a genuine analysis of project impacts and mitigation before final decisions are made.

There will be those who say that any such delay is unacceptable, that the manifest deficiencies in the Draft EIS – although admitted – should not postpone a process that is already 17 years short of completion. We will hear this from WSBLE supporters, agencies and some elected officials, for whom a mere months-long delay in a nearly 25-year project will for some reason be unacceptable, as though we will all lose our moorings if we do not proceed to approval with all possible haste.

To them, I would recall the old saying about projects: time, cost and quality are the criteria. At best you can optimize two, but often only one. WSBLE is already over-budget and over-time. This is a 100-year+ project. The least we can do, for ourselves and for the generations to come, is to make sure we do it right.

Sincerely,



John C. McCullough

April 28, 2022  
Page 17 of 17

cc: City of Seattle  
Downtown Seattle Association



COMMERCIAL REAL ESTATE  
DEVELOPMENT ASSOCIATION  
**WASHINGTON STATE CHAPTER**

April 28, 2022

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

Dear Ms. Swift,

On behalf of NAIOP Washington State, the Commercial Real Estate Development Washington State (NAIOP) and our more than 1,000 members, we are writing to provide comments on the Draft Environmental Impact Statement for the West Seattle and Ballard Link Extension (WSBLE).

This project represents a 100-year decision for the City of Seattle and Puget Sound region, and will no doubt connect Seattle in ways that will transform the city for decades to come. It also comes with more than a decade of construction, displacement and acquisitions that must be taken into consideration by the Sound Transit Board of Directors to arrive at the best alignment and station locations.

NAIOP and its members are strong supporters of transit infrastructure and the tangential opportunities they create for transit-oriented development and sustainability.

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

**Construction Impacts, Displacement & Mitigation**

Perhaps most importantly, much more detailed information is needed to truly understand the cumulative construction impacts throughout the WSBLE alignment. This includes station and tunnel construction timing and phasing, street closure phasing / duration, detailed information on impacted businesses and displacement, mitigation for businesses that will likely be forced to close and plans for pedestrian, transit and traffic detours. Operating without this base-line level

of information for all alternatives makes it virtually impossible to make informed decisions on a preferred alignment.

The DEIS also must include an accurate assessment of likely construction projects throughout the alignment prior to and during WSBLE construction. The DEIS erroneously 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). This is highly inaccurate and will lead to a mis-aligned construction management plan and subsequent street closures.

The DEIS also states that “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.” Transportation Report, pg. 4-114.) This is also not acceptable and will not lead to a planning outcome that minimizes impacts on downtown and in WSBLE neighborhoods. Sound Transit must account for how WSBLE construction and sequencing, and associated impacts, will most definitely inform which of the WSBLE alignments are best suited for the city.

As arguably the largest infrastructure project to be constructed in Seattle’s history, Sound Transit and the City of Seattle need to go beyond business as usual and traditional practices when considering a robust mitigation program. Business owners, residents, property owners and stakeholder groups should be involved as a mitigation approach and construction management plan is transparently prepared. We support the DSA’s concept of a Steering Committee that would meet this need.

With this in mind, mitigation should at minimum acknowledge:

- Impacts on transit routes during construction. This includes closure of the streetcar for multiple years as well as major transit corridors such as Westlake Avenue, 4<sup>th</sup> Avenue, 4<sup>th</sup> Avenue South, Pike Street, Pine Street, and Madison Street.
- Multi-year closures of major streets throughout downtown Seattle will create irreparable harm to businesses and property owners along these routes. This cannot be mitigated with “businesses are open” signs or simple marketing programs. Realistic solutions must be brought to the table.
- While increasing transit and transit-oriented-development will ultimately improve Seattle’s affordability and accessibility, residential displacements will contribute to the lack of housing and Seattle’s housing unaffordability in the near term.

In addition, we ask Sound Transit to detail plans for maintaining vehicular, pedestrian, commercial load zones, three-minute load zones and delivery/loading dock access to buildings for instances when a street closure effectively walls off a building's only access point for one or more of these modes.

For example, access to downtown sidewalks is paramount for residents, workers and tourists, which also impacts direct access to downtown businesses. The introduction to the "Construction-Related Roadway Modifications" attachment to the Transportation Report says, "[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.

The DEIS is the time to fully analyze the "extent and duration" of downtown sidewalk closures to ensure appropriate mitigation is considered and applied. This is equally the case for bicycle lane impacts and street detours.

### **Downtown Tunnel Construction**

Sound Transit states "Tunnel and underground station construction may involve tunnel boring (using twin or single tunnel boring machines), cut-and-cover construction, or sequential excavation mining."

However, there is no information in the DEIS that describes the difference in impacts between these construction approaches. Each station located along a tunnel alignment has only one identified construction methodology, leaving the public with no information to evaluate how a different construction methodology might change the corresponding impacts.

As such, Sound Transit should evaluate different construction approaches for the new transit tunnel under downtown Seattle and all underground stations currently assumed to be constructed using a cut-and-cover approach. This information should be prepared and presented to the public before the Final EIS is prepared so the public can provide input on the trade-offs associated with different construction approaches and better understand the extent of mitigation required.

It seems employing a single-bore tunnel methodology could present different station access and construction opportunities and could potentially minimize anticipated impacts at surface-level, but it is not possible to assess the trade-offs of either method - both positive and negative - without more information.

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

### **Land Use Planning Near Future Station**

The DEIS also does not consider the City of Seattle’s Office of Planning and Community Development’s Industrial Lands DEIS and future work, which will (by design) add density to industrial areas surrounding the future WSBLE stations.

OPCD states they expect to adopt new regulations in early 2023, which means new projects would be built/finished by the time the WSBLE construction starts. The WSBLE FEIS needs to account for this reasonably foreseeable change in density and include those volumes in its analysis.

### **Station Design**

Downtown’s built environment is densely developed and heavily utilized, as are the Ballard and West Seattle neighborhoods. Large station headhouses that may be more easily accommodated in other parts of the region create an outsized impact in downtown and our neighborhoods – not just during construction, but in perpetuity.

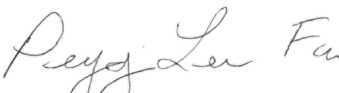
Sound Transit should prioritize station design in these areas that:

- Creatively and positively integrate into the existing environment by employing design principles that are minimally invasive to the existing neighborhood character;
- Avoid displacement and condemnation by exploring opportunities for public / private partnerships and maximizing below-grade station functions
- At bare minimum ensures station configuration and footprints are tailored specifically to support a dense urban core environment.

We urge Sound Transit to look at station design not through a simple “do no harm” lens, but instead as a world-class design opportunity that will add to the fabric of each neighborhood’s built environment.

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

Sincerely,



Peggy Lewis Fu

Executive Director

NAIOP Washington State



April 28, 2022

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

Sent via email to [WSBLEDEIScomments@soundtransit.org](mailto:WSBLEDEIScomments@soundtransit.org)

Dear Ms. Swift,

On behalf of the Pacific Merchant Shipping Association (PMSA), I am submitting comments on the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (DEIS). PMSA represents marine terminal operators, shipping lines, and others in the trade community on the West Coast.

The Ballard to West Seattle proposed light rail line is unlike other existing alignments in that it moves through the maritime trade and manufacturing spine of the region. It goes through two Manufacturing Industrial Centers (MICs), runs adjacent to the homeport of the North Pacific Fishing Fleet, as well as the Port of Seattle's international container terminal facilities. Great care should be given to minimize short term and long-term disruptions in the area. Many of these operations are water dependent and cannot relocate anywhere else.

Based on the information presented in the DEIS, PMSA supports the following:

SODO Segment

More analysis is needed in the Final EIS to fully assess the impacts to freight mobility and account for growth at port container terminals. There is limited information about the impact rail has on freight mobility, limited analysis of day-time traffic impacts when freight is at peak use, and no cumulative effects analysis of the impacts on the interconnected Ballard-Interbay Manufacturing Industrial Center and Greater Duwamish Manufacturing Industrial Center.

Duwamish Segment

PMSA supports the South Edge Crossing Alternative as the preferred alternative. This alternative avoids significant impacts on the operation of the Northwest Seaport Alliance's facilities at Terminal 5 and Terminal 18, as well as the headquarters of SSA Marine, which operates the terminals.


Interbay/Ballard Segment

As described in the DEIS, the current Preferred Elevated 14<sup>th</sup> Avenue Alternative is now estimated to cost as much as \$1.6 billion, bringing it within the range of the two preferred tunnel alternatives. Sound Transit should modify the preferred alternative to identify the Preferred Tunnel 15<sup>th</sup> Avenue Station Option as the preferred alternative.

Thank you for the opportunity to comment on the DEIS. We will continue to engage, particularly in the effort to further study the impacts of this latest line on the ability of the maritime trade community to continue to create jobs and opportunities for growers and manufacturers to access foreign markets.

If you have further questions or need more information please contact me at (206) 441-0182.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jordan Royer', with a long horizontal flourish extending to the right.

Jordan Royer  
Vice President for External Affairs



April 28, 2022

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

Sent via email to [WSBLEDEIScomments@soundtransit.org](mailto:WSBLEDEIScomments@soundtransit.org)

Dear Ms. Swift,

On behalf of the Seattle Marine Business Coalition (SMBC) we are submitting comments on the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (DEIS). SMBC is a coalition of Seattle marine businesses and industry stakeholders with a common goal to grow and sustain the marine industrial business sector in Seattle.

Collectively, the maritime industry, including the members of SMBC provides more than 60,000 direct, good-paying jobs and over \$38 billion in economic impacts to our state annually. Thousands of these jobs and billions of dollars of economic impact from our industry are generated along the proposed Ballard to West Seattle light rail line, which will move through the maritime trade, commercial fishing and manufacturing spine of the region. It will traverse two Manufacturing Industrial Centers (MICs), run adjacent to the homeport of the North Pacific Commercial Fishing Fleet, as well as the Port of Seattle's container terminal facilities. We appreciate the need to provide more efficient and equitable transportation options in our growing region, including along the Ballard to West Seattle corridor. With that said, great care must be given to minimize short-and-long-term disruptions to maritime activity in the area. Many of these operations are water dependent and cannot relocate elsewhere in our region.

Based on the information presented in the DEIS, we support the following:

#### Interbay/Ballard Segment

SMBC supports modifying Sound Transit's current preferred alternative to identify a tunnel alternative as the preferred alternative moving forward. Between the tunnel alternatives, we support the Preferred Tunnel 15<sup>th</sup> Avenue Station Option (IBB-2b) as the preferred alternative.

The DEIS details that the current Preferred Elevated 14<sup>th</sup> Avenue Alternative is now estimated to cost as much as \$1.6 billion, bringing it within the range of the two preferred tunnel alternatives. This makes it ever more difficult to justify support of elevated alternatives that would have significantly more impact on the surrounding community than a tunnel alternative. This includes disruption and displacement of maritime businesses located on Salmon Bay that will find it difficult if not impossible to relocate and interference with marine traffic on the Lake Washington Ship Canal essential our region's economy. The February 2022 determination by the United States Coast Guard on the navigation impediments that would be caused by the elevated alternatives for the Ship Canal should be cause enough for Sound Transit to modify its preferred alternative to a tunnel alternative.

Importantly, development of the Interbay/Ballard segment must preserve today's freight and transportation capacity on 15<sup>th</sup> Avenue and connecting freight routes through Ballard and Interbay, which serves as a critical lifeline for the City's manufacturing and industrial sector. The Ballard-Interbay MIC is an important urban industrial center with a diverse mix of businesses. It includes some of the city's most productive working waterfront, wharfs, shipyards, railyards, manufacturing and industrial businesses, and the Port of Seattle's Fisherman's Terminal and Terminals 90 and 91. Integration of the Interbay/Ballard segment along this corridor must maintain existing freight and transportation capacity essential to these businesses and facilities.

#### SODO Segment

More analysis is needed in the Final EIS to fully assess the impacts to freight mobility and account for growth at port container terminals. There is limited information about the impact rail has on freight mobility, limited analysis of day-time traffic impacts when freight is at peak use, and no cumulative effects analysis of the impacts on the interconnected Ballard-Interbay MIC and Greater Duwamish MIC.

#### Duwamish Segment

We oppose the North Crossing Alternative (DUW-2) as the preferred alternative for the Duwamish Segment. This alternative stands to have significant and lasting impacts on the port, marine, and industrial facilities located along the North Crossing route. This includes the Northwest Seaport Alliance's recently improved facilities at Terminal 5 and Terminal 18 and the surrounding network of maritime and industrial facilities that are waterfront dependent and impossible to relocate from their existing locations.

While a south crossing of the Duwamish is strongly preferable, both the Preferred South Crossing Alternative (DUW-1a) and the South Edge Crossing Option (DUW-1b) have impacts that should be further evaluated and addressed as design of a south crossing progresses. This includes impacts to BNSF facilities, marine facilities, in-water columns, and the West Duwamish Greenbelt. We strongly urge more attention be paid to this section and all possible design modifications pursued to minimize or mitigate these impacts.

Thank you for the opportunity to comment on the DEIS. We welcome the opportunity to continue to engage in this process, particularly in the effort to further study the impacts of this latest link extension on the ability of the maritime industry to continue to create jobs and opportunities for businesses and workers across Seattle and our region.

Sincerely,



Peter Tarabochia  
Board President  
Seattle Marine Business Coalition  
[seattlemarinebusinesscoalition.org](http://seattlemarinebusinesscoalition.org)



April 28, 2022

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

Sent via email to [WSBLEDEIScomments@soundtransit.org](mailto:WSBLEDEIScomments@soundtransit.org)

Dear Ms. Swift,

On behalf of the Seattle Metropolitan Chamber of Commerce and our 2,500 members, I am submitting comments on the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (DEIS). The Chamber has been a long-time champion of the regional expansion of light rail and the opportunity that light rail will bring to the northwest and southwest neighborhoods of Seattle, connecting these communities and everyone in between to the broader light rail system and network.

We appreciate the information presented in the DEIS and the effort by the agency staff to make the document available to the public, present the results to community organizations, and answer questions from affected property owners. This proposed project represents a 100-year decision for the City of Seattle and Puget Sound region. It will take careful consideration by the Sound Transit Board of Directors to select the best alignment and station locations and ensure the health and vitality of the adjacent communities during the more than 11 years of construction.

### **Locally Preferred Alternative**

Based on the information presented in the DEIS, the Chamber believes the locally preferred alternative should include all stations approved by voters and be confirmed or modified to include the following:

#### Interbay/Ballard Segment

The Ballard Link Extension must preserve today's capacity on 15<sup>th</sup> Avenue West and in the Ballard neighborhood, both of which support the City's manufacturing and industrial sector. The Ballard-Interbay Manufacturing Industrial Center is an important urban industrial center with a diverse mix of businesses. It includes some of the city's most productive working waterfront, wharfs, shipyards, railyards, manufacturing and industrial businesses, and the Port of Seattle's Fisherman's Terminal and Terminals 90 and 91. It is also part of the interconnected manufacturing and industrial sector including the Greater Duwamish Manufacturing Industrial Center.

As described in the DEIS, the Preferred Elevated 14<sup>th</sup> Avenue Alternative (IBB-1a) is now estimated to cost as much as \$1.6 billion, bringing it within the range of the two preferred tunnel alternatives. The elevated alternative would have significantly more adverse impacts on the surrounding area, including maritime businesses located in Salmon Bay that will find it difficult if not impossible to

relocate. Therefore, Sound Transit should modify the preferred alternative to identify the Preferred Tunnel 15<sup>th</sup> Avenue Station Option (IBB-2b) as the preferred alternative.

While the Tunnel 14<sup>th</sup> Alternative (IBB-2a) is closer in cost to the Preferred Elevated 14<sup>th</sup> Alternative (IBB-1a), it is preferable to have the station on 15<sup>th</sup> Avenue Northwest, closer to the heart of the Ballard neighborhood where new housing is being constructed and more is planned. Additional design work on this alternative may present opportunities for cost savings, similar to the cost savings recently identified by Sound Transit for the Tunnel 14<sup>th</sup> Alternative.

The Preferred Tunnel 15<sup>th</sup> Station Option connects to an Interbay Station north of West Dravus Street, between 17<sup>th</sup> Avenue West and Thorndyke Avenue West. This station location and alignment along the west side of the BNSF tracks is preferable to the other options, which would degrade freight operations on 15<sup>th</sup> Avenue West.

### South Interbay Segment

There are several major destinations and employment centers that need high-quality access to the station in the South Interbay Segment, including the Expedia Group and its commercial waterfront campus on Elliott Avenue, a re-developed Armory site, and the Port of Seattle's cruise terminals. Based on the information presented in the DEIS, the Chamber does not believe Sound Transit should identify a preferred alternative in the South Interbay Segment. Sound Transit's Preferred Galer Street Station/Central Interbay (SIB-1) would take capacity from Elliott Avenue West, harming the Ballard-Interbay Manufacturing Industrial Center. It does not provide a direct connection to the more than 4,000 employees at the Expedia Group campus compared to the alternative station locations near West Prospect Street. However, the City of Seattle and Sound Transit have noted the permitting and constructability challenges of the proposed stations near West Prospect Street due to the steep slope on the west side of Queen Anne.

Sound Transit should develop new alternatives or refine the existing alternatives in this segment to provide better connections to the major destinations and employment centers and avoid or minimize impacts on Elliott Avenue West and the Queen Anne hillside. The City of Seattle must be an active partner with Sound Transit to resolve the future of the Magnolia Bridge and the potential replacement alternatives to allow for Sound Transit to develop a South Interbay station and alignment alternative that serves this area for the next 100 years.

### Downtown Segment

Downtown Seattle is the largest employment center for the Puget Sound region and enjoyed some of the highest transit ridership in the United States prior to the pandemic. The design and construction of a second light rail tunnel and the five stations in this segment should encourage transit ridership through high-quality station design and by avoiding or mitigating significant disruptions to transit ridership and adjacent businesses and organizations during construction.

Sound Transit should confirm the Preferred 5<sup>th</sup> Avenue/Harrison Street (DT-1) with the changes described below. The DT-1 alternative provides the best connections to transit routes, major employment centers, and existing light rail. However, we have several concerns with certain elements of the alternative, which should be addressed through design changes and/or mitigation. These include:

- Seattle Center Station. The location of the station on Republican Street between Warren Avenue and First Avenue presents untenable impacts on the resident organizations at the Seattle Center and has significant impacts on the open space and other amenities on the Seattle Center grounds. We urge Sound Transit to work with the City of Seattle and Seattle Center organizations to identify another location for the station that provides access to the light rail system while minimizing impacts on the current tenants and facilities.
- South Lake Union Station. This is a critical station with high ridership that will provide an important transfer point to north-south transit routes, which makes it preferable to the alternative station location on Mercer Street. More work is needed to develop construction approaches and mitigation plans that maintain neighborhood access and circulation for all modes and promotes high-quality station access when construction is complete.
- Denny Station. The DEIS identifies as many as four years of full road closures on Westlake Avenue, disrupting a major transit route that includes the Seattle Streetcar. This location is where the downtown street grid shifts direction, precluding nearby detour routes. Closing Westlake and disrupting transit ridership for this length of time is in effect a permanent impact. The surrounding brick and mortar businesses may not survive as a result of reduced pedestrian volumes, and it should not be assumed transit riders will return after using different alternatives for so long.

Therefore, we urge Sound Transit to explore the possibility of moving the Denny Station location to Terry Avenue, like the location identified in the 6<sup>th</sup> Avenue/Mercer Street Alternative (DT-2). This station location largely limits the impacts to Terry Avenue, an underutilized street with no transit routes.

- Westlake and Midtown Stations. The unique topography of downtown Seattle plus high-rises with deep parking garages and tiebacks, a web of public and private utilities, and the existing light rail and BNSF tunnels present engineering challenges for constructing the stations. This has resulted in stations at Westlake and Midtown that may be as deep as 205 feet, depending on the station location in Chinatown-International District. We urge Sound Transit to consult with outside experts on ways to address these unique challenges. We are building a 100-year system that must be designed for the best possible user experience.

#### Chinatown-International District Segment

The DEIS does not identify a preferred alternative in this segment. The alternatives included in the DEIS are in both the Chinatown-International District and Pioneer Square Historic District, which are unique neighborhoods in the downtown Seattle community.

The Chinatown-International District has suffered significant harm from racist practices and policies, and major infrastructure projects that have been constructed without sufficient mitigation or community benefit. The Pioneer Square Historic District has been negatively impacted by major infrastructure projects over the last 20 years and is home to essential social service providers. Both neighborhoods have suffered disproportionately during the COVID-19 pandemic due to a lack of public safety, small business closures, and increased racism and violence against Asians.

Sound Transit and the City of Seattle have the responsibility to address past harms by identifying ways that the new proposed light rail station can provide benefits to both communities and co-creating a mitigation and community development approach with the community.

The Chamber believes there is not enough information in the DEIS to select a preferred alternative in this segment. The information presented does support eliminating the 4<sup>th</sup> Avenue Deep Station Option (CID-1b) and the 5<sup>th</sup> Avenue Deep Station Option (CID-2b) for the following reasons:

- The Fourth Avenue Deep Station Option (CID-1b) would require the permanent closure of King County Metro's Ryerson Bus Base, a regional facility. This impact cannot be mitigated and would add significant project costs to find a suitable facility elsewhere.
- Both deep station options are at depths of 190 feet, which means access can only be via elevator. Transfers between the new and existing stations could be as much as five minutes, discouraging riders from using the system.

Eliminating these two alternatives will allow the community, Sound Transit, and the City of Seattle to focus on fewer alternatives and develop adequate information to select a preferred alternative. Ultimately, the Chamber believes the Chinatown–International District and Pioneer Square Historic District neighborhoods should recommend the preferred alternative to Sound Transit.

Whichever alternative is selected, Sound Transit and the City of Seattle must develop a robust and unprecedented program to reduce cultural displacement in this station area during and after construction. Where displacement does occur, there should be opportunities for the community to realize housing, business and economic opportunity, and cultural and community services to ensure the existing community can receive the benefits of the new infrastructure improvements.

### SODO Segment

The SODO neighborhood is an essential part of the City of Seattle's manufacturing and industrial sector. The preferred alignment and station location in this segment should enhance and support this sector. Sound Transit should modify the preferred alternative by selecting the At Grade South Station Option (SODO-1b) as the preferred alternative. This alternative moves the new and existing SODO stations closer to Lander Street, which is the most direct connection to the Starbucks Center on First Avenue and the Seattle School District offices on Fourth Avenue South, both major SODO employment centers.

The Chamber recognizes this alternative will impact property owned by the United States Postal Service at Fourth Avenue South and South Lander Street. Sound Transit should work proactively with the federal government to identify ways to avoid or mitigate this impact in order to avoid the time and cost to relocate the facility.

More analysis is needed in the Final EIS to fully assess the impacts of any chosen alternative on the SODO freight network so appropriate mitigation plans can be developed during and after construction. For example, currently there is insufficient information about how relocating bus service and the bicycle path to Fourth and Sixth avenues as well as how light rail and the proposed overpasses at Lander and Holgate will impact freight mobility. There is also limited analysis of day-time traffic impacts when freight is at peak use, and no cumulative effects analysis of the impacts on

service to downtown, freeway systems, and connections to the Ballard-Interbay Manufacturing Industrial and Greater Duwamish Manufacturing Industrial centers.

The project must also consider the City of Seattle's Industrial and Maritime Strategy and pursue transit-oriented development consistent with existing zoning.

### Duwamish Segment

Forty percent of jobs in Washington state are connected to trade. The Duwamish segment is the heart of the Pacific Northwest's international trade with the Northwest Seaport Alliance's recently improved facilities at Terminal 5 and Terminal 18. The terminals are supported by a surrounding network of maritime and industrial facilities, as well as a thriving maritime industry that is impossible to relocate. For these reasons, the Chamber does not support the North Crossing Alternative (DUW-2) as the preferred alternative because of the significant and lasting impacts on the port, marine, and industrial facilities.

While a south crossing of the Duwamish is preferable, both the Preferred South Crossing Alternative (DUW-1a) and the South Edge Crossing Option (DUW-1b) have impacts that should be addressed as design advances. This includes impacts to BNSF facilities, marine facilities, in-water columns, and the West Duwamish Greenbelt. We strongly urge more attention be paid to this section and all possible design modifications pursued to minimize or mitigate these impacts.

### Delridge Segment

The Delridge community is home to a mix of uses, including a community center, affordable housing, and industry, as well as a watershed that is a city priority for preservation and enhancement. The station location and light rail alignment in this neighborhood must support and enhance the diverse community surrounding it as well as the neighborhoods to the south of Delridge that will access the regional transit system at this location. The Chamber is not recommending a preferred alternative in this section of the alignment, however, there are several important issues that must be addressed by Sound Transit depending on the alternative selected.

Nucor Steel has been part of the West Seattle community since 1905 and provides construction projects throughout the Pacific Northwest with steel products. Two of the DEIS alternatives place a station near SW Andover Street (DEL-5 and DEL-6), which will negatively impact the operations of the Nucor Steel facility. These impacts need to be mitigated if either of these alternatives are selected.

The other DEIS alternatives are located closer to the heart of the Delridge community and present a series of trade-offs between opportunities and impacts. The alternative selected should prioritize well-integrated bus-to-rail transfers to provide reliable transit services to the communities south of Delridge, many of which are transit-dependent. Sound Transit and the City of Seattle must also develop a robust program to address potential displacements during construction and ensure that the transit-oriented development opportunities reflect the community's desires. Finally, there must be appropriate mitigation for any impacts to Longfellow Creek, which is one of two tributaries to the Duwamish River that has spawning salmon present.

### West Seattle Segment

The heart of the West Seattle neighborhood is a designated urban village and home to a thriving mixed-use neighborhood where car ownership is no longer a necessity. The continued vitality of this neighborhood must be enhanced by a well-designed station that minimizes surface disruptions.

The Chamber recommends that Sound Transit designate the Medium Tunnel 41<sup>st</sup> Avenue Station Alternative (WSJ-5) as the preferred alternative, which currently includes a station at Avalon. The design and location of the Avalon station may need to be reconsidered to improve outcomes for the Delridge segment station. This alternative has less of an impact on the residential community along Genesee Avenue West than the Short Tunnel 41<sup>st</sup> Avenue Station Alternative (WSJ-4) and is closest in cost to the current preferred alternatives (WSJ-1 and WSJ-2). Sound Transit should continue to explore opportunities to extend this tunnel to 42<sup>nd</sup> Avenue, closer to the commercial heart of the Alaska Junction neighborhood.

### **Station Design and Access**

In all cases, Sound Transit should seek well-designed stations that embrace density, activity, safety features and easily understood access. A light rail station can be a catalyst for the surrounding community and unlock transit-oriented development opportunities to the highest extent possible. This will encourage more riders by allow people to work and live near light rail. The Chamber encourages Sound Transit to continue to look for opportunities to standardize station design to the extent possible in order to realize efficiencies during construction and possible cost savings.

### **Construction Impacts**

The impacts on downtown during 11+ years of construction of either the Preferred 5<sup>th</sup> Avenue/Harrison Street (DT-1) or 6<sup>th</sup> Avenue/Mercer Street (DT-2) alternatives are unacceptable, and the Chamber does not believe the impacts described in the DEIS can be mitigated. This includes multiple year closures of major downtown streets and paths, disrupting transit, freight, cars, walking, biking, and rolling. These lengthy street closures would be unacceptable in the best economic times, but they are especially impactful as downtown Seattle, the heart of the region's economy, recovers from the COVID-19 pandemic. This project will have lasting benefits to the community, but more work is needed to ensure the communities are there to realize those benefits when construction is complete.

It is not possible to determine if the impacts during construction described in the DEIS can be avoided or how they might be mitigated because there is not an evaluation of different approaches to construction. In Section 2.6.6, Tunnel Light Rail Construction (page 2-87), Sound Transit states "Tunnel and underground station construction may involve tunnel boring (using twin or single tunnel boring machines), cut-and-cover construction, or sequential excavation mining."

However, there is no information in the DEIS that describes the difference in impacts between these construction approaches. For example, there is no analysis of the difference between using a twin versus a single large diameter tunnel boring machine. Each station located along a tunnel alignment has only one identified construction methodology, leaving the public with no information on which to evaluate how a different construction methodology might change impacts at the surface.

Sound Transit should evaluate different construction approaches both for the new transit tunnel under downtown Seattle and all underground stations currently assumed to be constructed using a cut-and-cover approach. This information should be made available before the Final EIS is prepared



so the public can provide input on the trade-offs associated with different construction approaches and better understand the extent of mitigation required. This should also include additional information about construction sequencing and timing of each station along with other concurrent construction activities.

### Mitigation plans

Both Sound Transit and the City of Seattle have stated that additional work is needed to fully develop mitigation plans. The Chamber agrees and requests the agencies prepare information for the public before the Final EIS is prepared to better understand the scope and scale of the mitigation plans and the detailed plans approved by the Board of Directors when they select the project to be built. As the agencies develop these additional plans, the Chamber requests the following impacts be fully addressed:

- Impacts on transit routes during construction. This includes closure of the streetcar for multiple years as well as major transit corridors such as Westlake Avenue, 4<sup>th</sup> Avenue, 4<sup>th</sup> Avenue South, Pike Street, Pine Street, and Madison Street.
- Closures of major streets throughout downtown Seattle. Seattle's downtown street grid presents unique challenges and due to the lack of construction sequencing information in the DEIS, it appears that two of the six north-south streets through downtown will be closed to traffic for multiple years.
- Impacts on businesses of all sizes. The extent of street closures and disruptions to foot traffic throughout downtown Seattle will cause irreparable damage to businesses that are just beginning to recover from the COVID-19 pandemic. In addition, maritime or industrial businesses have limited or no opportunities to relocate their businesses given the scarcity of industrially zoned areas, meaning measures to avoid or mitigate impacts must be developed.
- Impacts on social service providers. Downtown Seattle is home to many of the social service providers in King County, which is facing an ongoing homelessness crisis. Disruptions to transit service and long-term sidewalk closures will discourage people from accessing these essential services.
- Impacts to housing. While increasing transit and transit-oriented-development will ultimately improve Seattle's affordability and accessibility, residential displacements will contribute to the lack of housing and Seattle's housing unaffordability in the near term.

When developing mitigation plans, Sound Transit and the City of Seattle need to go beyond business as usual and traditional practices. Given the length of construction and scale of the impacts described in the DEIS, it is not reasonable to assume that people will return to transit and businesses will re-open once light rail is constructed. Therefore, as arguably the largest infrastructure project to be constructed in Seattle's history, simply posting "businesses are open" signs and providing information about when disruptions will occur should not be considered acceptable or adequate mitigation. In addition, special attention must be paid to the small businesses who are especially impacted by and sensitive to street closures and prolonged disruptions, particularly those located in the Chinatown-International District. These businesses are essential parts of the community's character and cohesion and should not be irreparably harmed by this project.

A recent example of a robust mitigation program is the Alaskan Way Viaduct Replacement Program, which funded a major marketing effort, community-led construction coordinator, and a parking replacement program among other measures.

Ultimately Sound Transit and the City of Seattle should prepare a detailed construction management plan that includes ways to mitigate construction impacts within neighborhoods, avoid impacts to transit, help employers encourage transit ridership, establish requirements for maintaining access during construction, create a proactive and real-time communication plan, create and promote marketing and public education, open storefront offices to share information, and designate freight routes.

### **Community Development**

The DEIS recognizes the unique characteristics of both the Chinatown-International District and Delridge communities, including high percentages of minority and low-income populations as well as social service agencies that provide essential community services. This recognition should lead Sound Transit and the City of Seattle to not only adequately mitigate project impacts but go beyond by providing additional investments and support that ensure these communities and neighborhoods are well positioned to realize the opportunities and benefits presented by this project.

Sound Transit and the City of Seattle both recognized a similar situation existed in the Rainer Valley when the first light rail line was constructed and established the Rainier Community Development Fund. This \$50 million transit-oriented community development fund was used to fund physical and economic improvements in the Central Link light rail corridor. Another recent example is the expansion of the Washington State Convention Center, which invested nearly \$94 million in community projects, including affordable housing, open space, arts, historic building enhancements, bicycle master plan funding, and improvements in the right-of-way.

The Chamber encourages both agencies to build on these two examples and take a similar approach for realizing community benefits in the Chinatown-International District and Delridge neighborhoods. Other elements that should be part of any community development program include engaging youth in planning and design; collaborating with community organizations to “cast” the uses around the stations for the community’s benefit; and engaging with Indigenous communities.

For the Chinatown-International District and Pioneer square neighborhoods, the Chamber encourages Sound Transit and the City of Seattle to partner and invest in the “Jackson Hub” concept to improve the station area, which is both a multi-modal and cultural hub. This includes seeking private and public partnerships to reimagine Union Station as a vibrant community asset where businesses and community members have a stake in the plan and implementation.

### **Project Costs and Funding**

Extending light rail to the northwest and southwest neighborhoods in Seattle will realize long-standing community desires for more reliable transit service and create community development opportunities. Decisions about the project scope, impacts, mitigation, and community development programs should be viewed in this context so that the best long-term decision is made for the community and the overall system.

As described in the DEIS, the cost differences between Sound Transit’s preferred alternatives and other preferred alternatives identified as needing third-party funding is greatly reduced or eliminated

(i.e., Interbay/Ballard segment). This evolution in cost estimates is reflective of additional information about permitting, property acquisition, and design. Based on this trend, it is reasonable to assume that additional design could result in further cost refinements.

The Chamber urges Sound Transit to modify or confirm the preferred alternative based on what is best for the community and the regional system, not on today's estimated costs based on an early stage of design. More work is needed on design, alternative construction approaches, and mitigation as well as exploring all options to improve the agency's financial capacity, reduce project affordability gaps, and deliver projects in a timely manner as called for in Board Resolution R2021-05. This includes convening a technical advisory group that will advise the board on ways to accelerate project delivery and address known challenges that can increase project costs.

The Chamber also urges Sound Transit to explore all innovative approaches to project delivery, including co-development of stations and station entrances with the private sector. Utilizing public-private partnership approaches will create opportunities to address both project costs and schedule and better integrate the project into the community.

### Conclusion

We appreciate the work of Sound Transit to prepare the DEIS and engage with the community during the public comment period to communicate the analysis and results in the document. The Seattle Metropolitan Chamber of Commerce will continue to work with both Sound Transit and the City of Seattle to ensure this project results in a high-quality transit service that serves the people of Seattle and the Sound Transit district for the next 100 years.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel Smith". The signature is fluid and cursive, with the first name "Rachel" being more prominent than the last name "Smith".

Rachel Smith  
President & CEO



April 28, 2022

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

Sent via email to [WSBLEDEIScomments@soundtransit.org](mailto:WSBLEDEIScomments@soundtransit.org)

Dear Ms. Swift,

On behalf of the Washington Maritime Federation (WMF) we are submitting comments on the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (DEIS). WMF is an industry-led statewide association representing the diverse maritime interests across Washington State.

Collectively, the maritime industry, including the members of WMF provides more than 60,000 direct, good-paying jobs and over \$38 billion in economic impacts to our state annually. Thousands of these jobs and billions of dollars of economic impact from our industry are generated along the proposed Ballard to West Seattle light rail line, which will move through the maritime trade, commercial fishing and manufacturing spine of the region. It will traverse two Manufacturing Industrial Centers (MICs), run adjacent to the homeport of the North Pacific Commercial Fishing Fleet, as well as the Port of Seattle's container terminal facilities. We appreciate the need to provide more efficient and equitable transportation options in our growing region, including along the Ballard to West Seattle corridor. With that said, great care must be given to minimize short-and-long-term disruptions to maritime activity in the area. Many of these operations are water dependent and cannot relocate elsewhere in our region.

Based on the information presented in the DEIS, WMF supports the following:

#### SODO Segment

More analysis is needed in the Final EIS to fully assess the impacts to freight mobility and account for growth at port container terminals. There is limited information about the impact rail has on freight mobility, limited analysis of day-time traffic impacts when freight is at peak use, and no cumulative effects analysis of the impacts on the interconnected Ballard-Interbay MIC and Greater Duwamish MIC

#### Duwamish Segment

We oppose the North Crossing Alternative (DUW-2) as the preferred alternative for the Duwamish Segment. This alternative stands to have significant and lasting impacts on the port, marine, and industrial facilities located along the North Crossing route. This includes the Northwest Seaport Alliance's recently improved facilities at Terminal 5 and Terminal 18 and the surrounding network of maritime and industrial facilities that are waterfront dependent and impossible to relocate from their existing locations.



While a south crossing of the Duwamish is strongly preferable, both the Preferred South Crossing Alternative (DUW-1a) and the South Edge Crossing Option (DUW-1b) have impacts that should be further evaluated and addressed as design of a south crossing progresses. This includes impacts to BNSF facilities, marine facilities, in-water columns, and the West Duwamish Greenbelt. We strongly urge more attention be paid to this section and all possible design modifications pursued to minimize or mitigate these impacts.

#### Interbay/Ballard Segment

WMF supports modifying Sound Transit's current preferred alternative to identify a tunnel alternative as the preferred alternative moving forward. Between the tunnel alternatives, we support the Preferred Tunnel 15<sup>th</sup> Avenue Station Option (IBB-2b) as the preferred alternative.

The DEIS details that the current Preferred Elevated 14<sup>th</sup> Avenue Alternative is now estimated to cost as much as \$1.6 billion, bringing it within the range of the two preferred tunnel alternatives. This makes it ever more difficult to justify support of elevated alternatives that would have significantly more impacts on the surrounding community than a tunnel alternative. This includes disruption and displacement of maritime businesses located on Salmon Bay that will find it difficult if not impossible to relocate and interference with marine traffic on the Lake Washington Ship Canal essential our region's economy. The February 2022 determination by the United States Coast Guard on the navigation impediments that would be caused by the elevated alternatives for the Ship Canal should be cause enough for Sound Transit to modify its preferred alternative to a tunnel alternative.

Importantly, development of the Interbay/Ballard segment must preserve today's freight and transportation capacity on 15<sup>th</sup> Avenue and connecting freight routes through Ballard and Interbay, which serves as a critical lifeline for the City's manufacturing and industrial sector. The Ballard-Interbay MIC is an important urban industrial center with a diverse mix of businesses. It includes some of the city's most productive working waterfront, wharfs, shipyards, railyards, manufacturing and industrial businesses, and the Port of Seattle's Fisherman's Terminal and Terminals 90 and 91. Integration of the Interbay/Ballard segment along this corridor must maintain existing freight and transportation capacity essential to these businesses and facilities.

Thank you for the opportunity to comment on the DEIS. We welcome the opportunity to continue to engage in this process, particularly in the effort to further study the impacts of this latest link extension on the ability of the maritime industry to continue to create jobs and opportunities for businesses and workers across our state and the Pacific Northwest.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. See".

Chad See  
Board President  
Washington Maritime Federation  
206-284-2522 | [chadsee@freezerlongline.biz](mailto:chadsee@freezerlongline.biz)