

December 9, 2024

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

Sent via email to 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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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; 4th 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.