

Appendix B

Government Entity Comments

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REGION 10

SEATTLE, WA 98101

December 5, 2024

Erin Littauer, Environmental Protection Specialist
Federal Transit Administration
915 Second Ave., Suite 3192
Seattle, Washington 98174

Lauren Swift, Central Corridor Environmental Manager
Sound Transit
401 Jackson Street
Seattle, Washington 98104

Dear Erin Littauer and Lauren Swift:

Thank you for the Federal Transit Administration's October 24, 2024 letter inviting the U.S. Environmental Protection Agency to engage in the National Environmental Policy Act environmental review process as a participating agency for the Ballard Link Extension Project (BLE) (EPA Project Number 24-0061-FTA) located in the City of Seattle, King County, Washington. The EPA accepts FTA's invitation to participate as a participating agency. Furthermore, the EPA has reviewed FTA's October 24, 2024 Notice of Intent to prepare an environmental impact statement for the BLE Project. The EPA has conducted its review pursuant to the NEPA and our review authority under section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA and requires the EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The proposed BLE Project would extend existing light rail service along a 7.7-mile corridor through downtown Seattle, from SODO to Ballard, and include a new 3.3-mile light rail-only tunnel from south of the Chinatown-International District to South Lake Union and Seattle Center/Uptown. The BLE Project was previously included in the West Seattle and Ballard Link Extensions Project and Draft EIS in 2022. Since then, Sound Transit and FTA decided to conduct separate environmental reviews for each extension, as they will operate as separate lines with independent utility. Because the environmental review processes are now separate, Sound Transit is preparing a State Environmental Policy Act Supplemental Draft EIS for BLE. This scoping comment period is intended to collect feedback on the Purpose and Need, alternatives, and potential topics to be studied in the BLE DEIS.

The EPA is supportive of the Project's goals to improve regional mobility, including expanding service to transit-dependent residents and low-income populations. The EPA also supports goals to provide

regional transit while minimizing adverse impacts on the environment through sustainable practices. The EPA provided scoping comments in April 2019 and DEIS comments in April 2022 for the combined West Seattle and Ballard Link Extensions Project and recommends the FTA and Sound Transit consider EPA's previous comments for the BLE DEIS, as appropriate. The EPA offers the enclosed additional scoping comments on several other and related topics that are important to consider in the DEIS for this project.

Please note that our status as a participating agency has no effect on our authorities under Section 102(2)(c) of the NEPA or Section 309 of the Clean Air Act. Our role as a participating agency does not imply that the EPA will necessarily concur with all aspects of the NEPA documentation. Contingent on agency resources, the EPA agrees to provide preliminary agency feedback on areas in which we have expertise. We will provide early engagement in the NEPA process, participate in coordination meetings, and conduct timely reviews of documents provided for our agency's input during the environmental review process. We particularly appreciate involvement opportunities during transportation planning stages, as well as during development stages of the NEPA document. These early stages provide opportunities to identify important resource issues and to achieve maximum avoidance of environmental impacts.

Thank you for the opportunity to be a participating agency and provide scoping comments for this project. We look forward to working with you during development of the project. If you have questions about this review, or to discuss the EPA participation, please contact Ariana Monroy of my staff at 206-553-2120 or at monroy.ariana@epa.gov, or me, at 206-553-2117 or at sturges.susan@epa.gov.

Sincerely,

**SUSAN
STURGES**  Digitally signed by
SUSAN STURGES
Date: 2024.12.05
12:44:27 -08'00'

Susan Sturges, Acting Manager
NEPA Branch

Enclosure

**U.S. EPA Detailed Comments on the
Ballard Link Extension Scoping Notice
King County, Washington
December 2024**

Alternatives

The NOI identifies build alternatives in the project corridor; all alternatives propose a tunnel from SODO to South Lake Union before transitioning to elevated or retained cut configurations through Interbay. From the Interbay station, alternatives transition to cross Salmon Bay in a tunnel, a high-level fixed bridge, or a movable bridge. Station options in Ballard include elevated and tunnel stations. The project information website identifies a Preferred Alternative that includes a tunnel through Salmon Bay.¹ This Preferred Alternative is in alignment with the EPA’s previous recommendations made in 2022.² We appreciate that this Preferred Alternative addresses some of the EPA’s previous concerns, such as potential impacts to maritime cargo transportation (that could impact critical services to rural and Alaska Native village communities), maritime business displacements, reduction of residential displacements, in-water effects (including aquatic resources), and channel navigation impacts.

Hazardous Materials and Contaminated Sites

As described in our 2019 scoping letter, Salmon Bay hosts a patchwork of sediment contamination to consider and characterize for any in-water and/or shoreline construction activities. We recommend the DEIS identify potential impacts associated with the alternatives, including to hydrology, water quality, sediments, and biota. Identify sediment remediation activities to isolate contamination in-situ and construction best management practices to reduce potential for contamination of surface water, ground water, and sediments.

Aquatic Resources

As described in our 2019 scoping letter, we recommend the DEIS describe and address all potentially affected aquatic resources under the identified alternatives, including surface water and ground water quality and quantity, hydrology, and sensitive aquatic areas. Evaluate impacts in terms of the aerial (acreage) or linear extent to be impacted and by the functions they perform. Address stormwater runoff (including pollutant transport), including use of Low Impact Development strategies, effects to waters listed as impaired under Clean Water Act § 303(d), and compliance with other Clean Water Act requirements and implementing regulations, such as those for Total Maximum Daily Loads, CWA § 404 permits, and anti-degradation.

CWA § 404

CWA § 404 requires permits from the U.S. Army Corps of Engineers (Corps) for the discharge of dredged or fill material into Waters of the United States (WOTUS). Compliance with the CWA § 404(b)(1) Guidelines³ must be demonstrated before proposed discharges of dredged or fill material may be authorized by the Corps. To authorize the discharge of dredged or fill material into WOTUS, the

¹<https://ballardlink.participate.online/#alternatives>. Accessed 11/26/2024.

² EPA NEPA comment letter dated April 28, 2022 on FTA and Sound Transit’s January 2022 DEIS for the West Seattle and Ballard Link Extensions (CEQ Number 20220008).

³ 40 C.F.R. § 230.

Corps must make written factual determinations of the potential short-term or long-term effects of a proposed discharge on the physical, chemical, and biological components of the aquatic environment. Because the Corps' authorization will also require a NEPA analysis, the EPA recommends close coordination with the Corps to ensure this NEPA analysis aligns with their permitting process and requirements. The EPA provides below an overview of two important requirements, identification of the Least Environmental Damaging and Practicable Alternative (LEDPA) and mitigation sequencing.

LEDPA

The Guidelines require that no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge, that meets the project purpose, which has less adverse impacts on the aquatic ecosystem.⁴ The Corps is, therefore, only able to issue a permit for the LEDPA.⁵ Identification of the LEDPA is achieved by performing an alternatives analysis that evaluates the direct, secondary or indirect, and cumulative impacts to jurisdictional WOTUS resulting from each alternative considered. An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of the overall project purposes.⁶

Mitigation Sequence

Demonstrating compliance with the Guidelines necessitates identifying and implementing appropriate steps to avoid, minimize, and compensate for any remaining unavoidable impacts to WOTUS.⁷ These steps form a mandatory mitigation sequence that must be followed in order, and no step may be substituted for another. Appropriate and practicable steps used to avoid, minimize, and then compensate for any unavoidable impacts to WOTUS must be outlined prior to issuance of a CWA Section 404 permit, in accordance with both the Guidelines and the 1990 Memorandum of Agreement regarding Mitigation between the EPA and the Department of Army.⁸

The Guidelines require that compensation be provided if it is practicable to provide.⁹ Multiple factors cause the EPA to presumptively consider compensation as practicable. Depending upon the WOTUS impact that needs compensatory mitigation, the project location may be within the service areas of an approved mitigation bank or an in-lieu fee program. Permittee-responsible compensation is another option to offset unavoidable aquatic resource impacts. If permittee-responsible compensation is considered, it is preferable to be located within one of the watersheds where impacts would occur and could entail making improvements to existing infrastructure (e.g., replacing a stream crossing).

Environmental Justice (EJ)

Our 2022 NEPA comment letter recommended the NEPA analysis incorporate feedback from affected Tribes when making decision regarding the project. We continue to recommend the DEIS describe issues raised during government-to-government consultations and how those issues were addressed. Additionally, we recommend the NEPA analysis consider potential impacts to communities with EJ

⁴ 40 C.F.R. § 230(a).

⁵ Provided that it complies with other portions of the Guidelines.

⁶ 40 C.F.R. § 230.10(a)(2).

⁷ 40 C.F.R. § 230.10(d).

⁸ 40 C.F.R. § 230.10(d).

⁹ 40 C.F.R. § 230.93(f)(1).

concerns, including addressing the potential displacement and relocation of impacted communities and vulnerable local businesses, including minority-owned.

The EPA notes that subsequent to our 2022 letter, CEQ issued its Phase II NEPA regulations.¹⁰ One key recommendation includes discussing, as part of the environmental consequences, the potential for disproportionate and adverse human health and environmental effects on communities with EJ concerns. Also, E.O. 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All*, published April 26, 2023, directs federal agencies, as appropriate and consistent with applicable law: to identify, analyze, and address disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with EJ concerns. Section 3 (b)(i) of E.O. 14096 also directs the EPA to assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with EJ concerns when carrying out responsibilities under Section 309 of the Clean Air Act, 42 U.S.C. 7609. In light of recent federal guidance, the EPA recommends the DEIS identify potential impacts to communities with EJ concerns and consider mitigation measures and opportunities for effective and meaningful public engagement.¹¹

The EPA notes that EJScreen, the EPA's nationally consistent EJ screening and mapping tool, was recently updated (version 2.3). We recommend the DEIS consider updated data on local communities. In addition, the EPA recommends identifying transient users of the project area to identify potential EJ concerns, consistent with Promising Practices for EJ Methodologies in NEPA reviews, which states that agencies can be informed by determining if any minority or low-income transient populations (e.g., Tribes, indigenous populations) may be affected (e.g., may reside elsewhere but come within the affected area for subsistence fishing or to collect traditional medicines) by the project.

Air Quality

The EPA recommends the DEIS discuss air quality impacts from project construction, maintenance, and operations with respect to criteria air pollutants and air toxics. Also discuss the direct, indirect, and cumulative impacts of project related air emissions (e.g., potential downwind air quality impacts). Disclose current representative background criteria air pollutant concentrations in the project area, compared to state and federal ambient air quality standards and disclose any other air quality regulations and requirements related to the project. We recommend coordinating with Washington Department of Ecology to ensure federal and state air quality standards will be met. Please note that on May 6, 2024, the EPA revised the primary annual PM_{2.5} standard by lowering the level from 12.0 µg/m³ to 9.0 µg/m³.

The EPA recommends the DEIS address potential air quality impacts during the construction period to reduce construction emissions, including fugitive dust. For example:

- Consider stabilizing open storage piles and disturbed areas by covering or applying water, chemical, or organic dust palliative where appropriate.

¹⁰ CEQ Phase II NEPA regulations, May 2024. 40 CFR 1502.16

¹¹ https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf. Accessed 11/27/2024.

- Consider wind fencing and phase grading operations where appropriate.
- Consider a construction traffic and parking management plan that maintains traffic flow.
- Identify sensitive receptors in the project area, such as daycare centers, schools, nursing homes, hospitals, and other health-care facilities, and minimize impacts to these populations.
- Utilize cleanest available fuel engines in construction equipment and consider opportunities for the reduction of idling emissions or electric-powered construction equipment.

Green Infrastructure

The proposed project includes new infrastructure construction, which provides an opportunity to design features that utilize green construction techniques and reduce waste. The EPA encourages the implementation of infrastructure to improve energy efficiency, minimize embodied carbon by sourcing sustainable materials, prepare for net-zero operations, and reduce stormwater runoff in onsite stormwater management features.¹²

Climate Change

Recent CEQ regulations¹³ recommend agencies discuss reasonably foreseeable climate-change related effects, including the quantification of greenhouse gas emissions where feasible; relevant risk reduction, resiliency, or adaptation measures; and the analysis of any adverse environmental effects of the no action alternative. The EPA encourages project planning to consider ongoing and projected regional and local climate change and ensure robust climate resilience/adaptation planning in the project design. Evidence indicates that climate change alters the intensity, frequency and duration of some natural hazards (e.g., extreme temperatures, storms, flooding). Traditional safety features and design standards may be incongruent with current and anticipated conditions.

Furthermore, the EPA recommends the DEIS discuss reasonably foreseeable direct and indirect greenhouse gas emissions that will result from proposed construction, operations, and maintenance activities. Estimated emissions can serve as a useful proxy for assessing relative effects, comparing alternatives, and supporting the need for practicable mitigation to reduce impacts.

¹² <https://www.epa.gov/green-infrastructure>. Accessed 11/26/2024.

¹³ CEQ Phase II NEPA regulations, May 2024. 40 CFR 1500.16.

Sound Transit Projects - Communications (1 Total)

Search Term

556636

Communication ID: 556636 - Carrie Staley Court Reporter BLE Scoping comment

Communication (11/7/2024)

Carrie Staley Court Reporter BLE Scoping comment

I'm the reentry center administrator for the Department of Corrections. The Department of Corrections leases the building at 410 4th Avenue and has been a residential reentry center, formerly known as a work release, since 1978, and we plan to remain at the site for as long as possible. We refer to the site as Reynolds Reentry Center. To date there have been 10,089 people who have had the opportunity to transition from prison to the King County community since the location has been cited for use as a reentry center. A 2007 Washington State Institute for Public Policy study found a lower recidivism rate for people who have a reentry path by progressing from prison through a reentry center on their pathway home at a 2.8 percent rate.

At the time of this study, the return on investment was \$3.82 of benefit per dollar of cost, which stemmed from the future benefits to taxpayers and crime victims from reduced recidivism. We are obligated to provide safe and humane physical plants to incarcerated individuals including kitchen facilities. We also need programming space for residents, office space, et cetera. This is a 24/7 facility with staff onsite and includes 120 beds over six housing unit floors as well as common spaces. This site also employs 36 state staff. RCW 72.65.220 covers the facility citing process for reentry centers and includes public hearings and notifications. The last attempt to expand beds in King County in 2019 was unsuccessful in citing after many, many attempts.

The residents at Reynolds Reentry Center are minimum security status incarcerated individuals who have worked through behavioral concerns, programming needs, substance use treatment in order to transition home through a reentry center and provide them a better opportunity for a successful reintegration. The loss of this site at 410 4th Avenue for returning citizens would be devastating.

Owner(s):

Contact ID	Name	Type	Phones	Email
1110786	Carrie Stanley	Individual	+1 (360) 480-3921	carrie.stanley@DOC1.WA.GOV

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Sound Transit Projects - Communications (1 Total)

Search Term

556349

Communication ID: 556349 - Reynolds Reentry Center BLE Scoping Comment

Communication (11/6/2024)

Reynolds Reentry Center BLE Scoping Comment

Department of Corrections leases the building at 410 4th Ave and has been a residential Reentry Center (formerly known as work release) since 1978 and we plan to remain at that site for as long as possible. We refer to the site by the name Reynolds Reentry Center. To date there have been 10,089 people who have had the opportunity to transition from prison to the King County community since the location has been sited for use as a Reentry Center.

A 2007 Washington State Institute for Public Policy study found a lower recidivism rate for people who have a reentry path by progressing from prison through a reentry center on their pathway home at a 2.8 percent rate. At the time of this study, the return on investment was \$3.82 of benefit per dollar of cost which stem from the future benefits to taxpayers and crime victims from reduced recidivism.

We are obligated to provide safe and humane physical plants including full kitchen facilities as we are responsible for meals. We need to consider space needs for residents and office space for staff. This is a 24/7 facility with staff on site and includes 120 beds over six housing unit floors as well as a gym area, dining room, commercial kitchen, programming space, and common areas for TV rooms and gathering spaces for small groups. In addition to residents, the site employs 36 state staff.

RCW 72.65.220 covers the facility siting process for Reentry Centers and includes public hearings and notifications. Below is a link to a website with information related to our last attempt at siting new locations. I also added a link directly to the locations we were looking at starting 2019 and all sites in King County were unsuccessful in siting.

[Reentry_Center_Expansion | Washington State Department of Corrections](#)

[Work Release Expansion Project Evaluated Sites \(wa.gov\)](#)

The residents at Reynolds Reentry Center are minimum security status incarcerated individuals who have been determined to be eligible and suitable for placement at a residential Reentry Center per WAC 137-56. The residents are transitioning from prison to the community and the reentry centers serve as a progressive step to help people support their reentry goals for successful reintegration.

Owner(s):

Contact ID	Name	Type	Phones	Email
1110786	Carrie Stanley	Individual	+1 (360) 480-3921	carrie.stanley@DOC1.WA.GOV
1111824	Reynolds Reentry Center	Organization		

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December 9, 2024

Ballard Link Extension Scoping

Attn: Ms. Lauren Swift

Sound Transit

401 S Jackson St

Seattle WA 98104

Via email: BLEScoping@SoundTransit.org

Re: Ballard Link Extension Scoping

On behalf the Port of Seattle (Port) and Northwest Seaport Alliance (NWSA), thank you for the opportunity to provide additional scoping comments for the Ballard Link Extension (BLE) environmental review. Together, we submitted scoping comments on April 2, 2019, as well as Draft Environmental Impact Statement (DEIS) comments on 4/28/2022 on the W Seattle and Ballard Link Extensions (WSBLE), covering much of the same areas. Rather than repeat those comments, our goal is to identify issues newly identified related to alternatives or elements of the environment. However, for the multiple WSBLE DEIS questions north of S Lander St, the WSLE FEIS noted that those would be addressed as part of the Ballard Link EIS process, and we look forward to the responses for those as well. We hereby incorporate our prior input by reference. Please note, the input of the NWSA is confined to the SODO Segment, in the comments below.

Thank you for your invitations to the Port to serve as a Cooperating Agency and to the NWSA as a Participating Agency. We believe these roles will further the ongoing cooperation between our agencies.

We appreciate Sound Transit's additional studies since the 2022 DEIS on the alternatives for the extension to Ballard, and the direct engagement of design and planning staff with agencies in the proposed alignments. Sound Transit staff has worked with Port and NWSA staff to better understand concerns near port terminals both during construction and during link light rail operations. However, proposed Ballard Link Extension alternatives between SODO and Ballard have the potential to create negative impacts on port terminals and water-dependent logistic functions, especially with surface transportation access. We must continue our work together to find mitigating measures for construction and operational impacts.

Regional Mobility

We ask that Sound Transit consider carefully regional connectivity in the Link light rail system in balance with cultural vibrancy, construction impacts and constructability. The Seattle stations at CID/SODO and Midtown will provide transfer opportunities among the three other lines: to south Seattle/King County, including SEA Airport, to the North and to the Eastside. The DEIS must identify potential impacts of (a) trade-offs in system users' transfer times, (b) building near the cultural hub that is the CID, (c) the duration of construction impacts and (d) the ability to construct in the alternative locations.

SODO Segment

- The expected impacts from BLE in SODO occur both during construction and long-term operations. During the estimated twelve-year construction period, road or lane closures will impact industrial operations and international container cargo flows, by limiting freight mobility on Seattle's Major Truck Streets and by impacting the businesses that create the network of the logistics and industrial business web in SODO. Further, displacing buses from the E-3 busway means more trips on other streets such as 4th Avenue S, resulting in more large vehicles on roads used by port trucks in the Manufacturing Industrial Center (MIC).
- The Sound Transit proposed Holgate St Overpass from 4th to 6th Avenues must be considered for tradeoffs: between trains blocking surface streets without it versus the impacts to truck mobility (from roadway design changes that make maneuvering trucks through the area more difficult due to reduced turn-radius at intersections or steeper slopes for trucks to climb on overpasses).
- The BLE DEIS needs to consider cumulative impacts to truck mobility and overall resiliency of the roadway system. For example, on S Holgate St the city of Seattle is conducting a Railroad Crossing Elimination Study (RCES) of the rails between 1st and 4th Avenues South. Sound Transit's transportation modelling should consider the RCES potential scenarios and necessary mitigation of a closure of the heavy rail crossing on Holgate in SODO. The analysis should consider the impacts to system resiliency resulting from reduced roadway connectivity by evaluating the time it takes the system to recover from unexpected incidents and closures.
- Additionally, the BLE DEIS needs to consider cumulative impacts to industrial and maritime businesses, including physical changes to the road network and business access that may negatively impact truck movements or the ability of existing businesses to operate.
- For construction impacts mitigation, Sound Transit will be constructing the West Seattle Link Extension from Holgate St to the south to West Seattle. Any lessons learned for protecting our industrial economic sector should be applied to this portion from Holgate to the north.

South Interbay Segment

- Please consider alternate construction methods to eliminate or minimize closures of the Galer St Flyover. We ask that you recognize this is the primary access to Terminal 91 through the Main (East) Gate. Access through the West Gate does not have sufficient capacity, nor is it configured to accommodate the truck and vehicle volumes. Terminal 91 is a 200-acre facility which hosts our two-berth Smith Cove Cruise terminal, fishing and seafood processing ships and businesses, and other light industry businesses at T-91. As noted in scoping comments, it's busy year-round; during cruise season (April-Oct), entry and exit vehicle counts are over 10,000 on a peak day. Additionally, the Port is pursuing design and permitting for additional buildings at T-91, so access needs will be growing. We will want to coordinate closely on minimizing impacts to current and future tenants.
- The construction road (or lane) closures identified to date, as well as the duration, will impact industrial activities in the Ballard/Interbay/North Manufacturing & Industrial Center (BINMIC), including fishing and cruise operations, by significantly limiting access or contributing to traffic congestion on Seattle's Major Truck Streets, such as Elliott Way and 15th Avenue W.
- Permanent impacts to freight mobility from placement of the light rail guideway and piers should be minimized in the BINMIC, due to safety, mobility and economic considerations.

- Please consider how Smith Cove and Interbay station locations within BINMIC have the potential to capture potential riders from Port properties, including employees and cruise passengers. What opportunities are there to connect the Interbay Station at Dravus to the visitors and businesses at Fishermen's Terminal?
- We have discussed the potential for light rail utilities to be located on Port property on the former Tsubota Steel site and will consult with you on potential impacts of that siting and access.

Interbay/Ballard Segment

- The road (or lane) closures identified to date, as well as the duration, may impact industrial operations and freight mobility by significantly limiting access or contributing to traffic congestion on Seattle's Major Truck Streets, such as 15th Ave W.

Conclusion

The Port and NWSA look forward to continued collaboration with Sound Transit and other agencies and stakeholders to consider the alternatives that uphold the importance of the Port's economic development mission, and its ability to continue producing family wage jobs and uplift the quality of life in the region. We will continue to be staunch advocates to support an integrated and robust transportation system that is essential to maintaining Puget Sound's economic competitiveness.

We ask that these impacts effects be fully vetted through the environmental review process. Thank you for your consideration and please anticipate our continued involvement.

Sincerely,



Geraldine Poor
Regional Transportation Senior Manager
Port of Seattle



Deirdre Wilson, AICP
Senior Planning Manager
Northwest Seaport Alliance

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Puget Sound Regional Council

1201 Third Avenue, Suite 500, Seattle, WA 98101-3055 | psrc.org | 206-464-7090

December 9, 2024

Ballard Link Extension
Lauren Swift
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Re: Ballard Link Extension Scoping Comments

Dear Ms. Swift:

The Puget Sound Regional Council appreciates the opportunity to comment on the Ballard Link Extensions Scoping document. Implementation of high-capacity transit to support growing communities and provide options for regional mobility is fundamental to the success of VISION 2050, the region's integrated long-range strategy for growth management, transportation and economic development. The Regional Transportation Plan includes extension of high-capacity transit in this corridor as a vital component of enhancing mobility and providing travel choice in the region. Accordingly, PSRC has an ongoing interest in high-capacity transit system planning for the downtown Seattle to Ballard corridor and has been designated as a Participating Agency in this project.

VISION 2050 is centered around a Regional Growth Strategy. The Regional Growth Strategy focuses on locating growth in regional growth centers and near current and future high-capacity transit facilities. Allowing for greater employment and population growth within walking distance to high-capacity transit promotes the use of the region's transit systems and reduces the number of trips that require a personal vehicle. VISION 2050 includes a goal for 65% of the region's population growth and 75% of the region's employment growth to be in regional growth centers and within walking distance of high-capacity transit. This regional scale goal provides a benchmark to inform local planning and continue to focus new growth as transit investments come into service.

PSRC applauds Sound Transit for their work on Racial Equity with the Racial Equity Toolkit and encourages continued work to include marginalized communities in decision making. We commend Sound Transit for their work to date on the West Seattle and Ballard Link Extensions Project and specifically the DEIS effort. Some of our comments on the DEIS also apply to this separate Scoping document. The Ballard Link Extension Scoping document spans the growth management, transportation, and economic development arenas for which PSRC oversees long-range regional planning. The Scoping document has therefore been reviewed by transportation and growth management department staff. Sound Transit is encouraged to consider the following as the process continues:

Travel time and transit access. PSRC recognizes the importance of comparing alignment and station alternatives in terms of the resulting light rail travel time. An important component that we commented on in the past is door-to-door travel time for transit passengers. Many of the stations under consideration are elevated or in tunnels, which provides for grade separation, but could also add travel time for accessing or transferring at the stations. This is especially important with the potential transfer between light rail lines in the Chinatown/International District area and the distance between stations in various alternatives. We encourage Sound Transit to ensure these stations allow for comprehensive access and easy connections by all individuals, particularly people with accessibility and mobility needs, such as older adults and people with disabilities. Doing so will help both reduce travel times for passengers and improve fire and safety emergency preparedness.

Displacement risk. VISION 2050 includes a goal to preserve, improve, and expand housing stock in the region to provide a range of affordable, accessible, healthy, and safe housing choices to every resident. Many transit communities are home to existing low- and moderate-income households at potential risk of displacement due to increased market strength and gentrification that may accompany transit system development. Station construction, although temporary, may further increase that risk. We encourage Sound Transit to continue to analyze displacement risk and include mitigation measures to ensure all people can continue to live in and have access to thriving transit communities.

Lauren Swift, Sound Transit

December 9, 2024

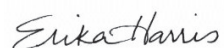
Page 3

Potential impacts to different populations and communities. The PSRC Regional Economic Strategy encourages support for small and medium sized businesses and businesses owned by marginalized communities, including BIPOC, women and immigrant-owned businesses. We encourage Sound Transit to continue to identify ways to mitigate impacts to local businesses and encourage Sound Transit to further support businesses owned by marginalized communities that may be impacted by these projects.

TOD potential. Promotion of transit-oriented development (TOD), characterized by compact, walkable, mixed-use development, is key to implementing the objectives of VISION 2050 and the Regional Transportation Plan. Incorporating TOD in the environmental review of potential high-capacity transit station areas and alignments is an important step toward Sound Transit choosing its investments with current and future land use in mind, and in doing so, building a transit system that supports community building. As planning for the region's critical high-capacity transit system progresses, we encourage Sound Transit to continue to include TOD as a central component of its analysis, think beyond the existing land use patterns and local planning efforts, and fully consider the best ways and locations to achieve equitable TOD, a cornerstone goal of the VISION 2050 Regional Growth Strategy.

The Ballard Link Extension project is an important long-range investment for our region. We commend Sound Transit again for the Scoping effort. We appreciate the opportunity to comment and participate. If you have any questions regarding our comments, please contact Erika Harris, SEPA Responsible Official, at (206) 464-6360 or eharris@psrc.org.

Sincerely,



Erika Harris, AICP
SEPA Responsible Official
Puget Sound Regional Council

cc: Kelly McGourty, Director of Transportation Planning
Ben Bakkenta, Director of Regional Planning

Lauren Swift, Sound Transit

December 9, 2024

Page 4

Charles Patton, Program Manager – Equity Policy and Initiatives

Liz Underwood-Bultmann, Principal Planner

Philip Harris, Principal Planner



December 9, 2024

Via email

Lauren Swift
lauren.swift@soundtransit.org
Central Corridor Environmental and Business Operations Manager
Sound Transit

Dear Ms. Swift,

The City of Seattle (City) appreciates the opportunity to comment on the Federal Transit Authority's and Sound Transit's scoping process for the preparation of the Ballard Link Extension (BLE) Environmental Impact Statement (EIS) (EISX-021-36-R10-1728553542). The City supports Sound Transit's articulation of the BLE project's purpose and need; the alternatives being evaluated; and identification of the types of short-term construction, long-term operational, and cumulative impacts that Sound Transit intends to evaluate and mitigate in the EIS.

Over the past seven years, Sound Transit has been developing and evaluating a range of alternatives for the Ballard Link Extension project. The City has actively participated in the environmental review process for the West Seattle and Ballard Link Extension (WSBLE) as a cooperating agency during that time. The City provided preliminary scoping comments on March 5, 2018 to encourage Sound Transit to keep certain priorities in mind as it developed alternatives. From February 19 to April 2, 2019, Sound Transit conducted a public scoping process for the WSBLE Draft Environmental Impact Statement (DEIS). The City provided extensive scoping comments on April 2, 2019 as part of that scoping process. The City's comments emphasized flexibility when developing alternatives; elevating equity and mitigation particularly in the Chinatown/International District and in the Delridge areas; and consistency with City plans, policies, and regulations.

As a Cooperating agency, the City had the opportunity to review the WSBLE Administrative DEIS and provided detailed comments on May 13, 2021. The City's comments discussed, among other things, the project alternatives and concerns about impacts, technical challenges, and design issues associated with segments and station alternatives. Nearly 100 City staff from over 15 City Departments reviewed the subsequent January 28, 2022 WSBLE DEIS; the City's April 28, 2022 extensive letter with over 1,500 individual comments again discussed the project alternatives.

In July 2022, after the 2022 publication of the WSBLE DEIS and the end of the public comment period, Sound Transit Board directed staff to prepare further studies on numerous aspects of the Ballard alignment, including refinements to station locations and to the alignment. The Further Studies process occurred from August 2022 to March 2023, and the City was actively involved in the Further Studies process and provided input into the refinements that led to changes in the existing alternatives. After the close of that Further Studies process, the Sound Transit Board asked staff to analyze different station location options at South Lake Union and Denny area and report back to the Board. The City was informed and participated in some of that additional work from 2023 to 2024.

Given the exhaustive process to date, the City believes that Sound Transit has identified a reasonable range of feasible alternatives that meet the BLE project's purpose and need. The City supports Sound Transit's development of a BLE Draft EIS pursuant to the National Environmental Policy Act (NEPA) and BLE Supplemental EIS pursuant to the Washington State Environmental Policy Act (SEPA) based upon the

previously identified purpose and need statement and the alternatives that have been developed over the past few years.

The City is eager to partner with Sound Transit as this scoping process ends and Sound Transit moves forward with the next stages of the environmental review process. The City encourages Sound Transit to ensure that the BLE DEIS fully analyzes the impacts of the alternatives, particularly adverse cumulative construction impacts anticipated from Sound Transit’s WSLE and BLE projects and other simultaneously planned transportation projects throughout the region. This light rail project will be transformative to our City. However, cumulative impacts from construction activity in some areas of the City will last multiple years and result in significant adverse impacts on transportation, the natural environment, our local economy, neighborhoods, and businesses and residents. As Sound Transit moves forward with environmental, planning, and design phases, Sound Transit should proactively plan and develop robust mitigation to address project impacts and address community concerns about lengthy adverse construction impacts.

Sincerely,


Jill Macik (Dec 9, 2024 11:23 PST)

12/09/2024

Signature

Date

Jill Macik, SEPA Responsible Official, Department of Transportation, City of Seattle


Elliot Helmbrecht (Dec 9, 2024 11:54 PST)

12/09/2024

Signature

Date

Elliot Helmbrecht, ST3 Designated Representative, City of Seattle

cc:

- Mayor Bruce Harrell
- Deputy Mayor Adiam Emery
- Seattle City Council Member Dan Strauss
- Greg Spotts, Director, SDOT
- Elizabeth Sheldon, Chief Infrastructure Officer, SDOT
- Sara Maxana, Sound Transit Program Director, SDOT
- CJ Holt, ST3 Program Manager, SDOT
- Amy Chasanov, ST3 Mitigation and Concurrence Manager, SDOT
- Vera Giampietro, BLE Project Manager, SDOT

Lauren Swift
Central Corridor Environmental Manager
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Sent via email to lauren.swift@soundtransit.org and blescoping@soundtransit.org

RE: Comments for Ballard Link Extensions Draft EIS

The University of Washington appreciates the opportunity to comment on the Ballard Link Extension (BLE) project scoping for a new Draft Environmental Impact Statement (Draft EIS). The University commented previously on the earlier West Seattle and Ballard Link Extensions Draft EIS and those comments are attached so they will carry forward in this latest BLE Draft EIS.

The University supports the expansion of light rail through the Ballard Link Extension. Light rail is an increasingly important component of the University's efforts to shift students and employees away from single-occupancy-vehicles (SOV) and onto transit. It has helped to lower our SOV rate to one of the lowest of any major employer in the region. Expanding light rail capacity will create new opportunities for our commuters to reach campus.

We request Sound Transit consider the following when preparing the new BLE Draft EIS:

Metropolitan Tract

The University owns approximately ten acres of land downtown between Spring and Union Streets, 3rd Avenue and 6th Avenue. Known as the Metropolitan Tract (Metro Tract), this was the location of the original campus and today includes a number of significant commercial buildings including the Fairmont Olympic Hotel, Rainier Tower, Rainier Square, Skinner Building, Cobb Building and others.

In the latest preferred alternative, it appears the new route goes directly under several buildings on the Metro Tract. The University requests the following questions be studied:

- What is the impact on future development of these sites and adjacent sites from the tunnel underneath? What limitations would this place on the depth of future construction for these sites? What additional requirements would be needed to build above the tunnel, or adjacent to it, and what would those add in cost to construction?
- What is the impact on existing Metro Tract buildings during construction? Would this create settlement, vibration or noise impacts for these buildings?
- Are there alternatives that do not go under buildings on the Metro Tract? Are there alternatives that do not go through the Metro Tract?

- How will construction impact access via all transportation modes to the Metro Tract and how can access be preserved?
- What impacts will occur for street-level retail in the Metro Tract during construction and how can these impacts be mitigated to support these businesses?

South Lake Union

UW Medicine operates several buildings on Republican Street in South Lake Union that provide primary and specialty care together with clinical research. Some of these have vibrationally and electromagnetically sensitive research activities. UW requests the following questions be studied:

- Will the preferred alternative create any vibration or electromagnetic impacts for the research at these buildings?
- Many of the patients at these buildings come by car. What will the impacts be on car access to these buildings during construction and how can access be maintained?
- Is it possible for Sound Transit to use the 7th and Harrison station location for future Transit Oriented Development?

Thank you for considering our requests. We look forward to reviewing the BLE Draft EIS when it is ready.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Blakeslee", with a long horizontal flourish extending to the right.

Julie Blakeslee, AICP
SEPA and Land Use Officer
UW Facilities, Asset Management

jblakesl@uw.edu

Attachments:

- UW ST3 DEIS Letter 040722
- UW Scoping Letter for ST3 100219

April 8, 2022

Sound Transit
401 S. Jackson Street
Seattle, WA 98104

Sent via: wsbledeiscomments@soundtransit.org

RE: Comments for West Seattle and Ballard Link Extensions Draft EIS

Thank you for the opportunity to express both our general support for, and specific concerns with the proposed West Seattle to Ballard Link alignment. The University of Washington supports the expansion of light rail transit in the Puget Sound Region to serve residents, employees, and visitors. We understand Sound Transit has analyzed alignment alternatives, including a preferred alternative, in the Draft Environmental Impact Statement. For your consideration in selecting an alternative for the route and station locations, we provide information about our preference in South Lake Union near our UW Medicine biomedical research facilities and Downtown Seattle near our Metropolitan Tract properties.

UW Medicine Biomedical Research Facilities in South Lake Union

The UW Medicine facilities at South Lake Union consist of five existing biomedical research and clinical buildings and one administrative and dry lab office building. The facilities are located on multiple parcels of land between Mercer and Republican Streets, and Dexter and 9th Avenues. They range in height from 4 to 8 stories and sit above 3-story, below-grade parking and service levels with close to 700,000 square feet (sf) of occupied space above grade and approximately 310,000 sf of below grade parking and service space. UW Medicine has actively supported the City of Seattle's South Lake Union planning and rezoning efforts and worked extensively with city staff to assure each building's use and design support the neighborhood plans and policies.

The facilities contain highly sensitive receptors and experiments which could be subject to potential significant impacts due to construction and operation of light rail near the buildings. Vibration and EMI impacts, in particular, could diminish or completely prevent the research that the individual buildings and this complex was specifically built to provide.

South Lake Union DT-1 Preferred Alternative Support and Potential Impacts

The UW supports the DT-1 Preferred Alternative through South Lake Union.

Bus transit connectivity is an important element of station area planning. Sound Transit, Metro, and SDOT working together for a Harrison/Aurora Ave Mobility Hub is supported by the proposed Harrison/7th Avenue Link station.

The UW is concerned about the impacts of street closures during construction in South Lake Union. The information available from Sound Transit so far is insufficient to understand whether predicted closure time periods are concurrent or sequential, and what tools SDOT and Sound Transit will employ to ensure pedestrian, bicycle, truck and auto access through affected areas.

UW Metropolitan Tract in Downtown Seattle

The University owns multiple contiguous parcels of land in downtown Seattle between Union and Seneca and between 3rd and 6th Avenues, including some of the street right of way (the Metropolitan Tract and related properties). The University may pursue redevelopment of select properties in this area. Redevelopment could include below grade space that is deeper than what exists today.

Downtown Seattle DT-1 Preferred Alternative Potential Impacts

The UW is concerned about the impacts of street closures (4th and 5th Avenues in particular) during construction in Downtown Seattle. The information available from Sound Transit so far is insufficient to understand whether predicted closure time periods are concurrent or sequential, and what tools SDOT and Sound Transit will employ to ensure pedestrian, bicycle, truck and auto access through affected areas, and access to businesses adjacent to these routes. The street closures, noise and general disruption to the University-owned properties on the Metropolitan Tract is something we would like to better understand.

Vibration impacts from construction and operation continue to be of concern for the Metropolitan Tract buildings and tenants that are in very close proximity to the Preferred Alternative along 5th Avenue Downtown (e.g., 5th Avenue Theater, hotel, dining, retail, and office uses). It is noted in the Draft EIS that the depth of the tunnel in this area would result in no impact. The level and intensity of vibration to potentially impact surrounding receptors during construction and operation should be prepared for and mitigated as needed.

Thank you for your consideration of our concerns and comments. We appreciate the conversations we have had with Sound Transit staff and general outreach opportunities.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Blakeslee", with a long horizontal flourish extending to the right.

Julie Blakeslee, AICP
SEPA and Land Use Officer
UW Facilities, Asset Management

lblakesl@uw.edu



FACILITIES

UNIVERSITY of WASHINGTON
Capital & Space Management

October 2, 2019

Sound Transit
401 S. Jackson Street
Seattle, WA 98104

Sent via: wsblink@soundtransit.org

RE: Scoping Comments for West Seattle to Ballard Link Alignment Options

Thank you for the opportunity to express both our general support for, and specific concerns with the proposed West Seattle to Ballard Link alignment. The University of Washington supports the expansion of light rail transit in the Puget Sound Region to serve residents, employees and visitors. We look forward to continuing to discuss Sound Transit's plans. We understand Sound Transit has identified two alternatives, including a preferred alternative, to evaluate in an Environmental Impact Statement. For your consideration in the analysis of alternatives for the route and station locations, we provide information about our concerns for the segment of this alignment in South Lake Union near our UW Medicine biomedical research facilities and Downtown Seattle.

UW Medicine Biomedical Research Facilities in South Lake Union

The UW Medicine facilities at South Lake Union consist of four existing biomedical research and clinical buildings and one administrative and dry lab office building. The facilities are located on multiple parcels of land between Mercer and Republican Streets, and Dexter and 9th Avenues. They range in height from 4 to 8 stories and sit above 3-story, below-grade parking and service levels with close to 700,000 square feet (sf) of occupied space above grade and approximately 310,000 sf of below grade parking and service space. UW Medicine has actively supported the City of Seattle's South Lake Union planning and rezoning efforts and worked extensively with city staff to assure each building's uses and designs support the neighborhood plans and policies.

The facilities contain highly sensitive receptors and experiments which could be subject to potential significant impacts due to construction and operation of light rail near the buildings. Vibration and EMI impacts, in particular, could diminish or completely prevent the research that the individual buildings and this complex was specifically built to provide.

South Lake Union ST Alignments

The map illustrating the Preferred Alternative and other alternative are not specific enough to determine the exact route and station locations. We have concern for any alternative alignments in the South Lake Union/Denny neighborhood that run near our below (and above)

ground facilities along Mercer St. and Republican St. The blue “other alternatives” may be of greater concern. The University has concerns as described below.

Scope of Impact Analysis Required

We believe significant unavoidable impacts could occur and that the following scope of analysis is required to determine those impacts and to inform Sound Transit’s decisions regarding the selection of the ultimate Link light rail alignment. Our reasons are set forth below. They are also informed by the joint understanding we have with Sound Transit around testing, identification and resolution regarding impacts to sensitive receptors associated with the construction and operation of Sound Transit’s University of Washington Station and future U District Station.

Vibration – As noted above, highly sensitive receptors to vibration are in very close proximity to the proposed Link alignment. The level and intensity of vibration on surrounding sensitive receptors from construction and operation of Link light rail due to proximity, depth, soil conditions, and other factors should be analyzed and demonstrated. Please note the variable soil and ground water conditions described below.

Electromagnetic Interference (EMI) – As noted above, highly sensitive receptors to EMI are in very close proximity to the proposed Link alignment. The level and intensity of EMI on surrounding sensitive receptors from construction and operation of Link light rail due to proximity, depth, soil conditions, and other factors should be analyzed and demonstrated.

Geology/Soils – Soil conditions greatly affect the ability to construct light rail (and its cost) and affect vibration and EMI. Light rail alignments have sometimes had to be moved later in the planning or design process due to the discovery of soil conditions. It is imperative that the soil conditions in this South Lake Union area (where the soils are known to be varied or poor and, in some places, contaminated) be thoroughly analyzed and well understood. Based on recent construction activities involving the UW Medicine buildings, we know the soil conditions are varied across the 750 and 850 blocks. Soils on the west side of the complex were comprised primarily of glacial till while soils on the east side were primarily loose fill as part of the Denny regrade. Contaminated soils were identified and removed as part of construction.

Construction Impacts – Impacts to sensitive receptors related to tunneling and station construction, proximity to significant construction truck trip pathways, and potential utility disruption should be analyzed and resolved.

Groundwater – Groundwater conditions can affect the ability to construct light rail and may result in long-term flow control issues. Based on recent work on the UW Medicine facilities, we know that groundwater elevation in the area generally ranges from 16 to 27 feet, which is approximately 20 to 30 feet below the first-floor building elevations. Parking and service levels in UW Medicine’s buildings extend below the groundwater table.

Downtown Seattle

The University owns multiple contiguous parcels of land in downtown Seattle between Union and Seneca and between 3rd and 6th Avenues, including some of the street right of way (the Metropolitan Tract and related properties). The University may pursue redevelopment of select properties in this area. Redevelopment could include below grade space that is deeper than what exists today.

Downtown ST Alignments

Sound Transit Motion No. M2019-51 includes only general descriptions of potential station locations Downtown. Due to the reasons stated above we support an alternative that would have the least potential impact on the Metro Tract and related UW properties.

Scope of Impact Analysis Required

The same scope of impact analysis is recommended for this area of Downtown as listed above for the South Lake Union area with the addition of property ownership, utilities and right of way.

Thank you for your consideration of our concerns and comments. We appreciate the conversations we have had with Sound Transit staff and appreciate the opportunity to discuss these scoping issues with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Blakeslee", with a long horizontal flourish extending to the right.

Julie Blakeslee, AICP
SEPA and Land Use Officer
UW Facilities, Asset Management

jblakesl@uw.edu

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December 17, 2024

Lauren Swift
Central Corridor Environmental and Business Operations Manager
Sound Transit
lauren.swift@soundtransit.org

Subject: Ballard Link Extension – Additional EIS Scoping

Dear Ms. Swift,

The Seattle Design Commission offers comments for the additional EIS scoping for the Ballard Link Extension (BLE). We apologize for sending out comments after the deadline for public comment, and request that they still be considered. The comment period for BLE was during a time when we were busy with WSLE preliminary engineering reviews.

The Seattle Design Commission advises the Mayor, City Council, and City departments on the design of capital improvements and other projects and policies that shape Seattle's public realm. In this role, we have been evaluating and providing advice on Sound Transit's (ST) West Seattle and Ballard Light Rail Extension (WSBLE) projects since 2019.

Members of the Seattle Design Commission (SDC) visited sites along the BLE corridor in November 2024. They looked at publicly available early designs of the preferred alternatives for stations and considered the designs within the built context of the neighborhoods. The focus was on places where the preferred alternative changed after the DEIS was released as a result of further studies. Commissioners considered possible impacts and opportunities. They developed a list of information and analysis that should be provided in the additional DEIS. Providing the information and analysis identified by the SDC will aid us, communities, and leaders in evaluating and deciding which are the best alternatives. It will also help determine how the new facilities can be designed to optimize environmental outcomes.

The SDC requests that the following information be included in the BLE EIS.

CID

First are nine topics that relate to all CID Alternatives:

1. Study the opportunities of joint station and TOD development to address displacement and social justice impacts. Provide scenarios for both conventional development and for

development that addresses social impacts, such as with non-profit partners and including affordable commercial and community space.

2. Study the cultural preservation opportunities and impacts on historical and cultural landmarks in the CID. Identify impacts and opportunities to preserve the community's cultural roots and prevent the erasure of vital spaces.
3. Evaluate and compare the potential of the station location alternatives to contribute toward the vitality of more expanded community use of Union Station as explored in the South Downtown Hub workshops in 2024.
4. Evaluate the impact on low-income residents and marginalized communities, with a focus on potential displacement due to rising rents and gentrification. Study how station locations could either protect or harm these communities.
5. Study accessibility for the elderly and people with disabilities. Assess the safety, accessibility, and ease of use of the alternatives for these populations.
6. Assess the community mobility and transit needs of residents who depend on public transit for daily activities. Focus on integration with pedestrian and bus access, particularly for families, elderly residents, and vulnerable populations needing access to healthcare, work, and community spaces. Provide information specific to accessing culturally relevant healthcare, businesses, and civic institutions.
7. Analyze displacement and gentrification risks, with a focus on impacts to low-income residents and affordable housing in the CID.
8. Evaluate the health and environmental impacts of construction, including air quality, noise, and health risks for vulnerable populations such as the elderly or those with pre-existing conditions.
9. Study the public safety and community well-being impacts of station construction, with a focus on pedestrian safety, neighborhood cohesion, and long-term effects on social fabric, particularly for families and vulnerable populations like seniors.
10. Provide clear graphic depiction of the differences in travel distances and times between the alternatives and key locations within the CID. Also indicate any pedestrian safety challenges along those routes.
11. Provide clear comparative analysis of all CID alternatives that allow community to understand all key metrics used for selecting preferred alternative, including metrics indicated as concerns for community members. This includes construction impacts, access and mobility for all populations (especially older community members) during and after construction, potential connections to Union Station, and business displacement for construction.

Next are topics related to specific locations:

12. CID 5th Diagonal alternative: Study the short-term and long-term impacts on small, family-owned businesses, particularly those that are immigrant-owned or long-established in the community. Assess how construction and potential gentrification could affect these businesses.
13. CID 5th Diagonal alternative: Provide analysis on the potential to connect to Union Station below grade. Also, provide information on travel time and experience between the new station and Union Station for the alternatives.
14. CID Dearborn alternative. Study impacts to freight movements and potential change of impacts to pedestrian and bike movements resulting from rechanneling freight traffic/changing the grid.

15. CID 5th Diagonal alternative. Study both short term and long-term opportunities and impacts to businesses.
16. CID and Midtown alternatives. Evaluate access to health care facilities on First Hill from the BLE stations. Evaluate both how those working at and getting services at the institutions get there via bus and walking, biking, and rolling. Compare the alternatives. Study possible improvements to the I-5 vehicular access routes that might improve First Hill access from the new proposed mid-town location.
17. Dearborn CID and nearby existing stations: Stadium CID and Pioneer Square. Analysis to determine how access to Lumen Field might shift if this alternative is selected.
18. Seattle Center Republican west alternative. Study the potential for integrated station entrances with joint development.
19. Seattle Center Republican west alternative. Study integrating current Dick's drive-in as an anchor tenant in joint TOD.
20. Seattle Center Republican. Analyzing land use/redevelopment and rezoning potential on the west end of Uptown, including near the proposed station entrance at 2nd Avenue West.
21. Interbay Dravus alternative. Analyze zoning and redevelopment potential on the north side of Dravus in the station area.
22. Interbay Dravus alternative. Identify the impacts to vehicular traffic during construction to the Magnolia neighborhood in a scenario where the Magnolia bridge is closed.
23. Interbay Dravus alternative. Study a reduced footprint for the station to minimize the amount of loss of parks land.
24. Ballard preferred alternative. Analyze adding a station entrance north of Market St. Evaluate quantitative and qualitative benefits to people moving from north to the station and those transferring to buses. Analyze impact to current pedestrian flows and ingress/egress for Metro busses if additional station entrance north of Market St is not added.
25. Elevated stations and guideways. Study how impacts of elevated structures, both stations and guideways, can be minimized with activating uses in areas where this is possible.

These comments recommend the scope of City of Seattle work that we believe should be done in parallel with the Sound Transit work.

City

1. Provide urban design planning at and study increasing density at the following preferred alternative station locations: Seattle Center, Interbay, Ballard.
2. Provide access and public realm planning in the broader areas and the direct vicinity of the following preferred alternative station locations: Westlake, Midtown, and Smith Cove.

Sincerely,

Jill Crary

Chair, Seattle Design Commission

CC: Amy Chasanov, City of Seattle

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