

# Appendix C

## **Business and Business Organization Comments**

December 9, 2024

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

Dear Ms. Swift,

We appreciate the opportunity to provide input on the Ballard Link Extension (BLE) project scoping for a new Draft Environmental Impact Statement (Draft EIS). We are a coalition of downtown Seattle stakeholders led by the Seattle Metropolitan Chamber of Commerce (Chamber) and Downtown Seattle Association (DSA) working together to plan for light rail construction.

We represent the region's major employers, arts and culture organizations, property owners, freight, sports, and community leaders. We are enthusiastic supporters of expanding light rail and have a strong track record of championing Sound Transit projects throughout the region. We recognize that a new tunnel through downtown Seattle is necessary to extend light rail to Tacoma and Everett.

Our goal is simple – work with Sound Transit and the City of Seattle to keep the Ballard Link Extension on schedule by developing strategic solutions that minimize disruptions during construction and support downtown's vibrancy. We believe that goal is achievable if Sound Transit incorporates the issues highlighted in this letter and the attachments into the new BLE Draft EIS.

### **Summary**

Downtown Seattle's future is bright and poised to capitalize on significant public and private investments and events, such as the new Waterfront Park, the Ocean Pavilion at the Seattle Aquarium, a new Convention Center, and FIFA Men's World Cup 2026. Constructing six stations and two transit tunnels concurrently under downtown Seattle, the region's hub for jobs, arts, sports, and tourism, for 10+ years, will require proactive and innovative strategies and investments not typically used by Sound Transit to avoid irreparable harm.

The new Draft EIS must identify impacts and propose specific mitigation strategies for the concurrent station and tunnel construction, which the 2022 WSBLE Draft EIS did not do. Those concurrent impacts should be based on the current design of the preferred alternative and include all topics typically analyzed in a new Draft EIS, not limited to transportation. The Draft EIS must include mitigation that takes into consideration the 10+ years of construction impacts, which are effectively permanent, not temporary. We look forward to a solution-oriented and collaborative

partnership with Sound Transit and the City of Seattle to be ready for construction so that downtown Seattle remains vibrant, connected and ready to reap the benefits of improved transit service when the BLE opens to riders.

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

### ***Downtown Seattle is the region's hub for jobs, arts, sports, and tourism***

Downtown supports more than 337,000 jobs, 106,000 residents, and 3.5 million visitors annually. It is home to six professional sports teams, approximately one million square feet of convention center space, a symphony hall, an opera house, and more than a dozen stages for live theater, dance, comedy, and musical performances throughout the year. That is why the spine of the Puget Sound regional light rail system is adjacent to the I-5 corridor and why the dedicated light rail tunnel and BLE Project through downtown Seattle is needed. It also highlights the layers of complexity that must be considered so that the BLE project is designed, constructed, and delivered with minimal impact to downtown.

Downtown has seen transformative growth over the past two decades—residential population surged by nearly 100% between 2010 and 2020, and business activity expanded at an unprecedented rate, establishing downtown as the region and state's economic engine. Furthermore, the City of Seattle's growth plans focus 50 percent of new jobs and 17 percent of all new housing in this regional center. The growth in housing represents the largest increase of any regional center in the Puget Sound area. As the region's businesses and economic hub, downtown generates significant tax revenues for the state, region, and city through property, sales, excise, and utility taxes.

Additionally, downtown foot traffic is steadily rising, with over 90,000 weekday workers as of mid-2024, marking a 14% year-over-year increase. As major employers such as Amazon and Starbucks increase their in-office presence in 2025, this daily influx of workers will grow further. To ensure light rail expansion enhances rather than disrupts this momentum, it's essential that Sound Transit build's light rail in a way that avoids, minimizes, and mitigates direct, concurrent, and cumulative impacts on downtown, the region, and the state.

### ***Downtown's future is bright and resilient post pandemic***

The pandemic resulted in a significant decline of local visitors and office workers downtown as evidenced by the following:

- The average annual frequency of local customers to downtown's core has fallen by almost half, while other regional retail hubs have seen levels return close to pre-pandemic levels.
- Similarly, patrons of downtown's performing arts venues, museums, and attractions have remained below pre-pandemic levels.
- The downtown retail sector has seen nearly a 20 percent decline in jobs since 2010.
- Public safety and public health challenges have placed downtown's recovery at further risk.

Despite these challenges, there are major investments set to transform downtown Seattle in the next decade. With the opening of the new \$806 million Seattle Waterfront, Seattle Convention Center expansion, the new Ocean Pavilion at the Seattle Aquarium, and the 2026 FIFA Men's Soccer World Cup, downtown Seattle will welcome millions of local visitors, tourists, and workers. These new and upcoming investments are poised to generate economic growth and vitality for downtown, but this progress is at risk if construction impacts are too disruptive.

### ***Our comments on the new Draft EIS analysis***

The BLE will be the single largest infrastructure project in downtown's history. For the purposes of this scoping comment letter, downtown Seattle is defined generally as the area from Mercer Street south to the Chinatown-International District, Pioneer Square and stadium district, and from Interstate 5 west to First Avenue.

The most significant adverse impacts from the BLE project will be construction impacts, a result of constructing six new stations and two tunnels concurrently in the densest urban environment in Washington state. Detailed comments about those impacts are provided in the two attachments.

#### **1. Reflect current design of preferred alternative**

Since the 2022 WSBLE Draft EIS was published, Sound Transit has selected and advanced the design of a preferred alternative. This means more is known about the project's footprint and how it will be constructed. Assessing known impacts to inform decision-making is a primary purpose of NEPA. Therefore, it is imperative that Sound Transit disclose all new and additional information in the new Draft EIS so that the related impacts can be thoroughly analyzed and mitigated.

#### **2. Include specific mitigation measures**

Sound Transit's proposed approach to the new Draft EIS is to include high-level descriptions of impacts and descriptions of possible mitigation measures. The public will then comment on the Draft EIS – the only comment opportunity after the scoping period – without any detailed information about impacts and mitigation. This leaves the public no opportunity to review and comment on the agency's proposed mitigation measures.

Sound Transit must include in the new Draft EIS more detailed information about impacts to downtown and specific mitigation strategies that address those impacts. This approach will support a collaborative effort by the downtown community with Sound Transit and the City of Seattle during the Draft and Final EIS process to advance practical and achievable solutions for avoiding, minimizing, and mitigating impacts.

#### **3. Analyze impacts of building six stations and two tunnels concurrently.**

Six new stations and two new tunnels along a three-mile alignment in the state's densest urban core will require a level of planning, design, coordination, and construction unlike anything Sound

Transit has undertaken to date. Furthermore, the proximity of these stations to each other and the construction sequencing required to ready the stations to accept the tunnel boring machine will necessitate concurrent construction throughout downtown from Seattle Center to the Chinatown-International District for at least 10 years (not including three years of early utility relocation).

The area's geography with Puget Sound on the west and I-5 on the east constrains the downtown transportation grid, which means road closures and congestion impacts reverberate through the network. Sound Transit must study, disclose, and propose mitigation solutions related to the impacts of simultaneous construction of the six stations and tunnels. The 2022 WSBLE Draft EIS assumed localized impacts of each of the six downtown stations without consideration of the other stations. This approach failed to identify and analyze the collective impacts that will occur because of simultaneous construction. This analysis should include all system-wide potential impacts and not be limited to transportation.

For the past decade, downtown has experienced a tremendous amount of construction with the SR 99 tunnel, Alaskan Way Viaduct demolition, new Waterfront, Climate Pledge Arena and other private projects. In the next decade, other construction projects, including the Revive I-5 project, Memorial Stadium, the West Seattle Link Extension, Seattle Transportation Levy investments, and private development will be under way in addition to the BLE project. Post-pandemic, the cumulative disruptions these projects pose to downtown's economic vitality cannot be understated and must be analyzed in the new Draft EIS.

#### **4. Evaluate 10+ years of construction impacts as permanent impacts to be mitigated**

The BLE will be perhaps the most impactful construction project for Seattle since I-5 was constructed through the city in the sixties. We must underscore that a decade plus of construction will have a permanent impact throughout downtown Seattle.

The 2022 WSBLE Draft EIS referred to construction impacts as temporary. This characterization does not reflect the one-of-a-kind density of businesses, residences, restaurants, retail, entertainment, arts and culture venues, sports, and tourism destinations downtown, which minimizes the scope and scale of the impacts, and mitigation required. It is also not consistent with the Seattle Municipal Code (23.42.040) that allows for temporary uses not otherwise permitted or meeting development standards as anything less than six months.

Further, these impacts will be wide ranging, and will affect the transportation network, the local and regional economy, access to social services, housing development and job creation, and potential displacement of residents and businesses. Proposed mitigation measures should not be high-level generic solutions but should reflect these specific impacts.

## **5. Acknowledge impacts, be solution-oriented, and collaborate**

A connected, accessible, and vibrant downtown Seattle that remains robust throughout light rail construction is our top priority. Light rail expansion supports the Puget Sound region's economic growth, but it must do so without jeopardizing downtown's quality of life or business operations during construction. We know that this project will have impacts that are significant and long in duration, so we must have a construction approach and mitigation plans that comprehensively address the concurrent and cumulative impacts to minimize disruptions and ultimately deliver broad benefits. Achieving this will define success for the BLE.

We understand that Sound Transit will consider all previous scoping comments and comments on the 2022 WSBLE Draft EIS in the preparation of the new BLE Draft EIS. However, there is much more information available today about the project definition and impacts plus two new station locations. We offer these detailed comments with the goal of ensuring the environmental review process stays on schedule by identifying and addressing impacts as early as possible.

While our letter and the two attachments focus on the six downtown stations, we are strongly supportive of the entire BLE project and encourage Sound Transit to conduct similar analysis for the Smith Cove, Interbay, and Ballard stations.

In closing, we write this letter in the spirit of partnership and collaboration and as longstanding transit supporters, with a shared goal to build the best project as quickly as possible. We know this is achievable – similar large projects have been constructed downtown and serve as models for successful mitigation.

We support a construction approach and mitigation plans that minimize disruptions and ultimately deliver broad benefits. The issues we have raised are consequential to the economic well-being of the entire region and should be evaluated and addressed as such. This project will serve the region for the next century, and we should collectively work towards outcomes that enhance Seattle's growth and vitality in the near and long term.

We thank Sound Transit in advance for addressing these issues in the new Draft EIS.

Sincerely,



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Senior Manager of Public Policy  
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## Attachment 1 - General Comments

### Concurrent and cumulative impacts

Since the 2022 WSBLE Draft EIS was published, new public and private projects have been proposed throughout downtown Seattle and the adjacent neighborhoods. The new Draft EIS should analyze the concurrent impacts of excavating and constructing six stations simultaneously as well as the cumulative impacts of public and private project construction occurring at the same time as BLE construction.

For example, in the next decade, other construction projects including the Revive I-5 project, Memorial Stadium, the West Seattle Link Extension, Seattle Transportation Levy investments, and private development will be under way in addition to the BLE project, creating cumulative impacts. It is imperative that Sound Transit and the city, and other government agencies coordinate careful planning to minimize the impact of these projects.

Lack of analysis of specific, concurrent, and cumulative impacts will create unintended consequences for downtown Seattle. The new Draft EIS should include specific mitigation strategies to address those impacts and will be inadequate without this information.

### Economic impacts

The 2022 WSBLE Draft EIS did not adequately assess the economic impacts of station construction to downtown Seattle. There were only two paragraphs (Section 4.3.3.4.4) that described the economic impacts of the Downtown Segment and were generic and focused primarily on Seattle Center.

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.

Alternative DT-2 would be less disruptive to businesses in the downtown retail core in comparison to Preferred Alternative DT-1 but would require construction in the basement of several retail buildings. With either alternative, road and lane closures



around the Seattle Center Station would cause increased congestion in the area, and could make access to Climate Pledge Arena and other Seattle Center venues and amenities more difficult. Project construction is not expected to notably affect attendance at larger events and performances, such as hockey games. However, there could be effects on event attendance and revenue for smaller events. With Preferred Alternative DT-1, the closure of 2nd Avenue North and August Wilson Way during construction could affect access for maintenance and event vehicles in this area. During construction, Sound Transit would coordinate with Seattle Center to minimize impacts to events on the campus and to permanent tenants. Impacts to freight mobility and access would be minimal and are described in Section 3.19.4.6, Freight and Mobility Access, in Chapter 3

The Alaskan Way Viaduct replacement economic impact study completed in 2006 calculated a negative impact of \$3.4 billion annually for each year of viaduct closure. This study was completed almost 20 years ago when Seattle was much less densely developed than it is in 2024, and the viaduct replacement project did not directly disrupt as many economic sectors or geographic submarkets within downtown so for Sound Transit to address economic impacts with two paragraphs in the 2022 WSBLE Draft EIS is inadequate.

Sound Transit must take a different approach to the new Draft EIS. Concurrent construction across downtown – the economic heart of the region and state – for 10+ years will have impacts to the economy from the loss of conventions, tourists, workers returning to the office, high hotel vacancy rates, increased commercial and retail vacancy rates, etc. These impacts cannot be mitigated by detours and businesses are open signs, as suggested in the 2022 WSBLE Draft EIS.

History has shown that major urban transportation infrastructure projects – including transit projects – if not done well, can fundamentally and profoundly damage the neighborhoods through which they pass. The construction of the Third Avenue bus tunnel in Seattle is a classic example of the lasting impact of large infrastructure projects on the built environment and street-level businesses.

Before the bus tunnel was built, Third Avenue was a busy, active street lined with small shops and high foot traffic. The construction put the street level retail out of business; when the bus tunnel opened, the street itself was largely deserted and sterile. Street level crime moved in, and that further dissuaded new businesses. Today, more than thirty years after the bus tunnel opened and despite years of effort to address these concerns, Third Avenue remains an area with significant challenges, including vacant retail spaces, street disorder, and an urban environment that is not welcoming to visitors, transit riders, and workers.

The pandemic demonstrated that blight could occur even in a vibrant city such as Seattle. The downtown retail and hospitality sector struggled as customers stayed away and the same thing can

happen because of BLE construction if closed streets and intersections make it difficult or impossible for pedestrians and motorists to access restaurants, stores, and shops. The owners of those businesses may have no choice but to close, especially given the 10+ years of construction.

On the other hand, with adequate mitigation, a neighborhood can emerge from a transportation mega-project relatively intact. The survival of Pioneer Square and the Waterfront from the seawall and waterfront park construction, the First Avenue water line replacement, the Viaduct replacement and the streetcar construction is evidence of that fact.

The impacts to the following corridors of economic activity in downtown Seattle should be identified in the new Draft EIS:

- Seattle Center attracts over 12 million visitors annually – equally divided between visitors from King County and visitors from Washington State and beyond – to the dozens of unique arts, culture, sports, and educational organizations that employ thousands of people. An economic study conducted in 2016 found that the combined spending of Seattle Center visitors and businesses created \$1.864 billion in business activity, 18,621 jobs, and \$631 million in labor income in King County in the year 2016. This spending also generated tax revenues of \$90 million to state and local governments.
- High density of residents and jobs and street-level businesses and hotels in the South Lake Union and Denny Triangle area, neighborhoods that will be impacted by concurrent construction of the South Lake Union, Denny, and Westlake stations from the closure of streets, relocation of major transit routes, and large construction staging areas disrupting pedestrian and bicycle routes.
- Pike and Pine streets from the Convention Center to the waterfront connect hotels, retail, restaurants, arts and culture organizations, cruise ships, and entertainment venues that are visited by hundreds of thousands of international, U.S., regional, and local visitors annually. These two streets along with Fourth and Fifth avenues will be significantly impacted by Westlake station construction. The visitor spending in this corridor generates substantial revenues for the city of Seattle, King County, and Washington state and employs hundreds of thousands of people. The Pike Place Market alone attracts 10 million visitors annually.
- The Westlake station area is home to regional retail destinations, including Nordstrom’s flagship store, Westlake Mall, and Pacific Place. Many retail businesses and restaurants have left the area since the pandemic and there are private and public investments underway to invest in the health of the downtown retail sector. Constructing a station in the heart of the retail district will displace more businesses, which will in turn hurt the remaining retailers, leading to long-term impacts to partnerships and distribution, sales and brand reputation, and major events that attract visitors to the area.
- Both the Pioneer Square and the Chinatown-International districts support a high percentage of small, locally owned businesses, which contribute to the vibrancy of the communities and attract visitors from around the world. These small businesses are

particularly vulnerable to impacts from large infrastructure projects that disrupt the social cohesion and foot-level traffic that enables their businesses to succeed.

The new Draft EIS should include a full economic analysis of the impacts, including the loss of jobs, and Sound Transit should propose innovative and comprehensive mitigation to address those impacts. Measures that should be proposed include a marketing plan with global reach to ensure people continue to visit downtown Seattle during the 10+ years of construction; a business attraction and retention plan so national and foreign direct investment in Seattle businesses continues; maintaining pedestrian corridors that are legible and well-lit for a quality visitor experience; and funding for business districts and community organizations to provide direct and indirect economic development support.

The economic analysis should also include the loss of development opportunities and mitigation should be proposed to address those impacts. Properties surrounded by long-term road closures cannot be developed during construction, which will impact the owner's economic investment and tax revenue to local governments and the state. Loss of development opportunities will also reduce revenue to affordable housing from the City of Seattle's Mandatory Housing Affordability program. If the City of Seattle is not able to fund the construction of affordable housing, downtown businesses will not be able to attract employees and thus contribute to our region's economy.

The economic analysis should also consider reduced attendance at events that will adversely impact the collection of Admission Tax, which is one of the significant funding sources for arts and culture in the city of Seattle, which will further impact these organizations.

## Public safety and security

The numerous street and sidewalk closures, large construction sites and staging areas across downtown will have the effect of isolating areas of the urban environment, disrupting the normal flow of traffic and pedestrians. This will create pockets of dead zones that pedestrians will avoid because they perceive them as unsafe, leading to economic losses for ground-floor businesses that rely on foot traffic.

The new Draft EIS should identify the concurrent closures of traffic lanes, sidewalks, and bicycle lanes and analyze their impact on a pedestrian's and vehicle's ability to travel through the construction areas throughout downtown. Mitigation to address these impacts should be identified and include actions such as adopting CPTED practices and hiring additional security personnel.

## Property acquisition

The concurrent construction of six new stations will require the acquisition of large parcels of land throughout downtown Seattle, disrupting the urban fabric, neighborhood cohesion and social resources that are made up by the businesses, arts and culture venues, the Convention Center, Pike Place Market, and other regional destinations in downtown Seattle.

The new Draft EIS should identify how Sound Transit will dispose of property it acquires or enter into joint development agreements so that where feasible, new transit-oriented development is complete when light rail service begins. If property disposition cannot be completed before the project opens, the new draft EIS should identify mitigation strategies that minimize the impact of vacant properties, such as temporary activation. Mitigation considered should also include leasing property for construction staging rather than acquisition so the private sector is able to develop the property as soon as it is no longer needed for staging.

The Capitol Hill and U-District stations are both examples where transit-oriented development was not complete until several years after station opening, which extended the duration of impacts to the community.

## Construction approach

To be considered adequate, the new Draft EIS should describe the potential construction approaches for each station and disclose the impacts – transportation, noise, vibration, economic, safety, etc. – of each approach assuming concurrent construction at the other downtown stations.

Repeating the 2022 WSBLE Draft EIS approach, which generically described construction approaches, will not adequately disclose the extent of impacts to the station areas and downtown. It will also fail to capture the full extent of concurrent impacts on downtown, especially considering there are likely only one or two viable construction options for each station. For example, the 2022 WSBLE Draft EIS identified sequential excavation as the only likely construction approach for the Westlake Station, but did not identify the impacts associated with that approach or mitigation.

While we understand the construction approach will evolve during the final design and after a contractor is selected, it is inadequate to fail to disclose possible impacts because Sound Transit wants flexibility to leave means and methods decisions to the contractor. Given the complexity and scale of this project and to improve the likelihood of competitive bids, there will likely be multiple contractors working concurrently throughout downtown. It is the responsibility of Sound Transit to set standards and requirements for contractors that address impacts on the surrounding community. An adequate Draft EIS must identify, disclose, and propose strategies to avoid, minimize, or mitigate impacts that will be incorporated into standards and requirements contractors will be required to meet.

## Noise and vibration

Downtown Seattle is home to 106,000 residents, multiple unique arts and culture organizations, and research facilities that are sensitive receivers for noise and vibration impacts. The new Draft EIS should list the sensitive receivers along the corridors, identify the impacts to these sensitive receivers, and propose how noise and vibration variances along the corridor during construction will be used so the public can comment on possible impacts. Additionally, the new Draft EIS

should identify the noise and vibration thresholds specific to the actual affected venues and existing conditions that will be used to define the design specifications and standards for operations. Mitigation plans that reduce and avoid impacts at the source, like the floating slabs used for UW labs, should also be included.

Noise and vibrations will be felt in areas outside the immediate station area. This analysis should also consider the impacts of station construction happening concurrently within close proximity to each, such as the Denny and South Lake Union stations.

## Public and private utilities

Given the 10+ years of construction at each station location, it may be more cost effective and efficient for Sound Transit to proactively work with utility providers to identify and implement mitigation measures that can be put in place at the start of utility relocation where significant transportation and other impacts will be realized even before station excavation begins.

However, Sound Transit does not disclose the impacts of private and public utility relocation that is necessary for the BLE project to be constructed, which limits effective coordination and leaves the public unable to comment on the potential impacts of this work. For example, the 2022 WSBLE Draft EIS stated that, “Additional road or lane closures may be needed for utility relocation, which would be determined during final design in coordination with the utility owner.”

The new BLE Draft EIS will be inadequate if it does not analyze impacts of utility relocations that will close travel lanes, sidewalks, or bicycle lanes for periods greater than six months and then propose mitigation measures, including those that could also address impacts of light rail construction. Sound Transit should use this information to proactively coordinate with utility providers.

## Access to social and health services

Downtown Seattle is home to the largest number of social service and public health providers in the region serving a mix of socioeconomic groups and people with limited mobility. The concurrent construction of six stations across downtown will impact access to buildings, change transit routes, and close sidewalks potentially impeding access to these services, especially in the Pioneer Square and Chinatown-International District neighborhoods.

For example, the preferred location of the CID station is near the Seattle Indian Center, the Chinese Information and Service Center, Keiro Northwest, International Community Health Services’ International District Medical and Dental Clinic, and the International District/Chinatown Community Center which serve thousands of seniors and families. The new Draft EIS should identify these potential impacts and propose solutions that work for a wide range of people accessing these services.

## Assessing and mitigating community impacts

The Chinatown-International District is a neighborhood with a rich immigrant history, culturally significant institutions, and a diverse mix of residents and small businesses, primarily people of color. In 2023, the National Trust for Historic Preservation identified Chinatown-International District as one of most endangered historic neighborhoods in the nation, at risk for displacement from infrastructure projects.

The district has been a center for Asian Americans for decades and is a hub for small businesses, community groups, and residents. The loss of small family-owned businesses and residents due to displacement would be irreplaceable for this community. Sound Transit must acknowledge the historic racism that has impacted the health and well-being of this neighborhood and center community needs. Given the unique and historic nature of this neighborhood, as part of the new Draft EIS, Sound Transit must conduct a community impacts assessment and suitably mitigate impacts to the community through a community development fund.

## Disruptions to existing light rail service

The new downtown Seattle transit tunnel will add the required capacity to extend light rail to Everett and Tacoma by moving the 1 Line service into the new tunnel. It will also provide a transfer point between the 1, 2 and 3 Lines at the existing Westlake and Pioneer Square stations.

The new Draft EIS should analyze the impacts on existing service when moving the existing 1 Line to the new tunnel and connecting the existing Westlake and Pioneer Square stations to the new tunnel and identify the appropriate mitigation. It is not reasonable to assume these operational changes will have no impact on existing service and the thousands of riders using the system daily when BLE service begins. These impacts will require substantial mitigation on the scale of what was necessary when the Alaskan Way Viaduct was closed prior to the opening of the SR 99 tunnel.

## Transportation analysis focus areas

In addition to the station-specific concerns identified in Attachment 2, the following provides general areas of concern that are applicable to all station locations. Based on the concurrent construction of six stations along the three-mile alignment, there will be significant impacts to pedestrian and vehicle mobility through the downtown area.

The new Draft EIS should include a comprehensive traffic analysis assessing these impacts and identification of appropriate mitigation measures. Mitigation measures should be defined based on a coordinated and collaborative process with area businesses and residents. It is vital during the post-COVID period as downtown Seattle looks to regain its position locally, nationally, and internationally that construction does not act as a barrier for employees, residents, and visitors. The analysis should consider the following:

- Traffic volumes utilized in the analysis should consider **return to work policies** to be implemented in January 2025. This will result in increases across all modes of transportation, particularly pedestrian and vehicle traffic throughout downtown.
- Traffic analysis methodology should consider **measures of effectiveness** such as travel time and corridor operations, not just individualized intersection level of service.
- The traffic analyses should evaluate key corridors and include all street closures or modifications in conjunction with the concurrent station construction. A time period should be identified that reflects the maximum period of constraints. Given the street closures anticipated, shifts in traffic are expected to overburden parallel facilities. Looking at corridor operations that take into consideration future construction projects that will overlap with BLE and shifts in all modes will provide a better representation of future operations in the area and inform mitigation opportunities.
- Construction laydown sites and traffic routes should be identified to assess impacts on the transportation system. If design-build is the preferred construction approach, it can mean postponing important means and methods decisions until contractors are hired. However, the potential magnitude of the impacts of the BLE necessitates earlier decisions regarding construction laydown sites, construction routes, and closures of roads and intersections. Meaningful analysis of the construction impacts cannot otherwise occur.
- Analysis scenarios should consider **event and non-event conditions**. Events occurring in the Seattle Center area as well as the Chinatown-International District, SODO, and stadium area have a significant impact on transit, freight, and cars.
- While construction means and methods may not be known, the analysis should consider reasonable construction alternatives for purposes of conducting the analysis.
- An assessment regarding transit (e.g. buses, light rail, BRT, streetcar,) impacts should be included in the scope. This includes an assessment of impacts to transit travel times, access to stop locations, and general circulation. With the anticipated closures, route redundancy will be limited.
- Impacts to parking need to be assessed for each station area as well as downtown, which already is perceived as a difficult place to find parking. Sound Transit should make every effort to sustain on-street parking and access to surface parking lots and garages. The analysis should identify the number of on-street spaces taken off-line as well as any impact to off-street parking facilities. It should also identify mitigation to address impacts to access and wayfinding and public perception of lack of parking availability downtown.
- Document existing shared mobility (i.e. scooter) parking areas impacted by construction and identify alternative locations.



## Successful mitigation practices

When proposing mitigation in the new Draft EIS, Sound Transit should consider recent downtown projects that committed to and implemented successful mitigation practices, including:

- **Climate Pledge Arena:** This project is a good example of proactive community engagement during construction. Not only did the owner do the usual and expected engagement (24-hour hotline, website, monthly meetings), they were actively walking around the site with community members, proactively holding coffee dates/open houses to hear concerns and regularly documenting how they were addressing concerns that had arisen.
- **Alaskan Way Viaduct Replacement/SR 99 Bored Tunnel:** WSDOT mitigated the loss of waterfront public parking by making short-term parking available to encourage visits to local restaurants and ground-floor retail, funding a waterfront shuttle (which was continued through the Elliott Bay Seawall and waterfront park construction), and investing in marketing to inform the public the waterfront was open and accessible during construction.
- **Elliott Bay Seawall Project:** The City of Seattle and waterfront businesses mutually agreed the best way to rebuild the seawall was for the businesses to close for a set period, for which they were compensated. This allowed construction to proceed more efficiently without having to maintain 24/7 access to businesses, loading docks, etc. While this may not be appropriate in every situation, it demonstrates the kind of creative thinking that can meet the needs of the community and Sound Transit.
- **Waterfront Seattle:** The reconstruction of Seattle's waterfront included investments in community organizations to hire experts to coordinate construction with the adjacent businesses, functions typically fulfilled by agency staff. This resulted in a more efficient and effective working relationship through proactive problem-solving that kept construction on schedule and addressed impacts on businesses in real-time.
- **Convention Center Expansion:** As part of the property purchase agreement, the Seattle Convention Center made investments in the community, including funding for affordable housing, parks and open spaces, improvements to Pike and Pine streets, bicycle infrastructure, a study of lidding I-5 and other community projects.



## Attachment 2 - Station-Specific Comments

The following comments focus primarily on the construction-related impacts of the preferred alternative, however, we acknowledge that there continues to be disagreements about some of proposed station locations.

We recognize the regional importance of the BLE project and, given its duration, scope and magnitude of the construction activities, the high likelihood that the project will result in significant impacts to downtown Seattle from the Chinatown-International District to Seattle Center during the construction period. This is due to the activities at each station, but more importantly, the concurrent construction of all stations.

Previous analyses presented by Sound Transit in the 2022 WSBLE Draft EIS (*West Seattle and Ballard Link Extensions DEIS: Transportation Technical Report Appendix N.1, January 2022*), did not evaluate the concurrent impacts nor did it identify or present specific mitigation measures during the concurrent station construction that would help offset or minimize the construction impacts. Also, in assessing the construction related impacts of the BLE project previously, there was reference to the impacts as temporary conditions.

Seattle Municipal Code section **23.42.040 - Intermittent, temporary, and interim uses**, Section F specifically addresses Light Rail Transit Facility Construction. Section F, Subsection D states the requirements related to Parking and Traffic.

- 1) Measures addressing parking and traffic impacts associated with truck haul routes, truck loading and off-loading facilities, parking supply displaced by construction activity, and temporary construction-worker parking, including measures to reduce demand for parking by construction employees, must be included and must be appropriate to the temporary nature of the use.
- 2) Temporary parking facilities provided for construction workers need not satisfy the parking requirements of the underlying zone or the parking space standards of [Section 23.54.030](#).

While the requirements specifically speak to haul route impacts, the impacts associated with long-term street closures should be considered. As an example, for the construction of the Seattle Convention Center loading dock under Olive Way, a temporary roadway was required to maintain vehicle connections to I-5. The same mitigation requirements should be applied to this project.

When considering the concurrent station construction, impacts to the following areas are anticipated and should be identified in the new Draft EIS along with proposed mitigation strategies:

- Public transit stops and routing
- Private employer-sponsored programs
- Pedestrian circulation and safety
- Impacts to bicycle facilities and general mobility
- Vehicle congestion and mobility
- Impacts to loading docks and parking facilities necessary to maintain the functionality of buildings and supporting uses
- General impacts of truck traffic related to concurrent excavation of the stations
- Coordination of utility and early work by others (Seattle, utility franchises, etc.)

Road and sidewalk closures will impact multiple modes concurrently and should be considered in the analysis.

The following identifies concerns – transportation and other issues – specific to each station that should be analyzed with specific mitigation proposed in a comprehensive analysis of the concurrent construction impacts.

## Seattle Center Station

### Transportation

- Disclose the impacts to north/south and east/west vehicle mobility due to the sequence and duration of construction along Republican Street.
- Identify impacts to bike facilities and mitigation measures.
- Over 40 arts and culture venues exist in the Seattle Center area as well as Climate Pledge Arena and Memorial Stadium resulting in frequent elevated traffic volumes. Vehicle mobility under these conditions should be assessed considering a reduction in roadway capacity, including impacts on visitors and employees of the venues as well as traffic traveling through the area.
- Patrons visiting the various venues park throughout the Uptown/Seattle Center area. The pedestrian routes from parking areas to the venues could be severed by the closure of Republican. Alternative pedestrian routes need to be defined and mitigation to improve the routes (signage, lighting, civil improvements) need to be identified.
- Multiple transit routes either cross Republican Street or travel along Republican Street within the closure area as documented in the 2022 WSBLE Draft EIS. These impacts should be assessed as improvements are likely required at adjacent facilities to provide equivalent speed and reliability of the existing service. These solutions may impact capacity for general purpose traffic in the area.
- Impacts and mitigation measures need to be identified to address impacts to on-street loading zones and access to off-street loading zones and parking accessed from Republican. These impacts need to be disclosed, and mitigation measures identified.

- There are numerous event venues that will be impacted by haul routes and deliveries during construction. These routes and volumes should be reasonably estimated and impacts disclosed.
- Impacts to the local parking supply and mitigation should be identified based on increases in construction workforce parking.
- Impacts and mitigation measures should be identified to address impacts on back-of-house and production loading zones for all Seattle Center organizations, including the Space Needle, MoPop, Climate Pledge Arena, KEXP, Seattle Rep and McCaw Hall.

#### Public safety

People attending sports and cultural events at Seattle Center rely on private and public parking on the streets surrounding the preferred Seattle Center station on Republican Street. In addition, the area adjacent to the east end of the construction zone at Queen Anne Avenue and Republican is home to a transit stop with high-frequency routes and street-level retail that relies on foot traffic.

The construction and staging areas analyzed in the Draft EIS should identify impacts to access to the parking and transit facilities in the area and specific mitigation strategies, such as well-lit and continuous pedestrian walkways that eliminate dead zones where pedestrians feel unsafe and thus avoid. These impacts should also be analyzed in the context of concurrent and similar impacts at the South Lake Union station where Seattle Center visitors also park or take transit.

#### Cumulative impacts

For the Seattle Center station, the following projects should be included in the cumulative impacts: Revive I-5; Seattle Transportation Levy Projects; and major private property developments.

## South Lake Union Station

#### Transportation

- Extended closure of Harrison Street will significantly impact vehicle mobility and access to SR 99. Full or partial closure of Harrison Street will have a broader impact on the South Lake Union transportation system. Anticipated shifts in traffic within the South Lake Union area need to be evaluated, disclosed, and mitigated.
- Identify impacts to bike facilities and mitigation measures.
- Multiple transit routes utilize the SR 99 northbound on-ramp including King County Metro's Rapid Ride E Line. The impacts to these routes during construction should be evaluated and disclosed. Mitigation measures need to be identified as well as the secondary impacts to general purpose mobility resulting from the identified improvements. Design feasibility of these alternative routes should be reviewed to confirm buses can utilize the routes or if secondary intersection or roadway improvements are needed.
- Local employers operate private shuttles in this area. Sound Transit should coordinate with local employers to identify stop locations and routes, assess impacts, and identify mitigation strategies in coordination with the employers.

- Identify local freight routes impacted by construction related road closures and identify mitigation measures
- Identify on-street and off-street loading areas and parking access points impacted by construction related closures.

### Public safety

The area around the South Lake Union station is home to high-frequency transit routes that are utilized by Seattle Center visitors and major employers in the surrounding area, such as UW Medicine, Meta, Apple, and Amazon. The construction and staging areas analyzed in the Draft EIS should identify impacts to access to the transit facilities in the area and specific mitigation strategies, such as well-lit and continuous pedestrian walkways that eliminate dead zones where pedestrians feel unsafe and thus avoid.

These impacts also need to be analyzed in the context of concurrent and similar impacts at the Seattle Center station where Seattle Center visitors also park or take transit.

### Cumulative impacts

For the South Lake Union station, the following projects should be included in the cumulative impacts: Memorial Stadium redevelopment; Seattle Transportation Levy Projects; Revive I-5; and major private property developments.

### Public and private utilities

The new Draft EIS will be inadequate if it does not analyze the impacts of utility relocations that will close travel lanes, sidewalks, or bicycle lanes for periods greater than six months. Construction of the South Lake Union station at the preferred location requires the re-routing of Seattle City Light's network system along John Street and Eighth Avenue and Sound Transit estimates early utility work could take as long as three years.

## Denny Station

### Transportation

- The construction of the station will take the South Lake Union streetcar off-line for many years; impacts and mitigation of this action need to be identified.
- Evaluate and disclose the impacts due to the anticipated closure of Westlake Avenue and John Street as well as the impacts to Westlake Avenue at the Denny Way intersection.
- North/south vehicle capacity will be impacted due to the closure of Harrison Street as well as the concurrent closure and/or reduction in capacity along Westlake Avenue North. The timelines for these closures should be identified. If a schedule cannot be defined an assumption should be made such that a mitigation plan can be identified in the new Draft EIS. If the construction schedule differs in the future the mitigation measures identified can be reviewed and revised.

- North/south transit capacity and speed and reliability need to be evaluated due to the concurrent construction of the South Lake Union and Westlake stations. Mitigation measures should be identified with an assessment of secondary impacts to general purpose mobility.
- Due to the proximity and anticipated schedule of street closures at the South Lake Union station, the broader circulation impacts to transit and general purpose traffic needs to be assessed. Specific mitigation needs to be identified to offset the impacts of the simultaneous road closures.
- Local employers operate private shuttles in this area. Sound Transit should coordinate with local employers to identify stop locations and routes, assess impacts, and identify mitigation strategies in coordination with the employers.
- Identify impacts to bike facilities and mitigation measures.
- Identify local freight routes impacted by construction related road closures and identify mitigation measures.
- Identify on-street and off-street loading areas and parking access points impacted by construction related closures.

#### Public safety

The area around the Denny station is a high density residential and commercial area with street-level retail that relies on foot traffic. In addition, Denny Park is one of the limited open spaces in the neighborhood and has experienced recent public safety challenges.

The construction and staging areas analyzed in the Draft EIS should identify impacts to public safety in the area and specific mitigation strategies, such as well-lit and continuous pedestrian walkways that eliminate dead zones where pedestrians feel unsafe and thus avoid. Mitigation measures should be included that maintains Denny Park as an open and welcoming space for neighborhood residents to enjoy during construction.

#### Cumulative impacts

For the Denny station, the following projects should be included in the cumulative impacts analysis: Revive I-5; Seattle Transportation Levy Projects; and major private property development.

## Westlake Station

#### Transportation

- North/south and east/west vehicle mobility will be significantly impacted by the concurrent closures and reduction of capacity along Fourth and Fifth avenues and Pine and Pike streets. The timelines for these closures should be identified. If a schedule cannot be defined an assumption should be made such that a mitigation plan be developed. If the construction schedule differs in the future the mitigation measures identified can be reviewed and revised.
- Alternative corridors such as Sixth and Seventh avenues should be evaluated considering the construction-related closures and shifts in traffic that are anticipated.

- North/south transit capacity and speed and reliability need to be evaluated due to the concurrent impact to the roadways surrounding the station site. Mitigation measures should be identified with an assessment of secondary impacts to general purpose mobility.
- Pine and Pike streets are key pedestrian corridors linking the Convention Center, downtown retail core, Pike Place Market, and the waterfront. The connectivity for pedestrians through the construction zone should be reviewed and mitigation measures identified, including restoration of the recently completed Pike-Pine Corridor Renaissance investments. The mitigation should provide at least one continuous route for pedestrians between the Convention Center and Pike Place Market.
- Identify impacts to bike facilities and identify mitigation measures such as impacts to the Pine and Pike Street and Fourth Avenue Bicycle facilities.
- Identify local freight routes impacted by construction related road closures and identify mitigation measures.
- Major investments are anticipated at the Seattle Monorail's Westlake station. The scope and timing of these improvements need to be coordinated with the construction activity.
- Identify on-street and off-street loading areas and parking access points impacted by construction related closures, including customer and product access to retail destinations around the station area such as Nordstrom's flagship store, Westlake Mall, and Pacific Place.

#### Public safety

The Westlake station area serves as the heart of the retail and commercial district and there are high pedestrian, transit – including Sound Transit's existing station – and traffic volumes utilizing Pike and Pine Street to connect to regional destinations such as the Convention Center, Pike Place Market, and shopping, hotels and restaurants.

The construction and staging areas analyzed in the Draft EIS should identify impacts to access to the transit and pedestrian facilities in the area and specific mitigation strategies, such as well-lit and continuous pedestrian walkways that eliminate dead zones where pedestrians feel unsafe and thus avoid. This includes a continuous walkway along Pike and Pine streets, and Fourth and Fifth avenues, during construction.

#### Cumulative impacts

For the Westlake station, the following projects should be included in the cumulative impacts analysis: Revive I-5; the City of Seattle's Westlake Park Reimagined; Seattle Transportation Levy Projects; and major private property developments.

## Midtown Station

### Transportation

- North/south and east/west vehicle mobility will be significantly impacted by the potential concurrent closures and reduction of capacity along 4th Ave, Yesler, and James St. The timelines for these closures should be identified. If a schedule cannot be defined an assumption should be made such that a mitigation plan be developed. If the construction schedule differs in the future the mitigation measures identified can be reviewed.
- Alternative corridors providing access to I-5 and the First Hill area, Cherry Street, and Marion Street should be evaluated.
- Multiple transit routes will be impacted by the station construction. Transit capacity and speed and reliability need to be evaluated considering the overall rerouting created by concurrent station construction and associated roadway closures. Mitigation measures should be identified with an assessment of secondary impacts to general purpose mobility.
- Identify impacts to bike facilities and mitigation measures.
- Identify local freight routes impacted by construction related road closures and identify mitigation measures.
- Identify on-street and off-street loading areas and parking access points impacted by construction related closures.
- Document potential haul routes, truck trips, and timing. The additional traffic needs to be evaluated along with the likely shifts in traffic due to anticipated road closures.

### Public safety

The Midtown Station area is home to a low-income population and services that they and others from around the region rely on. The construction and staging areas analyzed in the Draft EIS should identify impacts to access to these services in the area and specific mitigation strategies, such as well-lit and continuous pedestrian walkways that eliminate dead zones where pedestrians feel unsafe and thus avoid.

### Cumulative impacts

For the Midtown station, the following projects should be included in the cumulative impacts analysis: Revive I-5; Jackson Street Hub; 4<sup>th</sup> Avenue Viaduct Replacement; Second Avenue Extension Rehabilitation; WOSCA site redevelopment; King County's Civic Campus; Seattle Transportation Levy Projects; and major private property developments, such as the full block between Third and Fourth avenues and James and Cherry streets.

## Chinatown-International District Station

### Transportation

- North/south and east/west vehicle mobility will be significantly impacted by the potential concurrent closures and reduction of capacity along Sixth Avenue and Airport Road. The

timelines for these closures should be identified. If a schedule cannot be defined an assumption should be made such that a mitigation plan be developed. If the construction schedule differs in the future the mitigation measures identified can be reviewed and revised.

- Multiple transit routes will be impacted by the station construction. Transit capacity and speed and reliability need to be evaluated considering the overall rerouting created by concurrent station construction and associated roadway closures.
- Identify impacts to bike facilities and mitigation measures
- Identify local freight routes impacted by construction related road closures and identify mitigation measures
- Identify on-street and off-street loading areas and parking access points impacted by construction related closures.
- Document potential haul routes, truck trips, and timing. The additional traffic needs to be evaluated along with the likely shifts in traffic due to the anticipated road closures. This analysis should include a review of the adequacy of the facilities to be used by the trucks.

#### Public Safety

The Chinatown-International District is disproportionately affected by public safety incidents compared to the rest of downtown. A dead zone surrounding the preferred station location, which also experiences high volumes of pedestrian traffic going to and from events at Lumen Field, will create more areas where pedestrians will feel unsafe.

The construction and staging areas analyzed in the Draft EIS should identify impacts to access to services, transit facilities, and the sports stadiums in the area and specific mitigation strategies, such as well-lit and continuous pedestrian walkways that eliminate dead zones where pedestrians feel unsafe and thus avoid.

#### Cumulative impacts

For the Chinatown-International District station, the following projects should be included in the cumulative impacts analysis: Stadium and SODO station construction; interim operations after West Seattle complete; U.S. Coast Guard Base expansion on Terminal 46; Seattle Transportation Levy Projects; Fourth Avenue viaduct replacement; Second Avenue extension rehabilitation and major private property developments.

#### Public and private utilities

The new BLE Draft EIS will be inadequate if it does not analyze the impacts of utility relocations that will close travel lanes, sidewalks, or bicycle lanes for periods greater than six months. The preferred station location at Dearborn Street may require the relocation of a gas line if it is not able to be protected in place. This would necessitate longer traffic lanes or street closures.



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# McCULLOUGH HILL PLLC

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December 6, 2024

VIA EMAIL

Ballard Link Extension, c/o Lauren Swift  
Sound Transit  
401 South Jackson Street  
Seattle, WA 98104  
blescoping@soundtransit.org

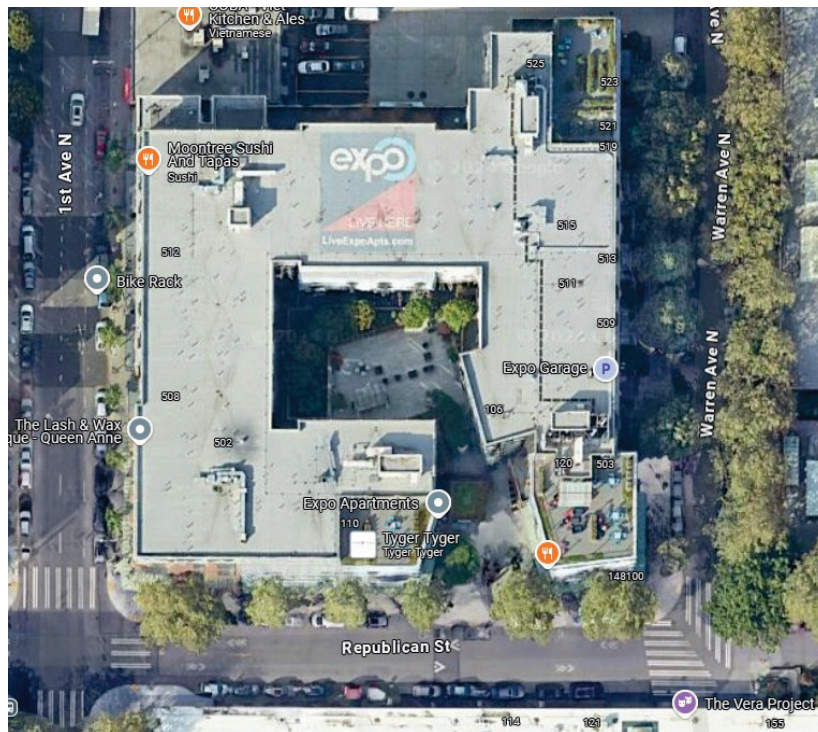
Re: Ballard Link Extension

Scoping of New NEPA Draft EIS and Supplemental SEPA Draft EIS

Dear Ms. Swift:

We represent Essex Queen Anne, LLC (“Essex”), the owner of the property at 118 Republican Street (“Property”), on the corner of Republican Street and Warren Avenue North. This letter provides Essex’s comments on the scoping of Ballard Link Extension Draft EIS (“BLE Draft EIS”).

The Property hosts the Expo Apartments complex, which includes 275 residential units and 30,000 square feet of ground-floor retail uses directly adjacent to the Seattle Center’s Northwest Rooms and August Wilson Way. Here is an aerial image of the Property:



The Expo Apartments' garage is accessed from Warren Avenue North. Essex understands that the Preferred Alternative location for the future Seattle Center Station has been moved west from an earlier proposed location immediately south of the Property, at least partially in response to the concerns of community members. We appreciate Sound Transit's ("ST's") responsiveness to the community's legitimate concerns about the proposed station locations directly adjacent to the Seattle Center raised during the West Seattle Ballard Link Extension Draft EIS ("WSBLE DEIS") process. We hope this type of collaboration remains central throughout the BLE Draft EIS process.

To that end, we request that Sound Transit carry forward the comments from our April 2022 comment letter on the WSBLE DEIS. Beyond those comments, we respectfully submit the following comments to the NEPA scoping phase of the BLE Project.

### **Project Purpose and Need**

Regarding the Project's purpose, we are generally supportive of the following statements directly from ST's webpage for NEPA scoping of the Project:

- "Encourage 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, including Sound Transit's Equitable Transit Oriented Development Policy (Sound Transit 2018) and Sustainability Plan (Sound Transit 2019)."
- "Encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections, consistent with Sound Transit's System Access Policy (Sound Transit 2013)."
- "Preserve and promote a healthy environment and economy by minimizing adverse impacts on the natural, built, and social environments through sustainable practices."

None of these purpose statements mention any aim to preserve existing housing, businesses, or non-motorized access to either existing use. We respectfully ask that either these purpose statements be amended to reflect a desire to preserve the viability of housing and businesses that already exist near the Station's location under each of the Alternatives or to include a new purpose statement that reads "Encourage the retention of existing housing and businesses near station areas through adequate consideration and mitigation of short- and long-term Project impacts on current residents, businesses, and employees."

We offer similarly qualified support for several statements regarding the need for the Project as they are listed on the ST Scoping webpage, specifically:

- "The region's residents and communities, including transit-dependent people, low-income people, and communities of color, need long-term regional mobility and multi-modal connectivity as called for in the Washington State Growth Management Act (Revised Code of Washington 36.70A.108)."

- Regional and local plans call for increased residential and/or employment density at and around high-capacity transit stations and increased options for multi-modal access. VISION 2050 has a goal for 65 percent of the region's population and 75 percent of the region's employment to occur in regional growth centers and within walking distance of transit.

Both of these statements could be interpreted as deemphasizing consideration of existing residents and businesses, which includes maintaining existing vehicular access for residents and businesses' employees, customers and deliveries, in favor of new development and/or multi-modal access. To be clear, we do not believe that ST intends for the Project to ignore the interests and concerns of those who already live and work near the Proposed Station Locations. ST would not have changed the Preferred Station Location if that were the case. However, the Project's current need statements do not reflect this pattern of consideration. To remedy this discrepancy, we ask that the BLE Draft EIS include a need statement to the effect that "All of the Project goals listed here should be pursued with the understanding that preference should be given to retention of existing housing and business, including existing vehicular access for residents, employees, customers and deliveries."

### **Alternatives to be Studied**

We support the adoption of the Preferred Alternative for the Downtown segment of the BLE Project as shown in NEPA scoping documents, including the current Preferred Station Location for the Seattle Center Station.

As the Project proceeds, we strongly urge ST to study only those alternatives that avoid locating the Seattle Center station directly adjacent to the Seattle Center and Expo. Correspondingly, we ask that any Alternatives studied in the BLE Draft EIS include station locations that promote the technical feasibility of locating the Seattle Center Station at the Preferred Alternative Station Location. To that end, we ask ST to exclude the study of any locations for the proposed Denny Station, which would require locating the Seattle Center Station adjacent to the Property.

### **Potential Topics to Study in the EIS**

Construction impacts should be given detailed treatment because of the anticipated duration of construction and its disruption of access. As a general comment, the BLE Draft EIS should be based on construction plans that are sufficiently definite to allow a meaningful assessment of potential impacts. The WSBLE DEIS considered plans that were at less than 5% completion. Such a level is too preliminary to allow a meaningful evaluation of potential impacts. The new DEIS should be based on much more detailed information than that used in the WSBLE DEIS. This more detailed information should include, among other things:

- Depictions of horizontal and vertical control for each alignment alternative
- Information about actual construction methodology that allows one to determine noise, vibration, and earth movement impacts;

- Information on the scope of above-grade construction limits;
- Identification of proposed street closures and their respective durations;
- Identification of proposed pedestrian infrastructure
- Identification of proposed location and duration of construction staging; and
- Complete information on the duration and sequencing of construction activities, as needed for assessing the cumulative impacts of construction work on the urban environment.

In addition to addressing these concerns about the general level of informational detail considered by the BLE Draft EIS, the BLE Draft EIS should include study of potential impacts related to the following topics.

1. Acquisitions, displacement, and relocation – Besides considering direct Project impacts related to acquisitions, displacement, and relocation of current property owners and tenants, the BLE DEIS should consider the secondary economic effects of any proposed Alternatives.
2. Construction – The BLE Draft EIS must adequately analyze the Project's construction impacts, particularly those related to noise, vibration, light, glare, and dust. The BLE Draft EIS should identify, analyze, and compare such impacts as they apply to possible construction methods, including underground boring and cut-and-cover tunneling techniques. The BLE Draft EIS should include performance standards and specific mitigation measures to ensure the Project meets them. Such mitigation measures could include, for example, sound level monitoring at residences, time limitations on construction that may impact sensitive residential uses, installation of sound barriers, limits on using specific equipment and construction methods to reduce vibration, and pre- and post-construction evaluation of property conditions. We urge ST to provide performance standards at the Draft EIS phase of review to allow for the full development of mitigation measures as early as possible.
3. Future Phased Review - Alternatively, if ST cannot provide information sufficiently detailed to determine such performance standards, the Draft EIS should include provisions to ensure future phased review of the Project. It is unclear if ST considers the BLE Draft EIS a project action EIS or an early programmatic EIS that anticipates the need for future SEPA review. The BLE Draft EIS should include detailed information regarding all adverse impacts if it is the former. If the BLE Draft EIS is the latter, it should expressly state so.
4. Transportation and Neighborhood Accessibility – The BLE Draft EIS should provide complete information on the timing, duration, and location of possible street closures associated with the Project. Documents from the WSBLE DEIS indicated that some

neighborhood streets might be closed for five years or longer. Such street closures can result in significant adverse impacts. Loss of access to on-site parking and loading facilities could force entire buildings to shut down in the short term. Long-term impediments to accessing homes and businesses will result in significant adverse impacts, particularly for buildings like Expo, where customer and loading access is critical to the survival of street-level retailers and restaurants. Similarly, maintaining continuous access to Expo's 329 on-site parking spaces is essential to serving Expo's residential and commercial tenants. Given the amount of environmental review that has already been conducted related to potential locations for the Seattle Center Station, it is reasonable, indeed critical, that the BLE Draft EIS include detailed information identifying potential significant adverse impacts related to neighborhood accessibility.

5. Land use – The BLE Draft EIS must adequately analyze and disclose the significant adverse short- and long-term impacts that the Project will have on current and potential future uses, including the residential and commercial uses in Expo, due to the lengthy and disruptive construction period as well as any potential future long-term reduction of vehicular and delivery access. Expo has 9 retail and restaurant tenants that contribute to the Uptown neighborhood's general vitality and comprise a substantial portion of the surrounding area's commercial uses. Failure to successfully study and mitigate the Project's impacts on these vital businesses could result in the businesses' permanent shuttering and accompanying COVID-style blight throughout the station area. Such a scenario would undermine the City's ability to achieve its land use goals and should thus be studied in the BLE Draft EIS. Study of the Project's land use impacts should include the identification of mitigation measures sufficient to reduce the impacts below significant levels.

### **Conclusion**

We respectfully request that the BLE Draft EIS continue to study the Preferred Station Location and exclude the study of any Alternatives that would prevent the Seattle Center Station from being there. Additionally, we request that the BLE Draft EIS adequately disclose the Project's impacts in the Seattle Center vicinity to allow for full analysis of Alternatives and the earliest possible identification of potential mitigation measures. Expo's unique mix of residential and commercial uses makes it particularly sensitive to a variety of potential Project impacts. Along with its own distinct concerns, Essex shares many of those previously voiced by other neighborhood stakeholders, including the Uptown Alliance, the Seattle Center Foundation, and a host of arts organizations located within the Seattle Center. As such, Essex incorporates by reference the prior comments by these stakeholders that relate the preferred location of the Seattle Center Station, route alignment alternatives, and the need for study of Project impacts including, but not limited to, displacement, construction, economic effect, long-term neighborhood accessibility, land use, and early identification of measures to mitigate Project impacts.

Thank you for considering these comments.

December 6, 2024  
Page 6

Sincerely,

Courtney A. Kaylor

cc: Client





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December 8, 2024

Ballard Link Extension Scoping Comments  
C/O Lauren Swift  
Sound Transit  
401 S Jackson St  
Seattle, WA 98104

**RE: Scope for the Draft Environmental Impact Statement for the Ballard Link Extension Project**

Dear Ms. Swift

International Community Health Services (ICHS) is writing in regards to the scoping period for the Ballard Link Extension (BLE) issued by Sound Transit. We appreciate the opportunity to submit input on the scope of the environmental impact study for this project. Our comments here will be primarily focused on the project segment related to the Chinatown International District (CID) and Pioneer Square (PSQ).

ICHS supports expanded transportation opportunities for the CID and PSQ and is convinced of both the need for and benefit from a regional transit hub serving these neighborhoods. Achieving these goals, however, will require thoughtful and deliberate analysis through both environmental health and racial equity lenses. We ask Sound Transit to include the following three broad areas in their environmental analysis of the BLE project:

1. Use the positive aspects of 4th Avenue S station location to inform the analysis of potential alternatives, regardless of the final selection;
2. Do not consider 5th Avenue S as a station option; and
3. More study of connectivity opportunities between Dearborn St station and the existing CID station.

**About International Community Health Services**

Established in 1973, ICHS is a Federally Qualified Health Center (FQHC) that offers comprehensive, culturally and linguistically appropriate health and wellness services across the Puget Sound region. Deeply rooted in the Asian American, Native Hawaiian and other Pacific Islander (AANHPI) communities, ICHS offers medical, dental, behavioral health, nutrition, acupuncture, senior services, and enabling services at four full-service and seven satellite sites. We provide these services to everyone, regardless of an individual’s insurance status or ability to pay.

Seattle’s Chinatown International District (CID) is home to our flagship International District Medical and Dental Clinic (ID Clinic); assisted living facility Legacy House; and senior care Healthy Aging and Wellness Program



(HAWP). However, our physical locations stretch from Shoreline to Auburn, and over one in ten patients are from outside King County. We offer services, such as our Vision Clinic and acupuncture, only at our ID Clinic.

ICHS served over 31,000 patients in 2023, including 10,575 at ID Clinic, our largest site by patient volume. Approximately four out of every five patients are low-income (200% of the Federal Poverty Level), 77% identify as Black, Indigenous, and People of Color (BIPOC), 66% of whom identify as AANHPI. About 20% of patients are seniors over age 65, and 20% of our patients are on Medicare or dual-eligible for Medicare and Medicaid. Linguistic and cultural competence are at the core of ICHS services.

Elder care is a significant business line, and the CID is home to our suite of senior service. ICHS operates senior programs which include assisted living, an adult day health center, a congregate meal program, and a Medicaid/Medicare Program of All-Inclusive Care for the Elderly (PACE) — all programs which provide a continuum of care for seniors age 65 and older. PACE is targeted for the frailest seniors who qualify for nursing home care to help them stay at home or in the community through comprehensive health, socialization, transportation and home care services from ICHS. Both HAWP and PACE operate out of Legacy House in the CID, anchoring our senior care and the elders we serve in this neighborhood.

### **Reviewing Our Comments for the 2022 West Seattle-Ballard Link Extension Draft Environmental Impact Statement**

ICHS raised a number of questions and concerns in the 2022 West Seattle-Ballard Link Extension (WSBLE) Draft Environmental Impact Statement (DEIS). To the extent that Sound Transit has already addressed them in the intervening years, ICHS appreciates this work. Our 2022 DEIS comments are summarized here.

The CID has historically shouldered inequitable burdens from major capital projects, including the I-5 overpass, Kingdome, and First Hill Streetcar, which ICHS believed were not adequately addressed in the DEIS. The long list of such laws and projects led us to believe Sound Transit must do more than stated in the DEIS to prevent history from repeating itself. ICHS raised concerns that the full scope of likely impacts to the CID from the 5th Avenue alternatives were not fully addressed. We believed that the DEIS did not adequately account for how the 5th Avenue alternatives could disrupt the neighborhood beyond the projected business displacements. We also worried that temporary King County Metro relocations had the potential to disrupt ICHS business operations and patient services. Other concerns included that surface noise and visual assessments were not conducted for the CID segment in the DEIS. Finally, during the 2022 DEIS, the CID was in the midst of two public health crises: COVID-19 and anti-Asian racism. Both have tested the neighborhood's resiliency and neither were considered when the DEIS was drafted.

### **Scope of the BLE DEIS**

ICHS understands that Sound Transit is soliciting feedback on three areas: project purpose and need, alternatives, and potential topics to be studied in the BLE Draft Environmental Impact

Statement (DEIS). We agree in principle with Sound Transit’s stated project purpose and need, as we support expanding regional mass transit and equitable access to transportation. Our comments here focus on the alternatives and potential topics to be studied in the EIS and potential topics for study in the DEIS.

### **Alternatives to be Studied in the DEIS**

ICHS has previously expressed concerns about Sound Transit’s preferred alternative of Dearborn Street and Midtown/James Street stations (formerly “South of CID” and “North of CID” stations, respectively) and a preference for a 4th Avenue shallower station. Regardless of which alignment Sound Transit ultimately chooses, there are a number of factors the agency should consider to inform their final station selection.

Sound Transit recently completed further studies on the 4th Avenue shallower alignment. This alternative has been found to be a costly and long-lasting construction project with more logistical complications than are believed to exist for Dearborn Street or 5th Avenue shallow diagonal alternatives. The agency also found options for reducing time, cost, and impact to varying degrees and in varying combinations. Sound Transit should continue to study these options for 4th Avenue shallower. We understand the reasons Sound Transit believes 4th Avenue shallower to be unbuildable, even if we do not entirely agree with how these conclusions were drawn.

The 4th Avenue station had significant support from across the CID and PSQ. Nonprofits, businesses, family associations, community development authorities, and individual residents have expressed their support for this station for years. This is in large part due to the potential for regional connectivity and easier access to all forms of transit. Even if it is not selected as the final station location, fully understanding the appeal of this alternative will still inform Sound Transit’s design and construction of the one it does select. **We request that Sound Transit continue to study 4th Avenue to look for opportunities to improve construction duration drivers, and to apply as much as possible the benefits of 4th Avenue to the final selected station.**

The 5th Avenue shallow diagonal alignment remains unbuildable. The same concerns raised by the CID community over the last several years still remain. Chief among them is that Sound Transit has not, and perhaps cannot, find ways to limit the station’s construction footprint in the heart of the neighborhood. As currently proposed, the station would sit between 5th and 6th Avenues, and Weller and King Streets. There is simply no way that construction of this station and tunnel would not result in significant disruption to CID residents, businesses, and visitors.

More recently the neighborhood has suffered under the twin epidemics of COVID-19 and anti-Asian violence. They combined in the worst possible way, and the neighborhood still feels the effects of the anti-Asian xenophobia that was used to justify responses to the pandemic. A multi-year major construction project in the heart of the CID that would displace businesses and residents is completely unacceptable if the neighborhood is to survive. **ICHS strongly urges Sound Transit not to move forward with 5th Avenue alternatives**, but requests that the agency consider applying any lessons or positive effects anticipated to the final station location.

ICHS still has concerns about the Dearborn Street station. Chief among these are accessibility and connectivity. However, we recognize that Sound Transit selected Dearborn St. station as the preferred alternative, and want to work with the agency to strengthen the station as much as possible so that it provides the greatest benefit to the CID. Part of the BLE project's purpose is to "expand mobility for the corridor and the region's residents." This cannot be accomplished without maximizing accessibility to the Dearborn Street station by CID residents and transit users making connections from the existing CID station. Addressing connectivity concerns would alleviate many other challenges associated with Dearborn St. station. Solutions such as an underground pedestrian tunnel connecting the current CID station with the Dearborn Street station, movable walkways above or underground between the stations, and other more easily accessible pedestrian connections between the two stations would significantly improve accessibility and connectivity for neighborhood residents and riders. **ICHS requests that Sound Transit study ways to improve connectivity between the existing CID station and the Dearborn Street station.**

### **Potential Topics to be Studied in the DEIS**

ICHS urges Sound Transit to include the topics listed above regarding the 2022 WSBLE DEIS to be included for analysis in the forthcoming BLE DEIS. We also ask that the agency consider the following issues and questions in their analysis.

Permitting approvals: Sound Transit is not the only agency that will be involved in station and tunnel construction. Any construction of new station(s) and tunnels will require coordination of right-of-way, construction, and other permits, with needs evolving over time. **Sound Transit must have a comprehensive plan for how it and other agencies will make permitting decisions, and there must be a place for community involvement in that decision-making process.** For example, haul road and traffic reroutes for the Dearborn Street station could have very concrete impacts to the CID, even if the station itself does not extend north of Dearborn Street.

Noise and vibration analysis: In the 2022 DEIS, ICCHS urged Sound Transit to conduct surface noise and vibration analyses for the CID, even though the neighborhood's zoning technically allowed for the environmental review to proceed without it. We maintain that this perspective allows Sound Transit to avoid responsibility for impacts to the community in opposition to the agency's aims with the Racial Equity Tool (RET). **Sound Transit must conduct noise and vibration analysis in the CID for all alternatives being studied.** To not conduct an analysis because the agency has the option to do so, but is not legally required, would not allow it to "critically examine whom a decision will benefit or burden, identify potential unintended consequences and make decision-makers aware of these potential outcomes in advance."

Sound Transit acknowledges in its RET analysis of the BLE CID additional study results and South Downtown Hub progress presentation to the Sound Transit System Expansion Committee on November 14, 2024 that there are a "multitude of past harms inflicted on the community from past infrastructure projects and policies that have ongoing effects today," and that the community desires to "collectively address remaining questions, minimize potential impacts and maximize

community benefits, whether as part of design, through mitigation approaches, or as part of broader partnerships.” Not conducting environmental studies such as noise and vibration impacts merely because they are not legally required dismisses the very conclusions Sound Transit reached in its RET work.

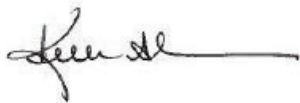
Cost comparisons: Regardless of which station alignment is ultimately selected, **Sound Transit should not continue to use 5th Avenue as the baseline for cost comparisons.** Although this station alignment is still being considered through the 5th Avenue Shallow Diagonal alternative, it was not selected as the preferred alternative nor for additional study. Estimated cost overruns attributed to the 4th Avenue station in particular are at least partly influenced by the delays in publishing a final EIS and selecting a final alternative. Without revised estimates for 5th Avenue and Dearborn Street that reflect current costs, accurate comparisons cannot be made. Until such updated cost data is available, 5th Avenue should not be used as the baseline.

DEIS comment period: **ICHS asks that Sound Transit issue an extended comment period for the DEIS.** This will ensure the community has sufficient time to consider the analysis and proposals the agency puts forward. In particular, because this will be the first DEIS opportunity for us to evaluate the full impact from the Dearborn Street station, extra time must be allowed.

## **Conclusion**

ICHS urges Sound Transit to take these factors into consideration when determining what to study in the BLE DEIS to be issued in 2025. Please do not hesitate to contact us with any questions.

Sincerely,



Kelli Nomura  
Chief Executive Officer  
International Community Health Services

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## Sound Transit Projects - Communications (1 Total)

**Search Term**

556347

**Communication ID: 556347 - Keller Supply Company BLE Scoping Comment**

Communication ( 11/5/2024 )

Keller Supply Company BLE Scoping Comment

Hello,

Thank you for the opportunity to provide comment on the Ballard extension. I represent Keller Supply Company, which is located at 3209 17th Ave W. Keller Supply, the 19th largest private company headquartered in Washington State, has occupied the warehouse building on the property since approximately 1955, and the office building, used as its corporate national headquarters, since approximately 1974. Keller Supply employs approximately 100 people at this location. Our understanding is the current preferred alternative route for the Ballard link extension places a station directly on the western portion of our property, and will likely result in the company being required to permanently vacate the property and relocate elsewhere. For obvious reasons, we strongly oppose the current preferred alternative and would encourage Sound Transit to select one of the alternative routes that would not impact our property directly. It will be extremely difficult, if not impossible, for us to locate a replacement property for our current warehouse building in the same general vicinity, due to our requirement for access/loading for large semi-trucks, and due to our requirement for a significant amount of outside storage. It is conceivable we will not be able to find a satisfactory replacement property and will be forced to cease operations and rely on our nearest location in Lynnwood to serve the north Seattle area. The negative business displacement impacts that will be felt as a result of locating the station on our property are difficult to quantify at this moment in time, but will undoubtedly be substantial. Thank you again for the opportunity to provide comment. We will be anxiously awaiting future updates.

Regards,  
Scott Sulman

**Owner(s):**

Contact ID	Name	Type	Phones	Email
<a href="#">909987</a>	<a href="#">Keller Supply Company</a>	Organization	+1 (206) 285-3800	
<a href="#">1092765</a>	<a href="#">Scott Sulman</a>	Individual		<a href="mailto:scottsulman@gmail.com">scottsulman@gmail.com</a>

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# NORDSTROM

December 9, 2024

***Via electronic mail***

Ballard Link Extension  
Attn: Lauren Swift  
Sound Transit  
401 S. Jackson St.  
Seattle, WA 98104

***Re: Ballard Link Extension – NEPA Scoping Comments***

Dear Ms. Swift:

Nordstrom has been a part of the downtown Seattle business community since our founding in 1901. Throughout that time, we have called Seattle our home. We are proud of our Pacific Northwest heritage and are consistent champions of our local business community. For that reason, we support the stated goals of the Ballard Link Extension (BLE). Expanded mass transit in the Seattle metro area is something that we believe will benefit the entire region. Nevertheless, we write today to express concern.

The stated aim of the BLE is to provide “fast, reliable light rail connections to dense residential and job centers in the Chinatown-International District (CID), Downtown, Interbay, and Ballard neighborhoods.” This is a laudable goal. But to be successful, it must be completed without harming the very neighborhoods it seeks to serve. Put another way, if disruption caused by the construction of the BLE results in the failure or departure of local businesses from the communities intended to be served by the BLE, then the project will have failed and the region will have been harmed as a result.

While we are concerned about the impact of the BLE project on the health of the entire region, let us address here some very specific concerns based on the proposed alternatives at the Westlake Station. As we are informed, construction of Alternative DT-1 would require street closures of six-years’ duration on Pine Street between 4<sup>th</sup> and 5<sup>th</sup>, Pike Street between 4<sup>th</sup> and 5<sup>th</sup>, and 5<sup>th</sup> Avenue between Union and Pine, and a closure of two-years’ duration on 4<sup>th</sup> between Pine and Olive. This will fundamentally impair the movement of people and goods, making it far less likely that consumers will choose to visit the area. For retail businesses like us, that rely on consumers visiting stores in order to exist, the impact of such a disruption would be catastrophic.

This type of disruption is difficult at any time and any point in an economic cycle. But it is especially dangerous when the local economy is already under strain. Since 2020 and the COVID-19 pandemic, Seattle has witnessed numerous retailers close their doors. Some failed outright and fell into bankruptcy. Others remain vibrant businesses but made the entirely sensible decision to leave Downtown in light of challenges operating in the core. Indeed, as of the writing of this letter we are one of only a small handful of retailers of scale that have maintained a presence Downtown. But if Sound Transit chooses to proceed with either Alternative DT-1 or Alternative DT-2, we will be forced to consider whether we can in good conscience continue to operate Downtown.



Ms. Lauren Swift  
December 9, 2024  
Page 2

Allow me to share an uncomfortable economic fact. Total sales for our flagship Nordstrom store and the adjacent Nordstrom Rack are down approximately 37% when compared to pre-pandemic levels. Our business model has not declined since the pandemic. The products and services we offer did not decline. In fact, our customer offering in many respects *improved* during that time and the recovery of our stores in our best markets have rebounded far more quickly and are now back to or even surpassing pre-pandemic levels. Unfortunately, the primary driver for the decline in our Seattle-based business has been something largely outside of our control: the tremendous reduction in Downtown consumer traffic.

Customers have been slow to return to Seattle post-pandemic; as a community, we need to entice them back. The city and its businesses are working hard to do just that, and there are signs that those efforts are working, such as hotel bookings Downtown now returning to pre-pandemic levels. But office workers are not yet back in full, commercial real estate vacancies remain high, and visits to Downtown by people who live within 10 miles of the core are still below pre-pandemic levels. If we make it nearly impossible for customers to visit Downtown then we are telling them to stay away. And they will do so – understandably choosing to shop in suburban locations rather than returning to Downtown. But this is precisely what we predict will happen under DT-1 or DT-2. The contemplated street closures and other disruptions will make it nearly impossible for customers to visit the Westlake area – and so they won't.

We anticipate that the proposed disruptions to the Westlake area – under either alternative DT-1 or DT-2, will result in sufficient sales losses to require us to consider closing both our flagship Nordstrom store and our adjacent Nordstrom Rack store. This is not bluster. We have a fiduciary duty to our shareholders to run profitable stores – and if customer traffic falls below certain minimum levels then it will almost certainly render these stores unprofitable.

If we are forced to shutter these two stores it will be a sad chapter in our Company's long and storied relationship with Seattle. But it will also be a tremendous blow to the local economy. Together, these stores generate average annual sales of roughly \$180 million. When we consider expected lost sales from the closure of the two stores for the duration of the disruption and the likely time period necessary to bring customers back to our Downtown locations once those disruptions are complete, we anticipate lost sales of approximately \$1.6 billion. Moreover, our two stores employ several hundred people and serve as magnets to help draw consumers downtown, where they spend their dollars not only in our stores but at other local retailers as well as restaurants and theaters and hotels and museums – all contributing to the continued recovery of our Downtown core and the generation of meaningful tax revenues for the city and the region.

Of course we don't simply have stores in the Westlake area, it is also the home of our corporate campus where we employ over 2,000 individuals – the vast majority of whom commute to work from outside the Downtown. Echoing the experience seen at several other companies, many of our employees have been reluctant to return to office. Our mandate to employees to return to our campus has been fueled not only by our view that we are at our best when we work collaboratively – but also by our belief that by bringing employees back to the office we are contributing to the recovery of Downtown.

Ms. Lauren Swift  
December 9, 2024  
Page 3

If the disruptions to the Westlake area occur as currently planned and we are forced to shutter our stores in the area, we believe it will be more difficult to attract and retain employees to work in our corporate campus – and so will need to consider whether we should continue to push forward in bringing our employees back or allow them to once again work from home, or perhaps even relocate our corporate campus to elsewhere within the Seattle metro region. Should this happen, it will be yet another blow to the nascent recovery of our once-thriving local business community, an outcome we all wish to avoid.

In closing, let me reiterate that we believe the goal of the BLE is a good one. We are supportive of increased mass transit in the area and we recognize that if we wait for a convenient time to build it the project will never begin. But we also believe that when the voters approved this project they wanted it built in a way that would not imperil the economic viability of Downtown. Put simply, they did not want to have Sound Transit build them a rail line that would connect to a Downtown filled with empty storefronts and shuttered restaurants. Under the proposed alternatives for the Westlake area, we fear that is exactly what will occur. We urge you to go back to the drawing board and consider whether it is even necessary to expand Westlake Station to accommodate the BLE and, if you believe it is necessary, to give additional consideration to where that expansion should occur.

Sincerely,



Erik B. Nordstrom  
CEO, Nordstrom, Inc.

cc: Hon. Bruce Harrell  
Executive Dow Constantine  
Rachel Smith, Seattle Metro Chamber of Commerce  
Jon Scholes, Downtown Seattle Association  
Hon. Christine Gregoire, Challenge Seattle

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**To:** Lauren Swift via blescoping@soundtransit.org  
**From:** Erin Goodman, Executive Director  
**Date:** 9 December 2024  
**RE: Ballard Link Extension Scoping Letter**

The SODO Business Improvement Area (BIA) was formed in 2013 to enhance the district's safety, cleanliness, mobility and to provide a voice for the more than 1,200 businesses and 47,000 employees working in this area. SODO is a district in transition, with a new generation of manufacturing, logistics, commercial and retail businesses emerging. SODO businesses rely on effective and reliable surface street operations for all travel modes, including freight and transit.

Since 2017, the SODO BIA has actively worked to educate Sound Transit on how SODO's unique, industrial ecosystem operates and to ensure the district's needs are met during the planning, construction, and operation of the light rail expansion. Throughout the EIS (environmental impact statement) process for the West Seattle Link Extension project, the SODO BIA was clear with staff that the stakes of building light rail through Seattle's industrial heart are high but not insurmountable, and the BIA recognized and acted upon the critical need to familiarize decisionmakers with what was at risk if the light rail expansion is insensitive to SODO's operations. More specifically, the BIA participated in the EIS scoping, regularly hosted public engagement events for Sound Transit, provided tours for Sound Transit board members and staff, and submitted technical questions and comments on the Draft EIS for the West Seattle Link Extension project. The original scoping letter sent to Sound Transit by the SODO BIA in 2019 for the West Seattle/Ballard Link Extension DEIS is included in **Attachment A**.

The West Seattle Link Extension Final EIS was published in September 2024 and clearly demonstrated that the BIA's efforts and concerns were primarily ignored. In response to the Final EIS, the SODO BIA provided Sound Transit with a letter dated October 18, 2024, reiterating concerns with the potentially significant impacts to SODO. The BIA greatly appreciates the amendment Sound Transit's Board of Directors passed when selecting the West Seattle Link Extension to be built. In the weeks after the amendment passed, Sound Transit staff reached out to the BIA and organized several engagements in an effort to reset our working relationship, and we look forward to continuing to collaborate with Sound Transit staff in the future. It is with this collaborative spirit that we share the following concerns regarding the Ballard Link Extension, and we request Sound Transit's thoughtful consideration of these matters when scoping the new EIS process.

#### **Scoping Items for Consideration – Ballard Link Extension Draft**

***Sequencing and Construction Impacts*** – the West Seattle and Ballard Link Extension projects will require extensive changes and closures to 4<sup>th</sup> Avenue S, 6<sup>th</sup> Avenue S, the SODO Busway, S Holgate Street, and S Lander Street. While potential timing is highlighted for some individual elements of construction on these roadways in the Final EIS for the West Seattle Link Extension, there was little consideration to sequencing these changes to reduce the impacts to businesses, maintaining functionality in the district, or integrating the two projects. All modes of transportation are expected to feel the impact of these closures, especially freight and transit as key connectors lose functionality throughout the life of the projects and beyond. The Ballard Link Extension EIS should also identify impacts and mitigation to pedestrian facilities with the

goal of providing safe, convenient experiences during and after construction. Additionally, the EIS should identify freight impacts during construction along the heavy truck corridors, including but not limited to providing anticipated truck volumes specifically generated by the Ballard Link's tunneling operations.

**Construction Timeline** – the Draft EIS should clearly identify the construction timeline for the Ballard Link Extension, how the project may impact the construction timeline for the West Seattle Link Extension, and what elements of the EIS process need to be done prior to construction of the Ballard Link Extension (i.e., what percent of design needs to be complete for Final EIS).

**Rezoning and Rerouting Impacts** – the Draft EIS should clearly state how zoning changes may impact traffic demands in SODO and should identify any rerouting of traffic required during and after construction.

**Connecting to West Seattle Link Extension** – the Draft EIS should clearly identify how the Ballard Link Extension will connect to the West Seattle Link Extension. Several project elements, such as the SODO Busway and the SODO Trail, do not fit neatly into the Ballard Link Extension or the West Seattle Link Extension. Sound Transit should provide the necessary information to properly understand the impacts to elements that transcend both projects, including but not limited to the SODO Trail relocation, SODO Busway closure, the location of the future tunnel, how tunnel construction will occur, and plans for S Holgate Street.

**Impacts to Other Major Development Projects** – the Draft EIS should clearly identify how the Ballard Link Extension may impact and be impacted by other major development projects, and how coordination with these projects will be managed by Sound Transit. This includes such projects as the new King County Civic Campus in SODO, the expansion of Amtrak's maintenance and operations facility, the U.S. Coast Guard's Expansion and Modernization of Base Seattle project, and a potential street vacation on S Holgate Street.

**Interagency Coordination and Inclusion of the SODO BIA** – interagency coordination should be implemented under the Ballard Link Extension Draft EIS to address utility relocation, transit accessibility, SODO Trail relocation, tunnel planning and dirt hauling, general mitigation, and stadium event coordination. The SODO BIA respectfully requests that Sound Transit directly include our representatives during this process as we act as a conduit between hundreds of businesses, property owners, and other constituents in our membership on a host of transportation, public infrastructure, utility, land use, and other maintenance matters with these existing agencies.

**Multimodal Connectivity** – the Draft EIS project alternatives should provide safe, efficient and reliable access to light rail facilities from all quadrants of SODO. A full analysis of multimodal access needs should consider the complete Link route from the SODO light rail station to the stadium facilities between 1<sup>st</sup> Avenue S to the west and Airport Way S to the east, at a minimum, in order to identify these impacts and needs.

**SODO Busway Impacts** – the Draft EIS should study impacts to freight and transit mobility caused by the closing of the SODO Busway. While a part of the West Seattle Link Extension mitigation plans, the impacts of the Busway's closure were not previously explored, and the Busway extends into the Ballard Link Extension project corridor. The current use of the SODO Busway for bus movements through SODO is a critical element of the overall mobility for freight and people in Seattle, and permanently closing the SODO

Busway with the proposed Link Light Rail extensions will trigger a full rework of 4<sup>th</sup> Avenue S between S Spokane Street and S Holgate Street. It is critical to identify a feasible mitigation strategy for SODO Busway closure impacts as part of the Ballard Link Extension environmental review that does not trigger direct impacts to mobility or harm nearby businesses. Additionally, use of the SODO Busway for this light rail extension must be identified as an impact to SODO district businesses and to King County Metro operations.

**Station Connections to Stadium** – the Draft EIS should discuss improvements to the existing Stadium Station and provide plans to increase safe connections to the proposed CID station(s). Additionally, the Draft EIS should identify improvements required to provide safe connections from the CID South and Stadium stations to each stadium (e.g., wayfinding, lighting, infrastructure etc.).

**Station Facilities** – the Draft EIS project alternatives should consider what facilities are needed at the Stadium and/or CID stations for pick up and drop off activities, what facilities would accommodate local transit and circulation routing, and how this project will provide for local bus layover. Layover and transit connections should not impact adjacent businesses or operation. This will need to be accommodated outside of the public right of way, in order to provide for loading and waiting activities.

**Station Transfers** – the Draft EIS analysis should evaluate passenger Link transfer needs wherever they are proposed and enhance existing/proposed station areas to accommodate these transfer needs in combination with weather protection and large event passenger demands. The Draft EIS should evaluate how new transfer locations may impact the West Seattle Link Extension or other stations and identify mitigation, if applicable.

**Parking** – the Draft EIS project alternatives should address “Hide and Ride” Parking Impacts. This plan must study the impact of on-street parking near the Stadium station. Currently we see significant impact from link riders that use SODO surface parking to access the light rail for other destinations because parking is free and untimed. Parking should remain available for accommodating local businesses’ patrons and employees who rely on the existing street and right-of-way parking and road access near the Stadium station.

**Circulation** – the Draft EIS project alternatives must identify impacts to SODO travel, circulation, businesses and employees. SODO relies on reliable and efficient truck circulation and any impacts on freight will impact businesses and community livelihood.

Please ensure that these issues are fully addressed in the environmental review of the proposed Ballard Link Extension project. These issues of mobility in all travel modes are critical to SODO businesses and very important to the SODO BIA.

Sincerely,



Erin Goodman  
Executive Director

# Attachment A

206-294-3285  
www.sodoseattle.org



270 S Hanford St, Suite 112  
Seattle, WA 98134

April 2, 2019

West Seattle and Ballard Link Extensions  
c/o Lauren Swift, Sound Transit  
401 S Jackson St.  
Seattle, WA 98104

Dear Ms. Swift:

The SODO Business Improvement Area (BIA) was formed in 2013 to enhance the district's safety, cleanliness, mobility and to provide a voice for the more than 1200 businesses and 47,000 employees working in this area. SODO is a district in transition, with a new generation of manufacturing, logistics, commercial and retail businesses emerging. SODO businesses rely on effective and reliable surface street operations for all travel modes, including trucks and buses. The SODO BIA supports a light rail station with an alignment which delivers light rail service with the least impact on businesses, freight, and overall mobility within SODO.

**Study Impact to freight and mobility of closing E3 Busway** SODO is home to the Ryerson/Atlantic/Central Bases for King County Metro operations which deliver huge bus service both within Seattle and supporting the region. The current and continued use of the E-3 Busway for bus movements through SODO is a critical element of the overall mobility for freight and people in SODO. While the E-3 Busway appears to be an attractive public resource available to Sound Transit for trackway expansion, it is also the vital link for regional bus service delivery through SODO. Any compromise to that facility for bus service would relocate buses to the surface streets in SODO and compromise surface street operations for truck freight movements and overall mobility in SODO.

Use of the E-3 Busway for this light rail extension must be identified as an impact to the SODO district businesses and to King County Metro operations – for which mitigation must be identified and provided. Any alternative which would displace buses from the E-3 Busway would have significant impacts on SODO surface street operations and circulation for both trucks and buses – which are both critical to SODO business and neighborhood vitality. The environmental analysis must fully explore the alternatives to using the E3 Busway and fully reflect these potential impacts to freight movement and people movement via local buses.

**Increase mobility within SODO** SODO relies on effectively getting employees to and from work and accessibility to light rail is key for business growth in SODO. How will the project alternatives provide safe, effective and reliable access to light rail from all quadrants of SODO?

Link light rail must be accessible by all who work in SODO – accessible by foot, by bike, by transit connection and by other delivery means. Link stations must be accessible, safe and reliable throughout the service day – for all travelers. Station design needs to provide shelter for all time periods, and all weather conditions. Existing station amenities are minimal and insufficient for the anticipated demand. Future stations must provide for bicycle parking, local transit connections, pick up and drop off functions to ensure that all travel modes can access light rail at each station.

Pedestrian safety is paramount for access to and from the proposed light rail stations. This needs to be considered for the SODO and the Stadium stations – where high volumes of riders will access the station. A full analysis of access needs



# Attachment A

will consider the full route from the light rail station to the stadium facilities and to 1<sup>st</sup> Ave South on the west and to Airport Way on the east, at a minimum, in order to identify and mitigate pedestrian impacts.

What facilities will be in place at SODO and Stadium stations for pick up and drop off activities? What facilities will accommodate local transit and circulation routing? How will this project provide for local bus layover? Layover and transit connections should not impact adjacent businesses or operation. This will need to be accommodated outside of the public right of way, in order to provide for loading and waiting activities.

**Address “Hide and Ride” Parking Impacts** This plan must study on-street parking impacts near the stations. Currently we see significant impact from link riders that use SODO surface parking to access the light rail for other destinations. Parking should remain available for accommodating local businesses’ patrons and employees who rely on the existing street and right of way parking and road access near the SODO and Stadium stations.

**Study Impacts of North or South Duwamish Crossings on Existing SODO Businesses** Light rail alignment impacts must be identified and mitigated for intersections and businesses in SODO affected by column placement. There are currently two choices for crossing the Duwamish and they appear to have significantly different impacts on SODO. A full study on the business displacement and traffic impacts from the two alignment tracks and the accessory bridges to access to the Operations and Maintenance Facility needs to be studied to understand the disparate impacts on SODO

**Summary** Implementation of Link to West Seattle and through SODO to Downtown and Ballard must consider impacts to SODO travel, circulation, businesses and employees – which includes both light rail alignment impacts to property plus alignment side effects such as the closing of the E3 Busway to buses – and the rerouting of buses to the surface streets. SODO relies on reliable and efficient truck circulation and any impacts on freight will impact businesses and community livelihood

Please ensure that these issues are fully addressed in the environmental review of the proposed light rail extension from West Seattle to Downtown through SODO, and from SODO through Downtown to Ballard. These issues of mobility in all travel modes are critical to SODO businesses and very important to the SODO BIA.

Sincerely,



Erin Goodman

Executive Director, SODO Business Improvement Area



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Ballard Link Extension  
Attn: Lauren Swift, Sound Transit  
401 S. Jackson Street  
Seattle, WA 98104

blescoping@soundtransit.org

December 6, 2024

**Re: Scoping Comments for the Ballard Light Rail Extension's Second Draft Environmental Impact Statement**

Dear Ms. Swift,

This comment letter is submitted on behalf of Vulcan Real Estate to provide feedback during the scoping period for the revised Ballard Link Extension (the "BLE") Draft Environmental Impact Statement ("DEIS"). Vulcan Real Estate owns properties in downtown Seattle, particularly throughout the South Lake Union neighborhood, including properties that will be directly and indirectly impacted, and others that have been noticed for potential acquisition or lease. Moreover, we write as concerned neighbors. The long-term vitality of South Lake Union and downtown depend on the agency's ability to construct Sound Transit 3 efficiently and without undue harm. It is critical that Sound Transit carefully study and plan for the cumulative impacts of constructing multiple stations concurrently. Only with careful planning can we deliver a world-class transit system while preserving the neighborhood's vibrant mix of residents, cultural institutions, non-profits, small business, and large employers that the neighborhood enjoys today.

Despite years of engagement and process, significant questions remain about the construction plans and impacts in South Lake Union, particularly around the Denny Station. We are also concerned about the cumulative impacts of the construction of the nine Seattle stations that are part of this alignment. We expect the revised DEIS to thoroughly address the gaps and analysis that we requested in our previous comment letters, as the 2022 DEIS failed to do so.

Vulcan Real Estate looks forward to the expanded light rail network serving the region through the BLE. Since beginning operations in 2009, Link Light Rail has been a valuable asset in our region, improving access to job centers and housing that bolster our economy and support the density needed for a growing urban environment. However, the 2022 DEIS did not adequately disclose, analyze, or address the foreseeable negative impacts likely to be caused under the current construction plans for the South Lake Union and Denny Station locations. These construction impacts could cause long-term harm to the communities light rail is intended to serve. Our concerns were detailed in public comment letters submitted in 2022 in response to the original DEIS issued January 2022, and we add them here by reference.

In addition, the revised DEIS includes options that were not included in the 2022 DEIS, namely the Denny Station options “Westlake Shifted North” and “Westlake Shifted West”. Vulcan Real Estate requests that Sound Transit complete the required DEIS analysis by studying and addressing the following issues:

- **Disclosure of underground conditions and utilities** – The previous DEIS failed to accurately and adequately identify and assess underground utilities and how their location, need to be altered, accommodated or moved would impact construction timelines, logistics, and budgets. The construction timelines and budgets in the original DEIS are inaccurate, unreliable and silent on community impact. To be considered an adequate DEIS, there must be disclosure and analysis of all affected underground facilities and utilities. Specifically, describe the scope, schedule, and cost implications of temporary and permanent relocation of overhead and subterranean utilities owned by Seattle City Light, Seattle Public Utilities, King County Metro under Westlake Avenue, Denny Way, and Harrison Street. The narrative should also include all private and public utility connections adjacent to any construction activities. The analysis should address what streets these utilities will be relocated to and from, noting the timing and duration of these relocations. Additionally, the revised DEIS should provide an aggregated view of station-specific impacts as well as the regional impact of concurrent station construction occurring blocks apart.
- **Due diligence regarding construction logistics** – The 2022 DEIS alternatives have not been vetted with construction experts who can confirm the feasibility of the construction approaches and timelines. The updated analysis must disclose the full scope of construction activities, allowing assumptions to be tested and significant impacts during construction to be properly assessed.
- **Direct and indirect impacts to properties** – The revised DEIS introduces options not identified in the 2022 DEIS. To complete this analysis well, it is essential to understand the sequence of construction and comprehensively identify the resulting impacts to properties. The revised DEIS must disclose the full construction sequence and duration, including site-specific details and a comprehensive regional review relative to timeline and schedule.
- **Transportation and access, including cumulative construction impacts across South Lake Union and downtown** – A downtown-wide traffic model is essential to adequately understand the cumulative impacts of closures and detours, enabling adequate planning and mitigation. The analysis should detail specific locations, blocks and timeframes for street closures, including bike lane closures and sidewalk closures,

for stations that will be simultaneously under construction. This analysis must include forecasted trip and Level of Service metrics before and during construction, as part of an aggregate regional impact analysis.

- **Transportation detours and mitigation**– For the revised DEIS to be considered adequate, the impacts on pedestrians, bicyclists, transit users, vehicle circulation, truck and freight traffic must be fully disclosed. In particular, the Preferred Alternative eliminates the South Lake Union Streetcar for a minimum of eight years, excluding the additional time required to resume operations. Pre-pandemic the streetcar carried 2,000 riders daily, and SDOT projects that its extension on First Avenue could increase ridership to 28,000 riders daily. The DEIS must detail plans to replace this service during construction and account for bus detours around Westlake Avenue during partial and full street closures. Reduced transportation services and delays must be analyzed and mitigated.
- **Construction staging** – The revised DEIS should include detailed construction logistics plans showing how material, equipment, and labor force will be managed. This includes proposed sites for labor force parking, job and support offices, and transportation to and from parking areas to project sites.
- **Construction worker parking and site access** – Construction activities will require hundreds of workers to park and access sites daily. Without designated parking, workers may occupy valuable curbside spaces needed for businesses and residents, further straining limited parking availability. At shift changes – anticipated to be three times daily – worker traffic will exacerbate congestion. Since the streets will already be near gridlocked from street closures and regular vehicle traffic, the revised DEIS must propose proactive parking and traffic mitigation strategies to address these issues.
- **Material removal and truck traffic** – Boring the 3.3-mile tunnel will require the removal of an enormous amount of material requiring transport through the city. During tunnel boring, there will be a continuous stream of dump trucks, concrete trucks, material deliveries, equipment mobilizations and demobilizations. Trucks will use major arterials like Denny Way, Mercer, Westlake, and Dexter to access I-5. This truck volume will add incredible stress to a severely constrained grid. The DEIS must analyze these impacts and propose mitigation strategies. The revised DEIS must quantify the volume of construction truck traffic required each day to remove this material, anticipated haul routes, and the corresponding impacts to the street grid and level of service.
- **Potential loss of tenants and businesses due to closures and construction impacts** – The DEIS estimates that construction of the BLE will take about ten years to complete, with each station taking five or more years. The 2022 DEIS only considered impacts to

businesses directly losing property access, overlooking broader effects on small businesses unable to endure prolonged disruptions. The revised DEIS must analyze indirect impacts on businesses, non-profits, and other organizations and propose creative strategies to offset economic harm.

- **Long-term economic impacts** – Beyond construction impacts, the revised DEIS must analyze long-term economic effects, such as loss of transit access, increased vacancies due to business displacement, tenants relocating or moving away from construction areas, and visitors avoiding downtown. Significant adverse effects on the neighborhood will extend beyond the construction period, and the revised DEIS must address these cumulative economic impacts. The 2022 DEIS considers 10-year impacts “short-term” impacts despite the long-term nature of their effects. The revised DEIS should evaluate 10-year impacts as permanent impacts to be mitigated.
- **Developing mitigation strategies** – Sound Transit must quantify and detail foreseeable impacts, offering commensurate mitigation measure. These should include compensation, location-specific mitigation plans, and clearly defined means and methods contractors will be allowed to use. Construction mitigation methods must be finalized prior to contractor selection and incorporated into contracts. The 2022 DEIS provided insufficient detail, and we request a comprehensive analysis of mitigation measures in the revised DEIS.

We look forward to reviewing the revised DEIS and working with Sound Transit to minimize impacts while advancing this important project.

Sincerely,

A handwritten signature in black ink, appearing to read "Ada M. Healey". The signature is fluid and cursive, with a large initial 'A' and 'H'.

Ada M. Healey, Chief Real Estate Officer  
Vulcan Real Estate

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