

**Appendix O.2.3**  
**Businesses and Business Organizations**

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Businesses and business organizations that provided comments include:

- 2700 4th Avenue South Limited Partnership
- 3450 4th Avenue South
- 6th Avenue South Property LLC
- Alaskan Copper
- Alki Beach Academy
- Alki Lumber
- American Waterway Operators
- BladeGallery
- BNSF
- Development Services of America
- Delridge Development LLC
- Esquin
- HB Management
- ILWU Local 19
- Main Street Equity Partners
- Maris Apartments
- McCullough Hill Leary
- NAIOP-Commercial Real Estate Development Association
- Nucor Steel
- Pacific Iron and Metal Company
- Pacific Merchant Shipping Association
- Seattle Marine Business Coalition
- Seattle Metropolitan Chamber of Commerce
- SODO BIA
- SSA Marine
- The Grove West Seattle
- The Whittaker
- United Motor Freight/Riverside Mill
- Washington Maritime Federation
- West Seattle Chamber of Commerce
- West Seattle Junction Association

For businesses or business organizations that submitted more than one submittal, the submittals are presented in the order received.

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April 28, 2022

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

Sent by Email: [WSBLEDEIScomments@soundtransit.org](mailto:WSBLEDEIScomments@soundtransit.org)

RE: WSBLE Draft Environmental Impact Statement

Dear Sound Transit,

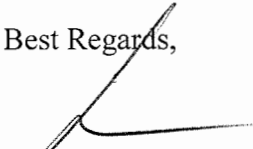
We write this letter representing 2700 4<sup>th</sup> Ave South, Limited Partnership, the owner of the real property located at 2700 4<sup>th</sup> Avenue South, Seattle WA 98134. The purpose of this letter is to provide comments on the Sound Transit West Seattle to Ballard Link Extension (WSBLE) Draft Environmental Impact Statement (DEIS). Our comments focus on the SODO segment, as our property is located in the SODO neighborhood and lies immediately adjacent to the planned light rail station development. We have significant concerns about the information released in the WSBLE DEIS.

Our property, which is home for more than ten active businesses including both retail and office tenants, some of whom have been established for more than twenty years, has been indicated in the DEIS for taking by Sound Transit to be used as staging area and possibly for use for installation of utility vaults. It is also indicated as an area for potential future station oriented redevelopment. We are very concerned that the long construction period, along with the roadway overpass being contemplated on South Lander Street, will negatively affect the sustainability of these businesses and the property's value overall. No detailed information has been provided regarding these effects on this and other adjacent properties in the DEIS.

In summary, the DEIS lacks important data and information which impacts stakeholders' ability to adequately comment on the project, impacts, and mitigation at time.

Thank you for your attention to this very important matter.

Best Regards,



Henry G. Liebman  
General Partner  
2700 4<sup>th</sup> Ave South, LP

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504765 - 2700 4th Ave South, Limited Partnership Draft EIS Comment**

#	Comments	Responses
1	<p>Our property, which is home for more than ten active businesses including both retail and office tenants, some of whom have been established for more than twenty years, has been indicated in the DEIS for taking by Sound Transit to be used as staging area and possibly for use for installation of utility vaults. It is also indicated as an area for potential future station oriented redevelopment.</p> <p>We are very concerned that the long construction period, along with the roadway overpass being contemplated on South Lander Street, will negatively affect the sustainability of these businesses and the property's value overall. No detailed information has been provided regarding these effects on this and other adjacent properties in the DEIS. In summary, the DEIS lacks important data and information which impacts stakeholders' ability to adequately comment on the project, impacts, and mitigation at time.</p>	<p>Please see responses to CCG1 and CC4.1a in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. In developing alternatives, Sound Transit avoids and minimizes impacts where possible, but some displacement would be unavoidable. Sound Transit will work closely with each displaced business to determine its needs and help it find a new site if the owner chooses to relocate. Section 4.1, Acquisitions, Displacements, and Relocations, of the Final EIS provides information on property acquisition and relocation processes and the relocation assistance and benefits that Sound Transit will provide. Information about affected properties is provided in Appendix L4.1, and includes the properties noted in the comment. Please see Section 2.6, Construction Approach, for more information on construction methods and durations. See Section 3.11, Construction Impacts, of the Final EIS for more information on construction impacts from roadway closures. See Appendix J, Conceptual Design Drawings, for more information on property-specific impacts.</p>

## Sound Transit Projects - Communications (1 Total)

**Search Term**

504907

**Communication ID: 504907 - Andy Pletz Draft EIS Comment**

**Communication** ( 4/28/2022 )

Andy Pletz Draft EIS Comment

Lora,

Please include the following comments for Sound Transit's Draft EIS.

As owners of the building located at 3450 NE 4th Ave. South, Seattle, WA, we'd like to provide our comments regarding the three alternatives of the West Seattle link (DUW-1a, DUW 1b and DUW-2) that would impact us and our tenant.

DUW-1a and DUW-1b

This option:

- would result in a loss of tenant employee and client parking.
- make the functioning and necessary loading dock unusable.
- potentially block egress and ingress during construction.
- disrupt the tenant's business with construction chaos.

Note: We've had previous experience with some of the problems above when the Spokane Steet viaduct expansion was built. One third of our parking was unusable and caused logistical parking problems and challenges accessing our building.

DUW-2

This option:

- would be our preferred choice
- would provide less interruption for the tenant (vs option 1a and 1b)

On paper, the preferred plan DUW-1a and the alternative aerial plan DUW-1b, look good but the reality of the situation is that doing demolition work on or adjacent to an existing property will cause severe damage to the existing building, and as experienced before with the Spokane Street viaduct expansion, sewer and storm drains were damaged causing flooding and sewage backup into the building, parking lots and streets had to be dug up to repair these issues.

It was a very disruptive problem and very stressful to deal with. In all scenarios it appears that the adjacent properties will be taken down and that alone will be very difficult to try and maintain normal business practices throughout the process. Streets will be closed off. Access to the property will be difficult at best. The adjacent properties butt right up against our building so tearing down those walls will impact our property during this process. Who knows what kind of structural damage will happen along the way? The noise and vibration from the demolition will be unbearable. Asking a business to try and maintain normal operations during all this is just not a good option.

We appreciate the opportunity to have our comments heard and hope the board will strongly consider the impact to businesses in the area.

Sincerely,

Dave Brzusek

Andy Pletz

**Owner(s):**

Contact ID	Name	Type	Phones	Email
1050426	Andy Pletz	Individual	+1 (425) 747-8202 (Cell)	AndyPletz@mac.com

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504907 – 3450 4th Avenue South, Andy Pletz Draft EIS Comment**

#	Comments	Responses
1	<p>DUW-1a and DUW-1b This option: • would result in a loss of tenant employee and client parking. • make the functioning and necessary loading dock unusable. • potentially block egress and ingress during construction. • disrupt the tenant’s business with construction chaos. Note: We’ve had previous experience with some of the problems above when the Spokane Steet viaduct expansion was built. One third of our parking was unusable and caused logistical parking problems and challenges accessing our building. DUW-2 This option: • would be our preferred choice • would provide less interruption for the tenant (vs option 1a and 1b) On paper, the preferred plan DUW-1a and the alternative aerial plan DUW-1b, look good but the reality of the situation is that doing demolition work on or adjacent to an existing property will cause severe damage to the existing building, and as experienced before with the Spokane Street viaduct expansion, sewer and storm drains were damaged causing flooding and sewage backup into the building, parking lots and streets had to be dug up to repair these issues. It was a very disruptive problem and very stressful to deal with. In all scenarios it appears that the adjacent properties will be taken down and that alone will be very difficult to try and maintain normal business practices throughout the process.</p> <p>Streets will be closed off. Access to the property will be difficult at best. The adjacent properties butt right up against our building so tearing down those walls will impact our property during this process. Who knows what kind of structural damage will happen along the way? The noise and vibration from the demolition will be unbearable. Asking a business to try and maintain normal operations during all this is just not a good option.</p>	<p>Please see response to CCG2 in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Please see Section 4.3, Economics, of the Final EIS for more information on impacts to businesses during construction and proposed mitigation.</p>



## Sound Transit Projects - Communications (1 Total)

**Search Term**

504913

**Communication ID: 504913 - Dave Brzusek Draft EIS Comment**

**Communication** ( 4/28/2022 )

Dave Brzusek Draft EIS Comment

As owners of the building located at 3450 NE 4th Ave. South, Seattle, WA, we'd like to provide our comments regarding the three alternatives of the West Seattle link (DUW-1a, DUW 1b and DUW-2) that would impact us and our tenant.

DUW-1a and DUW-1b

This option:

- would result in a loss of tenant employee and client parking.
- make the functioning and necessary loading dock unusable.
- potentially block egress and ingress during construction.
- disrupt the tenant's business with construction chaos.

Note: We've had previous experience with some of the problems above when the Spokane Steet viaduct expansion was built. One third of our parking was unusable and caused logistical parking problems and challenges accessing our building.

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This option:

- would be our preferred choice
- would provide less interruption for the tenant (vs option 1a and 1b)

On paper, the preferred plan DUW-1a and the alternative aerial plan DUW-1b, look good but the reality of the situation is that doing demolition work on or adjacent to an existing property will cause severe damage to the existing building, and as experienced before with the Spokane Street viaduct expansion, sewer and storm drains were damaged causing flooding and sewage backup into the building, parking lots and streets had to be dug up to repair these issues.

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We appreciate the opportunity to have our comments heard and hope the board will strongly consider the impact to businesses in the area.

Sincerely,

Dave Brzusek  
Andy Pletz

**Owner(s):**

Contact ID	Name	Type	Phones	Email
<a href="#">1075065</a>	<a href="#">Dave Brzusek</a>	Individual	+1 (206) 618-5720	<a href="mailto:Daveb@jecustom.com">Daveb@jecustom.com</a>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504913 - 3450 4th Avenue South, Dave Brzusek Draft EIS Comment**

#	Comments	Responses
1	<p>As owners of the building located at 3450 NE 4th Ave. South, Seattle, WA, we'd like to provide our comments regarding the three alternatives of the West Seattle link (DUW-1a, DUW 1b and DUW-2) that would impact us and our tenant. DUW-1a and DUW-1b This option: • would result in a loss of tenant employee and client parking. • make the functioning and necessary loading dock unusable. • potentially block egress and ingress during construction. • disrupt the tenant's business with construction chaos. Note: We've had previous experience with some of the problems above when the Spokane Steet viaduct expansion was built. One third of our parking was unusable and caused logistical parking problems and challenges accessing our building. DUW-2 This option: • would be our preferred choice • would provide less interruption for the tenant (vs option 1a and 1b) On paper, the preferred plan DUW-1a and the alternative aerial plan DUW-1b, look good but the reality of the situation is that doing demolition work on or adjacent to an existing property will cause severe damage to the existing building, and as experienced before with the Spokane Street viaduct expansion, sewer and storm drains were damaged causing flooding and sewage backup into the building, parking lots and streets had to be dug up to repair these issues. It was a very disruptive problem and very stressful to deal with. In all scenarios it appears that the adjacent properties will be taken down and that alone will be very difficult to try and maintain normal business practices throughout the process. Streets will be closed off. Access to the property will be difficult at best. The adjacent properties butt right up against our building so tearing down those walls will impact our property during this process. Who knows what kind of structural damage will happen along the way? The noise and vibration from the demolition will be unbearable. Asking a business to try and maintain normal operations during all this is just not a good option.</p>	<p>Please see response to CCG2 in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Please see Section 4.3, Economics, of the Final EIS for more information on impacts to businesses during construction and proposed mitigation.</p>

April 27, 2022

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

Re: Sixth Avenue South Property LLC comment letter -- Puget Sound Regional Transit Authority (Sound Transit) West Seattle and Ballard Link Extensions Draft EIS--Sound Transit ROW I.D. WS5712 (2901 6th Ave. S.)

To Whom It May Concern:

We represent the Sixth Avenue South Property LLC (“6<sup>th</sup> Ave” or “the LLC”) the owner of the property at 2901 6<sup>th</sup> Ave. S. I am writing regarding Sound Transit’s proposed “flyover” through the south parking lot at 2901 6<sup>th</sup> Ave. S. (“the facility” or “the operation”). It is our understanding that Sound Transit is looking at 3 configurations for the proposed flyover, identified in Ch. 4 of Appendix L to the DEIS as DUW-1a (see Figure L4.1-4a on p.74/266 of App. L, Ch. 4), Option DUW-1b (Fig. L4-1-5a, p. 84/266), and Alternative DUW-2 (L4.1-6a, p. 94/266). Furthermore, the primary access to the operation – 6<sup>th</sup> Avenue – will be closed on nights and weekends for an indeterminate time. The impacts caused by Sound Transit’s proposals are unacceptable.

### **SEPA AND CONDEMNATION**

Sound Transit’s plans threaten to condemn the facility. As you know, there is already a flyover just north of the facility in the S. Forest St. right-of-way. Now Sound Transit is proposing to box in the facility by building another flyover immediately to the building’s south through its parking lot. Without an alteration in the design/location of the new, proposed flyover and other mitigation relating to closure of 6<sup>th</sup> Avenue S., the property will suffer punitively. The result of the two separate flyovers virtually abutting the same building is an incredibly anomalous, hugely negative precedent. In fact, it is highly likely that if the flyover is built as planned, the facility will no longer be able to operate as intended. We hope Sound Transit sees these facts like we do and understands their potential implications—the following analysis and information from our experts argue for a better way, a flyover through the S. Hanford Street end.

Also, as you know, the State Environmental Policy Act (“SEPA”) requires environmental review of any project in the state of Washington with certain exemptions. RCW 43.21C. The Puget Sound Regional Transit Authority (“Sound Transit”) is studying a plan to extend light rail to West Seattle and Ballard. No one questions whether the size, scope and/or significance of this project crosses the exemption threshold. In fact, Sound Transit has effectively conceded that the

project will cause probable significant environmental impacts which require evaluation through an environmental impact statement (“EIS”). In acknowledgement of the same, Sound Transit recently published a draft EIS (“DEIS”) calling for public comments no later than April 28, 2022.

Our client is deeply concerned that Sound Transit is—relatively speaking—unaware of the implications of the proposed flyover and street closure to the operation. While there have been numerous public meetings hosted by Sound Transit or others, e.g. SODO BIA, discussing the West Seattle extension, in SODO virtually all of them have focused on station planning. To our knowledge, whatever site-specific environmental review of the propose flyover’s location Sound Transit has done is inadequate.

As will be demonstrated in the following, the operation’s south parking lot is arguably one of the most important crucibles of the food supply chain in the Pacific Northwest. The incredibly complicated logistics required to meet the needs of millions of customers regionally, on a daily basis and confined to the tight quarters of this relatively small parking lot, are mind-boggling. Our client has marshalled information and support from a variety of resources demonstrating that the flyover’s impacts to the operation are incapable of mitigation without relocating the flyover. (As a practical matter, should Sound Transit move forward with the proposal as is, it is inconceivable that—given the likely shut down of the operation during the period of Sound Transit’s temporary construction easement (TCE)—an alternative location can be found by Sound Transit that would allow the operation to keep functioning as is.)

Besides the narrative below, this comment letter attaches or imbeds critical information on significant impacts from, among others, TenW (transportation impacts), Kidder Matthews (valuation impacts), Marcus & Millichap (solicitation), US Bakery dba Franz (lessee impacts), and SODO BIA (SODO impacts). Also, imbedded [HERE](#) is a link to a time-lapsed video (Exhibit A) of approximately 5’ 45” that unequivocally demonstrates and underlines the complexity of this operation’s transportation logistics, all threatened by the flyover.

Accompanying that video—and attached to this comment letter as Exhibit B is a one-page narrative summary of the video to authenticate its provenance and otherwise aid in its review.

All of the impacts discussed in the attached exhibits or imbedded links are significant by themselves, but cumulatively constitute probable significant environmental impacts which Sound Transit cannot adequately mitigate unless the flyover is relocated elsewhere.

## **INTRODUCTION**

The building at 2901 6<sup>th</sup> Ave. S. has continually operated as a bakery since the early 1950s. The bakery property is on approximately 4.09 acres and is mainly occupied by a structure built as a manufacturing bakery in 1952 by American Bakeries. It was acquired by Gai’s Seattle French

Bakery in 1980. In 1997, the facility was leased by the members of the LLC to US Bakery dba Franz.

Franz Bakery is a fourth-generation family business that has provided Pacific Northwest communities with high-quality fresh bread, baked goods and pastries since 1906. The operation generates hundreds of millions of pounds of bakery goods for the entire Pacific Northwest (and beyond).

Naturally, the logistics for operating the bakery, particularly loading/unloading raw materials and product, is extremely complicated. The facility operates 24/7 with approximately 200 truck trips per day through the south parking lot. In fact, the south parking lot not only serves as the load/unload/delivery/staging area for the operation, but parking for 150 employees and visitors/customers of the outlet store there (nearly 4000 visits per month). See generally April 15, 2022 letter from Michael R. Pettit, CFO, United States Bakery dba Franz (attached as Exhibit C). See also letter from Erin Goodman, Executive Director, SODO BIA (attached as Exhibit D).

### **OPERATION DESCRIPTION**

The particular bakery at 2901 6<sup>th</sup> Ave S. manufactures a variety of products on automated bread and bun lines. These lines are specialized equipment and unique to the baking industry. The cost of these lines in equipment alone (so not counting the infrastructure/building and electrical costs associated with power to the building) are estimate at approximately \$36M (\$11M bun line and \$25M high speed bread line). The new bun line was added in 2019. These lines produce over 1.8 million pounds of products a week. As a result, the facility is one of the largest manufacturing plants in the Pacific Northwest. Both production lines are set up scheduling three shifts over approximately 120-152 hours of production a week. The operation runs a 7 day a week production schedule with full capacity in producing 1.2 million pounds a week of bread and 600,000 pounds of a variety of buns.

The operation currently employs over 150 personnel in production, food safety, shipping, receiving, sales and transport. Besides production, the operation requires support from two departments on an on-going basis: (1) the food safety and compliance groups—these departments set up schedules of cleaning equipment, bakery mixers, conveyors, ovens, and lines that enable and meet the food safety requirements set by the federal FDA and internal audit requirements; (2) the engineering group—this department has to set a Preventative Maintenance Program and service equipment based on run times, change over, and ongoing mechanical requirements set by manufacturers' specifications; in addition, the group provides repairs and additions to existing equipment on breakdowns as needed.

## **LOGISTICAL DETAILS**

A major concern of the LLC resulting from the Sound Transit proposal is the impact the flyover and street closure will have on the multi-modal efficiency of this tremendously complicated logistical operation, all confined to the south parking lot. As stated earlier, this bakery location was specifically chosen in 1952 because, even then, it was central to many access points and means of transportation. Of course, now, the site is centrally prominent in giving access to freeways and railways to allow for the transportation of products to the Franz distributions centers and bakeries that Franz operates in multiple states. The bakery's prime location is also a benefit for ingredient deliveries which are critical. Among other issues, the elevation decline from the flyover's supports columns as it wraps around towards the SODO busway could dramatically impact or even halt the ability for BNSF to deliver by railway.

BNSF has rail access for the delivery of bulk flour with five rail cars per week, depending on volume, with each rail car carrying approximately 210,000 lbs. of flour. That delivery depends on the crossing at 6<sup>th</sup> Avenue (see 6<sup>th</sup> Avenue Closure Concerns). The flour is pumped into the two 200,000 pound capacity flour tanks just outside the building, which then flows into the bakery operation inside the building. Franz has to coordinate weekly with a flour mill located in Montana, in conjunction with BNSF, to ensure timely delivery using the rail line that crosses 6<sup>th</sup> Avenue then backs onto the line parallel to the facility. Of course, disruption in service can cause bakery downtime, and delay in product manufacturing. The delivery of flour and rail service enables flexibility in inventory control and market commodity pricing of the main ingredient (flour) for manufacturing.

### **Channels of Distribution:**

**Direct Sales Delivery : ( DSD) – Route Sales** – 45 trucks per week (which include additional personnel, such as drivers and handlers) service the market areas to grocery stores, restaurants, schools, office buildings, hospitals and a variety of customer service accounts in the Pacific Northwest. These trucks include both box trucks and shuttle trucks.

**National Sales:** 55 transport trucks per week load and unload at the bakery, deliver to cold storage facilities and/or accounts that service multiple customers in cased products. Examples of such customers are Food Service America, Sysco, and other major or secondary food manufacturers/distributors. These trucks' trailers are 42-53 feet long (67' total, including cab and hinge) carrying up to 20+ pallets of products weekly to specific customer locations. These trucks are typically involved in delivery of trailers to other transportation systems (e.g. shipping) or directly to locations in Hawaii, Los Angeles and/or Springfield, Oregon.

**Box Store Routes :** Part of DSD, but are typically specialized for delivery to stores of multiple product varieties, e.g. Costco, Walmart, Sam’s Club, stadium facilities, shipyards, and other government contracts , etc.

**Transports/Semi’s :** Franz operates its own fleet of 35 semi-trucks per week which delivers to the distribution centers from this location to numerous Washington locations, e.g. Kent, Tacoma, Parkland, Olympia, Port Angeles, Bremerton, Bellingham, Lynnwood and Everett. The truck configurations (single- or double-trailers, not counting cabs and hinges) are different based on load requirement, but can be from 48-72 feet long. These transports also supply bakery products to the other affiliate bakeries in the Franz system for outside sales, e.g. Portland, Springfield (Oregon), Spokane, Nampa (Idaho), as well as destinations in California and Montana. )

**Outside Vendor Ingredient Deliveries:** Approximately 30 trucks per week arrive at the facility, for purposes of outside vendor packaging, national sales, specialized bakery ingredients, etc. (Monday-Saturday deliveries). The operation gets between 3-8 truck deliveries per day based on supply and demand.

**Feed Commodities:** There are three truck trips per week associated with this activity. The trucks pick up a large dumpster-like container (visible in the first segment of the video whose link is attached as Exhibit A) that is day-old and/or damaged product/stale product that goes to outside use for cattle feed and grain operations.

**Outlet Store Customers:** The operation’s “Outlet Store” is open 6 days a week (sometimes 7 days a week based on demand). Customers use specific marked parking spaces in the south parking lot at the northeast corner. We estimate approximately 130 customer cars per day, or between 700-900 per week depending on demand.

**Mechanic’s Shop on Site:** The operation has a full-service mechanic’s shop that does fleet maintenance to Franz semi-trucks/trailers as well as DSD route sales vehicles. We estimate that the shop services approximately 25 vehicles per week, and provides outside vendors parts and service as needed. This is a critical logistical component of the operation, as its central location (for all of Franz’s PNW operations) enables reduction in service time delays. Also, the mechanics at the shop can travel to distribution centers to service vehicles on a scheduled route. On-going maintenance and emergency service is a critical factor with the shelf-life products the operation manufactures.

**Summary Trucks per week :**  
**Transports Trucks :35**  
**DSD Sales: 45**  
**National Sales : 55**

**Outside Vendors- Supplies: 30**  
**Service Mechanic Trucks: 25**  
**Feed Commodity Trucks: 3**  
**Total : 193**  
**Outlet Store Customers Cars : 780**

### **SOUTH PARKING LOT INFORMATION**

Our engineers, including TenW, have reviewed Sound Transit's plans for the facility's south parking lot. Without knowing exact dimensions of the columns (and elevation), the LLC estimates that it would lose 6-10 parking spaces in main parking lot and along the fence line where the two train tracks meet. It is also possible that the support column could impact the hundreds of tractor/trailer trucks entering and exiting the parking lot. A minimum of 16ft (14ft + 2ft for lighting) of vertical clearance would be required for truck movement through the lot. Hanging lighting for safety is preferred over strapping.

While it is difficult to estimate the time impact on the facility's operation to load and maneuver around the proposed columns, the TenW report analyzes those impacts to the best of our ability. they are not insignificant. Our conclusion is that those impacts are probable, significant and incapable of mitigation absent an adjustment in the flyover's location and modification of the street closure. See TenW report dated April \_\_\_\_\_, 2022 attached as Exhibit E for more detailed analysis.

### **6<sup>th</sup> AVENUE CLOSURE CONCERNS**

As identified in Exhibit E (the TenW report), Sound Transit plans to close 6<sup>th</sup> Ave from S. Forest St. to S. Horton St. for an indeterminate time on nights and weekends. The operation relies on 6<sup>th</sup> Avenue for access; there is no other. Further, as explained earlier, the operation runs 24/7, and as Exhibit A shows, nighttime activity is at least as intense—if not more so—than daytime.

Unless Sound Transit modifies its design per Exhibit E's suggestion to use the S. Hanford St. end for the flyover and/or accommodates the operation's usage of 6<sup>th</sup> Avenue (including the railway crossing, critical to the BNSF flour supply), the operation will essentially be shuttered. Even a short closure of 6<sup>th</sup> Avenue—unless some accommodation is reached—would be disastrous for the operation and the LLC. If Sound Transit is willing to move the flyover to the S. Hanford St. end as depicted in Exhibit E, then it may not be necessary for Sound Transit to close that portion of 6<sup>th</sup> Ave. South from S. Forest St. to the entrance and exit of the operation's south parking lot for the limited purpose of nighttime and weekend operation traffic.

### **VALUATION**



On February 10, 2022, Kidder Mathews (“KM”) provided a “Brokers Opinion of Value” for the subject property (attached as Exhibit F). In that valuation, KM analyzed the property from a cost, income and market approach, based on numerous comparables. KM concluded the property (as distinguished from the operation) is worth at least \$25M, and would price it higher if for sale. Coincidentally, on March 1, 2022, the LLC received an unsolicited expression of interest from Leroy Lutu, Associate Director at Marcus & Millichap (“M&M”), indicating they could produce an offer on the property for between \$36-39M. See March 1, 2022 e-mail from M&M to Donald Gai, one of the LLC members, attached as Exhibit G.

While there may be a debate about the value of the property, there can be no debate that its value will be significantly and detrimentally impacted if the facility cannot operate due to Sound Transit’s construction and/or resulting flyover. Sound Transit’s proposed plans threaten to destroy the value of the property as such, since it cannot/will-not-be-able-to be used as a bakery at least during construction and very possibly afterwards. The economic harm and damage to the LLC under such circumstances is virtually immeasurable.

### **CONCLUSION**

We believe Sound Transit’s plan will force either the shut down or relocation of our operation, either temporarily (at least 3 years) or permanently. (We are skeptical that Sound Transit can provide a temporary relocation site. Even if so, we doubt it will allow a seamless transition.) The economic cost to the LLC will be in the hundreds of millions of dollars, not to mention the crippling effect it will have on the PNW food distribution/supply chain.

We urge Sound Transit to reconsider its plans. By moving the flyover just south of the parking lot to the S. Hanford St. end, the impacts cited above (including from the street closure) likely can be avoided.

Thank you for the courtesy of your consideration. Respectfully,

Sincerely,

PETERSON RUSSELL KELLY LIVENGOOD PLLC



Terrence I. Danysh  
Attorneys for Sixth Avenue South Property LLC

Cc: Sixth Avenue South Property LLC

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504297 - Sixth Avenue South Property LLC Draft EIS Comment**

#	Comments	Responses
1	<p>It is our understanding that Sound Transit is looking at 3 configurations for the proposed flyover, identified in Ch. 4 of Appendix L to the DEIS as DUW-1a (see Figure L4.1-4a on p.74/266 of App. L, Ch. 4), Option DUW-1b (Fig. L4-1-5a, p. 84/266), and Alternative DUW-2 (L4.1-6a, p. 94/266).</p> <p>Furthermore, the primary access to the operation - 6th Avenue - will be closed on nights and weekends for an indeterminate time. The impacts caused by Sound Transit's proposals are unacceptable. SEPA AND CONDEMNATION Sound Transit's plans threaten to condemn the facility. As you know, there is already a flyover just north of the facility in the S. Forest St. right-of-way. Now Sound Transit is proposing to box in the facility by building another flyover immediately to the building's south through its parking lot. Without an alteration in the design/location of the new, proposed flyover and other mitigation relating to closure of 6th Avenue S., the property will suffer punitively. The result of the two separate flyovers virtually abutting the same building is an incredibly anomalous, hugely negative precedent. In fact, it is highly likely that if the flyover is built as planned, the facility will no longer be able to operate as intended. We hope Sound Transit sees these facts like we do and understands their potential implications-the following analysis and information from our experts argue for a better way, a flyover through the S. Hanford Street end.</p>	<p>Following publication of the WSBLE Draft EIS in January 2022, the Sound Transit Board confirmed Alternative DUW-1a as the preferred alternative in the Duwamish Segment in July 2022. Since July 2022, Sound Transit has advanced design of Preferred Alternative DUW-1a, including in the vicinity of 2901 6th Avenue South. Sound Transit appreciates the detailed information about your business operations and the challenges that would be associated with relocating it. Sound Transit has met with representatives of Sixth Avenue South Property LLC to discuss operations at this property and potential impacts. Design modifications to Preferred Alternative DUW-1a since the WSBLE Draft EIS have shifted the connection to the OMF Central to the south within the South Hanford Street right-of-way, reducing impacts to this business operation. These modifications could be applied to Option DUW- 1b if that alternative were selected as the project to be built. Please see Appendix J, Conceptual Design Drawings, for this revised design and the relation to this property.</p>
2	<p>As identified in Exhibit E (the TenW report), Sound Transit plans to close 6th Ave from S. Forest St. to S. Horton St. for an indeterminate time on nights and weekends. The operation relies on 6th Avenue for access; there is no other. Further, as explained earlier, the operation runs 24/7, and as Exhibit A shows, nighttime activity is at least as intense-if not more so- than daytime. Unless Sound Transit modifies its design per Exhibit E's suggestion to use the S. Hanford St. end for the flyover and/or accommodates the operation's usage of 6th Avenue (including the railway crossing, critical to the BNSF flour supply), the operation will essentially be shuttered. Even a short closure of 6th Avenue-unless some accommodation is reached-would be disastrous for the operation and the LLC. If Sound Transit is willing to move the flyover to the S. Hanford St. end as depicted in Exhibit E, then it may not be necessary for Sound Transit to close that portion of 6th Ave. South from S. Forest St. to the entrance and exit of the operation's south parking lot for the limited purpose of nighttime and weekend operation traffic.</p>	<p>Please see response to comment above regarding use of South Hanford Street right-of-way. Information about roadway closures for this updated design is provided in Appendix N.1, Transportation Technical Report.</p>

## **EXHIBIT B**

**April 28, 2022**

### **Franz 6<sup>th</sup> Ave Video Exhibit Summary**

**The following describes key information to aid in the viewing of the Franz 6<sup>th</sup> Ave Video exhibit. The video is 5:45 and covers a time span of approximately 27.5 hours over three different days from three different perspectives.**

#### **CAM 01**

**Date: 2/25/2022 Time: 1 am to 5:59 pm (Video Time = 3 minutes 10 seconds)**

**Area:** Section of video shows parking lot- front area with trucks entering 6<sup>th</sup> Ave and pulling along south end of building by the outlet store to load and unload. It also captures employee parking and activity of trucks that are staged to load and unload. Also shows feed commodity truck staging dumpster for transfer.

#### **CAM 04**

**Date: 2/27/2022 Time: 7:25 am to 5:19 pm (Video time=2 minutes 3 seconds)**

**Area:** Section of video shows the north end of the building and trucks pulling alongside the building to load and unload, and staging. You can also see the loading dock areas, where trucks stage and back in to load and unload for national sales- freezer stock, ingredient loading and unloading of bakery supplies. You can see next to the building four 210,000 lb. BNSF flour railcars that are staged to load flour in the two large flour tanks. You will see trucks backing up to the building, staging trucks, and service trucks pull in and out. You can also see multiple trucks parked that are for servicing or transfer to other distribution centers. Next to the loading docks is the freezer that needs to be accessed to load bakery cases into national sales trailers.

#### **CAM 02**

**Date: 2/18/2022 Time: 1 am to 2:30 am (Video Time=30 seconds)**

**Area:** Section of the video from behind mechanics shop shows the BNSF rail cars using track to pull into rail spurs to move flour rail cars, stage flour rail cars, and place them next to building to start the release of flour or stagger the cars in rotation to use at the bakery facility. The tracks along north side and south side of building are important to provide other BNSF containers to facilitate travel along 5th Ave.

EXHIBIT C



April 15, 2022  
Sound Transit  
401 S. Jackson St.  
Seattle, WA 98104

RE: United States Bakery (dba Franz) Comment Letter--Puget Sound Regional Transit Authority (Sound Transit) West Seattle and Ballard Link Extensions Draft EIS--Sound Transit ROW I.D. WS5712 (2901 6th Ave. S.)

To Whom It May Concern:

I am writing on behalf of United States Bakery (dba Franz) regarding Sound Transit's proposed "flyover" through the south parking lot at 2901 6<sup>th</sup> Ave. S. It is our understanding that Sound Transit is looking at three configurations for the proposed flyover, identified in Ch. 4 of Appendix L to the DEIS as DUW-1a (see Figure L4.1-4a on p.74/266 of App. L, Ch. 4), Option DUW-1b (Fig. L4-1-5a, p. 84/266), and Alternative DUW-2 (L4.1-6a, p. 94/266).

Franz is the lessee of the bakery facility at that location. We have been there for 25 years and plan on continuing to be there. Our operation generates annually over ninety million pounds of bakery goods for the entire Pacific Northwest (and beyond). The logistics for operating the bakery, particularly loading/unloading raw materials and product, is extremely complicated. The facility operates 24/7 with approximately 200 truck trips per day through the south parking lot. In fact, the south parking lot not only serves as the load/unload/delivery/staging area for the operation, but parking for our 150 employees AND visitors/customers of our outlet store there (nearly 4000 visits per month).

We believe Sound Transit's plan will force either the shut down or temporary relocation of our operation. We are skeptical that a temporary relocation site could be located for us by Sound Transit and even if one was, we doubt it will allow us to function as we do currently. The economic cost to our company would be tremendous, enough that we may not be able to operate. This would impact the employment of 150 employees and have a crippling effect on our PNW food distribution/supply chain.

We urge Sound Transit to reconsider its plans. By moving the flyover just south of the parking lot to the Hanford St. end, the impacts cited above likely can be avoided.

Respectfully,

Michael R. Petitt  
Chief Financial Officer,  
United States Bakery

## EXHIBIT D

206-294-3285

www.sodoseattle.org



270 S Hanford St, Suite 112

Seattle, WA 98134

April 20, 2022

To Whom It May Concern:

I am writing on behalf of the SODO BIA regarding Sound Transit's proposed "flyover" through the south parking lot at 2901 6th Ave. S. It is my understanding that Sound Transit is looking at 3 configurations for the proposed flyover, identified in Ch. 4 of Appendix L to the DEIS as DUW-1a (see Figure L4.1-4a on p.74/266 of App. L, Ch. 4), Option DUW-1b (Fig. L4-1-5a, p. 84/266), and Alternative DUW-2 (L4.1-6a, p. 94/266).

That location has been in active operation as a bakery since the early 1950s. It has generated hundreds of millions of pounds of bakery goods for the entire Pacific Northwest (and beyond). From what we can tell, the logistics for operating the bakery, particularly loading/unloading raw materials and product, is extremely complicated. The facility operates 24/7 with hundreds of trucks and cars per day using the south parking lot.

We are concerned that Sound Transit's plan will force either the shut down or relocation of the operation, either temporarily or permanently. (We are also skeptical that Sound Transit can provide a temporary relocation site.) We believe the flyover could have a crippling effect on the PNW food distribution/supply chain.

We urge Sound Transit to reconsider its plans. By moving the flyover just south of the parking lot to the Hanford St. end, the impacts cited above likely can be avoided.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Erin Goodman', is written over a light blue circular stamp.

Erin Goodman, Executive Director  
SODO Business Improvement Area

## MEMORANDUM

**DATE:** April 26, 2022

**TO:** Terrence Danysh, PRK Livengood, Counsel of Gai/Franz Bakery

**FROM:** Michael Read, PE, Principal, TENW

**SUBJECT:** Traffic Analysis of Sound Transit (ST) 3 Impacts to Gai/Franz Bakery Production Facility  
TENW Project No. 2022-092

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This memorandum summarizes a traffic analysis of the proposed construction of a light rail guideway of the preferred alignment of the *West Seattle and Ballard Link Extensions* documented as part of the Sound Transit 3 DEIS through the existing Gai/Franz Bakery Production Facility in the Duwamish Manufacturing and Industrial Center of Seattle, WA. This memo includes a project description, a description of existing transportation conditions and operations of passenger and truck traffic and other raw product delivery to the site, short-term construction impacts of the proposed guideway and long-term impacts to on-site parking and circulation with structural columns currently proposed within the central on-site parking lot and truck delivery and distribution areas, and identified roadway closures adjacent to the impacted property. In addition, based on our review, an alternative alignment of the proposed guideway that is preliminary within public right-of-way has been identified to significantly reduce direct and indirect impacts of the elevated guideway through the Gai/Franz Bakery Production Facility without any cost impacts to ST's construction budget.

### Subject Site Description & Operations

The existing Gai/Franz Bakery Production Facility was established in 1952 in a centralized location in Seattle and has been expanded and upgraded over the years, most recently in 2019 with a bun line. The location of the facility allows for close access to the regional freeway interstate system, local arterials for truck access/distribution, and rail lines to provide direct access of bulk flour.

The bakery production facility operates 24-hours per day, 7 days per week, and supplies a variety of baked goods that are distributed locally and regionally from Alaska to California as direct outlets and other grocery chains. The facility produces up to 1.8 million pounds of baked goods per week, with 1.2 million pounds of bread and 600,000 pounds of buns. Truck deliveries of bulk material and packaging supplies, truck distribution of finished baked goods, and truck transport of recycled materials for stock feed average up to 200 trucks per week, or 400 average daily vehicle (ADT) trips. Given on-site constraints of vehicle maneuvering and layover, additional localized truck trip generation is approximately 20 percent higher as trucks arrive and then are required to stage off-site when loading docks are full.

The production facility employs 150 people over 3 separate production shifts. During peak production shift changes, approximately 100 vehicles per hour enter/exit the site during peak hours. The Gai/Franz Production Facility also operates a retail outlet store to the general public, which generates approximately 300 daily vehicle trips during its operational hours of 8:00 a.m. to 5:00 p.m. from Monday to Saturday. The southern parking lot, where the currently proposed elevated guideway through the Gai/Franz Production Facility, has surface parking for nearly 60 passenger vehicles, three separate loading docks/bays, and 6 marked stalls for local delivery vehicles. In total, the site generates approximately 900 and 1,200 daily vehicle trips (when on-site retail store is closed, 300 less ADT is generated).

## Sound Transit Elevated Guideway Alignment & Site Impacts

As identified in Sheet L50-GSP119, of the Appendix J drawings of conceptual guideway design from the elevated guideway preferred alignment in the *West Seattle and Ballard Link Extensions DEIS*, four separate structural columns (and associated spread foundations) and several storm water vaults have been identified within the private surface parking lot and vehicle maneuvering areas of the Gai/Franz Bakery Production Facility (see **Exhibit 1**). These transition guideways would provide access from the new Link connections to the existing Link Operations & Maintenance facility immediately southeast of the Gai/Franz Bakery Production Facility.

As shown in **Exhibit 1**, the general building outline in blue (primary bakery production building and on-site delivery truck maintenance building) and structural columns/vaults in red highlight these existing facilities and impact areas. There are also several “signal bungalows” identified on the Sheet exhibit, some of which may be attached to the elevated guideway and others appear to be raised structures at-grade that would impact building access or vehicle maneuvering to the Gai/Franz Bakery Production Facility.

Short-term construction and long-term impacts would occur to the Gai/Franz Bakery Production Facility as a result of the proposed preferred alignment through the southern portion of the subject property on-site, and within the undeveloped public right-of-way of S Hanford Street, where additional street parking and vehicle maneuvering to the truck maintenance facility is located. Short-term on construction impacts of 4-6 months that would require full closures of nearly all on-site parking and truck vehicle access would be required to excavate/pour structural foundations, form /pour columns, and form/pour the guideway and/or crane lift completed pre-fabricated guideway sections. As a 24-hour, 7 days per week bakery production facility, these short-term construction impacts alone could not be fully mitigated by Sound Transit. Considering even a phased construction and staging effort, which would likely elongate the construction period to nearly a year or require removal and relocation of the existing on-site truck maintenance facility to allow for construction staging or alternative truck maneuvering area, would impact the ability for large truck vehicle maneuvering on-site.

Long-term impacts would also occur under the preferred alignment to the Gai/Franz Bakery Production Facility, including loss of on-site parking (8 marked stalls) and structural columns that would increase conflict zones with large truck vehicle maneuvering on-site. In addition to these impacts of long-term daily vehicle operations, the installation of the elevated guideway would also significantly impact the ability of the building accessibility that requires crane lifts to vertically service rooftop facilities of the primary productions building or to access the existing exterior flour tanks/pumping systems within the southwest quadrant of the production facility.

**Exhibit 2** provides a series of Autoturn analyses of large truck maneuvering on-site with the proposed structural columns from the conceptual design prepared by Sound Transit. Several different design vehicles have been modeled based upon the typical design vehicles that delivers or transports at the Gai/Franz Bakery Production Facility, including a WB-67 and a WB-67D. Given multiple unload/load dock locations, four different iterations of these design vehicles are presented. Based on this analysis, an addition loss of 1 parking stall would occur, and the side-loading dock using the WB-109D design vehicle would result in shy distances of less than 1 foot to existing buildings and the new columns for the elevated guideway that would not meet standard engineering practice of 3 feet design offset as shown in Sheet 3 of 4 in **Exhibit 2**. As such, with the proposed structural columns within the parking lot area and near loading docks where large truck maneuvering occurs, significant delays in vehicle circulation would occur and likely

**6th Ave So. Pty LLC Ex. E**

vehicle strikes by tractor/trailers combinations are expected on existing private fixed objects to avoid impacts to new vertical columns.

## Roadway Closure Construction Impacts

As identified in Attachment N.1E Construction-Related Roadway Modifications, a number of roadway closures are expected during construction of either rail alignment alternative in the vicinity of the Gai/Franz Bakery Production Facility (see **Exhibit 3**). Most impactful are expected evening and weekend full closures of 6<sup>th</sup> Avenue S between S Forest Street and S Horton Streets (along the entire site frontage of the subject property as identified in Table N.1E-5) that would, without further information, occur for an indeterminate period during construction. As a 24-hour, 7 days per week operation, the Gai/Franz Bakery Production Facility that produces nearly 2 million pounds of bread products per week would experience profound significant adverse traffic impacts from loss of all vehicle access that would likely result in full operational closure of the facility (as the operational parameters of the production facility does not allow for full shut down of the entire facility for long term periods). Peak overnight evening hours of the Gai/Franz Bakery Production Facility occur during shift changes from 9:00 PM to 11:00 PM and 4:00 AM to 6:00 AM with approximately 100 vehicles per hour during these periods, and peak product distribution from 5:00 PM to 10:00 PM and 6:00 AM to 10:00 AM with approximately 20 peak hourly truck maneuvers on a continuous daily basis.

## Proposed Alignment to Mitigate Impacts to Gai/Franz Bakery Production Facility

Review of on-site operations with management/ownership by TENW as well as research of property ownership of private, BNSF, and public right-of-way, resulted in evaluation of a proximate, but buildable alternative alignment of the elevated guideway. The existing on-site truck maintenance facility for Franz Bakery delivery trucks has service bay openings within the on-site parking lot and into the undeveloped public right-of-way of S Hanford Street. A "triangular portion" of this undeveloped right-of-way is used to access to the truck service bays, parking for delivery trucks, and also temporary staging for trailers and other active trucking maneuvers waiting for load/unload bays to be available at the primary production facility. While access this area can only be completed given an adjacent BNSF rail spur line, it does provide an important component to delivery truck maintenance operations. This area does not however, have critical ongoing access requirements to the primary Gai/Franz Bakery Production Facility building or the three different truck load/unload docks. As such, a minor realignment of the proposed elevated guideway has been conceptually demonstrated as method to mitigate direct and indirect traffic and parking impacts of the preferred alignment through the currently proposed primary parking lot and truck delivery areas on-site.

**Exhibit 4** provides an overview of the alternative alignment, which includes an alignment to the south of the existing on-site delivery truck maintenance building primarily within public right-of-way. Revised locations of structural columns and elevated guideway alignment has been drawn with consistent radius transition to the service line guideway within the SODO Busway as proposed by Sound Transit. Depending upon the reason behind the planned construction roadway closure of 6<sup>th</sup> Avenue S along the entire project frontage during peak weekend/evening periods, truck/vehicle access could be maintained to the site to/from the north via S Forest Street to construct the elevated guideway along this alternative alignment.



6th Ave So. Pty LLC Ex. E

## Conclusion

Based upon our review of the *West Seattle and Ballard Link Extensions* documented as part of the Sound Transit 3 DEIS in the context of transportation impacts to the existing Gai/Franz Bakery Production Facility in the Duwamish Manufacturing and Industrial Center of Seattle, WA, we have determined the following key issues of concern, some of which, would result in significant adverse impacts.

The currently proposed elevated guideway through the existing Gai/Franz Bakery Production Facility would create both short-term construction and long-term operational impacts to the existing parking facility and truck loading docks in the southern portion of the facility.

- Short-term on construction impacts of 4-6 months that would require full closures of nearly all on-site parking and truck vehicle access would be required to excavate/pour structural foundations, form /pour columns, and form/pour the guideway and/or crane lift completed pre-fabricated guideway sections.
- Long-term impacts would also occur under the preferred alignment to the Gai/Franz Bakery Production Facility, including loss of on-site parking (8 marked stalls) and structural columns that would increase conflict zones with large truck vehicle maneuvering on-site. Viability of long-term building roof access for maintenance repair of production facility and flour transfer towers between adjacent rail lines and the production facility in the southwest quadrant of the building would also occur as a result of a vertical structure through the parking facility/truck maneuvering areas.
- Most impactful are expected evening and weekend full closures of 6<sup>th</sup> Avenue S between S Forest Street and S Horton Streets (along the entire site frontage of the subject property as identified in Table N.1E-5) that would, without further information, occur for an indeterminate period during construction. As a 24-hour, 7 days per week operation, the Gai/Franz Bakery Production Facility that produces nearly 2 million pounds of bread products per week would experience profound significant adverse traffic impacts from loss of all vehicle access that would likely result in full operational closure of the facility.

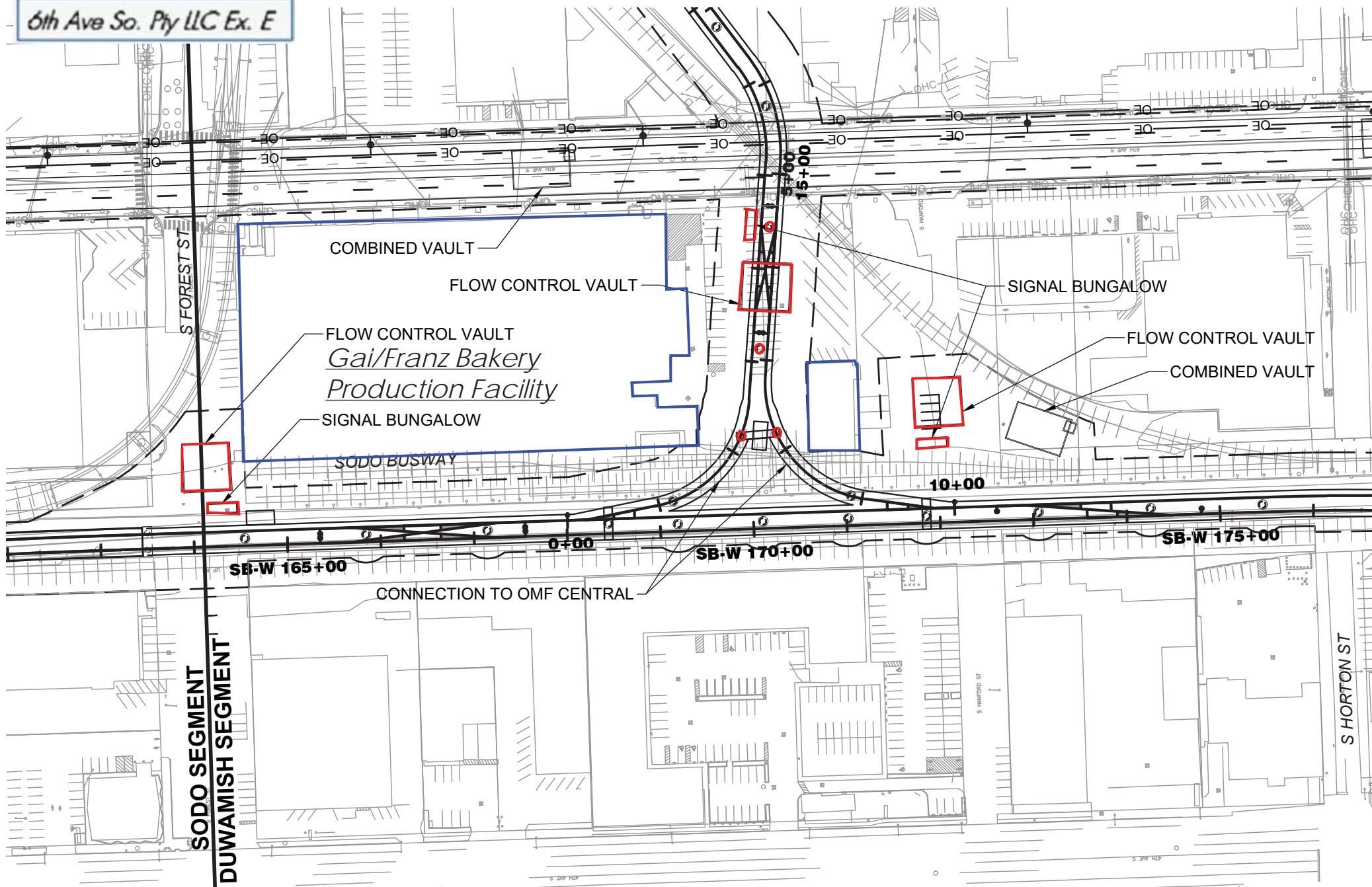
The identified alternative alignment, which includes an alignment to the south of the existing on-site delivery truck maintenance building primarily within public right-of-way, would mitigate a majority of these adverse transportation impacts. Also possible with this alignment, is to mitigate the planned construction roadway closure of 6<sup>th</sup> Avenue S along the entire project frontage during peak weekend/evening periods. Under this alternative alignment, truck/vehicle access could be maintained to the site to/from the north via S Forest Street to construct the elevated guideway.

If you have any questions regarding the information presented in this memo, please call me at (206) 361-7333 x 101 or [mikeread@tenw.com](mailto:mikeread@tenw.com).

Exhibit 1  
Overview of Guideway Impacts to Gai/Franz Bakery  
Production Facility

6th Ave So. Pty LLC Ex. E

SEE DWG L50-GSP130



SODO SEGMENT  
DUWAMISH SEGMENT

COMBINED VAULT

FLOW CONTROL VAULT

FLOW CONTROL VAULT  
*Gai/Franz Bakery  
Production Facility*

SIGNAL BUNGALOW

SODO BUSWAY

SB-W 165+00

0+00

SB-W 170+00

10+00

SB-W 175+00

CONNECTION TO OMF CENTRAL

SIGNAL BUNGALOW

FLOW CONTROL VAULT

COMBINED VAULT

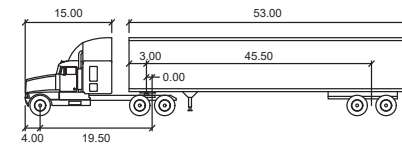
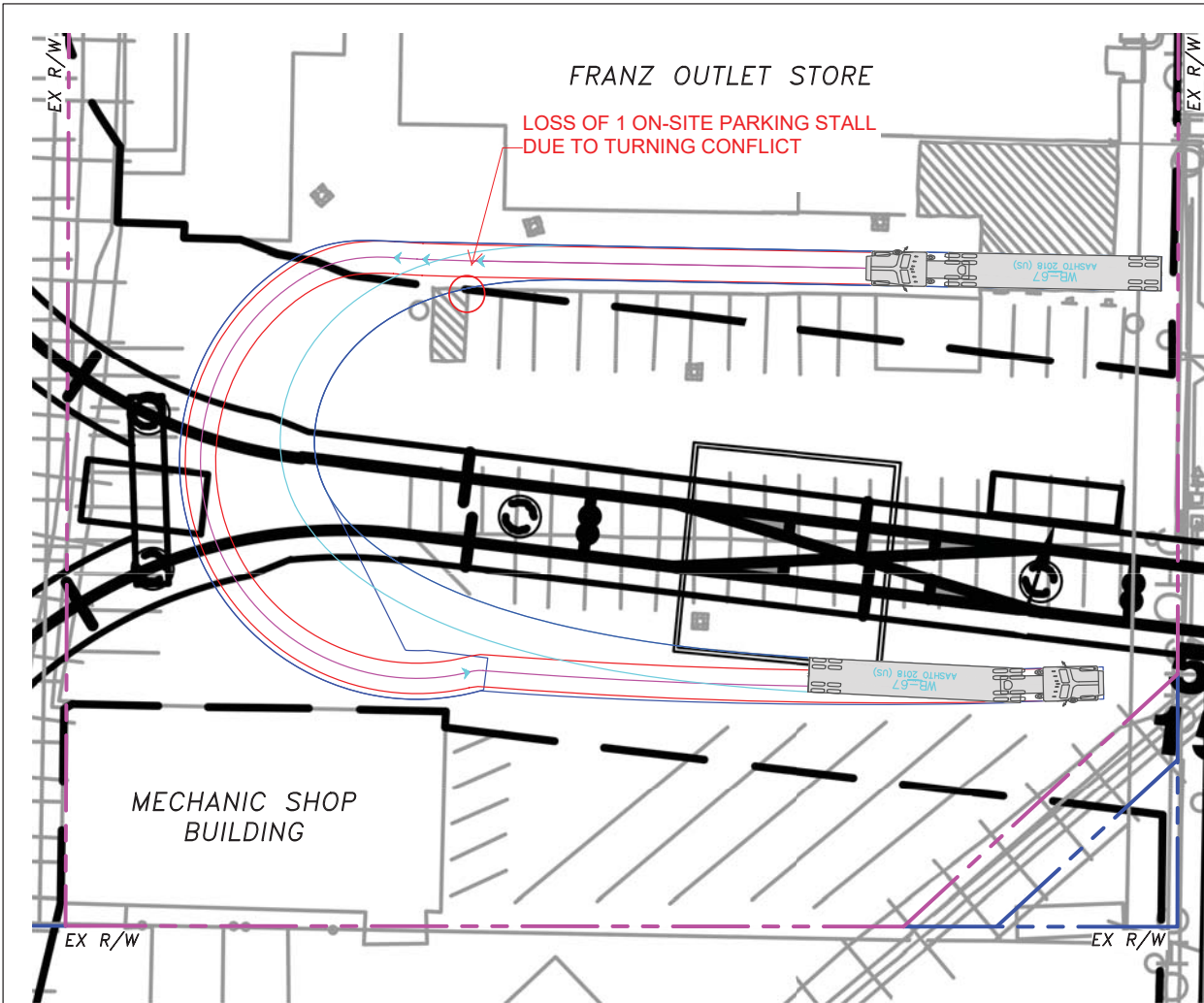
SODO SEGMENT  
DUWAMISH SEGMENT

S HORTON ST

S HANFORD ST

S FOREST ST

Exhibit 2  
Structural Column Impacts using Autoturn Analysis of  
WB-67 and WB-109D Vehicle Maneuvering at the  
Gai/Franz Bakery Production Facility



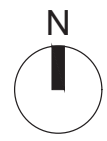
WB-67		feet	
Tractor Width	: 8.00	Lock to Lock Time	: 6.0
Trailer Width	: 8.50	Steering Angle	: 28.4
Tractor Track	: 8.00	Articulating Angle	: 75.0
Trailer Track	: 8.50		

AUTOTURN GENERAL NOTES:

1. AUTOTURN MOVEMENTS ARE GENERATED BY A COMPUTER MODEL. RESULTS SHOULD BE CONSIDERED APPROXIMATE AND USED CONSERVATIVELY.
2. ACTUAL DESIGN VEHICLE DIMENSIONS MAY VARY.
3. A 'SUCCESSFUL' SIMULATION DOES NOT CONCLUDE THAT ALL DRIVERS WOULD BE ABLE TO COMPLETE OR REPLICATE THE MODELED TURNING MOVEMENT WITH ACTUAL DRIVING SCENARIOS.
4. OTHER DRIVEABLE PATHS MAY EXIST.



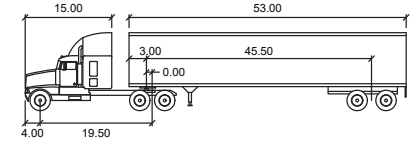
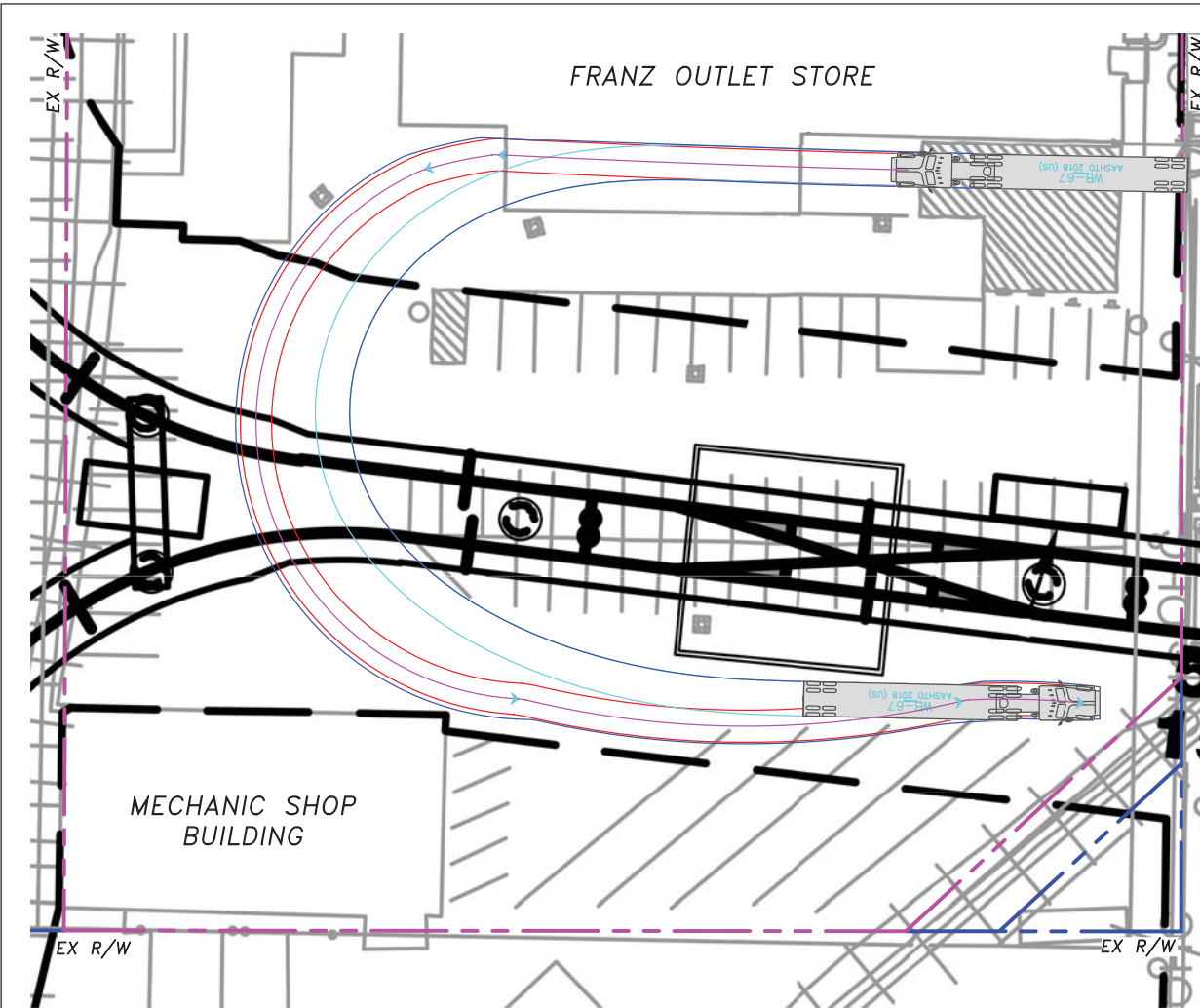
PRELIMINARY - FOR DISCUSSION ONLY



**TENW**  
Transportation Engineering NorthWest

Transportation Planning | Design | Traffic Impact & Operations  
11400 SE 8th Street, Suite 200, Bellevue, WA 98004 | Office (425) 889-6747  
Project Contact: Michael Read, P.E.  
Phone: 206-999-4145

<b>GAI-FRANZ</b>	SHEET
<b>6TH AVE / FORREST ST BUILDING</b>	<b>1</b>
<b>WB-67 DESIGN VEHICLE</b>	OF
<b>PARKING LOT LOOP</b>	<b>4</b>



WB-67		feet	
Tractor Width	: 8.00	Lock to Lock Time	: 6.0
Trailer Width	: 8.50	Steering Angle	: 28.4
Tractor Track	: 8.00	Articulating Angle	: 75.0
Trailer Track	: 8.50		

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4. OTHER DRIVEABLE PATHS MAY EXIST.

LEGEND	
	VEHICLE BODY ENVELOPE
	FRONT TIRE PATH
	REAR TIRE PATH

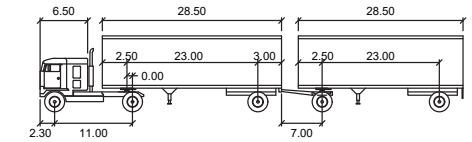
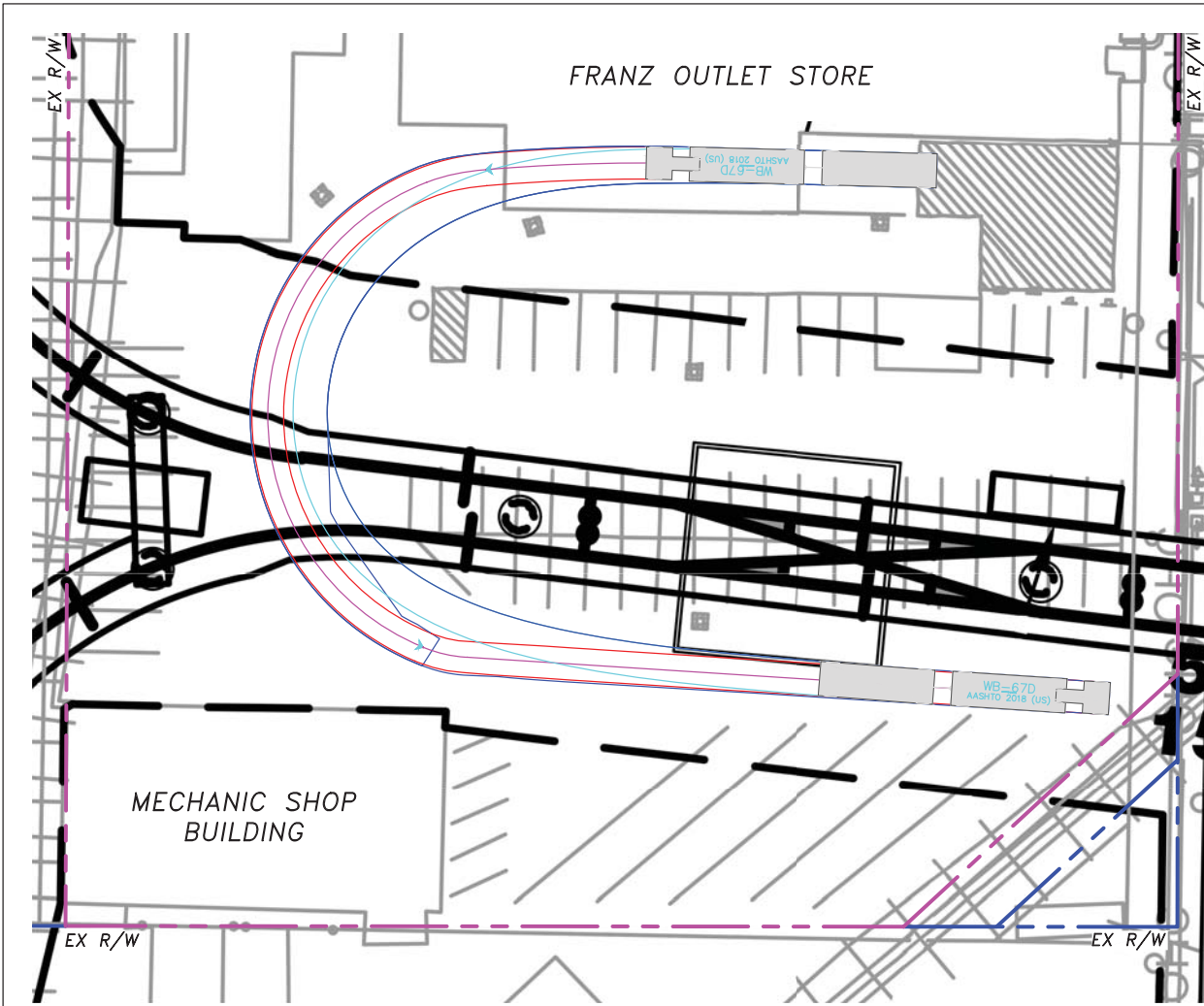
PRELIMINARY - FOR DISCUSSION ONLY



DATE: 04/26/2022

**TENW**  
 Transportation Engineering NorthWest  
 Transportation Planning | Design | Traffic Impact & Operations  
 11400 SE 8th Street, Suite 200, Bellevue, WA 98004 | Office (425) 889-6747  
 Project Contact: Michael Read, P.E.  
 Phone: 206-999-4145

<b>GAI-FRANZ</b>		SHEET
<b>6TH AVE / FORREST ST BUILDING</b>		<b>2</b>
<b>WB-67 DESIGN VEHICLE</b>		OF
<b>PARKING LOT LOOP - OFFSET POSITION</b>		<b>4</b>



WB-67D

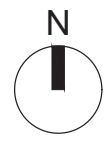
feet			
Tractor Width	: 6.50	Lock to Lock Time	: 6.0
Trailer Width	: 28.50	Steering Angle	: 15.6
Tractor Track	: 8.00	Articulating Angle	: 70.0
Trailer Track	: 8.50		

**AUTOTURN GENERAL NOTES:**

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4. OTHER DRIVEABLE PATHS MAY EXIST.



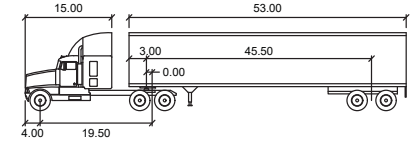
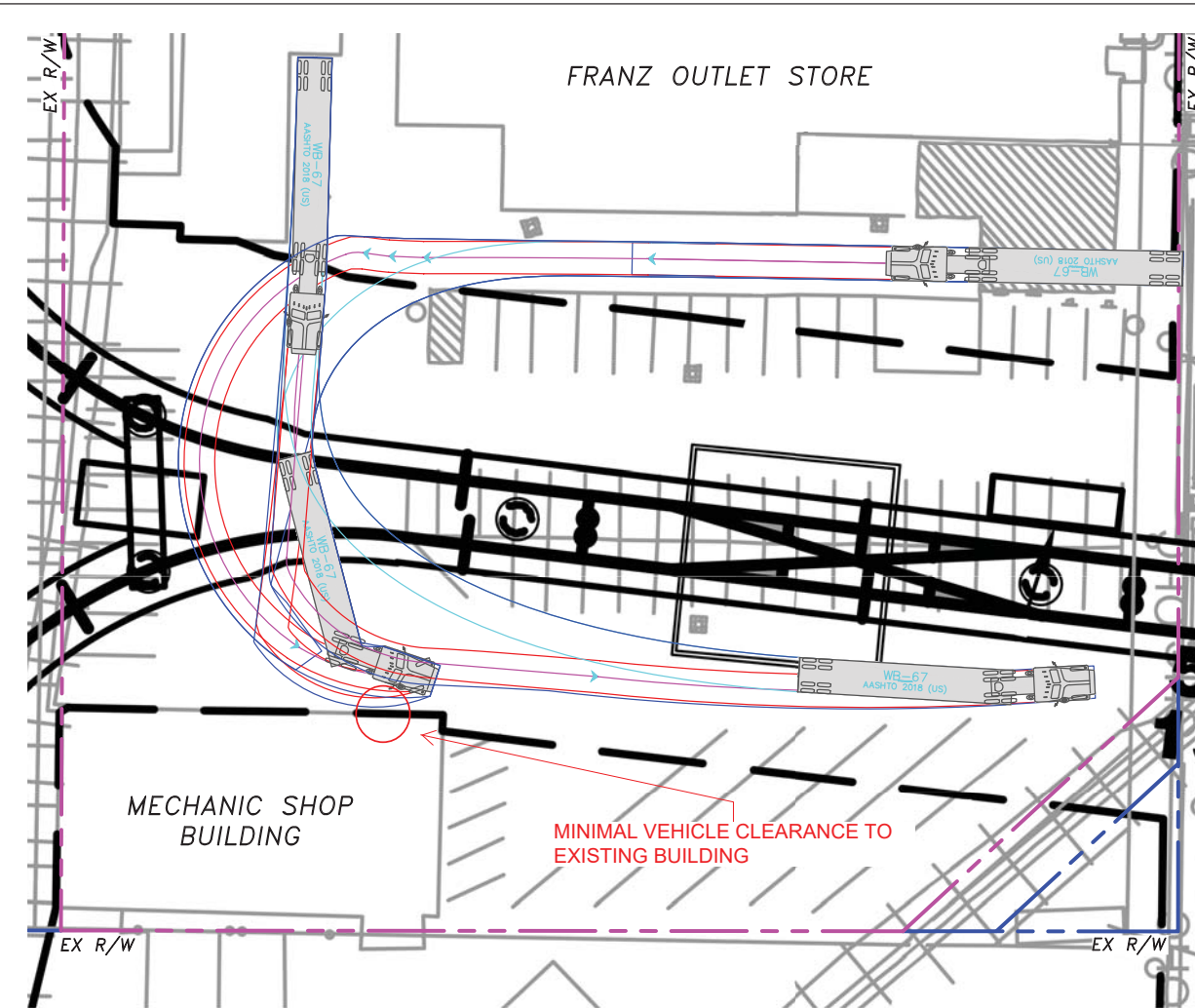
PRELIMINARY - FOR DISCUSSION ONLY



DATE: 04/26/2022

**TENW**  
 Transportation Engineering NorthWest  
 Transportation Planning | Design | Traffic Impact & Operations  
 11400 SE 8th Street, Suite 200, Bellevue, WA 98004 | Office (425) 889-6747  
 Project Contact: Michael Read, P.E.  
 Phone: 206-999-4145

<b>GAI-FRANZ</b>		SHEET
<b>6TH AVE / FORREST ST BUILDING</b>		<b>3</b>
<b>PARKING LOT LOOP - OFFSET POSITION</b>		OF
		<b>4</b>



WB-67		feet	
Tractor Width	: 8.00	Lock to Lock Time	: 6.0
Trailer Width	: 8.50	Steering Angle	: 28.4
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4. OTHER DRIVEABLE PATHS MAY EXIST.

LEGEND	
	VEHICLE BODY ENVELOPE
	FRONT TIRE PATH
	REAR TIRE PATH

PRELIMINARY - FOR DISCUSSION ONLY



DATE: 04/26/2022

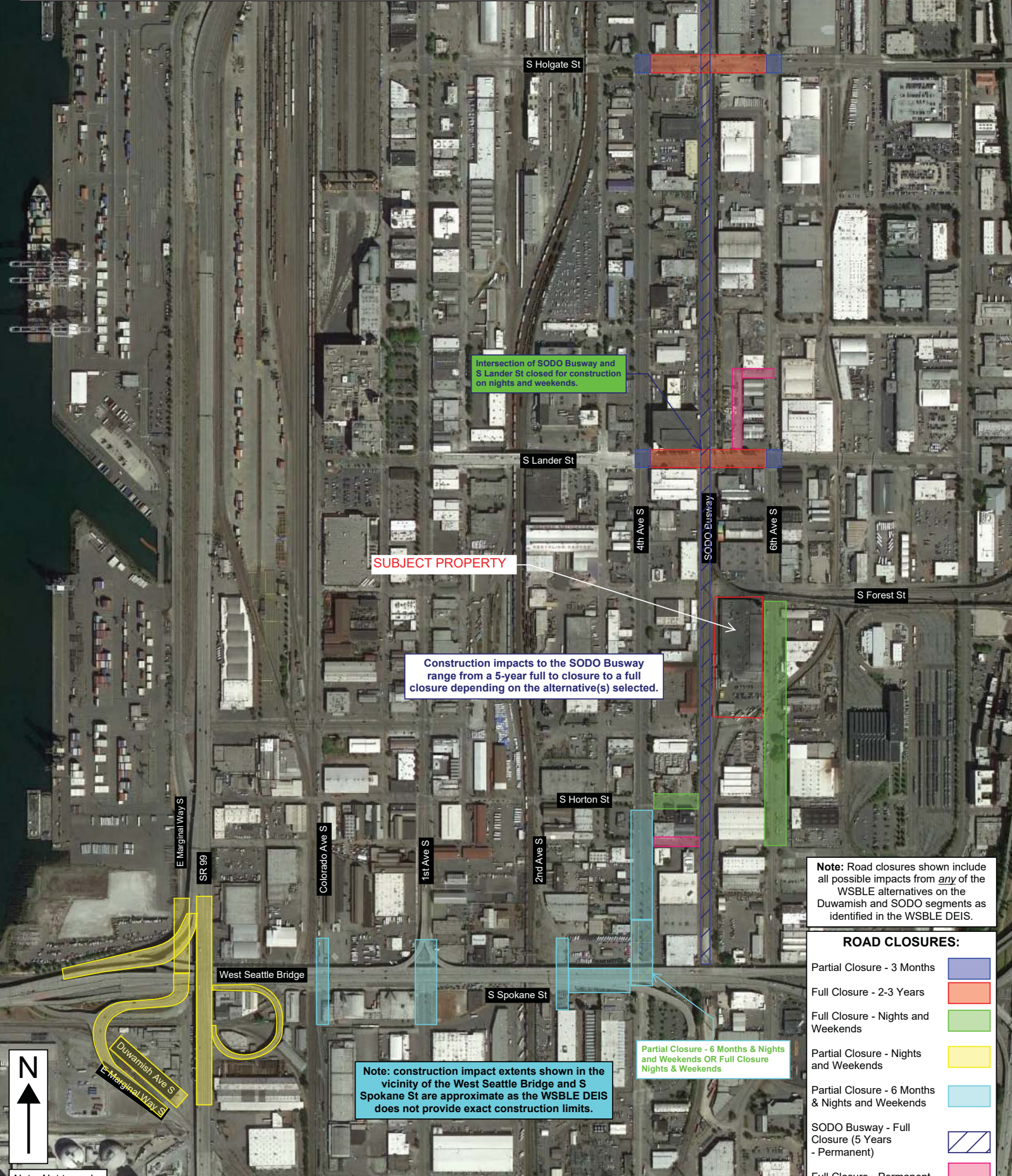
**TENW**  
 Transportation Engineering NorthWest  
 Transportation Planning | Design | Traffic Impact & Operations  
 11400 SE 8th Street, Suite 200, Bellevue, WA 98004 | Office (425) 889-6747  
 Project Contact: Michael Read, P.E.  
 Phone: 206-999-4145

<b>GAI-FRANZ</b>		SHEET
<b>6TH AVE / FORREST ST BUILDING</b>		<b>4</b>
<b>WB-67 DESIGN VEHICLE</b>		OF
<b>PARKING LOT LOOP - BACKING IN</b>		<b>4</b>



Exhibit 3  
Roadway Closures Planned by Sound Transit in  
Project Vicinity

# EXHIBIT 3 - SODO & West Seattle Bridge Segments - Construction Closure Summary in Vicinity of Gai/Franz Production Facility



Intersection of SODO Busway and S Lander St closed for construction on nights and weekends.

**SUBJECT PROPERTY**

Construction impacts to the SODO Busway range from a 5-year full to closure to a full closure depending on the alternative(s) selected.

**Note:** Road closures shown include all possible impacts from any of the WSBLE alternatives on the Duwamish and SODO segments as identified in the WSBLE DEIS.

**ROAD CLOSURES:**

- Partial Closure - 3 Months
- Full Closure - 2-3 Years
- Full Closure - Nights and Weekends
- Partial Closure - Nights and Weekends
- Partial Closure - 6 Months & Nights and Weekends
- SODO Busway - Full Closure (5 Years - Permanent)
- Full Closure - Permanent

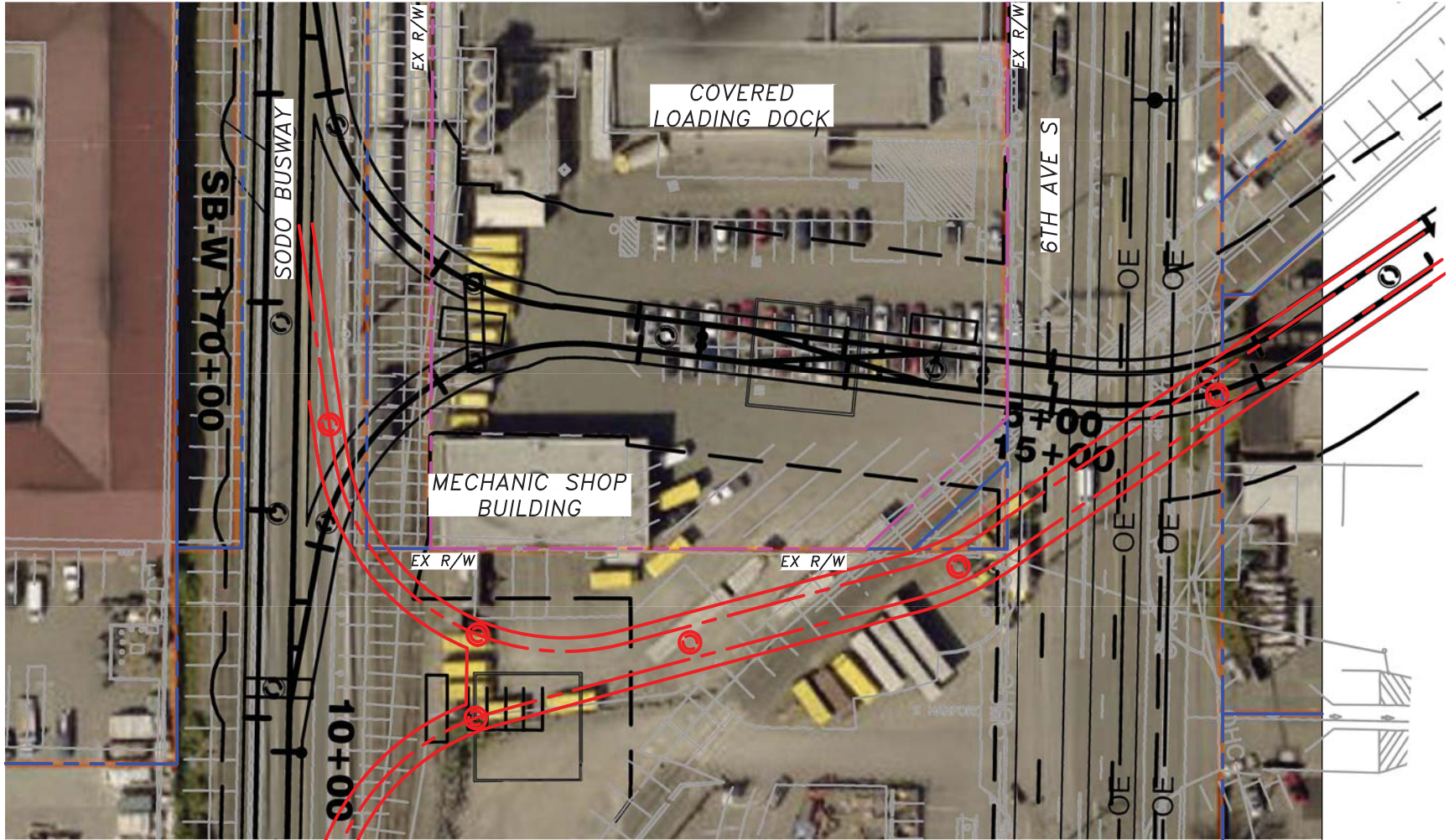
**Note:** construction impact extents shown in the vicinity of the West Seattle Bridge and S Spokane St are approximate as the WSBLE DEIS does not provide exact construction limits.

Partial Closure - 6 Months & Nights and Weekends OR Full Closure Nights & Weekends



Note: Not to scale.

Exhibit 4  
Alternative Elevated Guideway Alignment to Mitigate  
Impacts to Gai/Franz Bakery Production Facility



PRELIMINARY - FOR DISCUSSION ONLY



Transportation Engineering NorthWest

Transportation Planning | Design | Traffic Impact & Operations  
11400 SE 8th Street, Suite 200, Bellevue, WA 98004 | Office (425) 889-6747  
Project Contact: Michael Read, P.E.  
Phone: 206-999-4145

GAI-FRANZ  
6TH AVE / FORREST ST BUILDING

PROPOSED RAIL ALIGNMENT

SHEET

1

OF

1



OPINION OF VALUE | 2901 6TH AVE S, SEATTLE, WA 98134

Prepared by

**Nick Ramirez**

Associate Vice President  
nick.ramirez@kidder.com

# FRANZ BUILDING





Date February 10, 2022

**RE: Brokers Opinion of Value  
2901 6th Ave S  
Seattle, WA, 98134  
King County Parcel # 766620-4210**

Dear Don:

We have completed the following Opinion of Value. This Opinion is based on the property being environmentally clean. As you may be aware, a negative environmental report could drastically affect the value and marketability of the property.

Based on our evaluation, we feel this property today is worth **\$25,250,000**. If we were going to market this property for sale, we would recommend a higher asking price.

Please contact us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nick Ramirez'.

Nick Ramirez

This brokers' price opinion is not an appraisal as defined in chapter 18.140 RCW and has been prepared by a real estate licensee, licensed under chapter 18.85 RCW, who is not also state certified or state licensed as a real estate appraiser under chapter 18.140 RCW. The opinion is based on the property being environmentally clean.



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Building Aerial

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Income Approach to Value  
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## 03

### TAX INFORMATION

Property Detail Report  
Parcel Map

## 04

### SALE COMPARABLES

## PREPARED BY

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### KIDDER.COM

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SECTION 01

# PROPERTY DESCRIPTION

Vicinity Aerial

Building Aerial





# PROPERTY DESCRIPTION

## 2901 6TH AVE S, SEATTLE, WA

The property is located in the South Seattle Industrial District, which is the oldest industrial concentration in the Puget Sound region. It is bordered by Seattle's Central Business District (CBD) to the north and extends approximately eight miles south. Martin Luther King Jr. Way bounds the district on the east and Hwy. 99 bounds it on the west. The district is

located primarily east of the Duwamish Waterway, a narrow river valley that empties into Seattle's Elliott Bay. The property's immediate neighborhood is referred to as SODO.

The neighborhood is characterized by older masonry industrial buildings used for light manufacturing, warehousing and retail stores with many of the buildings in the neighborhood benefitting from rail service.

\*King County Tax Assessor provided

177,220 SF

LAND

122,903 SF

BUILDING\*





# VICINITY AERIAL





# BUILDING AERIAL





**SECTION 02**

# PROPERTY EVALUATION

Cost Approach to Value

Income Approach to Value

Market Approach to Value

Conclusion of Sale Analysis



# COST APPROACH TO VALUE

## 2901 6TH AVE S, SEATTLE, WA

The estimated replacement cost of a property is determined by establishing the cost of comparable land together with estimating specific construction costs and soft costs to arrive at a total valuation. The amount of accrued depreciation is estimated and deducted from the replacement cost to arrive at the current value of the property.

### LAND VALUE

Land Value - If Vacant                      177,220 SF                      @                      \$100 PSF                      =                      \$17,722,000

### ESTIMATED REPLACEMENT COST OF IMPROVEMENTS

Building Value                      122,903 SF                      @                      \$200 PSF                      =                      \$24,580,600

Plus Indirect/Soft Costs                      @                      10%                      =                      \$2,458,060

**Total Replacement Cost                      =                      \$27,038,660**

Less Accrued Depreciation of Building Value                      @                      40%                      =                      (\$10,815,464)

**Estimated Value of Improvements                      =                      \$16,223,196**

**Total Estimated Value of Land and All Improvements                      =                      \$33,945,196**



# INCOME APPROACH TO VALUE

## 2901 6TH AVE S, SEATTLE, WA

The income approach produces an estimate of value or range of values by establishing a gross and net income and capitalizing the annual net income. Economic rental and capitalization rates are based on prevailing rates for comparable properties and open market sale transactions which indicate accepted capitalization rates for properties which have similar characteristics.

### PROJECTED INCOME AND EXPENSE ANALYSIS

Gross Monthly Operating Income - from Existing Lease	=	\$75,760
Gross Annual Operating Income	=	\$909,119
Less vacancy and credit loss (5% of net rent)		(\$45,455)
<b>Effective Net Income</b>	<b>=</b>	<b>\$863,664</b>
Less Non-Reimbursed Operating Expenses		
Reserves (3%)	=	(\$25,909)
Misc. / Management (2%)	=	(\$17,273)
<b>Net Operating Income</b>	<b>=</b>	<b>\$820,482</b>

### VALUE FOR INCOME APPROACH

Annual Net Operating Income	=	\$820,482
Probable Capitalization Rate	=	3.5%
<b>Estimated Income Value</b>	<b>=</b>	<b>\$23,442,343</b>



# MARKET APPROACH TO VALUE

## 2901 6TH AVE S, SEATTLE, WA

The Market Approach produces an estimate of value of a property by comparing it with similar properties of the same type and class that have been sold recently or are currently offered for sale in the same or competing areas.

Comparable sales over the last year in the Kent area indicates a purchase price for similar properties ranged between \$200 and \$240 per square foot of building. The building sales vary widely in size, lot configuration, and location. Based upon our experience, we estimate the current market value for a purchaser of the property to be \$220 per square foot.

### MARKET ANALYSIS

Land with Building	122,903 SF	@	\$220 PSF	=	\$27,038,660
--------------------	------------	---	-----------	---	--------------

In considering the comparable sales along with the competitive buildings, a comparable sales value of **\$27,038,660** is appropriate for the **Franz Building**.



## Property Evaluation

**\$33,945,196**

COST APPROACH  
TO VALUE

**\$23,442,343**

INCOME APPROACH  
TO VALUE

**\$27,038,660**

MARKET APPROACH  
TO VALUE

# CONCLUSION OF SALE ANALYSIS

“

With these factors in mind, we feel that Franz Building located at 2901 6th Ave S, should be valued at \$25,250,000.

”







**SECTION 03**

# TAX INFORMATION

Property Detail Report

Parcel Map



# PROPERTY DETAIL REPORT

## Owner Information

Owner Name 1	<b>GAI, DONALD</b>	Owner Name 2	--
Mailing Address	<b>17301 NE 126TH PL REDMOND WA 98052</b>	Owner Type	--
Vesting Code Desc	<b>COMPANY/CORPORATION</b>	Vesting Code	<b>CO</b>

## Location Information

Legal Description <b>SEATTLE TIDE LDS E 270 FT LESS 17 FT R/W OVER 12</b>			
County	<b>KING</b>	Parcel No. (APN)	<b>766620-4210</b>
FIPS Code	<b>53033</b>	Alternative APN	--
Census Trct/Blk	<b>009300/3</b>	Legal Book/Page	--
Twnshp-Rnge-Sect	<b>24-04-08</b>	Map Reference	--
Legal Land Lot	<b>12-22</b>	School District	<b>Seattle Public Schools</b>
Legal Block	<b>274</b>	Subdivision	<b>SEATTLE TIDE LDS BL 01-376</b>

## Last Market Sale Information

Recording Date	<b>2002/06/28 00:00:00</b>	New Construction	--
Sale Date	<b>2002/06/28 00:00:00</b>	1st Mtg Amount	--
Sale Price	--	1st Mtg Type	--
Price Per SF	--	1st Mtg Doc. No.	--
Price Per Acre	--	Sale Doc. No.	<b>20020708001503</b>
Deed Type	--	Transfer Doc. No.	<b>20020708001503</b>
Sale Type	--	Seller Name	--
Title Company	--	Lender	--

## Last Transfer of Ownership

Recording Date	<b>2002/07/08 00:00:00</b>	Book Number	--
Doc. Number	<b>20020708001503</b>	Page Number	--
Doc. Type	<b>BS</b>		

## Prior Sale Information

Recording Date	--	Sale Type	--
Sale Date	--	Transfer Doc. No.	--
Sale Price	--	New Construction	--
Sale Doc. No.	--	Title Company	--
Seller Name	--	Lender	--

## Property Characteristics

Building Area	<b>116,543 SF</b>	Total Rooms	--
No. of Units	--	Bedrooms	--
No. of Stories	<b>1</b>	Bathrooms	--
Year Built	<b>1952 / 1975 Effective</b>	Basement	--
Condition	--	Basement Area	--
Construction	<b>MASONRY</b>	Heat Type	<b>HOT WATER</b>
Roof Type	--	Air Cond. Type	--
Roof Material	--	Fireplace	--
Parking Spaces	--		



# PROPERTY DETAIL REPORT

## Site Information

Zoning	<b>IG1 U/85</b>	Assessor Acreage	<b>4.07</b>
County Use Code	--	Calculated Acreage	<b>4.07</b>
County Use Code Desc.	<b>INDUSTRIAL LIGHT MANUFACTURING</b>	Assessed Lot SF	<b>177,202</b>
Calculated Lot SF	<b>177,172</b>	Land Use Code	<b>5001</b>
Assessor Lot W/D	<b>/</b>	Land Use Desc.	<b>MANUFACTURING (LIGHT)</b>
Topography	--	Land Use Category	<b>INDUSTRIAL (GENERAL)</b>

## Tax and Value Information

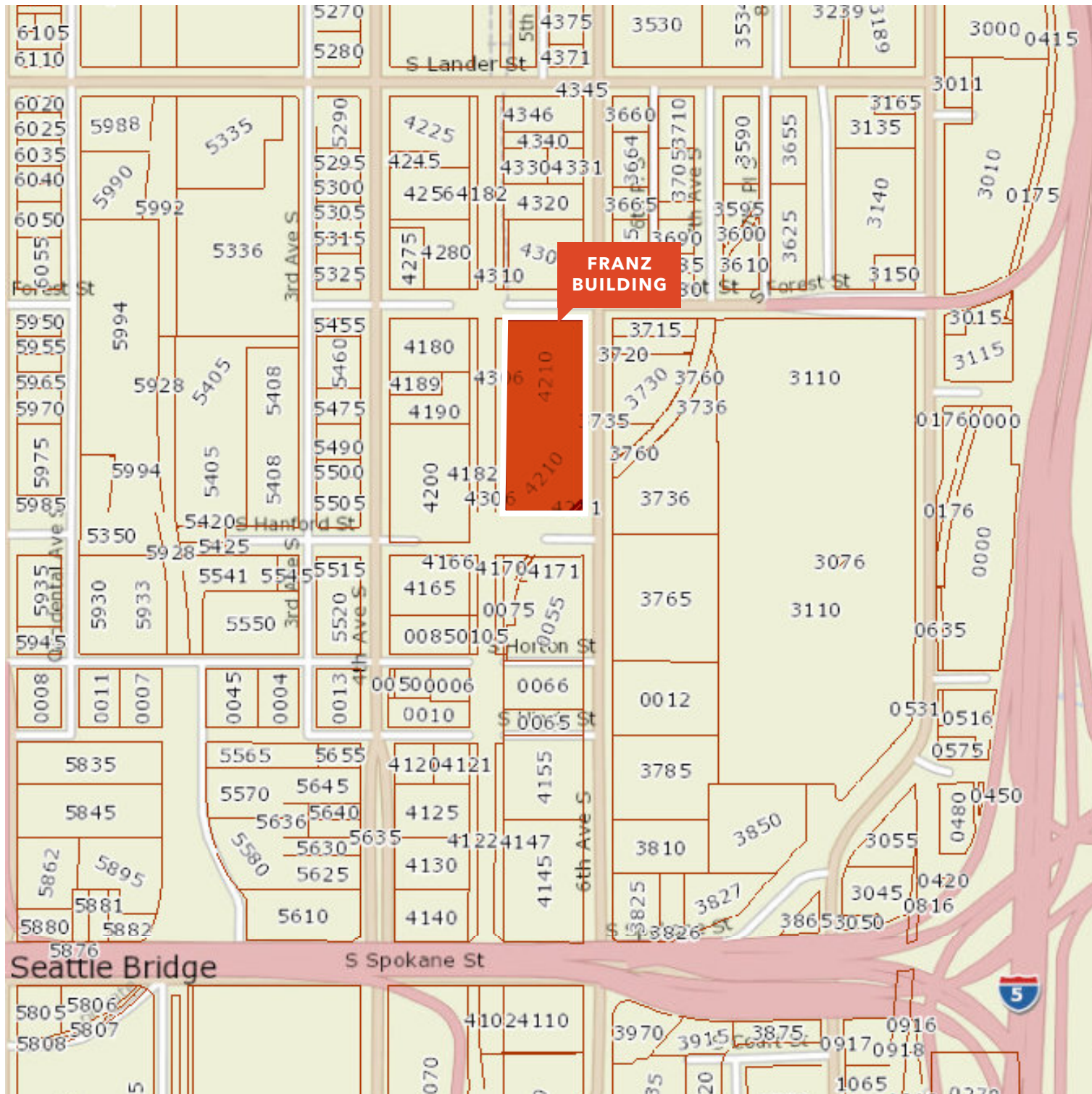
Tax Year	<b>2021</b>	Improvement Value	<b>\$1,865,500</b>
Property Tax	<b>\$162,283</b>	Improvement %	<b>13.07%</b>
Tax Rate Code	<b>0010</b>	Market Value Year	<b>2020</b>
Tax Exemption	--	Total Market Value	<b>\$14,270,900</b>
Assessed Year	<b>2020</b>	Land Market Value	<b>12405400</b>
Assessed Value	<b>\$14,270,900</b>	Market Imprv. Value	<b>1865500</b>
Land Value	<b>\$12,405,400</b>	AVM Value	--

## Hazard Information

Flood Zone	--	Flood Panel	<b>53033C0630G</b>
Flood Panel Date	<b>08/19/2020</b>	Wetland Type	--
Wetland Classification	--		



# PROPERTY PARCEL MAP





**SECTION 04**

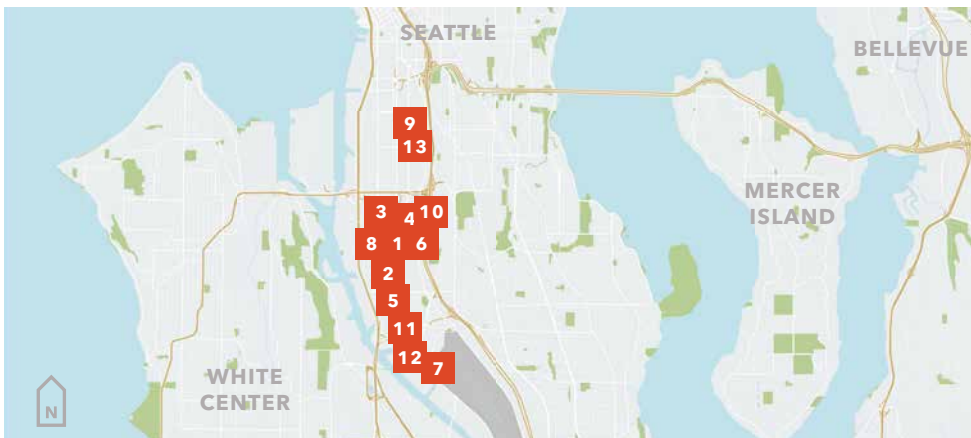
# COMPARABLES


Industrial Sale Comparables

1ST QUARTER 2021

# SEATTLE INDUSTRIAL REPORT

## COMPARABLES



	Property	Sale Date	Sale Price	Bldg Size	Land Area	Bldg Price PSF	Land Price PSF
01	 <b>6901 FOX AVE S</b> Seattle, WA	4/5/21	\$21.1M	133,915	235,990	\$158.15	\$89.74
02	 <b>7801 DETROIT AVE SW</b> Seattle, WA	4/5/21	\$5.6M	3,300	31,363	\$1,703.06	\$179.20
03	 <b>3849 1ST AVE S</b> Seattle, WA	4/1/21	\$53.4M	177,827	295,336	\$300.59	\$180.99
04	 <b>5516 4TH AVE S</b> Seattle, WA	3/31/21	\$6.8M	17,216	21,344	\$394.98	\$318.59
05	 <b>327 S KENYON ST</b> Seattle, WA	3/31/21	\$2.1M	8,200	50,965	\$256.10	\$41.20

### MARKET TRENDS

Large Sales	Improving
Leasing Demand	Slow
Demand for Sale Properties (All Sizes)	Improving
Bulk of Vacancy	30K+ SF
Rental Rates	Slightly Lower

↑ 4.02%

VACANCY  
4TH QTR 3.39%

### Provided by

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## COMPARABLES

	Property	Sale Date	Sale Price	Bldg Size	Land Area	Bldg Price PSF	Land Price PSF
06	 <b>5910 CORSON AVE S</b> Seattle, WA	3/18/21	\$6.8M	19,886	37,461	\$341.95	\$181.52
07	 <b>10016 E MARGINAL WAY S</b> Seattle, WA	3/15/21	\$2.1M	4,411	33,197	\$654.50	\$86.97
08	 <b>5903 1ST AVE S</b> Seattle, WA	3/8/21	\$6.8M	2,560	39,204	\$1,923.83	\$125.62
09	 <b>2326 AIRPORT WAY S</b> Seattle, WA	2/24/21	\$2.8M	21,580	81,457	\$592.33	\$156.92
10	 <b>5620 AIRPORT WAY S</b> Seattle, WA	2/24/21	\$4.9M	3,937	9,060	\$188.72	\$82.01
11	 <b>8250 5TH AVE S</b> Seattle, WA	2/1/21	\$12.7M	16,970	103,672	\$239.25	\$39.16
12	 <b>500 S SULLIVAN ST</b> Seattle, WA	2/1/21	\$743k	4,531	82,764	\$648.86	\$35.52
13	 <b>2520 AIRPORT WAY S</b> Seattle, WA	1/28/21	\$4.06M	20,725	71,874	\$289.51	\$83.48

## AVAILABLE SPACES

**01** 

**SOUTH MONROE BUILDING**  
521 S Monroe St, Seattle

Rate	\$10,800/month, plus NNN
Space SF	12,000
Office SF	1,208
Features	4 drive-in doors. 21' clear height. Available 2/1/20

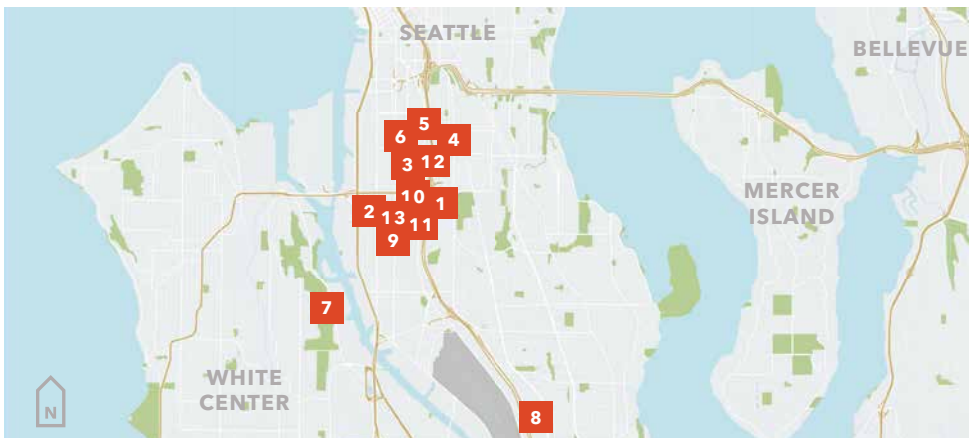
**02** 

**3635 E MARGINAL WAY S**  
Seattle

Rate	\$12,000/mo, NNN
Space SF	8,000
Office SF	800
Features	New bldg, 4 drive-in doors, 1,500 SF add'l shop space with 1 GL door. Available now

# SEATTLE INDUSTRIAL REPORT

## COMPARABLES



	Property	Sale Date	Sale Price	Bldg Size	Land Area	Bldg Price PSF	Land Price PSF
01	 <b>5030 1ST AVE S</b> Seattle, WA	4/20/21	\$12.3M	43,473	46,609	\$282.93	\$263.90
02	 <b>5333 2ND AVE S</b> Seattle, WA (2 properties)	4/21/21	\$2M	1,253	14,792	\$1,596.17	\$135.21
03	 <b>2701 4TH AVE S</b> Seattle, WA	4/30/21	\$3M	9,848	26,972	\$304.63	\$111.23
04	 <b>2408 1ST AVE S</b> Seattle, WA (2 properties)	4/30/21	\$3.957M	28,200	27,877	\$140.33	\$141.96

### MARKET TRENDS

Large Sales	Active
Leasing Demand	Inconsistent
Demand for Sale Properties (All Sizes)	Improving
Bulk of Vacancy	30K+ SF
Rental Rates	Increasing

↓ 3.58%

VACANCY  
1ST QTR 4.02%

### Provided by



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## COMPARABLES

	Property	Sale Date	Sale Price	Bldg Size	Land Area	Bldg Price PSF	Land Price PSF
05	 <b>1700 AIRPORT WAY S</b> Seattle, WA	5/7/21	\$9.5M	50,315	25,203	\$188.81	\$376.94
06	 <b>2454 OCCIDENTAL AVE S</b> Seattle, WA	5/13/21	\$16.45M	51,664	126,324	\$318.40	\$130.22
07	 <b>7717 DETROIT AVE SW</b> Seattle, WA (2 properties)	5/13/21	\$14.325M	50,034	718,003	\$286.31	\$19.95
08	 <b>5201 1ST AVE S</b> Seattle, WA (21 properties)	5/28/21	\$332.75M	782,309	2,123,389	\$425.34	\$156.71
09	 <b>6111 12TH AVE S</b> Seattle, WA	6/1/21	\$1.4M	4,680	5,100	\$299.15	\$274.51
10	 <b>4000 1ST AVE S</b> Seattle, WA (3 properties)	6/10/21	\$24.275M	92,608	153,673	\$262.13	\$157.97
11	 <b>751 S MICHIGAN ST</b> Seattle, WA	6/11/21	\$2.88M	20,495	27,007	\$140.52	\$106.64
12	 <b>3625 1ST AVE S</b> Seattle, WA	6/18/21	\$22M	67,173	199,940	\$327.51	\$110.03
13	 <b>5304 3RD AVE S</b> Seattle, WA	6/29/21	\$2.9M	8,480	9,583	\$341.98	\$302.62

## AVAILABLE SPACES

**01** 

**SOUTH MONROE BUILDING**  
521 S Monroe St, Seattle

Rate	\$10,800/month, plus NNN
Space SF	12,000
Office SF	1,208
Features	4 drive-in doors. 21' clear height. Available now

**02** 

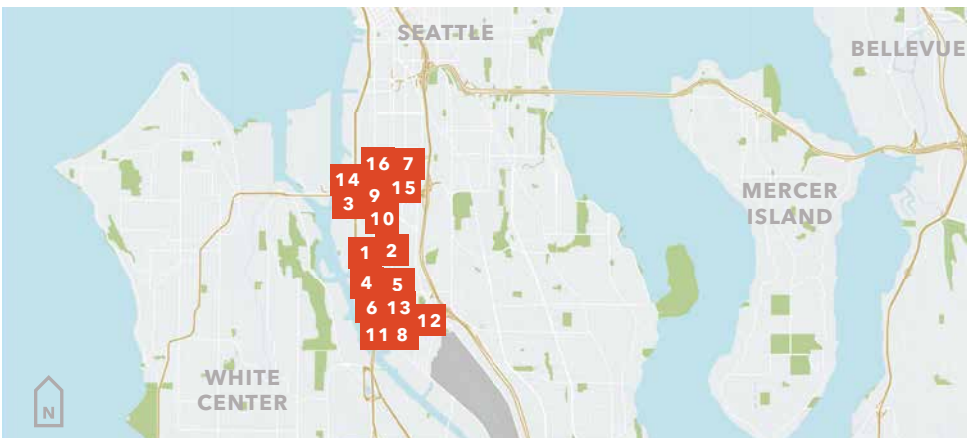
**LONESTAR BUILDING**  
6335 1st Ave S, Ste E, Seattle





Rate	\$11,512/mo, NNN
Space SF	10,465
Office SF	858
Features	1 DH / 1 GL Flexible term and TI's available

3RD QUARTER 2021

# SEATTLE INDUSTRIAL REPORT

## COMPARABLES



	Property	Sale Date	Sale Price	Bldg Size	Land Area	Bldg Price PSF	Land Price PSF
01	 <b>96 S ALASKA ST</b> Seattle, WA	7/9/21	\$5.1M	20,832	24,829	\$244.82	\$205.40
02	 <b>633 S SNOQUALMIE ST</b> Seattle, WA	7/23/21	\$3.1M	10,106	15,245	\$306.75	\$203.35
03	 <b>3401 COLORADO AVE</b> Seattle, WA	7/28/21	\$5.5M	33,462	40,075	\$164.96	\$137.74
04	 <b>5609 4TH AVE S</b> Seattle, WA	8/6/21	\$700K	1,700	2,613	\$411.76	\$267.89

### MARKET TRENDS

Large Sales	Active
Leasing Demand	Inconsistent
Demand for Sale Properties (All Sizes)	Improving
Bulk of Vacancy	30K+ SF
Rental Rates	Increasing

↑ 3.73%

VACANCY  
2ND QTR 3.58%













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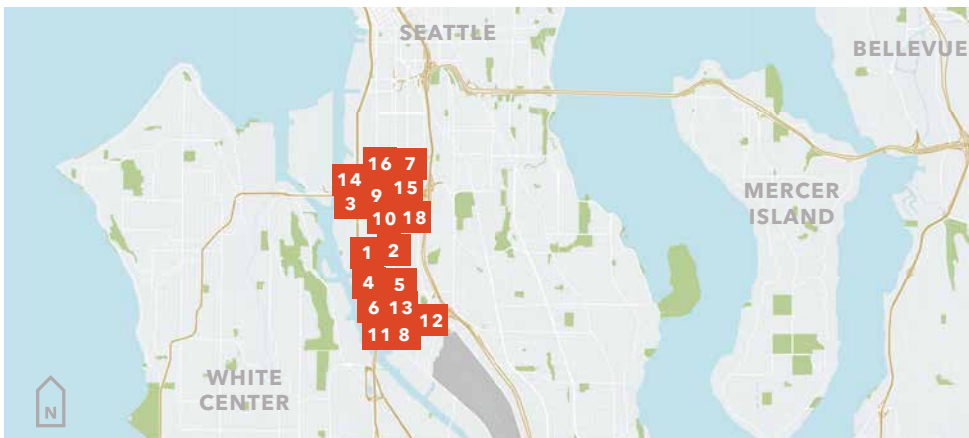






## COMPARABLES

	Property	Sale Date	Sale Price	Bldg Size	Land Area	Bldg Price PSF	Land Price PSF
05	 <b>225 S LUCILE ST</b> Seattle, WA	8/9/21	\$4M	18,232	37,897	\$219.39	\$105.55
06	 <b>206-218 S BRANDON ST</b> Seattle, WA	8/17/21	\$4.7M	19,344	26,136	\$242.97	\$179.83
07	 <b>1736 4TH AVE S</b> Seattle, WA	8/19/21	\$5.8M	13,132	16,117	\$441.67	\$359.87
08	 <b>1024 S ELMGROVE ST</b> Seattle, WA	8/24/21	\$3.85M	10,244	42,510	\$375.83	\$90.57
09	 <b>2921 1ST AVE S</b> Seattle, WA	8/24/21	\$2.1M	12,000	8,712	\$175.00	\$241.05
10	 <b>3667 1ST AVE S</b> Seattle, WA	8/26/21	\$3.92M	11,900	27,878	\$329.92	\$140.83
11	 <b>734 S MONROE ST</b> Seattle, WA	8/26/21	\$1.4M	4,000	5,000	\$350.00	\$280.00
12	 <b>1535 S ALBRO PL</b> Seattle, WA	9/3/21	\$2.05M	9,493	17,859	\$215.95	\$114.79
13	 <b>305 S DAWSON ST</b> Seattle, WA	9/3/21	\$1.9M	5,428	10,018	\$354.64	\$192.15
14	 <b>25-29 S HANFORD ST</b> Seattle, WA	9/10/21	\$10.3M	34,983	47,916	\$295.14	\$215.48
15	 <b>1760 4TH AVE S</b> Seattle, WA (2 properties)	9/15/21	\$13.7M	34,292	64,394	\$400.97	\$213.53
16	 <b>1521 1ST AVE S</b> Seattle, WA (2 properties)	9/21/21	\$251M	347,874	93,779	\$722.24	\$2,679.17

# SEATTLE INDUSTRIAL REPORT

## COMPARABLES



	Property	Sale Date	Sale Price	Bldg Size	Land Area	Bldg Price PSF	Land Price PSF
01	 <b>1709 AIRPORT WAY S</b> Seattle, WA	1/11/22	\$14.4M	35,500	100,802	\$408.28	\$143.79
02	 <b>5215 5TH AVE S</b> Seattle, WA	12/30/21	\$2.2M	8,008	10,019	\$285.96	\$228.57
03	 <b>225 S LUCILE ST</b> Seattle, WA	12/27/21	\$1.08M	20,092	37,897	\$53.75	\$28.50
04	 <b>13-21 S NEVADA ST</b> Seattle, WA	12/23/21	\$10.47M	39,900	62,726	\$262.53	\$167.00

### MARKET TRENDS

Large Sales	Active
Leasing Demand	Inconsistent
Demand for Sale Properties (All Sizes)	Improving
Bulk of Vacancy	30K+ SF
Rental Rates	Increasing

↓ 3.63%

VACANCY  
3RD QTR 3.73%















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## COMPARABLES

	Property	Sale Date	Sale Price	Bldg Size	Land Area	Bldg Price PSF	Land Price PSF
05	 <b>3430 E MARGINAL WAY S</b> Seattle, WA	12/20/21	\$3.3M	16,300	23,522	\$202.45	\$140.29
06	 <b>9014 14TH AVE S</b> Seattle, WA	12/17/21	\$1M	696	9,801	\$1,436.78	\$102.03
07	 <b>500 S PORTLAND ST</b> Seattle, WA	12/16/21	\$10.9M	75,000	103,673	\$146.00	\$105.62
08	 <b>818 S DAKOTA ST</b> Seattle, WA	12/7/21	\$7.9M	24,670	56,628	\$320.23	\$139.51
09	 <b>4601 W MARGINAL WAY</b> Seattle, WA	12/2/21	\$1.8M	1,600	52,272	\$1,125.00	\$34.44
10	 <b>2701 AIRPORT WAY S</b> Seattle, WA	11/24/21	\$1.3M	2,465	8,276	\$527.38	\$157.08
11	 <b>2260 1ST AVE S</b> Seattle, WA	11/22/21	\$1.55M	1,235	8,002	\$1,255.06	\$193.70
12	 <b>6401 CARLETON AVE S</b> Seattle, WA	11/12/21	\$1.65M	15,278	24,829	\$108.00	\$66.45
13	 <b>703 S MONROE ST</b> Seattle, WA	11/2/21	\$1.75M	N/A	20,000	N/A	\$87.50
14	 <b>5300 4TH AVE S</b> Seattle, WA	10/29/21	\$4.12M	12,755	14,584	\$323.10	\$282.58
15	 <b>404 S BRANDON ST</b> Seattle, WA	10/29/21	\$3.2M	1,848	15,555	\$1,731.60	\$205.72
16	 <b>1237 S DIRECTOR ST</b> Seattle, WA	10/28/21	\$1.7M	7,056	45,738	\$240.93	\$37.17
17	 <b>6251 AIRPORT WAY S</b> Seattle, WA	10/15/21	\$18.42M	24,929	74,488	\$739.10	\$247.36
18	 <b>2400-2450 8TH AVE S</b> Seattle, WA	10/7/21	\$32M	85,213	108,029	\$375.53	\$296.22

## CONTACT

**NICK RAMIREZ**

206.248.6521

[nick.ramirez@kidder.com](mailto:nick.ramirez@kidder.com)

**KIDDER MATHEWS**

12886 Interurban Avenue S

Seattle, WA 98168

[KIDDER.COM](http://KIDDER.COM)



## EXHIBIT G

**From:** Lutu, Leroy <[Leroy.Lutu@marcusmillichap.com](mailto:Leroy.Lutu@marcusmillichap.com)>  
**Sent:** Monday, February 28, 2022 12:17 PM  
**To:** Lutu, Leroy <[Leroy.Lutu@marcusmillichap.com](mailto:Leroy.Lutu@marcusmillichap.com)>  
**Subject:** Franz Bakery Warehouse - 2901 6th Ave S, Seattle

Hi Don,

I was having a difficult time tracking down the best phone number to reach you by telephone, however, I was hoping to speak to you directly. I hope this emails will suffice for now.

My team and I have recently closed several large industrial deals in Seattle and on the eastside – totaling over \$70,000,000 in 2021.

Specifically, one of the groups we closed a \$34,000,000 industrial property last year has given me some intimate details and strategy to acquire up to 2+ million more square feet of industrial real estate in Seattle and surrounding markets in the next 24 months.

They have a long-term hold strategy, and I have experienced first had their capability of paying the most competitive, top-market prices.

As of right now there is, quite literally, no industrial inventory on the market. Considering the lack of inventory and their aggressiveness on off-market opportunities currently, I believed it would be very worthwhile to talk to you in regards to your industrial building at 2901 6<sup>th</sup> Ave S. The timing seems serendipitous, given the extremely favorable market conditions for owners of industrial property in the area.

Based on the information I have, your property (2901 6<sup>th</sup> Ave S) in Seattle is approx.. ~122,903+/- SF. At some of the most recent industrial pricing metrics we've transacted (\$300-\$320/sf + ) in Seattle and on the Eastside, I believe they could produce an offer around \$36,000,000-\$39,000,000+ for the property.

Based on what I know about their interest, openness, and vast liquid capital which they are actively looking to deploy, I believe this would be very worthwhile and beneficial to explore with you further.

Kindly give me a call at your earliest convenience or let me know when there is a good time to connect. I look forward to speaking with you.

Thank you.

Best regards,

**Leroy Lutu**  
*Associate Director*

601 Union Street, Suite 2710, Seattle, WA 98101

E: [Leroy.Lutu@marcusmillichap.com](mailto:Leroy.Lutu@marcusmillichap.com)

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**April 18, 2022**

**To: Sound Transit c/o Lauren Swift**

**Re: WSBLE Draft Environmental Impact Statement Comments**

Alaskan Copper Works (ACW) has operated in the SODO area of Seattle since 1913. The company is a manufacturer and fabricator of corrosion-resistant metal products and currently employs about 85 workers at its 6<sup>th</sup> Avenue South campus in Seattle.

Sound Transit previously acquired a portion of the ACW campus in the 1990's to create the present SODO Operations and Maintenance Facility (OMF). In those negotiations, Sound Transit and ACW went to great lengths to ensure that truck, cart and forklift mobility around the ACW campus buildings and storage areas was maintained.

We understand you favor a proposed "DUW-1a" alignment for the West Seattle and Ballard Link connection to the OMF. This alignment would cross parts of the ACW campus at grade level and appears to block the circulation paths around the buildings and the primary exit from the property, thus impeding truck, cart and forklift mobility. These blockages may make shipping, receiving, storage and other essential materials handling functions at the facility extremely difficult, or impossible, leaving ACW in the foreboding situation of having to consider relocating the entire operation. Relocating a facility of this scale and type, with its unique machinery installations developed over many years, is very difficult and is probably not economically possible within the Seattle area. We thus can anticipate the possibility of permanent job losses resulting from this proposed alignment being in the order of 50-70 employees.

We also understand you have considered an alternate "DUW-2" alignment. This alignment would also cross our campus but from a southerly direction that appears to be less impactful to the critical circulation paths around the ACW buildings and storage areas.

We hope you will seriously consider this alternate alignment in order to reduce the risk of losing "family wage" industrial jobs in our urbanized area now being served by Sound Transit. Most of the employees who might be affected are represented by unions and about 60% of our employees reflect the diversity of southern Seattle and are racial minorities.

Please see the exhibits we have attached indicating, in pictorial form, the boundaries of the ACW campus, its critical internal roadways, how your favored alignment would block these roadways and how your alternate alignment may avoid these blockages.

Thank you for your consideration of these matters. We hope you will be able to revise your presently favored proposed alignment of the connection to the OMF, as it affects the ACW campus, in the final EIS you are preparing.

Regards,

A handwritten signature in black ink that reads "William M. Rosen". The signature is written in a cursive style with a large, prominent "W" and "R".

William M. Rosen  
Manager  
Alaskan Copper Works

**Exhibit 1: Alaskan Copper Works campus in 2022 (yellow line outlines ACW assemblage boundary)**



**Exhibit 2: Alaskan Copper Works campus critical roadways (shown in red)**



**Exhibit 3: Alaskan Copper Works campus critical roadways (shown in red) overlaid with ST proposed Alignment (DUW-1a) (shown in yellow)**



**Exhibit 4: Alaskan Copper Works campus critical roadways (shown in red) overlaid with ST proposed Alignment (DUW-2) (shown in yellow)**



**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 502937 – Alaskan Copper Draft EIS Comment**

#	Comments	Responses
1	<p>We understand you favor a proposed "DUW-1a" alignment for the West Seattle and Ballard Link connection to the OMF. This alignment would cross parts of the ACW campus at grade level and appears to block the circulation paths around the buildings and the primary exit from the property, thus impeding truck, cart and forklift mobility. These blockages may make shipping, receiving, storage and other essential materials handling functions at the facility extremely difficult, or impossible, leaving ACW in the foreboding situation of having to consider relocating the entire operation. Relocating a facility of this scale and type, with its unique machinery installations developed over many years, is very difficult and is probably not economically possible within the Seattle area. We thus can anticipate the possibility of permanent job losses resulting from this proposed alignment being in the order of 50-70 employees. We also understand you have considered an alternate "DUW-2" alignment. This alignment would also cross our campus but from a southerly direction that appears to be less impactful to the critical circulation paths around the ACW buildings and storage areas. We hope you will seriously consider this alternate alignment in order to reduce the risk of losing "family wage" industrial jobs in our urbanized area now being served by Sound Transit. Most of the employees who might be affected are represented by unions and about 60% of our employees reflect the diversity of southern Seattle and are racial minorities. Please see the exhibits we have attached indicating, in pictorial form, the boundaries of the ACW campus, its critical internal roadways, how your favored alignment would block these roadways and how your alternate alignment may avoid these blockages.</p>	<p>Following publication of the WSBLE Draft EIS in January 2022, the Sound Transit Board confirmed Alternative DUW-1a as the preferred alternative in the Duwamish Segment in July 2022. Sound Transit appreciates the detailed information about your business operations and the challenges that would be associated with relocating it. Sound Transit has met with representatives of Alaskan Copper Works to discuss operations at this property and potential impacts. As noted in Section 4.3, Economics, of the WSBLE Draft EIS and the West Seattle Link Extension Final EIS, Alaskan Copper Works is expected to be displaced by all of the Duwamish Segment alternatives. Please see Section 4.3, Economics, for more information on business and employee displacements.</p> <p>Please see response to CC4.1a in Table 7-1 in Chapter 7, Comment Summary, of the Final EIS.</p>

## Sound Transit Projects - Communications (1 Total)

**Search Term**

499883

**Communication ID: 499883**

**Communication ( 4/11/2022 )**

According to the Draft EIS, King County Parcel 7666704005 -- 2414 SW Andover St -- is identified as a likely acquisition for each of the eight alternatives (Appendix L4.1, Table L4.1-3). DEL-5 and DEL-6 would place a station directly within what is currently Frye Commerce Center (FCC).

FCC is owned by the Frye Art Museum, which uses the revenue generated from rents to fund the museum and keep it free and accessible. FCC is also home to Alki Beach Academy (ABA), which currently serves nearly 130 children and plans to expand in the near future to serve around 300 children. This would make it the largest child care center in the city. Yet, despite comments made throughout the Racial Equity Toolkit report about equitable development and the need for assets like child care in communities of color, Sound Transit fails to acknowledge ABA's presence in Delridge (Appendix L4.4, Table L4.4-1). The programs that are identified (Blazing Trails and Bright Horizons) are not on potentially affected parcels for ANY of the alternatives. Bright Horizons is listed at the wrong address, and it's actual address is not impacted. Blazing Trails isn't even anywhere near the project sight.

After ABA's planned expansion, they will make up 1 in 5 licensed child care slots in 98106 (the most racially diverse and lowest income zip code in West Seattle). Relocating this program would have tremendously negative impacts on the availability of child care for the Delridge area. Because they are the only program that may be displaced, this is the definition of disproportionate impact on communities in which Sound Transit is supposed to be promoting equity.

**DO NOT DISPLACE ALKI BEACH ACADEMY!**

**Owner(s):**

Contact ID	Name	Type	Phones	Email
<a href="#">1074761</a>	<a href="#">Jordan Crawley</a>	Individual		<a href="mailto:jordan.a.crawley@gmail.com">jordan.a.crawley@gmail.com</a>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 499883 - Alki Beach Academy, Jordan Crawley Draft EIS Comment**

#	Comments	Responses
1	<p>King County Parcel 7666704005 -- 2414 SW Andover St -- is identified as a likely acquisition for each of the eight alternatives (Appendix L4.1, Table L4.1-3). DEL-5 and DEL-6 would place a station directly within what is currently Frye Commerce Center (FCC). FCC is owned by the Frye Art Museum, which uses the revenue generated from rents to fund the museum and keep it free and accessible. FCC is also home to Alki Beach Academy (ABA), which currently serves nearly 130 children and plans to expand in the near future to serve around 300 children. This would make it the largest child care center in the city. Yet, despite comments made throughout the Racial Equity Toolkit report about equitable development and the need for assets like child care in communities of color, Sound Transit fails to acknowledge ABA's presence in Delridge (Appendix L4.4, Table L4.4- 1). The programs that are identified (Blazing Trails and Bright Horizons) are not on potentially affected parcels for ANY of the alternatives. Bright Horizons is listed at the wrong address, and it's actual address is not impacted. Blazing Trails isn't even anywhere near the project sight. After ABA's planned expansion, they will make up 1 in 5 licensed child care slots in 98106 (the most racially diverse and lowest income zip code in West Seattle). Relocating this program would have tremendously negative impacts on the availability of child care for the Delridge area. Because they are the only program that may be displaced, this is the definition of disproportionate impact on communities in which Sound Transit is supposed to be promoting equity. DO NOT DISPLACE ALKI BEACH ACADEMY!</p>	<p>Please see response to CC4.4c in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Impacts to Alki Beach Academy have been added to Section 4.4, Social Resources, Community Facilities, and Neighborhoods, of the Final EIS. In developing alternatives, Sound Transit avoids and minimizes impacts where possible, but some displacement would be unavoidable. Sound Transit acknowledges the inconvenience and hardship of relocating a residence or business. Sound Transit will work closely with each displaced business to determine its needs and help it find a new site if the owner chooses to relocate. Section 4.1, Acquisitions, Displacements, and Relocations, of the Final EIS provides information on property acquisition and relocation processes and the relocation assistance and benefits that Sound Transit will provide. Information about affected properties is provided in Appendix L4.1 and includes the properties noted in the comment. Sound Transit is aware of and appreciates the role of your business within the community.</p>

## Sound Transit Projects - Communications (1 Total)

**Search Term**

500853

**Communication ID: 500853**

Communication ( 4/21/2022 )

I am the Education Director at Alki Beach Academy. I am commenting regarding the Delridge segment of the West Seattle Link extension. I oppose any alternatives that require the relocation of Alki Beach Academy in the Frye Commerce Center (2414 SW Andover St). Alki Beach Academy is a large child care center with plans to grow exponentially in the near future, becoming the largest child care program in the city. With the child care shortage as it stands, worsened by the pandemic, the last thing we should be doing is displacing the programs providing the type of high-quality early learning opportunities our children desperately need. We have built a strong program that has already affected so many families in a positive way for their children. Other families deserve to experience this same program for their children. We will be serving over 1000 children by the time the light rail goes through West Seattle and relocating us would be next to impossible. Please do not force us to have to do this.

Thank you for your time.

Colleen Hitchcock

Education Director

Alki Beach Academy

**Owner(s):**

Contact ID	Name	Type	Phones	Email
1075478	Colleen Hitchcock	Individual		colleen.hitchcock1@gmail.com

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 500853 - Alki Beach Academy, Colleen Hitchcock Draft EIS Comment**

#	Comments	Responses
1	<p>I oppose any alternatives that require the relocation of Alki Beach Academy in the Frye Commerce Center (2414 SW Andover St). Alki Beach Academy is a large child care center with plans to grow exponentially in the near future, becoming the largest child care program in the city. With the child care shortage as it stands, worsened by the pandemic, the last thing we should be doing is displacing the programs providing the type of high-quality early learning opportunities our children desperately need. We have built a strong program that has already affected so many families in a positive way for their children. Other families deserve to experience this same program for their children. We will be serving over 1000 children by the time the light rail goes through West Seattle and relocating us would be next to impossible. Please do not force us to have to do this.</p>	<p>Please see response to CCG2 and CC4.4c in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Impacts to Alki Beach Academy have been added to Section 4.4, Social Resources, Community Facilities, and Neighborhoods, of the Final EIS. In developing alternatives, Sound Transit avoids and minimizes impacts where possible, but some displacement would be unavoidable. Sound Transit acknowledges the inconvenience and hardship of relocating a residence or business. Sound Transit will work closely with each displaced business to determine its needs and help it find a new site if the owner chooses to relocate. Section 4.1, Acquisitions, Displacements, and Relocations, of the Final EIS provides information on property acquisition and relocation processes, and the relocation assistance and benefits that Sound Transit will provide. Information about affected properties is provided in Appendix L4.1 and includes the properties noted in the comment. Sound Transit is aware of and appreciates the role of your business within the community.</p>



## Sound Transit Projects - Communications (1 Total)

**Search Term**

500610

**Communication ID: 500610 - Joan Schneider Draft EIS Comment**

**Communication** ( 4/18/2022 )

Joan Schneider Draft EIS Comment

We represent the owners of the Alki Lumber property at 4406 36th Avenue Southwest (East Block) and 4440 Fauntleroy Way Southwest (West Block). Both Blocks are currently being redeveloped and when completed the Project will provide over 500 new transit-oriented residences and a dynamic retail core along 36th Avenue in the Triangle, where an unusually wide right-of-way provides a unique opportunity for community engagement along with a heritage retail location for Alki Lumber itself, which has been serving the community for over 100 years.

We believe our transit-oriented Project will complement an adjacent Avalon Station by providing a dense community of residents and businesses; however, we are concerned there are current oversights in the DEIS that would create unintended consequences if not addressed in the Final EIS; especially the troubling impacts of preferred alternative WSJ-1 in terms of both general transportation disruption and resulting displacement of neighborhood businesses as well as aesthetic, noise, vibration and neighborhood cohesion impacts. WSJ-1's guideway would literally and figuratively cast a dark shadow over this transformative neighborhood.

Of the preferred alternatives, we believe tunnel alternative WSJ-3a should be advanced with modifications as the final preferred alternative. WSJ-3a reduces the issues with neighborhood cohesion and displacement compared to the above-grade alternatives, and the future station option on 41st Avenue SW is a better location compared to 42nd Avenue SW as it will have less impact on existing established businesses in the heart of the Junction during construction.

We further believe the DEIS currently represents inadequate study of cumulative impacts, and provides insufficient mitigation information, in several areas including the lack of sufficient information on cumulative impacts of transportation and road closures -- including paths of temporary and permanent-term closures and re-routes -- as well as the lack of sufficient information on separate and cumulative impacts of tunnel routes on the businesses and residents above them.

Thank you for considering these comments.

**Owner(s):**

Contact ID	Name	Type	Phones	Email
<a href="#">1075282</a>	<a href="#">Joan Schneider</a>	Individual		<a href="mailto:jschneider17@comcast.net">jschneider17@comcast.net</a>

## Appendix O. Draft EIS Comment Summary and Response to Comments

### Communication ID: 500610 – Alki Lumber, Joan Schneider Draft EIS Comment

#	Comments	Responses
1	<p>we are concerned there are current oversights in the DEIS that would create unintended consequences if not addressed in the Final EIS; especially the troubling impacts of preferred alternative WSJ-1 in terms of both general transportation disruption and resulting displacement of neighborhood businesses as well as aesthetic, noise, vibration and neighborhood cohesion impacts. WSJ-1's guideway would literally and figuratively cast a dark shadow over this transformative neighborhood.</p>	<p>Please see responses to CCG2, CC4.4a, CC4.5a, and CC4.7a in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS.</p>
2	<p>Of the preferred alternatives, we believe tunnel alternative WSJ-3a should be advanced with modifications as the final preferred alternative. WSJ-3a reduces the issues with neighborhood cohesion and displacement compared to the above-grade alternatives, and the future station option on 41st Avenue SW is a better location compared to 42nd Avenue SW as it will have less impact on existing established businesses in the heart of the Junction during construction.</p>	<p>Please see response to CCG2 in Table 7.1.</p>
3	<p>We further believe the DEIS currently represents inadequate study of cumulative impacts, and provides insufficient mitigation information, in several areas including the lack of sufficient information on cumulative impacts of transportation and road closures -- including paths of temporary and permanent-term closures and re-routes -- as well as the lack of sufficient information on separate and cumulative impacts of tunnel routes on the businesses and residents above them.</p>	<p>Please see responses to CCG1, CC3c, and CC5a in Table 7-1.</p>

## Sound Transit Projects - Communications (1 Total)

**Search Term**

503701

**Communication ID: 503701 - Lisa Guthrie Draft EIS Comment**

**Communication ( 4/27/2022 )**

Lisa Guthrie Draft EIS Comment

To whom it may concern:

We represent the owners of the Alki Lumber property at 4406 36th Avenue Southwest (East Block) and 4440 Fauntleroy Way Southwest (West Block). Both Blocks are currently being redeveloped and when completed the Project will provide over 500 new transit-oriented residences and a dynamic retail core along 36th Avenue in the Triangle, where an unusually wide right-of-way provides a unique opportunity for community engagement along with a heritage retail location for Alki Lumber itself, which has been serving the community for over 100 years.

We believe our transit-oriented Project will complement an adjacent Avalon Station by providing a dense community of residents and businesses; however, we are concerned there are current oversights in the DEIS that would create unintended consequences if not addressed in the Final EIS; especially the troubling impacts of preferred alternative WSJ-1 in terms of both general transportation disruption and resulting displacement of neighborhood businesses as well as aesthetic, noise, vibration and neighborhood cohesion impacts. WSJ-1's guideway would literally and figuratively cast a dark shadow over this transformative neighborhood.

Of the preferred alternatives, we believe tunnel alternative WSJ-3a should be advanced with modifications as the final preferred alternative. WSJ-3a reduces the issues with neighborhood cohesion and displacement compared to the above-grade alternatives, and the future station option on 41st Avenue SW is a better location compared to 42nd Avenue SW as it will have less impact on existing established businesses in the heart of the Junction during construction.

We further believe the DEIS currently represents inadequate study of cumulative impacts, and provides insufficient mitigation information, in several areas including the lack of sufficient information on cumulative impacts of transportation and road closures -- including paths of temporary and permanent-term closures and re-routes -- as well as the lack of sufficient information on separate and cumulative impacts of tunnel routes on the businesses and residents above them.

Thank you for considering these comments.

Lisa Sweeney Guthrie

**Owner(s):**

Contact ID	Name	Type	Phones	Email
<a href="#">1078676</a>	<a href="#">Lisa Guthrie</a>	Individual		<a href="mailto:lbguthrie@gmail.com">lbguthrie@gmail.com</a>

## Appendix O. Draft EIS Comment Summary and Response to Comments

### Communication ID: 503701 – Alki Lumber, Lisa Guthrie Draft EIS Comment

#	Comments	Responses
1	<p>we are concerned there are current oversights in the DEIS that would create unintended consequences if not addressed in the Final EIS; especially the troubling impacts of preferred alternative WSJ-1 in terms of both general transportation disruption and resulting displacement of neighborhood businesses as well as aesthetic, noise, vibration and neighborhood cohesion impacts. WSJ-1's guideway would literally and figuratively cast a dark shadow over this transformative neighborhood.</p>	<p>Please see responses to CCG2, CC4.4a, CC4.5a, and CC4.7a in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS.</p>
2	<p>Of the preferred alternatives, we believe tunnel alternative WSJ-3a should be advanced with modifications as the final preferred alternative. WSJ-3a reduces the issues with neighborhood cohesion and displacement compared to the above-grade alternatives, and the future station option on 41st Avenue SW is a better location compared to 42nd Avenue SW as it will have less impact on existing established businesses in the heart of the Junction during construction</p>	<p>Please see response to CCG2 in Table 7.1.</p>
3	<p>We further believe the DEIS currently represents inadequate study of cumulative impacts, and provides insufficient mitigation information, in several areas including the lack of sufficient information on cumulative impacts of transportation and road closures -- including paths of temporary and permanent-term closures and re-routes -- as well as the lack of sufficient information on separate and cumulative impacts of tunnel routes on the businesses and residents above them</p>	<p>Please see responses to CCG1, CC3c, and CC5a in Table 7-1.</p>

April 27, 2022

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

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

Re: *Comments on West Seattle and Ballard Link Extension (“WSBLE”) Draft Environmental Impact Statement (“DEIS”) for Residential Projects located at 4406 36th Ave S and 4440 Fautleroy Way SW.*

Dear Ms. Swift:

We represent the owners of the “Alki Lumber” property, which is historically owned by the Sweeney Family. This is an assemblage generally located at 4406 36th Avenue South (“East Block”) and 4440 Fautleroy Way Southwest (“West Block”).<sup>1</sup> Both Blocks of the Sweeney Property are currently being redeveloped (together, the “Sweeney Blocks Project”). When completed, the Sweeney Blocks Project will provide over 500 new transit-oriented residences and a new retail core along 36th street, where an unusually wide right-of-way provides ample opportunity for creative sidewalk use and retail spill-out for community engagement. But perhaps most exciting is that the completed Sweeney Blocks Project will continue to provide a heritage retail location for Alki Lumber itself: a community business that has been providing excellent service and jobs in West Seattle for over 100 years.

Notably, design and permitting for both Blocks has progressed significantly since May 2021 (the benchmark date the Draft Environmental Impact Statement (“DEIS”) uses to evaluate future projects). See Appendix K. The design review process is complete, and the Master Use Permits could be issued in the next few months under permit nos. 3035684-LU (East Block) and 3035693-LU (West Block). The projects would likely be constructed prior to the anticipated start date for WSBLE construction in 2026.

We believe the transit-oriented Sweeney Blocks Project will compliment an adjacent WSBLE Avalon Station by providing a dense community of residents and businesses who will be users of the Station on its first day of fare service, however, we are concerned with the level of disclosure of impacts in the WSBLE DEIS. There are current oversights in the DEIS document that could create unintended consequences for Sound Transit, the Sweeney Blocks Project, and the West Seattle Triangle neighborhood if not addressed in the Final EIS (“FEIS”). *As it completes the FEIS, Sound Transit should take a hard look at the additional identified potential impacts and areas for additional study noted below, and especially at the troubling identified impacts of preferred alternative WSJ-1.* We appreciate the opportunity to comment on Sound Transit’s WSBLE DEIS, and we look forward to working with Sound Transit in the years to come to make the WSBLE a reality.

---

<sup>1</sup> The Alki Lumber Property’s East Block is comprised of tax parcel nos. 0952004465, 0952004475, 0952004494, 0952004495 and 0952004525. The Alki Lumber Property’s West Block is comprised of tax parcel nos. 0952004355 and 0952004340.

**A. Direct Project Impacts of WSBLE Alternatives**

**1. WSJ-1 Impacts on the Sweeney Blocks Project are Significant**

Based on information provided by Sound Transit, construction of WSJ-1 would require construction staging and laydown space on approximately one-third of the West Block property. This construction staging area will directly conflict with the planned building area for the West Block project that may be constructed prior to the start of WSBLE construction. Sound Transit should reevaluate its construction staging plans to avoid all of the West Block property and the associated disruption and demolition of several hundred newly constructed residences.

Further, construction laydown area under this alternative ostensibly will result in access restrictions on SW Avalon Way and the alleys that provide access for both Blocks. It also appears that the straddle bent placement proposed in WSJ-1 would require permanent blockage of the alley adjacent to the West Block that connects Fauntleroy Way SW and SW Oregon Street. This alley is not only used for future access to the West Block's 150 residential vehicle parking spaces, 179 bicycle parking spaces, and three loading berths, but is used for access to neighboring businesses. City policies require vehicle access from the alley, so it is not possible to relocate the West Block's access from 36th, and even if it were allowed, doing so would require substantial and costly redesign. The FEIS must provide additional study of the impacts of these temporary and permanent access limitations. Sound Transit's motorized, non-motorized and freight mobility and circulation studies all appear to fail to account for or study the increased use of the Blocks and the alleys that will be catalyzed by the Sweeney Blocks Project. Sound Transit should also identify in the FEIS alternative construction staging areas and means and methods to ensure full vehicle access is maintained to the buildings or identify adequate mitigation measures like full compensation for building owners who suffer economic impacts from lost parking and tenant revenue because of construction and operational access impacts.

**2. Potential WSJ-2 Construction Impacts are also Significant**

The construction staging area for WSJ-2 appears to similarly conflict with the alley access for the East Block from Avalon. This alley connects SW Avalon Way with SW Oregon Street between 35th and 36th Avenues Southwest and provides vehicle, bicycle, and loading access to the East Block's below-grade garage for 158 residential and five non-residential vehicle parking spaces, 24 short term and 226 long term bicycle parking spaces, a commercial truck berth, and areas for residential and commercial refuse and recycling. It also provides an important neighborhood pedestrian through-block connection from Avalon to Oregon, and is used for access to the vehicular garage, waste, and loading areas for the neighboring Aura Apartments at 4435 35th Ave SW. Access to this alley must be maintained or the FEIS must fully disclose the impacts from potential closure of this alley, identify alternative construction staging area, and provide a plan for maintaining full access or other appropriate mitigation measures.

**3. Flow Control Vault Placement under WSJ-3a**

As a general matter, we believe that WSJ-3a is well-designed alternative that has the best Junction station location and less impacts on neighborhood cohesion. However, there are potential impacts and issues related to WSJ-3a's proposed flow control vault location on the East Block.

We presume that installation and maintenance of this vault would require temporary closures to SW Avalon Way at 36th Avenue SW. It appears that such closures would block the alley adjacent to

the East Block. Similar to the alley access concerns discussed in the previous section, alley blockage will impede ingress and egress for East Block vehicles and alley access must be maintained. The DEIS' motorized, non-motorized and freight mobility and circulation studies again fail to account for or study the increased use of this alley that will be catalyzed by the Sweeney Blocks Project and the impacts of disruption.

In addition, if shoring is required for this vault, such shoring could cause blockage to a very important aspect of the Sweeney Blocks Project: the new long-term retail home of Alki Lumber itself. This surface-level impact of flow control vault installation are not examined or discussed in any detail in the DEIS and additional analysis. See DEIS Section 4.2.4.4.5.

Of course, if this flow control vault required *permanent* disruption or change to this alley or the adjacent residential and commercial spaces, it would have a substantial impact on the East Block and its neighbor the Aura Apartments. Sound Transit should account for these risks and impacts as the design process moves forward and design to avoid them. We believe the vault placement options in WSJ-4 would cause dramatically less disruption than the placement proposed in WSJ-3a. The vault placements proposed in WSJ-3b and WSJ-5 could still cause some disruptions, but would be better than the vault location in WSJ-3a. For this reason, that flow control vault location should be further engineered and potentially relocated. Ultimately, all vaults should be located and designed to have the least impacts possible on existing surrounding development.

#### **B. Preferred Alternative**

The WSBLE DEIS identified four preferred alternatives for the West Seattle Junction Segment – WSJ-1, WSJ-2, WSJ-3a, and WSJ-3b. There are two other alternatives – WSJ-4 and WSJ-5 that are not preferred. Of the preferred alternatives, tunnel alternative WSJ-3a should be advanced as the final preferred alternative adopted by the Sound Transit Board even though it requires outside funding. This alternative reduces the issues with neighborhood cohesion and displacement compared to the above-grade alternatives, and the future station option on 41st Avenue SW is a better location compared to 42nd Avenue SW as it will have less impact on existing established businesses in the heart of the Junction during construction. Compared to the elevated station options in WSJ-1 and WSJ-2, the WSJ-3a location is far superior in terms of serving, but not significantly impacting our neighborhood. Although we strongly support WSJ-3a as the preferred alternative, there are a few modifications and design refinements warranted to avoid significant impacts like relocation of the flow control vault.

#### **C. Traffic Impacts and Related Displacement Impacts.**

Sound Transit should provide special attention and additional mitigation measures for transportation impacts in West Seattle, as this area has already been significantly impacted by the West Seattle Bridge closure. The FEIS should study traffic and displacement impacts from the WSBLE cumulatively with and in the context of the multi-year Bridge closure. There are also several likely significant adverse impacts that would result from proposed WSBLE alternative WSJ-1 and WSJ-2 that have not been sufficiently considered and discussed in the DEIS, as described further below.

##### **1. Boulevard & Bike Lane Impacts of WSJ-1 and WSJ-2.**

The DEIS is far too superficial in its analysis of the circulation impacts of WSJ-1 (and to a lesser extent, WSJ-2) on Fauntleroy and Avalon for bicycle, automotive and pedestrian traffic. In fact, it

contains no explicit discussion of access and circulation impacts in the West Seattle Triangle, instead starting and ending its analysis with a confusing statement that “[t]here are no substantial proposed roadway modifications with preferred WSJ-1,” and no built roadway revisions other than a new median under WSJ-2. DEIS Section 3.5.3.1.4. This does not square with the DEIS’ illustrations of columns interfering with alley ingress and egress, nor with its statements that “roadway modifications may be needed to accommodate columns . . . within the roadway or modifications to the street network.” DEIS Section 3.5.3.1.

Based on the illustrations, it is not clear how Sound Transit reached the conclusion that WSJ-1 and WSJ-2 will not impair access and circulation to Fauntleroy and Avalon for motor traffic, bicycles, and general boulevard traffic. This is perhaps the most concerning potential adverse transportation impact of these alternatives for general mobility, circulation, and traffic in the West Seattle Triangle neighborhood. The Sweeney Property (before or after completion of the Sweeney Blocks Project) would appear to be severely disrupted by the proposed WSJ-1 guideway route. This proposed route and straddle bent placement would substantially impair access to the Sweeney Blocks Project’s proposed community market hall and outdoor amenity areas, but these impacts are not specific to the Sweeney Blocks Project alone. On further inquiry, Sound Transit will find many neighboring businesses, residents and property owners have equally grave concerns about WSJ-1 hampering impacts to their own respective storefronts and outdoor areas. These impacts would not only delay and inconvenience residents, commuters and intra-neighborhood commerce, but would result in displacement (or closure) of neighborhood businesses by discouraging patrons from visiting the neighborhood and disrupting deliveries.

Similarly concerning analytical shortcomings are present with respect to traffic safety. *See* DEIS Section 3.8.3.5. In this area, the DEIS relies on a conclusory assumption that because guideway columns and straddle bents would “adhere to roadway standards” and “be outside of the vehicle travel lanes,” it would result in “little to no impact on safety.” This does not explain how the introduction of additional noise, light, shadow and movement into an already busy corridor will be adequately mitigated to avoid distraction and disruption to drivers, pedestrians and bicyclists alike. This shortcoming is emphasized by confusing statements that the tunnel alternatives “would have similar transportation safety conditions to [WSJ-1],” even though these tunnel alternatives “would not have any columns or other physical roadway impacts.” *Id.* It does not logically follow that alternatives with dramatically fewer roadway-area elements would have no substantial reduction in safety risk. A more detailed study of safety impacts should be included in the FEIS.

## **2. General Traffic-Related Business Displacements.**

In West Seattle, as in other segments of the WSBLE, adverse transportation impacts will go hand-in-hand with business displacement impacts, because businesses will be displaced--or will close altogether--if their customers cannot reach them efficiently. The DEIS apparently relies on the assumption that the only business displacements that will occur are those caused by Sound Transit’s direct occupation of a business’ space. The businesses that will be affected by displacement of customers and access routes are apparently not analyzed. DEIS Sections 4.2.1.3.4 and 4.2.3.3.5. Indirect business displacement impacts should also be considered in the FEIS. Further, if Sound Transit chooses an above-ground route in this segment, we believe WSJ-2 is immensely better than WSJ-1 in terms of both general transportation disruption and resulting displacement of neighborhood businesses.



**D. *Adverse Impacts to Aesthetics, Noise, Vibration and Neighborhood Cohesion.***

Alternative WSJ-1 would also be substantially more adverse than WSJ-2 in terms of aesthetic, noise, vibration and neighborhood cohesion impacts on the Sweeney Blocks Project and the West Seattle Triangle neighborhood. Even to any extent that the support columns of WSJ-1 would not impair circulation and access for other transportation modes (which is debatable, as discussed in A.1 above), WSJ-1's guideway *itself* would literally cast a shadow over this vibrant neighborhood's sidewalk users, bicycles and neighborhood businesses. This route would further discourage and disappoint these users by introducing substantial noise and vibration impacts on this vibrant developing boulevard and its bike lanes. As between the two above-ground alternatives, WSJ-2 would be immensely preferable for the Sweeney Blocks Property and our neighbors, as well as our future residents and business tenants.

The DEIS nods to these types of impacts at Section 4.2.4.3.5 (though without specific reference to light, shadow, noise or vibration) where it conclusively states that "WSJ-1 and WSJ-2 would have the most impact on the community because the guideway would be entirely elevated and primarily outside of public right of way." Other than acknowledging the "most impact" and "visual impact on the surrounding neighborhood," the scope, scale or specific types of these impacts are not studied or discussed.

The DEIS' analysis of visual and aesthetic resources is similarly insufficient to allow for a full understanding of potential impacts. It does not analyze the Sweeney Blocks Project's soon-to-be residents and customers as "sensitive viewers." See Figure 4.2.5-11. Similarly, though the DEIS acknowledges Fauntleroy's status as a City of Seattle Designated Scenic Route, *id.*, it does not describe where or to what extent this vibrant community asset will lose views to the Cascade Mountains, Elliott Bay, and the Downtown Seattle skyline," from the route. DEIS Section 4.2.5.1. The effect of lost views on such a vibrant community and shopping corridor should be analyzed, but they are not. In some troubling instances, they are explained away. For example, the last full paragraph on DEIS Page 4.2.5-19 appears to assume that the permanent removal of a public viewing location results in no impact in access to public views. This is undoubtedly a view impact. In fact, it is one of the most important types of view impacts, because it is an impact on views equitably available to all community members. Fauntleroy Place provides a restful public park bench that provides neighborhood walkers and bikers with rest, people-watching and colorful foliage viewing. Its removal is an impact that should be acknowledged and further detail provided on how the park and users experience will change.

**E. *Potential Tieback or Shoring Encroachments.***

It also appears that WSBLE alternatives WSJ-3a, WSJ-3b, WSJ-4 and WSJ-5 may require tiebacks or shoring that would encroach into the Sweeney Blocks Project. However, the extent and effects of such engineering elements are provided in detail in the DEIS, nor can we glean them based on the DEIS' limited information on tunnel depths or engineering methods. While the Sweeney Blocks Project supports the tunnel alternatives, we request further information about any plans for related tiebacks or shoring (or other encroaching elements of the WSBLE) on the Sweeney Property as soon as possible, so that we can coordinate with Sound Transit in design and construction of these elements. These additional details are missing from the DEIS and should be incorporated in the final to fully evaluate impacts to the existing and future built environment.

We know that Sound Transit has many adjoining property owners with whom it aspires to coordinate and serve as a good neighbor. However, advance coordination is particularly warranted in this instance, due to the current stage of the Sweeney Blocks Project's development. Once permits for Sweeney Blocks Project has been issued and construction begun, the expense and complication of encroaching WSBLE tiebacks will increase dramatically. *The window is closing to have effective coordination discussions and avoid additional costs and headaches for Sound Transit.* We hope Sound Transit will coordinate with us at the earliest possible stage of WSJ-area design and construction.

**F. Overall DEIS Sufficiency Concerns.**

We recognize that any final WSBLE route will result in significant impacts on multiple Seattle neighborhoods, and some impacts will be adverse. We appreciate Sound Transit's work to analyze potential impacts, but we believe the DEIS currently represents inadequate study of cumulative impacts, and provides insufficient mitigation information, in several areas. These include:

- Lack of sufficient information on cumulative impacts of transportation and road closures, including paths of temporary and permanent-term closures and re-routes. Access must be maintained to existing residences at all times, and it is not clear that this will occur.
- Lack of sufficient information on separate and cumulative construction impacts, including construction-period vibration, noise, dust, lighting and the like, as well as the proposed sequencing of work.
- Lack of sufficient information on separate and cumulative impacts of tunnel routes on the businesses and residents above them.

The scope of these impacts, and many others, remain a mystery to neighborhood stakeholders in a troubling number of instances. As a critical example, the Sweeney Blocks Project is unable to tell from the DEIS whether some (or all) of the tunnel alternatives would require geotechnical or civil engineering elements that would impact the Sweeney Blocks Project's underground garage. Without further information on the scope of those engineering elements, we cannot provide proper input on the scope of the resulting impacts on our garages, and by extension, on whether the Sweeney Blocks Project will be significantly impacted during the construction and operation of the WSBLE.

**G. Conclusion.**

We believe the Sweeney Blocks Project's dense, transit-oriented community of residences and retail at will be ready to complement the Sound Transit's Avalon Station on the first day of fare service. For that reason, we hope that early coordination will enable the Sweeney Blocks Project and WSBLE to each consider the other a good neighbor during design, construction and long-term operation. Thank you for considering these comments.

Sincerely,

Lynn Sweeney, Sweeney Family

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504341 – Alki Lumber, Lynn Sweeney Draft EIS Comment**

#	Comments	Responses
1	<p>WSJ-1 Impacts on the Sweeney Blocks Project are Significant Based on information provided by Sound Transit, construction of WSJ-1 would require construction staging and laydown space on approximately one-third of the West Block property. This construction staging area will directly conflict with the planned building area for the West Block project that may be constructed prior to the start of WSBLE construction. Sound Transit should reevaluate its construction staging plans to avoid all of the West Block property and the associated disruption and demolition of several hundred newly constructed residences. Further, construction laydown area under this alternative ostensibly will result in access restrictions on SW Avalon Way and the alleys that provide access for both Blocks. It also appears that the straddle bent placement proposed in WSJ-1 would require permanent blockage of the alley adjacent to the West Block that connects Fauntleroy Way SW and SW Oregon Street. This alley is not only used for future access to the West Block's 150 residential vehicle parking spaces, 179 bicycle parking spaces, and three loading berths, but is used for access to neighboring businesses. City policies require vehicle access from the alley, so it is not possible to relocate the West Block's access from 36th, and even if it were allowed, doing so would require substantial and costly redesign. The FEIS must provide additional study of the impacts of these temporary and permanent access limitations. Sound Transit's motorized, non- motorized and freight mobility and circulation studies all appear to fail to account for or study the increased use of the Blocks and the alleys that will be catalyzed by the Sweeney Blocks Project. Sound Transit should also identify in the FEIS alternative construction staging areas and means and methods to ensure full vehicle access is maintained to the buildings or identify adequate mitigation measures like full compensation for building owners who suffer economic impacts from lost parking and tenant revenue because of construction and operational access impacts.</p>	<p>Please see responses to CCG1, CCG2, and CC4.1b in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. If Alternative WSJ-1 is selected as the project to be built, Sound Transit would coordinate with you on impacts to your planned development.</p>
2	<p>Potential WSJ-2 Construction Impacts are also Significant The construction staging area for WSJ- 2 appears to similarly conflict with the alley access for the East Block from Avalon. This alley connects SW Avalon Way with SW Oregon Street between 35th and 36th Avenues Southwest and provides vehicle, bicycle, and loading access to the East Block's below-grade garage for 158 residential and five non-residential vehicle parking spaces, 24 short term and 226 long term bicycle parking spaces, a commercial truck berth, and areas for residential and commercial refuse and recycling. It also provides an important neighborhood pedestrian through-block connection from Avalon to Oregon, and is used for access to the vehicular garage, waste, and loading areas for the neighboring Aura Apartments at 4435 35th Ave SW. Access to this alley must be maintained or the FEIS must fully disclose the impacts from potential closure of this alley, identify alternative construction staging area, and provide a plan for maintaining full access or other appropriate mitigation measures.</p>	<p>Please see responses to CCG1 and CCG2 in Table 7-1. If Alternative WSJ-2 is selected as the project to be built, Sound Transit would coordinate with you on impacts to your planned development.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
3	<p>As a general matter, we believe that WSJ-3a is well-designed alternative that has the best Junction station location and less impacts on neighborhood cohesion. However, there are potential impacts and issues related to WSJ-3a's proposed flow control vault location on the East Block. We presume that installation and maintenance of this vault would require temporary closures to SW Avalon Way at 36th Avenue SW. It appears that such closures would block the alley adjacent to the East Block. Similar to the alley access concerns discussed in the previous section, alley blockage will impede ingress and egress for East Block vehicles and alley access must be maintained. The DEIS' motorized, non-motorized and freight mobility and circulation studies again fail to account for or study the increased use of this alley that will be catalyzed by the Sweeney Blocks Project and the impacts of disruption. In addition, if shoring is required for this vault, such shoring could cause blockage to a very important aspect of the Sweeney Blocks Project: the new long-term retail home of Alki Lumber itself. This surface-level impact of flow control vault installation are not examined or discussed in any detail in the DEIS and additional analys. See DEIS Section 4.2.4.4.5. Of course, if this flow control vault required permanent disruption or change to this alley or the adjacent residential and commercial spaces, it would have a substantial impact on the East Block and its neighbor the Aura Apartments. Sound Transit should account for these risks and impacts as the design process moves forward and design to avoid them. We believe the vault placement options in WSJ-4 would cause dramatically less disruption than the placement proposed in WSJ-3a. The vault placements proposed in WSJ-3b and WSJ-5 could still cause some disruptions, but would be better than the vault location in WSJ- 3a. For this reason, that flow control vault location should be further engineered and potentially relocated. Ultimately, all vaults should be located and designed to have the least impacts possible on existing surrounding development.</p>	<p>Please see response to comment 1, above.</p>
4	<p>The WSBLE DEIS identified four preferred alternatives for the West Seattle Junction Segment - WSJ-1, WSJ-2, WSJ-3a, and WSJ-3b. There are two other alternatives - WSJ-4 and WSJ-5 that are not preferred. Of the preferred alternatives, tunnel alternative WSJ-3a should be advanced as the final preferred alternative adopted by the Sound Transit Board even though it requires outside funding. This alternative reduces the issues with neighborhood cohesion and displacement compared to the above-grade alternatives, and the future station option on 41st Avenue SW is a better location compared to 42nd Avenue SW as it will have less impact on existing established businesses in the heart of the Junction during construction. Compared to the elevated station options in WSJ-1 and WSJ-2, the WSJ-3a location is far superior in terms of serving, but not significantly impacting our neighborhood. Although we strongly support WSJ-3a as the preferred alternative, there are a few modifications and design refinements warranted to avoid significant impacts like relocation of the flow control vault.</p>	<p>Please see response to CCG2 in Table 7-1. If Alternative WSJ-3a is selected as the project to be built, Sound Transit would coordinate with you on potential impacts to your property.</p>
5	<p>Sound Transit should provide special attention and additional mitigation measures for transportation impacts in West Seattle, as this area has already been significantly impacted by the West Seattle Bridge closure. The FEIS should study traffic and displacement impacts from the WSBLE cumulatively with and in the context of the multi-year Bridge closure.</p>	<p>Please see response to CC5b in Table 7-1.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
6	<p>The DEIS is far too superficial in its analysis of the circulation impacts of WSJ-1 (and to a lesser extent, WSJ-2) on Fauntleroy and Avalon for bicycle, automotive and pedestrian traffic. In fact, it contains no explicit discussion of access and circulation impacts in the West Seattle Triangle, instead starting and ending its analysis with a confusing statement that "[!]here are no substantial proposed roadway modifications with preferred WSJ-1," and no built roadway revisions other than a new median under WSJ-2. DEIS Section 3.5.3.1.4. This does not square with the DEIS' illustrations of columns interfering with alley ingress and egress, nor with its statements that "roadway modifications may be needed to accommodate columns ... within the roadway or modifications to the street network." DEIS Section 3.5.3.1. Based on the illustrations, it is not clear how Sound Transit reached the conclusion that WSJ-1 and WSJ-2 will not impair access and circulation to Fauntleroy and Avalon for motor traffic, bicycles, and general boulevard traffic. This is perhaps the most concerning potential adverse transportation impact of these alternatives for general mobility, circulation, and traffic in the West Seattle Triangle neighborhood. The Sweeney Property (before or after completion of the Sweeney Blocks Project) would appear to be severely disrupted by the proposed WSJ-1 guideway route. This proposed route and straddle bent placement would substantially impair access to the Sweeney Blocks Project's proposed community market hall and outdoor amenity areas, but these impacts are not specific to the Sweeney Blocks Project alone. On further inquiry, Sound Transit will find many neighboring businesses, residents and property owners have equally grave concerns about WSJ-1 hampering impacts to their own respective storefronts and outdoor areas. These impacts would not only delay and inconvenience residents, commuters and intra-neighborhood commerce, but would result in displacement (or closure) of neighborhood businesses by discouraging patrons from visiting the neighborhood and disrupting deliveries.</p>	<p>Please see Chapter 3, Transportation Environment and Consequences, of the Final EIS for updated information on bike, pedestrian, and traffic impacts and Section 4.3, Economics, for information on impacts to businesses.</p>
7	<p>Similarly concerning analytical shortcomings are present with respect to traffic safety. See DEIS Section 3.8.3.5. In this area, the DEIS relies on a conclusory assumption that because guideway columns and straddle bents would "adhere to roadway standards" and "be outside of the vehicle travel lanes," it would result in "little to no impact on safety." This does not explain how the introduction of additional noise, light, shadow and movement into an already busy corridor will be adequately mitigated to avoid distraction and disruption to drivers, pedestrians and bicyclists alike. This shortcoming is emphasized by confusing statements that the tunnel alternatives "would have similar transportation safety conditions to [WSJ-1]," even though these tunnel alternatives "would not have any columns or other physical roadway impacts." Id. It does not logically follow that alternatives with dramatically fewer roadway-area elements would have no substantial reduction in safety risk. A more detailed study of safety impacts should be included in the FEIS.</p>	<p>Please see Appendix N.1 Transportation Technical Report, Chapter 7, of the Final EIS for additional safety analysis.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
8	<p>In West Seattle, as in other segments of the WSBLE, adverse transportation impacts will go hand-in-hand with business displacement impacts, because businesses will be displaced--or will close altogether--if their customers cannot reach them efficiently. The DEIS apparently relies on the assumption that the only business displacements that will occur are those caused by Sound Transit's direct occupation of a business' space. The businesses that will be affected by displacement of customers and access routes are apparently not analyzed. DEIS Sections 4.2.1.3.4 and 4.2.3.3.5. Indirect business displacement impacts should also be considered in the FEIS. Further, if Sound Transit chooses an above-ground route in this segment, we believe WSJ-2 is immensely better than WSJ-1 in terms of both general transportation disruption and resulting displacement of neighborhood businesses.</p>	<p>Please see response to CC3d in Table 7-1. Please see Section 4.3, Economics, of the Final EIS for information related to direct and indirect impacts to businesses during operations and construction, as well as proposed mitigation.</p>
9	<p>Alternative WSJ-1 would also be substantially more adverse than WSJ-2 in terms of aesthetic, noise, vibration and neighborhood cohesion impacts on the Sweeney Blocks Project and the West Seattle Triangle neighborhood. Even to any extent that the support columns of WSJ-1 would not impair circulation and access for other transportation modes (which is debatable, as discussed in A.1 above), WSJ-1's guideway itself would literally cast a shadow over this vibrant neighborhood's sidewalk users, bicycles and neighborhood businesses. This route would further discourage and disappoint these users by introducing substantial noise and vibration impacts on this vibrant developing boulevard and its bike lanes. As between the two above-ground alternatives, WSJ-2 would be immensely preferable for the Sweeney Blocks Property and our neighbors, as well as our future residents and business tenants. The DEIS nods to these types of impacts at Section 4.2.4.3.5 (though without specific reference to light, shadow, noise or vibration) where it conclusively states that "WSJ-1 and WSJ-2 would have the most impact on the community because the guideway would be entirely elevated and primarily outside of public right of way." Other than acknowledging the "most impact" and "visual impact on the surrounding neighborhood," the scope, scale or specific types of these impacts are not studied or discussed.</p>	<p>Please see responses to CC4.4a, CC4.5a, and CC4.7a in Table 7-1.</p>
10	<p>The DEIS' analysis of visual and aesthetic resources is similarly insufficient to allow for a full understanding of potential impacts. It does not analyze the Sweeney Blocks Project's soon-to-be residents and customers as "sensitive viewers." See Figure 4.2.5-11. Similarly, though the DEIS acknowledges Fauntleroy's status as a City of Seattle Designated Scenic Route, id., it does not describe where or to what extent this vibrant community asset will lose views to the Cascade Mountains, Elliott Bay, and the Downtown Seattle skyline," from the route. DEIS Section 4.2.5.1. The effect of lost views on such a vibrant community and shopping corridor should be analyzed, but they are not. In some troubling instances, they are explained away. For example, the last full paragraph on DEIS Page 4.2.5-19 appears to assume that the permanent removal of a public viewing location results in no impact in access to public views. This is undoubtedly a view impact. In fact, it is one of the most important types of view impacts, because it is an impact on views equitably available to all community members. Fauntleroy Place provides a restful public park bench that provides neighborhood walkers and bikers with rest, people-watching and colorful foliage viewing. Its removal is an impact that should be acknowledged and further detail provided on how the park and users experience will change.</p>	<p>Please see Section 4.5, Visual and Aesthetic Resources, of the of the Final EIS for information on visual impacts, including potential impacts to designated scenic routes and proposed mitigation. Consistent with analysis methods, impacts can only be assessed for existing development or development under construction. See Section 4.2, Land Use, for information related to land use impacts and future land uses. See Section 4.17, Parks and Recreational Resources, for information related to park impacts.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
11	<p>It also appears that WSBLE alternatives WSJ-3a, WSJ-3b, WSJ-4 and WSJ-5 may require tiebacks or shoring that would encroach into the Sweeney Blocks Project. However, the extent and effects of such engineering elements are provided in detail in the DEIS, nor can we glean them based on the DEIS' limited information on tunnel depths or engineering methods. While the Sweeney Blocks Project supports the tunnel alternatives, we request further information about any plans for related tiebacks or shoring (or other encroaching elements of the WSBLE) on the Sweeney Property as soon as possible, so that we can coordinate with Sound Transit in design and construction of these elements. These additional details are missing from the DEIS and should be incorporated in the final to fully evaluate impacts to the existing and future built environment. We know that Sound Transit has many adjoining property owners with whom it aspires to coordinate and serve as a good neighbor. However, advance coordination is particularly warranted in this instance, due to the current stage of the Sweeney Blocks Project's development. Once permits for Sweeney Blocks Project has been issued and construction begun, the expense and complication of encroaching WSBLE tiebacks will increase dramatically. The window is closing to have effective coordination discussions and avoid additional costs and headaches for Sound Transit. We hope Sound Transit will coordinate with us at the earliest possible stage of WSJ-area design and construction.</p>	<p>Please see Appendix J, Conceptual Design Drawings, of the Final EIS for more detail on project elements and locations for all Final EIS alternatives, including Preferred Option WSJ-5b. Sound Transit will continue to evaluate easements potentially needed from adjacent property owners as design advances, and coordinate with adjacent property owners as needed.</p>
12	<p>We appreciate Sound Transit's work to analyze potential impacts, but we believe the DEIS currently represents inadequate study of cumulative impacts, and provides insufficient mitigation information, in several areas. These include: • Lack of sufficient information on cumulative impacts of transportation and road closures, including paths of temporary and permanent-term closures and re-routes. Access must be maintained to existing residences at all times, and it is not clear that this will occur. • Lack of sufficient information on separate and cumulative construction impacts, including construction-period vibration, noise, dust, lighting and the like, as well as the proposed sequencing of work. • Lack of sufficient information on separate and cumulative impacts of tunnel routes on the businesses and residents above them.</p>	<p>Please see responses to CCG1, CC3c, CC3d, and CC5a in Table 7-1. Sound Transit will continue to coordinate with affected property owners and adjacent property owners as the project advances.</p>
13	<p>We believe the Sweeney Blocks Project's dense, transit-oriented community of residences and retail at will be ready to complement the Sound Transit's Avalon Station on the first day of fare service. For that reason, we hope that early coordination will enable the Sweeney Blocks Project and WSBLE to each consider the other a good neighbor during design, construction and long-term operation. Thank you for considering these comments.</p>	<p>Sound Transit will continue to coordinate with affected property owners and adjacent property owners as the project advances.</p>

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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.

Ms. Lauren Smith  
April 28, 2022  
Page 2

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 Schrappe". The signature is fluid and cursive, with a large initial "P".

Peter Schrappe  
Vice President – Pacific Region

## Appendix O. Draft EIS Comment Summary and Response to Comments

### Communication ID: 504395 - American Waterways Operators Draft EIS Comment

#	Comments	Responses
1	<p>AWO has serious concerns about the bridge alternatives for the Interbay/Ballard segment of the WBSLE as outlined on pages 38 &amp; 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).</p> <p>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. The proposed alternatives would also cause undue harm to communities in Alaska that depend on barge transportation for essential goods like food and fuel.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
2	<p>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.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
3	<p>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.</p>	<p>Please see response to comment 1, above.</p>
4	<p>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.</p>	<p>Additional discussion of impacts to maritime businesses and freight in the Duwamish Waterway area has been added to Section 4.3, Economics, of the Final EIS. A response to this comment related to the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.</p>

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WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift

Sound Transit

401 S Jackson St

Seattle, WA 98104

Cc:

Tammy J. Morales  
District 2 Councilmember  
South Seattle, Chinatown /  
International District  
PO Box 34025  
Seattle, WA 98124-4025  
[Tammy.Morales@seattle.gov](mailto:Tammy.Morales@seattle.gov)

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Sara Nelson  
Citywide Councilmember  
PO Box 34025  
Seattle, WA 98124-4025  
[Sara.Nelson@seattle.gov](mailto:Sara.Nelson@seattle.gov)

February 9, 2022

Dear Councilmembers and Sound Transit

We recently received a letter from Sound Transit notifying us that our SODO office/showroom/workshop may be in the route of the West Seattle Link Extension. After reading the Draft EIS, it appears that our location may be on the route of both the Preferred Alternative DUW-1a and Option DUW-1b, though not on the DUW-2 route. We ask your assistance in mitigating this in any way possible. It appears that each of the routes could be re-routed slightly to the north or south of our property so as not to require us to relinquish our building to Sound Transit and be forced to move again. Having just moved to this location in 2021 after purchasing the property in 2020, we fear that our business is unlikely to survive another move at this time – even more so given the difficult economic times created by Covid19.

Who we are:

- BladeGallery Inc has several arms that are run out of our SODO workshop.
  - Our 2200 sqft showroom displays a wide selection of handmade and production knives, including chef's knives, straight razors, and manicure gear.
  - We offer a world class sharpening service – knives are regularly sent to us for sharpening and repair from as far away as New Zealand, Australia, and Japan, as well as from around the US. We provide sharpening and repair services for a large portion of chefs in the Pacific Northwest.
  - We have a 6500 sqft custom knifemaking forge and teaching studio.
  - We house 1400 sqft of temperature and humidity controlled warehousing for our products, many of which are literally one-of-a-kind in the world and utilize some of the rarest materials found anywhere.
  - We teach classes aimed at established knifemakers and beginners. As we are developing our curriculum, we are gearing classes toward youth as well as providing scholarships for low income students, adding to the vibrant Pacific Northwest knifemaking community.



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- We are developing a resident artist program where 1-2 resident artists are supported in their work and studies to further develop their creativity and skills.
- BladeGallery Inc is a small business that supports 7 employee households and we anticipate hiring two additional employees in the next year.
- Our business supports over 600 artisans from around the world, custom building knives. In many cases, we are these artists' primary sales mechanism.
- Our showroom draws customers to the greater Seattle area to visit -- not only do customers visit our business from Everett, Bellingham, and Vancouver to the north, Renton and Tukwilla to the South, and Bellevue, Redmond and Kirkland to the East, but customers regularly fly to Seattle to visit our showroom from international and distant US locations. This influx of customers to the greater Seattle area is beneficial to the Seattle tax base.

We spent three years searching for the correct location for our multi-pronged business. After purchasing our new storefront in the spring of 2020, we moved from Kirkland (where we have been since 2003) back to Seattle in the fall of 2021. After two years of renovations, we finally received our final Certificate of Occupancy this last month.

It has been a difficult and expensive move. The move has taken two years and we will still be finalizing renovations for at least the next year. We have transformed our 1924 warehouse into a refined location showing the workmanship of the past, retaining the feel of this historic building (including its massive old growth beams!). These renovations, as well as a mural across the entire front of the building by renowned Seattle artist Henry Ward, has transformed this tired warehouse into a flagship showing the promise of the Seattle SODO neighborhood. Moving and cataloging our extensive and fragile inventory has been quite an undertaking (much of our inventory needs temperature and humidity control).

- Covid19 led to significant cost increases in renovation materials, difficulties and delays, and unavoidable adjustments to our plans
- City of Seattle required many expensive modifications including
  - ADA considerations (Multiple handicapped wheelchair access ramps, ADA bathrooms, etc)
  - Environmental considerations
    - Re-roofing entire 18,000 sqft building to allow for 8 inches of insulation on roof
    - Fire barrier walls with multiple layers of drywall and insulation (especially expensive right now!)
  - Full electric upgrade
  - Engineered high efficiency HVAC system

Our move required an SBA loan as well as a Chase loan. Both of these loans have early payment penalties, which we would encounter if we were forced to move. I have personally had to remortgage my house in Fremont to help cover renovation expenses. Literally, everything in my financial life is at stake.

Being forced to move due to the West Seattle Link Extension would not only have a significant financial impact on our company, our employees and their families, as well as the hundreds of artisan knifemakers that we represent, but it might literally be non-financially-recoverable for our company and me personally. Even if Sound Transit is required to pay 'fair market value' for our property, this doesn't come close to covering the thousands of hours of work and renovation costs, let alone architectural fees, banking fees, etc (none of which have been recovered due to our recent move). Finding a



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replacement building in an appropriate location and of the correct style, paying staff for 2-3 years while renovations are completed, storing our fragile inventory during that time, and finally moving again seems insurmountable.

I greatly appreciate any efforts that you can make to select a path that does not directly force our company to move or close down – which in turn would result in tremendous difficulties for our employees and the hundreds of artisans we represent.

Yours,

Daniel O'Malley  
President, BladeGallery Inc  
Manager, Red Wall LLC

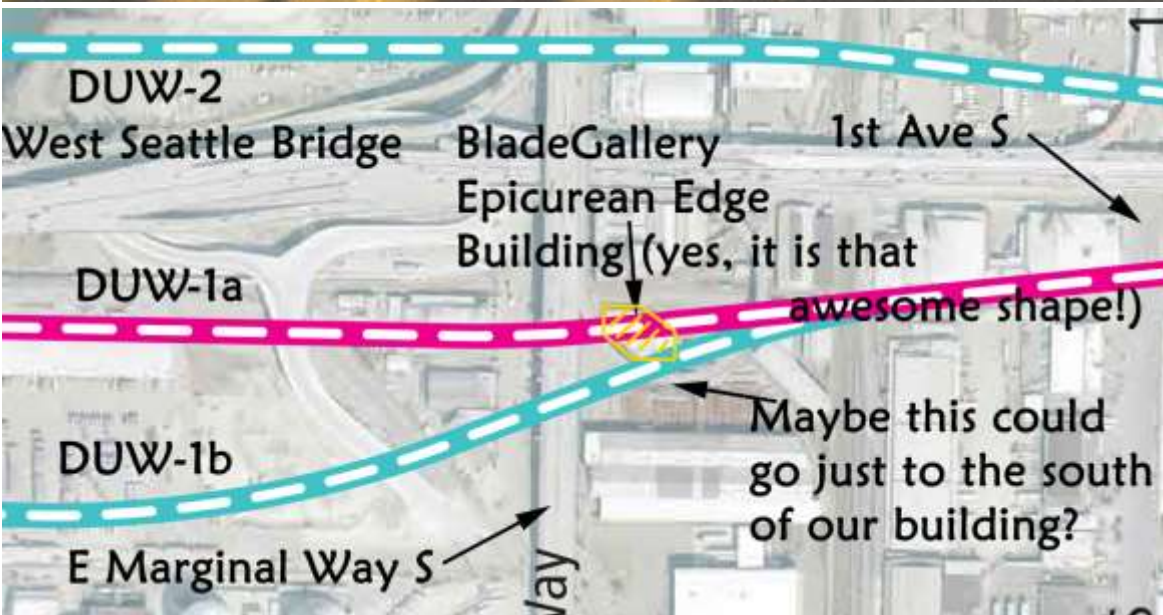
Home address:

4338 Evanston Ave N  
Seattle, WA 98103

Direct email: [omalley@bladegallery.com](mailto:omalley@bladegallery.com)



# BLADEGALLERY.COM





**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 496158 - BladeGallery Draft EIS comment**

#	Comments	Responses
1	<p>After reading the Draft EIS, it appears that our location may be on the route of both the Preferred Alternative DUW-1a and Option DUW-1b, though not on the DUW-2 route. We ask your assistance in mitigating this in any way possible. It appears that each of the routes could be re-routed slightly to the north or south of our property so as not to require us to relinquish our building to Sound Transit and be forced to move again. Having just moved to this location in 2021 after purchasing the property in 2020, we fear that our business is unlikely to survive another move at this time - even more so given the difficult economic times created by Covid19. Who we are: • BladeGallery Inc has several arms that are run out of our SODO workshop. • Our 2200 sqft showroom displays a wide selection of handmade and production knives, including chef's knives, straight razors, and manicure gear. • We offer a world class sharpening service - knives are regularly sent to us for sharpening and repair from as far away as New Zealand, Australia, and Japan, as well as from around the US. We provide sharpening and repair services for a large portion of chefs in the Pacific Northwest. • We have a 6500 sqft custom knifemaking forge and teaching studio. • We house 1400 sqft of temperature and humidity controlled warehousing for our products, many of which are literally one-of-a-kind in the world and utilize some of the rarest materials found anywhere. • We teach classes aimed at established knifemakers and beginners. As we are developing our curriculum, we are gearing classes toward youth as well as providing scholarships for low income students, adding to the vibrant Pacific Northwest knifemaking community. • We are developing a resident artist program where 1-2 resident artists are supported in their work and studies to further develop their creativity and skills. • BladeGallery Inc is a small business that supports 7 employee households and we anticipate hiring two additional employees in the next year. • Our business supports over 600 artisans from around the world, custom building knives. In many cases, we are these artists' primary sales mechanism. • Our showroom draws customers to the greater Seattle area to visit -- not only do customers visit our business from Everett, Bellingham, and Vancouver to the north, Renton and Tukwilla to the South, and Bellevue, Redmond and Kirkland to the East, but customers regularly fly to Seattle to visit our showroom from international and distant US locations. This influx of customers to the greater Seattle area is beneficial to the Seattle tax base. We spent three years searching for the correct location for our multi-pronged business. After purchasing our new storefront in the spring of 2020, we moved from Kirkland (where we have been since 2003) back to Seattle in the fall of 2021. After two years of renovations, we finally received our final Certificate of Occupancy this last month.</p>	<p>Please see responses to CCG2 and CCG3 in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Please see Section 2.5, Alternatives Development and Scoping, of the Final EIS for more information on the Sound Transit Board Motion. The Sound Transit Board will select the project to be built after the Final EIS is prepared. Due to constraints of existing roadways and railroads surrounding this property, along with requirements for spacing of columns, this property cannot be avoided under Preferred Alternative DUW-1a.</p> <p>Sound Transit acknowledges the inconvenience and hardship of relocating a unique business. Please see the mitigation section in Section 4.1, Acquisitions, Displacements, and Relocations, of the Final EIS for more information on support Sound Transit would provide to help find new homes or sites, solve problems that might occur, and plan for relocation.</p>
2	<p>It has been a difficult and expensive move. The move has taken two years and we will still be finalizing renovations for at least the next year. We have transformed our 1924 warehouse into a refined location showing the workmanship of the past, retaining the feel of this historic building (including its massive old growth beams!). These renovations, as well as a mural across the entire front of the building by renowned Seattle artist Henry Ward, has transformed this tired warehouse into a</p>	<p>Sound Transit acknowledges the inconvenience and hardship of relocating a unique business. Please see the mitigation section in Section 4.1, Acquisitions, Displacements, and Relocations, of the Final EIS for more information on support Sound Transit would provide to help find new homes or</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>flagship showing the promise of the Seattle SODO neighborhood. Moving and cataloging our extensive and fragile inventory has been quite an undertaking (much of our inventory needs temperature and humidity control). • Covid19 led to significant cost increases in renovation materials, difficulties and delays, and unavoidable adjustments to our plans • City of Seattle required many expensive modifications including • ADA considerations (Multiple handicapped wheelchair access ramps, ADA bathrooms, etc) • Environmental considerations§ Re-roofing entire 18,000 sqft building to allow for 8 inches of insulation on roof§ Fire barrier walls with multiple layers of drywall and insulation (especially expensive right now!) • Full electric upgrade • Engineered high efficiency HVAC system Our move required an SBA loan as well as a Chase loan. Both of these loans have early payment penalties, which we would encounter if we were forced to move. I have personally had to remortgage my house in Fremont to help cover renovation expenses. Literally, everything in my financial life is at stake. Being forced to move due to the West Seattle Link Extension would not only have a significant financial impact on our company, our employees and their families, as well as the hundreds of artisan knifemakers that we represent, but it might literally be non-financially-recoverable for our company and me personally. Even if Sound Transit is required to pay 'fair market value' for our property, this doesn't come close to covering the thousands of hours of work and renovation costs, let alone architectural fees, banking fees, etc (none of which have been recovered due to our recent move). Finding a replacement building in an appropriate location and of the correct style, paying staff for 2-3 years while renovations are completed, storing our fragile inventory during that time, and finally moving again seems insurmountable. I greatly appreciate any efforts that you can make to select a path that does not directly force our company to move or close down - which in turn would result in tremendous difficulties for our employees and the hundreds of artisans we represent.</p>	<p>sites, solve problems that might occur, and plan for relocation. The real estate appraisal will account for all improvements to the property, including artwork integrated into the building, at the time the appraisal is completed. Please see responses to CC4.1a and CC4.1d in Table 7-1 in Chapter 7, Comment Summary, of the Final EIS.</p>

## Sound Transit Projects - Communications (1 Total)

### Search Term

502719

### Communication ID: 502719

#### Communication ( 4/28/2022 )

In addition to the comments that I have previously noted in an effort to save BladeGallery's Epicurean Edge from eminent domain, a supporting customer of ours that worked as an environmental executive for the federal government has noted some irregularities in the EIS that I am asking you to specifically address. I hope you hear your specific thoughts on these issues.

These irregularities appear to skew the representation of the data to make the Preferred Alternative DUW-1A appear better than the Alternative DUW-2.

Please consider the following comments on the appropriateness of Alternative DUW-2:

As stated in Paragraph 4.2.2.3.3, Alternative DUW-2 would not convert any single- or multi-family residential land or City-owned open space to a transportation use.

As shown in Table 4.2.3-2 and stated in Paragraph 4.2.3.3.3, Alternative DUW-2 would displace the fewest employees – about 40% fewer than other alternatives.

As stated in Paragraph 4.2.5.3.3, Alternative DUW-2 would have the least change to the visual character in areas with concentrations of sensitive viewers and the least impact on visual quality of all the Duwamish Segment Build Alternatives

As stated in Paragraph 4.2.7.3.2, Alternative DUW-2 would have the fewest noise impacts of all the Duwamish Segment Build Alternatives – about 90% fewer than other alternatives.

As shown in Table 4.2.8-1, Alternative DUW-2 would introduce the least square footage of total new impervious surface by a significant margin – less than 10% that of other alternatives.

As stated in Paragraph 4.2.8.3.3, Alternative DUW-2 would not require relocation of any outfalls.

As shown in Table 4.2.9-2, Alternative DUW-2 would have no effect at all on Alternative Wetlands, Wetland Buffers, and Biodiversity areas.

As stated in Paragraph 4.2.11.3.3, Alternative DUW-2 would avoid the steep slopes on Pigeon Point, offering the greatest slope stability and least landslide risk, thereby avoiding the need to construct retaining structures.

As stated in Paragraph 4.2.14.3.3, Alternative DUW-2 would not be expected to require relocation of Fire Station 14, and no long-term effects are expected.

Table 4.2.16-4 seems to indicate Alternative DUW-2 would impact 9 historic properties, the most of any alternative. However, the table inexplicably divides the Department of Highways District No. 1 Headquarters/Maintenance Facility into 5 subproperties, thereby skewing the statistics. If Table 4.2.16-4 instead tabulated only whole historic properties, Alternative DUW-2 actually impacts the fewest historic properties of any alternative.

As shown in Table 4.2.17-1, Alternative DUW-2 is the only alternative that would have no permanent impact at all to parks and recreational resources.

Table 4.2.18-2 repeats the inexplicable division of the Department of Highways District No. 1 Headquarters/Maintenance Facility into five subproperties. As a result, Alternative DUW-2 would appear to be similar to other alternatives in its impact on properties with Preliminary Section 4(f) Determinations. However, when evaluating the DOH District 1 HQ/Maintenance Facility as a single property, Alternative DUW-2 in fact impacts the fewest number of properties with Preliminary Section 4(f) Determinations.

Please support the DUW-2 Alternative that does not force BladeGallery's Epicurean Edge to move again or close shop.

#### Owner(s):

Contact ID	Name	Type	Phones	Email
1077124	Daniel O'Malley	Individual	+1 (206) 261-1735	<a href="mailto:omalley@bladegallery.com">omalley@bladegallery.com</a>

**Communication ID: 502719 – BladeGallery Draft EIS Comment**

#	Comments	Responses
1	<p>These irregularities appear to skew the representation of the data to make the Preferred Alternative DUW-1A appear better than the Alternative DUW-2. Please consider the following comments on the appropriateness of Alternative DUW-2: As stated in Paragraph 4.2.2.3.3, Alternative DUW-2 would not convert any single- or multi-family residential land or City-owned open space to a transportation use. As shown in Table 4.2.3-2 and stated in Paragraph 4.2.3.3.3, Alternative DUW-2 would displace the fewest employees - about 40% fewer than other alternatives. As stated in Paragraph 4.2.5.3.3, Alternative DUW-2 would have the least change to the visual character in areas with concentrations of sensitive viewers and the least impact on visual quality of all the Duwamish Segment Build Alternatives As stated in Paragraph 4.2.7.3.2, Alternative DUW-2 would have the fewest noise impacts of all the Duwamish Segment Build Alternatives - about 90% fewer than other alternatives. As shown in Table 4.2.8-1, Alternative DUW-2 would introduce the least square footage of total new impervious surface by a significant margin - less than 10% that of other alternatives. As stated in Paragraph 4.2.8.3.3, Alternative DUW-2 would not require relocation of any outfalls. As shown in Table 4.2.9-2, Alternative DUW-2 would have no effect at all on Alternative Wetlands, Wetland Buffers, and Biodiversity areas. As stated in Paragraph 4.2.11.3.3, Alternative DUW-2 would avoid the steep slopes on Pigeon Point, offering the greatest slope stability and least landslide risk, thereby avoiding the need to construct retaining structures. As stated in Paragraph 4.2.14.3.3, Alternative DUW-2 would not be expected to require relocation of Fire Station 14, and no long-term effects are expected. Table 4.2.16-4 seems to indicate Alternative DUW-2 would impact 9 historic properties, the most of any alternative. However, the table inexplicably divides the Department of Highways District No. 1 Headquarters/Maintenance Facility into 5 subproperties, thereby skewing the statistics. If Table 4.2.16-4 instead tabulated only whole historic properties, Alternative DUW-2 actually impacts the fewest historic properties of any alternative. As shown in Table 4.2.17-1, Alternative DUW-2 is the only alternative that would have no permanent impact at all to parks and recreational resources. Table 4.2.18-2 repeats the inexplicable division of the Department of Highways District No. 1 Headquarters/Maintenance Facility into five subproperties. As a result, Alternative DUW-2 would appear to be similar to other alternatives in its impact on properties with Preliminary Section 4(f) Determinations. However, when evaluating the DOH District 1 HQ/Maintenance Facility as a single property, Alternative DUW-2 in fact impacts the fewest number of properties with Preliminary Section 4(f) Determinations. Please support the DUW-2 Alternative that does not force BladeGallery's Epicurean Edge to move again or close shop.</p>	<p>Please see responses to CCG2 and CCG3 in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Please see Section 2.5, Alternatives Development and Scoping, of the Final EIS for more information on the Sound Transit Board Motion. The Sound Transit Board will select the project to be built after the Final EIS is prepared.</p> <p>Although Alternative DUW-2 would not require relocation at Fire Station 14, the same is true for Preferred Alternative DUW-1a and Option DUW-1b. In addition, although Alternative DUW-2 would have no permanent impact to parks and recreational resources, other impacts to resources were compared. Please see Chapter 6, Alternatives Evaluation, of the Final EIS for more information meeting the project purpose and need. The number of historic resources on individual properties is determined in consultation with the State Historic Preservation Officer. Please see Section 4.16, Historic and Archaeological Resources, of the Final EIS.</p>



April 27, 2022

Dear Councilmembers and Sound Transit Board

We understand that two of the three proposed routes (DUW-1a and DUW-1b) of the West Seattle Link Extension will require the condemnation and acquisition of our property at 3628 E Marginal Way S. in SODO, Seattle.

We feel that our unique business faces significant difficulties if forced to move that are not necessarily borne by many of the warehouses and industry in the SODO area.

If possible, we would welcome you to visit BladeGallery's Epicurean Edge in person so that you can see the impact and difficulties potentially caused by this Light Rail Path. I would welcome the opportunity to show you our facility. You can also see a quick video of our location here:

<https://youtu.be/JuUOHyHNPIk>

We ask your assistance in mitigating the loss of our building in any way possible. In this early stage in design, each of the proposed Light Rail paths could likely be re-routed slightly to the north or south of our property (if not moving development to the second alternative to the North of Spokane St – DUW-2) so as not to require us to relinquish our building to Sound Transit and be forced to move again.

**1) Recovering costs of our recent move and extensive renovation will be virtually impossible.**

After two years of renovations, we finally received our final Certificate of Occupancy in January 2022. Having just moved from Kirkland to this location in 2021 after purchasing the property in 2020, we fear that our business is unlikely to survive another move at this time – even more so given the difficult economic times created by Covid19. For businesses that have been in their SODO location for many years, while moving has significant costs, they have already recovered their initial renovation, development and moving costs through years of use. Additionally, it is likely that many of the businesses affected may welcome the opportunity to have a new renovated space in a new location.

Our move from Kirkland to SODO has taken two years and we will still be finalizing renovations for at least the next year. We have transformed our 1924 warehouse into a refined location showing the workmanship of the past, retaining the feel of this historic building (including its massive old growth beams!). These renovations have transformed this tired warehouse into a flagship showing the promise of the Seattle SODO neighborhood. Moving and cataloging our extensive and fragile inventory has been quite an undertaking (much of our inventory needs consistent temperature and humidity control).

- Covid19 led to significant cost increases in renovation materials, difficulties and delays, and unavoidable adjustments to our plans
- City of Seattle required many expensive modifications including
  - ADA considerations (multiple handicapped wheelchair access ramps, ADA bathrooms, etc)
  - Environmental considerations
    - Re-roofing the entire 18,000 sqft building to allow for 8 inches of insulation on the roof



- Fire barrier walls with multiple layers of drywall and insulation (especially expensive right now!)
  - Full electric upgrade, alone costing over \$200,000
  - Engineered high efficiency HVAC system
- Current increases in mortgage rates as well as inflationary costs will lead to significant long term expenses if we need to finance a new building and begin renovations again
- Already, the threat of a forced move has blighted critical aspects of our business.
  - Our lead instructor, Mastersmith Bill Burke, has determined that given the uncertainty caused by Light Rail, it is not possible to move his family to the Seattle area from Idaho to organize our classes.
  - Until the effect of Light Rail is fully determined, we are unable to complete the final development phases necessary for our Bladesmithing classes.
    - We have been forced to indefinitely postpone plans to bring in a larger natural gas line for our forges, which has meant that we are already losing significant income by not being able to teach forging classes

Our move required an SBA loan as well as a Chase loan. Both of these loans have early payment penalties, which we would encounter if we were forced to move. I have personally had to remortgage my house in Fremont to help cover renovation expenses. Literally, everything in my financial life is at stake.

**2) The items we sell are very fragile, making moving again extremely difficult and likely to result in damage.**

Prior to us purchasing and moving into SODO, the building housed a warehousing company for Mexican spices. A business like this can easily and safely move. Our business, on the other hand, has many facets that require tremendous customization (at great expense) of the space that we work in. The handmade products that we house are extremely fragile and are greatly affected by temperature, humidity, vibration, and pressure changes. A move will undoubtedly cause significant damage to some items in our unique inventory. The process of moving our company is not unlike moving a museum, yet is also compounded by having large industrial equipment required by other segments of our company.

**3) DUW-1a and DUW-1b will destroy significant public art by Henry Ryan Ward.**

Henry Ryan Ward is a significant artist from Seattle. Over the past decades, he has developed an international following and his artwork has significant monetary value as well as being meaningful public art. DUW-1a and DUW-1b will condemn two buildings with some of Henry's largest murals. The front of our building and the front of Buffalo Industries at 99 S Spokane St are among Henry's largest and most iconic artwork. Henry's murals are not only a Seattle icon, but they also bring tourists from outside Seattle to view his works. Obviously, because these murals are painted directly onto the building, moving them is impossible.

**4) Our current location is critical for our company because it provides easy access to the freeways and Port of Seattle.**

We spent three years searching for the correct location for our multi-pronged business. Visitors to BladeGallery's Epicurean Edge are often coming to Seattle from a significant distance, making airport access important. Our 'local' customers come from Renton, Bellevue, Kirkland, Redmond, Bellingham, and other cities throughout Washington. The SODO area provides a central location with easy access to the East Side through I-90 and 520 as well as the north



and south by I-5. Because many of the items we showcase are from around the world, the proximity to Port of Seattle is quite important.

**5) Our building is renovated to show off its roots as an early Seattle warehouse.**

We sell handmade items – something that is rarely found today, but which were common in the 1800s and 1900s. It is important that the gallery where our work is displayed evokes an earlier time when life moved at a slower pace and creating with your hands was the norm. Our building is a relic of that Seattle past, with huge old growth beams which were carefully stripped of paint and grime during our renovations and are a centerpiece of our presentation.

**6) Over 400 of our customers have sent letters to request help such that we might not need to move.**

Our loyal customer base is asking your assistance in helping to save our business.

**7) BladeGallery's Epicurean Edge is an economic boon for the SODO area.**

We draw customers from all over the world to visit our gallery. The sales at our gallery are a boon to the Seattle economy and these visitors have a cascading effect by bringing in tax dollars through hotels and lodging, restaurants, as well as purchases at other stores in the Seattle area.

**8) BladeGallery's Epicurean Edge is unique.**

BladeGallery's Epicurean Edge doesn't exist anywhere else. We are a social and economic hub for the International bladesmithing and knifemaking community. By teaching classes, selling raw materials, displaying, selling and promoting these one-of-a-kind artworks, we are supporting hundreds of individual artists around the world. There is literally not another business like ours in the world.

**Who we are:**

- BladeGallery Inc has several arms that are run out of our SODO flagship.
  - Our 2200 sqft temperature and humidity controlled showroom displays a wide selection of handmade and production knives, including chef's knives, straight razors, and manicure gear.
  - We offer a world class sharpening service – knives are regularly sent to us for sharpening and repair from as far away as New Zealand, Australia, and Japan, as well as from around the US. We provide sharpening and repair services for a large portion of chefs in the Pacific Northwest.
  - We have a 6500 sqft custom knifemaking forge and education studio.
  - We house 1400 sqft of temperature and humidity controlled warehousing for our products, many of which are literally one-of-a-kind in the world and utilize some of the rarest (and most fragile) materials found anywhere.
  - We sell raw materials such as Takefu Steel to knifemakers to complete their work.
  - We teach classes aimed at established knifemakers and beginners. As we are developing our curriculum, we are gearing classes toward youth as well as providing scholarships for low income students, adding to the vibrant Pacific Northwest knifemaking community.
  - We are developing a resident artist program where 1-2 resident artists are supported in their work and studies to further develop their creativity and skills.



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- BladeGallery Inc is a small business that supports 8 employee households and we anticipate hiring two additional employees in the next year.
- Our business supports over 600 artisans from around the world, custom building knives. In many cases, we are these artists' primary sales mechanism.
- Our showroom draws customers to the greater Seattle area to visit -- not only do customers visit our business from Everett, Bellingham, and Vancouver to the north, Renton and Tukwila to the South, and Bellevue, Redmond and Kirkland to the East, but customers regularly fly to Seattle to visit our showroom from international and distant US locations. This influx of customers to the greater Seattle area is beneficial to the Seattle tax base.

Being forced to move due to the West Seattle Link Extension would not only have a significant financial impact on our company, our employees and their families, as well as the hundreds of artisan knifemakers that we represent, but it might literally be non-financially-recoverable for our company and me personally. Even if Sound Transit is required to pay 'fair market value' for our property, this doesn't come close to covering the thousands of hours of work and significant renovation costs, let alone architectural fees, banking fees, etc (none of which have been recovered due to our recent move). Finding a replacement building in an appropriate location and of the correct style, paying staff for 2-3 years while renovations are completed, storing our fragile inventory in a temporary temperature and humidity controlled environment during that time, and finally moving again seems insurmountable.

I greatly appreciate any efforts that you can make to select a path that does not force our company to move or close down -- which in turn would result in tremendous difficulties for our employees and the hundreds of artisans we represent.

Yours,

Daniel O'Malley  
President, BladeGallery Inc  
Manager, Red Wall LLC

Home address:

4338 Evanston Ave N  
Seattle, WA 98103

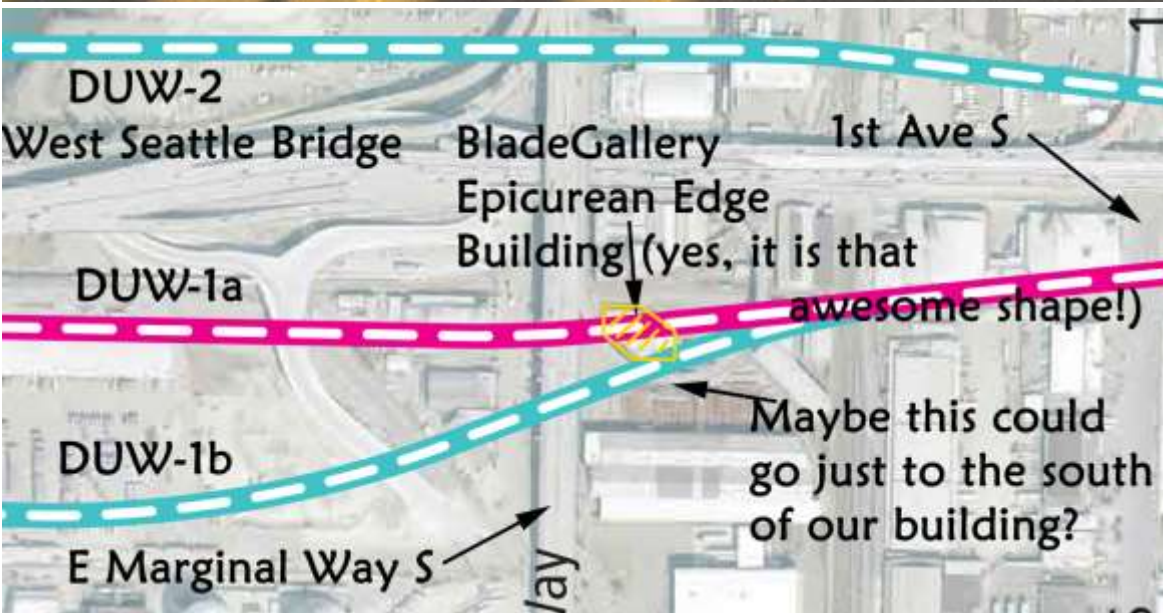
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**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504704 - BladeGallery Draft EIS Comment**

#	Comments	Responses
1	<p>We understand that two of the three proposed routes (DUW-1a and DUW-1b) of the West Seattle Link Extension will require the condemnation and acquisition of our property at 3628 E Marginal Way S. in SODO, Seattle. We feel that our unique business faces significant difficulties if forced to move that are not necessarily borne by many of the warehouses and industry in the SODO area. If possible, we would welcome you to visit BladeGallery's Epicurean Edge in person so that you can see the impact and difficulties potentially caused by this Light Rail Path. I would welcome the opportunity to show you our facility. You can also see a quick video of our location here: <a href="https://youtu.be/JuUOHyHNPIk">https://youtu.be/JuUOHyHNPIk</a> We ask your assistance in mitigating the loss of our building in any way possible. In this early stage in design, each of the proposed Light Rail paths could likely be re- routed slightly to the north or south of our property (if not moving development to the second alternative to the North of Spokane St - DUW-2) so as not to require us to relinquish our building to Sound Transit and be forced to move again.</p>	<p>The Sound Transit Board confirmed Alternative DUW-1a as the preferred alternative following the WSBLE Draft EIS comment period. Please see Section 2.5, Alternatives Development and Scoping, of the West Seattle Link Extension Final EIS for more information on the Sound Transit Board Motion. The Sound Transit Board will select the project to be built after the Final EIS is prepared. Due to constraints of existing roadways and railroads surrounding this property, along with requirements for spacing of columns, this property cannot be avoided under Preferred Alternative DUW-1a.</p>
2	<p>1)Recovering costs of our recent move and extensive renovation will be virtually impossible. After two years of renovations, we finally received our final Certificate of Occupancy in January 2022. Having just moved from Kirkland to this location in 2021 after purchasing the property in 2020, we fear that our business is unlikely to survive another move at this time - even more so given the difficult economic times created by Covid19. For businesses that have been in their SODO location for many years, while moving has significant costs, they have already recovered their initial renovation, development and moving costs through years of use. Additionally, it is likely that many of the businesses affected may welcome the opportunity to have a new renovated space in a new location. Our move from Kirkland to SODO has taken two years and we will still be finalizing renovations for at least the next year. We have transformed our 1924 warehouse into a refined location showing the workmanship of the past, retaining the feel of this historic building (including its massive old growth beams!). These renovations have transformed this tired warehouse into a flagship showing the promise of the Seattle SODO neighborhood. Moving and cataloging our extensive and fragile inventory has been quite an undertaking (much of our inventory needs consistent temperature and humidity control).          ·Covid19 led to significant cost increases in renovation materials, difficulties and delays, and unavoidable adjustments to our plans          ·City of Seattle required many expensive modifications including ADA considerations (multiple handicapped wheelchair access ramps, ADA bathrooms, etc)          Environmental considerations §Re- roofing the entire 18,000 sqft building to allow for 8 inches of insulation on the roof §Fire barrier walls with multiple layers of drywall and insulation (especially expensive right now!) Full electric upgrade, alone costing over \$200,000 Engineered high efficiency HVAC system          ·Current increases in mortgage rates as well as inflationary costs will lead to significant long term expenses if we need to finance a new building and begin renovations again          ·Already, the threat of a forced move has blighted critical aspects of our</p>	<p>Sound Transit acknowledges the inconvenience and hardship of relocating a unique business. Please see the mitigation section in Section 4.1, Acquisitions, Displacements, and Relocations, of the Final EIS for more information on support Sound Transit would provide to help find new homes or sites, solve problems that might occur, and plan for relocation. The real estate appraisal will account for all improvements to the property, including artwork integrated into the building, at the time the appraisal is completed. Please see responses to CC4.1a and CC4.1d in Table 7-1 in Chapter 7, Comment Summary, of the Final EIS.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>business. Our lead instructor, Mastersmith Bill Burke, has determined that given the uncertainty caused by Light Rail, it is not possible to move his family to the Seattle area from Idaho to organize our classes. Until the effect of Light Rail is fully determined, we are unable to complete the final development phases necessary for our Bladesmithing classes. §We have been forced to indefinitely postpone plans to bring in a larger natural gas line for our forges, which has meant that we are already losing significant income by not being able to teach forging classes Our move required an SBA loan as well as a Chase loan. Both of these loans have early payment penalties, which we would encounter if we were forced to move. I have personally had to remortgage my house in Fremont to help cover renovation expenses.</p> <p>Literally, everything in my financial life is at stake. The items we sell are very fragile, making moving again extremely difficult and likely to result in damage. Prior to us purchasing and moving into SODO, the building housed a warehousing company for Mexican spices. A business like this can easily and safely move. Our business, on the other hand, has many facets that require tremendous customization (at great expense) of the space that we work in. The handmade products that we house are extremely fragile and are greatly affected by temperature, humidity, vibration, and pressure changes. A move will undoubtedly cause significant damage to some items in our unique inventory. The process of moving our company is not unlike moving a museum, yet is also compounded by having large industrial equipment required by other segments of our company.</p> <p>DUW-1a and DUW-1b will destroy significant public art by Henry Ryan Ward. Henry Ryan Ward is a significant artist from Seattle. Over the past decades, he has developed an international following and his artwork has significant monetary value as well as being meaningful public art. DUW-1a and DUW-1b will condemn two buildings with some of Henry's largest murals. The front of our building and the front of Buffalo Industries at 99 S Spokane St are among Henry's largest and most iconic artwork. Henry's murals are not only a Seattle icon, but they also bring tourists from outside Seattle to view his works. Obviously, because these murals are painted directly onto the building, moving them is impossible. Our current location is critical for our company because it provides easy access to the freeways and Port of Seattle. We spent three years searching for the correct location for our multi-pronged business. Visitors to BladeGallery's Epicurean Edge are often coming to Seattle from a significant distance, making airport access important. Our 'local' customers come from Renton, Bellevue, Kirkland, Redmond, Bellingham, and other cities throughout Washington. The SODO area provides a central location with easy access to the East Side through 1-90 and 520 as well as the north and south by 1-5. Because many of the items we showcase are from around the world, the proximity to Port of Seattle is quite important. Our building is renovated to show off its roots as an early Seattle warehouse. We sell handmade items - something that is rarely found today, but which were common in the 1800s and 1900s. It is important that the gallery where our work is displayed evokes an earlier time when life moved at a slower pace and creating with your hands was the norm. Our building is a relic of that Seattle past, with</p>	

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>huge old growth beams which were carefully stripped of paint and grime during our renovations and are a centerpiece of our presentation. Over 400 of our customers have sent letters to request help such that we might not need to move. Our loyal customer base is asking your assistance in helping to save our business. BladeGallery's Epicurean Edge is an economic boon for the SODO area. We draw customers from all over the world to visit our gallery. The sales at our gallery are a boon to the Seattle economy and these visitors have a cascading effect by bringing in tax dollars through hotels and lodging, restaurants, as well as purchases at other stores in the Seattle area. BladeGallery's Epicurean Edge is unique. BladeGallery's Epicurean Edge doesn't exist anywhere else. We are a social and economic hub for the International bladesmithing and knifemaking community. By teaching classes, selling raw materials, displaying, selling and promoting these one-of-a-kind artworks, we are supporting hundreds of individual artists around the world. There is literally not another business like ours in the world.</p>	



Calvin Nutt, PE  
Manager Engineering  
Northwest Division

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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.

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 503311 - BNSF Railway Draft EIS Comment**

#	Comments	Responses
1	<p>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: BNSF opposes any WSBLE infrastructure that inhibits current alignments and operations as well as any that restrict future expansion prospects. BNSF expects that WSBLE will clear-span BNSF right-of-way in locations that it must cross it. BNSF has concerns about geotechnical impacts to existing track and structures caused by proposed WSBLE structures and tunnels. BNSF requires 3rd party review of proposed structures that could create geotechnical loading impacts on BNSF track/structures. Infrastructure that may create geotechnical impacts on BNSF track/structures will require monitoring for movement during and after construction. Any shoring that may be necessary on or near BNSF property must be designed and processed per the BNSF/UP guidelines for temporary shoring. Utilities that must be relocated and impact BNSF property must be designed and permitted per the BNSF utility accommodation policy. Any structures over BNSF ROW must be designed and processed through BNSF in per the BNSF/UP guidelines for railroad grade separation projects.</p>	<p>Comment noted. Sound Transit has continued to coordinate with BNSF to minimize impacts to existing and future rail operations. Coordination will continue through final design and construction.</p>
2	<p>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.</p>	<p>Please see Appendix L4.1, Acquisitions, Displacements, and Relocations, of the West Seattle Link Extension Final EIS for more information on potentially affected parcels. Sound Transit has initiated discussions with BNSF regarding acquisition of BNSF properties identified in this appendix, either through fee acquisition or easement.</p>
3	<p>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</p>	<p>Sound Transit has noted your concerns related to proximity to your facilities at these locations. Sound Transit has continued to coordinate with BNSF as project design advances to minimize impacts to BNSF operations.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>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.</p>	
4	<p>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.</p>	<p>Comment noted. Sound Transit has not identified any impacts to BNSF facilities in the Delridge or West Seattle Junction segments.</p>
5	<p>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.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
6	<p>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.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
7	<p>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</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	/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.	
8	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.	A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.
9	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.	A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.
10	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.	A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.
11	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.	A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.
12	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.	A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.
13	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.	A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.

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## Sound Transit Projects - Communications (1 Total)

### Search Term

500812

### Communication ID: 500812

#### Communication ( 4/20/2022 )

Greetings:

Please see the below comments regarding the WSBLE Draft Environmental Impact Statement. We implore you to please consider selecting DEL-5 and DEL-6 for the West Seattle Sound Transit route.

We are longtime West Seattle residents and own a small Architecture Consulting firm that employs ~20 people many of whom live in West Seattle. Furthermore, we are co-owners of the 4000 Delridge Way SW property, which would be directly impacted by four of the West Seattle Link Extension route options being considered. We purchased this property on the corner of Delridge and Andover in 1999 and then helped design and construct the building, which our business, along with another of the building's co-owner's business, has occupied since 2004. We adore this space and it has been home to our business since it was built. We plan to continue to run our business out of this space for many years; however, all but two of the proposed options would impact our office and force us to leave.

In reviewing the Draft EIS Executive Summary Delridge Segment (ES.3.1.1.3, page ES-13 – ES-18), it appears that the proposed options DEL-1a, DEL-1b, DEL-2a, DEL-2b, DEL-3, DEL-4 all impact the corner of Delridge and Andover. Not only would they force our office building to close they would essentially demolish the surrounding neighborhood. When we built our building at 4000 Delridge Way the city encouraged us to make it as nice as possible and required us to add the parking structure so as to improve the visual appearance of the Delridge/Andover corner. We have been good neighbors and helped to keep that part of the Delridge corridor a thriving business district. There are very few commercial buildings that would fit our needs and it would be devastating for our business and employee morale to have to leave West Seattle.

It seems DEL-5 or DEL-6 are superior options generally, due to less neighborhood impact. Specifically, these options would allow us to remain on our corner and prevent any disruption to our thriving business. Options DEL-5 and DEL-6 would disrupt the fewest amount of residential and a similar number of commercial properties – both of which are limited in West Seattle. Our business would face great hardship if we had to leave West Seattle. DEL-5 and DEL-6 seem to be a more logical route for Sound Transit as per the table on Executive Summary ES-18 – the noise and visual impact would appear to be significantly less if DEL-6 was chosen above all other options. Furthermore DEL-5 only impacts 2 historical buildings and DEL-6 impacts 0, furthermore DEL-5 and DEL-6 have zero impacts on park and recreational resources, whereas the first four options impact a park and golf course. Additionally, the DEL-6 option is cheaper than the others making it a great choice since construction costs are rising at a dramatic rate. We disagree with the predicted ridership rates as maintaining the business district near the Delridge/Andover corner and adjacent buildings would increase ridership. The traffic impacts may be challenging and we will be prepared for those; however, a year or three of traffic inconveniences is a small sacrifice for being able to keep our building, particularly since we just went through a major upgrade to Delridge Way and have dealt with the more than two year closure of the West Seattle Bridge. The 4000 Delridge Way building is home to our family business and has provided hundreds of folks jobs over the years, forcing us to sell this property would be devastating as this building was designed and built to be a long-term investment with the highest quality of materials, including locally source wood siding and interior beams, as well as copper cladding. It is designed and built to last even in a changing climate. We have no intention of selling this property and would like to maintain it for generations to come.

We implore you to please consider selecting DEL-5 and DEL-6 for the West Seattle Sound Transit route. Thank you.

#### Owner(s):

Contact ID	Name	Type	Phones	Email
1054746	Martha Carlson	Individual		mcarlson@bet-r.com

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 500812 – Delridge Development LLC, Martha Carlson Draft EIS Comment**

#	Comments	Responses
1	<p>Please see the below comments regarding the WSBLE Draft Environmental Impact Statement. We implore you to please consider selecting DEL-5 and DEL-6 for the West Seattle Sound Transit route. We are longtime West Seattle residents and own a small Architecture Consulting firm that employs ~20 people many of whom live in West Seattle. Furthermore, we are co-owners of the 4000 Delridge Way SW property, which would be directly impacted by four of the West Seattle Link Extension route options being considered. We purchased this property on the corner of Delridge and Andover in 1999 and then helped design and construct the building, which our business, along with another of the building's co-owner's business, has occupied since 2004. We adore this space and it has been home to our business since it was built. We plan to continue to run our business out of this space for many years; however, all but two of the proposed options would impact our office and force us to leave. In reviewing the Draft EIS Executive Summary Delridge Segment (ES.3.1.1.3, page ES-13 - ES-18), it appears that the proposed options DEL-1a, DEL-1b, DEL-2a, DEL-2b, DEL-3, DEL-4 all impact the corner of Delridge and Andover. Not only would they force our office building to close they would essentially demolish the surrounding neighborhood. When we built our building at 4000 Delridge Way the city encouraged us to make it as nice as possible and required us to add the parking structure so as to improve the visual appearance of the Delridge/Andover corner. We have been good neighbors and helped to keep that part of the Delridge corridor a thriving business district. There are very few commercial buildings that would fit our needs and it would be devastating for our business and employee morale to have to leave West Seattle. It seems DEL-5 or DEL-6 are superior options generally, due to less neighborhood impact. Specifically, these options would allow us to remain on our corner and prevent any disruption to our thriving business. Options DEL-5 and DEL-6 would disrupt the fewest amount of residential and a similar number of commercial properties - both of which are limited in West Seattle. Our business would face great hardship if we had to leave West Seattle. DEL-5 and DEL-6 seem to be a more logical route for Sound Transit as per the table on Executive Summary ES-18 -the noise and visual impact would appear to be significantly less if DEL-6 was chosen above all other options. Furthermore DEL-5 only impacts 2 historical buildings and DEL-6 impacts 0, furthermore DEL-5 and DEL-6 have zero impacts on park and recreational resources, whereas the first four options impact a park and golf course. Additionally, the DEL-6 option is cheaper than the others making it a great choice since construction costs are rising at a dramatic rate</p>	<p>Please see responses to CCG2, CC4.1a, CC4.3b, and CC4.4a in Table 7-1, in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Chapter 6, Alternatives Evaluation, of the Final EIS provides a comparison of key impact differences between alternatives.</p>
2	<p>We disagree with the predicted ridership rates as maintaining the business district near the Delridge/Andover corner and adjacent buildings would increase ridership. The traffic impacts may be challenging and we will be prepared for those; however, a year or three of traffic inconveniences is a small sacrifice for being able to keep our building, particularly since we just went through a major upgrade to Delridge Way and have dealt with the more than two year closure of the West Seattle Bridge.</p>	<p>Please see response to CC3d in Table 7-1. Please see Chapter 3, Transportation Environment and Consequences, of the Final EIS for more information about ridership and traffic impacts, which have been updated in the Final EIS.</p>



## Sound Transit Projects - Communications (1 Total)

### Search Term

501281

### Communication ID: 501281

#### Communication ( 4/25/2022 )

##### Greetings:

Please see the below comments regarding the WSBLE Draft Environmental Impact Statement. We implore you to please consider selecting DEL-5 and DEL-6 for the West Seattle Sound Transit route.

In reviewing the Draft EIS Executive Summary Delridge Segment (ES.3.1.1.3, page ES-13 – ES-18), it appears that the proposed options DEL-1a, DEL-1b, DEL-2a, DEL-2b, DEL-3, DEL-4 all impact the corner of Delridge and Andover. Not only would they force our office building to close they would essentially demolish the surrounding neighborhood. When we built our building at 4000 Delridge Way the city encouraged us to make it as nice as possible and required us to add the parking structure so as to improve the visual appearance of the Delridge/Andover corner. We have been good neighbors and helped to keep that part of the Delridge corridor a thriving business district. There are very few commercial buildings that would fit our needs and it would be devastating for our business and employee morale to have to leave West Seattle.

It seems DEL-5 or DEL-6 are superior options generally, due to less neighborhood impact. Specifically, these options would allow us to remain on our corner and prevent any disruption to our thriving business. Options DEL-5 and DEL-6 would disrupt the fewest amount of residential and a similar number of commercial properties – both of which are limited in West Seattle. Our business would face great hardship if we had to leave West Seattle. DEL-5 and DEL-6 seem to be a more logical route for Sound Transit as per the table on Executive Summary ES-18 – the noise and visual impact would appear to be significantly less if DEL-6 was chosen above all other options. Furthermore DEL-5 only impacts 2 historical buildings and DEL-6 impacts 0, furthermore DEL-5 and DEL-6 have zero impacts on park and recreational resources, whereas the first four options impact a park and golf course. Additionally, the DEL-6 option is cheaper than the others making it a great choice since construction costs are rising at a dramatic rate. We disagree with the predicted ridership rates as maintaining the business district near the Delridge/Andover corner and adjacent buildings would increase ridership. The traffic impacts may be challenging and we will be prepared for those; however, a year or three of traffic inconveniences is a small sacrifice for being able to keep our building, particularly since we just went through a major upgrade to Delridge Way and have dealt with the more than two year closure of the West Seattle Bridge. The 4000 Delridge Way building is home to our family business and has provided hundreds of folks jobs over the years, forcing us to sell this property would be devastating as this building was designed and built to be a long-term investment with the highest quality of materials, including locally source wood siding and interior beams, as well as copper cladding. It is designed and built to last even in a changing climate. We have no intention of selling this property and would like to maintain it for generations to come.

We implore you to please consider selecting DEL-5 and DEL-6 for the West Seattle Sound Transit route. Thank you.

#### Owner(s):

Contact ID	Name	Type	Phones	Email
771733	<a href="#">Scott Vlotho</a>	Individual	206-334-5659 (Cell)	<a href="mailto:svlotho@hotmail.com">svlotho@hotmail.com</a>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 501281– Delridge Development LLC, Scott Vlotho Draft EIS Comment**

#	Comments	Responses
1	<p>We implore you to please consider selecting DEL-5 and DEL-6 for the West Seattle Sound Transit route. In reviewing the Draft EIS Executive Summary Delridge Segment (ES.3.1.1.3, page ES-13 - ES-18), it appears that the proposed options DEL-1a, DEL-1b, DEL-2a, DEL-2b, DEL-3, DEL-4 all impact the corner of Delridge and Andover. Not only would they force our office building to close they would essentially demolish the surrounding neighborhood. When we built our building at 4000 Delridge Way the city encouraged us to make it as nice as possible and required us to add the parking structure so as to improve the visual appearance of the Delridge/Andover corner. We have been good neighbors and helped to keep that part of the Delridge corridor a thriving business district. There are very few commercial buildings that would fit our needs and it would be devastating for our business and employee morale to have to leave West Seattle. It seems DEL-5 or DEL-6 are superior options generally, due to less neighborhood impact. Specifically, these options would allow us to remain on our corner and prevent any disruption to our thriving business. Options DEL-5 and DEL-6 would disrupt the fewest amount of residential and a similar number of commercial properties - both of which are limited in West Seattle. Our business would face great hardship if we had to leave West Seattle. DEL-5 and DEL-6 seem to be a more logical route for Sound Transit as per the table on Executive Summary ES-18 - the noise and visual impact would appear to be significantly less if DEL-6 was chosen above all other options. Furthermore DEL-5 only impacts 2 historical buildings and DEL-6 impacts 0, furthermore DEL-5 and DEL-6 have zero impacts on park and recreational resources, whereas the first four options impact a park and golf course. Additionally, the DEL-6 option is cheaper than the others making it a great choice since construction costs are rising at a dramatic rate.</p>	<p>Please see responses to CCG2, CC4.1a, CC4.3b, and CC4.4a in Table 7-1, in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Chapter 6, Alternatives Evaluation, of the Final EIS provides a comparison of key impact differences between alternatives.</p>
2	<p>We disagree with the predicted ridership rates as maintaining the business district near the Delridge/Andover corner and adjacent buildings would increase ridership. The traffic impacts may be challenging and we will be prepared for those; however, a year or three of traffic inconveniences is a small sacrifice for being able to keep our building, particularly since we just went through a major upgrade to Delridge Way and have dealt with the more than two year closure of the West Seattle Bridge.</p>	<p>Please see response to CC3d in Table 7-1. Please see Chapter 3, Transportation Environment and Consequences, of the Final EIS for more information about ridership and traffic impacts, which have been updated in the Final EIS.</p>

## Sound Transit Projects - Communications (1 Total)

### Search Term

503320

### Communication ID: 503320

#### Communication ( 4/28/2022 )

Greetings:

We implore you to please consider selecting DEL-5 and DEL-6 for the West Seattle Sound Transit route.

Below are my concerns regarding the WSBLE Draft Environmental Impact Statement.

In reviewing the Draft EIS Executive Summary Delridge Segment (ES.3.1.1.3, page ES-13 – ES-18), it appears that the proposed options DEL-1a, DEL-1b, DEL-2a, DEL-2b, DEL-3, DEL-4 all impact the corner of Delridge and Andover. Not only would they force our office building to close they would essentially demolish the surrounding neighborhood. When we built our building at 4000 Delridge Way the city encouraged us to make it as nice as possible and required us to add the parking structure so as to improve the visual appearance of the Delridge/Andover corner. We have been good neighbors and helped to keep that part of the Delridge corridor a thriving business district. There are very few commercial buildings that would fit our needs and it would be devastating for our business and employee morale to have to leave West Seattle.

It appears to us that DEL-5 or DEL-6 are superior options generally, due to less neighborhood impact. Specifically, these options would allow us to remain on our corner and prevent any disruption to our thriving business. Options DEL-5 and DEL-6 would disrupt the fewest amount of residential and a similar number of commercial properties – both of which are limited in West Seattle. Our business would face great hardship if we had to leave West Seattle.

Most Favored Options:

1. DEL-5 and DEL-6 seem to be a more logical route for Sound Transit as per the table on Executive Summary ES-18 – the noise and visual impact would appear to be significantly less if DEL-6 was chosen above all other options. 2. DEL-5 only impacts 2 historical buildings and DEL-6 impacts 0;
2. DEL-5 and DEL-6 have zero impacts on park and recreational resources, whereas the first four options impact a park and golf course.
3. DEL-6 option is cheaper than the others making it a great choice since construction costs are rising at a dramatic rate.

We disagree with the predicted ridership rates as maintaining the business district near the Delridge/Andover corner and adjacent buildings would increase ridership. The traffic impacts may be challenging and we will be prepared for those; however, a year or three of traffic inconveniences is a small sacrifice for being able to keep our building, particularly since we just went through a major upgrade to Delridge Way and have dealt with the more than two year closure of the West Seattle Bridge. The 4000 Delridge Way building is home the business that supports my family and all my peer's and business neighbor's families. business, and has provided hundreds of folks jobs over the years.

Forcing us to sell this property would be devastating as this building was designed and built to be a long-term investment with the highest quality of materials, including locally source wood siding and interior beams, as well as copper cladding. It is designed and built to last even in a changing climate. We have no intention of selling this property and would like to maintain it for generations to come.

We implore you to please consider selecting DEL-5 and DEL-6 for the West Seattle Sound Transit route. Thank you.

#### Owner(s):

Contact ID	Name	Type	Phones	Email
1078364	<a href="#">Stephen Elliott</a>	Individual		<a href="mailto:selliott@bet-r.com">selliott@bet-r.com</a>

## Appendix O. Draft EIS Comment Summary and Response to Comments

### Communication ID: 503320– Delridge Development LLC, Stephen Elliott Draft EIS Comment

#	Comments	Responses
1	<p>In reviewing the Draft EIS Executive Summary Delridge Segment (ES.3.1.1.3, page ES-13 - ES- 18), it appears that the proposed options DEL-1a, DEL-1b, DEL-2a, DEL-2b, DEL-3, DEL-4 all impact the corner of Delridge and Andover. Not only would they force our office building to close they would essentially demolish the surrounding neighborhood. When we built our building at 4000 Delridge Way the city encouraged us to make it as nice as possible and required us to add the parking structure so as to improve the visual appearance of the Delridge/Andover corner. We have been good neighbors and helped to keep that part of the Delridge corridor a thriving business district. There are very few commercial buildings that would fit our needs and it would be devastating for our business and employee morale to have to leave West Seattle. It appears to us that DEL-5 or DEL-6 are superior options generally, due to less neighborhood impact. Specifically, these options would allow us to remain on our corner and prevent any disruption to our thriving business. Options DEL-5 and DEL-6 would disrupt the fewest amount of residential and a similar number of commercial properties - both of which are limited in West Seattle. Our business would face great hardship if we had to leave West Seattle. Most Favored Options: DEL-5 and DEL-6 seem to be a more logical route for Sound Transit as per the table on Executive Summary ES-18- the noise and visual impact would appear to be significantly less if DEL-6 was chosen above all other options. 2. DEL-5 only impacts 2 historical buildings and DEL-6 impacts 0; DEL-5 and DEL-6 have zero impacts on park and recreational resources, whereas the first four options impact a park and golf course. DEL-6 option is cheaper than the others making it a great choice since construction costs are rising at a dramatic rate.</p>	<p>Please see responses to CCG2, CC4.1a, CC4.3b, and CC4.4a in Table 7-1, in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Chapter 6, Alternatives Evaluation, of the Final EIS provides a comparison of key impact differences between alternatives.</p>
2	<p>We disagree with the predicted ridership rates as maintaining the business district near the Delridge/Andover corner and adjacent buildings would increase ridership. The traffic impacts may be challenging and we will be prepared for those; however, a year or three of traffic inconveniences is a small sacrifice for being able to keep our building, particularly since we just went through a major upgrade to Delridge Way and have dealt with the more than two year closure of the West Seattle Bridge. The 4000 Delridge Way building is home the business that supports my family and all my peer's and business neighbor's families. business, and has provided hundreds of folks jobs over the years. Forcing us to sell this property would be devastating as this building was designed and built to be a long-term investment with the highest quality of materials, including locally source wood siding and interior beams, as well as copper cladding. It is designed and built to last even in a changing climate. We have no intention of selling this property and would like to maintain it for generations to come.</p>	<p>Please see response to CC3d in Table 7-1. Please see Chapter 3, Transportation Environment and Consequences, of the Final EIS for more information about ridership and traffic impacts, which have been updated in the Final EIS.</p>

## Sound Transit Projects - Communications (1 Total)

**Search Term**

503329

**Communication ID: 503329**

**Communication** ( 4/28/2022 )

**Greetings:**

We are co-owners of the 4000 Delridge Way SW property, which would be directly impacted by four of the West Seattle Link Extension route options being considered. We ask you to consider selecting DEL-5 and DEL-6 for the West Seattle Sound Transit route.

In reviewing the Draft EIS Executive Summary Delridge Segment (ES.3.1.1.3, page ES-13 – ES-18), it appears that the proposed options DEL-1a, DEL-1b, DEL-2a, DEL-2b, DEL-3, DEL-4 all impact the corner of Delridge and Andover. Not only would they force our office building to close they would essentially demolish the surrounding neighborhood.

It seems DEL-5 or DEL-6 are superior options generally, due to less neighborhood impact. Specifically, these options would allow us to remain on our corner and prevent any disruption to our thriving business. In addition, Options DEL-5 and DEL-6 would disrupt the fewest amount of residential and commercial properties – both of which are limited in West Seattle; our business would face great hardship if we had to leave West Seattle.

Additionally, DEL-5 and DEL-6 seem to be a more logical route for Sound Transit as per the table on Executive Summary ES-18 – the noise and visual impact would be significantly less if DEL-6 was chosen above all other options. Furthermore DEL-5 only impacts 2 historical buildings and DEL-6 impacts 0, both of these options have zero impacts on park and recreational resources, whereas the first four options impact a park and golf course. And, the DEL-6 option is cheaper than the others making it a great choice since construction costs are rising at a dramatic rate.

We disagree with the predicted ridership rates as maintaining the business district near the Delridge/Andover corner and adjacent buildings would increase ridership. The traffic impacts may be challenging and we will be prepared for those; however, a year or three of traffic inconveniences is a small sacrifice for being able to keep our building, particularly since we just went through a major upgrade to Delridge Way and have dealt with the more than two year closure of the West Seattle Bridge.

The 4000 Delridge Way building is home to our family business and has provided hundreds of folks jobs over the years, forcing us to sell this property would be devastating as this building was designed and built to be a long-term investment. It is designed and built to last even in a changing climate.

We urge you to please consider selecting DEL-5 and DEL-6 for the West Seattle Sound Transit route. Thank you.

**Owner(s):**

Contact ID	Name	Type	Phones	Email
882190	<a href="#">scott Stemper</a>	Individual		<a href="mailto:scott@stemperac.com">scott@stemperac.com</a>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 503329 – Delridge Development LLC, Scott Stemper Draft EIS Comment**

#	Comments	Responses
1	<p>We ask you to consider selecting DEL-5 and DEL-6 for the West Seattle Sound Transit route. In reviewing the Draft EIS Executive Summary Delridge Segment (ES.3.1.1.3, page ES-13 - ES-18), it appears that the proposed options DEL-1a, DEL-1b, DEL-2a, DEL-2b, DEL-3, DEL-4 all impact the corner of Delridge and Andover. Not only would they force our office building to close they would essentially demolish the surrounding neighborhood. It seems DEL-5 or DEL-6 are superior options generally, due to less neighborhood impact. Specifically, these options would allow us to remain on our corner and prevent any disruption to our thriving business. In addition, Options DEL-5 and DEL-6 would disrupt the fewest amount of residential and commercial properties - both of which are limited in West Seattle; our business would face great hardship if we had to leave West Seattle.</p> <p>Additionally, DEL-5 and DEL-6 seem to be a more logical route for Sound Transit as per the table on Executive Summary ES-18 - the noise and visual impact would be significantly less if DEL-6 was chosen above all other options. Furthermore DEL-5 only impacts 2 historical buildings and DEL-6 impacts 0, both of these options have zero impacts on park and recreational resources, whereas the first four options impact a park and golf course. And, the DEL-6 option is cheaper than the others making it a great choice since construction costs are rising at a dramatic rate.</p>	<p>Please see responses to CCG2, CC4.1a, CC4.3b, and CC4.4a in Table 7-1, in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Chapter 6, Alternatives Evaluation, of the Final EIS provides a comparison of key impact differences between alternatives.</p>
2	<p>We disagree with the predicted ridership rates as maintaining the business district near the Delridge/Andover corner and adjacent buildings would increase ridership. The traffic impacts may be challenging and we will be prepared for those; however, a year or three of traffic inconveniences is a small sacrifice for being able to keep our building, particularly since we just went through a major upgrade to Delridge Way and have dealt with the more than two year closure of the West Seattle Bridge. The 4000 Delridge Way building is home to our family business and has provided hundreds of folks jobs over the years, forcing us to sell this property would be devastating as this building was designed and built to be a long-term investment. It is designed and built to last even in a changing climate.</p>	<p>Please see response to CC3d in Table 7-1. Please see Chapter 3, Transportation Environment and Consequences, of the Final EIS for more information about ridership and traffic impacts, which have been updated in the Final EIS.</p>

## Sound Transit Projects - Communications (1 Total)

### Search Term

504066

### Communication ID: 504066

Communication ( 4/28/2022 )

Greetings:

Please see the below comments regarding the WSBLE Draft Environmental Impact Statement. We respectfully urge that you select DEL-5 and DEL-6 for the West Seattle Sound Transit route.

In reviewing the Draft EIS Executive Summary Delridge Segment (ES.3.1.1.3, page ES-13 – ES-18), it appears that the proposed options DEL-1a, DEL-1b, DEL-2a, DEL-2b, DEL-3, DEL-4 all impact the corner of Delridge and Andover. As part owner of the 4000 Delridge Way building, I strongly object to any of these four routes. When we built our building at 4000 Delridge Way the City of Seattle encouraged us to make it as nice as possible and required us to add the parking structure so as to improve the visual appearance of the Delridge/Andover corner. We have been good neighbors and helped to keep that part of the Delridge corridor a thriving business district. There are very few commercial buildings that would fit our needs and it would be devastating for our business and employee morale to have to leave West Seattle. The majority of our employees live in West Seattle.

The selection of either DEL-5 or DEL-6 option would allow our unique office building to remain in this location and prevent any disruption to our thriving business. Options DEL-5 and DEL-6 would disrupt the fewest amount of residential and a similar number of commercial properties – both of which are limited in West Seattle. Our business would face great hardship if we had to leave West Seattle. The 4000 Delridge Way building is home to our family business and has provided hundreds of folks jobs over the years, forcing us to sell this property would be devastating as this building was designed and built to be a long-term investment with the highest quality of materials, including locally source wood siding and interior beams, as well as copper cladding. It is designed and built to last even in a changing climate. We have no intention of selling this property and would like to maintain it for generations to come.

It seems DEL-5 or DEL-6 are superior options generally, due to less neighborhood impact. DEL-5 and DEL-6 seem to be a more logical route for Sound Transit as per the table on Executive Summary ES-18 – the noise and visual impact would appear to be significantly less if DEL-6 was chosen above all other options. Furthermore DEL-5 only impacts 2 historical buildings and DEL-6 impacts 0, furthermore DEL-5 and DEL-6 have zero impacts on park and recreational resources, whereas the first four options impact a park and golf course. Additionally, the DEL-6 option is cheaper than the others making it a great choice since construction costs are rising at a dramatic rate. We disagree with the predicted ridership rates as maintaining the business district near the Delridge/Andover corner and adjacent buildings would increase ridership. The traffic impacts may be challenging and we will be prepared for those; however, a year or three of traffic inconveniences is a small sacrifice for being able to keep our building, particularly since we just went through a major upgrade to Delridge Way and have dealt with the more than two year closure of the West Seattle Bridge.

We implore you to please select DEL-5 and DEL-6 for the West Seattle Sound Transit route. Thank you.

Sincerely,

Jim Carlson  
Partner, Delridge Development LLC  
Owner, Building Envelope Technology and Research  
4000 Delridge Way SW  
Seattle, WA. 98106

### Owner(s):

Contact ID	Name	Type	Phones	Email
1079004	<a href="#">Jim Carlson</a>	Individual		<a href="mailto:jcarlson@bet-r.com">jcarlson@bet-r.com</a>

## Appendix O. Draft EIS Comment Summary and Response to Comments

### Communication ID: 504066– Delridge Development LLC, Jim Carlson Draft EIS Comment

#	Comments	Responses
1	<p>We respectfully urge that you select DEL-5 and DEL-6 for the West Seattle Sound Transit route. In reviewing the Draft EIS Executive Summary Delridge Segment (ES.3.1.1.3, page ES-13 - ES-18), it appears that the proposed options DEL-1a, DEL-1b, DEL-2a, DEL-2b, DEL-3, DEL-4 all impact the corner of Delridge and Andover. As part owner of the 4000 Delridge Way building, I strongly object to any of these four routes. When we built our building at 4000 Delridge Way the City of Seattle encouraged us to make it as nice as possible and required us to add the parking structure so as to improve the visual appearance of the Delridge/Andover corner. We have been good neighbors and helped to keep that part of the Delridge corridor a thriving business district. There are very few commercial buildings that would fit our needs and it would be devastating for our business and employee morale to have to leave West Seattle. The majority of our employees live in West Seattle. The selection of either DEL-5 or DEL-6 option would allow our unique office building to remain in this location and prevent any disruption to our thriving business. Options DEL-5 and DEL-6 would disrupt the fewest amount of residential and a similar number of commercial properties - both of which are limited in West Seattle. Our business would face great hardship if we had to leave West Seattle. The 4000 Delridge Way building is home to our family business and has provided hundreds of folks jobs over the years, forcing us to sell this property would be devastating as this building was designed and built to be a long-term investment with the highest quality of materials, including locally source wood siding and interior beams, as well as copper cladding. It is designed and built to last even in a changing climate. We have no intention of selling this property and would like to maintain it for generations to come. It seems DEL-5 or DEL-6 are superior options generally, due to less neighborhood impact. DEL-5 and DEL-6 seem to be a more logical route for Sound Transit as per the table on Executive Summary ES-18-the noise and visual impact would appear to be significantly less if DEL-6 was chosen above all other options. Furthermore DEL-5 only impacts 2 historical buildings and DEL-6 impacts 0, furthermore DEL-5 and DEL-6 have zero impacts on park and recreational resources, whereas the first four options impact a park and golf course.</p> <p>Additionally, the DEL-6 option is cheaper than the others making it a great choice since construction costs are rising at a dramatic rate.</p>	<p>Please see responses to CCG2, CC4.1a, CC4.3b, and CC4.4a in Table 7-1, in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Chapter 6, Alternatives Evaluation, of the Final EIS provides a comparison of key impact differences between alternatives.</p>
2	<p>We disagree with the predicted ridership rates as maintaining the business district near the Delridge/Andover corner and adjacent buildings would increase ridership. The traffic impacts may be challenging and we will be prepared for those; however, a year or three of traffic inconveniences is a small sacrifice for being able to keep our building, particularly since we just went through a major upgrade to Delridge Way and have dealt with the more than two year closure of the West Seattle Bridge.</p>	<p>Please see response to CC3d in Table 7-1. Please see Chapter 3, Transportation Environment and Consequences, of the Final EIS for more information about ridership and traffic impacts, which have been updated in the Final EIS.</p>





April 25, 2022

WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift

Sound Transit

401 S. Jackson St.

Seattle, WA 98104

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

Re: Comments on WSBLE Draft EIS

Dear Ms. Swift:

We are writing on behalf of Development Services of America, Inc., which is the owner of the property located at 4025 Delridge Way (TPN 7881500200) (the "Property") to provide comments on the Draft EIS for the WSBLE project. The Property is presently developed with a large office building and associated surface parking lots.

The very preliminary plans for various WSBLE alternative alignments appear to pass next to the building on the Property. We are concerned that the proximity of this construction work will result in adverse impacts to the Property.

Because the WSLBE plans are at such a preliminary stage, it is not possible for the Draft EIS to outline the likely impacts of the proposal in several areas that will affect the Property: traffic, congestion, noise, vibration, dust and odor and the like. It appears that major structural support columns for the elevated rail structure will nearly abut the building on the Property in one alternative, which raises serious concerns about impacts on the tenant experience in the building.

The Draft EIS must do a better job of characterizing these impacts and outlining realistic mitigation plans to avoid or eliminate these impacts.

Similarly, the proposed extended closures of nearby streets will impose extraordinary hardships on the Property. The Draft EIS should evaluate the impact of street closures, rather than just listing them, and explore alternatives to and mitigation for such closures.

Our specific comments are as follows:

- Construction delays from the WSBLE project could potentially parallel the impacts from the West Seattle bridge outage. Since the bridge closure, our marketing of vacant spaces in the building has been non-existent. We currently have a majority of tenants looking for avenues to relocate onto the main Seattle corridor to avoid traveling to our property due to a lack of viable and reliable vehicular/transit options. The WSBLE project will definitely be similar in its impact and this should be reviewed in the Draft EIS, together with mitigation proposals.
- Not discussed in the Draft EIS is the fact that the water table in that area of our building was extremely high during original construction. So much so, that we deleted the entire

[www.developmentservicesofamerica.com](http://www.developmentservicesofamerica.com)

East end of the basement parking garage due to the water table being higher than our finish slab depth. Adjacent construction by Sound Transit in the water table will require substantial dewatering and the groundwater levels are likely to magnify construction vibration effects. The Draft EIS should review these impacts and propose mitigation.

- Additionally, our understanding is that the geotechnical character of the area around the Property includes substantial fill areas. Construction by Sound Transit in these fill areas may amplify vibration and structural support issues for our building. The Draft EIS should review these potential impacts and propose mitigation as may be necessary.
- While light rail will be a positive for business users, the foot traffic to/from the elevated station will increase the need for rider parking. The area is drastically short of available parking for riders/users. We are concerned that surface parking and related enforcement on our parking lots will put an unnecessary strain on our resources. The Draft EIS should review these secondary parking impacts on the Property and the neighborhood.
- The overall effect of WSBLE on Delridge may be to turn it into a local commuter parking area for the new station. But the neighborhood has little in the way of pedestrian infrastructure and activating uses – therefore a lack of “eyes on the street.” This could exacerbate local issues of crime and security. The Draft EIS should carefully evaluate the likely impacts of the WSBLE project on these issues in Delridge.

Finally, you should be aware that the Property is benefited by a view easement over other nearby parcels. 8902150561, and 8902150562 are the recorded view easements referenced. Attached are recorded copies of each along with a visual mapping of the easement area described. This easement was specifically negotiated as part of the original acquisition of the building and is critical to its value. Some of the elevated rail alternatives will violate this view easement and the Draft EIS should evaluate these impacts as well.

In general, we support the Sound Transit project, but we are concerned that the Draft EIS does not describe the potential impacts or required mitigations of the WSBLE project on the Property and the Delridge neighborhood.

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

We appreciate the opportunity to provide these comments.

Sincerely,



Richard H Wilson  
President/CEO  
Development Services of America, Inc.  
PO Box 25139  
Scottsdale, AZ 85255  
Owners of West Seattle Corporate Center  
4025 Delridge Way SW  
Seattle, WA 98106

Att. \_\_\_\_\_

W SEATTLE FREEWAY

W SEATTLE FREEWAY

SW SPOKANE ST

EX A  
8902150561

EX A  
8902150562

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ADD TO WEST SEATTLE

GO STEINIS 1ST  
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ADD TO WEST SEATTLE

WINTER & MANNINGS  
ADD TO WEST SEATTLE

WEST SEATTLE  
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Southern Pacific  
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HASSLOCHER'S ADD  
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ADD TO WEST SEATTLE

T O N

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RECEIVED THIS DAY

FEB 15 11 31 AM '89  
BY THE DIVISION OF  
RECORDS & ELECTIONS  
KING COUNTY

When recorded return to:

Dieter Struzyna, Esq.  
3415 11th Ave. S.W.  
Seattle, WA 98134

FILED FOR RECORD AT REQUEST OF  
TRANSAMERICA TITLE  
INSURANCE COMPANY  
370 10th Ave. N.E.  
P.O. BOX 1493 89/02/15  
Bellevue, WA. 98009 RECD F  
CASHSL

10.00

#0560 OR

\*\*\*10.00  
55

SPACE ABOVE THIS LINE  
FOR RECORDER'S USE

**VIEW EASEMENT**

THIS EASEMENT (the "View Easement") is granted this 15th day of February, 1989, by SEATTLE STEEL, INC., a Washington corporation ("Grantor"), to TRADEWELL GROUP, INC., a Washington corporation, d/b/a Development Services of America ("Purchaser"), as successor in interest by merger to D&K Services, Inc.

RECITALS

A. Grantor owns the real property located in King County, Washington legally described on Exhibit "A" attached hereto (the "Grantor's Parcel" or the "View Easement Parcel"), and Purchaser owns the real property legally described on Exhibit "B" attached hereto (the "Benefitted Parcel").

B. Grantor wishes to grant to Purchaser and its successors in interest to the Benefitted Parcel and Purchaser wishes to receive an easement over and across Grantor's Parcel for the purposes of preserving a view.

FOR VALUABLE CONSIDERATION, the receipt and sufficiency of which are hereby acknowledged, Grantor and Grantee agree as follows:

1. Grant of Easement. Grantor hereby grants to Purchaser for so long as Purchaser is "owned or controlled" (50% or more) by a parent company which is owned or controlled by Mr. Tom Stewart of Vashon Island, Washington ("Mr. Stewart"), or any other entity which is owned or controlled by Mr. Stewart into which Purchaser transfers the Benefitted Parcel by transfer, consolidation, merger or reorganization (being hereinafter collectively referred to as "Grantee"), a nonexclusive, per-

By [Signature]  
Title Bonds Dept.

856923/654222-660  
8902150561

petual view easement appurtenant to and for the benefit of the Benefitted Parcel as follows:

For so long as any Grantee is the owner of the Benefitted Parcel, Grantor and its successors and assigns shall not, and are hereby barred from building or constructing or having built or constructed on the View Easement Parcel any improvement or structure (an "Improvement") which (i) has any portion of its structure greater than 20 feet in width perpendicular to a line running from the easterly most point of the Benefitted Parcel to the easterly most point of the Columbia Center Building, Seattle and (ii) extends more than 57 feet above the City of Seattle datum. Nothing in this View Easement shall be deemed to prohibit the erection of any temporary structures atop an Improvement for use in connection with repair of the Improvement, or to prohibit the use of cranes, towers or other such construction equipment which may be temporarily mounted atop an Improvement to perform repairs or other construction work.

2. Termination. This View Easement, including but not limited to the restrictions set forth in paragraph 1 above, shall automatically terminate and become null and void in the event the Benefitted Parcel is no longer owned by a Grantee. Nothing in this View Easement shall be construed to state that this View Easement, including but not limited to the restrictions set forth in paragraph 1 above, will terminate or be affected in any way by a transfer or other assignment of rights in the Benefitted Parcel among Grantees.

3. Subordination of Interests. All Grantees' rights under this View Easement are subordinate to any mortgage or deed of trust now or hereafter encumbering the view easement parcel and held by a party unrelated to Grantor. Grantee shall, within 25 days after receipt of a written request from Grantor or any successor in interest to Grantor's interest in the Grantor's Parcel or other party with an ownership interest in the Grantor's Parcel (the "Owner"), execute and deliver to Owner a document or documents in form and content acceptable to Owner and/or any mortgagee, lienholder or encumbranceholder unrelated to Owner ("Mortgagee"), containing language sufficient and necessary to confirm the subordination of Grantee's rights under this View Easement to any lien or encumbrance on the View Easement Parcel and/or any Improvement thereon in favor of a Mortgagee. The documents referred to in this paragraph 3 may, at Owner's request, include mortgage documents provided that any any such mortgage document explicitly states that Grantee execute it solely for the purpose of subordinating

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their interests derived pursuant to this View Easement, without assuming any liability whatsoever for the payment of the obligation secured thereby. Any such Mortgagee, upon foreclosure or transfer in lieu of foreclosure to the Grantor's Parcel shall be considered to have terminated all of the rights of Grantee under this View Easement.

4. Third-Party Rights. Grantor reserves all other rights with respect to the View Easement Parcel, including without limitation, the right to grant easements, licenses and permits to other subject to the rights granted in this View Easement.

5. Title. The rights granted in this View Easement are subject to all restrictions and reservations of record.

6. Running of Benefits and Burdens. None of the provisions in this View Easement, including the benefits and burdens, run with the land and are binding upon or shall inure to the benefit of any entity other than the Grantee. The burdens of this View Easement shall run to and be binding on the successors in interest of Grantor.

7. Notices. All notices required or permitted hereunder shall be in writing and shall be effective upon personal delivery to Grantor or Grantee or three (3) days after being deposited in the United States mail, registered or certified, return receipt requested, with postage fully prepaid and addressed to the respective parties as follows:

TO GRANTOR: Seattle Steel, Inc.  
P. O. Box C-3826  
Seattle, WA 98124

TO PURCHASER: Tradewell Group, Inc.  
3415 - 11th Avenue S.W.  
Seattle, WA 98134

Such addresses may be changed by written notice to the other party hereto.

8. Construction. This document shall be construed according to the laws of the State of Washington.

GRANTOR:

SEATTLE STEEL, INC., a Washington corporation

By Norman June  
Its ASSIST SECRETARY

8902150561

GRANTEE:

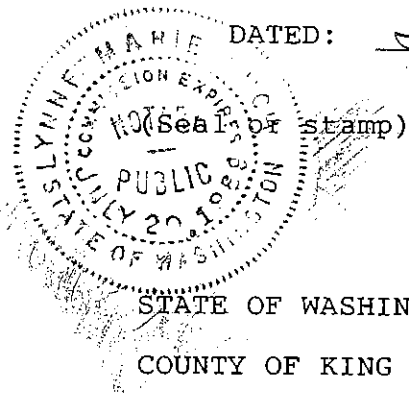
TRADEWELL GROUP, INC., a  
Washington corporation, d/b/a  
Development Services of America

By [Handwritten Signature]  
Its CEO

STATE OF WASHINGTON )  
                                  ) ss.  
COUNTY OF KING        )

I certify that I know or have satisfactory evidence that Norman Lunde signed this instrument, on oath stated that he was authorized to execute the instrument and acknowledged it as the Asst. Secretary of Seattle Steel, Inc. to be the free and voluntary act of said corporation for the uses and purposes mentioned in the instrument.

DATED: February 14, 1989.

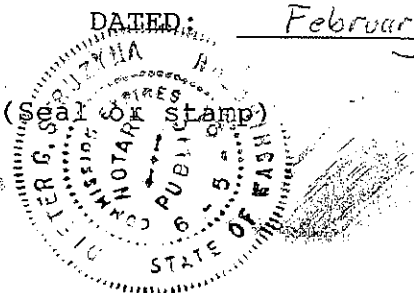


Marie Lusk  
Notary Public in and for the State of  
Washington, residing at Bellvue  
My appointment expires July 20, 1989

STATE OF WASHINGTON )  
                                  ) ss.  
COUNTY OF KING        )

I certify that I know or have satisfactory evidence that Thomas J. Stewart signed this instrument, on oath stated that he was authorized to execute the instrument and acknowledged it as the CEO of TRADEWELL GROUP, INC. to be the free and voluntary act of said corporation for the uses and purposes mentioned in the instrument.

DATED: February 14, 1989.



Peter N. Arayzma  
Notary Public in and for the State of  
Washington, residing at Clyde Hill  
My appointment expires 5/5/91



Those portions of Blocks 2 and 3 Faegre's Second Addition to West Seattle, according to the plat recorded in Volume 3 of Plats, page 51, records of King County, Washington, AND of Block 1 Star Addition to West Seattle, according to the plat recorded in Volume 3 of Plats, page 77, records of said County, AND of Block 425 Seattle Tide Lands, in said County, AND of vacated 24th and 25th Avenues S.W., AND of Government Lot 3, all in the northeast quarter of Section 13, Township 24 North, Range 3 East, W.M. in said county, described as follows:

8902150561  
 Beginning at the intersection of the northerly right-of-way margin of S.W. Andover Street with the northwesterly right-of-way margin of Delridge Way S.W. as condemned and acquired by the City of Seattle in Superior Court Cause No. 142193 pursuant to City of Seattle Ordinance No. 39638 as amended by City of Seattle Ordinance No. 41575; thence westerly, along said northerly margin of S.W. Andover Street, to an intersection with the westerly margin of said vacated 25th Avenue S.W.; thence northerly, along said westerly margin and its northerly production, to the southerly margin of S.W. Spokane Street as condemned and acquired by the City of Seattle in King County Superior Court Cause No. 582046, pursuant to City of Seattle Ordinance No. 90850; thence easterly and southeasterly, along said southerly margin and the southerly and southwesterly line of that certain tract of land deeded to the City of Seattle by deed filed under King County recording No. 8110260596, to an intersection with the westerly right-of-way margin of 23rd Avenue S.W. as condemned and acquired under Superior Court Cause No. 70716 pursuant to City of Seattle Ordinance No. 21767; thence southerly, along said westerly margin, to an intersection with the northwesterly right-of-way margin of aforesaid Delridge Way S.W.; thence southwesterly, along said margin, to an intersection with the south line of Lot 6, Block 1, said Star Addition; thence westerly, along said south line, to the southwest corner of said Lot 6; thence southerly, along the northerly production and the west line of Block 1, Gottstein's First Addition to West Seattle, according to the plat recorded in Volume 3 of Plats, page 68, records of said County, to an intersection with the northwesterly margin of aforesaid Delridge Way S.W.; thence southwesterly, along said northwesterly margin and along the northwesterly line of that certain tract conveyed to the City of Seattle for street purposes by deed contained in City of Seattle Lot Boundary Adjustment under Master Use Application No. 8606156 as filed under King County Recording No. 8706020779 to the Point of Beginning of the herein described tract;

EXCEPT that portion of said Government Lot 3, described as follows;

Beginning at a point on the northerly production of the west line of Block 3 of said Faegre's Second Addition which is 140 feet north of the northwest corner of said Block 3; thence east, along a line parallel with the north line of said Block 3, a distance of 81.64 feet, to the TRUE POINT OF BEGINNING; thence North 15.20 feet; thence East 18.36 feet to the west line of said Gottstein's First Addition to West Seattle; thence South, along said west line, 35.00 feet; thence West 18.36 feet; thence North 19.80 feet to the TRUE POINT OF BEGINNING;

ALSO, EXCEPTING THEREFROM, Parcel "A" as shown on aforesaid City of Seattle Lot Boundary Adjustment.

EXHIBIT B

DESCRIPTION:

PARCEL A:

ALL OF BLOCKS 1 AND 2 IN SOUTH HAVEN ADDITION TO WEST SEATTLE, AS PER PLAT RECORDED IN VOLUME 3 OF PLATS, PAGE 17, RECORDS OF KING COUNTY;

TOGETHER WITH THAT PORTION OF 25TH AVENUE SOUTHWEST LYING BETWEEN SAID BLOCKS 1 AND 2 AS VACATED BY CITY OF SEATTLE ORDINANCE NO. 88238 WHICH, UPON VACATION, ATTACHED TO SAID PROPERTY BY OPERATION OF LAW;

EXCEPT THE EAST 10 FEET OF SAID BLOCK 2 AS CONDEMNED FOR 24TH AVENUE SOUTHWEST (ALSO KNOWN AS DELRIDGE WAY SOUTHWEST) IN KING COUNTY SUPERIOR COURT CAUSE NO. 142193 AS PROVIDED BY CITY OF SEATTLE ORDINANCE NO. 39638 AND AMENDED BY CITY OF SEATTLE ORDINANCE NO. 41575;

SITUATE IN THE CITY OF SEATTLE, COUNTY OF KING, STATE OF WASHINGTON.

PARCEL B:

THOSE PORTIONS OF WHITE AND MANNING'S ADDITION TO WEST SEATTLE, AS PER PLAT RECORDED IN VOLUME 3 OF PLATS, PAGE 8, RECORDS OF KING COUNTY, DESCRIBED AS FOLLOWS:

LOTS 1 THROUGH 6 AND LOTS 43 THROUGH 48 IN BLOCK 1, LOTS 1 THROUGH 8, LOTS 43 THROUGH 45 AND THE WEST 10 FEET OF LOTS 46 THROUGH 48, ALL IN BLOCK 4;

SITUATE IN THE CITY OF SEATTLE, COUNTY OF KING, STATE OF WASHINGTON.

8902150561

RECEIVED THIS DAY

BY THE DIVISION OF  
RECORDS & ELECTIONS  
KING COUNTY

FEB 15 11 31 AM '89

When recorded return to:

Dieter Struzyna, Esq.  
3415 11th Ave. S.W.  
Seattle, WA 98134

FILED FOR RECORD AT REQUEST OF  
TRANSACTION FILE  
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320 10th Ave. N.E.

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SPACE ABOVE THIS LINE  
FOR RECORDER'S USE

VIEW EASEMENT

THIS EASEMENT (the "View Easement") is granted this 15th day of February, 1989, by SEATTLE COMMERCE CENTER - B, INC., a Washington corporation ("Grantor"), to TRADEWELL GROUP, INC., a Washington corporation, d/b/a Development Services of America ("Purchaser"), as successor in interest by merger to D&K Services, Inc.

RECITALS

A. Grantor owns the real property located in King County, Washington legally described on Exhibit "A" attached hereto (the "Grantor's Parcel" or the "View Easement Parcel"), and Purchaser owns the real property legally described on Exhibit "B" attached hereto (the "Benefitted Parcel").

B. Grantor wishes to grant to Purchaser and Purchaser wishes to receive, an easement over and across Grantor's Parcel for the purposes of preserving a view.

FOR VALUABLE CONSIDERATION, the receipt and sufficiency of which are hereby acknowledged, Grantor and Purchaser agree as follows:

1. Grant of Easement. Grantor hereby grants to Purchaser for so long as Purchaser is "owned or controlled" (50% or more) by a parent company which is owned or controlled by Mr. Tom Stewart of Vashon Island, Washington ("Mr. Stewart") or any other entity which is owned or controlled by Mr. Stewart into which Purchaser transfers the Benefitted Parcel by transfer, consolidation, merger or reorganization (being hereinafter collectively referred to as "Grantees"), a nonexclusive, perpetual view easement appurtenant to and for the benefit of the Benefitted Parcel as follows:

EXCISE TAX NOT REQUIRED

*[Signature]*  
Deputy

8902150562

For so long as any Grantee is the owner of the Benefitted Parcel, Grantor and its successors and assigns shall not, and are hereby barred from building or constructing or having built or constructed on the View Easement Parcel any improvement or structure (an "Improvement") which (i) has any portion of its structure greater than 20 feet in width perpendicular to a line running from the easterly most point on the Benefitted Parcel to the easterly most point of Columbia Center Building in Seattle and (ii) extends more than 57 feet above the City of Seattle datum. Nothing in this View Easement shall be deemed to prohibit the erection of any temporary structures atop an Improvement for use in connection with repair of the Improvement, or to prohibit the use of cranes, towers or other such construction equipment which may be temporarily mounted atop an Improvement to perform repairs or other construction work.

2. Termination. This View Easement, including but not limited to the restrictions set forth in paragraph 1 of this View Easement, shall automatically terminate and become null and void in the event the Benefitted Parcel is no longer owned by a Grantee. Nothing in this View Easement shall be construed to state that this View Easement, including but not limited to the restrictions set forth in paragraph 1 of this View Easement, will terminate or be affected in any way by a transfer or other assignment of rights in the Benefitted Parcel among Grantees.

3. Subordination of Interests. All Grantees' rights under this View Easement are subordinate to any mortgage or deed of trust now or hereafter encumbering the view easement parcel and held by a party unrelated to Grantor. Grantee shall, within 25 days after receipt of a written request from Grantor, any successor in interest to Grantor's interest in the Grantor's Parcel or other party with an ownership interest in the Grantor's Parcel (the "Owner"), execute and deliver to Owner a document or documents in form and content acceptable to Owner and/or any mortgagee, lienholder or encumbranceholder unrelated to Owner ("Mortgagee"), containing language sufficient and necessary to confirm the subordination of Grantees' rights under this View Easement to any lien or encumbrance on the View Easement Parcel and/or any Improvement thereon in favor of a Mortgagee. The documents referred to in this paragraph 3 may, at Owner's request, include mortgage documents provided that any such mortgage document explicitly states that Grantee execute it solely for the purpose of subordinating their interests derived pursuant to this View Easement, without assuming any liability whatsoever for the payment of the obligation secured thereby. Any such Mortgagee, upon foreclosure or transfer in lieu of foreclosure to the Grantor's Parcel

shall be considered to have terminated all of the rights of Grantee under this View Easement.

4. Third-Party Rights. Grantor reserves all other rights with respect to the View Easement Parcel, including without limitation, the right to grant easements, licenses and permits to others subject to the rights granted in this View Easement.

5. Title. The rights granted in this View Easement are subject to all restrictions and reservations of record.

6. No Running of Benefits and Burdens. None of the provisions in this View Easement, including the benefits and burdens, run with the land and are binding upon or shall inure to the benefit of any entity other than the Grantee. The burdens of this View Easement shall run to and be binding on the successors and assigns of Grantor.

7. Notices. All notices required or permitted hereunder shall be in writing and shall be effective upon personal delivery to Grantor or Grantee or three (3) days after being deposited in the United States mail, registered or certified, return receipt requested, with postage fully prepaid and addressed to the respective parties as follows:

TO GRANTOR: Seattle Commerce Center - B, Inc.  
Suite 2300 Skyline Tower  
10900 N.E. 4th Street  
Bellevue, WA 98004

TO PURCHASER: Tradewell Group, Inc.  
3415 - 11th Avenue S.W.  
Seattle, WA 98134

Such addresses may be changed by written notice to the other party hereto.

8. Construction. This document shall be construed according to the laws of the State of Washington.

GRANTOR:

SEATTLE COMMERCE CENTER - B,  
INC., a Washington corporation

By Dirck W. Armitage  
Its VP

8902150562

PURCHASER:

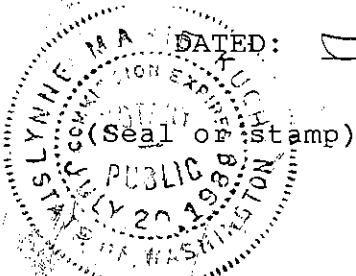
TRADEWELL GROUP, INC., a  
 Washington corporation, d/b/a  
 Development Services of America

By [Signature]  
 Its CEO

8902150562

STATE OF WASHINGTON )  
 ) ss.  
 COUNTY OF KING )

I certify that I know or have satisfactory evidence that Dirck Armitage signed this instrument, on oath stated that he was authorized to execute the instrument and acknowledged it as the Vice President of SEATTLE COMMERCE CENTER - B, Inc. to be the free and voluntary act of said corporation for the uses and purposes mentioned in the instrument.

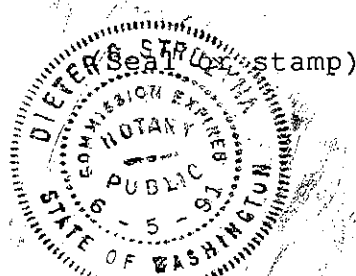


DATED: February 14, 1989.

[Signature]  
 Notary Public in and for the State of  
 Washington, residing at Bellvue  
 My appointment expires July 20, 1989

STATE OF WASHINGTON )  
 ) ss.  
 COUNTY OF KING )

I certify that I know or have satisfactory evidence that Thomas J. Stewart signed this instrument, on oath stated that he was authorized to execute the instrument and acknowledged it as the CEO of TRADEWELL GROUP, INC. to be the free and voluntary act of said corporation for the uses and purposes mentioned in the instrument.



DATED: February 14, 1989.

[Signature]  
 Notary Public in and for the State of  
 Washington, residing at Clyde Hill  
 My appointment expires 6/5/91

EXHIBIT A

DESCRIPTION:

Parcel A, City of Seattle Lot Boundary Adjustment (LBA) under Master use Application No. 8606156 as recorded under Recording No. 8706020779, being more particularly described as follows:

Those portions of Government Lot 3, Section 13, Township 24 North, Range 3 East W.M., AND of Blocks 2 and 3 of Faegre's Second Addition to West Seattle as per plat recorded in Volume 3 of Plats, Page 51, records of King County; AND of 24th Avenue S.W., as vacated by City of Seattle Ordinance No. 86320; AND of 25th Avenue S.W., as vacated by City of Seattle Ordinance Nos. 60208 and 88177, described as follows:

Beginning at the intersection of the Northerly right-of-way margin of S.W. Andover Street with the Northwesternly right-of-way margin of Delridge Way S.W. as condemned and acquired by the City of Seattle in Superior Court Cause No. 142193 pursuant to City of Seattle Ordinance No. 39638 as amended by City of Seattle Ordinance No. 41575;  
thence North 28°20'35" East, along said Northwesternly margin, 419.90 feet to an intersection with the Westerly line of Block 1 of Gottstein's First Addition to West Seattle, as per plat recorded in Volume 3 of Plats, Page 68, records of King County;  
thence North 01°57'40" East, along said Westerly line, 47.08 feet to an intersection with a line parallel with and 120.2 feet Northerly, from the North line of Block 3, said plat of Faegre's Section Addition;  
thence North 88°58'41" West, along said parallel line, 18.36 feet;  
thence North 01°57'40" East, parallel with said West line of Block 1 in Gottstein's First Addition, 35.00 feet;  
thence South 88°58'41" East, parallel with the North line of said Block 3 of Faegre's Second Addition, 18.36 feet to said West line of Block 1 of Gottstein's First Addition;  
thence North 01°57'40" East, along said West line and its Northerly production, 164.74 feet to an intersection with a line parallel with and 10.00 feet Southerly, from the centerline of S.W. Charlestown Street;  
thence North 88°58'41" West, along said parallel line, produced Westerly, 114.60 feet to a point of tangency with a 280 foot radius circular curve to the left;  
thence Westerly, along said curve, an arc distance of 137.46 feet through a central angle of 28°07'39";  
thence South 62°53'40" West 75.74 feet to a point of tangency with a 130 foot radius circular curve to the left;  
thence Southwesterly, along said curve an arc distance of 132.09 feet through a central angle of 58°13'06";  
thence South 04°40'34" West 257.17 feet to a point of tangency with a 580 foot radius circular curve to the left;

- continued -

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DESCRIPTION (continued):

thence Southerly, along said curve, an arc distance of 41.18 feet through a central angle of  $04^{\circ}04'03''$ ;  
thence South  $00^{\circ}36'31''$  West 146.90 feet, more or less, to an intersection with the Northerly right-of-way margin of said S.W. Andover Street;  
thence South  $88^{\circ}58'29''$  East, along said margin, 201.56 feet to the point of beginning

EXCEPT that portion conveyed to the City of Seattle for additional right-of-way along Delridge Way S.W., described as follows:

Beginning at the intersection of the Northerly right-of-way margin of said S.W. Andover Street with the Northwesternly right-of-way margin of said Delridge Way S.W.;

thence North  $28^{\circ}20'35''$  East, along said Northwesternly margin, 70.00 feet to the true point of beginning;

thence North  $23^{\circ}14'36''$  East 45.00 feet to an intersection with a line parallel with, and 4.00 feet Northwesternly from, the Northwesternly margin of said Delridge Way S.W.;

thence North  $28^{\circ}20'35''$  East along said parallel line 50.00 feet;

thence North  $30^{\circ}20'11''$  East 115.00 feet to an intersection with said Northwesternly margin;

thence South  $28^{\circ}20'35''$  West, along said Northwesternly margin, 209.75 feet to the true point of beginning;

Situate in the City of Seattle, County of King, State of Washington.

8902150562

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EXHIBIT B

DESCRIPTION:

PARCEL A:

ALL OF BLOCKS 1 AND 2 IN SOUTH HAVEN ADDITION TO WEST SEATTLE, AS PER PLAT RECORDED IN VOLUME 3 OF PLATS, PAGE 17, RECORDS OF KING COUNTY;

TOGETHER WITH THAT PORTION OF 25TH AVENUE SOUTHWEST LYING BETWEEN SAID BLOCKS 1 AND 2 AS VACATED BY CITY OF SEATTLE ORDINANCE NO. 88238 WHICH, UPON VACATION, ATTACHED TO SAID PROPERTY BY OPERATION OF LAW;

EXCEPT THE EAST 10 FEET OF SAID BLOCK 2 AS CONDEMNED FOR 24TH AVENUE SOUTHWEST (ALSO KNOWN AS DELRIDGE WAY SOUTHWEST) IN KING COUNTY SUPERIOR COURT CAUSE NO. 142193 AS PROVIDED BY CITY OF SEATTLE ORDINANCE NO. 39638 AND AMENDED BY CITY OF SEATTLE ORDINANCE NO. 41575;

SITUATE IN THE CITY OF SEATTLE, COUNTY OF KING, STATE OF WASHINGTON.

PARCEL B:

THOSE PORTIONS OF WHITE AND MANNING'S ADDITION TO WEST SEATTLE, AS PER PLAT RECORDED IN VOLUME 3 OF PLATS, PAGE 8, RECORDS OF KING COUNTY, DESCRIBED AS FOLLOWS:

LOTS 1 THROUGH 6 AND LOTS 43 THROUGH 48 IN BLOCK 1, LOTS 1 THROUGH 8, LOTS 43 THROUGH 45 AND THE WEST 10 FEET OF LOTS 46 THROUGH 48, ALL IN BLOCK 4;

SITUATE IN THE CITY OF SEATTLE, COUNTY OF KING, STATE OF WASHINGTON.

8902150562

## Appendix O. Draft EIS Comment Summary and Response to Comments

### Communication ID: 504320 - Development Services of America Draft EIS Comment

#	Comments	Responses
1	We are concerned that the proximity of this construction work will result in adverse impacts to the Property. Because the WSLBE plans are at such a preliminary stage, it is not possible for the Draft EIS to outline the likely impacts of the proposal in several areas that will affect the Property: traffic, congestion, noise, vibration, dust and odor and the like. It appears that major structural support columns for the elevated rail structure will nearly abut the building on the Property in one alternative, which raises serious concerns about impacts on the tenant experience in the building. The Draft EIS must do a better job of characterizing these impacts and outlining realistic mitigation plans to avoid or eliminate these impacts.	Please see the following sections of the West Seattle Link Extension Final EIS for more information: Section 4.3, Economics, regarding impacts to businesses during construction; Section 4.7, regarding noise and vibration impacts during operations and construction; and Appendix L4.6, Air Quality, for information on air quality best management practices during construction.
2	Similarly, the proposed extended closures of nearby streets will impose extraordinary hardships on the Property. The Draft EIS should evaluate the impact of street closures, rather than just listing them, and explore alternatives to and mitigation for such closures.	Please see Section 3.11, Construction Impacts, of Chapter 3, Transportation Environment and Consequences, of the Final EIS for more information regarding road closures and traffic impacts during construction. This section also discusses additional mitigation measures identified for the preferred alternative.
3	Construction delays from the WSBLE project could potentially parallel the impacts from the West Seattle bridge outage. Since the bridge closure, our marketing of vacant spaces in the building has been non-existent. We currently have a majority of tenants looking for avenues to relocate onto the main Seattle corridor to avoid traveling to our property due to a lack of viable and reliable vehicular/transit options. The WSBLE project will definitely be similar in its impact and this should be reviewed in the Draft EIS, together with mitigation proposals.	Please see Section 4.3, Economics, of the Final EIS for more information on impacts to businesses during construction. Chapter 5, Cumulative Impacts, discusses cumulative impacts to businesses from the West Seattle Bridge closure that occurred from March 2020 to September 2022 and from the West Seattle Link Extension Project.
4	Not discussed in the Draft EIS is the fact that the water table in that area of our building was extremely high during original construction. So much so, that we deleted the entire East end of the basement parking garage due to the water table being higher than our finish slab depth. Adjacent construction by Sound Transit in the water table will require substantial dewatering and the groundwater levels are likely to magnify construction vibration effects. The Draft EIS should review these impacts and propose mitigation. • Additionally, our understanding is that the geotechnical character of the area around the Property includes substantial fill areas. Construction by Sound Transit in these fill areas may amplify vibration and structural support issues for our building. The Draft EIS should review these potential impacts and propose mitigation as may be necessary.	Your information on groundwater and geological conditions is appreciated. The Final EIS does not document conditions for individual properties, but mapping of geologic conditions and hazards is provided in Appendix L4.11, Geology and Soils. Sound Transit has completed geotechnical borings along the project corridor as well as reviewed information from past geotechnical borings in the area and will take these conditions into account as design of the West Seattle Link Extension advances. Please see Section 7 of Appendix N.4, Noise and Vibration Technical Report, for information on mitigation for potential construction vibration impacts, including pre-construction surveys of buildings near construction areas.
5	While light rail will be a positive for business users, the foot traffic to/from the elevated station will increase the need for rider parking. The area is drastically short of available parking for	Please see Section 3.4, Affected Environment and Impacts during Operation—Transit, of Chapter 3,

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	riders/users. We are concerned that surface parking and related enforcement on our parking lots will put an unnecessary strain on our resources. The Draft EIS should review these secondary parking impacts on the Property and the neighborhood. The overall effect of WSBLE on Delridge may be to turn it into a local commuter parking area for the new station.	Transportation Environment and Consequences, of the West Seattle Link Extension, for information on station mode of access. Approximately 85 to 90 percent of riders accessing this station would be bus transfers. See Section 3.6, Affected Environment and Impacts during Operation—Parking, for information on parking impacts, including the potential for "hide-and-ride" and proposed mitigation.
6	But the neighborhood has little in the way of pedestrian infrastructure and activating uses - therefore a lack of "eyes on the street." This could exacerbate local issues of crime and security. The Draft EIS should carefully evaluate the likely impacts of the WSBLE project on these issues in Delridge.	Please see Section 4.14, Public Services, Safety, and Security, of the Final EIS for more information on safety in station areas.
7	you should be aware that the Property is benefited by a view easement over other nearby parcels. 8902150561, and 8902150562 are the recorded view easements referenced. Attached are recorded copies of each along with a visual mapping of the easement area described. This easement was specifically negotiated as part of the original acquisition of the building and is critical to its value. Some of the elevated rail alternatives will violate this view easement and the Draft EIS should evaluate these impacts as well.	Please see Section 4.1, Acquisitions, Displacements, and Relocations, of the Final EIS for more information on the property acquisition process. While impacts to easements on private property are not discussed, compensation for loss of use for easements would be negotiated during the property acquisition process where applicable.
8	In general, we support the Sound Transit project, but we are concerned that the Draft EIS does not describe the potential impacts or required mitigations of the WSBLE project on the Property and the Delridge neighborhood. We therefore suggest that Sound Transit prepare a supplement to the Draft EIS that fully describes the WSBLE project and evaluates all impacts associated with the proposal.	Please see response to CCG1 in Table 7-1 in Chapter 7, Comment Summary, of the Final EIS.

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April 27, 2022

To: Sound Transit  
From: Chuck LeFevre, Owner  
Esquin Wine & Spirits and Esquin Wine Storage

Regarding: SODO Station Development - West Seattle Ballard Link Extension

To Whom It May Concern:

Esquin Wine & Spirits and Esquin Wine Storage are located at 2700 4<sup>th</sup> Avenue South, at the corner of 4<sup>th</sup> Avenue South and South Lander. Esquin has been in business in SODO for over 50 years and has over 20,000 customers. We were relocated to our present location in 1998 by the Public Facilities District when they were building the Seattle Mariners stadium. We lost hundreds of thousands of dollars relocating and rebuilding our business and almost didn't survive. That was before we had the wine storage business with its 550 storage lockers that are rented out to customers. Moving all those customers one at a time is unimaginable. It would be disruptive, incredibly labor intensive and very costly.

Esquin is an important part of Seattle's and SODO's history. Requiring us to move again would jeopardize both businesses.

I urge you to find a less disruptive alternative to taking the 2700 4<sup>th</sup> Avenue South building for your project.

Thank you for your consideration in this very important matter.

## Appendix O. Draft EIS Comment Summary and Response to Comments

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### Communication ID: 503091 – Esquin, Chuck LeFevre Draft EIS Comment

#	Comments	Responses
1	<p>We were relocated to our present location in 1998 by the Public Facilities District when they were building the Seattle Mariners stadium. We lost hundreds of thousands of dollars relocating and rebuilding our business and almost didn't survive. That was before we had the wine storage business with its 550 storage lockers that are rented out to customers. Moving all those customers one at a time is unimaginable. It would be disruptive, incredibly labor intensive and very costly.</p> <p>Esquin is an important part of Seattle's and SODO's history. Requiring us to move again would jeopardize both businesses. I urge you to find a less disruptive alternative to taking the 2700 4th Avenue South building for your project.</p>	<p>Sound Transit acknowledges the inconvenience and hardship of relocating a residence or business. Please see response to CC4.1a in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS.</p>

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)

*Re: WSBLE DEIS Comments on Avalon Station and Potential Cost-Cutting Measures*

Dear Ms. Swift,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (“DEIS”) for Sound Transit’s voter-approved West Seattle Ballard Link Extension (“WSBLE”).

HB Management (“HB”) is a business and investment management entity of the Hewson and Breiner family offices. It manages over \$3 billion of multifamily real estate and has a track record of developing large scale apartment projects, including high rise apartments in downtown Seattle and midrise apartments across Seattle’s neighborhoods. HB is a key developer of transit-oriented residential apartments and has delivered nearly 500 homes adjacent to light rail in Roosevelt (approximately 100 of which have an income restriction through MFTE) with another 530+ permitted and ready for construction over a total of seven major projects. All of these units are within a quarter mile of the light rail stop, with hundreds just across the street. We are strong believers in creating housing opportunities, including affordable housing, near transit.

One of HB’s latest ventures is a partnership with the Sweeney Family to develop two blocks of the Alki Lumber property in West Seattle. Specific concerns about WSBLE’s impacts on that project are separately addressed in a comment letter submitted by Lynn Sweeney, and are incorporated herein by this reference. As detailed in that Letter, we have significant concerns with the potential impacts of Alternative WSJ-1 on the project, which could include access interruptions and demolition of recently constructed housing for construction laydown. Sound Transit must take a closer look at those potential impacts in the Final Environmental Impact Statement (“FEIS”) and consider construction alternatives that would not displace housing.

Beyond the concerns expressed in that Letter, HB is writing separately to emphasize the importance of the Avalon Station to WSBLE’s success. The DEIS Transportation Technical Report (“Report”) notes that the Avalon Station can expect only 1,200 average daily riders under all alternatives in 2042, but we believe this number significantly understates likely ridership given the several thousand additional apartment units that are being conceived within the quarter mile radius in anticipation of that Station. See Report at 3-16. The West Seattle “Triangle” neighborhood, which the Avalon Station abuts, will experience significant growth over the next decade plus. Looking at current zoning versus existing uses shows a significant mismatch and potential for redevelopment. Aside from the 500+ unit Alki Lumber project, we have property

interests and partnership plans for development of at least four additional sites, representing approximately 600 additional units within a quarter mile of the Avalon Station or closer. None of these potential units are reflected in the pipeline project list disclosed in DEIS Appendix K. There are also other sites poised for redevelopment, but only a fraction of the potential units would be likely if the Station is removed. These reasonably foreseeable pipeline development projects and potential housing impacts should be fully considered in the FEIS and the next steps in the Sound Transit Board's review.

Removal of the Avalon Station from the final alignment has been identified as a potential cost-cutting measure, but we do not think this is the right path. It is vital that Sound Transit consider the likelihood of a denser Triangle neighborhood as it evaluates the final WSBLE alignments and any cost-cutting measures. It is also essential that Sound Transit consider the impacts on removing the Avalon Station on the lower income and predominantly BIPOC communities further up 35<sup>th</sup> Avenue such as in High Point. These communities are counting on easy access to light rail via a direct route on 35<sup>th</sup> from the Avalon Station, and they will be disproportionately impacted by a deletion of their most convenient future station. Sound Transit must make any future cost-cutting decisions through an equity lens and justify why its decisions will not have a disproportionate impact on lower income and BIPOC communities.

Sound Transit should especially plan for the Triangle neighborhood of the future. However, at the very least, if Sound Transit does advance potential removal of the Avalon Station as an alternative, then it must fully consider the impacts of this compared to its retention on all elements of the environment. Additionally, if the Avalon Station is removed, then Sound Transit should reconsider the West Seattle Junction Station locations and propose a new tunnel alternative with a station location north of the existing plans either near the Trader Joe's or the Les Schwab Tire Center that would better serve Triangle, Junction, and Upper 35<sup>th</sup> Avenue residents. These additional alternatives should be studied in a supplement to the DEIS that is published for an additional public comment period prior to moving on to the FEIS and Sound Transit Board action on the alignment.

We are strong supporters of transit, and have a track record of working with Sound Transit to make true transit-oriented-development a reality. We implore you to fully consider the neighborhood ramifications of removing the Avalon Station from WSBLE and, if the Station must be cut, to consider alternatives that would adequately serve future riders from the Triangle and Upper 35<sup>th</sup> neighborhoods. Thank you for your diligent efforts on behalf of our region to strengthen our transportation system and make WSBLE a reality.

Sincerely,

Ed Hewson, HB Management



**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504307 - HB Management Draft EIS Comment**

#	Comments	Responses
1	One of HB's latest ventures is a partnership with the Sweeney Family to develop two blocks of the Alki Lumber property in West Seattle. Specific concerns about WSBLE's impacts on that project are separately addressed in a comment letter submitted by Lynn Sweeney, and are incorporated herein by this reference.	Your concern regarding impacts has been noted. A separate response has been provided for the letter from Lynn Sweeney.
2	we have significant concerns with the potential impacts of Alternative WSJ-1 on the project, which could include access interruptions and demolition of recently constructed housing for construction laydown. Sound Transit must take a closer look at those potential impacts in the Final Environmental Impact Statement ("FEIS") and consider construction alternatives that would not displace housing.	Please see responses to CCG1, CCG2, and CC4.1b in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS.
3	HB is writing separately to emphasize the importance of the Avalon Station to WSBLE's success. The DEIS Transportation Technical Report ("Report") notes that the Avalon Station can expect only 1,200 average daily riders under all alternatives in 2042, but we believe this number significantly understates likely ridership given the several thousand additional apartment units that are being conceived within the quarter mile radius in anticipation of that Station. See Report at 3-16. The West Seattle "Triangle" neighborhood, which the Avalon Station abuts, will experience significant growth over the next decade plus. Looking at current zoning versus existing uses shows a significant mismatch and potential for redevelopment. Aside from the 500+ unit Alki Lumber project, we have property interests and partnership plans for development of at least four additional sites, representing approximately 600 additional units within a quarter mile of the Avalon Station or closer. None of these potential units are reflected in the pipeline project list disclosed in DEIS Appendix K. There are also other sites poised for redevelopment, but only a fraction of the potential units would be likely if the Station is removed. These reasonably foreseeable pipeline development projects and potential housing impacts should be fully considered in the FEIS and the next steps in the Sound Transit Board's review.	Your support of an Avalon Station is noted. Please see response to CC2j in Table 7-1. Project ridership is based on the Sound Transit Ridership Model, which includes regional growth assumptions approved by Puget Sound Regional Council. These growth assumptions account for planned growth in regional and locally designated growth centers, which includes the West Seattle Junction Hub Urban Village where the proposed Sweeney development is located. Please see Chapter 3, Transportation Environment and Consequences, of the Final EIS for updated ridership estimates. Please see Chapter 5, Cumulative Impacts, of the Final EIS for more information on reasonable foreseeable future actions.  Appendix K, Present and Future Development, Transportation, and Public Works Projects in the Study Area, reflects information on projects that have submitted land use or construction permits to the City of Seattle. This list has been updated for the Final EIS.
4	Removal of the Avalon Station from the final alignment has been identified as a potential cost-cutting measure, but we do not think this is the right path. It is vital that Sound Transit consider the likelihood of a denser Triangle neighborhood as it evaluates the final WSBLE alignments and any cost-cutting measures. It is also essential that Sound Transit consider the impacts on removing the Avalon Station on the lower income and predominantly BIPOC communities further up 35th Avenue such as in High Point. These communities are counting on easy access to light rail via a direct route on 35th from the Avalon Station, and they will be disproportionately impacted by a deletion of their most convenient future station. Sound Transit must make any future cost-cutting decisions through an equity lens and justify why its decisions will not have a	Please see response to CC2j in Table 7-1. A new alternative that would not include the Avalon Station, Alternative WSJ-6, has been added to the Final EIS and is evaluated for all elements of the environment. Appendix G, Environmental Justice, includes evaluation of this alternative relative to low-income populations and communities of color.

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>disproportionate impact on lower income and BIPOC communities. Sound Transit should especially plan for the Triangle neighborhood of the future. However, at the very least, if Sound Transit does advance potential removal of the Avalon Station as an alternative, then it must fully consider the impacts of this compared to its retention on all elements of the environment.</p>	
5	<p>Additionally, if the Avalon Station is removed, then Sound Transit should reconsider the West Seattle Junction Station locations and propose a new tunnel alternative with a station location north of the existing plans either near the Trader Joe's or the Les Schwab Tire Center that would better serve Triangle, Junction, and Upper 35th Avenue residents. These additional alternatives should be studied in a supplement to the DEIS that is published for an additional public comment period prior to moving on to the FEIS and Sound Transit Board action on the alignment.</p>	<p>Alternative WSJ-6, studied in the Final EIS, would not include an Avalon Station and would have a new tunnel alignment between the Delridge Station and the Alaska Junction Station, but would locate the Alaska Junction Station on 41st Avenue Southwest. This location was identified by the Sound Transit Board as the preferred station location in July 2022, based on comments received on the WSBLE Draft EIS. The proposed Sweeney development would be within this Alaska Junction Station 10-minute walkshed. Please see Section 6, Non-motorized Transportation, of Appendix N.1, Transportation Technical Report, for more information on walksheds.</p>

## Sound Transit Projects - Communications (1 Total)

**Search Term**

500837

**Communication ID: 500837**

**Communication ( 4/20/2022 )**

ILWU Local 19 supports the Sound Transit Board's preferred "South Crossing Alternative ". The impacts to jobs and port operations from the "North Crossing Alternative " are severe and we strongly oppose it.

Thank You,

Herald Ugles

President ILWU Local 19

**Owner(s):**

Contact ID	Name	Type	Phones	Email
<a href="#">1075459</a>	<a href="#">Herald Ugles</a>	Individual		<a href="mailto:president@ilwulocal19.org">president@ilwulocal19.org</a>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

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**Communication ID: 500837 – ILWU Local 19 Draft EIS Comment**

#	Comments	Responses
1	ILWU Local 19 supports the Sound Transit Board's preferred "South Crossing Alternative ". The impacts to jobs and port operations from the "North Crossing Alternative " are severe and we strongly oppose it.	Please see response to CCG2 in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS.



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

## WSBLE Draft Environmental Impact Statement Comments

April 26, 2022

This is in response to the Draft EIS for the West Seattle and Ballard Link Extensions. My comments are specific to the Duwamish section of this project, specifically how they impact the Jim Clark Marina.

Looking at the information in the Draft EIS I find that there is very little information on impacts to the Jim Clark Marina for alternative DUW1a or DUW1b. Alternative DUW1b indicates that the marina would be displaced but provides no detail of how. Information on construction impacts for either alternative is not included. My specific comments are as follows:

### **Alternative DUW1a**

#### Construction Impacts

- It appears that construction of the Duwamish span may limit access to our marina. This is not mentioned at all.
- It appears the construction of the Duwamish span may require relocation of utilities including power, water and phone lines. This would disrupt the marina but there is no information on this in the Draft EIS.
- It appears that construction of the Duwamish span will certainly limit parking and again there is no discussion of this impact.

#### Possible Permanent impacts

- Jim Clark Marina leases property located on Terminal 102 from the Port of Seattle for access to our docks. The drawings seem to show right of way that is part of Terminal 102. There is no mention of buying property from the Port or if you do, what would happen to our lease. We prefer to continue our lease from the Port rather than having to split the lease between the Port and Sound Transit.

Mitigation was not mentioned with any of the impacts for DUW1a. We request that the following be included in the Final EIS:

- With the buildings be demolished east of us in Terminal 102 it would be simple to provide parking and safe access to the marina during construction. This mitigation needs to be included in the Final EIS.

- Mitigation of utilities that are to be moved that are used by Jim Clark Marina need to be specified in the Final EIS.
- Information on property takes in Terminal 102 needs to be specific in the Final EIS.

**Alternative DUW1b**

- Section 4.2.3 Economics notes that this option would displace Jim Clark Marina. There are no specifics of what the taking is. It appears in the drawings that the impact is the location of the pier in the river that would displace several boathouses. This needs to be explained since there may be mitigation available.
- Loss of moorage needs to be discussed since there are no available alternative moorages for most of the boats at Jim Clark Marina anywhere in the area. If Jim Clark Marina was to be closed the only reasonable mitigation would be to move it to other Port properties. This needs to be addressed in the Final EIS.

Sincerely,



Robert A. Josephson

President Duwamish Waterway Association

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 505010 - Jim Clark Marina Draft EIS comment**

#	Comments	Responses
1	<p>Alternative DUW1a Construction Impacts It appears that construction of the Duwamish span may limit access to our marina. This is not mentioned at all. It appears the construction of the Duwamish span may require relocation of utilities including power, water and phone lines. This would disrupt the marina but there is no information on this in the Draft EIS. It appears that construction of the Duwamish span will certainly limit parking and again there is no discussion of this impact. Possible Permanent impacts Jim Clark Marina leases property located on Terminal 102 from the Port of Seattle for access to our docks. The drawings seem to show right of way that is part of Terminal</p> <p>102. There is no mention of buying property from the Port or if you do, what would happen to our lease. We prefer to continue our lease from the Port rather than having to split the lease between the Port and Sound Transit. Mitigation was not mentioned with any of the impacts for DUW1 a. We request that the following be included in the Final EIS: With the buildings be demolished east of us in Terminal 102 it would be simple to provide parking and safe access to the marina during construction. This mitigatoin needs to be included in the Final EIS1. Mitigation of utilities that are to be moved that re used by Jim Clark Marina need to be specified in the Final EIS. Information on property takes in Terminal 102 needs to be specific in the Final EIS.</p>	<p>Additional information about construction of Preferred Alternative DUW-1a and potential impacts on maritime businesses has been added to Section 4.3, Economics, of the West Seattle Link Extension Final EIS. Sound Transit has coordinated with the Port of Seattle regarding impacts to businesses located at Terminal 102 and mitigation for loss of parking during construction.</p>
2	<p>Alternative DUW1b Section 4.2.3 Economics notes that this option would displace Jim Clark Marina. There are no specifics of what the taking is. It ppears in the drawings that the impact is the location of the pier in the river that: would displace several boathouses. This needs to be explained since there may be mitigation available. Loss of moorage needs to be discussed since there are no available alternative moorages for most of the boats at Jim Clark Marina anywhere in the area. If Jim Clark Marina was to be closed the only reason ble mitigation would be to move it to other Port properties. This needs to be addressed in the Final EIS.</p>	<p>The WSLBE Draft EIS and Final EIS assume that the entire Jim Clark Marina would be displaced for construction of Alternative DUW-1b. If the Sound Transit Board selects this alternative as the project to be built, Sound Transit would coordinate with the marina to determine if a portion of the marina could remain at the current location and/or to identify a relocation site. As described in Section 4.3, Economics, of the Final EIS, this marina is one of multiple water-dependent businesses that could be difficult to relocate, and some businesses may not be able to be relocated.</p>

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April 27, 2022

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

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

RE: WSBLE Draft Environmental Impact Statement Comments

Dear Ms. Swift:

These comments focus on the need for thoughtful station planning and people friendly density around the stations.

Sound Transit must seek well designed stations that embrace this density and activity, with safety features and easily understood access.

Clearly light rail can be a catalyst, a high-capacity transportation system, that promotes personal and community activities and business endeavors while improving the environment.

Each station location along the line must embrace a form of transit-oriented development (TOD) - to the highest extent possible to insure these outcomes. A station can't just be a transit stop. TOD has an edge that over time will help the system attract more riders by allowing people to work and live in close proximity employment, services and opportunity.

**Station success:**

To achieve this shared vision the DEIS needs to:

Encourage the City of Seattle and other cities to establish and confirm land uses and zoning that enables and promotes high-density mixed-use around all stations in the proposed system - embracing jobs, business, support services of the future. Together with access to market-rate and affordable housing for that work force.

Commit to and work with these cities, business interests and stakeholders to ensure such high-density transit-oriented development supports equitable job creation.

Make it clear to Seattle and other cities that success of light rail and stations along the line depend on such support. Understanding future business uses and space demand will not be those of the past but a combination of technology (including light industrial), med tech, R&D, office, education, support retail and housing.

**Partnering:**

In addition, the DEIS must promote and commit to facilitating partnering with property owners and stakeholders, the cities and other transit providers at station locations to enable and increase design outcomes.

**Infrastructure improvements:**

Sound Transit must be conditioned to identify, quantify and commit to meaningful:

Investment in road and access improvements that interact with the stations, business and neighborhoods impacted by Sound Transit's work.

Installation of safety features within the walk shed of the stations.

- Sidewalks
- Lighting
- Pedestrian crossings
- Road improvements
- Bicycle Paths

Moving and siting the combined SODO light rail Station South as depicted in the At-Grade South Station Option (SODO 1b) with direct connection to South Lander is an example of such a community and access improvement.

**Community engagement:**

During construction, Sound Transit must commit to establishing an office in each community where impacted parties can gain access to support and leadership to respond to the needs of business and community during the expected years of disruption.

**Mitigating Traffic and Improving Use:**

Need for further evaluation and development of case studies showing the positive impacts/outcomes of density, increased activity and resulting mitigated traffic around light rail stations:

Produce supportive arguments using available experiential data from other urban markets. Assume this work will find increase in density and transit-oriented development (TOD) can and does improve safety and reduces single occupant vehicle impacts and usage. Will confirm robust use of the light rail and its connection to other transit, walking, and nonmotorized usage by the people working, living and energizing the space, will mitigate density impacts, which also can help with housing-to-job imbalance identified in the DEIS. And settle the fact the most well-designed stations, in the middle of nowhere serving a sparse employment base lacking density encouragement, will struggle for riders and success – with no hope to truly improving safety, reducing traffic nor adequately serving the community at large.

The studies will surely show supporting prioritization of pedestrian access, transit operations, and bike routes also mitigate density.

All stations must be evaluated. There are others but the existing SODO station (the most underutilized station in the system) represents an example of avoiding density and neighborhood planning - that needs attention.

Thank you for considering my thoughts.

Sincerely,



Mark A Weed

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504839 - Main Street Equity Partners Draft EIS Comment**

#	Comments	Responses
1	<p>Station success: To achieve this shared vision the DEIS needs to: Encourage the City of Seattle and other cities to establish and confirm land uses and zoning that enables and promotes high- density mixed-use around all stations in the proposed system - embracing jobs, business, support services of the future. Together with access to market-rate and affordable housing for that work force. Commit to and work with these cities, business interests and stakeholders to ensure such high-density transit-oriented development supports equitable job creation. Make it clear to Seattle and other cities that success of light rail and stations along the line depend on such support.</p> <p>Understanding future business uses and space demand will not be those of the past but a combination of technology (including light industrial), med tech, R&amp;D, office, education, support retail and housing.</p>	<p>Zoning in station areas is determined by the City of Seattle. Both agencies have been coordinating regarding transit-oriented development opportunities that are consistent with the City's land use plans. Please see Section 4.2, Land Use, of the West Seattle Link Extension Final EIS for more information on land use and transit-oriented development.</p>
2	<p>Partnering: In addition, the DEIS must promote and commit to facilitating partnering with property owners and stakeholders, the cities and other transit providers at station locations to enable and increase design outcomes.</p>	<p>Please see Appendix F, Public Involvement, Tribal Consultation, and Agency Coordination, of the Final EIS for information on the outreach and coordination activities conducted in this phase of the West Seattle Link Extension Project. Sound Transit will continue to work with the community as final design advances and the details of construction plans are defined. See Section 4.3.7, Mitigation Measures, for more detail on how Sound Transit would coordinate with the community.</p>
3	<p>Infrastructure improvements: Sound Transit must be conditioned to identify, quantify and commit to meaningful: Investment in road and access improvements that interact with the stations, business and neighborhoods impacted by Sound Transit's work. Installation of safety features within the walk shed of the stations. Sidewalks Lighting Pedestrian crossings Road improvements Bicycle Paths Moving and siting the combined SODO light rail Station South as depicted in the At-Grade South Station Option (SODO 1b) with direct connection to South Lander is an example of such a community and access improvement.</p>	<p>Sound Transit will continue to work with the City of Seattle and stakeholders regarding station access improvements and amenities as the station planning and design process advances. Please see Section 2.1, Build Alternatives, of the Final EIS for discussion of modifications made to the SODO Station for the preferred alternative, as well as discussion of potential station area access improvements.</p>
4	<p>Community engagement: During construction, Sound Transit must commit to establishing an office in each community where impacted parties can gain access to support and leadership to respond to the needs of business and community during the expected years of disruption.</p>	<p>Section 4.3, Economics, of the Final EIS describes the mitigation measures for impacts to businesses and communities during construction.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
5	<p>Mitigating Traffic and Improving Use: Need for further evaluation and development of case studies showing the positive impacts/outcomes of density, increased activity and resulting mitigated traffic around light rail stations: Produce supportive arguments using available experiential data from other urban markets. Assume this work will find increase in density and transit-oriented development (TOD) can and does improve safety and reduces single occupant vehicle impacts and usage. Will confirm robust use of the light rail and its connection to other transit, walking, and nonmotorized usage by the people working, living and energizing the space, will mitigate density impacts, which also can help with housing-to-job imbalance identified in the DEIS. And settle the fact the most well-designed stations, in the middle of nowhere serving a sparse employment base lacking density encouragement, will struggle for riders and success - with no hope to truly improving safety, reducing traffic nor adequately serving the community at large. The studies will surely show supporting prioritization of pedestrian access, transit operations, and bike routes also mitigate density. All stations must be evaluated. There are others but the existing SODO station (the most underutilized station in the system) represents an example of avoiding density and neighborhood planning - that needs attention.</p>	<p>Please see response to CC3a in Table 7-1 in Chapter 7, Comment Summary, of the Final EIS. See responses to comments 1 and 2 above.</p>

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## Sound Transit Projects - Communications (1 Total)

Search Term

500099

### **Communication ID: 500099 - Alexis Chartouni Court Reporter Draft EIS Comment**

Communication ( 3/30/2022 )

Alexis Chartouni Court Reporter Draft EIS Comment

Hi there. Thank you, everybody. My name's Alexis Chartouni. I represent Legacy Partners and USAA Real Estate Group. We have recently completed a project at Fauntleroy and Alaska called Maris Apartments. It consists of 244 units of market-rate housing and approximately 64 affordable, income-restricted housing. Currently, the preferred alternative for the Alaska Junction station requires Sound Transit to condemn and demolish all 306 residential units as well as possibly impacting our neighbor to the south, The Huxley, which has approximately 150 units. I think that this preferred alternative has the most impact to residential housing in the West Seattle neighborhood, an area that's already chronically short of housing. This is the wrong approach. The location should be at the Alaska Junction. Further, the ST3 that was approved by voters identified the junction as the location for this station. If you go through Appendix M of the draft EIS, you'll also see that Fauntleroy was actually ruled out as a location of the station, so I'm not quite sure why it was promoted as the preferred option when it appears to have been not selected as the route that should be taken. So, again, the EIS is flawed, and the impact to housing is too severe for the Fauntleroy location. Thank you. I'm done.

Owner(s):

Contact ID	Name	Type	Phones	Email
<a href="#">1074925</a>	<a href="#">Alexis Chartouni</a>	Individual		

## Appendix O. Draft EIS Comment Summary and Response to Comments

### Communication ID: 500099 – Maris Apartments, Alexis Chartouni Draft EIS Comment

#	Comments	Responses
1	<p>Currently, the preferred alternative for the Alaska Junction station requires Sound Transit to condemn and demolish all 306 residential units as well as possibly impacting our neighbor to the south, The Huxley, which has approximately 150 units. I think that this preferred alternative has the most impact to residential housing in the West Seattle neighborhood, an area that's already chronically short of housing. This is the wrong approach. The location should be at the Alaska Junction. Further, the ST3 that was approved by voters identified the junction as the location for this station. If you go through Appendix M of the draft EIS, you'll also see that Fauntleroy was actually ruled out as a location of the station, so I'm not quite sure why it was promoted as the preferred option when it appears to have been not selected as the route that should be taken. So, again, the EIS is flawed, and the impact to housing is too severe for the Fauntleroy location.</p>	<p>Please see responses to CCG2 and CC4.4b in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. As described in Appendix M, Summary of Alternatives Development and Initial Assessment Process, of the Final EIS, an alternative on Fauntleroy Way Southwest was not carried forward, which is different than an alternative with a station on Fauntleroy Way Southwest.</p>



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.

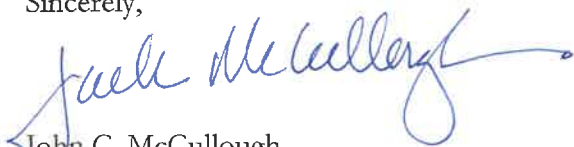
#### **F. Conclusion**

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  
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cc: City of Seattle  
Downtown Seattle Association

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504777 - McCullough Hill Leary, PS Draft EIS Comment**

#	Comments	Responses
1	<p>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 The WSBLE proposal is not adequately</p>	<p>Please see responses to CCG1, CC2a, CC2b, and CC3c in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>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</p> <p>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. 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</p>	
2	<p>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</p>	<p>Please see response to CC2a in Table 7-1.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	of mitigation should occur now, when such plans are subject to public comment, not when public comment is closed	
3	<p>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; ii 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.</p>	Please see response to CCG1 in Table 7-1.
4	<p>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</p>	Please see responses to CCG1 and CC2b in Table 7-1.

## Appendix O. Draft EIS Comment Summary and Response to Comments

#	Comments	Responses
	appropriately adopting a "worst case" analysis for all impacts described in the Draft EIS.	
5	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.	Please see responses to CCG1, CCG2, CC2a, and CC2b in Table 7-1.
6	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.	Please see Section 4.2, Land Use, of the Final EIS for more information on the indirect impacts of the project on land use, including housing development. Section 4.3, Economics, of the Final EIS discusses the indirect economic impacts of the project.
7	<p>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.</p> <p>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</p>	A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>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.</p>	
8	<p>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</p>	<p>Please see response to CC2b in Table 7-1. Information on construction sequencing and the duration of construction for major construction activities was provided in the WSBL Draft EIS. The Draft EIS also stated that there would be periods of time when minimal or less intensive construction activity would occur. The Draft EIS stated that construction phases, sequencing, and schedule would be developed during final design and included in a work-specific construction plan.</p>
9	<p>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.</p>	<p>Please see responses to CC3c and CC3d in Table 7-1.</p>

## Appendix O. Draft EIS Comment Summary and Response to Comments

#	Comments	Responses
10	<p>ii. 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.</p>	<p>Please see response to CC3c in Table 7-1.</p>
11	<p>v. 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.</p>	<p>Please see response to CC3c in Table 7-1. Information on construction road closures, key streets used for detours, and mitigation was included in the WSBLE Draft EIS. A response to this comment related to construction truck traffic in Downtown Seattle will be provided as part of the environmental review process for the Ballard Link Extension.</p>
12	<p>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.</p>	<p>Information on impacts to parking and traffic congestion during construction was included in the WSBLE Draft EIS. Please see Section 3.11, Construction Impacts, of the Final EIS for more information on the impact of construction of the project on street operations and parking supply. Mitigation measures are also discussed in this section.</p>
13	<p>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.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
14	<p>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.</p>	<p>Information on impacts to pedestrian and bicycle facilities and mitigation for impacts was included in the WSBLE Draft EIS. Please see Section 3.7, Affected Environment and Impacts</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

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		<p>during Operation—Nonmotorized Facilities, and Section 3.11, Construction Impacts, of the Final EIS for more information on the impact of the project on pedestrian and bicycle facilities. Mitigation measures are also discussed in these sections. A response to this comment regarding the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.</p>
15	<p>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.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
16	<p>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</p>	<p>Businesses that choose to relocate prior to the Sound Transit acquisition process would not be eligible for relocation benefits; therefore, it may not be to their advantage to relocate based on speculation of property acquisition. Please see Section 4.3, Economics, of the Final EIS for more information on mitigation for businesses that could be impacted by construction activities. Sound Transit requires contractors to fence off construction sites and to provide site security. A response to this comment related to the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.</p>



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17	<p>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.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
18	<p>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.</p>	<p>Information on construction noise impacts and noise variances was included in the WSBLE Draft EIS. Please see Section 4.7, Noise and Vibration, and Appendix N.3, Noise and Vibration Technical Report of the Final EIS for more information on construction noise impacts and noise variances, including best management practices that would be used to minimize impacts.</p>
19	<p>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.</p> <p>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&amp;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.</p>	<p>Please see response to CC4.3b in Table 7-1. Information on potential construction impacts to businesses and effects on tax revenues from property acquisition, and proposed mitigation measures was included in the WSBLE Draft EIS. Please see Section 4.3, Economics, of the Final EIS for information regarding potential construction impacts to businesses and effects on tax revenues from property acquisition, and proposed mitigation measures. Although business displacements due to property acquisition would have an immediate impact, construction activities would create a new source of sales tax for years. See Chapter 2, Alternatives Considered, of the Final EIS for information on construction timelines. A response to this comment regarding the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.</p>

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20	<p>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.</p> <p>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 4th and 5th 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 5th &amp; Pike, 5th &amp; Pine and 4th &amp; 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 1950s 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.</p> <p>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.</p>	<p>Please see responses to CC2f and CC4.5a in Table 7-1. Please see Sections 4.1, Acquisitions, Displacements, and Relocations; 4.2, Land Use; and 4.3, Economics, of the Final EIS for more information on the economic and land use impacts of the station entrances. A response to this comment related to Ballard Link Extension guideway and stations will be provided as part of the environmental review process for the Ballard Link Extension.</p>
21	<p>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</p>	<p>Please see responses to CC2f, CC4.2a, and CC4.4b in Table 7-1. The Final EIS does not include potential residential, business, or employee displacements from future projects or other impacts to future projects as direct impacts from the West Seattle Link Extension unless a project is under construction at the time the Final EIS is being prepared.</p>

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	<p>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 4th Avenue S. • The loss of 1000 units of housing and other commercial space at the 4C site on 4th 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 5th &amp; 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. 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.</p>	<p>Please see Appendix L4.1, Acquisitions, Displacements, and Relocations, of the Final EIS for more information on displacements included as direct impacts. A response to this comment related to properties in the Ballard Link Extension study area will be provided as part of the environmental review process for the Ballard Link Extension.</p>
22	<p>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 3rd &amp; 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</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
23	<p>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</p>	<p>The West Seattle Link Extension is part of regional and local planning efforts to focus growth in urban growth centers connected by high-capacity transit. The West Seattle Link Extension would help fulfill these plans and would support planned growth. These regional and local plans have undergone programmatic SEPA review prior to adoption and future individual projects in the study area will undergo project level SEPA review. A response to this comment regarding the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.</p>

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<p>24</p>	<p>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:</p> <ul style="list-style-type: none"> <li>• Transportation</li> <li>• 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.</li> <li>• Limit street closures during peak traffic hours</li> <li>• Monitor vehicle and transit travel times through Downtown. Implement changes to street closures or other mitigation measures to mitigate impacts.</li> <li>• Establish a Traffic Mitigation Contingency Fund to provide financial support for future mitigation.</li> <li>• Truck routes should be monitored and modified in real-time so as to minimize impacts</li> <li>• Implement key mitigation measures in advance of expected congestion:</li> <li>• Operate a downtown shuttle system with access priority to move commuters through areas of high congestion</li> <li>• Invest in bike lane improvements</li> <li>• Deploy traffic control personnel throughout Downtown</li> <li>• Provide subsidies to Metro to enhance transit service through Downtown</li> <li>• Install real-time digital signage for transit and commute vehicles to alert drivers to areas of congestion</li> <li>• Urban design standards</li> <li>• 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 I Bellevue Land Use Code (municipal.codes)</li> <li>• In order to preserve street-level areas for pedestrian activation, all farebox activities should occur below grade</li> <li>• 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.</li> <li>• In all cases, the footprint of station entrance houses should be minimized.</li> <li>• Station entrance houses should include street level uses</li> <li>• Station entrance houses should include transparency above the ground level</li> <li>• Venting standards should be implemented to avoid impacts to pedestrians and residents</li> <li>• Aerial structures, from top to bottom, should exhibit a high level of architectural design</li> <li>• CPTED principles should be incorporated into project design</li> <li>• 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</li> <li>• Noise</li> <li>• Allow night work away from residential locations, subject to appropriate mitigation</li> <li>• Provide guidelines on the use of noise variances, including limits on noise variance requests within 2 blocks of residential uses or other sensitive receptors</li> <li>• Vibration</li> <li>• Provide for real-time measurement of off-site vibration impacts</li> <li>• Develop a site-specific plan for mitigation of vibration impacts for sensitive locations</li> <li>• Pedestrian environment /Local businesses</li> <li>• Sound Transit should fund \$1 million/year for downtown activation, to be administered by the Downtown</li> </ul>	<p>Please see responses to CCG1, CC2a, CC2f, CC3c, CC4.3b, and CC4.7a in Table 7-1. These mitigation suggestions were considered for inclusion in the Final EIS. Mitigation measures are detailed in Chapter 3, Transportation Environment and Consequences, and Chapter 4, Affected Environment and Environmental Consequences, for all alternatives and in Appendix I, Mitigation Plan, for the preferred alternatives for the Final EIS.</p>
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**Appendix O. Draft EIS Comment Summary and Response to Comments**

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	<p>Seattle Association. • Implement a "Lunch Downtown" program for WSBLE 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 WSBLE project. • Adopt an interpretive approach to construction-area signage and outreach. Celebrate and explain the WSBLE 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 &amp; 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.</p> <p>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.</p>	
25	<p>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</p>	<p>Please see response to CCG1 in Table 7-1. All alternatives studied in the WSBLE Draft EIS are included in the Final EIS, and a final decision on the project to be built will not be made until after the Final EIS. A comment summary of all comments received on the WSBLE Draft EIS was provided to the Sound Transit board, along with copies of all comments, prior to their decision on the preferred alternative following the WSBLE Draft EIS public review period.</p>

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	<p>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.</p>	<p>Comment was also allowed at Sound Transit Board meetings prior to board action on the preferred alternative. A response to this comment regarding the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.</p>
26	<p>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.</p>	<p>Thank you for expressing support for the project. Please see response to CCG1 in Table 7-1. A response to this comment regarding the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.</p>

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.

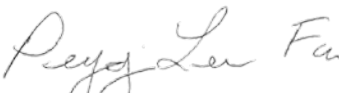
Sound Transit should prioritize station design in these areas that:

- 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,



Peggi Lewis Fu

Executive Director

NAIOP Washington State

## Appendix O. Draft EIS Comment Summary and Response to Comments

### Communication ID: 503067 - NAIOP Washington State Draft EIS Comment

#	Comments	Responses
1	<p>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.</p>	<p>Thank you for expressing support for the project. Please see response to CCG3 in Table 7-1, Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS.</p>
2	<p>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.</p>	<p>Please see responses to CC2b and CC3c in Table 7-1. Please see Section 4.3, Economics, of the Final EIS for more information on business displacements, construction impacts to businesses, and proposed mitigation. Mitigation for impacts to businesses during construction includes development of detailed construction management plans. See Section 3.11, Construction Impacts, of the Final EIS for more information on transportation impacts from the project during construction and Chapter 5, Cumulative Impacts, for impacts from the project in combination with other reasonably foreseeable future actions.</p>
3	<p>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:</p> <ul style="list-style-type: none"> <li>• Impacts on transit routes during construction.</li> </ul>	<p>Please see response to CC2a in Table 7-1. A response to the comments on impacts in Downtown Seattle and the Chinatown-International District will be provided as part of the environmental review process for the Ballard Link Extension.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>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. • 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.</p>	
4	<p>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.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
5	<p>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.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
6	<p>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.</p>	<p>Information on the City of Seattle's Industrial and Maritime Strategy has been added to Section 4.2, Land Use, of the Final EIS.</p>
7	<p>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:</p> <ul style="list-style-type: none"> <li>• Creatively and positively integrate into the existing environment by employing design principles that are minimally invasive to the existing neighborhood character;</li> <li>• Avoid displacement and condemnation by exploring opportunities for public/ private partnerships and maximizing below-grade station functions</li> <li>• At bare minimum ensures station configuration and footprints are tailored specifically to support a dense urban core environment.</li> </ul> <p>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.</p>	<p>Please see response to CC2f in Table 7-1.</p>

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April 13, 2022

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

Via Email: [WSBLEDEIScomments@soundtransit.org](mailto:WSBLEDEIScomments@soundtransit.org)

Ms. Swift:

Nucor Steel Seattle appreciates the opportunity to comment on the draft environmental impact statement for the proposed West Seattle and Ballard Link Extensions Project. This letter addresses our two major concerns with the project's Delridge Segment; station location and construction related impacts on mill operations.

Nucor has been an important part of the West Seattle community since 1905. Nucor Seattle is one of the most efficient steel mills in the country providing construction projects throughout the Pacific Northwest with responsibly produced steel products. The mill provides more than three hundred direct living wage jobs and supports more than a thousand industrial, maritime and transportation jobs in the Puget Sound region. Nucor is also Washington State's largest recycler.

Nucor supports Sound Transit and the development of the West Seattle and Ballard Link Extension Project. We have followed the project closely over the years and submitted detailed EIS scoping comments in 2019. Nucor staff also participated on the Stakeholders Advisory Group that vetted four of the Delridge Segment Station Alternatives. Two of the options, DEL-5, and DEL-6, were added by the Sound Transit Board after the SAG work was completed. We do not take a position on all of the options included in the DEIS but instead focus our comments on those options that have a direct and negative impact on our business.

Station Placement:

The DEIS presents six alternatives and two design options in the Delridge Segment. Four of the options follow Delridge Way Southwest and Southwest Genesee Street and two are on the north side of Southwest Genesee Street. The two alternatives, DEL-5 and DEL-6 that are further north near SW Andover Street would be the most disruptive to mill operations and cause considerable harm to our business.

Both DEL-5 and DEL-6 propose an elevated station slightly north of SW Andover Street and west of Delridge Way SW in the commercial business park directly east of Nucor. From there the line turns due west and runs directly over the heavily used truck entrance to the mill and continues up SW Andover Street where it crosses mill property, requiring using a portion of our property to accommodate guide columns.

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In addition to the impacts on the mill entrance and property, these two options would also generate a significant increase in transit, pedestrian, and bike traffic at the intersection of Delridge Way and SW Andover which is critical to truck and freight movement. Freight movement at that intersection is already challenging and the addition of even more transit, bicycle and pedestrian traffic would not only further constrain our ability to move freight but also potentially create safety risks.

Because both of these station options eliminate the existing truck entrance, construction of a new entrance to the mill would be required. However, given the configuration of the mill property, together with the impacts to the Delridge Way/Andover intersection and the light rail line running along Delridge Way, a dedicated freight corridor from the mill onto the West Seattle Bridge or West Marginal Way for the more than one hundred trucks a day that move in and out of the mill would be required.

Construction Related Impacts:

Our other major concern is with construction related impacts. The DEIS reports that all of the Delridge Station locations will have impacts to Delridge Way during construction. Partial closures ranging from 9 months to 3 years, with full closure on nights and weekends, are expected.

The DEIS does not provide a great deal of detail regarding which portions of Delridge will be closed or the expected closure times but given the various proposed station locations it is clear that any closures could have a significant impact on the mill given our 24/7 365 days a year operation. Also, because the mill operates on weekends to capture lower Seattle City Light power rates available at that time shutting down on weekends would have a significant fiscal impact on the company. Not only would full closures on nights and weekends during construction not be feasible, but our ability to continue operations during the construction period, without interruption, is essential if we are to remain competitive in a very challenging global marketplace and an important part of the Seattle economy. At a minimum, a dedicated truck and freight route would be required.

Thank you for considering our concerns as you prepare the final EIS.

Sincerely,



Matthew J. Lyons  
Vice President and General Manager  
Nucor Steel Seattle, Inc.



## Appendix O. Draft EIS Comment Summary and Response to Comments

### Communication ID: 500429 - Nucor Steel Draft EIS comment

#	Comments	Responses
1	Nucor supports Sound Transit and the development of the West Seattle and Ballard Link Extension Project.	Thank you for expressing support for the West Seattle Link Extension and the Ballard Link Extension projects.
2	<p>Station Placement: The DEIS presents six alternatives and two design options in the Delridge Segment. Four of the options follow Delridge Way Southwest and Southwest Genesee Street and two are on the north side of Southwest Genesee Street. The two alternatives, DEL-5 and DEL-6 that are further north near SW Andover Street would be the most disruptive to mill operations and cause considerable harm to our business. Both DEL-5 and DEL-6 propose an elevated station slightly north of SW Andover Steel and west of Delridge Way SW in the commercial business park directly east of Nucor. From there the line turns due west and runs directly over the heavily used truck entrance to the mill and continues up SW Andover Street where it crosses mill property, requiring using a portion of our property to accommodate guide columns. In addition to the impacts on the mill entrance and property, these two options would also generate a significant increase in transit, pedestrian, and bike traffic at the intersection of Delridge Way and SW Andover which is critical to truck and freight movement. Freight movement at that intersection is already challenging and the addition of even more transit, bicycle and pedestrian traffic would not only further constrain our ability to move freight but also potentially create safety risks. Because both of these station options eliminate the existing truck entrance, construction of a new entrance to the mill would be required. However, given the configuration of the mill property, together with the impacts to the Delridge Way/ Andover intersection and the light rail line running along Del ridge Way, a dedicated freight corridor from the mill onto the West Seattle Bridge or West Marginal Way for the more than one hundred trucks a day that move in and out of the mill would be required.</p>	Please see response to CCG2 in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Sound Transit has met with Nucor regarding the preferred alternative station refinements to understand potential impacts to Nucor and to design a solution that would minimize disruption to Nucor's operations. Sound Transit will continue to coordinate with Nucor during final design and construction.
3	<p>Construction Related Impacts: Our other major concern is with construction related impacts. The DEIS reports that all of the Del ridge Station locations will have impacts to Delridge Way during construction. Partial closures ranging from 9 months to 3 years, with full closure on nights and weekends, are expected. The DEIS does not provide a great deal of detail regarding which portions of Delridge will be closed or the expected closure times but given the various proposed station locations it is clear that any closures could have a significant impact on the mill given our 24/7 365 days a year operation. Also, because the mill operates on weekends to capture lower Seattle City Light power rates available at that time shutting down on weekends would have a significant fiscal impact on the company. Not only would full closures on nights and weekends during construction not be feasible, but our ability to continue operations during the construction period, without interruption, is essential if we are to remain competitive in a very challenging global marketplace and an important part of the Seattle economy. At a minimum, a dedicated truck and freight route would be required.</p>	Detailed information on road closures can be found in Appendix N.1, Transportation Technical Report, of the Final EIS. Please see Section 3.11, Construction Impacts, of the Final EIS for information on construction period impacts to freight. See Section 4.3, Economics, of the Final EIS for information on impacts to businesses during construction and proposed mitigation. Sound Transit would develop a Construction Access and Traffic Management Plan for the project for whichever Build Alternative is selected to be built.

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April 15, 2022

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

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

**Re: West Seattle and Ballard Link Extensions Draft EIS Comment**

Pacific Iron & Metal Co., also known as Pac Iron, is a family-operated, 105-year-old industrial metal recycling facility located at 2230 4th Ave S in Seattle. We are one of the largest metal recyclers in the region, and the only one primarily focused on non-ferrous metals serving Seattle, Bellevue and the surrounding communities. Thanks to our global network of consumers curated from 100-plus years of relationship-making in the industry, we are uniquely positioned to serve our public, private and governmental partners with their critical metal recycling needs.

We have operated at our location in SODO for more than 80 years, serving many of the public agencies and large companies that are integral to the region's economy. Pac Iron handles millions of pounds of non-ferrous metal each month for clients in both the private and public sector, including, but not limited to, Puget Sound Energy, City of Tacoma, Seattle City Light, Snohomish County PUD, the City of Mercer Island, the US Coast Guard, Sound Transit, and countless others. We also serve hundreds of the region's machine shops and other manufacturers that supply critical aerospace and marine parts both for defense contracts and commercial business. All of these partners expect and must have our service available without interruption. In an extremely mature industry, our location at the nexus of I-5 and I-90 and our proximity to the Port of Seattle are critical to our ability to efficiently serve the needs of our customers.

Our location is also home to two sister businesses, Seattle's Doorhouse and Pacific Fabrics. Pacific Fabrics is a beloved retail store for the sewing community, and Seattle's Doorhouse is the go-to location for homeowners and contractors looking for reasonably-priced and reliable doors with a quick delivery. Across our three businesses, we employ more than 70 people in family-wage jobs.

Our facility will be significantly impacted by the construction and operation of the West Seattle Link Extension project. Although any option that minimizes the footprint of our operation, which is heavily dependent on volume, is difficult to bear, we would like to express a strong preference for Option 1b, the At-Grade South Station Option. This alternative minimizes the risk of either partial or full acquisition and will be the least impactful to our facility's highly complex stormwater system permitted through King County.

We are only able to enjoy the privilege of conducting metal recycling in the City of Seattle due to our significant and ongoing investment in a state-of-the-art stormwater treatment system. The system's location, including holding tanks

and sampling ports, are primarily located on the southern edge of our property, an area potentially affected by every proposed design option for the new SODO station. Any adjustments to our stormwater system will likely require the consent of King County under our existing permit. We are extremely concerned about our ability to continue operations, and the decision ultimately centers on an open question as to Sound Transit's authority over King County to mitigate any needed changes to our facility's stormwater system.

As noted above, our location allows us to receive and process materials efficiently from partners across the state. If required to relocate, finding a comparable location that both provides the access the facility currently enjoys and satisfies all the stormwater permitting system requirements as detailed above will be extremely difficult, if not impossible, and will incur significant mitigation costs. More importantly, such a move could jeopardize the dozens of family-wage, industrial jobs generated by our work. Seattle's Doorhouse and Pacific Fabrics are each subsidized significantly by Pac Iron and would struggle to exist without it. Finally, a disruption to our business would have significant downstream effects to hundreds of public and private partners who rely on our service.

While still creating concerns for much needed space at our processing facility and presenting significant challenges with respect to redesigning our stormwater treatment system, Option 1-b is the least impactful of the designs presented in the Draft EIS. This is because 1-b requires acquisition of the least square footage of our critical processing facility and appears to avoid affecting our baler, which is the most critical piece of machinery to conducting our operations.

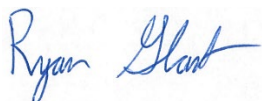
We recognize the logistical and other challenges involved in choosing an option that could require moving the USPS facility from its current location. We ask the Board of Directors to consider moving Option 1-b forward as the preferred alternative while the environmental review process continues, allowing ST staff and others time to consider potential solutions to the issue.

We are also aware that neighboring properties, as well as the SODO BIA, prefer Option 1-b as well. We all see the proximity of a future station to Lander St. as exponentially improving the usability of the dual stations and view this option as a potential once-in-a-lifetime opportunity to develop something more forward-thinking on the USPS site.

Thank you for your time and consideration of our comments. Considering the impact this project will have to Pac Iron and other industrial processing facilities in SODO, I urge you to seriously consider recommending Option 1b for further environmental review.

Sincerely,

Ryan Glant



CEO/President

Pacific Iron & Metal  
2230 4th Ave S  
Seattle, WA 98134  
rglant@paciron.com  
(206) 628-6242

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 500561 - Pacific Iron & Metal Draft EIS comment**

#	Comments	Responses
1	<p>Our facility will be significantly impacted by the construction and operation of the West Seattle Link Extension project. Although any option that minimizes the footprint of our operation, which is heavily dependent on volume, is difficult to bear, we would like to express a strong preference for Option 1b, the At-Grade South Station Option. This alternative minimizes the risk of either partial or full acquisition and will be the least impactful to our facility's highly complex stormwater system permitted through King County. We are only able to enjoy the privilege of conducting metal recycling in the City of Seattle due to our significant and ongoing investment in a state-of-the-art stormwater treatment system. The system's location, including holding tanks and sampling ports, are primarily located on the southern edge of our property, an area potentially affected by every proposed design option for the new SODO station. Any adjustments to our stormwater system will likely require the consent of King County under our existing permit. We are extremely concerned about our ability to continue operations, and the decision ultimately centers on an open question as to Sound Transit's authority over King County to mitigate any needed changes to our facility's stormwater system. As noted above, our location allows us to receive and process materials efficiently from partners across the state. If required to relocate, finding a comparable location that both provides the access the facility currently enjoys and satisfies all the stormwater permitting system requirements as detailed above will be extremely difficult, if not impossible, and will incur significant mitigation costs. More importantly, such a move could jeopardize the dozens of family-wage, industrial jobs generated by our work. Seattle's Doorhouse and Pacific Fabrics are each subsidized significantly by Pac Iron and would struggle to exist without it. Finally, a disruption to our business would have significant downstream effects to hundreds of public and private partners who rely on our service. While still creating concerns for much needed space at our processing facility and presenting significant challenges with respect to redesigning our stormwater treatment system, Option 1-b is the least impactful of the designs presented in the Draft EIS. This is because 1-b requires acquisition of the least square footage of our critical processing facility and appears to avoid affecting our baler, which is the most critical piece of machinery to conducting our operations. We recognize the logistical and other challenges involved in choosing an option that could require moving the USPS facility from its current location. We ask the Board of Directors to consider moving Option 1-b forward as the preferred alternative while the environmental review process continues, allowing ST staff and others time to consider potential solutions to the issue. We are also aware that neighboring properties, as well as the SODO BIA, prefer Option 1-b as well. We all see the proximity of a future station to Lander St. as exponentially improving the usability of the dual stations and view this option as a potential once-in-a-lifetime opportunity to develop something more forward-thinking on the USPS site. Thank you for your time and consideration of our comments. Considering the impact this project will have to Pac Iron and other industrial processing facilities in SODO, I urge you to seriously consider recommending Option 1b for further environmental review.</p>	<p>Information on the difficulty of relocating Pacific Iron and Metal has been added to Section 4.3, Economics, of the West Seattle Link Extension Final EIS. Between the WSLBE Draft EIS and the Final EIS, a new station option has been added in the SODO Segment (Preferred Option SODO-1c), and the Sound Transit Board has identified this option as the preferred alternative. Preferred Option SODO-1c would minimize impacts to your property. Please see Section 2.1.1, Sound Transit Board Direction on Modified EIS Alternatives, of the Final EIS for more information on the Sound Transit Board Motion and refinements to alternatives following the WSLBE Draft EIS comment period. The Sound Transit Board will select the project to be built after the Final EIS is prepared. Please see responses to CC4.1a and CC4.1d in Table 7-1 in Chapter 7, Comment Summary, of the Final EIS.</p>

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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



**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504751 - Pacific Merchant Shipping Association Draft EIS Comment**

#	Comments	Responses
1	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.	Impacts to water-dependent businesses were discussed in Sections 4.2.3 and 4.3.3 of the WSBLE Draft EIS. Additional information regarding impacts on maritime trade and manufacturing has been added to Section 4.3, Economics, in the West Seattle Link Extension Final EIS. A response to this comment related to the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.
2	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.	Additional discussion of impacts on freight mobility in the SODO Segment has been added to Section 3.10, Affected Environment and Impacts during Operation—Freight Mobility and Access, and Section 3.11, Construction Impacts, of the Final EIS. Discussion of cumulative effects to both Manufacturing and Industrials Centers has been added to Chapter 5, Cumulative Impacts. A response to this comment related to the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.
3	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.	Please see response to CCG2 in Table 7-1, Comment Summary, of the Final EIS.
4	Interbay/Ballard Segment As described in the DEIS, the current Preferred Elevated 14th 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 th Avenue Station Option as the preferred alternative.	A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.

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Sound Transit - West Seattle and Ballard Link Extension (WSBLE)  
Comments to the Draft Environmental Impact Statements (EIS)

To: Jason Hampton, HCT Developmental Manager - Sound Transit  
Lora Radford, Project Specialist - Sound Transit

From: Paul Utigard, Trustee of Newton Family Trust – Co Manager of Riverside Mill LLC  
Jeff Landstrom, - Co Manager of Riverside Mill LLC

Re: Riverside Mill – 3800 West Marginal Way SW. Seattle WA “the Property”

Date: April 28, 2022

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**Basic Property Information;**

The Property is located at **3800 West Marginal Way SW, Seattle WA. 98106** and is owned fee simple by Riverside Mill LLC. The Total property size is 271,281 sf. It has 11 connected buildings that total 112,770 sf of leasable area. The Property has six industrial, market rent tenants, with commercial long-term leases. The total of six tenants occupy 100% of the Leasable area. In addition to the industrial Leases, Riverside Mill also has two contracts for private moorage on a licensed floating dock on the Duwamish River. The 120 ft dock also supports serves the Maritime Tenants as access to loading and unloading from the Duwamish River. This includes a 60ton crane with an arm reach to the dock. The Property has 3 separate access/egress points to West Marginal Way SW. The limited south access is thru an easement over BNSF property, the mid access is near the middle of the property and the North access is directly under the West Seattle Bridge at the northern property line. Both the Northern and Mid access points will be impacted by the Port of Seattle Terminal 5 improvements. The Ports improvements are proposing the closing of the mid access point and the improvement of the North access by adding a full lighted intersection, designed with dedicated turn lanes for truck traffic. These roadway improvements are to begin later in 2022/23. The Northern access point also allows vehicular/truck traffic to the bypass road which travels from the North edge of the Riverside Mill thru the Port of Seattle and allows truck to bypass the train in case of a blockage/restriction to West Marginal Way. The Property also has over 150,000 square feet of Yard. The Yard provides storage full circulation to all buildings which is critical for the types of tenants that occupy Riverside Mill.

**Description of Tenants;**

**United Motor Freight (UMF);** Trucking company that specializes in extra Long and Heavy Loads. Logistically located near the Port of Seattle and contains a custom warehouse heavily used by the Port of Seattle. UMF is a maritime business that uses the Duwamish River for many of its custom Logistic services

**Bobs Boats;** Maritime tenant providing storage, mechanic and custom fabrication of all types of boats

**Seattle Forge;** Maritime tenant specializing in Forging of anchors and commercial crabbing equipment

**AdamsGarage LLC;** Specialty European car dealer and mechanics shop

**Daniel Trenery;** Maritime Tenant, storage of hydroplanes and motor vehicles

**Landstrom, Inc;** Heavy and custom trucking related mechanic

**Moorage;** (2) Private boats

### **Impacts of (DUW – 1a) on the Property;**

This Route would have devastating impacts to the Property. Besides the obvious piers travelling thru the north building and rendering them useless, the TCE would landlock the entire southern portion of the property. Given the Port of Seattle's intention to close the mid access point of the Property, and the Southern access easement being limited access, the tenants will no longer be able to access their buildings during that TCE period. Most impacted will be UMF which specializing in long and heavy loads. This will seize their operation during the TCE period, but they will never be able to operate their specialty business after the piers have been completed. UMF will no longer be able to circulate around the yard with its long trailers and will not have the areas desperately needed for loading and unloading of their special equipment. All the other Maritime tenants will be put out of business during the TCE period and will likely not return.

If route DUW – 1a is chosen, we would suggest that Sound Transit embrace a full property acquisition, rather than a partial taking that would completely destroy the value of the property remaining.

### **Impacts of (DUW – 1b) on the Property;**

This too would be devastating to the Property. Several piers would come thru the south buildings which would put Bobs Boats, Landstom trucking, AdamsGarage and Dean Trenery out of business. This literally would go directly thru their buildings. The most impactful would be during the Temporary Construction Easement (TCE) period where United Motor Freight would be impaired by losing its customs warehouse and central office. It also appears that circulation around the buildings would be restricted and prevent operation of United Motor freights business, this would likely permanently hinder their operations.

If route DUW-1b is chosen, we again would suggest that Sound Transit embrace a full property acquisition, rather than a partial taking that would completely destroy the value of the property.

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504329 - Riverside Mill LLC Draft EIS Comment**

#	Comments	Responses
1	<p>Impacts of (DUW – 1a) on the Property; This Route would have devastating impacts to the Property. Besides the obvious piers travelling thru the north building and rendering them useless, the TCE would landlock the entire southern portion of the property. Given the Port of Seattle’s intention to close the mid access point of the Property, and the Southern access easement being limited access, the tenants will no longer be able to access their buildings during that TCE period. Most impacted will be UMF which specializing in long and heavy loads. This will seize their operation during the TCE period, but they will never be able to operate their specialty business after the piers have been completed. UMF will no longer be able to circulate around the yard with its long trailers and will not have the areas desperately needed for loading and unloading of their special equipment. All the other Maritime tenants will be put out of business during the TCE period and will likely not return. If route DUW – 1a is chosen, we would suggest that Sound Transit embrace a full property acquisition, rather than a partial taking that would completely destroy the value of the property remaining.</p>	<p>The West Seattle Link Extension Final EIS assumes that all businesses on this property would be relocated under Preferred Alternative DUW-1a. Please see Section 4.1, Acquisitions, Displacements, and Relocations, of the Final EIS for more information on the property acquisition and business relocation process.</p>
2	<p>Impacts of (DUW – 1b) on the Property; This too would be devastating to the Property. Several piers would come thru the south buildings which would put Bobs Boats, Landstom trucking, AdamsGarage and Dean Trenery out of business. This literally would go directly thru their buildings. The most impactful would be during the Temporary Construction Easement (TCE) period where United Motor Freight would be impaired by losing its customs warehouse and central office. It also appears that circulation around the buildings would be restricted and prevent operation of United Motor freights business, this would likely permanently hinder their operations. If route DUW-1b is chosen, we again would suggest that Sound Transit embrace a full property acquisition, rather than a partial taking that would completely destroy the value of the property.</p>	<p>The Final EIS assumes that all businesses on this property would be relocated under Alternative DUW-1b. Please see Section 4.1, Acquisitions, Displacements, and Relocations, of the Final EIS for more information on the property acquisition and business relocation process.</p>

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April 28, 2022

**VIA EMAIL**

WSBLEDEIScomments@soundtransit.org

Lauren Swift  
Sound Transit  
401 S. Jackson St.  
Seattle, WA 98104-2826

Bruce Harrell  
Mayor of the City of Seattle  
600 Fourth Ave, 7<sup>th</sup> Floor  
Seattle, WA 98104

Dear Ms. Swift and Mayor Harrell:

We write this letter to articulate the SODO Business Improvement Area's preferred station alternative 1b, share our technical concerns and requests for additional information and analysis in the DEIS, as well as to layout the desired framework for insuring SODO's needs are met during the ten-year construction period and beyond. In our opinion, SODO has been treated as an afterthought, a neighborhood to be damaged for the greater ST3 good, and not a focus of concern. We hope this will change, and that Sound Transit and the City of Seattle will collaborate with us to bring about a state-of-the-art transfer station and high-performing multi-modal transportation network that serves SODO.

**Background:**

The SODO Business Improvement Area (BIA) is a robust and diverse 950-acre (41,382,000 SF) business district centered around a strong industrial base critical to Seattle's people and its economy. Created under the auspices of the City of Seattle in 2014, the SODO BIA mission is to Advocate for a Safe, Clean, Connected and Engaged SODO. The SODO BIA strives to achieve this mission through a variety of activities implemented to support and be a voice for the SODO community consisting of more than 1,200 businesses that employ over 50,000 people.

The SODO BIA works tirelessly to make SODO a community where business can thrive, and we know that transportation plays such an important role in this complex environment. We support many successful transportation projects including the completion of the Lander Street Overpass

and funding for the East Marginal Way South Corridor Improvement Project. We understand the complex nature of our roads and the intersection of freight, vehicles, bicycles and pedestrians and advocate for safe corridors for all users. While SODO is a business and economic hub, we are home to a few hundred residents, 75% of which do not use public transportation.

Like the residents of SODO, a large majority of the workers in SODO do not rely on public transportation. Rather, the transportation infrastructure in SODO serves to pass people through SODO to the downtown core and stadiums. When passing through SODO, downtown workers and stadium attendees depend in large part upon the SODO Trail (for bikes and pedestrians) and the E3 busway (60 buses an hour) to get to their destinations. Yet Sound Transit, King County Metro, and the City of Seattle still have no plan for how to relocate these significant transportation services for 10 years and beyond- safely and efficiently and without bringing SODO's industrial base and freight to a grinding halt.

With SODO's little to no reliance on public transportation, it is no surprise that the SODO Sound Transit Lander Street Station is an underperformer with only an average of 28 boardings a day pre-pandemic. However, it is not just the lack of public transit usefulness that detracts riders in SODO from Link rail. It cannot be stated enough that the primary concern among SODO property owners, businesses, and workers is public safety, and the current SODO station has failed to provide a location for riders to feel safe. With its remote location away from the street, poor lighting, delayed maintenance, difficult drop-off or pick-up, no restrooms, no ambassadors, and very few eyes on the street, the current SODO station's design causes it to underperform. Sound Transit 3 promises more of the same and worse if the station alternative 1b is not selected.

The Sound Transit 3 (ST3) plan is only focused on moving people through SODO. There are no planned transportation improvements for SODO itself. Instead, ST3 plans to permanently take and sacrifice sections of Seattle's precious industrial lands, for commuters wanting to pass through. Threatening essential legacy Seattle businesses and workers at Pacific Iron and Metal and Franz's Bakery, just to name two. ST3 also seemingly plans to destroy the SODO Track indefinitely, a local and national treasure known for its outstanding cityscapes and award-winning public art. ST3 should include a focus on climate impacts, equity for isolated communities in Georgetown, and the need to finally fix the missing link from Georgetown to SODO, and plan to safely relocate vulnerable roadway users.

Equally troubling about the plans to permanently damage SODO was the damage done to SODO by cutting it in half with the Link rail development itself. This became obvious when the DEIS was released and ST3 did not grant SODO 'Community Advisory Group' status. Instead, SODO was cut in two, and the SODO BIA was forced to attend both the West Seattle/Duwamish Community Advisory Group and the Chinatown International District/SODO Community Advisory Group. This made it immensely difficult for property owners and businesses to understand the true impact the construction and final infrastructure will have on SODO, and it negatively impacted SODO's ability to equitably participate in the ST3 planning process. Advocacy efforts were split and had to fight for time with the other neighborhoods.



With no material ST3 Link rail ridership to come from SODO businesses, workers, or residents, ST3 offers little to nothing in benefits for SODO. Rather, SODO businesses and workers will be temporarily and permanently displaced, and those still here will be suffering under ten years of construction disruption and traffic-jammed streets. Then, because the new SODO station will be a transfer station where riders must wait for trains, more crime can be expected at the station. These issues must be vigorously mitigated.

### **Specific Comments and Requests:**

The SODO BIA's first objection is to the permanent displacement of any business out of the SODO district. Many of our companies have been here for decades and depend on their proximity to the Port of Seattle, downtown, and the I-5/I-90 interchange and cannot relocate easily. Taking these businesses means losing industrial land and demolishing and closing family businesses that have built the City and region and provide for its food security. As such, the final plan should prioritize ensuring that SODO historic small **businesses** and companies like Pacific Iron and Metal and Franz's Bakery **remain in SODO**.

With regards to the alternatives in the DEIS, it was not possible for the SODO BIA to agree on which one was "best" because each alternative presents dire negative consequences for SODO and Seattle. Rather, our task was to focus on which alternative was the least worst or least objectionable. Collectively, **the SODO BIA's preferred station alternative is 1b**. This alternative would take the underutilized Post Office Garage at the corner of 4<sup>th</sup> & Lander St. This garage is often cited as a public safety concern for pedestrians who must walk by it when accessing the current SODO station and is a barrier to community cohesion in SODO. Station 1b also moves the station and access to Lander St which is the main east-west connector for pedestrians accessing employment centers on 1<sup>st</sup> Ave S. This alternative appears to cause the least impacts to SODO legacy businesses and will create the best commuting option for those who do use the SODO station.

**This new transfer station**, bringing airporters, Downtown, and West Seattle together **should be a premier station with amenities** like drop-off and pick-up areas, ambassadors, restrooms, circulator buses, sidewalks, and safe pedestrian routes to major destinations and beyond. As such, with actual detailed planning in its infancy, and too many critical details still unknown and likely undecided, it remains imperative that the SODO BIA receive more technical assistance during ST3's planning and construction. **Sound Transit should organize a multi-disciplinary team** uniquely qualified to support SODO businesses and workers, solve traffic problems, provide relocation assistance, and create a premier station.

One of the best ways Sound Transit and the City of Seattle can help the SODO BIA is by entering into a **Memorandum of Agreement** that will protect in place SODO's businesses, workers, residents, and commuters, and provide a high-performing multi-modal transportation network. **This should include a SODO/Duwamish Community Advisory Group; Neighborhood Traffic Mitigation Committee, Construction Hub Coordinator, Land Use planning, regular in-person/on-site information and meetings with SODO BIA leadership, and a Mitigation Fund.**

Most importantly, achieving the above-stated goals will only be possible with a significant **SODO Mitigation Fund**. Where ST3 condemnation payments and mitigation end, the City of Seattle should provide a **SODO Mitigation Fund for businesses and workers impacted during construction, including displaced/relocated businesses and workers; complete replacement in-kind of the SODO Trail during and after construction; complete the missing Georgetown to SODO bike/pedestrian link; install a permanent stoplight at Forest and 4<sup>th</sup> Ave; create safe pedestrian routes to the Link rail (circulator buses, lighting, sidewalks, ambassadors, police response performance goals); and support other economic development activities.**

Thank you for your attention to this very important matter. We look forward to working with you collectively to protect, preserve, and enhance SODO's unique and critical business community.

Best regards,

SODO Business Improvement Area

A handwritten signature in black ink, appearing to read 'Erin Goodman', written over a horizontal line.

By:

\_\_\_\_\_  
Erin Goodman  
Executive Director

## **Attachment A: TECHNICAL MEMORANDUM**

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The purpose of this technical memorandum is to provide preliminary comments on the transportation and traffic analysis in the Sound Transit West Seattle to Ballard Link Extension (WSBLE) Draft Environmental Impact Statement (DEIS). The comments will focus on the SODO segment.

### **General**

In general, the DEIS lacks disclosure of relevant data. This lack of information and data limits the ability of the reader and impacted stakeholders to adequately comment on the project, the impacts, and mitigation. A lack of information and data is inequitable to stakeholders and community groups with fewer resources. A few key examples are described below followed by comments on DEIS chapters.

For example, figures showing cross-sections of reconstructed roadways do not show lane widths or LRT alignment widths. While only at the 10% or less design level, the figures should disclose the lane widths used in the design. If a range of widths is still under consideration this should be disclosed. Lane widths are very important features of the roadway for freight mobility and safety and a very important feature for pedestrians. The LRT alignment widths would provide context for evaluating alternative alignments. The reader is unable to respond to the impacts of the reconstructed roadway segment without this information.

**Request:** Disclose the lane widths, track widths, and LRT footprint widths used in the DEIS design on figures that are shown in the body of the DEIS.

For example, the analysis of transit ridership is missing information on who the riders are at the SODO station and in the SODO area. The one indicator of riders is that the DEIS states that the majority of riders at the SODO station are transfers. The questions that are generated are then, who benefits from this station and who is impacted? This question should be answered in the equity section. Of concern is that the SODO station is being designed for riders passing through SODO with the impacts affecting the SODO community. Transit riders that are the typical downtown commuter now have permanently revised commute patterns post-Covid and will be commuting fewer days per week as work-from-home has become normal. It is most important to recognize that these commuters most often have a choice as to whether or not to commute. Industrial workers, workers associated with commercial activities in the SODO area, and essential workers do not have that choice. Their work hours are also outside the traditional 9am to 5pm of normal business hours. Their origins and destinations may not be in the same neighborhoods

as higher-income riders. Of note, although difficult to quantify, the SODO station does not realize full ridership potential due to a reduction in people's willingness to ride transit due to the real and perceived personal safety issues.

**Request:** Include an analysis of transit riders by type in the equity analysis and disclose who benefits, and who bears the impact.

For example, in Chapter 1 Purpose and Need the "South King County High-Capacity Transit Corridor" (2014d) is cited, and a statement is made that the study forecasts that "...light rail transit ridership would be higher than bus rapid transit ridership" for the West Seattle to downtown extension." There is no citation as to how many additional riders would use light rail versus bus rapid transit. This lack of data in the DEIS limits the ability of the reader and stakeholders to evaluate the level of impact versus benefit. A small marginal difference in ridership would be a very different scenario than a large difference in ridership. In addition, transit forecasts would have substantially changed with permanent changes in transit ridership following the Covid pandemic. The Sound Transit system has substantially changed since the preparation of the 2014 study with BRT connecting Renton to Tukwila and Burien. A reduction in light rail ridership could warrant revisiting the light rail versus bus decision and a shift back to bus rapid transit would be a significant cost savings. The cost savings could also provide the opportunity to advance social equity by providing a higher level of transit service to the Georgetown and South Park neighborhoods.

**Request:** Present the data used in the statement that light rail transit ridership would be higher than bus rapid transit for the Downtown to West Seattle Link Extension based on the current ST3 conditions. Review and revise forecasts based on trip-making changes post Covid. See comments on Appendix N.1.A Methodology below. Include "advance social equity" in the consideration of South King County HCT extensions.

For example, the "Third-party Funding" option of the SODO station alternatives is not explained in the chapters following Chapter 2 Alternatives Considered. It is unclear to the reader if the third-party element of the alternative is included in the project analysis. It is unclear what the project alternative is, and what the impacts and mitigation are if the third-party element is not funded. The source of third-party funding is not disclosed making it impossible to assess the risk of achieving third-party funding.

**Request:** In Table 2-1. Summary of West Seattle Link Extension Alternatives and Design Options Evaluated in the Draft Environmental Impact Statement, add the third-party funding option and clarify if the third-party funding option is included in the preferred alternative analysis within the

subsequent DEIS chapters. Repeat the third-party funding assumptions and if the third-party option is included in the preferred alternative in each chapter of the DEIS and appendices. If third-party funding options are not part of the preferred alternative analysis, remove the third-party funding from all figures presenting analysis. Disclose the source of third-party funding and if there are any third-party funding commitments at the time of the document publication.

## **Chapter 1. Purpose and Need**

### **1.2.1 Purpose of the WSBLE Project**

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

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

### **1.2.1 Need for the WSBLE Project**

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

The following need statement is made in this section. “Most roadways in the project corridor cannot be expanded to accommodate increasing demand without substantial property acquisitions because of limited right-of-way.” It is inaccurate and disingenuous to make this statement about roadways when there is limited right-of-way for constructing the link rail alignment resulting in substantial property acquisitions for the link rail alignment, stations, and construction.

***Request:*** Delete this need statement.

Footnote 1 states that: “Puget Sound Regional Council acknowledges that the current pandemic may have effects on the economy that could alter long-range forecasts. Puget Sound Regional Council’s next regional forecast is anticipated no earlier than 2023. For the purposes of this Draft Environmental Impact Statement, the Puget Sound Regional Council’s current forecasts are

applied to the analysis.” At this point in the pandemic, there are permanent changes to commuting patterns that should be acknowledged and accounted for. Office workers will no longer commute to downtown Seattle five days per week. This is evidenced by current shifts to cubical “hoteling” by the private sector and government offices including Sound Transit and King County Metro. Such a shift in commute patterns significantly alters the travel demand forecasts. In addition, office workers will always have a choice as to whether a commute trip is made. Essential workers, industrial works, and other types of workers have different work schedules, home-to-work origins and destinations, and must travel to work.

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

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

**Request:** Revisit the project definition, consider scaling back, and provide additional funding to the SODO station to ensure the SODO station is developed to best serve the SODO community.

## **Chapter 2. Alternatives Considered**

### **6.2.1 No Build Alternative**

The statement “Under the No Build Alternative, the WSBLE Project would not be built and there would be no new high-capacity transit in the project corridor.” is inaccurate. ST3 identifies a high-capacity transit (HCT) improvement for the West Seattle to Downtown corridor and does not specify the HCT mode. The 2014 alternatives analysis determined the mode as light rail and not a bus mode. The purpose and need for the WSBLE subsequently identified that the purpose is to build light rail. If light rail is not constructed bus HCT modes remain an option for the West Seattle to Downtown HCT corridor and new HCT could be built in the corridor. To state that “there would be no new high-capacity transit in the project corridor” is inaccurate. The proposed project could be revised and another HCT mode proposed.

**Request:** Revise the sentence to read, “Under the No Build Alternative, the proposed WSBLE Project in this DEIS would not be built. Alternative HCT modes would be re-evaluated, and a new build alternative would be proposed. The remainder of the paragraph and the second paragraph should be revised appropriately.

### **Chapter 3. Transportation Environment and Consequences**

#### **3.4.3 Environmental Impacts of the Build Alternatives**

The SODO busway provides a convenient transfer between rail and bus. Transit riders will be impacted by the increase in transfer time to walk to bus routes on 4th Avenue South and 6th Avenue South.

**Request:** Prepare analysis to riders and travel time for the closure of the SODO busway, both in the permanent condition and during construction. Provide information on the transit riders affected.

The footnote in this sentence is not actually explained. The explanation is a generic description of what a formula fund is, but there is no explanation as to how formula funding affects transit providers.

**Request:** Provide an explanation of the formula funding and its effects on the SODO busway.

The number of transit riders passing through the SODO station, the transfers, and the boarding and alighting at the SODO station is important information for the reader to evaluate the impacts and benefits of the alternatives. This information is incomplete.

**Request:** Expend Table 3-6. 2042 P.M. Peak Hour Station Trip Generation by Mode (Boardings and Alightings) – West Seattle Link Extension, to include riders passing through the station, transfers to light rail, transfers to bus, and boarding and alighting with destinations in SODO.

Transit vehicle travel time is evaluated, but not travel time for transit riders. Impacts on transit riders boarding and alighting at the SODO station or transferring to bus are not disclosed.

**Request:** Evaluate travel time for riders at the SODO station with destinations in SODO and riders transferring to bus transit.

Alternatives that close the Busway and shift buses to 4th Avenue South and 6th Avenue South are lacking in the evaluation of the quantity of buses and their operations during the am peak period, pm peak period, and the SODO mid-day peak. There are impacts associated with shifting 40 to 60 buses to arterial streets that have not been addressed. For example, during daytime hours the garbage trucks traveling to and from the recycling center can back up to one-half mile in both directions. Articulated buses have been observed blocking South Lander Street.

**Request:** Prepare bus transit operational analysis for buses shifting from the busway to arterial streets. Prepare analysis of street and intersection operations with buses shifting to arterial streets. Prepare infrastructure mitigation to manage bus operations, the increase in pedestrian travel to/from buses and the SODO station, conflicts with existing truck activity, and signal operations.

There are numerous rail facilities and rail owners in the SODO segment. A visual inventory of rail facilities is needed to understand the impacts to rail facilities, and the impacts of the alternatives in the context of rail facilities. The random text regarding impacts to rail facilities is difficult to follow and difficult to understand.

**Request:** Provide a figure showing the existing inventory of rail facilities including spurs and grade separations. Label each of the rail facilities, and destinations such as King Street Center, and indicate in the text the daily operations for those facilities. Show the future No Build in a figure and text and describe future plans and programs for each of the rail facilities. Disclose a past request by Amtrak to vacate South Holgate Street, which may again become an active request. In Chapter 5 it would be good to add the term with regard to the Amtrak proposal that it is a “reasonable foreseeable future action”.

### **3.5.3.3.2 SODO Segment**

The second sentence below may or may not be accurate: “Preferred Alternative SODO-1a and Option SODO-1b would permanently close the SODO Busway, with 30 to 50 total buses in the peak hour using parallel streets such as 4th Avenue South and 6th Avenue South. However, intersection L.O.S. results would not change compared to the No Build Alternative.”

**Request:** Confirm that the bus volumes, bus equivalent vehicle units, and bus dwell time are included in the L.O.S. analysis. Confirm the intersections analyzed for L.O.S. are adequate to disclose the impacts of shifting bus volumes to 4th Avenue South and 6th Avenue South. Disclose if there are transit signal priority treatments at intersections on 4th Avenue South and 6th Avenue South with the alternative or as mitigation. Review the document for consistency in



shifted bus volumes (see Safety section). In the paragraph quoted above, site the data that confirms that intersection L.O.S. results would not change.

### **3.8 Safety**

In section 3.8.3.2 SODO Segment, the text is missing safety impacts of alternatives that close the SODO nonmotorized trail that would shift bicycles and pedestrians to 1st Avenue South and 4th Avenue South. Serious injuries and fatalities could be expected to increase when bicycles are shifted from a protected separate pathway to an arterial street. In addition, the SODO nonmotorized trail is planned to connect to pathways in the Georgetown and South Park neighborhoods that would use the trail to access the SODO station. There are safety impacts of shifting bicycles to 1st Avenue South and 4th Avenue South on traffic flow and the rider walk route between the station. Additional buses on arterial streets will increase modal conflicts, modal conflicts result in an increase in crashes between modes.

**Request:** Prepare a safety analysis of closing the SODO Non-motorized trail and of closing the E3 busway. Quantify and show the increase in modal conflicts for all modes. Quantify and show the effects of closing the SODO nonmotorized trail on the pedestrian and bicycle network to and from important origins and destinations such as employment on 1st Avenue South and the Georgetown and South Park neighborhoods and the resulting travel on 1st Avenue South, 4th Avenue South, and 6th Avenue South. Use the “Safety Systems Approach” to evaluate the increase in risk of bicycle travel on similar arterials compared to a protected facility.

Quantify and show the increase in modal conflicts for shifting buses to arterial streets along the length of the routes used due to the closure of the Busway. Show midday conflicts with freight traffic. Show the changes to the rider walk routes to bus stops and the increase in modal conflict. Disclose that an increase in modal conflict results in an increase in crashes between modes.

There is a statement, “With Alternative SODO-2, the elevated guideway for the West Seattle Link Extension would be grade-separated from the roadway. No portion of the guideway would be within the roadway, and it would not impact vehicle safety.”

**Request:** Show the location of the light rail guideway piers and confirm if the locations of bridge piers would have local impacts on all modes and traffic during construction.

Section 3.8.4 Mitigation for Operation Impacts states, “no further mitigation specific to safety-related impacts is proposed”. Closing the SODO nonmotorized trail will result in an increase in serious injuries and fatalities as bicyclists and pedestrians shift from a protected pathway to

arterial streets. The Georgetown and South Park neighborhoods will no longer have a grade-separated bicycle facility to their nearest Link station, the SODO station. Current social equity policy should guide Sound Transit to maintain the same level of protection for bicyclists traveling to and from Georgetown and South Park that is currently provided by the SODO trail with mitigation for the loss of the trail, for alternatives that close the trail, and during construction.

**Request:** Develop mitigation for the alternatives that close the SODO nonmotorized trail in the form of equivalent built infrastructure.

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

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

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

**Request:** Source the Vision Zero plan.

### **3.11 West Seattle Link Extension Construction Impacts**

The length of construction, up to 10 years, is effectively a permanent condition for stakeholders and their resulting impacts. For long-term construction impacts, it is appropriate to analyze the elements of the environment during construction.

**Request:** Prepare an analysis and disclose impacts during construction for each of the elements of the environment. Prepare a detailed and quantified analysis as if a permanent condition. Include street operations, changes in circulation and the resulting L.O.S., changes in bus operations on the streets, impacts to transit riders, pedestrians, and bicyclists. Eliminate the word “temporary” when referring to construction impacts. Use time-related adjectives such as “a two-week closure” or a “three-month closure”. Show construction phasing and durations.

The following section and text: “3.11.2.5 Safety However, the SODO Trail would be temporarily closed (see Section 3.11.2.4), requiring pedestrians and bicyclists to likely detour to 4th Avenue South or 6th Avenue South instead of to a multi-use facility, which would increase the potential for conflicts with vehicles.” This is an inadequate analysis and conclusion.

**Request:** Prepare a quantified analysis of the increase in modal conflicts during construction. Disclose that an increase in conflicts results in an increase in crashes. Compare crash rates and severity on similar arterials over a ten-year period. Prepare infrastructure solutions to mitigate the safety impacts.

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

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

### **3.19.2.5 Safety**

The sentence that reads, “...as collisions are correlated with traffic volumes” is incorrect. This statement ignores operations and geometric factors in safety. The conclusion, “...would be a negligible overall safety impact” cannot be made based on the incorrect qualitative assessment relative to traffic volumes.

**Request:** Prepare a safety assessment of facilities used by diverted traffic considering operational and geometric factors. Define “negligible” in the context of Seattle’s Target Zero plan.

13.19.7.2 Does not speak to coordination with stakeholders in the preparation of a Construction Access and Traffic Management Plan.

**Request:** Include mitigation measures that commit to coordination and communication with stakeholders.

## **Chapter 4. Affected Environment and Environmental Consequences**

### **4.2.1 Acquisitions, Displacements, and Relocations**

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

**Request:** Revise the title of Appendix L as follows: “Acquisitions, Displacements, and Relocations”. Revise the following reference as follows: Appendix L4.1,—Acquisitions, Displacements, and Relocations, lists potentially affected parcels in tables and shows the parcels in maps.

The DEIS does not explain how the following City of Seattle policy has been impacted. The City has identified the industrial nature of SODO in the manufacturing/industrial center designation and has plans and policies in place to protect existing industrial land uses given their crucial role in the city and regional economies. Chapter 4 indicates that 16-17 businesses would be displaced. There is no discussion of the types of business and the importance to the Duwamish MIC.

**Request:** Provide information as to the types of business, their industrial, manufacturing, and commercial activity, size in acreage and employees, the importance of their location in the Duwamish MIC, and role in the economy.

The text referred to above goes on to say, “As a result, potential future land uses are similar to existing land uses in this segment.” This statement is not accurate and would indicate there is no impact to the Duwamish MIC land uses.

**Request:** Disclose the reduction in useable land in absolute numbers including acreage and employees as a land-use impact. Percentages are not a transparent disclosure.

The sentence, “For all SODO Segment alternatives, spur tracks along the SODO Busway north of South Forest Street would be removed, which would affect rail access to businesses.” is followed by text that discusses the United States Post Office. It is unclear where to find text that identifies the tracks removed and the effect to businesses.

**Request:** Provide information on the tracks removed and businesses affected. See the request above for a comprehensive presentation of rail facilities.

This sentence is not accurate: “There would be no impacts to neighborhood cohesion.”

**Request:** Define “neighborhood” and acknowledge that the SODO area is a neighborhood of industrial and commercial activity. Define “cohesion” and identify the cohesion that would be impacted or not by the alternatives.

## **Chapter 5 Cumulative Impacts**

Chapter 5 Cumulative Impacts and Appendix K, Present and Future Developments, Transportation, and Public Works Projects in the Study Area, are missing the *Seattle Industrial & Maritime Strategy Council recommendations and the DEIS*. The lack of information from the *Seattle Industrial & Maritime Strategy Council recommendations and the DEIS* land use impacts and the effect within the context of the SODO station alternatives is confusing.

**Request:** Provide *The Seattle Industrial & Maritime Strategy Council recommendations and the DEIS* should be presented in Chapter 5.

## **Chapter 6. Alternatives Evaluation**

### **6.2.2 Build Alternatives**

#### **6.2.2.1.1 SODO Segment**

The framework for the SODO station alternatives analysis is based on feedback from the United States Postal Service (USPS), that removal of approximately 14 surface parking spaces, “.....which the United States Postal Service has indicated would require relocating the facility.” This statement should be sourced in a footnote or endnote to indicate with whom this conversation occurred and the date. In briefings by Sound Transit for the SODO BIA, Sound Transit was not able to answer which agency (Sound Transit or USPS) has priority in property issues. The legal framework should be clearly identified before a decision on such a major infrastructure investment. Stakeholders including property owners are unable to prepare a substantive response to the station alternatives without this information. In addition, the DEIS does not include a quantified parking analysis of the USPS existing parking spaces, the utilization, and if necessary, mitigation for those 14 parking spaces.

**Request:** Prepare a summary of the legal framework for property acquisition of the USPS and share with stakeholders. Add a footnote or endnote for the conversation that occurred where the USPS indicated the taking of 14 property spaces would require relocating the facility. Prepare a utilization study of the USPS parking spaces and develop mitigation. The USPS is a public facility.

Table 6-1. Projected Ridership and Key Impact Differences – SODO Segment.

This table is missing a column for the No-Build alternative, which is necessary for decision-making and consistency with other Sound Transit DEISs. The Resource Impact Measure only includes Public Service Impact and that measure only includes the USPS. As stated above, the framework for decision-making with regard to the USPS has not been established.

**Request:** Redefine the measure as “USPS impacts”, as no other resources are evaluated. Provide the legal framework for property impacts, taking, and mitigation of the USPS and Sound Transit. Add footnote that sources the conversation indicating that the loss of 14 spaces would require relocating the facility.

Table 6-1 is missing key impacts to riders for whom the station is being constructed.

**Request:** Summarize rider impacts including rider travel times between the station and a consistent location on the surface street network, rider personal safety, transfers, and changes in the 10-minute walkshed for riders with each station design. A 15-minute walkshed is recommended for station-area planning of a light-rail facility.

#### **Attachment N.1A Transportation Technical Analysis Methodology Report**

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

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

The early decision (2014) to provide light rail versus bus to West Seattle should be revisited considering the reduction in traditional office-worker commute patterns to downtown Seattle. The DEIS simply states that there would be more riders on light rail to West Seattle than on bus rapid transit but does not disclose the magnitude, based on the 2014d study.

**Request:** Develop a methodology to use the revised forecast to disclose the magnitude of the difference in ridership between light rail to West Seattle and Bus Rapid Transit. Confirm if the 2014 decision is still valid in 2042.

Travel time analysis for riders to/from stations including transfers and walk times is missing from the methodology. Include the added travel time for riders that were on the busway and then shifted to buses 4th Avenue South and 6th Avenue South.

**Request:** Add travel time analysis methodology for riders.

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

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

The following sentence is insufficient: "There could be some traffic circulation and property access changes after construction related to properties that have been fully or partially acquired during construction."

**Request:** Identify fully or partially acquired properties that would have changes in access and/or traffic circulation.

#### **4.4. Parking**

The United States Postal Service (USPS) is a public agency with a parking facility with exclusive parking. There is the loss of 14 surface parking stalls that drives the need for the preferred alternative, with significant impacts on adjacent properties. Given the quantity of garage parking, and that the USPS is a public agency, this facility warrants a parking utilization study to provide information and data to develop mitigation for the loss of 14 stalls versus the relocation of businesses.

**Request:** Revise the methodology to provide for parking utilization study of public facilities with off-street parking.

### **Appendix N.1 Transportation Technical Report**

Note: Comments made on Chapter 3 of the DEIS chapters above, are also applicable to Appendix N.1 Transportation Technical Report. The comments on the transportation technical report (TTR) below do not reflect a comprehensive review of the TTR because many comments that could be made on the TTR are captured in the chapters of the DEIS.

### **3 Transit**

The text and tables do not show where the congestion occurs that results in increased travel time for existing transit.

**Request:** Describe and quantify the major sources of congestion, the location, and the cause of congestion.

The text and tables do not show where the location and cause of reduced transit reliability.

**Request:** Describe and quantify the major sources of reduced reliability, the location, and the cause of the LOS E and F reliability measure.

The existing passenger loads show that there is existing transit capacity through SODO and the West Seattle corridor. Depending on where the existing travel time and reliability issues occur and solutions to those issues, there may be the ability to reduce transit travel time for buses. Considering the permanent changes to transit ridership post-Covid, the strategy to reduce bus delays could be revisited. The additional bus travel time on 4th Avenue South and 6th Avenue South should be considered in the analysis.

**Request:** Provide information and data on existing sources of bus delays and future sources of bus delays.

### **6 Non-motorized Facilities**

Figure 6-1: Existing Pedestrian Facilities West Seattle and Ballard Link Extensions - SODO Segment. This figure does not show existing pedestrian facilities.

**Request:** Inventory and show existing pedestrian facilities, including sidewalks, within the 10-minute walkshed of the SODO station.



The walkshed for each alternative does not provide a useful comparison of alternatives for the rider and pedestrian. The 10-minute walkshed, while a nominal industry standard for walk distance to a bus stop is longer for light rail. Major employment destinations for SODO station users are on 1st Avenue South and are outside the 10-minute walkshed. The walk segment of a transit rider's trip is a critical component of the rider's transit trip. The walk segment varies for the existing condition, Build, and No Build Alternative. An analysis of the walk segment would provide a comparison of each condition and the whether the goals defined during station concept development were achieved.

**Request:** Provide an analysis in graphic form and tables showing the rider's walk route to/from the station for the a.m. and p.m. peak hour within the walkshed for the existing condition, future No Build and Build Alternatives. Show the travel time for walk routes for the No-Build and Build alternatives, including use of escalators and elevators, to/from the station platform to pedestrian facilities, and on pedestrian facilities including changes in grade and wait time at signalized intersections. Major employment destinations for SODO transit riders are on 1st Avenue South and are outside the 10-minute walkshed. These employment destinations include the Starbucks complex with Amazon, the John Stanford Center for Education Excellence, and the Home Plate Center. Include these major employers in the walk route analysis. Describe the walk environment in terms of the pedestrian environment and personal safety from the rider's perspective.

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

**Request:** Revise the non-motorized methodology to eliminate walksheds. A walkshed analysis is not an analysis of nonmotorized impacts and mitigation. Provide a description of a methodology to evaluate walk routes and impacts on the walk routes by alternative for the SODO station.

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

**Request:** Show in a figure the inventory of non-motorized facilities, including the quality of the walk route within one-half mile of the station for the existing condition, No-Build and Build conditions. Include a comparison of changes in grade for the pedestrian route in the analysis of pedestrian circulation.

The following sentence is not understood. "A high volume of pedestrians is expected on 5th Avenue South and the SODO Busway north of South Lander Street; however, this is the location of the station platform, which would have an effective width large enough to accommodate the forecasted pedestrian volumes." It is unclear what is a high volume of pedestrians and why they are on 5th Avenue South and the add-on, "however this is the location of the platform".

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

#### **4.2.3.2 Construction Mitigation**

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

**Request:** Prepare, describe, and show in figures the impacts of construction to the street system, to the busway, to the SODO trail, to buses, and the displacement or access and circulation impacts to business in SODO. Prepare construction mitigation measures to mitigate the impacts.

Construction activity of up to ten years is essentially a permanent condition for SODO BIA. The impacts to streets and mobility for SODO businesses, pedestrian and bicycle facilities, the busway, and impacts to riders have not been addressed. Short-term weekday closures can have a significant impact on industrial businesses and truck mobility.

Closures of more than one week warrant detailed analysis of construction impacts to adequately understand the impacts and develop mitigation measures. See prior comments on the missing impact analysis of the closure of the busway, impacts to riders and their walk routes, impact to riders transferring between light rail and bus, impacts to bicyclists and pedestrians with the closure of the SODO trail.

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

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

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

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

## Attachment B: SUMMARY OF SODO BIA REQUESTS

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### Overall Project Requests:

- Sound Transit to organize a multi-disciplinary team uniquely qualified to support SODO businesses and workers, solve traffic problems, provide relocation assistance, and create a premier station.
- Enter into a Memorandum of Agreement that will protect in place SODO's businesses, workers, residents, and commuters, and provide a high-performing multi-modal transportation network. This should include a SODO/Duwamish Community Advisory Group; Neighborhood Traffic Mitigation Committee, Construction Hub Coordinator, Land Use planning, regular in-person/on-site information and meetings with SODO BIA leadership, and a Mitigation Fund.
- Create a SODO Mitigation Fund for businesses and workers impacted during construction, including displaced/relocated businesses and workers.
- Complete replacement in-kind of the SODO Trail during and after construction
- Complete the missing Georgetown to SODO bike/pedestrian link
- Install a permanent stoplight at Forest and 4<sup>th</sup> Ave
- Create safe pedestrian routes to the Link rail (circulator buses, lighting, sidewalks, ambassadors, police response performance goals)
- Support other economic development activities.

### DEIS Technical Requests

- **Release additional data necessary to completely analyze the WSBLE DEIS.**
  - Disclose the lane widths, track widths, and LRT footprint widths used in designs
  - Include an analysis of transit riders by type in the equity analysis and disclose who benefits, and who bears the impact.
  - Present the data used in the statement that light rail transit ridership would be higher than bus rapid transit for the Downtown to West Seattle Link Extension based on the current ST3 conditions.
  - Review and revise forecasts based on trip-making changes post Covid.
- **Clarify information on the third-party funding option and its relation to preferred alternatives.**
  - Share if the third-party funding option is included in the preferred alternative analysis within the subsequent DEIS chapters. Repeat the third-party funding assumptions and if the third-party option is included in the preferred alternative in each chapter of the DEIS and appendices. figures presenting analysis.
- **Add a purpose statement that speaks to protecting existing and planned land uses that are elements of the regional economy and the contribution to the regional economy.**

- Expand upon the unique trip-making patterns of the MICs in the transportation chapter with appropriate analysis of those trips.
  - Provide reference to the types of jobs and well-paying jobs that are unique economy of the MICs from the economic analysis.
- **Use the revised regional forecasts expected in 2023 as the basis for WSBLE infrastructure decisions.**
- **Revisit the project definition, consider scaling back, and provide additional funding to the SODO station to ensure the SODO station is developed to best serve the SODO community.**
- **Provide additional analysis for commenters affected by temporary and permanent closures**
    - Prepare analysis to riders and travel time for the closure of the SODO busway, both in the permanent condition and during construction.
    - Provide information on the transit riders affected.
    - Provide an explanation of the formula funding and its effects to the SODO busway
    - Evaluate travel time for riders at the SODO station with destinations in SODO and riders transferring to bus transit.
- **Provide infrastructure analysis for temporary and permanent closures along with current operations.**
    - Prepare bus transit operational analysis for buses shifting from the busway to arterial streets.
    - Prepare analysis of street and intersection operations with buses shifting to arterial streets.
    - Prepare infrastructure mitigation to manage bus operations, the increase in pedestrian travel to/from buses and the SODO station, conflicts with existing truck activity, and signal operations.
    - Provide a figure showing the existing inventory of rail facilities including spurs and grade separations.
    - Disclose a past request by Amtrak to vacate South Holgate Street, which may again become an active request. For each Build alternative show and describe impacts to the rail facilities.
    - In Chapter 5 it would be good to add the term with regard to the Amtrak proposal that it is a “reasonable foreseeable future action”.

- **Prepare safety analysis of multimodal networks affected by temporary and permanent closures and construction.**
  - o Prepare a safety analysis of closing the SODO Non-motorized trail and of closing the E3 busway.
  - o Quantify and show the increase in modal conflicts for all modes.
  - o Quantify and show the effects of closing the SODO nonmotorized trail on the pedestrian and bicycle network to and from important origins and destinations such as employment on 1st Avenue South and the Georgetown and South Park neighborhoods and the resulting travel on 1st Avenue South, 4th Avenue South, and 6th Avenue South.
  - o Show the location of the light rail guideway piers and confirm if the locations of bridge piers would have local impacts to all modes and traffic during construction.
  - o Develop mitigation for the alternatives that close the SODO nonmotorized trail in the form of equivalent built infrastructure.
  - o Prepare a safety analysis of permanent conditions and conditions during construction for street closures and of traffic shifted to other streets.
  - o Source the Vision Zero plan.
  
- **Prepare an analysis of West Seattle Link Extension Construction Impacts**
  - o Prepare an analysis and disclose impacts during construction for each of the elements of the environment.
  - o Prepare a detailed and quantified analysis as if a permanent condition. Include street operations, changes in circulation and the resulting L.O.S., changes in bus operations on the streets, impacts to transit riders, pedestrians, and bicyclists. Eliminate the word “temporary” when referring to construction impacts. Use time-related adjectives such as “a two-week closure” or a “three-month closure”. Show construction phasing and durations.
  - o Prepare a quantified analysis of the increase in modal conflicts during construction.
  - o Prepare infrastructure solutions to mitigate the safety impacts.
  - o Expand the study area for truck/freight movements to and from major destinations by SODO businesses.
  
- **Prepare a safety assessment of facilities used by diverted traffic considering operational and geometric factors.**
  - o Include mitigation measures that commit to coordination and communication with stakeholders.
  
- **Disclose additional information for potentially affected parcels**

- Provide information as to the types of business, their industrial, manufacturing, and commercial activity, size in acreage and employees, the importance of their location in the Duwamish MIC, and their role in the economy.
  - Disclose the reduction in useable land in absolute numbers including acreage and employees as a land-use impact.
  - Provide information on the tracks removed and businesses affected.
  - Define “neighborhood” and acknowledge that the SODO area is a neighborhood of industrial and commercial activity.
  - Define “cohesion” and identify the cohesion that would be impacted or not by the alternatives.
- **Provide The Seattle Industrial & Maritime Strategy Council recommendations and the DEIS should be presented in Chapter 5.**
- **Prepare a summary of the legal framework for property acquisition of the USPS and share with stakeholders.**
    - Add a footnote or endnote for the conversation that occurred where the USPS indicated the taking of 14 property spaces would require relocating the facility.
    - Prepare a utilization study of the USPS parking spaces and develop mitigation.
    - Redefine the measure as “USPS impacts”, as no other resources are evaluated. Provide the legal framework for property impacts, taking, and mitigation of the USPS and Sound Transit
    - Revise the methodology to provide for parking utilization study of public facilities with off-street parking.
- **Summarize rider impacts including rider travel times**
    - Study travel times between the station and a consistent location on the surface street network, rider personal safety, transfers, and changes in the 10-minute walkshed for riders with each station design. A 15-minute walkshed is recommended for station-area planning of a light-rail facility.
- **Revise the methodology and forecasts to disclose the long-term effects of work-from-home employment on the forecasts.**
    - Develop a methodology to use the revised forecast to disclose the magnitude of the difference in ridership between light rail to West Seattle and Bus Rapid Transit. Confirm if the 2014 decision is still valid in 2042.
    - Add travel time analysis methodology for riders.
    - Expand the study area for truck/freight movements to and from major destinations by SODO businesses.

- Identify fully or partially acquired properties that would have changes in access and/or traffic circulation.
- **Provide additional information on the effects of congestion**
  - Describe and quantify the major sources of congestion, the location, and the cause of congestion.
  - Provide information and data on existing sources of bus delay and future sources of bus delay.
- **Provide information on non-motorized facilities**
  - Prepare an inventory and show existing pedestrian facilities, including sidewalks, within the 10-minute walkshed of the SODO station.
  - Provide an analysis in graphic form and tables showing the rider's walk route to/from the station for the a.m. and p.m. peak hour within the walkshed for the existing condition, future No Build and Build Alternatives.
  - Revise the non-motorized methodology to eliminate walksheds
  - Show in a figure the inventory of non-motorized facilities, including the quality of the walk route within one-half mile of the station for the existing condition, No-Build, and Build conditions
  - Present the a.m. and p.m. peak hour pedestrian volumes estimated on the platform, the access/egress facilities, and the pedestrian facilities in the walkshed.
- **Provide additional information for the complexity of the construction activities and their impact**
  - Prepare, describe, and show in figures the impacts of construction to the street system, to the busway, to the SODO trail, to buses, and the displacement or access and circulation impacts to business in SODO.
  - Prepare construction mitigation measures to mitigate the impacts.
  - Prepare an impact analysis covering operations and safety for all modes affected by construction closures.
  - Prepare infrastructure mitigation to address the operational and safety impacts.
  - Include a description and commitment of the communication program as construction mitigation.



## Appendix O. Draft EIS Comment Summary and Response to Comments

Communication ID: 504364 - SODO BIA Draft EIS Comment

#	Comments	Responses
1	When passing through SODO, downtown workers and stadium attendees depend in large part upon the SODO Trail (for bikes and pedestrians) and the E3 busway (60 buses an hour) to get to their destinations. Yet Sound Transit, King County Metro, and the City of Seattle still have no plan for how to relocate these significant transportation services for 10 years and beyond—safely and efficiently and without bringing SODO's industrial base and freight to a grinding halt.	Please see Section 3.4, Transit, and Section 3.11, Construction Impacts, of Chapter 3, Transportation Environment and Consequences, of the West Seattle Link Extension Final EIS for more information on permanent impacts to the SODO Busway and temporary impacts to the SODO Trail, as well as proposed mitigation.
2	With SODO's little to no reliance on public transportation, it is no surprise that the SODO Sound Transit Lander Street Station is an underperformer with only an average of 28 boardings a day pre-pandemic. However, it is not just the lack of public transit usefulness that detracts riders in SODO from Link rail. It cannot be stated enough that the primary concern among SODO property owners, businesses, and workers is public safety, and the current SODO station has failed to provide a location for riders to feel safe. With its remote location away from the street, poor lighting, delayed maintenance, difficult drop-off or pick-up, no restrooms, no ambassadors, and very few eyes on the street, the current SODO station's design causes it to underperform. Sound Transit 3 promises more of the same and worse if the station alternative 1b is not selected. The Sound Transit 3 (ST3) plan is only focused on moving people through SODO. There are no planned transportation improvements for SODO itself.	Please see Section 3.4, Transit, of the Final EIS for more information on projected ridership at the SODO Station. Please see Section 4.14, Public Services, Safety, and Security, for information regarding security around stations and safety considerations.
3	Instead, ST3 plans to permanently take and sacrifice sections of Seattle's precious industrial lands, for commuters wanting to pass through. Threatening essential legacy Seattle businesses and workers at Pacific Iron and Metal and Franz's Bakery, just to name two. ST3 also seemingly plans to destroy the SODO Track indefinitely, a local and national treasure known for its outstanding cityscapes and award-winning public art.	Sound Transit has continued to work with potentially impacted businesses during development of the Final EIS to minimize or avoid impacts where possible. The SODO Track has been added to Section 4.4, Social Resources, Community Facilities, and Neighborhoods, of the Final EIS as a social resource. Potential impacts to the artwork of the SODO Track on buildings that could be acquired as part of the project are identified within the limits of the West Seattle Link Extension, along with proposed mitigation. A response to this comment related to potential impacts to artwork on buildings within the limits of the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.
4	ST3 should include a focus on climate impacts, equity for isolated communities in Georgetown, and the need to finally fix the missing link from Georgetown to SODO, and plan to safely relocate vulnerable roadway users.	Please see Chapter 1, Purpose and Need, of the Final EIS for information on how the project would help meet state and regional environmental and sustainability goals, including those related to climate change. See Section 2.1.2, Components of Build Alternatives, of the Final EIS for more information on

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
		<p>how the project has accounted for climate change resilience during the design process. The City of Seattle Georgetown to Downtown Safety Project has been added to Chapter 5, Cumulative Impacts, and Appendix N.1, Transportation Technical Report.</p>
5	<p>Equally troubling about the plans to permanently damage SODO was the damage done to SODO by cutting it in half with the Link rail development itself. This became obvious when the DEIS was released and ST3 did not grant SODO 'Community Advisory Group' status. Instead, SODO was cut in two, and the SODO BIA was forced to attend both the West Seattle/Duwamish Community Advisory Group and the Chinatown International District SODO Community Advisory Group. This made it immensely difficult for property owners and businesses to understand the true impact the construction and final infrastructure will have on SODO, and it negatively impacted SODO's ability to equitably participate in the ST3 planning process. Advocacy efforts were split and had to fight for time with the other neighborhoods.</p>	<p>Your feedback regarding the Community Advisory Group process is noted. SODO's unique location as the area where the two extensions will connect made it important for this community to be engaged in evaluating alternatives for both extensions, because the choices to be made in SODO would affect choices to be made in adjacent areas, and vice versa.</p>
6	<p>With no material ST3 Link rail ridership to come from SODO businesses, workers, or residents, ST3 offers little to nothing in benefits for SODO. Rather, SODO businesses and workers will be temporarily and permanently displaced, and those still here will be suffering under ten years of construction disruption and traffic-jammed streets. Then, because the new SODO station will be a transfer station where riders must wait for trains, more crime can be expected at the station.</p> <p>These issues must be vigorously mitigated.</p>	<p>There are a number of businesses in the SODO area whose employees use the existing 1 Line to access their workplace, and the addition of a station serving another line at SODO will increase the number of employees who can access SODO employers from other parts of the city and region. Sound Transit's ridership model anticipates that almost 20 percent of the trips at this station will be walk or bike, which are likely people that live or work within the area. See Section 3.4, Affected Environment and Impacts during Operation—Transit, of the Final EIS for more discussion of station trip generation for each station. Please see Section 3.11, Construction Impacts, of the Final EIS for more information on construction period impacts and proposed mitigation. See Section 4.14, Public Services, Safety, and Security, of the Final EIS for more information on safety and security concerns.</p>
7	<p>The SODO BIA's first objection is to the permanent displacement of any business out of the SODO district. Many of our companies have been here for decades and depend on their proximity to the Port of Seattle, downtown, and the 1-5/1-90 interchange and cannot relocate easily. Taking these businesses means losing industrial land and demolishing and closing family businesses that have built the City and region and provide for its food security. As such, the final plan should prioritize ensuring that SODO historic small businesses and</p>	<p>Please see responses to CC4.1b and CC4.1d in Table 7-1 in Chapter 7, Comment Summary, of the Final EIS.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	companies like Pacific Iron and Metal and Franz's Bakery remain in SODO.	
8	<p>With regards to the alternatives in the DEIS, it was not possible for the SODO BIA to agree on which one was "best" because each alternative presents dire negative consequences for SODO and Seattle. Rather, our task was to focus on which alternative was the least worst or least objectionable. Collectively, the SODO BIA's preferred station alternative is 1b. This alternative would take the underutilized Post Office Garage at the corner of 4th &amp; Lander St. This garage is often cited as a public safety concern for pedestrians who must walk by it when accessing the current SODO station and is a barrier to community cohesion in SODO. Station 1b also moves the station and access to Lander St which is the main east-west connector for pedestrians accessing employment centers on 1st Ave S. This alternative appears to cause the least impacts to SODO legacy businesses and will create the best commuting option for those who do use the SODO station.</p>	<p>Your support for Option SODO-1b has been noted. Please see response to CCG2 in Table 7-1.</p>
9	<p>This new transfer station, bringing airporters, Downtown, and West Seattle together should be a premier station with amenities like drop-off and pick-up areas, ambassadors, restrooms, circulator buses, sidewalks, and safe pedestrian routes to major destinations and beyond.</p>	<p>Your feedback on station amenities has been noted. Some of these amenities, including drop-off and pick-up areas, bus transfer areas, and sidewalks, are already included in conceptual station plans shown in Appendix J, Conceptual Design Drawings, of the Final EIS. Sound Transit ambassadors are not dedicated to specific stations, but travel throughout the system over the course of the day. Sound Transit often focuses ambassadors at stations near event facilities when events are occurring. Additional improvements to access for pedestrians beyond the station area will be considered through the Sound Transit System Access Fund. The Sound Transit Board approved Resolution 2021-15, Passenger Restroom Policy Update, in October 2021. This policy update established criteria for when restrooms should be included at stations. This policy will be applied to the West Seattle Link Extension.</p>
10	<p>As such, with actual detailed planning in its infancy, and too many critical details still unknown and likely undecided, it remains imperative that the SODO BIA receive more technical assistance during ST3's planning and construction. Sound Transit should organize a multi-disciplinary team uniquely qualified to support SODO businesses and workers, solve traffic problems, provide relocation assistance, and create a premier station. One of the best ways Sound Transit and the City of Seattle can help the SODO BIA is by entering into a Memorandum of Agreement that will protect in place SODO's businesses, workers, residents, and commuters, and provide a high- performing multi-modal transportation network. This should include a SODO/Duwamish Community Advisory Group;</p>	<p>Sound Transit will take your suggestions into consideration and coordinate with the City of Seattle regarding your concerns. Please see Section 3.11, Construction Impacts, of the Final EIS for information on impacts to the SODO Trail during construction and the proposed detour. Sound Transit will continue to work with the community as final design advances and the details of construction plans are defined. See Section 4.3.7, Mitigation Measures, for</p>

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	<p>Neighborhood Traffic Mitigation Committee, Construction Hub Coordinator, Land Use planning, regular in-person/on-site information and meetings with SODO BIA leadership, and a Mitigation Fund. Most importantly, achieving the above-stated goals will only be possible with a significant SODO Mitigation Fund. Where ST3 condemnation payments and mitigation end, the City of Seattle should provide a SODO Mitigation Fund for businesses and workers impacted during construction, including displaced/relocated businesses and workers; complete replacement in-kind of the SODO Trail during and after construction; complete the missing Georgetown to SODO bike/pedestrian link; install a permanent stoplight at Forest and 4th Ave; create safe pedestrian routes to the Link rail (circulator buses, lighting, sidewalks, ambassadors, police response performance goals); and support other economic development activities.</p>	<p>more detail on how Sound Transit would coordinate with the community.</p>
11	<p><b>Request:</b> Disclose the lane widths, track widths, and LRT footprint widths used in the DEIS design on figures that are shown in the body of the DEIS.</p>	<p>Please see the design drawings provided in Appendix J, Conceptual Design Drawings, which was used to support the Final EIS analysis.</p>
12	<p><b>Request:</b> Include an analysis of transit riders by type in the equity analysis and disclose who benefits, and who bears the impact.</p>	<p>Please see Appendix G, Environmental Justice, of the Final EIS for information on impacts and benefits to low-income populations and communities of color.</p>
13	<p>For example, in Chapter 1 Purpose and Need the “South King County High-Capacity Transit Corridor” (2014d) is cited, and a statement is made that the study forecasts that “...light rail transit ridership would be higher than bus rapid transit ridership” for the West Seattle to downtown extension.” There is no citation as to how many additional riders would use light rail versus bus rapid transit. This lack of data in the DEIS limits the ability of the reader and stakeholders to evaluate the level of impact versus benefit. A small marginal difference in ridership would be a very different scenario than a large difference in ridership. In addition, transit forecasts would have substantially changed with permanent changes in transit ridership following the Covid pandemic. The Sound Transit system has substantially changed since the preparation of the 2014 study with BRT connecting Renton to Tukwila and Burien. A reduction in light rail ridership could warrant revisiting the light rail versus bus decision and a shift back to bus rapid transit would be a significant cost savings. The cost savings could also provide the opportunity to advance social equity by providing a higher level of transit service to the Georgetown and South Park neighborhoods.</p> <p><b>Request:</b> Present the data used in the statement that light rail transit ridership would be higher than bus rapid transit for the Downtown to West Seattle Link Extension based on the current ST3 conditions. Review and revise forecasts based on trip-making changes post Covid. See comments on Appendix N.1.A Methodology below. Include “advance social equity” in the consideration of South King County HCT extensions.</p> <p>For example, the “Third-party Funding” option of the SODO station alternatives is not explained in the chapters following Chapter 2 Alternatives Considered. It is unclear to the reader if</p>	<p>Please see responses to CC1a and CC2c in Table 7-1. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode identified for this corridor was light rail.</p> <p>This section of Chapter 1, Purpose and Need, is summarizing the planning history for the project corridor. For more information, please refer to the <i>South King County High Capacity Transit Corridor Study</i> (Sound Transit 2014d).</p> <p>No SODO Segment alternatives were identified in the WSBLE Draft EIS as requiring third-party funding.</p>

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	<p>the third-party element of the alternative is included in the project analysis. It is unclear what the project alternative is, and what the impacts and mitigation are if the third-party element is not funded. The source of third-party funding is not disclosed making it impossible to assess the risk of achieving third-party funding.</p>	
14	<p><b>Request:</b> In Table 2-1. Summary of West Seattle Link Extension Alternatives and Design Options Evaluated in the Draft Environmental Impact Statement, add the third-party funding option and clarify if the third-party funding option is included in the preferred alternative analysis within the subsequent DEIS chapters. Repeat the third-party funding assumptions and if the third-party option is included in the preferred alternative in each chapter of the DEIS and appendices. If third-party funding options are not part of the preferred alternative analysis, remove the third-party funding from all figures presenting analysis. Disclose the source of third-party funding and if there are any third-party funding commitments at the time of the document publication.</p>	<p>Please see response to CC2c in Table 7-1.</p>
15	<p><b>Request:</b> Add a purpose statement that speaks to protecting existing and planned land uses that are elements of the regional economy and the contribution to the regional economy. Expand upon the unique trip-making patterns of the MICs in the transportation chapter with appropriate analysis of those trips. Provide reference to the types of jobs and well-paying jobs that are unique economy of the MICs from the economic analysis.</p>	<p>Please see Chapter 1, Purpose and Need for West Seattle Link Extension, for the project’s Purpose and Need. An existing purpose statement includes encouraging equitable and sustainable urban growth in station areas through support of transit-oriented development and multi-modal integration in a manner that is consistent with local land use plans and policies. A more detailed study of the Manufacturing/Industrial Center’s trip patterns and associated jobs is not necessary for purposes of comparing alternatives in the Final EIS.</p>
16	<p>The following need statement is made in this section. “Most roadways in the project corridor cannot be expanded to accommodate increasing demand without substantial property acquisitions because of limited right-of-way.” It is inaccurate and disingenuous to make this statement about roadways when there is limited right-of-way for constructing the link rail alignment resulting in substantial property acquisitions for the link rail alignment, stations, and construction.</p> <p><b>Request:</b> Delete this need statement.</p>	<p>Please see response to CC2f in Table 7-1. Light rail expansion does require property acquisitions and displacements. The statement referenced is intended to demonstrate that the area need for roadway expansion would be greater to support a similar transportation capacity.</p>
17	<p><b>Request:</b> Use the revised regional forecasts expected in 2023 as the basis for WSBLE infrastructure decisions. The revised forecasts will affect the alternatives analysis for high-capacity transit (HCT) mode choice. The revised forecasts should re-visit the choice of bus versus rail to West Seattle. The revised forecasts should quantify the trip types by type of employment and establish the basis for those work trips that are a choice versus those work trips that are not a choice, and which work trips benefit versus those employment types that are impacted. Specifically, the land uses with employment in the SODO area are significantly impacted and the office-work jobs community between West Seattle and downtown are trips that are reduced,</p>	<p>Please see Section 3.2, Introduction and Methodology and Assumptions, of the Final EIS for a description of the methodology used for the transportation analysis. The Final EIS uses the same land use forecasts as the WSBLE Draft EIS as they were the most recent forecasts available when analysis began; Puget Sound Regional Council’s LUV-it forecasts were released subsequent to Final EIS analysis.</p>

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	trips made by choice, and trips receiving the benefit of the WSBLE project.	
18	<b>Request:</b> Revisit the project definition, consider scaling back, and provide additional funding to the SODO station to ensure the SODO station is developed to best serve the SODO community.	Sound Transit has continued to work with the City of Seattle and other stakeholders since the WSBLE Draft EIS to refine station locations and designs to maximize ridership, access, and passenger experience.
19	<p>Chapter 2. Alternatives Considered</p> <p>6.2.1 No Build Alternative</p> <p>The statement “Under the No Build Alternative, the WSBLE Project would not be built and there would be no new high-capacity transit in the project corridor.” is inaccurate. ST3 identifies a high-capacity transit (HCT) improvement for the West Seattle to Downtown corridor and does not specify the HCT mode. The 2014 alternatives analysis determined the mode as light rail and not a bus mode. The purpose and need for the WSBLE subsequently identified that the purpose is to build light rail. If light rail is not constructed bus HCT modes remain an option for the West Seattle to Downtown HCT corridor and new HCT could be built in the corridor. To state that “there would be no new high-capacity transit in the project corridor” is inaccurate. The proposed project could be revised and another HCT mode proposed.</p> <p><b>Request:</b> Revise the sentence to read, “Under the No Build Alternative, the proposed WSBLE Project in this DEIS would not be built. Alternative HCT modes would be re-evaluated, and a new build alternative would be proposed. The remainder of the paragraph and the second paragraph should be revised appropriately.</p>	The No Build Alternative definition is correct to not include high-capacity transit in the project corridor. The No Build condition is required under NEPA to include only the current transportation system as well as transportation investments committed to in the Transportation Improvement Plan. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode identified for this corridor was light rail.
20	<b>Request:</b> Prepare analysis to riders and travel time for the closure of the SODO busway, both in the permanent condition and during construction. Provide information on the transit riders affected.	Please see responses to CC3c, CC3e, and CC3f in Table 7-1. See Section 3.4, Affected Environment and Impacts During Operation – Transit, of the Final EIS for information on travel times and impacts to transit during operations and construction.
21	<p>The footnote in this sentence is not actually explained. The explanation is a generic description of what a formula fund is, but there is no explanation as to how formula funding affects transit providers.</p> <p><b>Request:</b> Provide an explanation of the formula funding and its effects on the SODO busway.</p>	This footnote has been updated in Chapter 3, Transportation, of the Final EIS to more clearly define formula funding. Please see the Federal Transit Administration website for additional information on funding.
22	<p>The number of transit riders passing through the SODO station, the transfers, and the boarding and alighting at the SODO station is important information for the reader to evaluate the impacts and benefits of the alternatives. This information is incomplete.</p> <p><b>Request:</b> Expend Table 3-6. 2042 P.M. Peak Hour Station Trip Generation by Mode (Boardings and Alightings) – West Seattle Link Extension, to include riders passing through the station,</p>	Please see responses to CC3e and CC3f in Table 7-1. Table 3-12 in Appendix N.1, Transportation Technical Report, of the Final EIS includes the number of daily riders transferring between light rail lines at the SODO Station and transferring to and from buses. Transit travel time is summarized

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	<p>transfers to light rail, transfers to bus, and boarding and alighting with destinations in SODO.</p> <p>Transit vehicle travel time is evaluated, but not travel time for transit riders. Impacts on transit riders boarding and alighting at the SODO station or transferring to bus are not disclosed.</p> <p><b>Request:</b> Evaluate travel time for riders at the SODO station with destinations in SODO and riders transferring to bus transit.</p>	<p>in Section 3.4.3.2, Transit Travel Time, of the Final EIS. The remaining information requested is not necessary for purposes of comparing alternatives in the Final EIS because the SODO station would be in the same location for all SODO alternatives and transfer times would be similar between alternatives.</p>
23	<p>Alternatives that close the Busway and shift buses to 4th Avenue South and 6th Avenue South are lacking in the evaluation of the quantity of buses and their operations during the am peak period, pm peak period, and the SODO mid-day peak. There are impacts associated with shifting 40 to 60 buses to arterial streets that have not been addressed. For example, during daytime hours the garbage trucks traveling to and from the recycling center can back up to one-half mile in both directions. Articulated buses have been observed blocking South Lander Street.</p> <p><b>Request:</b> Prepare bus transit operational analysis for buses shifting from the busway to arterial streets. Prepare analysis of street and intersection operations with buses shifting to arterial streets. Prepare infrastructure mitigation to manage bus operations, the increase in pedestrian travel to/from buses and the SODO station, conflicts with existing truck activity, and signal operations.</p>	<p>Additional traffic microsimulation analysis of how additional bus volumes on 4th Avenue South (due to the closure of the SODO Busway) would affect arterial operations, including trucks, has been added to Section 3.5, Affected Environment and Impacts During Operation - Arterial and Local Street Operations, of the Final EIS. The analysis also includes consideration of mitigation measures, such as freight and bus lanes, to improve transit times and the secondary effects of potential transit mitigation measures on other roadway users. Mitigation would be selected in collaboration with the City of Seattle. Revisions were also made in Section 9, Freight Mobility and Access, of Appendix N.1, Transportation Technical Report, of the Final EIS.</p>
24	<p>There are numerous rail facilities and rail owners in the SODO segment. A visual inventory of rail facilities is needed to understand the impacts to rail facilities, and the impacts of the alternatives in the context of rail facilities. The random text regarding impacts to rail facilities is difficult to follow and difficult to understand.</p> <p><b>Request:</b> Provide a figure showing the existing inventory of rail facilities including spurs and grade separations. Label each of the rail facilities, and destinations such as King Street Center, and indicate in the text the daily operations for those facilities. Show the future No Build in a figure and text and describe future plans and programs for each of the rail facilities. Disclose a past request by Amtrak to vacate South Holgate Street, which may again become an active request. In Chapter 5 it would be good to add the term with regard to the Amtrak proposal that it is a "reasonable foreseeable future action".</p>	<p>Maps related to existing freight facilities are provided in Chapter 9, Freight Mobility and Access, of Appendix N.1 Transportation Technical Report.</p> <p>See Section 5.1, Geographic and Temporal Boundaries of Cumulative Analysis, of the Final EIS for the definition of reasonably foreseeable future actions. Vacating South Holgate Street would not fall under this definition.</p>
25	<p><b>Request:</b> Confirm that the bus volumes, bus equivalent vehicle units, and bus dwell time are included in the L.O.S. analysis. Confirm the intersections analyzed for L.O.S. are adequate to disclose the impacts of shifting bus volumes to 4th Avenue South and 6th Avenue South. Disclose if there are transit signal priority treatments at intersections on 4th Avenue South and 6th Avenue South with the alternative or as mitigation. Review the document for consistency in shifted bus volumes (see Safety</p>	<p>Additional traffic microsimulation analysis of how additional bus volumes on 4th Avenue South (due to the closure of the SODO Busway) would affect arterial operations, including trucks, has been added to Section 3.5, Affected Environment and Impacts During Operation - Arterial and Local Street Operations, of the Final EIS. The microsimulation includes detailed</p>

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	<p>section). In the paragraph quoted above, site the data that confirms that intersection L.O.S. results would not change.</p>	<p>assumptions about the various vehicle types using the corridor, bus dwell times, and signal timings. The analysis also includes consideration of mitigation measures, such as freight and bus lanes, to improve transit times and the secondary effects of transit mitigation measures on other roadway users. Mitigation would be selected in collaboration with the City of Seattle. Revisions were also made in Section 9, Freight Mobility and Access, of Appendix N.1, Transportation Technical Report.</p>
26	<p><b>Request:</b> Prepare a safety analysis of closing the SODO Non-motorized trail and of closing the E3 busway. Quantify and show the increase in modal conflicts for all modes. Quantify and show the effects of closing the SODO nonmotorized trail on the pedestrian and bicycle network to and from important origins and destinations such as employment on 1st Avenue South and the Georgetown and South Park neighborhoods and the resulting travel on 1st Avenue South, 4th Avenue South, and 6th Avenue South. Use the “Safety Systems Approach” to evaluate the increase in risk of bicycle travel on similar arterials compared to a protected facility.</p> <p>Quantify and show the increase in modal conflicts for shifting buses to arterial streets along the length of the routes used due to the closure of the Busway. Show midday conflicts with freight traffic. Show the changes to the rider walk routes to bus stops and the increase in modal conflict. Disclose that an increase in modal conflict results in an increase in crashes between modes.</p>	<p>See Section 3.8, Affected Environment and Impacts During Operation - Safety, of the Final EIS for an updated discussion of safety. Section 7, Safety, of Appendix N.1, Transportation Technical Report, provides additional detail on the safety evaluation.</p> <p>Text has been added to Section 3.11, Construction Impacts, of the Final EIS about a potential detour location for the SODO Trail. The details of the design will continue to be determined in coordination with the City of Seattle.</p> <p>Please see responses to CC3c and CC3f in Table 7-1.</p>
27	<p>There is a statement, “With Alternative SODO-2, the elevated guideway for the West Seattle Link Extension would be grade-separated from the roadway. No portion of the guideway would be within the roadway, and it would not impact vehicle safety.”</p> <p><b>Request:</b> Show the location of the light rail guideway piers and confirm if the locations of bridge piers would have local impacts on all modes and traffic during construction.</p>	<p>Conceptual design, such as the location of guideway columns as shown in Appendix J, Conceptual Design Drawings, were used in the safety analysis. Please see response to CC3b in Table 7-1.</p>
28	<p>Section 3.8.4 Mitigation for Operation Impacts states, “no further mitigation specific to safety-related impacts is proposed”. Closing the SODO nonmotorized trail will result in an increase in serious injuries and fatalities as bicyclists and pedestrians shift from a protected pathway to arterial streets. The Georgetown and South Park neighborhoods will no longer have a grade-separated bicycle facility to their nearest Link station, the SODO station. Current social equity policy should guide Sound Transit to maintain the same level of protection for bicyclists traveling to and from Georgetown and South Park that is currently provided by the SODO trail with mitigation for the loss of the trail, for alternatives that close the trail, and during construction.</p> <p><b>Request:</b> Develop mitigation for the alternatives that close the SODO nonmotorized trail in the form of equivalent built infrastructure.</p>	<p>Text has been added to Section 3.11, Construction Impacts, about a potential detour location for the SODO Trail. The details of the design will continue to be determined in coordination with the City of Seattle.</p> <p>Please see response to CC3b in Table 7-1.</p>



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29	<p>The effect on safety with the closure of streets is inaccurate. The qualitative analysis bases the conclusion that traffic volumes will be the same and therefore the number of crashes would be the same. This conclusion may or may not be accurate. The safety of a street is related to traffic volume and the mix of traffic including truck volume, posted and operating speeds, operations at intersections, driveways characteristics, lighting, lane widths, sidewalks, presence of bicycle facilities, and rail lines. A comparison of the relative safety of streets used for detours and during street closures should address these factors and their influence on safety.</p> <p><b>Request:</b> Prepare a safety analysis of permanent conditions and conditions during construction for street closures and of traffic shifted to other streets. For resources, refer to the Washington State Department of Ecology SEPA Checklist Guidance Section B: Transportation (<a href="https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation">https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation</a>) and that includes reference to the federal document, Integrating Road Safety into NEPA Analysis, A Practitioner’s Primer, Federal Highway Administration (<a href="https://safety.fhwa.dot.gov/tsp/fhwasa1137/fhwasa1137.pdf">https://safety.fhwa.dot.gov/tsp/fhwasa1137/fhwasa1137.pdf</a>)</p>	<p>Traffic volume is not the only factor for safety impacts, but it is an important one. The Final EIS also analyzes operational and geometric risk factors for motor vehicles and non-motorized users, such as sightlines and exposure to conflict points.</p> <p>Please see responses to CC3b and CC3c in Table 7-1.</p>
30	<p>The City of Seattle Vision Zero plan is not sourced properly in the text.</p> <p><b>Request:</b> Source the Vision Zero plan.</p>	<p>The Final EIS references the Seattle Department of Transportation’s <i>Vision Zero 2019 Update</i> (City of Seattle 2019) and discusses the high injury corridors identified therein.</p>
31	<p><b>Request:</b> Prepare an analysis and disclose impacts during construction for each of the elements of the environment. Prepare a detailed and quantified analysis as if a permanent condition. Include street operations, changes in circulation and the resulting L.O.S., changes in bus operations on the streets, impacts to transit riders, pedestrians, and bicyclists. Eliminate the word “temporary” when referring to construction impacts. Use time-related adjectives such as “a two-week closure” or a “three-month closure”. Show construction phasing and durations.</p>	<p>Please see response to CC3c in Table 7-1. See Attachment N.1E of Appendix N.1, Transportation Technical Report, for more information on road closures during construction. Chapter 3, Transportation Environment and Consequences, and Chapter 4, Affected Environment and Environmental Consequences, of the Final EIS include an analysis of potential impacts during construction for each element of the environment.</p> <p>General durations for various construction activities are provided in Section 2.7.10, Duration of Construction Activities, of Chapter 2, Alternatives Considered, of the Final EIS.</p> <p>Construction phasing and durations of specific phases will be further defined during final design.</p>
32	<p>The following section and text: “3.11.2.5 Safety However, the SODO Trail would be temporarily closed (see Section 3.11.2.4), requiring pedestrians and bicyclists to likely detour to 4th Avenue South or 6th Avenue South instead of to a multi-use</p>	<p>Text has been added to Section 3.11, Construction Impacts, of the Final EIS about a potential detour location for the SODO Trail. The details of the design</p>

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	<p>facility, which would increase the potential for conflicts with vehicles.” This is an inadequate analysis and conclusion.</p> <p><b>Request:</b> Prepare a quantified analysis of the increase in modal conflicts during construction. Disclose that an increase in conflicts results in an increase in crashes. Compare crash rates and severity on similar arterials over a ten-year period. Prepare infrastructure solutions to mitigate the safety impacts.</p>	<p>will continue to be determined in coordination with the City of Seattle.</p> <p>Please see response to CC3b in Table 7-1.</p>
33	<p>The study area, and construction analysis, does not address the needs of truck/freight mobility. Truck access and mobility is a larger area than the study area. Analysis is needed that addresses truck movement in the area between the 0.5-mile study area radius and the regional analysis.</p> <p><b>Request:</b> Expand the study area for truck/freight movements to and from major destinations by SODO businesses. Show detour routes for truck movements.</p>	<p>Additional traffic microsimulation analysis was completed for the Final EIS at key closure locations during construction. See Section 3.5, Affected Environment and Impacts During Operation - Arterial and Local Street Operations, of the Final EIS. Revisions were also made in Section 9, Freight Mobility and Access, of Appendix N.1, Transportation Technical Report. Construction mitigation would be selected in collaboration with the City of Seattle and in coordination with the project contractor, including accommodating truck/freight movements through the areas affected by project construction.</p> <p>Please see response to CC3b in Table 7-1.</p>
34	<p>3.19.2.5 Safety</p> <p>The sentence that reads, “...as collisions are correlated with traffic volumes” is incorrect. This statement ignores operations and geometric factors in safety. The conclusion, “...would be a negligible overall safety impact” cannot be made based on the incorrect qualitative assessment relative to traffic volumes.</p> <p><b>Request:</b> Prepare a safety assessment of facilities used by diverted traffic considering operational and geometric factors. Define “negligible” in the context of Seattle’s Target Zero plan.</p>	<p>Traffic volume is not the only factor for safety impacts, but it is an important one. The Final EIS also analyzes operational and geometric risk factors for motor vehicles and non-motorized users, such as sightlines and exposure to conflict points..</p> <p>The Final EIS addresses Vision Zero priority locations.</p>
35	<p>13.19.7.2 Does not speak to coordination with stakeholders in the preparation of a Construction Access and Traffic Management Plan.</p> <p><b>Request:</b> Include mitigation measures that commit to coordination and communication with stakeholders.</p>	<p>Please see responses to CC3d and CC4.3d in Table 7-1. Sound Transit will continue to work with the community as final design advances and the details of construction plans are defined. See Section 4.3.7, Mitigation Measures, in Section 4.3, Economics, of the Final EIS for more detail on how Sound Transit would coordinate with the community.</p>
36	<p>4.2.1 Acquisitions, Displacements, and Relocations</p> <p>The location of tables and maps of displaced properties is not clear to the reader. The title of Appendix L “Chapter 4 Supporting Information on Affected Environment and Environmental Impacts”, does not reflect the content of Appendix L.</p>	<p>Appendix L, Chapter 4 Supporting Information on Affected Environment and Environmental Impacts, contains supporting information for multiple resource sections of Chapter 4. Appendix L4.1 is an appendix within the larger appendix that supports the section of the Final EIS related to project acquisitions, displacements, and</p>

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	<p><b>Request:</b> Revise the title of Appendix L as follows: "Acquisitions, Displacements, and Relocations". Revise the following reference as follows: Appendix L4.1, Acquisitions, Displacements, and Relocations, lists potentially affected parcels in tables and shows the parcels in maps.</p>	<p>relocations, and is clearly referenced in Section 4.1, Acquisitions, Displacements and Relocations, of the Final EIS. Additional appendices related to Chapter 4 are also included in Appendix L and are referenced in their relevant sections of the Final EIS.</p>
37	<p>The DEIS does not explain how the following City of Seattle policy has been impacted. The City has identified the industrial nature of SODO in the manufacturing/industrial center designation and has plans and policies in place to protect existing industrial land uses given their crucial role in the city and regional economies. Chapter 4 indicates that 16-17 businesses would be displaced. There is no discussion of the types of business and the importance to the Duwamish MIC.</p> <p><b>Request:</b> Provide information as to the types of business, their industrial, manufacturing, and commercial activity, size in acreage and employees, the importance of their location in the Duwamish MIC, and role in the economy.</p>	<p>Please see response to CC4.3d in Table 7-1. Consistency with City plans is described in Appendix L4.2, Land Use, of the Final EIS.</p>
38	<p>The text referred to above goes on the say, "As a result, potential future land uses are similar to existing land uses in this segment." This statement is not accurate and would indicate there is no impact to the Duwamish MIC land uses.</p> <p><b>Request:</b> Disclose the reduction in useable land in absolute numbers including acreage and employees as a land-use impact. Percentages are not a transparent disclosure.</p>	<p>Similar to the information presented in the WSBLE Draft EIS, Table 4.2-3 of the Final EIS shows future land use acreage converted by the project. Future land uses are determined by City of Seattle Zoning. Per Sound Transit's methodology for this analysis, the direct impacts qualitatively consider the scale of land use conversion within the context of the overall jurisdiction and identified comprehensive plan areas. Comparing land conversion by type of City land use is consistent with the methodology.</p> <p>Section 4.3, Economics, identifies the number of employees affected by each alternative.</p>
39	<p>The sentence, "For all SODO Segment alternatives, spur tracks along the SODO Busway north of South Forest Street would be removed, which would affect rail access to businesses." is followed by text that discusses the United States Post Office. It is unclear where to find text that identifies the tracks removed and the effect to businesses.</p> <p><b>Request:</b> Provide information on the tracks removed and businesses affected. See the request above for a comprehensive presentation of rail facilities.</p>	<p>Impacts to businesses are described in Chapter 4.3, Economics. Impacts to freight are described in Section 3.10, Affected Environment and Impacts During Operation – Freight Mobility and Access, and Section 3.11, Construction Impacts. Additional information is provided in Section 9, Freight Mobility and Access, of Appendix N.1, Transportation Technical Report.</p>
40	<p>This sentence is not accurate: "There would be no impacts to neighborhood cohesion."</p> <p><b>Request:</b> Define "neighborhood" and acknowledge that the SODO area is a neighborhood of industrial and commercial activity. Define "cohesion" and identify the cohesion that would be impacted or not by the alternatives.</p>	<p>These terms were defined in Section 4.2.4.1.1, Neighborhood Cohesion and Social Resources, of the WSBLE Draft EIS and in Section 4.4.2.1 of the Final EIS. Cohesion is discussed for each neighborhood in the study area,</p>

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		including the Industrial District neighborhood that includes SODO.
41	<p>Chapter 5 Cumulative Impacts and Appendix K, Present and Future Developments, Transportation, and Public Works Projects in the Study Area, are missing the Seattle Industrial &amp; Maritime Strategy Council recommendations and the DEIS. The lack of information from the Seattle Industrial &amp; Maritime Strategy Council recommendations and the DEIS land use impacts and the effect within the context of the SODO station alternatives is confusing.</p> <p><b>Request:</b> Provide The Seattle Industrial &amp; Maritime Strategy Council recommendations and the DEIS should be presented in Chapter 5.</p>	<p>The Seattle Industrial and Maritime Strategy was a draft and not approved by the City of Seattle when the WSBLE Draft EIS was published. The strategy was approved in July 2023. The Final EIS was updated to incorporate discussion of consistency with this strategy in Appendix L4.2, Land Use.</p>
42	<p><b>Request:</b> Prepare a summary of the legal framework for property acquisition of the USPS and share with stakeholders. Add a footnote or endnote for the conversation that occurred where the USPS indicated the taking of 14 property spaces would require relocating the facility. Prepare a utilization study of the USPS parking spaces and develop mitigation. The USPS is a public facility.</p>	<p>Please see response to CC4.1d in Table 7-1. Impacts and mitigation related to the United States Postal Service (USPS) are described in Section 4.14, Public Services, Safety, and Security. The Federal Transit Administration and Sound Transit coordinated extensively with USPS about the potential effects to the facility and the steps required to relocate the facility if needed.</p>
43	<p>Table 6-1. Projected Ridership and Key Impact Differences – SODO Segment. This table is missing a column for the No-Build alternative, which is necessary for decision-making and consistency with other Sound Transit DEISs. The Resource Impact Measure only includes Public Service Impact and that measure only includes the USPS. As stated above, the framework for decision-making with regard to the USPS has not been established.</p> <p><b>Request:</b> Redefine the measure as “USPS impacts”, as no other resources are evaluated. Provide the legal framework for property impacts, taking, and mitigation of the USPS and Sound Transit. Add footnote that sources the conversation indicating that the loss of 14 spaces would require relocating the facility.</p>	<p>Future conditions for the No Build Alternative are described in Section 6.2.1, No Build Alternative, of the Final EIS. Table 6-1 is a list of key impact differences between the Build Alternatives. For the SODO Segment, the key difference for public service impacts is at the USPS building. Additional information can be found in Section 4.14, Public Services, Safety, and Security. Also see response to comment 42, above.</p>
44	<p>Table 6-1 is missing key impacts to riders for whom the station is being constructed.</p> <p><b>Request:</b> Summarize rider impacts including rider travel times between the station and a consistent location on the surface street network, rider personal safety, transfers, and changes in the 10-minute walkshed for riders with each station design. A 15-minute walkshed is recommended for station-area planning of a light-rail facility.</p>	<p>The areas pointed out in this comment are not considered key impact differentiators between alternatives.</p>
45	<p>Attachment N.1A Transportation Technical Analysis Methodology Report</p> <p>The effects of Covid on traditional downtown transit ridership are permanent. These effects include work-from-home as an option. One day per week of work-from-home by office workers would be a 20% decrease in these types of trips. In addition, it should be noted that traditional office workers have a choice,</p>	<p>Please see response to CC1a in Table 7-1.</p>

## Appendix O. Draft EIS Comment Summary and Response to Comments

#	Comments	Responses
	<p>and essential workers including industrial and manufacturing workers do not have a choice. There are significant infrastructure investment decisions yet to be made by Sound Transit even after analysis of the current preferred alternative. These decisions should be made with revised forecasts reflecting a range of commute conditions possible in the post-Covid scenario.</p> <p><b>Request:</b> Revise the methodology and forecasts to disclose the long-term effects of work-from-home employment on the forecasts.</p>	
46	<p>The early decision (2014) to provide light rail versus bus to West Seattle should be revisited considering the reduction in traditional office-worker commute patterns to downtown Seattle. The DEIS simply states that there would be more riders on light rail to West Seattle than on bus rapid transit but does not disclose the magnitude, based on the 2014d study.</p> <p><b>Request:</b> Develop a methodology to use the revised forecast to disclose the magnitude of the difference in ridership between light rail to West Seattle and Bus Rapid Transit. Confirm if the 2014 decision is still valid in 2042.</p>	<p>Please see response to CC1a in Table 7-1. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode identified for this corridor was light rail. This section of Chapter 1, Purpose and Need for West Seattle Link Extension, is summarizing the planning history for the project corridor. For more information, please refer to the <i>South King County High Capacity Transit Corridor Study</i> (Sound Transit 2014d).</p>
47	<p>Travel time analysis for riders to/from stations including transfers and walk times is missing from the methodology. Include the added travel time for riders that were on the busway and then shifted to buses 4th Avenue South and 6th Avenue South.</p> <p><b>Request:</b> Add travel time analysis methodology for riders.</p>	<p>The ridership forecast model incorporates transfer times. Travel time is included in the methodology as discussed in Section 3.1, Introduction to Transit, in Appendix N.1, Transportation Technical Report.</p>
48	<p>The study area, and subsequent analysis, does not address the needs of truck/freight movement. Truck access and mobility is a larger area than the study area. In addition, the narrow study area does not account for significant diverted traffic on roadways beyond the 0.5-mile study area.</p> <p><b>Request:</b> Expand the study area for truck/freight movements to and from major destinations by SODO businesses.</p>	<p>In addition to the construction analysis completed in the immediate closure areas, the Final EIS evaluates potential diversion routes and volumes on roadways and regional facilities outside the study area. See the environmental impacts presented in Sections 2.3 and 4.3 in Appendix N.1, Transportation Technical Report of the Final EIS.</p>
49	<p>The following sentence is insufficient: "There could be some traffic circulation and property access changes after construction related to properties that have been fully or partially acquired during construction."</p> <p><b>Request:</b> Identify fully or partially acquired properties that would have changes in access and/or traffic circulation.</p>	<p>Changes in access and/or traffic circulation where properties would be fully acquired would depend on how any surplus properties are developed after construction, which is unknown at this time. Where partial property acquisitions are proposed, business access during construction and operations was considered when determining if a business would be displaced.</p>
50	<p>The United States Postal Service (USPS) is a public agency with a parking facility with exclusive parking. There is the loss of 14 surface parking stalls that drives the need for the preferred alternative, with significant impacts on adjacent properties. Given the quantity of garage parking, and that the USPS is a</p>	<p>A parking utilization study for this site is not within the scope of this project. The information presented in the Final EIS is based on consultation between the federal agencies and Sound Transit.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>public agency, this facility warrants a parking utilization study to provide information and data to develop mitigation for the loss of 14 stalls versus the relocation of businesses.</p> <p><b>Request:</b> Revise the methodology to provide for parking utilization study of public facilities with off-street parking.</p>	
51	<p>3 Transit</p> <p>The text and tables do not show where the congestion occurs that results in increased travel time for existing transit.</p> <p><b>Request:</b> Describe and quantify the major sources of congestion, the location, and the cause of congestion.</p>	<p>Existing bus routes without dedicated facilities would be affected by increasing congestion over the next two decades as described in Section 4.3 in Appendix N.1, Transportation Technical Report. Please see Attachment N.1B, Existing and Future Transit Routes and Levels of Service, to Appendix N.1 for more information on transit L.O.S.</p>
52	<p>The text and tables do not show where the location and cause of reduced transit reliability.</p> <p><b>Request:</b> Describe and quantify the major sources of reduced reliability, the location, and the cause of the LOS E and F reliability measure.</p>	<p>Please see response to comment 51.</p>
53	<p>The existing passenger loads show that there is existing transit capacity through SODO and the West Seattle corridor. Depending on where the existing travel time and reliability issues occur and solutions to those issues, there may be the ability to reduce transit travel time for buses. Considering the permanent changes to transit ridership post-Covid, the strategy to reduce bus delays could be revisited. The additional bus travel time on 4th Avenue South and 6th Avenue South should be considered in the analysis.</p> <p><b>Request:</b> Provide information and data on existing sources of bus delays and future sources of bus delays.</p>	<p>Please see response to CC1a in Table 7-1. Existing bus routes without dedicated facilities would be affected by increasing congestion over the next two decades as described in Section 4.3 in Appendix N.1, Transportation Technical Report. Please see Chapter 1, Purpose and Need for West Seattle Link Extension, for more information on the need for the project.</p>
54	<p>6 Non-motorized Facilities</p> <p>Figure 6-1: Existing Pedestrian Facilities West Seattle and Ballard Link Extensions - SODO Segment. This figure does not show existing pedestrian facilities.</p> <p><b>Request:</b> Inventory and show existing pedestrian facilities, including sidewalks, within the 10-minute walkshed of the SODO station.</p>	<p>Figure 6-2 in Appendix N.1, Transportation Technical Report, shows the existing sidewalk conditions in the SODO Station area walkshed.</p>
55	<p>The walkshed for each alternative does not provide a useful comparison of alternatives for the rider and pedestrian. The 10-minute walkshed, while a nominal industry standard for walk distance to a bus stop is longer for light rail. Major employment destinations for SODO station users are on 1st Avenue South and are outside the 10-minute walkshed. The walk segment of a transit rider's trip is a critical component of the rider's transit trip. The walk segment varies for the existing condition, Build, and No Build Alternative. An analysis of the walk segment would provide a comparison of each condition and the whether the goals defined during station concept development were achieved.</p>	<p>Walksheds for each SODO Station alternative are shown and described in Section 6.2, Affected Environment, in Appendix N.1, Transportation Technical Report, along with sidewalk condition information for the facilities within the walkshed. Additional information is provided in Attachment N.1E, Pedestrian Level of Service, to Appendix N.1. The analysis requested is not necessary for purposes of comparing alternatives in the Final EIS because the SODO Station would be in the same location for all SODO alternatives.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p><b>Request:</b> Provide an analysis in graphic form and tables showing the rider’s walk route to/from the station for the a.m. and p.m. peak hour within the walkshed for the existing condition, future No Build and Build Alternatives. Show the travel time for walk routes for the No-Build and Build alternatives, including use of escalators and elevators, to/from the station platform to pedestrian facilities, and on pedestrian facilities including changes in grade and wait time at signalized intersections. Major employment destinations for SODO transit riders are on 1st Avenue South and are outside the 10-minute walkshed. These employment destinations include the Starbucks complex with Amazon, the John Stanford Center for Education Excellence, and the Home Plate Center. Include these major employers in the walk route analysis. Describe the walk environment in terms of the pedestrian environment and personal safety from the rider’s perspective.</p>	<p>Sound Transit has continued to work with the City of Seattle and other stakeholders since the WSBLE Draft EIS to refine station locations and designs to maximize ridership, access, and passenger experience.</p> <p>No change made in response to this comment.</p>
56	<p>The walksheds and bikesheds are not described in the Attachment N.1A Transportation Technical Analysis Methodology Report.</p> <p><b>Request:</b> Revise the non-motorized methodology to eliminate walksheds. A walkshed analysis is not an analysis of nonmotorized impacts and mitigation. Provide a description of a methodology to evaluate walk routes and impacts on the walk routes by alternative for the SODO station.</p>	<p>Walksheds and bikesheds are described in Section 6.3.2.1, Long-term Impacts, in Appendix N.1, Transportation Technical Report. Figure 6-2 in Appendix N.1 shows the existing sidewalk conditions in the SODO Station area walkshed.</p>
57	<p>Figure 6-1: Existing Pedestrian Facilities West Seattle and Ballard Link Extensions – SODO Segment, does not show the inventory of pedestrian facilities within one-half mile of the station. There is no information presenting the results of the non-motorized evaluation measures as described in Attachment N.1A Transportation Technical Analysis Methodology Report.</p> <p><b>Request:</b> Show in a figure the inventory of non-motorized facilities, including the quality of the walk route within one-half mile of the station for the existing condition, No-Build and Build conditions. Include a comparison of changes in grade for the pedestrian route in the analysis of pedestrian circulation.</p>	<p>Figure 6-2 in Appendix N.1, Transportation Technical Report, shows the existing sidewalk conditions in the SODO Station area walkshed. The walkshed analysis takes grade into account.</p>
58	<p>The following sentence is not understood. “A high volume of pedestrians is expected on 5th Avenue South and the SODO Busway north of South Lander Street; however, this is the location of the station platform, which would have an effective width large enough to accommodate the forecasted pedestrian volumes.” It is unclear what is a high volume of pedestrians and why they are on 5th Avenue South and the add-on, “however this is the location of the platform”.</p> <p><b>Request:</b> Present the a.m. and p.m. peak hour pedestrian volumes estimated on the platform, the access/egress facilities, and the pedestrian facilities in the walkshed. Show in a table the a.m. and p.m. peak hour pedestrian volumes uniquely identifying the transfers.</p>	<p>Please see response to CC3a in Table 7-1. This text has been revised in the Final EIS for clarity.</p> <p>Pedestrian level of service analysis was completed for all facilities within a block of the station; the results are summarized in Section 6.3 in Appendix N.1, Transportation Technical Report. Detailed tables are provided in Attachment N.1E, Pedestrian Level of Service, to Appendix N.1. Table 3-12 in Appendix N.1 includes the number of daily riders transferring between light rail lines at the SODO Station and transferring to and from buses.</p> <p>Figure 6-2 in Appendix N.1 shows the existing sidewalk conditions in the SODO Station area walkshed.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
59	<p>4.2.3.2 Construction Mitigation</p> <p>This section lacks sufficient detail for the complexity of the construction activities and their impacts. The proposed mitigation is inadequate for stakeholders to assess access and mobility impacts, if mitigation rectifies the impact, and if there is permanent damage to businesses.</p> <p><b>Request:</b> Prepare, describe, and show in figures the impacts of construction to the street system, to the busway, to the SODO trail, to buses, and the displacement or access and circulation impacts to business in SODO. Prepare construction mitigation measures to mitigate the impacts.</p>	<p>Please see response to CC3c in Table 7-1.</p>
60	<p>Construction activity of up to ten years is essentially a permanent condition for SODO BIA. The impacts to streets and mobility for SODO businesses, pedestrian and bicycle facilities, the busway, and impacts to riders have not been addressed. Short-term weekday closures can have a significant impact on industrial businesses and truck mobility.</p> <p>Closures of more than one week warrant detailed analysis of construction impacts to adequately understand the impacts and develop mitigation measures. See prior comments on the missing impact analysis of the closure of the busway, impacts to riders and their walk routes, impact to riders transferring between light rail and bus, impacts to bicyclists and pedestrians with the closure of the SODO trail.</p> <p><b>Request:</b> Prepare an impact analysis covering operations and safety for all modes affected by construction closures. Prepare infrastructure mitigation to address the operational and safety impacts.</p>	<p>Please see responses to CC3b and CC3c in Table 7-1.</p>
61	<p>Early and frequent communication with property owners, street users, transit users, pedestrians, and bicyclists will be essential.</p> <p><b>Request:</b> Include a description and commitment of the communication program as construction mitigation. Include the types of communication, tools, frequency, stakeholder outreach, property owner outreach and communication, and a dedicated construction communication coordinator.</p> <p>Construction activities are extensive, each with impacts and mitigation. The construction mitigation should include a commitment to a construction management plan with outreach and input by stakeholders and include a Memorandum of Understanding with the SODO BIA for construction activities and mitigation.</p>	<p>Sound Transit will continue to work with the community as final design advances and the details of construction plans are defined. See Section 4.3.7, Mitigation Measures, in the Final EIS for more detail on how Sound Transit would coordinate with the community.</p>





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)

## Appendix O. Draft EIS Comment Summary and Response to Comments

### Communication ID: 504379 - Seattle Marine Business Coalition Draft EIS Comment

#	Comments	Responses
1	<p>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 15th Avenue Station Option (IBB-2b) as the preferred alternative. The DEIS details that the current Preferred Elevated 14th 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 15th 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.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
2	<p>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.</p>	<p>Additional discussion of impacts on freight mobility in the SODO Segment has been added to Section 3.10, Affected Environment and Impacts during Operation—Freight Mobility and Access, and Section 3.11, Construction Impacts, of the West Seattle Link Extension Final EIS. Discussion of cumulative effects to both Manufacturing and Industrials Centers has been added to Chapter 5, Cumulative Impacts. A response to this comment related to the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.</p>
3	<p>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</p>	<p>Please see responses to CCG2, CC4.3c, CC4.9b, and CC4.17a in Table 7-1. The analysis of Preferred Alternative DUW-1a has been updated in the Final EIS based on additional design work and coordination with permitting agencies, and the design no longer includes bridge columns in the</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

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#	Comments	Responses
	<p>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.</p>	<p>West Waterway. Please see Section 3.10, Affected Environment and Impacts during Operation—Freight Mobility and Access, and Section 3.11, Construction Impacts, for more information on potential impacts to freight operations.</p>



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

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504814 - Seattle Metropolitan Chamber of Commerce Draft EIS Comment**

#	Comments	Responses
1	<p>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.</p>	<p>Thank you for expressing support for the project.</p>
2	<p>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 (I BB-2b) as the preferred alternative. While the Tunnel 14th Alternative (I BB-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.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
3	<p>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.</p> <p>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</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>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.</p>	
4	<p>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.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
5	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
6	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
7	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
8	<ul style="list-style-type: none"> <li>• 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</li> </ul>	<p>A response to this comment will be provided as part of the environmental</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>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.</p>	<p>review process for the Ballard Link Extension.</p>
<p>9</p>	<p>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.</p> <p>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 (CI D-1b) and the 5th Avenue Deep Station Option (CI D-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.</p> <p>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.</p>	<p>A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.</p>
<p>10</p>	<p>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</p>	<p>Please see response to CCG2 in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. See Chapter 2, Alternatives Considered, of the Final EIS for discussion of the new Preferred Option</p>



**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>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.</p>	<p>SODO-1c in the SODO Segment, which modified Alternative SODO-1a to address concerns about impacts to businesses, U.S. Postal Service facilities, and station access. Please see Chapter 5, Cumulative Impacts, of the Final EIS for more information on how the project would improve access to the Duwamish Manufacturing/Industrial Center.</p>
11	<p>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.</p>	<p>Additional discussion of impacts on freight mobility in the SODO Segment has been added to Section 3.10, Affected Environment and Impacts during Operation—Freight Mobility and Access, and Section 3.11, Construction Impacts, of the Final EIS. Discussion of cumulative effects to both Manufacturing and Industrials Centers has been added to Chapter 5, Cumulative Impacts. A response to this comment related to the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.</p>
12	<p>The project must also consider the City of Seattle's Industrial and Maritime Strategy and pursue transit-oriented development consistent with existing zoning.</p>	<p>Information on the City of Seattle's Industrial and Maritime Strategy has been added to Section 4.2, Land Use, of the Final EIS. This section also discusses transit-oriented development potential around stations.</p>
13	<p>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 Terminals 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.</p>	<p>Please see response to CCG2 in Table 7-1.</p>
14	<p>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</p>	<p>Please see response to CCG2 in Table 7-1. Please see Section 3.5, Affected Environment and Impacts during Operation—Arterial and Local Streets Operations, of the Final EIS for</p>

## Appendix O. Draft EIS Comment Summary and Response to Comments

#	Comments	Responses
	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.	information on access changes to Nucor Steel.
15	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.	Please see responses to CCG2 and CC3a in Table 7-1. Please see Section 4.1, Acquisitions, Displacements, and Relocations, and Section 4.9, Ecosystems, of the Final EIS for information on mitigation for displacements and impacts to Longfellow Creek. Sound Transit strives to support equitable transit-oriented development around stations and explores opportunities to partner in potential development, with a priority on uses that benefit communities such as affordable housing. Please see Section 4.2, Land Use, of the Final EIS for more information.
16	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.	Please see response to CCG2 in Table 7-1.
17	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.	Please see response to CC2f in Table 7-1. Please see Section 4.2, Land Use, of the Final EIS for more information on the transit-oriented development potential of the project.
18	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	A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>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.</p> <p>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</p>	

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>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.</p>	
19	<p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>	<p>Please see response to CC2a in Table 7-1. Sound Transit would work with the City of Seattle to develop and implement a construction management plan for the project. A response to the comments on impacts in Downtown Seattle and the Chinatown-International District will be provided as part of the environmental review process for the Ballard Link Extension.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>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.</p>	
20	<p>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.</p>	<p>These mitigation suggestions were considered for inclusion in the Final EIS. Mitigation measures for neighborhood impacts are detailed in a number of sections such as economics in Chapter 4, Affected Environment and Environmental Consequences, for all alternatives and in Appendix I, Mitigation Plan, for the West Seattle Link Extension preferred alternative. Please see response to CC2f in Table 7-1 for more information about community involvement in station planning. A response to the comment relating to the Chinatown-International District neighborhood will be provided as part of the environmental review process for the Ballard Link Extension.</p>
21	<p>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.</p>	<p>Please see responses to CCG2, CCG3, CC2c, and CC2f in Table 7-1. Please see Section 2.9, Project Funding and Cost Comparison, of the Final EIS for updated capital costs of the alternatives.</p>

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1131 SW Klickitat Way  
Seattle Washington  
98134  
800/422-3505 tel  
206/823-0179 fax

April 28, 2022

WSBLE Draft EIS Comments c/o Lauren Swift  
Sound Transit  
401 S Jackson St  
Seattle WA 98104

Via email: [WSBLEDEIScomments@SoundTransit.org](mailto:WSBLEDEIScomments@SoundTransit.org)

Re: West Seattle and Ballard Link Extensions Draft EIS Comments

On behalf of SSA Marine, Inc. (SSA) and our affiliated family of companies (including Carrix, Inc., SSA Terminals, Tideworks Technology, Rail Management Services and Harbor Real Estate Investment Company), thank you for the opportunity to submit comments on the Sound Transit West Seattle Ballard Link Extensions (WSBLE) Draft Environmental Impact Statement (DEIS).

SSA has attended public meetings, thoroughly reviewed DEIS documents and hosted/attended a Sound Transit Briefing for the Duwamish Crossing (on April 21, 2022) to understand the DEIS Alternatives' potential impacts and benefits upon our Harbor Island-based business and operations.

Founded by Fred R. Smith in 1949, SSA began its first cargo handling operations in a small corner of Washington State. Driven by a pioneering spirit, our company saw steady growth over the years, expanding up and down the West Coast to operate a significant market share of the major international terminals in the eastern Pacific. Today, SSA has become a global enterprise spanning more than 250 locations across five continents. From our corporate headquarters on Harbor Island, SSA continues to broaden our reach by developing new locations and upgrading existing facilities, providing some of the most technologically advanced logistics facilities in the world.

SSA Marine, Tideworks Technology and Rail Management Services are headquartered within a corporate campus of three building facilities on South Harbor Island. Two of these are Company-owned facilities, and the third is within leased space within the Harbor Marina Corporate Center, which is owned and operated by the Port of Seattle. Our systems are integrated to provide effective collaboration and support our global network of customers, marine terminals, port authorities, vendors and employees. Our South Harbor Island campus hosts direct operational oversight and support for marine operations throughout the Seattle Metropolitan Area, including Terminal 5, Terminal 18, Terminal 30 and Terminal 91, each of which are connected by a network of marine-, rail- and road-based logistics providers. 340 employees work at our headquarters complex and an additional approximately 125 non-longshore staff are located at the terminals. As a comprehensive network of affiliated systems, impacts to any portion of the corporate campus adversely affect the entire headquarters ecosystem. As such, SSA offers the following comments concerning the Duwamish Segment of the WSBLE:

**SSA's preferred alternative is the South Edge Crossing Alignment Option (DUW-1b)**, which we support strongly as the only alternative yielding a feasible solution that compared to DUW-1a and DUW-2 is least impactful to our terminal and administrative Harbor Island operations. This option still requires relocation of our headquarters campus as maintaining our office functions between the West Seattle Bridge and WSBLE would no longer be feasible. Supporting this position:

- South Crossing Alternative (DUW-1a)
  - The DUW-1a alignment directly impacts two of the three office buildings (one owned and one leased) of our South Harbor Island corporate headquarters and will make continued use of our corporate campus impossible. Loss of these assets undermine the interconnected function of our comprehensive campus as described above. Loss of our corporate campus, and its connectivity to our marine terminal operations will require mitigation and functional relocation.
  - The construction of DUW-1a will also disrupt terminal operations north of the alignment.
- North Crossing Alternative (DUW-2)
  - Regarding the 5-leg intersection (Chelan AVE SW/W Marginal Way SW/SW Spokane ST/Delridge Way SW): Any closure of Chelan AVE SW west of W Marginal Way SW/SW Spokane ST is understood to impact the 5-leg intersection operation. This is a critical intersection for SSA's Harbor Island marine terminal operations and corporate campus access/egress.
  - Chelan AVE SW lane closure-related mitigation measures are not sufficient or acceptable for the vehicle volumes at this area. Terminal 18 parking lot impacts have the potential to affect overall terminal operations.
  - Please identify navigation impacts to shoreside businesses from DUW-2.
  - Because of the critical function of our Terminal 5 and Terminal 18 marine terminal gates where high-volume, safe and efficient truck operations require direct and continuous unencumbered access to/from the roadway network, SSA believes that the North Crossing Alternative (DUW-2) impacts cannot be operationally mitigated. Terminal access is affected by construction of columns, or piers, of the elevated structure.
- Multi-year Construction Period:
  - With the anticipated duration, access impediments, parking impacts and disruption due to construction of the South Edge Crossing Alignment Option (DUW-1b), relocation of SSA corporate campus functions and staff will be required to ensure a safe and uninterrupted work environment.
  - Potential impacts during construction should recognize the relationship and impacts to water-dependent uses, including marine terminals and associated truck logistics, rail logistics, transloading and warehousing land uses.
  - Particularly problematic are the expected construction-related impacts adversely impacting international container cargo operations that significantly contribute to truck and other traffic in the already congested Spokane ST corridor. Of the options, the south Edge Crossing Alignment Option (DUW-1b) will be the least disruptive to container cargo and related operations.
  - DEIS Section "3.5.1.2 Intersection Operations" states "In the SODO and Duwamish segments, all study intersections operate at LOS D or better during both the a.m. and p.m. peak periods, although higher vehicle delays can be experienced from nearby port and terminal operations near the East Marginal Way and South Spokane Street intersection." This is a critical comment that illustrates the fragile state of intersection operations, which our marine terminals depend upon, and the potential for impacts related to project construction.
  - Please note even short-term weekday, weekend and night closures can have a significant impact on freight mobility and marine terminal operations.
- Surface Transportation
  - Continuous, uninterrupted access of the BNSF railway to the Terminal 5 on-dock rail yard is absolutely critical to our operations. Any disruptions to BNSF service, including the rail trestle,

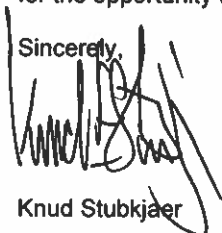


sidings, switching operations, and/or support track is considered detrimental to Terminal 5's operation.

- Please evaluate all potential truck detour routes in detail, as they could create unreasonable burdens for truck drivers servicing our marine terminals.
- Freight mobility and access impacts create a compounding negative effect on marine terminal operations. Trucks within the critical and congested Duwamish Crossing segment area have limited route options and may be impacted differently than pedestrian, bicycle, and personal automobile modes.
  - Mitigating these traffic impacts, a robust traffic management plan should be developed (with stakeholder input) and published well in advance of project start so that SSA can collectively plan for project-related mobility impacts.

SSA understands the value of efficient and reliable transportation networks, and truly appreciates the transformative potential the West Seattle and Ballard Link Extensions will have on Seattle and the working waterfront. Thank you again for the opportunity to comment on the DEIS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Knud Stubkjaer', written over a vertical line.

Knud Stubkjaer

Chief Executive Officer  
SSA Marine

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 505089 - SSA Marine Draft EIS Comment**

#	Comments	Responses
1	<p>SSA's preferred alternative is the South Edge Crossing Alignment Option (DUW-1b), which we support strongly as the only alternative yielding a feasible solution that compared to DUW-1a and DUW-2 is least impactful to our terminal and administrative Harbor Island operations. This option still requires relocation of our headquarters campus as maintaining our office functions between the West Seattle Bridge and WSBLE would no longer be feasible. Supporting this position:</p> <ul style="list-style-type: none"> <li>• South Crossing Alternative (DUW-1a) The DUW-1a alignment directly impacts two of the three office buildings (one owned and one leased) of our South Harbor Island corporate headquarters and will make continued use of our corporate campus impossible. Loss of these assets undermine the interconnected function of our comprehensive campus as described above. loss of our corporate campus, and its connectivity to our marine terminal operations will require mitigation and functional relocation. The construction of DUW-1a will also disrupt terminal operations north of the alignment.</li> <li>• North Crossing Alternative (DUW-2) • Regarding the 5-leg intersection (Chelan AVE SW/W Marginal Way SW/SW Spokane ST/Delridge Way SW): Any closure of Chelan AVE SW west of W Marginal Way SW/SW Spokane ST is understood to impact the 5-leg intersection operation. This is a critical intersection for SSA's Harbor Island marine terminal operations and corporate campus access/egress.</li> <li>• Chelan AVE SW lane closure-related mitigation measures are not sufficient or acceptable for the vehicle volumes at this area. Terminal 18 parking lot impacts have the potential to affect overall terminal operations.</li> <li>• Please identify navigation impacts to shoreside businesses from DUW-2.</li> <li>• Because of the critical function of our Terminal 5 and Terminal 18 marine terminal gates where high volume, safe and efficient truck operations require direct and continuous unencumbered access to/from the roadway network, SSA believes that the North Crossing Alternative (DUW-2) impacts cannot be operationally mitigated. Terminal access is affected by construction of columns, or piers, of the elevated structure.</li> <li>• Multi-year Construction Period:</li> <li>• With the anticipated duration, access impediments, parking impacts and disruption due to construction of the South Edge Crossing Alignment Option (DUW-1b), relocation of SSA corporate campus functions and staff will be required to ensure a safe and uninterrupted work environment.</li> <li>• Potential impacts during construction should recognize the relationship and impacts to water-dependent uses, including marine terminals and associated truck logistics, rail logistics, transloading and warehousing land uses.</li> <li>• Particularly problematic are the expected construction- related impacts adversely impacting international container cargo operations that significantly contribute to truck and other traffic in the already congested Spokane ST corridor. Of the options, the south Edge Crossing Alignment Option (DUW-1b) will be the least disruptive to container cargo and related operations.</li> <li>• DEIS Section "3.5.1.2 Intersection Operations states "In the SODO and Duwamish segments, all study intersections operate at LOS Dor better during both the a.m. and p.m. peak periods, although higher vehicle delays can be experienced from nearby port and terminal operations near the East Marginal Way and South Spokane Street intersection." This is a critical comment that illustrates the fragile state of intersection operations, which our marine terminals depend upon, and the potential for impacts related to project construction.</li> <li>• Please note even short-term weekday, weekend and night closures can have a significant impact on freight mobility and marine terminal operations.</li> <li>• Surface Transportation • Continuous, uninterrupted access of the BNSF railway to the Terminal 5 on-dock rail yard is absolutely critical to our operations. Any disruptions to BNSF service, including the</li> </ul>	<p>Please see responses to CCG2 and CC4.1a in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS. Information about transportation impacts on freight mobility is provided in Section 3.10, Affected Environment and Impacts during Operation—Freight Mobility and Access, and Section 3.11, Construction Impacts, of the Final EIS. Section 3.11 also discusses potential navigational impacts during construction that could affect businesses with vessels that transit this area. Information about water-dependent businesses affected by each Duwamish Segment alternative is provided in Section 4.3, Economics, of the Final EIS. Impacts to water-dependent businesses are also discussed in Section 6.5, Significant and Unavoidable Adverse Impacts, of the Final EIS. Additional information about regional economic impacts from Alternative DUW-2 has also been added to Section 4.3.</p>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

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#	Comments	Responses
	<p>rail trestle, sidings, switching operations, and/or support track is considered detrimental to Terminal 5's operation. • Please evaluate all potential truck detour routes in detail, as they could create unreasonable burdens for truck drivers servicing our marine terminals. • Freight mobility and access impacts create a compounding negative effect on marine terminal operations. Trucks within the critical and congested Duwamish Crossing segment area have limited route options and may be impacted differently than pedestrian, bicycle, and personal automobile modes. • Mitigating these traffic impacts, a robust traffic management plan should be developed (with stakeholder input) and published well in advance of project start so that SSA can collectively plan for project-related mobility impacts.</p>	

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## Sound Transit Projects - Communications (1 Total)

**Search Term**

504467

**Communication ID: 504467 - Jeff Wilson Draft EIS Comment**

**Communication** ( 4/28/2022 )

Jeff Wilson Draft EIS Comment

Greetings,

I represent the The Grove West Seattle Inn located at 3512 SW Alaska St. very near the potential Avalon station and Triangle redevelopment. We are excited about the prospects of having a station so close to our Hotel and believe our guests would benefit substantially from the service and also utilize it frequently. As an anchor business in this neighborhood we are concerned there are current oversights in the DEIS that would create unintended consequences if not addressed in the Final EIS; especially the troubling impacts of preferred alternative WSJ-1 in terms of both general transportation disruption and resulting displacement of neighborhood businesses as well as aesthetic, noise, vibration and neighborhood cohesion impacts. WSJ-1's guideway would literally and figuratively cast a dark shadow over this transformative neighborhood.

Of the preferred alternatives, we believe tunnel alternative WSJ-3a should be advanced with modifications as the final preferred alternative. WSJ-3a reduces the issues with neighborhood cohesion and displacement compared to the above-grade alternatives, and the future station option on 41st Avenue SW is a better location compared to 42nd Avenue SW as it will have less impact on existing established businesses in the heart of the Junction during construction.

We further believe the DEIS currently represents inadequate study of cumulative impacts, and provides insufficient mitigation information, in several areas including the lack of sufficient information on cumulative impacts of transportation and road closures -- including paths of temporary and permanent-term closures and re-routes -- as well as the lack of sufficient information on separate and cumulative impacts of tunnel routes on the businesses and residents above them.

Thank you for considering these comments.

Jeff Wilson, General Manager

The Grove West Seattle Inn

**Owner(s):**

Contact ID	Name	Type	Phones	Email
<a href="#">1079354</a>	<a href="#">Jeff Wilson</a>	Individual		<a href="mailto:jwilson@grovewestseattle.com">jwilson@grovewestseattle.com</a>

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504467 – The Grove Draft EIS Comment**

#	Comments	Responses
1	We are excited about the prospects of having a station so close to our Hotel and believe our guests would benefit substantially from the service and also utilize it frequently.	Thank you for expressing support for the West Seattle Link Extension.
2	As an anchor business in this neighborhood we are concerned there are current oversights in the DEIS that would create unintended consequences if not addressed in the Final EIS; especially the troubling impacts of preferred alternative WSJ-1 in terms of both general transportation disruption and resulting displacement of neighborhood businesses as well as aesthetic, noise, vibration and neighborhood cohesion impacts. WSJ-1's guideway would literally and figuratively cast a dark shadow over this transformative neighborhood. Of the preferred alternatives, we believe tunnel alternative WSJ-3a should be advanced with modifications as the final preferred alternative. WSJ- 3a reduces the issues with neighborhood cohesion and displacement compared to the above-grade alternatives, and the future station option on 41st Avenue SW is a better location compared to 42nd Avenue SW as it will have less impact on existing established businesses in the heart of the Junction during construction.	Please see responses to CCG2, CC4.4a, CC4.5a, and 4.7a in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS.
3	We further believe the DEIS currently represents inadequate study of cumulative impacts, and provides insufficient mitigation information, in several areas including the lack of sufficient information on cumulative impacts of transportation and road closures -- including paths of temporary and permanent-term closures and re-routes -- as well as the lack of sufficient information on separate and cumulative impacts of tunnel routes on the businesses and residents above them	Chapter 5, Cumulative Impacts, of the Final EIS describes potential cumulative long-term and short-term transportation and other impacts of the West Seattle Link Extension Project in conjunction with past, present, and reasonably foreseeable future actions. Direct and indirect impacts of the project, such as road closures and impacts to businesses and residences, as well as mitigation measures, are discussed in Chapter 3, Transportation Environment and Consequences, or Chapter 4, Affected Environment and Environmental Consequences, of the Final EIS. Please see responses to CC3c and CC5a in Table 7-1 in Chapter 7.



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)



## Appendix O. Draft EIS Comment Summary and Response to Comments

### Communication ID: 504303 - Washington Maritime Federation Draft EIS Comment

#	Comments	Responses
1	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.	Impacts to water-dependent businesses were discussed in Sections 4.2.3 and 4.3.3 of the WSBLE Draft EIS. Additional information regarding impacts on maritime trade and manufacturing has been added to Section 4.3, Economics, in the West Seattle Link Extension Final EIS. A response to this comment related to the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.
2	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.	Additional discussion of impacts on freight mobility in the SODO Segment has been added to Section 3.10, Affected Environment and Impacts during Operation—Freight Mobility and Access, and Section 3.11, Construction Impacts, of the Final EIS. Discussion of cumulative effects to both Manufacturing and Industrials Centers has been added to Chapter 5, Cumulative Impacts. A response to this comment related to the Ballard Link Extension will be provided as part of the environmental review process for the Ballard Link Extension.
3	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.	Please see responses to CCG2, CC4.3c, CC4.9b, and CC4.17a in Table 7-1. The analysis of Preferred Alternative DUW-1a has been updated in the Final EIS based on additional design work and coordination with permitting agencies, and the design no longer includes bridge column in the West Waterway. Please see Section 3.10, Affected Environment and Impacts during Operation—Freight Mobility and Access, and Section 3.11, Construction Impacts, for more information on potential impacts to freight operations.
4	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 15th Avenue Station Option (IBB-2b) as the preferred alternative. The DEIS details that the current Preferred Elevated 14th 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	A response to this comment will be provided as part of the environmental review process for the Ballard Link Extension.

**Appendix O. Draft EIS Comment Summary and Response to Comments**

#	Comments	Responses
	<p>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 15th 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.</p>	



April 28, 2022

WSBLE Draft EIS Comments c/o Lauren Swift  
Sound Transit  
401 S Jackson St  
Seattle WA 98104

Via email: [WSBLEDEIScomments@SoundTransit.org](mailto:WSBLEDEIScomments@SoundTransit.org)

Re: West Seattle and Ballard Link Extensions Draft EIS Comments

On behalf the West Seattle Chamber of Commerce, thank you for the opportunity to provide comment on the Sound Transit West Seattle Ballard Link Extensions (WSBLE) Draft Environmental Impact Statement (DEIS). We appreciate Sound Transit's direct engagement with the West Seattle Chamber in presenting at several of our recent virtual luncheons for our members.

The West Seattle Chamber is known for its support of our community and members. We represent over 200 businesses from every corner of the West Seattle peninsula. From keeping the West Seattle community informed about impactful issues and advocating on our members' behalf with local government to providing regular educational opportunities and picking up trash, the Chamber is focused on serving the West Seattle community and Chamber members.

The dual challenges of the COVID pandemic and closure of the West Seattle bridge have hit our community especially hard over the last two years and will undoubtedly take time for us to recover. The traffic challenges resulting from the sudden and prolonged bridge closure have proven the critical lifeline in having resilient transportation options on and off the West Seattle peninsula. While we look forward to the eventual addition of Sound Transit's West Seattle link extension, how the transit line is built could present another economic disaster for our small business community.

We recognize the magnitude of this project and how many different stakeholders and communities that Sound Transit will be required to engage over the life of the WSBLE development and construction. However, the transportation agency must find a better and more consistent approach in engaging the small business community, especially with respect to those businesses that do not own their spaces and have any likelihood of being impacted by any of the alternatives. While Sound Transit enjoys many legal protections in what guides the engagement process, especially with respect to the taking of property, moving forward, we expect the agency to go beyond those perimeters and invest significantly more time and effort into engaging the West Seattle small business community. If it is a matter of staff resources to

adequately respond to this vital request, we expect that to be addressed at a priority level with the Sound Transit board if necessary.

Given we have members that could be impacted by each of the options, we do not intend to take a position on any specific alternative. However, we implore Sound Transit to provide better ways to engage all business owners – landowners and renters alike – with how the project may impact their business' future so that they can each plan for their own futures as best as possible. Our members need simple ways to connect to the process throughout the remainder of the development stage of WSBLE and especially when it comes time for decisions around construction planning. We understand that there will be lengthy construction impacts from the project and expect that Sound Transit will appropriately recognize and address how those periods can be detrimental to a business' future, including compensating each impacted business accordingly.

We look forward to working closely with Sound Transit in the years to come to bring light rail to our West Seattle community in an equitable and considerate way.

Sincerely,

**Dawn Leverett**

*Board Chair*

West Seattle Chamber of Commerce

**Whitney Moore**

*Executive Director*

West Seattle Chamber of Commerce

**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504361 - West Seattle Chamber of Commerce Draft EIS Comment**

#	Comments	Responses
1	<p>The dual challenges of the COVID pandemic and closure of the West Seattle bridge have hit our community especially hard over the last two years and will undoubtedly take time for us to recover. The traffic challenges resulting from the sudden and prolonged bridge closure have proven the critical lifeline in having resilient transportation options on and off the West Seattle peninsula. While we look forward to the eventual addition of Sound Transit's West Seattle link extension, how the transit line is built could present another economic disaster for our small business community. We recognize the magnitude of this project and how many different stakeholders and communities that Sound Transit will be required to engage over the life of the WSBLE development and construction. However, the transportation agency must find a better and more consistent approach in engaging the small business community, especially with respect to those businesses that do not own their spaces and have any likelihood of being impacted by any of the alternatives. While Sound Transit enjoys many legal protections in what guides the engagement process, especially with respect to the taking of property, moving forward, we expect the agency to go beyond those perimeters and invest significantly more time and effort into engaging the West Seattle small business community. If it is a matter of staff resources to adequately respond to this vital request, we expect that to be addressed at a priority level with the Sound Transit board if necessary. Given we have members that could be impacted by each of the options, we do not intend to take a position on any specific alternative. However, we implore Sound Transit to provide better ways to engage all business owners – landowners and renters alike – with how the project may impact their business' future so that they can each plan for their own futures as best as possible. Our members need simple ways to connect to the process throughout the remainder of the development stage of WSBLE and especially when it comes time for decisions around construction planning. We understand that there will be lengthy construction impacts from the project and expect that Sound Transit will appropriately recognize and address how those periods can be detrimental to a business' future, including compensating each impacted business accordingly.</p>	<p>Please see Appendix F, Public Involvement, Tribal Consultation, and Agency Coordination, of the West Seattle Link Extension Final EIS for information on the outreach and coordination activities conducted in during development of the WSBLE Draft EIS and Final EIS for the West Seattle Link Extension Project. Sound Transit will continue to coordinate with affected business owners throughout the final design and construction phases.</p>

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April 22, 2022

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

Dear Ms. Swift,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the West Seattle to Ballard Link Extension (WSBLE) Project. This project will be the largest light rail project that Seattle is likely to ever experience. The effects of construction will last over a decade, but more importantly the project built will affect Seattle for hundreds of years.

The West Seattle Junction Association has long represented the businesses of the West Seattle Junction and has advocated for the community. The West Seattle Junction Association is a non-profit which produces many community events throughout the year including Art Walk, Summer Fest, Outdoor Movies, and many more events. We also maintain and beautify conditions at the Junction.

We are writing to express our opinions about the options for light rail at the West Seattle Junction. As you may know the West Seattle Junction has been one of the fastest growing neighborhoods in Seattle over the last decade with considerable residential growth and more planned or under construction. It is critical that light rail works with this development and the character of the Junction and not against it.

Two of the alternatives are clearly not acceptable to West Seattle residents. Sound Transit board preferred alignment WSJ-1 ending at 41<sup>st</sup>/42<sup>nd</sup> would take out a wide swath of single family homes and small businesses to reach the Junction. Not only would those homes be lost, but much of the pathway would be rendered undevelopable in an area with some of the best transit connections in the city. And an unattractive tail track would continue into the surrounding neighborhood for many years to come. This option is counterproductive to building good developments along light rail.

Although the second alignment- WSJ-2 avoids as much property takes, it is even worse for the people who live and work in the Junction. The location on Fauntleroy or at 38<sup>th</sup> is simply too far from the heart of the Junction at California to be useful. There is a steep hill between the proposed station location and California. We believe the walkshed would be limited for this station and it would serve businesses and residents poorly. The station would be also too close to the Avalon Station so its benefits would be limited. If the Avalon Station was eliminated for cost cutting measures, this single West Seattle Junction station location would be poorly located to serve both the Junction and homes and residents along Avalon.

The West Seattle Junction Association strongly supports a tunnel option for light rail into the Junction. We believe that this is the best solution for this increasingly growing neighborhood and business district. The tunnel options that end at either 41<sup>st</sup> or 42<sup>nd</sup> (WSJ-3a, WSJ-3b, and WSJ-5) all offer station locations that serve the Junction far better than the elevated options without taking wide swaths of the neighborhood for unsightly tracks. Tunnel options would also allow the tail tracks to be located underground instead of hanging over the neighborhood for many years. This would also make future extension to the Morgan Junction and further south much easier to accomplish without considerable property displacement.

We appreciate the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the West Seattle to Ballard Link Extension (WSBLE) Project. If you wish to follow up, please contact our Executive Director, Chris Mackay, at [chris@wsjunction.org](mailto:chris@wsjunction.org) or (206) 935-0904.

Thank you for your consideration,

The Board of the West Seattle Junction Association



**Appendix O. Draft EIS Comment Summary and Response to Comments**

**Communication ID: 504795 - West Seattle Junction Association Draft EIS Comment**

#	Comments	Responses
1	<p>Two of the alternatives are clearly not acceptable to West Seattle residents. Sound Transit board preferred alignment WSJ-1 ending at 41st/42nd would take out a wide swath of single family homes and small businesses to reach the Junction. Not only would those homes be lost, but much of the pathway would be rendered undevelopable in an area with some of the best transit connections in the city. And an unattractive tail track would continue into the surrounding neighborhood for many years to come. This option is counterproductive to building good developments along light rail.</p> <p>Although the second alignment- WSJ-2 avoids as much property takes, it is even worse for the people who live and work in the Junction. The location on Fauntleroy or at 38th is simply too far from the heart of the Junction at California to be useful. There is a steep hill between the proposed station location and California. We believe the walkshed would be limited for this station and it would serve businesses and residents poorly. The station would be also too close to the Avalon Station so its benefits would be limited. If the Avalon Station was eliminated for cost cutting measures, this single West Seattle Junction station location would be poorly located to serve both the Junction and homes and residents along Avalon. The West Seattle Junction Association strongly supports a tunnel option for light rail into the Junction. We believe that this is the best solution for this increasingly growing neighborhood and business district. The tunnel options that end at either 41st or 42nd (WSJ-3a, WSJ-3b, and WSJ-5) all offer station locations that serve the Junction far better than the elevated options without taking wide swaths of the neighborhood for unsightly tracks. Tunnel options would also allow the tail tracks to be located underground instead of hanging over the neighborhood for many years. This would also make future extension to the Morgan Junction and further south much easier to accomplish without considerable property displacement.</p>	<p>Please see response to CCG2 in Table 7-1 in Chapter 7, Comment Summary, of the West Seattle Link Extension Final EIS.</p>

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