



April 28, 2022

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

Sent via email to WSBLEDEIScomments@soundtransit.org

Dear Ms. Swift,

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 15th 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 14th 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 15th Avenue Station Option (IBB-2b) as the preferred alternative.

While the Tunnel 14th Alternative (IBB-2a) is closer in cost to the Preferred Elevated 14th Alternative (IBB-1a), it is preferable to have the station on 15th 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 14th Alternative.

The Preferred Tunnel 15th Station Option connects to an Interbay Station north of West Dravus Street, between 17th 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 15th 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 5th 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 6th 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 4th Avenue Deep Station Option (CID-1b) and the 5th 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 41st 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 41st 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 42nd 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 5th Avenue/Harrison Street (DT-1) or 6th 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, 4th Avenue, 4th 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