

*12/12/24 System Expansion Committee*  
*Meeting Written Public Comment*  
*Submissions*

Submissions

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## *MaryKate Ryan on behalf of Historic South Downtown*

**The attachment referenced in this comment can be found towards the end of this document.**

Good afternoon, System Expansion Committee,  
Attached, please find Historic South Downtown's comment on the just-closed Ballard Link Extensions scoping period for the new EIS process. We wanted to share our comments directly with the Board at this time. We are re-stating our objections to any of the 5<sup>th</sup> Ave South station locations in the Chinatown International District and again asking the Board to reconfirm their March 2023 acknowledgement of the damage that this station location would do to Seattle Chinatown International District. We are also restating our request that the comment period for the forthcoming DEIS be extended to at least 90 days, with in-language materials available to community members as soon as the DEIS is released for public review.

Thanks you.

MaryKate

MaryKate W. Ryan (all pronouns)

Preservation Planner

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## *Howard Greenwich on behalf of Puget Sound Sage*

**The letter referenced in this comment can be found towards the end of this document.**

Dear ST Board staff.

Please find our comment letter for the BLE scoping period that we submitted on Monday. We would also like this to be considered as public comment for tomorrow's STE Expansion Committee meeting.

We strongly oppose a 5th Ave diagonal station alternative for the CID, and this scoping letter details the impacts and harms of constructing at the that location.

Thank you!

Howard Greenwich

Research Director

**Puget Sound Sage**

he/him/his

(206) 485 7528

## *Bill Hirt*

Attention: Sound Transit Executive Committee and System Expansion Committee Members;

I urge you consider the below post from my blog details problems with your 2025 TDP

Bill Hirt

The below post from The previous post concluded the Lynnwood Line 1 ridership should be an alarm for the 2025 Line 2 extension to Redmond. This post details concerns with the Sound Transit Transit Development Plan 2024-2029 and the following changes for 2025:

*Link Light Rail 2: Line service expands to Downtown Redmond and Lynnwood City Center Stations*

*ST Express Bus: Evaluate routing for Routes 510, 522, 542, 544, 545, 550 554, and 556, discontinue temporary Route 515*

The TDP raises all sorts of questions. Does expanding Line 2 mean extending the current Starter Line 2-car service every 10 minutes for 16 hours from Redmond to Lynnwood? The Line 1's current schedule provides trains from Lynnwood to Angle Lake every 10 minutes from 4:56 am until 9:06 pm increasing 12 and 15 minute headways until 12:01 am. Thus, routing both Line 1 and Line 2 to Lynnwood will result in trains every 5 minutes for 16 hours a day.

An earlier post detailed the extension beyond UW Stadium only attracted 16,100 riders, a fraction of the 24,400 to 35,000 from Lynnwood and 41,000 to 49,000 from Northgate. That the limited ridership and high operating cost resulted in a \$20 cost per rider. The TDP for routing Line 2, two-car trains beyond CID to Lynnwood every 10 minutes for 16 hours will add over \$200,000 in operating cost without adding significant riders.

The TDP for ST Express Bus service discontinuing 515 along I-5 means the 482 October boardings, presumably 241 riders, will no longer have access to bus routes from Lynnwood and Mountlake Terrace to multiple stops in Seattle. Service every 10 minutes from 4:30 am to 8:35 am inbound and 3:00 pm to 6:15 pm return.

The 515 schedule travel times from Lynnwood to 5th & Pine was 30 minutes for the 7:25 am, the 5:35 pm return route from 4th and Pike took 41 minutes to reach Lynnwood. Comparable Line 1 travel times from Lynnwood to Westlake

were 32 minutes at 7:26 am and 32 minutes at 5:26 pm. However, any travel time savings is at least partially offset by more convenient stops in Seattle for both inbound and outbound routes.

The TDP for ST Express Bus to “evaluate” 510 will presumably terminate the route from Everett at Lynnwood T/C rather than continue with a stop at Mountlake Terrace before the non-stop route into Seattle. Its schedule and travel times are similar to 515 with 956 boardings and 478 riders with similar access benefits in Seattle.

The TDP to use Line 1 to Lynnwood to 510 and 515 routes into Seattle will add 719 boardings to the 21,135 October boardings with the light rail extensions beyond UW Stadium. Those boardings along with the 6289 UW Stadium and 10,003 Capital Hill boardings total 37,400 along Line 1 to Westlake; well within the capacity of 4-car trains every 10 minutes. Especially since many of the UW District and Stadium boardings are presumably during afternoon return. Thus there’s no need to route Line 2 to Lynnwood and incur its additional operating cost.

The TDP’s remaining route changes are the result of a June 21, 2014 Sound Transit proposal to Mercer Island city council to use light rail to replace I-90 bus routes into Seattle. All I-90 corridor buses would terminate at Mercer Island P&R and ST550 will no longer be routed from Bellevue into Seattle.

Despite years of objections from Mercer Island city council and island residents, the council felt compelled in a July 16, 2019 meeting to agree to accept the Sound Transit “Bus Intercept” plan. Thus, both Sound Transit and King County Metro I-90 corridor buses will be terminated at the Mercer Island P&R and the October 4374 ST550 boardings (2187 riders) will lose their current access to transit. The need to transfer to and from light rail on Mercer Island, the loss of access to multiple stops in Seattle, and hassle of access for the return trip may dissuade many current transit commuters.

The bottom line is the Lynnwood extension ridership has debunked Sound Transit’s “field of dreams” assumption for extending light rail beyond the UW Stadium station. The Sound Transit TDP for 2025 for routing Line 2 to Lynnwood and “evaluate” ST Express bus routes reflects their failure to acknowledge that result.

## *Aya Chiong-Bisbee*

To the Sound Transit Board:

I am a concerned community member, worker in the Chinatown International District (CID), frequent transit rider, and my family has had a small business in the CID for almost two decades. I am writing to express my support for the North/South alternatives for the CID station.

The 5th Ave and 4th Ave alternatives are unacceptable as they would cause devastating impacts on small businesses, residents, workers, and more. There is a history of public development projects damaging and displacing this neighborhood and community. The pollution, road closures, and economic stress the 5th Ave and 4th Ave alternative would cause are unfair and damaging to our neighborhood which is at the highest risk of displacement in Seattle. Much of our community has spoken up about concerns regarding these alternatives. It is unacceptable that Sound Transit is still considering these options. While the construction duration would be temporary, their impacts on our neighborhood would be long term.

North and South locations are compelling alternatives that would benefit the CID without all of the harm. As someone who uses public transit frequently, I know that our region needs public transportation; however, it does not need to be at the expense of a low-income neighborhood of color. The North/South options should be the preferred alternatives.

Sincerely,  
Aya Chiong-Bisbee

*Jacqueline Wu*

To who it may concern,

My name is Jacqueline Wu, I'm a resident of South Seattle, work in South Lake Union, and the CID is my cultural home.

I ask that the board select the North/South Station as the preferred station for the CID neighborhood. The 5th Ave option will be adversarial to the neighborhood. Business in the neighborhood are still recouping the effects of the Street Car construction and COVID 19.

The neighborhood is not a thoroughfare, but is home to elders, families, and workers. Construction in the heart of the neighborhood will disrupt the vibrancy of the community and negatively impact the lives of many elders and children who will have to navigate construction sites.

The CID is a community that has been historically impacted by systematic racism that is still felt today: redlining forcing BIPOC communities east of Occidental St; construction of I5 tearing the neighborhood in half, and Kingdome threatening to turn the neighborhood to a parking lot and many more.

I urgently ask that the board select North/ South as their preferred station option, and for local governments to begin to undo the legacy of racism against the neighborhood. I ask Sound Transit to center their decision on the impact to the elders, families, and workers in the neighborhood.

Best regards,  
Jacqueline Wu

*Jason Greenland*

**The following comment was provided via the virtual comment submission form.**

**Topic**

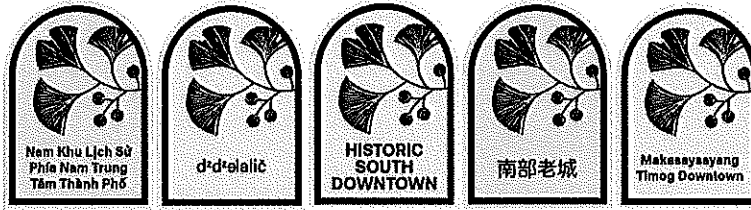
Rail system

**Comment summary**

Vision outlined in Seattle Subway ST4 i think should be done. Even if its not all done via trains/rail should be done with those double deck or accordion/like buses.

*Betty Lau*

**The entirety of this comment is included as a transcript towards the end of this document.**



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## HISTORIC SOUTH DOWNTOWN

6 December 2024

Lauren Swift  
Sound Transit  
401 S Jackson St  
Seattle WA 98104

SENT VIA ELECTRONIC MAIL

Dear Ms. Swift:

This letter is submitted on behalf of the Pioneer Square International District Community Preservation & Development Authority (dba Historic South Downtown, hereinafter HSD). HSD appreciates the opportunity to submit input on the scope of the new environmental impact study for the Ballard Link Extension, separated from the 2019-2023 West Seattle Ballard Link Extension project. HSD was created in 2007 specifically to help elevate community voices and community needs in large scale public projects like Ballard Link Extension.

We maintain that the original purpose and need, as stated in the 2022 WSBLE DEIS, is adequately articulated, and we continue to agree with and support its goals. Equitable access to transit is key to Pioneer Square and Chinatown International District, historic neighborhoods originally developed around changing transportation systems that demonstrate that “transit-oriented development” is a proven, century-old neighborhood development pattern that we should emulate, while also sustaining and preserving the existing neighborhoods.

### **Extended Comment Period**

In 2022, the comment period was extended to 90 days to recognize the complexity of this project but also the challenges of engaging some sectors of Seattle’s communities. We request at least a 90-day comment period for the forthcoming Ballard Link Extension DEIS. Additionally, we ask that translated materials be provided at the outset of this comment period, along with resources for language access throughout the process.

### **Alternatives To Be Studied**

The heart of an EIS is its comparisons of alternatives, its identification of the significant adverse impacts of various alternatives, and its identification of potential means of mitigating the adverse impacts of a proposal. This EIS is complicated by the prior scoping of 4 alternatives for the CID segment of the line, the addition of 1 alternative to the original 2022 WSBLE DEIS, the 2023 determinations by the board that 4 of those original alternatives were infeasible or undesirable, and during Further Studies, the introduction of 1 additional alternative that also affected the southernmost Downtown segment station, Midtown. This final alternative was determined by the Board to be the “preferred.” A thorough EIS is one which studies a full range of *reasonable alternatives* and identifies the trade-offs and benefits of one alternative over another, as well as the means to mitigate the adverse impacts of the alternative that is ultimately chosen.

West Seattle Link Extension: We request that the choices made for the SODO station through the West Seattle Link Extension process, and their impacts on Pioneer Square and Chinatown International District for construction traffic, property acquisitions, and potential alignments, be fully addressed when discussing alternatives and cumulative impacts in the upcoming BLE DEIS. Sound Transit's decision to separate the two light rail projects moves the WSLE project's foreseeable impacts during construction and operations into the cumulative impacts for the Ballard project.

For the alternatives identified as CID-2b and CID-1b [5<sup>th</sup> Ave Deep, 4<sup>th</sup> Ave Deep]: We ask that the new/revised/supplemental EIS address the reasons that these alternatives proposed in 2019-2022 are now considered infeasible or undesirable.

For the alternatives identified as CID-2a [5<sup>th</sup> Ave shallow and 5<sup>th</sup> Ave Shallow Diagonal]: We believe that the community clearly stated its objections, which were acknowledged by the Board, and we do not wish to re-litigate the catastrophic impacts of these alternatives. The Board acknowledged these impacts, and no information was shared on these alternatives between October 2022 and November 2024. If Sound Transit wishes to advance this alternative, our questions and concerns were identified in our 2022 DEIS comment letter, attached as appendix B.

If, as the Board indicated in February and March 2023, CID-2a is infeasible, it should not be used as a baseline for comparing costs or impacts.

For the alternative identified as CID-1a [4<sup>th</sup> Ave Shallow]: We ask that the additional studies from 2023 and 2024 be integrated into the new DEIS, with appropriate comparative assessments done between the viable alternatives. Additionally, the discrepancies within City of Seattle documentation with regards to the 4<sup>th</sup> Ave South viaduct's status need to be reviewed and clarified – if, as the 2015 Move Seattle Levy's project list indicated, the viaduct needs to be replaced, that project must be included in the known projects list when cumulative effects are assessed.

For the preferred alternative, which has been known as South of CID/Dearborn Street station, and North of CID/Midtown (2023): Because we have spent two years with Sound Transit staff presenting this station couplet as an alternative to the CID-1a 4<sup>th</sup> Ave S station option, we ask that comparisons between the preferred alternative and the 4<sup>th</sup> Ave S/Midtown (DT-1) station options be provided. Our communities have dedicated two years working with Sound Transit staff on these options. We would like to compare and clarify tradeoffs between these couplets and need continuity in the presentation of information.

We additionally request that a ridership and connectivity comparison between South CID/Dearborn + North CID/Midtown (2023) be compared with South CID/Dearborn + Midtown (DT-1) be included, focusing on connectivity with First Hill. In Seattle, First Hill hosts an important concentration of health care services and as such it is important to our community members and to transit riders within the system. With the completion this year of Rapid Ride G, which the Midtown (DT-1) station was intended to connect to, we wish to understand the tradeoffs between the two potential Midtown station location options before a final decision is made.

In keeping with the purpose and need to expand mobility for the corridor and the region's residents, which include transit-dependent people, low-income populations, and communities of color, we wish to see the impacts of different alternatives selection on ridership from



equity-seeking groups. We request transit integration modeling, ridership modeling, and an equity assessment done in the same model as the work done by Sound Transit staff for the 7/27/23 Denny Station Status Report for the Board of Directors, slides 16-25, and 38, for the CID 4<sup>th</sup>, North CID/Midtown(2023), and South CID/Dearborn stations.

For the South CID/Dearborn Street station: we ask that the DEIS address the City's need to rezone the parcels if residential TOD or eTOD is to be allowed on the site. The South CID/Dearborn station location was rezoned as part of the Maritime and Industrial Rezoning of 2022. Selecting this site for a station may be allowable under this current zoning, but Sound Transit has promised equitable TOD that would include residential units. A foreseeable impact of this potential mitigation is a need to rezone the land, so if eTOD that includes residences is proposed, the impacts of this rezoning process should be included.

Haul routes along Dearborn to I-5 will affect air quality and cause noise to sensitive populations along that route. This impact must be analyzed and appropriate mitigation measures identified, if possible.

Mitigating the impacts on the artists in the INScope Arts building, a National Register-listed historic building with significant cultural, historic, and architectural features directly adjacent to the construction zone, along with protections for the building itself, should be addressed in the DEIS.

Additionally, we suggest that Sound Transit consider the Urban Design Framework that was accomplished for the Capitol Hill Station as a model for managing community input for and mitigating the impacts of a new station and surrounding TOD. A UDF could be used to establish a process for eTOD, and to lay out current considerations for suitable uses of the site. City adoption of this UDF would help the solidify community input in the future development.

For the North CID/Midtown (2023) station: This station location will affect a vulnerable population not identified or studied in the 2022 DEIS. The station location is surrounded by social and public services, as well as transitional and supportive housing. The effects on these programs, the populations they serve, and the feasibility of finding other suitable and sustainable locations, not just the economics of relocation, must be part of the due diligence for this EIS.

The County has proposed a full relocation of their Civic Campus from the location of this station to south of the South CID/Dearborn station, to support the North CID/Midtown station option. This relocation would affect both station locations, as well as the neighborhoods adjacent to them – Downtown, Pioneer Square, Chinatown International District, and SODO. The cumulative impacts of this transportation project and an associated, adjacent County Civic Campus relocation, should be considered under the Cumulative Impacts section of the EIS.

### **South Downtown Hub**

For all options, Sound Transit has been working with the City of Seattle to study activation of the area around Union Station, extending the former "Jackson Hub" area to a larger "South Downtown Hub" that now stretches from the North CID/Midtown (new) station option at 5<sup>th</sup> and James to the South CID/Dearborn Street station option at Dearborn and 6<sup>th</sup> Ave. As the goal of some of this study was to identify ways to provide better connectivity between the existing light rail stations and proposed new ones, this is mitigation by design, and the elements of the Hub

projects that will be undertaken by Sound Transit as part of the project should be clearly identified with cost estimates and transit connectivity studied.

All transit riders are pedestrians for at least part of their commute. The current preferred alternative for the CID segment and the southernmost Downtown segment stations require transit riders to spend little more time as pedestrians, walking from station to station. As such, addressing pedestrian infrastructure for transfers and last mile connectivity will be a key part of station design and mitigation of the choices of more distant station locations. More specific infrastructure projects must be designated to make these stations work for riders. The City and Sound Transit should come to early binding agreements about shared responsibilities. Too often, CID and Pioneer Square infrastructure projects get delayed because of the complicated shared responsibilities of literally every transit option in town meeting here – *unsecured promises to work together are inadequate mitigation for this project.*

### **Overall Study Areas Identified as Inadequate in 2022 DEIS for WSBLE**

The new alternatives have changed the Area of Potential Effect and likely changed the historic and archaeological resources that must be considered under Section 106 of the NHPA. We look forward to reviewing the new APE.

Stadium and other surge events must be studied for their impacts on traffic, both during construction of BLE and during operations far into the future. While the stadiums work to be good neighbors, the City and Sound Transit must work with them to understand the impacts of large events on neighborhood traffic.

The community and economic impact studies looking at small businesses need to recognize that Pioneer Square and Chinatown International Districts are unique commercial ecosystems with place-based businesses that cannot be relocated without grave harm. Small locally-owned businesses are character-defining features of both small business districts, and they have suffered cumulative impacts from many construction projects (particularly Pioneer Square) and from pandemic-related impacts (particularly CID with racist violence).

One of the core reasons for HSD to exist is to advocate for the people and businesses that have built and continue to make Pioneer Square and Chinatown International District thriving and beloved neighborhoods in Seattle. We strongly believe that major projects like BLE must serve those who live and work in the area now, as opposed to creating opportunities for large-scale new developments or redevelopments that will displace current people and businesses, and make it harder for the low-income communities to find their place in the future.

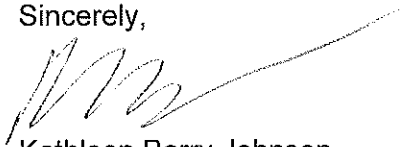
Gentrification is not a net-benefit to either district, as identified in the 2022 DEIS. Increased displacement risks for our residential and commercial tenants is a foreseeable, negative impact. Public safety both for construction and long-term operations will be impacted and should be addressed by the DEIS. Sound Transit must do better to compile a list of City-funded projects that will also impact south downtown during BLE construction or will foreseeably follow BLE construction like promised TOD construction, new roads, or major redevelopment projects that are currently under consideration on the periphery of the BLE project. Community cohesion absolutely will be affected by construction; these impacts must be analyzed and mitigation proposed, if possible. The DEIS must adequately address quality of life and health impacts during construction and operations. This is fundamental in answering the question of whether the BLE helps or hinders land use policy goals.

**Conclusion**

HSD supports the extension of light rail to Ballard, fulfilling a key part of the Sound Transit 3 program approved by voters in 2016. This project carries the potential to create a more connected, accessible regional transportation hub in South Downtown Seattle, improving access for commuters using light rail, the Sounder, Amtrak, Seattle Streetcar, King County Metro, WSDOT Ferries, as well as the larger connected region. HSD supports this vision.

We expect Sound Transit to use its resources, which are far greater than the resources our local community organizations can access, to provide meaningful and effective community engagement through an extended DEIS comment period in 2025. We look forward to helping our community participate in the next phase of this project.

Sincerely,



Kathleen Barry Johnson  
Executive Director  
Historic South Downtown

Appendix A: 2019 scoping letter

Appendix B: 2022 DEIS Comment Letter

Appendix C: Ballard Link Extension: Denny Station status report to the Sound Transit Board of Directors, 7/27/2023



**Puget Sound Sage**  
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9 December 2024

Lauren Swift - Ballard Link Extension  
Sound Transit Board Members  
Goran Sparrman, Sound Transit CEO  
401 S. Jackson St.,  
Seattle, WA 98104

RE: Scoping for Ballard Light Rail Extension DEIS and CID station location

Dear M. Swift and Sound Transit Board Members,

In 2023, community leaders and organizations from Seattle's Chinatown International District (CID) came together to oppose a Ballard Link Extension station (BLE) in the heart of their neighborhood. This included the Fifth Ave Deep, Fifth Ave Shallow, and Fifth Avenue Diagonal alternatives. As a result, the Sound Transit Board (through Motion No. M2023-18) designated a new option – two stations just north and south of the CID – as the preferred alternative. The Board also requested additional investigation of a new Fourth Ave “shallower” station in response to concerns raised by some that the North and South stations were not co-located with the existing CID transit hub.

We were subsequently very surprised to see the Fifth Avenue diagonal included in a recent report to the Sound Transit Board, as if that alternative was now being considered along with the other two. For the purpose of this letter, and the BLS DEIS scoping in general, it is unclear what alternatives are now being studied in the upcoming EIS. No outreach or advanced notice to the CID community was given. This failure on the part of Sound Transit is consistent with the inadequate community engagement in the lead up to the larger WSBLE DEIS in 2022 and 2023.

Furthermore, based on M2023-18 and the Board's discussion of alternatives at the time, Fourth Avenue shallower no longer meets their criteria for station location and should not be further considered. Sound Transit's purpose in M2023-18 was to study how the high cost and disruption to the CID community could be reduced for the Fourth Ave Shallower alternative. In *Additional Study Results: Construction Approach and Duration for CID Alternatives*, Sound Transit staff and experts determined that reduction of both cost and harm is not possible with a Fourth Avenue option and therefore would not be considered further.

For the following comments on BLE scoping, we will assume that all three alternatives (Fourth Ave Shallower, Fifth Ave diagonal, and the South station) are being seriously considered. We also expect the following from the NEPA DEIS analysis:

- The three station options mentioned in the *Additional Study Results* will be compared so the public and Sound Transit Board can clearly identify the costs and benefit tradeoffs of these station alternatives to the CID community and neighborhood.
- Additional and deeper study of the impacts for both construction and operational periods.
- Deeper analysis of environmental justice impacts to the CID neighborhood, especially cumulative impacts.

### **Concentration of Impacts in the CID**

The CID is a highly concentrated, highly integrated and dense neighborhood. For its size, the neighborhood provides more social cohesion and cultural access than any other in Seattle. Although small, the neighborhood provides larger than expected social and economic benefit to members, visitors, and the region. For this reason, impact analyses to the neighborhood must be fine-tuned and specific. As was revealed by strong community opposition to station sites in the middle of the CID, construction impacts are especially important to the community.

To that end, we believe the 2023 DEIS provided an inadequate level of detail and specifics to understand construction impacts. Given the high amount of commercial, industrial, tourist, customer, resident, and unhoused people's use of streets in a concentrated neighborhood, Sound Transit must gain a better understanding of local dynamics - a small change in one part of the neighborhood could greatly affect another. For example, a statement in the WSBLE DEIS that a six-year (or more) construction period will be merely an inconvenience misses the interdependence of both stakeholders and the CID's sub areas. For example, under a Fifth Ave Diagonal station, closure of King Street and presence of large-scale construction across the street from the CID's most important park will have major ripple effect not captured in the prior DEIS.

As another example, the WSBLE EIS stated that "Hing Hay Park would experience proximity impacts due to construction staging across the street on the west side of 6th Avenue South. Impacts would include a temporary increase in construction traffic, dust, noise, and would also be visible to park users." This is not an analysis of levels of particulate matter caused by construction nor levels of construction noise, but a vague statement that anyone could come up with – it also lacks a cumulative analysis. We expect Sound Transit to provide measurements and more detailed comparisons when it comes to historically impacted communities.

### **Transportation Impacts**

#### Current Travel Modes

The BLE EIS must study the current modes of travel for the CID's myriad users.

During the debate on a CID station location, many people outside of the neighborhood complained that a South station would make the new light rail line too inaccessible. Several residents said that they would not be able to travel to a South station from their apartment. However, no analysis was provided by Sound Transit on who uses light rail now and who will use it in the future. A Sage-conducted survey of 70 CID residents and workers – most of whom were older than 60 – showed that few people rely on

light rail to travel. By far the highest modes were walking and Metro bus. This mode split is likely a reflection of both the frequent destinations of residents as well as cultural familiarity with bus travel.

Furthermore, the high ridership figures for a future CID station, by Sound Transit's own estimates, does not reflect people coming to the CID or Pioneer Square neighborhoods, but transferring within the light rail system or to other travel modes. Sound Transit should provide clarity on whether or not the CID will benefit from the high ridership or simply be a transfer point. We need a comparison of the station options and their benefit to the community, based on a projection of actual visitors disembarking in the CID. This will illuminate the tradeoff between impacts to the CID versus benefits for the rest of the region – a tradeoff the CID and its BIPOC community have been forced to endure for decades.

#### Pedestrian Impacts

Sound Transit must provide an analysis of pedestrian activity in the CID. During construction, the 5<sup>th</sup> Ave Diagonal and the 4<sup>th</sup> Ave Shallower locations will be very disruptive to key pedestrian corridors and access to the CID. In the WSBLE DEIS, Sound Transit claims that rerouting pedestrian traffic around construction hazards will create an "inconvenience" for people using the sidewalks. The problem with this conclusion is that the CID is already hazardous for pedestrians, despite its high walkability. Streetcar rails, deteriorated sidewalks, cars short-cutting through the neighborhood, massive car influx during sports events, delivery drivers to the dozens of restaurants, and delivery trucks to the many businesses create a maze of hazards that pedestrians must navigate. We need to know which of the station locations will exacerbate this cumulative impact the most and least. Sound Transit can collect data on pedestrian traffic volume on different streets and roads (just like is done for intersections) especially for those being closed or partially closed.

On the flip side, the community needs to know how many large trucks and construction vehicles will be on the streets during the different phases. For example, the 5<sup>th</sup> Ave and South stations will require an enormous removal of soil – how many dump trucks will be driving through the neighborhood and on what streets? Again, the CID is not a typical neighborhood. We have a disproportionate number of elderly, unhoused, low-income and BIPOC residents that have different travel patterns and needs than in other Seattle neighborhoods. The community does not want to experience death or injury from the conflict between construction vehicles and local mobility.

#### Gateway to CID

The Chinatown gate monument that welcomes visitors to the neighborhood is more than symbolic – most people exiting the Union Station transit hub walk east on King Street to the center of the historic part of the CID. Closing off King Street for a Fifth Ave Diagonal station for a proposed 3 years (minimum) could be harmful to far more businesses than just the ones being displaced by building demolition. The BLE DEIS's analysis of pedestrian activity assumes walkers will just go around (although Weller may be closed as well) the block. However, fewer people may visit the CID as a result, having an indirect impact on other businesses, social service providers, and cultural attractions.

#### Cumulative Impacts

The BLE DEIS mentions the impact of multiple development projects occurring at the same time as a source of disruption and displacement. But the DEIS lacks the details needed to compare station locations.

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For example, several large buildings have recently been developed or are being developed now in the CID. Given the tight quarters and scale, project construction is slow and requires long lasting sidewalk closures. The BLE DEIS should include potential development projects through the end of construction to determine cumulative impacts.

More specifically, the Fifth Ave Diagonal and South Station locations offer significant TOD potential. Construction of new, affordable and community-oriented projects will be key to the success of the new station. However, this will add to cumulative impacts – even though construction may end after 6-7 years, how many more years of building construction also close sidewalks and create hazards? Given how long in-fill development takes, the station area could experience 10-15 years of construction.

#### Bus Cuts

After the opening of the Link Light Rail Line to SeaTac Airport, King County Metro cut several bus lines and reduced frequency of others, concluding that they are redundant with the new light rail line. However, the light rail stops every mile or so, while the cut buses (such as the 42) stop every few blocks, serving children, elderly people, and other mobility-limited users. Instead of an enhancement, the riders on these buses experienced a loss in service, either experiencing longer trips or shifting to a different mode altogether.

The DEIS needs to show whether transit dependent CID residents will lose more local service than gained from a light rail station. Will Metro cut buses from West Seattle? Or buses coming from South Seattle to circulate downtown? Community members need to understand these implications before being able to weigh in on alignment and station locations.

#### Congestion

An analysis of intersection Level of Service should be done for the South Station alternative for comparison with the other two, which were included in the WSBLE DEIS.

### **Environmental Impacts**

#### Noise and Vibration

The CID experiences a disproportionate level of noise and vibration, compared to many other residential neighborhoods in Seattle. Many residents and people on the street are already impacted by I-5, the Streetcar, heavy traffic on arterials (Jackson St, Dearborn St, and 12<sup>th</sup> Ave), as well as congested streets within the neighborhoods. Continuous building construction adds yet more noise. Moreover, a large portion of affordable housing in the neighborhood lacks air conditioning, and closing their windows in the summer is not a safe option.

The WSBLE states that “Distribution of [noise] impacts to minority and low-income populations would be similar to the distribution to the general public” (page 5-55) and that “No monitoring was done in the SODO, Chinatown-International District, or Downtown segments because the project would be in a tunnel or in areas without noise-sensitive receivers” (4.3.7-4). The DEIS further states that dBA could be as high as 89 at 50 feet for cut and cover construction, which could be painful for a large number of people around a construction site. Because of this, we believe Sound Transit has not adequately assessed the noise impacts during construction.

Sound Transit should measure current noise volumes in the areas near the proposed station location alternatives, so an adequate cumulative impact can be calculated. Sound Transit should also consider Hay Hing Park as a sensitive receiver – cultural events and outdoor concerts occur there all the time.

#### Air Quality

The CID has some of the poorest air quality in the city. Airborne particulate matter from I-5, the Port of Seattle’s maritime operations, commercial truck traffic and some fossil fuel powered buses blanket the community with pollution. The community also experiences disproportionate respiratory illness. While a new transit line will reduce pollution for the region, the question for Sound Transit is whether the construction of the new station will create a harmful cumulative impact, especially on residents and workers who live nearby the proposed station alternatives.

As with noise impacts, Sound Transit has not measured actual particulate matter levels in the neighborhood. Furthermore, the WSBLE DEIS states that “According to Code of Federal Regulations Title 40, Section 93.123(c)(5), because the duration of major construction activities for the project would not exceed 5 years in any one location, construction emissions are considered a temporary impact and a project-level conformity analysis is not required” (page 4.3.6-7). As we state above, construction involving large vehicles and equipment may last six years or more on the station alternatives, and even longer with construction of TOD near the stations. Sound Transit should provide air quality data on both diesel and dust particulates already present and projected during construction for each station area.

#### Business Displacement

Small businesses are the life blood of the CID’s local economy. Several factors allow restaurants and shops to succeed – older buildings that are more affordable, proximity to multiple high-capacity transit lines, many local and regional visitors of Asian heritage to specialty shops, proximity to sports facilities, and cultural assets that attract tourists and visitors. But small businesses in the CID are also fragile, consisting of many small mom-and-pop that operate at thin margins and are very sensitive to changes in the above factors. Sound Transit further states, “These displacements include businesses that are important to the community because of the history, strong cohesion, and long-standing community connections in the neighborhood.”

While the WSBLE DEIS identifies exactly which buildings will be torn down and the number of businesses displaced for station location alternatives, it fails to consider the broader impact of station construction on the rest of the CID. For example, closure of King Street and Weller Street could create enough diversion away from the area around Hing Hay park that other businesses east of 6<sup>th</sup> Ave will suffer as well. The potentially displaced businesses on 5<sup>th</sup> and King Street, under the 5<sup>th</sup> Ave Diagonal option, may not be able to succeed in any other location, relying heavily on being across the street from Union station.

Sound Transit should study the number of commercial spaces available for small businesses, the importance of proximity to foot traffic, and whether or not displaced businesses could successfully relocate. In addition, subsequent construction of mixed-use buildings should not be considered replacement space, as rents for new construction are far higher than in older buildings. As the CID could suffer a permanent loss of key affordable business space with the demolition considered for 5<sup>th</sup> Ave Diagonal, Sound Transit should also compare the locations to determine the least harm.



### Historic Preservation

The WSBLE DEIS states that no station options in the CID can avoid demolition of a potentially historic building. However, the CID South station was not considered. Because the Federal Transit Administration requires a determination of least harm, and the South station does not result in demolition of a historic building, the new DEIS must compare all three alternatives.

### Transit Oriented Development

We believe that equitable TOD that creates affordable housing, affordable commercial space, cultural spaces, new recreation space, and cultural preservation is the most important, long-lasting benefit of a new station. It will be an opportunity to grow the neighborhood in ways that include, not displace, existing community members.

To that end, Sound Transit should study the actual TOD potential in detail, not in the vague way described in the WSBLE DEIS. To compare station location alternatives, we should know:

- Total area of land available for TOD after station construction.
- Total number of affordable units that could be built, with a baseline of Sound Transit's TOD policy, but also beyond.
- Specific opportunities for joint development with CID-based developers.
- Potential for a new park or recreational open space, which the neighborhood currently lacks.

### **Closing Notes**

The CID has always been a welcoming space for strangers and working-class people, as well as a hub of commercial activity for Seattle. Public transit has been key to the longevity of the community and is today used widely by the CID's BIPOC residents and workers. Despite perennial construction in and around the CID, public transit is one of the clear benefits to the community, in contrast with I-5. However, the proposed WSBLE system may only marginally improve transit access to CID stakeholders. We don't want to see, once again, an infrastructure that is a benefit to the region (and State) but causes disproportional harm to the CID – with little upside. We believe that if Sound Transit can study and answer the questions we pose in this letter, everyone will be better informed about these tradeoffs, and which station location ensures maximum benefit to our special community. Please reach out to us with any questions you have about our comment letter at [howard@pugetsoundsage](mailto:howard@pugetsoundsage) or [jm@pugetsoundsage](mailto:jm@pugetsoundsage). Thank you for your time and attention.

Sincerely,

**JM Wong**, Organizing Director  
**Howard Greenwich**, Research Director

**Public Comment by Betty Lau at System Expansion Committee Meeting, Thursday, Dec. 12, 2024, 1:30 p.m., Union Station**

**I'm Betty Lau, from the Chong Wa Benevolent Association and co-founder of Transit Equity for All.**

As a writing teacher of over 40 years, I know how reports can be written to reflect biases and opinions under the guise of factual presentations.

The independent consultant report on 4<sup>th</sup> Avenue further studies is extraordinarily one-sided and opinionated:

1. No comparable soil studies for other alternatives.
2. No comparable risk assessment for other alternatives.
3. No solutions offered other than don't even try.
4. No community collaboration on social and economic implications.
5. No long-term cost benefit analysis to compare with future benefits to see if they outweigh the risks or not

I also want to point out the 4<sup>th</sup> Avenue viaduct sits on the same soils as what the independent consultant shows on his map. It is rated fair by the city. If it is as dangerous as the independent consultant says it is, then it should be shut down.

We know that won't happen until it fails, like the West Seattle Bridge--also rated fair, when it failed.

Therefore, the independent consultant's report should be set aside until comparable independent studies on soils and risks are done for all the alternatives.

And please, Stay Off 5<sup>th</sup>! Don't kill off Chinatown!

Thank you.

