

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 [5th Ave Deep, 4th 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 [5th Ave shallow and 5th 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 [4th 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 4th 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 4th Ave S station option, we ask that comparisons between the preferred alternative and the 4th 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 4th, 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 5th and James to the South CID/Dearborn Street station option at Dearborn and 6th 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.

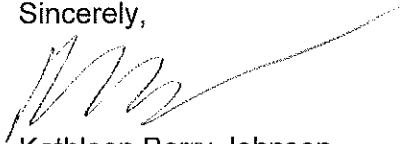
Gentrification is not a net-benefit to either district, as identified in the 2022 DEIS. Increased displacement risks for our residential and commercial tenants is a foreseeable, negative impact. Public safety both for construction and long-term operations will be impacted and should be addressed by the 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



Kathleen Barry Johnson,
Executive Director

BOARD OF DIRECTORS

Wren Wheeler
President

Heidi Hall
Vice President

Jamie Lee
Treasurer

Azar Koulibaly
Secretary

Maria Batayola
Julie Fonseca de Borges

Heidi Park

Dana Phelan

Stephanie Pure

Tom Sang-gu Im

Carl Seip

Karen True

March 27, 2019

Submitted via email to: WSBscopingcomments@soundtransit.org

West Seattle and Ballard Link Extensions, c/o Lauren Swift

Sound Transit

401 S. Jackson St.

Seattle, WA 98104

Re: Scope of the EIS for West Seattle and Ballard Link Extensions Project

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 environmental impact study for the West Seattle and Ballard Link Extensions (West Seattle/Ballard Link) project.

ABOUT HISTORIC SOUTH DOWNTOWN AND OUR STAKEHOLDERS

HSD was created by the Washington State Legislature in 2007 in response to unprecedented impacts of ongoing construction of major public facilities, public works, and capital projects in and around the Pioneer Square and Chinatown-International Historic Districts. It was created to preserve, restore, and promote the health, safety, and cultural identity of Seattle's Pioneer Square and Chinatown-International District neighborhoods. It is governed by a board of directors elected to represent local government and business, residents, arts organizations, non-profits, and historic and cultural organizations from both neighborhoods.

Because of our focus on the vitality of the south downtown neighborhoods, Historic South Downtown and our stakeholder partners are keenly aware of the importance of the long-term nature of the work at hand. We view every decision to be made regarding the West Seattle/Ballard link as a 100-year impact decision. The result of this project must be viewed, in part, with how useful it will be to community members and commuters in 2135, as well as 2035.

The West Seattle/Ballard Link scoping period comes at a time when our communities have limited capacity to engage in the public process. Construction of SR99 Deep Bore Tunnel, Seawall, the Seattle Waterfront, and the Streetcar, as well as demolition of the Alaskan Way Viaduct has and will continue to cause disruption to the Pioneer Square neighborhood. The Chinatown-International District is still recovering from construction of the First Hill Streetcar and more than a dozen private construction projects in various stages of development. Both

neighborhoods face ongoing public construction impacts from sewer, water, and lighting system upgrades meant to benefit all of Seattle. Community members feel the burden of a hot economy and real estate market on rents and cost of living. On top of this, our neighborhoods—like urban neighborhoods across the U.S.—are grappling with the effects of rising homelessness and violent crime. All of this is taxing our resources and challenging our resilience.

It is essential that the EIS adequately recognize the nature of the affected environment. The purpose of this discussion is to ensure you fully appreciate the important characteristics of Pioneer Square and Chinatown-International District that may be affected by the West Seattle/Ballard Link project.

According to the U.S. Census, over three-quarters of the population of the Chinatown-International District and over 40 percent of the Pioneer Square identifies as minority (2012-2016 American Community Survey). Nearly 30 percent of the population in both neighborhoods have incomes below the federal poverty level (2012-2016 American Community Survey). The highest concentration of homeless people in King County is in Pioneer Square, with over 44 percent of the population homeless (2010 U.S. Census). In the three Census block groups that comprise the Chinatown-International District, 12 to 30 percent are seniors and 25 to 40 percent of households are linguistically isolated (2012-2016 American Community Survey).¹

Data from the Chinatown-International District 2020 Healthy Community Action Plan (<https://living-future.org/wp-content/uploads/2017/08/2020-CID-Healthy-Community-Action-Plan.pdf>) shows that, when compared with other neighborhoods in Seattle and King County, the Chinatown-International District shows the highest rates of mental distress, diabetes, preventable hospitalizations, and poor housing conditions. According to the authors of the Chinatown-International District 2020 Healthy Community Action Plan, these complex health and social issues result from years of historic disinvestment and institutional racism.

Despite the challenges Pioneer Square and Chinatown-International District residents face, our neighborhoods have community cohesion, or linkages that neighbors feel to one another and community services, and resources to support them. For example, there are many health and human services providers throughout Pioneer Square and the Chinatown-International District, including: International Community Health Services (ICHS), Chief Seattle Club, Seattle's Union Gospel Mission Men's Shelter, Chinese Information and Service Center, Downtown Emergency Services Center, Compass Housing Alliance, Interim Community Development Authority, and Seattle Chinatown-International District Public Development Authority (SCIDpda). There are community gathering places where neighbors come together, including: Occidental Park, Hing Hay Park, the public plazas at Union and King Street stations, Donnie Chin International Children's Park, and the Danny Woo Community Garden.

¹According to the U.S. Census Bureau, a linguistically isolated household is defined as a household in which no person age 14 and over speaks only English and no person age 14 and over who speaks a language other than English speaks English "very well".

In addition to being home to vulnerable people, Pioneer Square and Chinatown-International District are the site of some of the most precious historic resources in Seattle. The Pioneer Square Historic District was one of the first districts to be listed on the National Register of Historic Places as a district, as well as containing many buildings that are individually listed on the National Register. Pioneer Square is “Seattle’s First Neighborhood,” home of its first major business district and the location of many of the significant events during its early history. Pioneer Square also housed the city’s original Chinatown. The center blocks of Seattle’s current Chinatown-International District were added to the National Register in 1986; the neighborhood also contains many individual buildings that are both city landmarks and listed on the National Register. Chinatown-International District as a whole has played a central role in the development of Seattle and the region, as it has been home to waves of immigrants from China, Japan, and other parts of Asia who have passed under the China Gate and claimed their version of the American Dream. It is essential that any significant public investment, such as West Seattle/Ballard Link, be designed and constructed to preserve, and not impair, the historic resources of these two historic neighborhoods.

Finally, the hard work of leaders within both communities has established a culture where a lively street-level environment with enticing shops and restaurants has encouraged business investment, attracted homeowners to live and work in the neighborhood, and generally maintained a “virtuous circle” in which the quality of one aspect of the neighborhood attracts the elements required to enhance other aspects of the neighborhood. But that virtuous cycle is both difficult to create, and fragile.

The EIS must fully analyze the impact of the design and construction of the West Seattle/Ballard Link on the larger qualities of Pioneer Square and Chinatown-International Districts, to ensure that in the name of providing mass transit, the Project does not damage the quality of two very important Seattle neighborhoods.

ALTERNATIVES TO STUDY IN THE EIS

We recognize the pressure Sound Transit is under to deliver on ST3 quickly. Promises made to voters obligate the agency to deliver faster than past light rail projects. This pressure appears to be driving a desire to narrow the alternatives to study in the EIS.

However, we believe that unduly narrowing the alternatives to be studied risks having the opposite of the desired effect; it would create a legally inadequate EIS, and risk causing several years of delay if the EIS were ultimately challenged and had to be redone. The heart of an EIS is its comparison 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. When an EIS fails to examine potential alternatives, the primary purpose of the EIS is defeated. Sound Transit will get the West Seattle/Ballard Link finished and in service fastest if it prepares a thorough EIS now. 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.

The region has recent experience with transportation planners insisting on unduly restricting the alternatives they considered in environmental documents. For years we were told that there were only two alternatives for replacement of the aging Alaskan Way Viaduct: a cut and cover tunnel or rebuilding the viaduct as a larger, more obtrusive version of itself. The first would have destroyed the historic piers along Seattle's Central Waterfront; the second would have perpetuated an historic land use tragedy for decades. Only after citizens insisted that neither of these alternatives were acceptable, eventually leading to a formal "no-no" vote, did planners seriously consider other alternatives. This led to a recognition that a third alternative—the deep bore tunnel now open to traffic—was the preferred alternative. The years of transportation planners insisting that there were only two alternatives and not looking further delayed the completion of the viaduct replacement for years, and resulted in tens or hundreds of millions of dollars of wasted design work. With that recent history, transportation planners are simply not credible if they declare that there is only one alternative that is viable and can be considered.

Under the best of circumstances, the West Seattle/Ballard Link project will be a massive project with massive impacts on the communities it affects.² HSD is concerned about the effects of any alternative—both during construction and in the long-term—on the many minority, linguistically-isolated, low-income, homeless, and elderly community members in Pioneer Square and the Chinatown-International District. Because the West Seattle/Ballard Link project will have substantial and lasting impacts on Pioneer Square and the Chinatown-International District and there is not yet enough information to understand and compare the potential impacts of different construction methods and alignments, we believe it is premature to study only one preferred alternative in the EIS. Doing so would make the EIS inadequate from its inception.

We also need to emphasize—we are a community organization of primarily volunteers, whereas Sound Transit is a multi-million-dollar organization staffed with engineers and planners. We expect Sound Transit to use its far greater resources to actively engage the affected communities as it identifies alternatives, the adverse impacts of each alternative, and potential mitigation for those impacts. We will be happy to work with Sound Transit to the extent we can in providing information about our communities and feedback on its work. But we cannot do the work for Sound Transit.

Based on information available to date, we believe the following options must be studied in the EIS, in addition to alternatives that Sound Transit might initially prefer:

² *Quite apart from the disruption from the current major public and private projects that are affecting Pioneer Square and Chinatown-International District, the long-term effects of which cannot yet be predicted, Seattle has experience with the impacts of the construction of the Third Avenue Bus Tunnel in the 1980s. That construction contributed to, if not caused, the demise of one of Seattle's three department stores that anchored Seattle's retail core, Frederick & Nelson, as well as numerous smaller retailers, and created a dead zone along Third Avenue for more than a decade, eliminating the small retailers that had created street life and public safety, and replacing that formerly healthy urban ecosystem with some of the highest crime areas of downtown Seattle. The potential adverse impacts of construction of the West Seattle/Ballard Link must be analyzed based on Seattle's actual experience with similar projects.*

- Sound Transit must study a Fourth Avenue alignment in the EIS. Sounder, Amtrak, Streetcar, and existing light rail service converge at Fourth Avenue and S. Jackson Street. Because of this, HSD believes the Fourth Avenue alignment appears to be better positioned to meet our objectives of improving connectivity between the Pioneer Square and Chinatown-International District neighborhoods, and better connecting both to the region as a whole, by leveraging the opportunities that come with serving as a regional transportation hub.³
- As there is not yet enough detail to compare the impacts of construction methods, Sound Transit must study the following options for the West Seattle/Ballard Link alignment through the Pioneer Square and Chinatown-International Districts:
 - Cut-and-cover tunnel versus bored tunnel (tunnel construction)
 - Cut-and-cover station versus mined station (Chinatown-International District/Pioneer Square station)
- We also ask Sound Transit to evaluate multiple construction delivery methods—including new integrated delivery approaches—in the interest of expediting project delivery and minimizing impacts to the Pioneer Square and Chinatown-International District.
- Considering the best information currently available, HSD and the stakeholder signatories below are not able to support a Fifth Avenue alignment as the preferred alternative. Based on the information provided to date, we have serious concerns about the potential construction impacts of the Fifth Avenue alignment. As with each alternative, we have questions about the number of businesses and residents who would be displaced during construction and the potential impacts of construction on community members' access to health and human services, community resources, and small and minority-owned businesses. We also have questions about whether there is any mitigation that would be effective in meaningfully addressing these impacts. Until those questions are addressed, and the impacts of the alternatives are compared, it is premature to identify the Fifth Avenue alignment as being “preferred.”
- Finally, there is a question of whether the “ST3 Representative Alignment” is a reasonable alternative that must be studied in the EIS. According to Sound Transit’s Level 3 Alternative screening process, the ST Representative Alignment does not perform well against the level 3 screening criteria. While we have not encountered much public support for this alternative, we encourage Sound Transit to study all reasonable alternatives for this project. If Sound Transit chooses not to study the ST3 Representative Alignment in the EIS, it may be better to study another reasonable alternative yet to be determined.

SCOPE OF THE EIS

HSD requests the EIS include the following analyses:

Acquisitions, Displacements, and Relocations

According to the 2035 Seattle Growth and Equity report, the Chinatown-International District is at high risk for displacement of low-income, minority and vulnerable populations

³ *The Jackson Hub Project Concept Report, currently in draft form but due to be finalized in early spring 2019, articulates these objectives. Attachment A includes a link to this and other land use studies and plans.*

(<https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/SeattlesComprehensivePlan/FinalGrowthandEquityAnalysis.pdf>). The West Seattle/Ballard Link project could accelerate the rate of displacement during and after construction of the project. The EIS must analyze the impact of the Project on the displacement of low-income, minority and vulnerable populations during construction and in once the project is in operation, and identify mitigation for that impact. If in 2052—a decade after the design date of 2042—West Seattle and Ballard residents are enjoying routine and efficient light rail service to downtown but low-income, immigrant residents of Chinatown-International District cannot afford to shop or find access to needed services in their neighborhood and small, family-owned businesses have been forced out of a gentrifying community, the Project cannot be labeled a success.

Construction Impacts

Some public construction projects are simply one of the hassles of living in a progressive community that must be endured. But projects such as the West Seattle/Ballard Link are so fundamentally different in scale as to be different in kind. Significant impacts on Pioneer Square and the Chinatown-International District from the West Seattle/Ballard Link project are likely to arise from the construction process, and those impacts and potential mitigation require in-depth study. The impacts from construction on transportation, parking, noise, vibration, access to public and health services, and public safety can literally be matters of life and death for residents and businesses during construction. Adequate mitigation of construction impacts is also essential, and to be adequate, the EIS must identify the specifics of mitigation to be provided and the systems that will be put in place to monitor the effectiveness of the mitigation as construction proceeds. Sound Transit will need to provide adjustments if monitoring shows particular mitigation to be inadequate or ineffective. There are several neighborhoods in Seattle (The Historic Waterfront, Pioneer Square, and Pike Place Market, to name a few) who have recent experience with the highly disruptive Alaskan Way Viaduct and Elliott Bay Seawall Replacement Projects, the First Hill Streetcar construction, and the replacement of the First Avenue water main, where it was demonstrated that with adequate mitigation, construction impacts may not be fatal to the vibrant street experience that is the foundation for our neighborhoods' success. One specific example was the funding of parking assistance, including reduced-cost short term parking in area garages and programs to inform visitors where parking is available, commitments (which must be kept) to cease construction during critical visitor periods, and funding of community information personnel, so that there is a direct line of communication between the project and the community and so that businesses and residents get as much warning of disruption as possible and know how to communicate back to the project management. If at the completion of the West Seattle/Ballard Link, residents of West Seattle and Ballard have effective public transit to downtown but Seattle's Historic South Downtown is marked by "Space Available" signs in most windows, vacant housing units, and its most vulnerable populations have been forced out, the Project cannot be labeled a success.

It is also critical that the EIS consider the cumulative construction impacts of other public projects that take place before, during, or after the West Seattle/Ballard Link. These include:

- The 4th Avenue Viaduct replacement, which SDOT has indicated will need to be replaced in the foreseeable future
- Alaskan Way viaduct replacement
- Elliott Bay seawall replacement
- Waterfront Seattle program
- Washington State Ferry Terminal expansion
- Seattle Streetcar construction
- Convention Center expansion
- Rebuilding of I-5 (which divides Chinatown and Japantown from Little Saigon)
- Nearly any upgrade to the City's water, sewer and electric infrastructure (Chinatown-International District and Pioneer Square are situated along Seattle's urban "waistline"—where the land narrows between Lake Washington and Elliot Bay – so the infrastructure runs through our area)
- Development of a new Cruise Ship terminal by the Port of Seattle

Piling one disruptive mega project onto another project magnifies the impact of all of them. Cumulative impacts in south downtown bear serious consequences that must be thoroughly evaluated. The EIS must identify such cumulative projects and identify mitigation that is equal to the cumulative impact.

Land Use

Pioneer Square and Chinatown-International District seek to advance two potentially competing objectives: promote and enhance transit-oriented development and minimize displacement of the kinds of small businesses affordable housing that exist in the neighborhoods today. As a potential major disruptive force in our community, the EIS should discuss how the Project's construction and operational impacts will affect each of these objectives and should identify mitigation of any adverse impacts.

Pioneer Square and the Chinatown-International District have undertaken a number of land use studies and planning exercises to clarify our priorities and guide future community development. Attachment A includes links to all of these studies and plans. Key land use policies that the West Seattle/Ballard Link project will most likely impact, and which need to be addressed in the EIS are:

- The Chinatown-International District has the highest public transit ridership of any Seattle neighborhood. Creating and enhancing a vibrant pedestrian environment, public gathering spaces, and transportation connectivity between Union Station and King Street Station are stated priorities for our communities (see the draft Jackson Hub Concept Design Report, <http://allianceforpioneersquare.org/what-we-do/public-realm/parksgatewaysproject/>). Any option for the West Seattle/Ballard Link alignment through the

Chinatown-International District must address this priority, incorporate elements of successful transit hub models, and avoid the mistakes of unsuccessful or struggling transit hubs. The EIS should specifically discuss mistakes that have been made with respect to the street environment associated with the Third Avenue bus tunnel and explain how such mistakes will be avoided here.

- Transit-oriented development that provides affordable small-business spaces, affordable housing, and sustains businesses that meet the needs of a lower-income, immigrant community—including opportunities in and around Union Station—are another stated priority for our communities (see draft Jackson Hub plan, *supra*). At recent public workshops held on July 31, 2018 and March 13, 2019, neighborhood residents and representatives specifically expressed a desire to study options that would revitalize Union Station as a transit station. As such, any option for the West Seattle/Ballard Link alignment should enhance, rather than preclude opportunities for transit-oriented development in Pioneer Square and the Chinatown-International District.

In addition, the land use plans and policies support the following goals and objectives, which the EIS must disclose any positive or negative impact on:

- Support the emergence of a significant residential community in Pioneer Square and Chinatown-International District, particularly for market-rate and affordable workforce housing. (South Downtown Executive Recommendations)
- Encourage employment density near the South Downtown transit hub, where King Street Station and Union Station are located. (South Downtown Executive Recommendations, Jackson Hub Project Concept Report)
- Maximize the benefit of activities related to the presence of the Office of Arts and Culture and the Office of Economic Development on the plaza level of the future King Street Station. (South Jackson Street Connections Final Report)
- Enhance public safety and opportunities for social connections, accessibility, and physical activity with environmental design improvements, including street and sidewalk improvements that are healthful, biophilic, and regenerative. (Seattle Chinatown-International District 2020 Healthy Community Action Plan)
- Pioneer Square and the Chinatown-International District are historic and iconic neighborhoods worthy of preservation. West Seattle/Ballard Link design elements should comply with existing neighborhood plans, policies, and guidelines developed to protect the history and culture of these neighborhoods.
- The Chinatown-International District is home to the largest population of elderly and non-English speaking residents in Seattle. The West Seattle/Ballard Link project should include context-sensitive design elements that address neighborhood demographic characteristics.

The Seattle 2035 Comprehensive Plan establishes the following “quality of life” objectives of particular importance to Pioneer Square and Chinatown-International District, which the EIS should recognize and for which it should identify any adverse impacts and potential mitigation:

- Preserve and enhance important public views within the Chinatown-International District and Pioneer Square neighborhoods.
- Establish more high-quality pedestrian-oriented street environments in the project area.
- Reinforce the vitality and special character of the Pioneer Square and Chinatown-International District's many parts.
- Preserve important historic buildings to provide a tangible link to the past.
- Ensure and enhance light and air at street-level and in public parks.
- Enhance the relationship of Downtown to its spectacular setting of water, hills, and mountains.
- Create new parks and open spaces at strategic locations.
- Adequately mitigate impacts of potential redevelopment on the quality of the physical environment.

The project purpose and need statement includes the following purpose: "Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development and multimodal integration in a manner that is consistent with local land use plans and policies..." We request that Sound Transit work collaboratively with City of Seattle to ensure that the design of station elements and the surrounding public realm will support current and future land use plans and policies that promote neighborhood preservation and development. We also request that Sound Transit include members of the public in those conversations, to ensure that community interests are represented in the agency conversations to shape the look and feel and future use in our neighborhoods.

Social and Environmental Justice

The nature of the vulnerable populations within Pioneer Square and Chinatown-International District are an essential part of the nature of the affected environment. The EIS should provide the analysis of social and environmental justice impact necessary for federal funding review.

The EIS will need to evaluate the impacts of construction and operation of all project alternatives on social resources in Pioneer Square and the Chinatown-International District. These social resources include: community cohesion, access to community services and resources, and access to community gathering places. The EIS will need to evaluate the impacts of project alternatives on special populations in our neighborhoods, including linguistically-isolated households and seniors. The EIS will also need to evaluate the impacts of project alternatives on environmental justice populations, including resources and institutions of particular importance to our neighborhoods' minority, low-income, and homeless community members. Finally, the EIS will need to make a determination of whether project alternatives have a disproportionately high and adverse impact on environmental justice populations.

In light of the existing health-related challenges our community members face, and recognizing that the substantial scope and scale of this project and related construction impacts, HSD requests that Sound Transit conduct a Health Impact Assessment to determine the potential effects of project alternatives on the health of populations

in Pioneer Square and the Chinatown-International District, especially vulnerable populations (low-income, homeless, senior, and minority community members). HSD and our partners encourage Sound Transit to use a broad definition of health to include pollution (air, water, vibration, and noise), physical activity, accidents and collisions, social resources, and economics, and identify opportunities to enhance health benefits while minimizing negative health outcomes.

Finally, the West Seattle/Ballard Link project will affect the economic environment in the Chinatown-International District and Pioneer Square neighborhoods. (Note that we disagree with Sound Transit and the City of Seattle's decision not to include Pioneer Square in its Race and Equity Toolkit evaluation of Level 1 and Level 2 alternatives, given the neighborhood's substantial homeless population.) We urge Sound Transit to apply a racial equity lens to the analysis of the project's likely economic impacts for both neighborhoods. We ask Sound Transit to place particular emphasis on evaluating and mitigating for the potential adverse effects of construction and operation on existing and future small and minority-owned businesses, many of which have provided a way for immigrant families to establish their economic sustainability.

Public Services and Utilities

Access to public services and first responders such as police, fire, medical emergency care, transit, schools, and human services is essential, especially given the number of homeless and elderly people living in these neighborhoods. These include human services located in Pioneer Square and the Chinatown-International District—including (but not limited to) International Community Health Services (ICHS), the Chief Seattle Club, Seattle's Union Gospel Mission Men's Shelter, Downtown Emergency Services Center, Compass Housing Alliance, Chinese Information and Service Center—and those located outside of these neighborhoods that serve residents of these communities, including (but not limited to) Lowell and Bailey Gatzert Elementary Schools, Meany Middle School, and Garfield High School.

Disruption to utility services such as water, sewer, and electricity adversely impacts all residents, but especially low-income and vulnerable populations who many not have alternative places to stay during service disruptions.

The EIS will need to evaluate the impacts of construction and operation of all project alternatives on access to public services and local utilities, identify potential disruptions, and mitigate for these disruptions.

Public Safety and Security

Public safety is a serious concern for our community members. According to a 2017 survey of residents and businesses in the Chinatown-International District, nearly 40 percent of respondents reported feeling the Chinatown-International District is not a safe place to live and/or work. (Seattle Chinatown International District Preservation and Development Authority and Interim Community Development Association, <http://idea-space.info/wp-content/uploads/2016/05/CID-Survey-Report-061117-002.pdf>).

There has been an enduring commitment by community organizations, business owners, and residents in both neighborhoods to improve public safety. For example, in 2015-16, a Task Force of twenty individuals representing Chinatown-International District resident advocates, businesses, property owners, and community development, service, and cultural organizations plus representatives from the Mayor's Office and Seattle Police Department developed recommendations to help the City of Seattle address public safety and other "entrenched issues that have plagued the neighborhood for several decades." Subsequently, the Task Force reconvened as a Public Safety Council to hold the City and community accountable for implementing recommendations emerging from the Task Force.

Unfortunately, despite our hard work and steadfastness, criminal activity persists in our communities. According to data provided by the Seattle Police Department and the Washington Office of Financial Management, the Chinatown-International District ranks third and Pioneer Square ranks fourth out of 57 neighborhoods in Seattle for highest crime rates. (Seattle Police Department and Washington Office of Financial Management, <https://www.seattletimes.com/seattle-news/data/crime-rates-down-in-most-seattle-neighborhoods-but-theres-a-big-divide-between-north-and-south/>).

The EIS needs to evaluate how construction and operation of each alternative would impact public safety and security in Pioneer Square and the Chinatown-International District. Substantial disruption from construction associated with the West Seattle/Ballard project could threaten our hard work to improve public safety. Considerations such as lighting and visibility, access for first responders, and minimizing unsecured construction areas are essential to ensuring the Project does not exacerbate our communities existing challenges with public safety and security.

Noise and Vibration

The Chinatown-International District and Pioneer Square neighborhoods include important cultural resources vulnerable to increases in noise and vibration. The Wing Luke Museum, for example, has art, artifacts, and installations that are sensitive to vibrations, and whose building has suffered from structural and other deterioration from transportation and utility projects like the streetcar.

In addition, there are nearly 170 unreinforced masonry buildings in Pioneer Square and the Chinatown-International District, according to the most recent documentation by the Seattle Department of Construction and Inspections (<http://www.seattle.gov/Documents/Departments/SDCI/Codes/ChangesToCodes/UnreinforcedMasonry/ConfirmdURMList.pdf>). Unreinforced masonry buildings are more vulnerable to damage from construction-related vibration than other buildings.

We request that Sound Transit explicitly include what we have learned about vibration effects during other area projects to date, and study the effects of construction and operational noise and vibration to these resources and other project area buildings.

Geology and Soils

As we have learned with other area projects (downtown bus tunnel, new SR 99 tunnel, ongoing and burdensome utility work throughout the neighborhoods), the West Seattle/Ballard Link project tunnel and station alternatives in the Chinatown-International District and Pioneer Square neighborhoods would have substantial effects on geology and soils resources within the neighborhoods. Tunnel boring options could have significant effects on soil stability in the project area, and could result in damage to historic resources as well as new investments in and around the project area. We request a thorough investigation of impacts on geology and soils resources to better assess the hazards and effects on neighborhood landscape, buildings, and potential future impacts to seismic stability in and around the project area.

Historic and Archeological Resources (related to Section 106)

As described in the Jackson Hub Project Concept report, Seattle's iconic transportation landmarks Union Station (1910) and King Street Station (1906) define a still active transportation hub at the south end of downtown. These stations fall within the Pioneer Square Historic District and Chinatown-International Historic District and will be directly affected by the West Seattle/Ballard project. Construction of the Project may also affect numerous other landmark buildings within the two historic districts, as well as affecting the human scale and economic viability of the districts, which is essential to maintaining their historic character. The EIS must provide a full accounting of the historic and archeologic resources in both historic districts, study the effects of the project on each of these resources and districts, and make a determination about adverse effects to the resources. For adverse effects identified, the EIS must disclose potential mitigation opportunities to offset those effects.

It is a clear goal of both neighborhoods to maintain vibrant, living communities within each district. Given the fragile nature of the cultural threads that serve as the underpinning to the historic resources in the Chinatown-International District, the EIS should seek to disclose mitigation for impacts that do not render preservation efforts that result in a "museum of what was" in the neighborhood. Historic markers are not sufficient mitigation. Mitigation identified for the West Seattle/Ballard Link project should reinforce and provide investments toward the cultural elements within the neighborhood that support the overall historic character and integrity.

The West Seattle/Ballard Link Extension project will require compliance with Section 106 of the National Historic Preservation Act. We request that Historic South Downtown be a consulting party to the Section 106 process.

Parks and Recreational Resources

Community gathering spaces are an important part of the Chinatown-International District and Pioneer Square community fabric. Hing Hay Park is located one block east of the Fifth Avenue alternative alignment, and would be subject to serious disruption during construction of the project. The Donnie Chin International Children's Park is two blocks farther away. The EIS must do a thorough review of the parks, recreational resources, and other public spaces in the Chinatown-International District and Pioneer Square neighborhoods, and study the construction and

operational impacts to these resources. Where impacts are unavoidable, the EIS should disclose possible mitigation opportunities that seek to enhance existing and create new public gathering spaces directly in the neighborhood, and potentially within the project footprint.

Transportation

Transportation and parking impacts are one of the most obvious significant adverse impact of the construction process and must be fully analyzed in the EIS. But the EIS should also address the transportation impacts of the completed design. Will it be harder or easier for people coming from Ballard or West Seattle to get to Pioneer Square or Chinatown-International District if the new tunnel has only a station on Madison Street? How will people with mobility impairments be affected? What will the impact be on bus traffic, transit routes, and stops through the neighborhoods? What will the impact on scarce parking be, and how will those impacts affect local small businesses and their access to customers and deliveries?

We have heard throughout the screening process that any alternative will displace buses from the E3 busway through SODO. We request a thorough analysis of where those buses would be routed during construction and once the project is complete. Pioneer Square is currently experiencing the effects of increased bus traffic through the neighborhood along First Avenue due to Viaduct demolition, and through Waterfront construction, and is experiencing the dramatic effects that bus volumes have on the integrity of the public realm (eroded pedestrian environment), as well as wear and tear and direct damage to underground resources such as areaways. The EIS must analyze the effects of bus diversion through the neighborhoods during construction and operation of the project. It should also disclose the cumulative effects of those diversions before and during the project.

The volume of people moving to and through the neighborhoods will have an indelible effect on the fabric of the communities, offering both a threat and opportunity. The EIS must include a thorough analysis of the expected ridership of the West Seattle/Ballard Link project and the total ridership expected to travel to and through the Historic South Downtown station, including the number of people traveling from the new West Seattle/Ballard link to other modes of transit in the neighborhoods: bus, existing light rail, Sounder, Amtrak, Streetcar, ferries. The EIS should provide models of anticipated transit rider movements through the neighborhoods and be explicit about the assumptions used to build those models. HSD requests that Sound Transit engage the community about the assumptions they will use to build their transportation models and provide opportunity for the public to inform the analysis.

PUBLIC INVOLVEMENT

We appreciate the effort Sound Transit has made to engage key stakeholders and members of the public in pre-scoping and alternatives analysis. One ongoing concern is that some residents and businesses in Pioneer Square and Chinatown-International District have not yet had a meaningful opportunity to engage. Language and other barriers—including discomfort engaging with government because of the current political climate and/or

trauma associated with engaging with government in their countries of origin—create challenges to engaging our community members with traditional public outreach methods. However, these challenges are not insurmountable.

We urge Sound Transit to recognize that overcoming these barriers takes time and resources. It means meeting our community members where they are, instead of expecting them to come to us, or to you. We respectfully request that Sound Transit employ tactics that work for our community members, including:

- Review all printed and online materials to ensure they provide a basic project overview and avoid jargon so that newcomers to the project can understand.
- Continue and expand Sound Transit participation in existing community meetings by asking to send project representatives to the “CID Forum”—a monthly community meeting on neighborhood issues and concerns run by InterimCID, scheduled meetings of the Pioneer Square Resident’s Council, and other community meetings.
- Continue and expand participation in community events, such as the Night Market run by the Chinatown-International District Business Improvement Area and the Lunar New year celebration.
- Hold outreach events outside Union Station during rush hour.
- Staff at table at Hing Hay Park and Uwajimaya.
- Ask family association boards to share project information with members. (A family association is an organization formed by people who share a common ancestor or surname. In the Chinatown-International District, there are multiple family associations, including the Luke and Gee How Oak Tin Family Associations.)
- Attend community organization board meetings, particularly in Pioneer Square (the Downtown Emergency Services Center, Chief Seattle Club, Seattle Indian Health Board, Navigation Center, Friends of Little Saigon, etc.)
- Place translated outreach materials inside resident buildings.
- Offer multiple engagement opportunities including more online information for those who can’t attend meetings.
- Place material on the trains coming into and out of the International District Station, King Street Station, and on buses and bus stops that pass through the area.

Finally, we request that Sound Transit create opportunities for the Chinatown-International District and Pioneer Square neighborhoods to inform design prior to draft EIS publication. Continuing and expanding outreach efforts during the development of the draft EIS will improve the likelihood of bringing the residents, businesses, and other community members along in the process. We believe this will help the project stay on schedule and deliver value and opportunity for all transit users and community members in 2035 and 2135.

Thank you for the opportunity to provide comments on the scope of the EIS. Historic South Downtown looks forward to continuing to develop a collaborative working relationship with Sound Transit to shape the West Seattle/Ballard Link project.

Sincerely,

Barry Blanton, Blanton Turner

Teresita Batayola, International Community Health Services

Lisa Howard, Alliance for Pioneer Square

Kathleen Barry Johnson, Historic South Downtown

Denise Moriguchi, Uwajimaya

Tomio Moriguchi

Savitha Pathi, SAG member, Trustee, Wing Luke Museum of the Asian Pacific American Experience

Beth Takekawa, Wing Luke Museum of the Asian Pacific American Experience

Maiko Winkler-Chin, SCIDpda

Larry Yok, Trustee, Wing Luke Museum of the Asian Pacific American Experience

Attachment A

The Pioneer Square and Chinatown-International District neighborhoods have engaged in multiple studies and community planning processes to define our priorities. The following are links to these studies and plans.

Neighborhood, municipal, and regional plans:

[Pioneer Square Streetscape Concept Plans](#)

[Pioneer Square Parks and Gateways Project](#)

[Pioneer Square 2020 Neighborhood Plan and Updates](#)

[Pioneer Square Active Streets Strategy Report](#)

[1998 Pioneer Square Neighborhood Plan](#)

[CID Public Safety Task Force Recommendations](#)

[2008 Economic Development Study \(CID OED\)](#)

[King Street Station Multimodal Hub Health Impact Assessment \(2011\)](#)

[Jackson Hub Project Concept Report](#)

[King Street Station/Union Station Square Concept Plan](#)

[Imagine Greater Downtown Big Ideas](#)

[Seattle Chinatown-International District 2020 Healthy Community Action Plan](#)

[Measuring Neighborhood Air Pollution \(nearby study\)](#)

[South Jackson Street Connections Final Report \(2016\)](#)

[Livable South Downtown Overview \(2009\)](#)

[Livable South Downtown Planning Study Executive Recommendations \(2009\)](#)

[Livable South Downtown Background Report \(2006\)](#)

[2017 Parks and Open Space Plan \(Seattle Parks and Recreation\)](#)

[Seattle 2035 Growth and Equity \(Seattle OPCD, 2016\)](#)

[Stadium District Concept Plan \(2012\)](#)

[Seattle 2035 Comprehensive Plan \(2015-2035\)](#)

Where appropriate, HSD requests Sound Transit adhere to the following neighborhood-specific design guidelines when developing the alternatives for the WSBLE project:

[International Special Review District Design Guidelines \(DON\)](#)

[Pioneer Square Prism Glass Design Manual](#)

[Pioneer Square Preservation District Guidelines](#)



HISTORIC SOUTH DOWNTOWN

VIA ELECTRONIC MAIL

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

RE: Comments on the DEIS for West Seattle and Ballard Link Extensions Project

Dear Ms. Swift:

The Board of Directors and staff of the Pioneer Square International District Community Preservation & Development Authority (dba Historic South Downtown, *hereinafter* HSD) are pleased to provide these comments on the Draft Environmental Impact Statement (“DEIS”) for the West Seattle and Ballard Link Extensions Project (“the Project”), notice of which was issued on January 28, 2022.

On April 26, 2022, the HSD Board of Directors voted to approve the content of the following letter and appendixes, with a vote of 10 yeas with 2 abstentions.

HSD supports the extension of light rail to West Seattle and Ballard, fulfilling a key part of the Sound Transit 3 program approved by voters in 2016. The WSBLE project will transform the region’s light rail system and the Chinatown-International District (CID) and Pioneer Square (PSQ). The project carries the potential to create a more connected, accessible regional transportation hub in South Downtown, improving access for commuters using light rail, the Sounder, Amtrak, Seattle Streetcar, Metro, Greyhound, Community Transit and Pierce County busses, and WSDOT Ferries. HSD supports this vision.

In the following, we outline our concerns over the serious, permanent damage posed to the CID by the 5th Ave. S. (CID-2a and 2a Diagonal) options, and the potential for the development of a vibrant, connected regional transit hub with 4th Ave. S. shallow (CID-1a) alignment. We ask the Sound Transit Board of Directors to center the priorities and needs of the equity-seeking communities of color in South Downtown. Our comment letter consists of this cover letter and three appendixes.

HSD AND SOUTH DOWNTOWN HISTORIC DESIGNATIONS

HSD was created by the Washington State Legislature in 2007 to preserve, restore, and promote Seattle's historic PSQ and CID neighborhoods. HSD exists to help the neighborhoods of PSQ and the CID mitigate and recover from the effects of large public projects. We are governed by a board of directors drawn from the community, elected to represent local businesses, residents, government, arts organizations, non-profits, and historic and cultural organizations from both neighborhoods.

Each neighborhoods contains a core area listed in the National Register of Historic Places, and an overlapping, slightly larger area protected by local historic district designations and related preservation regulations. The National Register (NR) boundaries show that Union Station, the existing ID/C light rail station, and the ID/C plaza are within the Pioneer Square NR district. Maps of the local historic districts show that these areas are contained within both the Pioneer Square Preservation District and the International Special Review District. Additionally, Union Station is individually listed in the National Register of Historic Places.

SOUTH DOWNTOWN – DIVERSE, HISTORIC COMMUNITIES

PSQ and CID are home to Indigenous people, non-English speaking households, immigrants and minorities at higher rates than other Seattle neighborhoods, and higher than any other communities along the proposed Ballard or West Seattle alignments. Both neighborhoods support a high percentage of small, locally-owned businesses, which contribute to the vibrancy of the communities and attract visitors from around the world. The core of the Chinatown historic district is strongly connected to the immigrant Chinese, Japanese, and Filipino communities. A late 2020 survey of businesses in the historic district found that more than 67% meet multiple definitions of "small business" and 88% are Black, Indigenous, or People Of Color (BIPOC)-owned.

Both neighborhoods are at an exceptionally vulnerable point in their 100+ year histories. The COVID-19 pandemic, 2020 protests against racial injustice and police violence, and an epidemic of anti-Asian incidents disproportionately impacted our neighborhoods. The crisis of houselessness that affects all of Seattle and the region is particularly acute in our neighborhoods, particularly in PSQ with its disproportionate concentration of service providers.

Both communities have experienced decades of highly disruptive public infrastructure projects. A consistent theme of these projects is that they generate benefits regionally while the burden of negative impacts is felt primarily locally. In recent years, the projects include construction and operation of two stadiums, the SR99 Deep Bore Tunnel, First Hill and Center City Connector Streetcars, Seawall, Seattle Waterfront and demolition of the Alaskan Way Viaduct, and utility upgrades. All of this has taxed our resources and exposed us more than ever to the corrosive effects of displacement and gentrification.

Despite the challenges PSQ and CID communities face, our neighborhoods are resilient. Although the COVID-19 pandemic and racialized violence have stymied small businesses and sent residents indoors for more than two years, currently we are witnessing the glimmers of an enduring community. The restaurants and cafes are seeing customers return. Neighbors are once again gathering in Hing Hay Park to practice tai chi or play a round of ping pong. Work continues to implement the Jackson Hub Concept Plan, a community-led effort to create a

welcoming, safe area at S. Jackson St. between 2nd Ave. S. and 5th Ave. S., where the two neighborhoods meet.

Although the Omicron surge in January delayed the traditional Lunar New Year celebration, community members and people from across the region will gather on April 30 to celebrate together. Long-closed upper floor businesses are returning to PSQ, and Occidental Park is filling its once empty tables with people grabbing lunch or coffee amongst the mature London Plane trees and historic buildings. The interplay between local businesses, residents, visitors, employees, and the celebrations, traditions, festivals, seasonal rhythms and stories has built two unique neighborhoods rich with intangible cultural heritage.

In the early planning of the Project, the City of Seattle and Sound Transit identified the CID as the only neighborhood within a half-mile of the representative alignment with a concentration of communities of color greater than the citywide average, and therefore subject to specific focus and support through the Racial Equity Toolkit (RET). Our neighborhoods—historic, iconic, and home to multigenerational, multilingual, socio-economically diverse Seattleites—deserve this protection and support.

RACIAL EQUITY AND ENVIRONMENTAL JUSTICE

Like communities of color across the country, the CID and PSQ have been harmed by more than a century of public projects and policies that have, at best, failed to center communities of color and low-income residents, and at worse, baked racist policies into the infrastructure of South Downtown.

Sound Transit and the City of Seattle have partnered to use the RET in the planning and construction of the Project. In relation to the CID, the RET states the joint intent of these public entities is to 1) limit harmful impacts of the project and work with impacted communities to identify opportunities to repair past harm; 2) maximize connection for all users; and 3) [ensure] community shapes decisions that impact them, through self-determination and with a 100-year vision for future generations.

The National Environmental Policy Act (NEPA) does not require an effort as detailed as the RET, but it does require an evaluation of whether the Project would result in disproportionately high and adverse effects on minority and low-income populations, and require Sound Transit's engagement with these populations to encourage their active participation in the planning process. The RET is also consistent with Executive Order 12898, and therefore with the purpose of the Environmental Justice analysis.

To ensure the RET/Environmental Justice analysis appropriately acknowledges the cumulative harm caused by more than a century and a half of public policies and infrastructure projects based in systemic racism, HSD has compiled a list of examples, attached here as Appendix A. Please note that as with many instances of systemic racism, some of these events were initiated to have positive and protective impacts but unintended consequences arose that created new barriers or disproportionate problems for the BIPOC community.

Also please note that while the Environmental Justice analysis references these impacts in the narrative, it does not include them in the documentation of the analysis that led to an Environmental Justice conclusion of no disproportionately high and adverse impact (Appendix

G, Table 5-4, pages 5-31 through 5-66). This conclusion is clearly wrong, as is made obvious by the analysis included in this submission. See *infra* and attached Appendix A.

UNDERSTANDING PAST HARMS AND BROKEN PROMISES

The RET and the Environmental Justice appendix of the DEIS both seek to address past harms and help to involve community in planning to avoid disproportionate impacts on communities of color. We believe it is important to spell out what some of those past harms have been, and to recognize how more modern projects have allowed systemic racism to overcome stated positive goals, to ignore community priorities, and to break promises made to communities of color. For that reason, we have listed examples of racist practices, attacks, incidents, redlining, and even well-intentioned policies that have increased barriers, going back more than a century. See *Appendix A*.

Union Station was built in 1911 and brought the Oregon and Washington Railroad regional rail into south downtown. It served until 1971, when Amtrak consolidated into King Street Station. Early planning in 1973 began to explore using a facility designed to handle thousands of passengers for multimodal transit. It was studied again in 1985, 1989, 1992, and finally 1998 when it became the headquarters for newly-formed Sound Transit. The building is still underutilized, even after almost 50 years of studies. While return of passenger rail access to the building is listed in the DEIS as an adverse impact due to construction disruption and partial property acquisition, we believe that a thoughtfully-designed adaptation could return integrity of use, feeling, and association to this iconic building that stands as an entrance to downtown Seattle and the intersection of two historic districts.

In numerous outreach activities over the course of the WSBLE project, Sound Transit staff have engaged the community in visioning exercises to surface community priorities and goals. *These outreach efforts were required and necessary* in the context of this ambitious transit project. However, for many people in South Downtown, the overwhelming feeling is that *we have been here before*.

In 2019, the City of Seattle, Sound Transit, and King County agreed—at the request of a coalition of South Downtown stakeholders—to partner with us to review past outreach outcomes and consolidate what community members have been saying for the past 20 years about our interests, needs, concerns, and priorities. This review revealed remarkable consistency over the course of decades. The City, Sound Transit, and King County also agreed to incorporate many of these neighborhood self-defined priorities into future projects plans that affect our communities—including this Project. These priorities are:

1. Retain or increase community ownership of properties
2. Improve public safety
3. Enhance community vitality and sustainability
4. Encourage economic development
5. Enhance public health and well-being
6. Acknowledge and address historic racism that has and continues to impact neighborhoods
7. Minimize cumulative harm to and/or displacement of existing businesses, residents, and nonprofits
8. Activate common areas

9. Increase economic diversity in businesses and residents
10. Improve mobility and connectivity
11. Retain historic and cultural character
12. Support a small business environment
13. Ensure that people across Seattle and the region continue to visit the neighborhoods, even during construction

In recent years, Seattle, King County and Sound Transit staff have worked with PSQ and CID stakeholders on implementing the Jackson Hub Concept Plan, published in 2019. This is an example of ways that governmental units are working to center community priorities and accomplishing shared goals. However, there is still no actionable result from the Concept Plan work. The RET is another opportunity for our governmental partners to illustrate support of equity-seeking communities and demonstrate that promises will be kept.

To ensure that Sound Transit and the City of Seattle meet their stated outcomes of: 1) limit[ing] harmful impacts of the project and work with impacted communities to identify opportunities to repair past harm; 2) maximiz[ing] connection for all users; and 3) [ensuring] community shapes decisions that impact them, through self-determination and with a 100-year vision for future generations, the DEIS must center the values and priorities of the people of the CID.

FIFTH AVE. S. IMPACTS

The proposed 5th Ave. S. alignments (CID-2a, CID-2b, and CID-2a Diagonal), would break the promises and stated goals of the RET. The direct, permanent impacts on four to six National Register-eligible/-listed buildings, with additional indirect and construction impacts on another four+ buildings and would constitute a significant adverse effect on two National Register-listed historic districts. With the addition of parks, it also results in a significant increase in use impacts under 4(f) (1 resource versus 3-4 resources).

There is an open question as to whether the long-term, direct, and indirect impacts of the 5th Ave. S. options could be mitigated at all. Is the loss of intangible cultural heritage something that could be addressed monetarily? Would mitigation programs accomplish their goals within a predictable timeline? HSD does not think so. Instead, this Project requires design that avoids the catastrophic impacts of carving up two blocks of the CID.

A 4th Ave. S. alignment *shifts* the impacts and trade-offs for a *regional* transportation system outside of a fragile, historic, ethnic neighborhood that was red-lined into existence. The entities who would be impacted with the siting of the station on 4th Ave. S., in general, have stronger financial infrastructure to bear the burdens. A 4th Ave. S. choice would distribute the impacts equitably across the region, be primarily economic, and suited to the current mitigation guidelines.

Additionally, a station constructed between existing transit options bears the potential to smooth the rider's experience when moving between modes of transit. The 4th Ave. S. alignment would support implementation of significant parts of the Jackson Hub Concept Plan, particularly in regard to connections between neighborhoods and transit. It would increase pedestrian infrastructure and align signals to prioritize pedestrian and transit-rider experiences in this important corridor, which would have lasting benefits to both PSQ and the CID.

DEEP STATION OPTIONS SHOULD NOT MOVE FORWARD

After careful review of the WSBL DEIS, the HSD Board does not believe that either of the deep tunnel options, CID-1b or CID-2b, meet the stated goals of creating a user-friendly mass transit system and interconnected transit hub around Union Station and King Street Station. They also do not meet the community goals of connectivity between transit and the CID and PSQ neighborhoods.

We do not believe the deep options—with their elevator-only access and longer transfer times—serve to support the neighborhood or the region. Even a bank of eight elevators will be unable to keep up with crowds during major events (e.g., football, soccer, or baseball games, or Lunar New Year), or when there are mechanical problems. Nor will elevator-only access be viable if there is another global pandemic, making it unsafe to ride in an elevator with a non-household member. We fear that elevator-only access will lead people to disembark or transfer at a different station with less onerous transfers, undermining multiple goals for the performance of the new station. The deep options would also make light rail transportation inconvenient for residents of PSQ and the CID. With all these challenges, we believe that CID-1b or CID-2b diminish the project's purpose and need and should therefore be removed from further consideration.

DIRECT, INDIRECT, SHORT- AND LONG-TERM IMPACTS OF 5TH AVE. S. ALTERNATIVES

In 2022, if you were to stand on the plaza of the International District/Chinatown (ID/C) light rail station at S. King St., you would physically be in both the CID and the PSQ historic districts.

Around you, the ID/C station plaza is bordered by the early 20th century brick architecture of Union Station, and steel and glass architecture of early 2000s development. The 1990s ID/C plaza has brick paving and steel trellis superstructures, with art and poetry elements worked into the plaza so subtly that they have been forgotten. The steel and glass architecture of the buildings to the south and west of the station house some of the only chain food businesses within the two historic districts. The glass reflects the historic buildings across 5th Ave. S.

To the east, you see the heart of Chinatown, framed by the Historic Chinatown Gate. It is an active commercial area, but one still recovering from the coronavirus pandemic and the attendant rise in anti-Asian violence.

Storefronts along 5th Ave. S., particularly north of S. King St., have suffered from the lack of commuter and daytime business traffic, but the small storefronts along S. King St. are still active. The corner building houses Joe's Bar, a small local dive that has been a tavern or bar dating back to at least 1938 – five years after the end of prohibition - when it was Mrs. Ko Nishiyama's Beer Parlor. A few storefronts down S. King St., Seattle's Best Tea, a Taiwanese tea and boba shop that has been open since 1996 in a space that used to house a billiards parlor and a Thai market, but that now serves boba devotees. These anchors support traffic to new businesses like Chung Chun Rice Dogs, which opened in one of these smaller, affordable spaces, and which is something of an Instagram sensation

South of the Gate, the Publix is a 21st century success story, rehabilitated from its early single-room occupancy hotel configuration to a market-rate apartment rental, with a new apartment

building on the south, complementing the historically contributing architecture. Both Publix buildings, along with the commercial buildings to the north, have ground floor retail, small local businesses contributing to the vibrant entrepreneurial community of the CID.

Behind the Publix is a parking lot and a low, one-story brown stucco building with a striking blue tile roof - the old Uwajimaya grocery store - now known as the Nagomi Plaza. Behind the Nagomi Plaza is the new Uwajimaya, a multi-story building with apartments rising above the grocery store, food court, and a few other small businesses that activate the street fronts.

Most of this area is either owned or occupied by local, minority families, who have built up businesses, educated children, and passed on a commitment to the CID community.

What will this neighborhood look like in 2042?

Per the DEIS, if either CID-2a or CID-2a diagonal are built, the locally-owned parcels will have been purchased by Sound Transit. A ventilation tower and emergency exit structure will sit in the middle of what had been the Nagomi Plaza parking lot. The rest of the block between the back of the Publix, 6th Ave. S. and S. Weller St. will be vacant. The station entrance will sit across the street, on another almost completely vacant lot, with bike storage and another empty lot at the opposite corner of that block. The community will be working to define what happens next. At that point, how will the potential TOD plan incorporate the communities' long-stated priorities? Once the Historic Chinatown Gate is surrounded by empty lots, how will Sound Transit engage to restore the intangible cultural heritage that was lost along with the buildings and businesses?

Economics and Cultural Practices are Intertwined in Chinatowns

The DEIS acknowledges that the CID has strong social cohesion, as well as high risks for displacement, defining neighborhood cohesion as "the extent to which residents have a sense of belonging to their neighborhood ... consider[ing] the interactions between the residents and the resources in the neighborhood" (DEIS 4.3.4.1.1; 4.3.4.3.3).

Chinatowns have always been a combination of economic participation in white culture while being refuge from that dominant culture. The space that mediates this relationship for a group that has been deemed a perpetual "other" is imbued with intangible cultural heritage: traditions, manifestations, and living expressions of living culture, knowledge, and skills, including languages and festivals.

Seattle's CID is unique in bringing together Chinese, Japanese, Filipino, Vietnamese, and Cambodian immigrants together in a space that defined by their "otherness" but which has built that identity into a strength of community identity. Unlike any other neighborhood along the WSBLE corridor, the CID provides a space for belonging through culturally-competent social services, recreational and cultural spaces, and culturally-relevant small businesses.

The CID houses a tradition of immigrant entrepreneurship, often transferred down generations, creating family wealth and stability that was otherwise impossible for Asian immigrants to access. Economic and cultural impact cannot be considered separately from one another in this neighborhood.

CID-1A, 4TH AVE. S. SHALLOW, ALIGNS WITH COMMUNITY PRIORITIES AND AVOIDS HARMFUL IMPACTS TO COMMUNITIES OF COLOR

The 4th Ave. S. shallow option, CID-1a, is the alternative that avoids, rather than attempts to mitigate, unmitigable cultural impacts. And more importantly, the 4th Ave. S. shallow option allows Sound Transit and the City of Seattle to partner in a project that will create a thriving regional transit hub and move forward important and long-delayed priorities of the surrounding communities, including ideas proposed in the Jackson Hub Concept Plan.

The benefits of a 4th Ave. S. shallow option will benefit the community and the region by truly fulfilling a 100-year vision. It will:

1. **Improve mobility and connectivity:** shallow options mean easier and more convenient transfers between light rail lines and easier access to other transportation modes. A 4th Ave. S. alignment provides direct transit connections to both the CID and PSQ neighborhoods, as well as the most direct connections to Sounder, Amtrak, and the stadiums. With the pedestrian underpass, it improves the pedestrian experience for people using light rail or just trying to get across 4th Ave. S.
2. **Activate common areas:** CID-1a would activate Union Station by reviving its original purpose as a train station. By serving as the location for the new light rail station entrance, and a connection between the existing and proposed stations, the revived Union Station would be readied for further successful activation. However, any programming activation must be fully funded.
3. **Improve public safety:** Additional activation of Union Station, the S. Weller St. Pedestrian Bridge, and the 4th Ave. S. and S. Jackson St. intersection with pedestrians will improve public safety. This serves to enhance public health and well-being by increasing pedestrian safety and connectivity between the CID and PSQ neighborhoods. The City's Station Planning Progress Report also identifies pedestrian improvements to be made around the station, which would further increase these benefits.
4. **Minimize cumulative harm to and/or displacement of existing businesses, residents, and nonprofits:** This community priority meets the RET outcome goal, as well, and a 4th Ave. S. alignment will avoid the displacement of 19-27 small businesses in the CID along 5th Ave. S., S King St., 6th Ave. S., and S. Weller St. Additionally, by moving the core construction outside of this fragile ethnic neighborhood, the impacts of the project are shared regionally rather than locally by small, minority-owned, under-capitalized businesses.

Increasing economic diversity in businesses and residents, encouraging economic development, and retaining/increasing community ownership of properties are additional goals that are best viewed under cumulative harm, as the economic and cultural life of the CID and PSQ are intertwined. These priorities will require Sound Transit to work with the communities and the City to identify needs, barriers, and opportunities to improve the long-term sustainability and viability of these important historic neighborhoods in Seattle.

HSD aims to support a small business environment and asks Sound Transit and the City to join us in this goal, which will enhance community vitality and sustainability and retain historic and cultural character. In different ways, both PSQ and CID are neighborhoods developed by small, local entrepreneurial businesses, with their mixed-use buildings and housing residents behind and above the businesses that provide employees and patrons.

5. **Ensure that people across Seattle and the region continue to visit the neighborhoods, even during construction:** By avoiding construction impacts on 5th Ave. S., S. King St., and S. Weller St., the CID is protected from massive construction disruption, allowing the businesses, non-profits, and cultural cohesion to continue on their current path, attracting locals and visitors from around the world to visit. Similarly, PSQ would not suffer the same level of construction impacts they have faced in recent projects. The design of the construction mitigation plans will be key in achieving this goal, and communities should be involved.
6. **Acknowledge and address historic racism that has and continues to impact neighborhoods:** Appendix A has a starting list for *acknowledging* past impacts of government actions on these neighborhoods. Addressing them should be incorporated into the FEIS in the cumulative effects section, along with designed mitigation and project mitigation that attempts to leave the communities with increased equity post-Project construction.

ADDITIONAL STUDY IS NEEDED TO ADDRESS 4TH AVE. S. IMPACTS

Every effort to improve our regional transit network will involve trade-offs. As discussed above, HSD does not believe the trade-offs called for in the 5th Ave. S. options provide sufficient benefit or can be effectively mitigated.

This does not mean that the CID-1a 4th Ave. S. alignment is without substantial impacts. There are many outstanding questions that remain unanswered in the DEIS. HSD is requesting that the Sound Transit board commit to a period of additional study and transparency of 4th Ave. S., to answer these many remaining questions and allow for a thorough mitigation plan to be developed. Some specific points to highlight:

- The additional study requested is not intended to delay to the WSBL timeline. Rather, HSD requests that Sound Transit staff continue to engage with the community as it answers the questions listed below (and others that arise) so that community can be involved in the direction forward, instead of passively receiving the Final EIS next year.
- Chief among the concerns is the projected cost overrun. Sound Transit has engaged in voluntary cost refinements on other segments of the proposed alignment. It must do an aggressive refinement for the 4th Ave. S. Shallow option as well. HSD is asking Sound Transit to right size the 4th Ave. S. alignment and station within the budget and apply design strategies to shrink the cost. Apply the same kind of innovative thinking and creativity and effort used to generate the 5th Ave. S. diagonal alternative (a station proposed by Sound Transit to address the challenges they have identified for CID-2a), to explore improvements and refinements to CID-1a.

- What construction practices or design refinements can Sound Transit and City of Seattle utilize to manage detours, traffic diversions, and minimize road closures?
- Bus routes DO need to be maintained during construction. Can buses and transit be given priority on what remains of 4th Avenue during construction?
- What will the impact be on the S. Weller St. Pedestrian Bridge?
- Can the impact on Ryerson Bus Base be further reduced?
- How can haul routes be reoriented outside of the CID and PSQ neighborhoods, with their small-scale pedestrian environments, areaways, historic buildings, and concentration of human services?
- Sound Transit should address how surge events during construction can be managed. Additionally, the FEIS should address how the new CID station design will accommodate surge events in operations.

ADDITIONAL STUDY NEEDED IF 5TH AVE. S. ALTERNATIVES PROGRESS

If the Sound Transit Board decides to proceed with study of the 5th Ave. S. alignments, additional study and cost estimates for substantive, transformational mitigation must be included. These include:

- A community ownership commitment for any parcels of land designated for equitable transit-oriented development. For example, investigate the feasibility of a community land trust or other non-traditional models and creative approaches to community ownership.
- Additional study of the economic feasibility of TOD within the context of the International Special Review District regulations, considering community capacity and financing. As TOD is intended to increase density around transit hubs, but the CID and PSQ are already high-density neighborhoods, can additional density be achieved within the historic district regulations?
- An understanding of the cultural importance of small business ownership and small unofficial incubator spaces must be developed to facilitate proper mitigation and relocation packages for affected small businesses. In a small business district like the CID, businesses exist within a network of other small businesses. Relocations have ripple effects. Sound Transit needs to assess these effects or provide support for community organizations to study this, prior to settling on a mitigation package.
- Funding to support small local businesses with non-English speaking proprietors to prepare to engage in the Uniform Relocation Act, including bookkeeping and legal support, based on lessons learned engaging with Rainier Valley businesses dealing with mitigation in ST1.
- Funding for community organizations in the CID and PSQ to hire additional staffing and/or contractors and develop programs to assist their constituents and visitors to prepare for construction impacts, navigate the construction period, and advocate for community vision until the promised TOD is complete.
- Any effort to activate Union Station while siting the new station on 5th Ave. S. should include mitigation funding to operate and manage the property as long as and until the operation becomes self-supporting.
- The loss of the cultural fabric is problematic and will require creative efforts to mitigate. It is possible that community-defined metrics could be created to measure ongoing diversity and vitality of life in the CID and PSQ. Attention should be paid to forces that

promote gentrification or displacement, including median rents of residential and commercial real estate, percent of local ownership, and other indicators. Funding would be needed to define an appropriate study, to reassess periodically (every year at first, then perhaps every five years for a total of 20 years after the TOD is complete) and to provide remedies for the long-term, indirect impacts that are identified at Project outset and in the future.

Additionally, given the unique historic neighborhoods present in the CID segment of the Project, we suggest that additional analysis on cumulative effects be presented to demonstrate the impact of the largest public infrastructure project in the city of Seattle's history on the two oldest neighborhoods in the city. The past infrastructure projects in the neighborhood have benefitted a regional transportation network to the detriment of these equity-seeking communities. We applaud Sound Transit's state goal to repair past harms, and support every effort to ensure these promises are fulfilled.

CONCLUSION

Based on review of the current information, we believe that the CID-1a 4th Ave. S. shallow option offers the greatest potential to achieve community priorities, create direct connections between PSQ and CID neighborhoods, and improve transit connections between modes. However, there is a need to clarify cost, traffic and transit impacts, construction phasing and staging, and construction management plans for the 4th Ave. S. option and reengage community prior to the completion of the FEIS. We believe CID-1a comes the closest to delivering both local and regional benefit while protecting the irreplaceable cultural core of the CID neighborhoods.

HSD is grateful for this opportunity to comment on the DEIS, and the efforts of Sound Transit staff to reach out to our diverse communities. We look forward to continuing to work with Sound Transit board and staff to ensure the successful completion of the most ambitious and costly public project undertaken in Seattle's history.

Sincerely,

Kathleen Barry Johnson
Executive Director

Dana Phelan
President, Board of Directors

Attachments:

- Appendix A: Listing of past racist or racially impactful policies, projects and incidents
- Appendix B: Detailed list of DEIS comments and questions
- Appendix C: Matrix of community priorities and impacts of pending options

CC: Sound Transit Board of Directors, Seattle City Council, King County Council, The Honorable Mayor Bruce Harrell and The Honorable County Executive Dow Constantine, The Honorable Representative Sharon Tomiko Santos, The Honorable Representative Kristen Harris-Talley, The Honorable Senator Rebecca Saldaña, The Honorable Senator Maria Cantwell, Senator Patty Murray, The Honorable US Representative Pramila Jayapal, The Honorable US Representative Adam Smith



HISTORIC SOUTH DOWNTOWN

APPENDIX A Harmful Government Actions

Government Policies, Actions, Inactions resulting in inequitable and/or racially-motivated negative impacts

This list was compiled in conversation with community members in South Downtown and is not intended to be a comprehensive list of impacts on these two historic neighborhoods. We have attempted to group these examples by time and type of activity, and to give some context where possible as to the impact of the actions.

We intend this list to provide examples for guidance when the City and Sound Transit state their intent to "identify opportunities to repair past harm." To repair, one must first acknowledge and name the harm. Then one must seek to understand these communities to cease causing inadvertent harm (see "Neglect & Erasure" section below)

Overtly white supremacist measures

After the Civil War, the United States began to formalize its claims on the West Coast. Governments began making laws that preferred the rights of white, European immigrants, stigmatizing the status of being non-white, and setting the stage for 1-1/2 centuries of discrimination and marginalization. Examples of these laws include:

- 1864 Alien Land Laws (state-level)
 - Initially, taking of native property by European settlers, then prohibited or took land ownership from Native Americans and, eventually, immigrants of color, who were also denied citizenship.
- 1865 Exclusion of Native Americans from living within Seattle City limits
- 1882 Chinese Exclusion Act
 - prohibited naturalization and created first immigration exclusion based on race and place of origin. Repeatedly renewed and reinforced for 8 decades.
- 1942 Executive Order 9066
 - In addition to incarcerating Japanese immigrants and Japanese-American *citizens*, this rule also forced many to sell land, businesses, and personal property at a loss. Exceedingly few people were able to reclaim their property after the end of WWII, leading to a drastic reduction in the size of Nihonmachi.

Health and safety regulations with overt white supremacist intent, racist impacts, or unintended and inequitable consequences

Public health measures have a history of being promoted as a strategy for "encouraging" non-white laborers and entrepreneurs to return to their countries of origin. Other cases, like

protective fire codes, were well-intended but imposed a sudden and unanticipated cost of operating residential units. In Chinatown, many building owners simply stopped renting residential space, leading to housing shortages that persist to this day. Examples include:

- 1885 Cubic Air Ordinance
 - Uneven enforcement in Seattle and other west coast cities specifically targeted Chinatowns.
- 1970s Fire codes resulting from the Ozark Fire
 - Measures were necessary fire safety improvements, but implementation created additional burdens on local building owners. Many owners simply stopped renting residential spaces, leaving vacant upper floors and housing shortages that continue to this day. Inequitable access to capital for code improvements exacerbated the issues then and now.
- 2012-present City discussion of unreinforced masonry buildings seismic retrofit upgrade codes, which would place an additional burden on the PSQ and CID neighborhoods with their high proportion of URMs.

Civic improvement, infrastructure, renewal projects

Publicly funded projects, beginning well before WSBLE, have too-often been the excuse to tear down parts of the CID, destroying thriving businesses and residential neighborhoods, and creating a smaller and smaller CID. All were done in the service of “progress,” and many inequitably benefitted the larger city or region but with impacts born primarily by these two small historic neighborhoods in south downtown.

By centering on values such as modernization and other white-focused ideas, public projects in the past have labeled parts of the CID as “blighted” or in need of renewal, refusing to value the ethnic livelihoods and culture that had taken root in one of the very few places that were accessible to Asian immigrants. Examples include:

- 1910 Jackson Street Regrade
 - displaced thriving Chinese and Japanese communities
- 1928 2nd Ave. Extension Construction
 - eliminated “Chinatown #2,” which had been in Pioneer Square.
- 1941 Yesler Terrace construction
 - While creating innovative integrated public housing, took large tracts of land from Nihonmachi (Japantown) and displaced immigrants who did not have the citizenship necessary to qualify for this public housing
 - Currently being rebuilt – ongoing.
- 1949 Construction of Charles Street Yard by City of Seattle
 - Displaced thriving Chinese neighborhood.
 - Similar impacts were continued/expanded during the conversion to a maintenance facility (1963) and the addition of the Seattle Streetcar spur line (2012).
- 1970s Kingdome Construction, Operation and Demolition, Replacement by new Stadiums
 - Kingdome community impacts were intended to be mitigated by the 21 Stadium Impact Resolutions passed by the City, but **funding ran out in three years**.
 - Baseball Stadium (1997).
 - Seahawks Stadium & Exhibition Center (2000-2002).

- Operation of stadiums causes traffic congestion, transit congestion, sidewalk congestion, public drunkenness, littering, and sometimes violence, with inadequate public support to mitigate the public safety hazards. The Stadiums' governing organizations participate in a community benefits process, which is helpful, but which requires ongoing staffing and funding, even to this day.
- Transportation projects cause major construction impacts and ongoing increased pollution, degraded pedestrian services, increased traffic and "surge" events. These projects definitely delivered higher levels of service to the neighborhoods of PSQ and CID, however they are also prime examples of projects that deliver the vast majority of benefits to regional or even national interests but leave the burden squarely in the impacted neighborhoods. In the past, the design of many of these projects has created new public safety concerns.
 - 1960s Interstate 5/Seattle Freeway construction
 - Demolished about half of Yesler Terrace (20 years after it was built) removing low-income housing from the neighborhood.
 - Permanently, physically divided the CID.
 - Created a dark, damp "no-man's land" beneath the highway (at least a block wide) where homelessness and drug dealing thrive.
 - Effort to turn areas around the highway structure into greenbelts created hidden (and not hidden) camping areas, led to the development of the notorious "Jungle" encampment.
 - Removed mixed housing and industrial properties throughout the 9th Ave. S. corridor.
 - 1987-1990 Construction of Downtown Seattle Transit Tunnel (now ID/C station)
 - the PSQ headhouse continues to be a public safety concern, based largely on its design.
 - 1990s construction of Interstate 90
 - More dark "no-man's lands."
 - 2009-2019 SR 99 Tunnel construction and Viaduct demolition (2019)
 - 2012-2016 Streetcar construction, utility relocation work
 - Jackson Street, 1st Ave. S., and the 8th Ave. S. spur line – which was related to Charles St. potential redevelopment, yet to happen.
 - 2017 1st Ave. S. utility relocation in preparation of City Center Connector. Both CID and PSQ neighborhoods were promised that major City Center Connector construction-related disruptions would pay off when the entire streetcar system was connected. As of the date of this letter, the City Center Connector streetcar is stalled, and is likely never going to be built.
- Ongoing Waterfront Reconstruction
 - While the eventual public amenity created by a vibrant waterfront will benefit the neighborhoods as well as the city and region, the construction impacts and detours have been onerous for small businesses and neighborhood residents. It should be noted that while PSQ is part of a taxation Local Improvement District (LID), the existing plans for redevelopment stop at Coleman Dock and start again at Railroad Ave., skipping most of the PSQ waterfront. Planning for Pier 48 seems to be constantly out of reach, as other interests and their needs are prioritized above the neighborhood's.

Zoning and land use decisions

As with public health measures, zoning and land use decisions have often provided cover for covertly white supremacist measures (e.g. redlining), but at other times have been instituted for

all the right reasons, with insufficient thought given to unintended consequences. Examples include:

- Repeated rezoning leading to instability in Little Saigon area and the neighborhood surrounding the core historic CID
 - 2012 Livable South Downtown rezoning of Little Saigon area, followed by 2017 Housing and Livability Agenda rezoning around the entire CID
 - Increased building heights in and around Little Saigon twice in a decade caused sale of properties at escalating values that priced out local organizations and long-term property owners.
 - Raised concerns for owners of industrial and warehouse properties about how long they could continue to do business with increased pressures on their properties.
 - Necessary housing is being built without the cultural connection and community ownership that will maintain the vitality and identity of Little Saigon.
 - Overall, community organizations in both PSQ and CID support additional housing affordability, but inequitably bear the burden of this increase when compared to many primarily residential neighborhoods in Seattle, with the unintended consequence of creating a concentration of low-income housing.
- Concentration of human services – city and county policies during 1960s-'70s public policy shifts, consolidated major human services, courts, public safety activities in PSQ.
- 2018 Expansion of International Special Review District
 - Expansion extended the district east from 10th Ave. S. to Rainier without sufficient outreach to local businesses and property owners, resulting in feelings of erasure, confusion, and concern within the community.

Neglect & Erasure

Many of the above examples could also be classified as attempts at erasure. As a red-lined, marginalized community, the CID and PSQ are rarely afforded the attention regularly offered to less diverse areas with fewer minorities and immigrants. Constantly needing to assert one's right to inhabit parts of the city causes generational trauma, suspicion of government intent and disenfranchisement from civic process. Examples include:

- Lack of basic maintenance – areaways, alleys, utilities, curbs and streetscapes, landscapes have not been consistently maintained by the City.
- The accidental elimination of Manilatown. In 2017, Seattle sought to define the CID by ordinance, and neglected to include the history and extant vibrancy of the Filipino community. While Manilatown was added to the bill in a subsequent measure, the need for a people to combat erasure has left an emotional toll.
- No street under Canton Alley for 100 years – paid for by community.
- Lack of culturally responsive public safety and related services – the International District Emergency Center began in late 1970s to fulfill this need.
- Failure to include PSQ in many of the measures and evaluations in the WSBLE DEIS. Even though Union Station, Union Station Plaza, and the existing ID/C station are under the jurisdiction of the Pioneer Square Preservation Board, and most of PSQ is within a 10-minute walkshed, documents and presentations rarely include PSQ by name. As a result, PSQ stakeholders find themselves – in 2022 – needing to assert their existence and ask for consideration to avoid harm.

APPENDIX B: DETAILED LIST OF HSD'S DEIS COMMENTS AND QUESTIONS

Document/Section	Page or Section	Question or Comment	Question or Comment
Acquisitions, displacements, and relocations	4.3.14	C	Consideration of the impact of business displacements should be given with special attention to businesses owned by people of color, immigrants and non-English speakers. Experience in the Rainier Valley during ST 1 has showed that these types of small businesses are vulnerable to under-estimates of the business value, cost of relocation, and reimbursement for lost business. This may be due to informal accounting practices or other factors. Sound Transit's determination of Relocation Assistance or Mitigation should include a rigorous and low-barrier valuation process, with a focus on working with minority and non-English speaking business owners.
Alternatives Considered	2-88	Q	DEIS states cut-and-cover methods will be used to build CID-1a and 2a alternatives. Why does the extent of rebuilding the 4th Ave. S. bridges extend all the way to Main Street? Why not engage in mining the tunnel closer to S. Jackson St.? What is driving the bridge rebuilding north of Jackson?
Alternatives Considered	2-88	Q	DEIS states that deeper stations will be mined. What is driving the surface bridge and roadway impacts for CID-1b (4th Ave. S. deep) if the station for that segment would be mined? Why will there be more substantial impacts to 4th Ave. S. bridges if that station will be mined?
Alternatives Considered	2-91	Q, C	DEIS discloses approximate amount of area necessary for construction staging areas and easements, but the document does not indicate any construction footprint outline. Where is Sound Transit assuming construction staging COULD occur for the project within the CID segment? The property impact maps provided in Appendix L.4 do not indicate what the properties are used for, or the extent of the use (full or partial acquisitions). Where are the property impacts or assumptions for construction staging?
Alternatives Considered		Q	What is the capital cost of CID-2a diagonal? Are there cost savings realized for not having to disturb all the utilities of CID-2a? What about all those properties?
Appendix L4.1 Acquisitions	Maps and tables	Q	What is the assumed disposition of the parcels along 4th Ave. S. that would be completely disturbed for CID-1a and 1b and the site of a proposed tunnel ventilation building?
Appendix L4.1 Acquisitions	Maps and tables	Q	Would CID-2a, diagonal, or 2b result in the demolition of the Nagomi Plaza (old Uwajimaya) building? ST # BD 5021
Appendix L4.1 Acquisitions	Maps and tables	Q	Would CID-2a, diagonal, or 2b result in the demolition Seattle First National Bank building itself? ST # BD 5027
Appendix N.1	6-1, 6-25 - 6-36	C	Evaluation of transit integration at the ID/C station should be part of the decision to site the station either on 4th or 5th. Evaluation of transit integration needs to include all Link lines, all bus lines, Sounder, Amtrak and WS Ferris. The Jackson Hub Concept Report and integrating work done since 2000 should continue to be referenced and consulted during station area planning.
Appendix N.2 Visual Quality Technical Report		Q	Why wasn't Hing Hay Park and Union Station evaluated for operational impacts of having a tunnel ventilation system in the viewshed?
Appendix N.5 Historic and Archeological Resources Technical report		Q	Why wasn't the Nagomi Plaza building (eligible for listing on NHRP) evaluated under Section 106? ST # BD 5021

CE	7	Q, C	Without more detail regarding the statement that "the project would remove some of the residential and commercial land uses that created demand for this parking," it is unclear what this means for CID, which would experience a permanent loss of parking. What are the land use changes in CID that would correspondingly reduce parking demand? Or is this based on looking at parking loss vs. land use change for the entire project corridor? If its the latter, we have serious concerns, as this type of analysis is neither accurate nor relevant to EJ impacts.
CE	7	C	The conclusion that the changes to the transit system would reduce the need for parking in the study area is inappropriate without a parking study. In the C-ID, for example, anecdotal evidence suggests that short-term parking (on-street, <2 hour) is used by people making trips to the C-ID to shop, visit residents, dine in a restaurant, drive a senior resident to/from appointments, etc. Transit may not be an appropriate or reasonable alternative mode for many of these trips.
CE	8	Q	What are the construction projects that would take place in the CID and PSQ during the ST construction period? Would SDOT continue to issue street use permits for private construction that severely limit already constrained travel and parking for these neighborhoods?
CE	9	C	In response to point that relocations may not necessarily be in the same neighborhood, it must be noted that place is critical to CID; if people are relocated from CID, this could materially impact community cohesion. (on the other hand, we should examine the ICON building resident makeup and determine the extent to which this building contributes to community cohesion)
CE	10	Q	Per earlier comment, relocating in project vicinity is less important in CID than relocating within CID. What is the retail and office vacancy rate in the CID?
CE	10	C	Given history and the lack of policies to control/manage gentrification/cost increases in Seattle neighborhoods, it is likely that WSBL would contribute a cumulative impact to already fragile businesses in CID and PSQ.
CE	11	C	In the CID and PSQ, it is as much about year after year of construction impacts--plus racialized violence and pandemic that disproportionately impacted BIPOC, seniors and unhoused people--as it is about simultaneous construction projects. This should also be addressed in Cumulative Effects.
CE	11	C	In response to the conclusion that neighborhoods becoming more expensive is an indicator of economic growth (and the implication that this is a benefit), this may be true from a macro standpoint, but from an EJ standpoint, economic growth that primarily benefits the most affluent does not offset disproportionate impacts to the least affluent.
CE	12	C	In response to this conclusion--"as neighborhoods revitalize, amenities and community resources also often improve, which can increase the quality of life for both new and remaining members of the community,"--from an EJ and community standpoint, these assumptions are highly problematic. A community value that was heard over and over again in the 20 years of plans and studies in the CID and PSQ was the importance of retaining community ownership and not displacing people descended from families who have lived in these neighborhoods for generations, and not displacing businesses that have existed for generations. From an EJ standpoint, this whole paragraph represents a high and adverse disproportionate impact, not a benefit.
CE	13	C	The conclusion that changes as a result of the project would cumulatively benefit neighborhood is only an EJ benefit if the local businesses and residents can hang on during construction and don't find themselves priced out after (or evicted for redevelopment).
CE	13	Q	Regarding relocations, need to understand if the proposal is to relocate within the "project vicinity," i.e. the whole corridor, or the neighborhood where these originated? From an EJ standpoint, these need to be relocated to the same neighborhood to continue meeting the need.
CE	14	Q	Need more detail on how ST's Equitable TOD and the City's Mandatory Affordable Housing requirements would play out in CID and PSQ. Is this a commitment, or just hopes and wishes? What--if any--proof of concept to City of Seattle and ST have with these complementary programs? How will historic district regulations impact this program?
CE	24	C	RE: "most cumulative impacts would occur during project construction," we disagree with this statement. The cumulative effects of gentrification and displacement are related as much to operations as construction and has been grossly understated in this document.

CE	Global	Q	What is the status of the viaduct structures on 2nd Ave. Ext. S. and S. Jackson St.? Sound Transit needs to include the potential foreseeable need to renovate these neighboring structures in their Cumulative Impacts analysis, including an assessment of the impact on rebuilding these bridges on the 4th Ave. S. structure and any potential need to tie back those bridges to 4th. Information from SDOT's bridge inventories should support this study.
Economics	4.3.3-14	Q	Economics analysis indicates that Uwajimaya loading dock, entry plaza, and parking garage would be affected temporarily by construction activities, but the transportation analysis doesn't disclose impacts along 5th or 6th Avenues extending south of S. Weller Street. What construction activities would occur that would disrupt the loading dock and parking garage?
Economics	4.3.3-14	Q	Is the DEIS analysis treating private parking lots (surface and sub-surface) as business displacements, or only accounting for them in the "loss of parking" analysis in the transportation section? Is the economics analysis treating the Union Station parking garage, 6th and King surface lot, and Bank of America lot as businesses? Considering it an impact? Temporary displacement?
EJ	97	C	No mention of PSQ in the economics section. Surely there are economic impacts on PSQ as a result of cumulative construction impacts, parking removal, traffic diversion, etc.
EJ	Global	C	No mention of public safety anywhere in this document. This seems like an oversight; public safety (defined in multiple ways, including safety from racialized violence, bike/ped safety) is of high importance to the CID and PSQ
EJ	102	C	Even temporary displacement of some residents could impact community cohesion. While this is a fragile neighborhood, community cohesion is strong and potentially a key factor in the neighborhood's survival. This section does not adequately address the impacts of relocations/displacements on community cohesion. That said, we are not yet convinced that displacement of ICON is going to be impactful on community cohesion, given the makeup of building residents
EJ	102	Q	Has ST met with resident from Eagle Village to understand how this relocation would impact them?
EJ	102	Q	Why PSQ is not included in this discussion. What are the potential impacts of traffic diversions, 4th ave closure, streetcar disruption to community cohesion for PSQ?
EJ	102	C	The social section should mention the risks of gentrification (see Central District as example) and how that would impact community cohesion.
EJ	106	C	RE: "No additional impacts" (Visual Effects). This is incorrect. There would be a large tunnel vent facility placed directly in front of Union Station under Options 1a and 1b.
EJ	109	C	RE: "No airborne noise impacts." This is not correct. According to the Noise and Vibration Technical Report, ST <u>did not test for noise impacts</u> in the CID because it considers it to be a "commercial district," even though it acknowledges there are residential properties nearby (e.g., Publix, Uwajimaya, Downtowner, Hirabayashi Place). We disagree with the conclusion that because City of Seattle treats residential use properties within commercial districts the same as commercial properties, Sound Transit is not obligated to test and mitigate for noise impacts to these residences. See page 127 of the Noise and Vibration Technical Report for reference.
EJ	114	C	PSQ and CID are unique along the corridor in that they host a number of public services for cultural communities and unhoused individuals. Those should be mentioned here and the potential impacts on them detailed
EJ	116	C	The conclusion that impacts to historic resources will affect minority people the same as everyone else is wrong. The CID is the only neighborhood along the alignment with impacts to historic properties (according to this table), and these properties are of particular importance to minority communities.
EJ	118	C	Construction impacts and visual impacts to the viewshed to Hing Hay Park should also be mentioned in Social section (impacts to community cohesion).
EJ	Table 5-4	C	No indirect or cumulative effects row? Why not? This is a major impact on EJ--even the RET says this.

EJ	Table 5-4	C	The economic analysis does not address the loss of cultural context for the businesses that will be relocated under CID-2, or appropriateness of replacement buildings, particularly in terms of the community priorities of local ownership, loss of affordable storefront spaces such as the existing ones that serve as an incubator for small, locally owned businesses. New ideas need old spaces because they are affordable. The "mom and pop" business needs affordable spaces too. The economic analysis of the impact on the CID, for all the CID-2 options (5th Ave S) must include the long-term impact on the type of businesses that are currently located in the CID.
EJ	Table 5-4 pg 5-40	C	The land use analysis assumes that the replacement of current buildings with new TOD buildings will be a benefit to the neighborhood and the BIPOC populations living there. This is not a reasonable conclusion when the buildings to be replaced are already owned and occupied by many minorities. Local ownership is a key priority for the community and is seen as a way to ensure the cohesiveness of the area. The land use analysis should not tout replacing minority and locally owned parcels with other developments that are unlikely to return to community and minority ownership.
EJ	125	Q	Mis-characterization of "offsetting benefits" in Environmental Justice analysis: The U.S. Environmental Protection Agency and Federal Transit Administration permit agencies to consider "offsetting benefits" when drawing a conclusion about whether a project has a disproportionately high and adverse impact on environmental justice populations. To count as an offsetting benefit, however, the positive effect needs to <u>disproportionately benefit the affected populations</u> . According to the Environmental Justice analysis, Sound Transit considers better access to transit and job centers to be an offsetting benefit for the residents of the Chinatown-International District. We disagree.
EJ	130	C	The new light rail station in the Chinatown-International District will enhance a regional transit hub, connecting people from all four corners of the region with buses, commuter rail, and Amtrak. While residents of the Chinatown-International District will partake of this benefit along with everyone else in the region, they will not gain substantially more benefit than anyone else in the region. On the other hand, they will bear the brunt of the impacts of constructing and operating this facility. Consequently, we do not believe it is appropriate to consider access to transit and job centers to be an offsetting benefit.
EJ	7-2	C	If, as the DEIS says "Sound Transit is partnering ... to evaluate strategies to maintain and enhance community cohesion" why are we not reading about existing strategies that may be considered in this? Why are we not reading about the ways in which ST and the city work together on planning in this? The lack of even rudimentary process discussions in these sections do not give community confidence in the future work of these processes.
General Analysis	Global	C	Inconsistency in use of high-cost and low-cost project assumptions: The technical analyses in the DEIS do not use the same high-cost and low-cost project assumptions. For example, the Economics analysis of the DEIS (pages 4.3.3-1 through 4.3.3-13) indicates that Sound Transit used CID-2a for both the high and low-cost project value to estimate the number of job years (employment) and direct expenditures resulting from the Project. Elsewhere in the economics analysis, CID-1a is listed as the high-cost project alternative in the CID segment. This results in an apples to oranges comparison of benefits generated from employment and local revenue. Similarly, in the Air Quality analysis of the DEIS, "CID-1a" is used as the alternative evaluated for Air Quality standards (page 4.3.6-3), but on page 4.3.6-7, the "low-cost scenario includes CID-2a..." and the "high-cost scenario includes CID-1a.". These differences result in markedly different Greenhouse Gas emissions, again resulting in an apples to oranges comparison. Sound Transit should update its analyses in the Final EIS to address these inconsistencies.
General Analysis	Global	C	Need for more clarity on construction footprint: The DEIS discloses approximate amount of area necessary for construction staging areas and easements, but does not show a construction footprint outline. The property impact maps provided in Appendix L.4 do not indicate how the properties would be used or the extent of the use (i.e., full or partial acquisitions). Without more clarity on where construction staging would occur or the assumptions of property impacts for construction staging, we cannot adequately assess or compare the impacts of construction to the Chinatown-International District.

General Analysis	Global	C	The CID-2a diagonal station configuration appears to have markedly different impacts than the CID-2a configuration, and the track path varies between the two options. There are no graphics at a reasonable scale in the draft EIS that illustrate the distinctions between the two options. More explicit treatment of 2a-diagonal as a separate condition should occur so that people can clearly see what amounts to real differences between roadway impacts, property impacts, business impacts, and so on. It is not included in all appendices.
General analysis	Global	C	The over 70 sporting events, concerts, and other events at the stadium complexes was not considered in the DEIS, despite community requests in the scoping phase of the Project. Additionally, PSQ and the CID have festivals and other events that bring thousands to the neighborhoods. These "surge" events and the traffic they create (both vehicular and transit), must be included and evaluated for their effect on the systems both during construction and long-term.
Historical/Archaeological	4.3.16	C	Area of potential effect needs to be expanded to include potential haul routes for preferred alternative in terms of mapping areaways, as the maps will help determine where haul routes can be placed without additional street reinforcement, an additional cost to the project if necessary.
Noise	127	C	"Commercial and industrial districts are in the Chinatown-International District Segment... Although there are no nearby residential districts near the segment there are mixed use properties with residences in commercial districts, such as Uwajimaya and the Publix Hotel. Residential use properties within commercial districts are treated the same as commercial properties within the city of Seattle." While this may be an acceptable policy by noise analysis standards, it should be unacceptable from a RET standpoint. ST should be expected to conduct a noise analysis of impacts to residential properties and commit to mitigation for those impacts.
Noise	4.3.7-11	Q	For Table 4.3.7-3, what is the distribution of impacts by property? The figure only shows two areas (along 5th near Weller and Washington)— what is the distribution of impacts, and by option? 2a vs. 2a-diagonal?
Noise (N.3)	Global	Q,C	No operational noise analysis was conducted for the CID segment, and therefore for the CID neighborhood, because tunneled options were not considered in the analysis. However, tunnel ventilation systems are identified within the neighborhood, and will be a new source of noise and visual blight. What are the potential noise impacts to surrounding residents and park users from operating a tunnel system at the proposed location?
Noise (N.3)	6-37	Q	For construction noise impact analysis, ST and analysts assumed CID neighborhood is a commercial/industrial neighborhood, and treated "residential use properties the same as commercial properties" per City of Seattle codes. Does this mean that residents were not considered explicitly in the analysis in the same way they would be if their home was located in a residential neighborhood? Please explain.
Noise Figure 4.3.7-2	4.3.7-7	C	Visuals do not show the diagonal station configuration nor track alignment, which differs from CID-2a through the CID neighborhood. Difficult to discern or understand impacts without understanding the layout and analysis.
RET	10	Q	What is ST and the City's legal obligations to fulfill the commitments outlined in the RET? What mechanisms do communities have to hold them accountable?
RET	Global	Q	It is unclear whether reference to the C-ID throughout this document includes PSQ or not. Please clarify.
RET	11	C	Change: Limit harmful impacts of project and work with impacted communities to identify [AND IMPLEMENT] opportunities to repair past harm.
RET	16	C	The RET commits to an outcome of limiting harmful impacts of project and work with impacted communities to identify opportunities to repair past harm, and yet the Cumulative Effects report barely acknowledges this and it does not appear cumulative effects are even considered as part of the EJ conclusion. Not mentioned in land use, economics, or transportation sub-sections. Some acknowledgment in the Social sub-section. Included in narrative of EJ section, but not included in documentation of analysis that led to an EJ conclusion of no disproportionate high and adverse impact.
RET	39	Q	Has ST met with Chief Seattle and/or Eagle Village residents to discuss the impacts of this potential relocation? If so, what were the outcomes of those conversations? (i.e., if Eagle Village was already planning to relocate independent of this project, this is not really a project impact. On the other hand, if the project is causing them to relocate, that is an entirely different issue. Same questions apply to the newly-leased spaces along Seattle Boulevard where the Salvation Army will be expanding services for houseless community members.

RET	42	Q	Has ST gathered community feedback--particularly from commercial/retail businesses in the C-ID--about the impacts of parking losses, including differences in impacts of on-street vs. off-street parking losses? What was this feedback?
Social Resources, etc	4.3.4.3.3	C	"ST is currently partnering with the community and other agencies on a community-based planning effort for the area to evaluate strategies to maintain and enhance community cohesion" through station design. If station planning is to be considered mitigation for loss of community cohesion, additional information on structuring this "community-based planning effort" will be needed to allow communities to comment on the benefits of the process.
Transportation	Table N1.E-25	Q	If the 4th Avenue deep station is as deep as claimed, and statements in the DEIS indicated that mined stations would have less ground disturbance-- why is the extent of disturbance at the surface so long for 4th Ave deep (CID-1b), especially at 2nd Ave Extension? Why would that segment of roadway be closed for 6.5 years? There do not appear to be any bridges along 4th Avenue north of Main Street-- what is contributing to the extent of roadway disruption north of S. Jackson Street?
Transportation	Table4-53	Q	Key roadway impact #7 for CID-2b, Is the full extent of S. Jackson St. (2nd Ave. Ext. to 5th Ave. S.) partially closed, or just the intersection?
Transportation and Transit		Q	How will alternatives CID-1a and CID-1b affect the 4th Ave. S. bus island just north of S. Jackson St.?
Transportation and Transit		Q	According to the impacted parcel maps and alternative construction descriptions, CID-2a, 2a diagonal impact parcels north of the Goodwill outlet that appear to be part of the KC Metro Central Base. According to the plan sheets, the tunnel portal and ventilation system are located on King County parcels. Construction roadway impacts listed suggest that 6th Ave S adjacent to the Central Base would sustain partial closures for 6-9 months. Based on the information presented in the DEIS, it is unclear what project activity affects each parcel. What are the explicit potential impacts to KC facilities? Is the Goodwill outlet facility impacted for all 5th Avenue Options and Alternative?
Transportation Technical Report	Table 4-53	Q	Why is the Ryerson Bus Based considered permanently closed for this alternative? The tunnel portal appears to be located further south near S. Massachusetts, and the mining appears to begin at the portal-- what is occurring at the surface or on the property that renders the base closed?
Transportation Technical Report	general	Q/C	The analysis did not include stadium events in the traffic or ridership analysis, despite data and statements in the draft indicating that stadium events for three sports teams occur more than 1/3 of the year, and acknowledging that concerts and other large events occur between sports events. Historic South Downtown stakeholders requested Sound Transit explicitly include stadium events in the analysis as a baseline condition. Please explain why this was not considered.
Transportation/ Transit	4.3.17.4.3	C	Construction impacts to the Donnie Chin International Children's Park (7th Ave. S.) and/or the ID/C Community Center and Library (8th Ave. S.) need to be considered if construction diverts bus traffic to either street. 8th Ave. S. may have construction projects during the Project construction timeline, which should be considered, as well as the impacts to senior and family housing, ICHS clinic, and the Denise Louie daycare.
Transportation: Freight Mobility	N.1 9-3	Q	The Transportation Technical Report states that CID-2a would impact truck streets along 6th Ave. S. north and south of Royal Brougham way. Plan sheets and other information in the draft EIS suggest that construction of CID-2a diagonal in this vicinity is approximately the same as CID-2a, and could yield the same effects. Statements made in the transportation technical report state that the diagonal station configuration would not impact truck streets. Is this accurate, and if so, why is CID-2a diagonal different in the vicinity of Royal Brougham, than CID-2a?

APPENDIX C: MATRIX OF SOUTH DOWNTOWN COMMUNITY PRIORITIES AND IMPACTS OF PENDING OPTIONS

Community Priorities	CID 1a (4th Ave. S. shallow)	CID 2a (5th Ave. S., shallow)	CID 2a Diagonal (5th Ave. S., shallow, diagonal configuration)	Environmental Justice and Racial Equity context for Decision-Making
<i>Minimize cumulative harm to and/or displacement of existing businesses, residents, and nonprofits</i>	<p>Longest construction durations of all the options, but it would move the worst of the construction impacts away from most businesses and residential structures. Will disrupt bus service, which could negatively impact businesses, residents and visitors.</p> <p>Construction disruptions would be constant for the years of station and tunnel construction for residents at the Icon Apartments. All units of this complex (up to 120 market rate residential units) would be displaced for a year during 4th Ave. S. bridge rebuilding activity. Building is a mix of long-term rentals and hotel/Air BnB short-term housing. Building will remain standing, so housing will be available after construction.</p> <p>Fewest direct disruptions and relocations to local businesses in CID or Pioneer Square.</p> <p>No loss of on-street parking or loading zones within the CID or Pioneer Square during construction</p>	<p>Biggest loss of local retail/commercial businesses in the CID neighborhood (compared to 1a and 1b).</p> <p>Loss of commercial load zones and on-street parking during station and cut-and-cover tunnel construction (up to 9 years).</p> <p>Would displace Chief Seattle-Eagle Village Pilot (if it hasn't already relocated). Need to clarify how Chief Seattle/Eagle Village residents feel about this (e.g., if they are already planning to relocate independent of the WSBLE project, this isn't much of an impact).</p> <p>Construction disruptions would be constant for the years of station construction for residents at Uwajimaya Village, Fujisada Condominium, Publix Building, and Bush Hotel.</p>	<p>Shortest construction durations of all the options.</p> <p>Same loss of local retail/commercial businesses as 2a, but with additional "temporary" displacements of approximately 9 months.</p> <p>Loss of commercial load zones and on-street parking during station and cut-and-cover tunnel construction (up to 6 years).</p> <p>Would displace Chief Seattle-Eagle Village Pilot (if it hasn't already relocated). Need to clarify how Chief Seattle/Eagle Village residents feel about this (e.g., if they are already planning to relocate independent of the WSBLE project, this isn't much of an impact).</p> <p>Construction disruptions would be constant for the years of station construction for residents at Uwajimaya Village, Fujisada Condominium, Publix Building, and Bush Hotel.</p>	<p>Decisions regarding construction that disrupts the heart of the CID should be made only after familiarizing yourself with past harms and priorities set by the community. This project comes in the wake of numerous other projects, events, and policies that have centered the needs of regional interests rather than the needs of the equity-seeking communities who live and work in the PSQ and CID neighborhoods. While 4th Ave does require collaborative work to reduce negative impacts on buses and other constituencies, it centers the priorities of the people of the CID and PSQ, and shares burdens regionally.</p>
<i>Retain or increase community ownership of properties</i>	<p>Unknown until Sound Transit provides more information about the disposition of the 2.5 acres of urban center property displaced by this part of the project.</p> <p>No displacement of small business serving the local neighborhoods.</p>	<p>Permanent displacement of up to 13 businesses and temporary displacement of up to 8 businesses in 4 buildings. One of those buildings contributes to the local National Register district, and two others would be individually eligible for listing based on preliminary assessments during 106 review.</p>	<p>Permanent displacement of up to 13 businesses and temporary displacement of up to 8 businesses in 4 buildings. One of those buildings to the local National Register district, and two others would be individually eligible for listing based on preliminary assessments during 106 review. Additional impacts to businesses in the American Hotel and the Buty building.</p>	<p>The EIS must surface specific plans to retain or increase community ownership of parcel acquired by Sound Transit after construction is completed. Funding support for local organizations must support staffing for appropriate engagement with the planning processes. Mitigation should continue until the completion of any TOD projects.</p>
<i>Improve public safety</i>	<p>Assuming construction impacts adversely affect public safety, construction duration may be the longest of the five alternatives, but may have less direct impact on C-ID.</p>	<p>Assuming that construction impacts adversely affect public safety, shorter than 1a and 1b but longer than deep alternatives. Because of proximity to heart of C-ID, however, it will have more direct impact (noise, dust, visual impacts, etc.)</p>	<p>Shortest construction duration; however most construction would occur in the heart of CID. Noise, dust, and visual impacts could result in avoidance. Pedestrian detours will need to be provided between CID and existing light rail station; station construction could act like a "barrier" between existing light rail station and CID.</p>	<p>Based on prior work in the CID, lighting and accessible sidewalks are important aspects of community public safety and equitable access to transit. Consideration should be given to the large population of elders living in the CID.</p>
<i>Enhance community vitality and sustainability</i>	<p>Offers the most opportunities for promoting connectivity, mobility, and neighborhood connections in the "Jackson Hub" area of high transit access. Opportunities for activating Union Station first as a passenger terminal and then building on that may also offer additional activation of the surrounding plazas, as well as promotion of cultural and economic vitality of surrounding neighborhoods.</p>	<p>Property acquisition by ST for station construction and staging theoretically creates more opportunity for TOD and affordable housing post-construction than CID-1a and 1b. ST's eTOD policy requires it to "prioritize affordable housing," however, mechanisms for accountability and proof of concept are unclear. The businesses that would be displaced under this option are primarily local small businesses, many owned by POCs. Replacement is not the same as enhancement.</p>	<p>Property acquisition by ST for station construction and staging theoretically creates more opportunity for TOD and affordable housing post-construction than CID-1a and 1b. ST's eTOD policy requires it to "prioritize affordable housing," however, mechanisms for accountability and proof of concept are unclear. The businesses that would be displaced under this option are primarily local small businesses, many owned by POCs. Replacement is not the same as enhancement.</p>	<p>The benefits of eTOD to the CID and PSQ are unclear here. An activated Union Station has the potential to invigorate the transit hub, provide a welcoming entry point to the cultural and business communities in PSQ and CID.</p>
<i>Encourage economic development and increase economic diversity in businesses and residents</i>	<p>4th Ave. alternatives put Union Station directly to use as a transportation hub, by serving as the location for the new light rail station entrance, and a connection between the existing and proposed stations. Using Union Station would be a first step toward activating the building for more public-facing use.</p> <p>There would be no apparent loss of on-street parking or commercial loading zones in the CID district resulting from construction staging activities.</p>	<p>Parcel impacts inside the CID neighborhood would serve as opportunity to redevelop existing parcels and buildings within the project footprint area. TOD opportunities are possible.</p> <p>During construction of the project, full closures of S. Weller and S. King St. between 5th and 6th Avenues would adversely impact small businesses on those blocks. Businesses would have difficulty receiving deliveries. Loss of on-street parking reduces access to residents and small business in the area. Depending on the level of impact to the pedestrian environment, the retail and restaurant storefronts would likely lose foot traffic and customers.</p>	<p>Parcel impacts inside the CID neighborhood would serve as opportunity to redevelop existing parcels and buildings within the project footprint area. TOD opportunities are possible.</p> <p>During construction of the project, full closures of S. Weller and S. King St. between 5th and 6th Avenues would adversely impact small businesses on those blocks. Businesses would have difficulty receiving deliveries. Loss of on-street parking reduces access to residents and small business in the area. Depending on the level of impact to the pedestrian environment, the retail and restaurant storefronts would likely lose foot traffic and customers.</p>	<p>Construction along 5th Ave. S. minimizes traffic issues for the region while expecting them to be born by blocks of businesses in a pedestrian-friendly, small ethnic neighborhood that already bears disproportionate burdens for the regional transportation system. Construction along 4th Ave. S. moves the burden of construction to the region rather than centering it in the CID.</p>

<p><i>Enhance public health and well-being</i></p>	<p>Station construction on 4th Ave. S. would introduce opportunities to enhance and improve the pedestrian environment in the 4th Ave./2nd Ave. Ext./S. Jackson St. area, which benefits PSQ, CID, and transit riders on all modes.</p> <p>Because 1a is cut-and-cover tunnel construction, it would be among the loudest options to construct (88dBa at 50 feet from source--the equivalent of a lawnmower or motorcycle), for durations of 4-6 years.</p> <p>Depending on the extent of 4th Ave. S. reconstruction, surface construction noise could still reach 84-89 dBA for bridge construction activities within 50 feet of a receiver. The Icon apartments would be the closest residents to construction activities.</p> <p>Depending on the state of the viaduct structures beneath 2nd Ave. Ext. S. and S. Jackson St., consolidating those rebuilding efforts could prevent multiple local, major construction projects in the same area.</p> <p>A tunnel ventilation system located in front of Union Station at the corner of 4th Ave. S. and S. Jackson St. would face residents of the Icon Apartments, and</p>	<p>Because 2a is a cut-and-cover tunnel construction, it would be among the loudest of the options (88dBa at 50 feet from source--the equivalent of a lawnmower or motorcycle), for durations of 4-6 years.</p> <p>Additionally, construction on 5th Ave. S. would move noise, dust and other pollution closer to where more people live and work.</p> <p>Construction in the heart of the CID would result in prolonged increase of heavy truck traffic to excavate and build the new station. Large trucks would travel through the small streets at a rate of 10-35 trucks per hour, 5 to 6 days per week, increasing pedestrian and resident exposure to heavy vehicle traffic, truck exhaust, noise, dust, and increased pedestrian/truck conflict at intersections.</p> <p>The new station infrastructure would span across two blocks, and a new tunnel ventilation system and stair egress would be located on the Nagomi Tea House property, which faces residents at the Uwajimaya Village to the south, Fujisada Condominium to the east, and Publix building to the west.</p>	<p>2a diagonal would be a mined station with reduced traffic impacts from CID-2a. This configuration is inconsistently addressed in the DEIS materials, and its impacts are not fully understood.</p> <p>Construction in the heart of the CID would result in prolonged increase of heavy truck traffic to excavate and build the new station. Large trucks would travel through the small St.s at a rate of 10-35 trucks per hour, 5 to 6 days per week, increasing pedestrian and resident exposure to heavy vehicle traffic, truck exhaust, noise, dust, and increased pedestrian/truck conflict at intersections.</p> <p>The new station infrastructure would span across two blocks, and a new tunnel ventilation system and stair egress would be located on the Nagomi Tea House property, which faces residents at the Uwajimaya Village to the south, Fujisada Condominium to the east, and Publix building to the west.</p>	<p>It is unclear if the Downtowner and Hirabayshi Place tenants, residential and commercial, would be affected by 4th Avenue construction. An assessment of noise impacts is necessary for all the options.</p>
<p><i>Acknowledge and address historic racism that has and continues to impact neighborhoods</i></p>				<p>While this community priority is acknowledged in passing in the Environmental Justice section, Appendix A of this letter contains a list of historic racist and governmental actions that have adversely impacted the south downtown neighborhoods.</p>
<p><i>Activate common areas</i></p>	<p>4th Ave. S. Alternatives (CID-1a and 1b) put Union Station directly to use as a transportation hub, by serving as the location for the new light rail station entrance, and a connection between the existing and proposed stations. Using Union Station would be a first step toward activating the building for more public-facing use.</p>	<p>All 5th Ave. S. options create new common areas in the CID (replacing privately held properties) by building a new station entrance, ancillary building spaces, and bicycle storage along 5th and 6th Avenues S.</p>	<p>All 5th Ave. S. options create new common areas in the CID (replacing privately held properties) by building a new station entrance, ancillary building spaces, and bicycle storage along 5th and 6th Avenues S.</p>	<p>Any activation to be done by community organizations must be funded long-term.</p>
<p><i>Improve mobility and connectivity</i></p>	<p>Shallow options mean easier and more convenient transfers between light rail lines, and easier access to other transportation modes (bus routes, streetcar). 4th Ave station plans would provide station access on both the east and west sides of 4th Ave.</p> <p>4th Ave. presents the most difficulties for current bus lines during construction; prioritization of transit maintenance will be important in construction management plans.</p> <p>Provides direct transit connection to both CID and PSQ neighborhoods.</p> <p>More direct connections to bus routes serving Georgetown, and existing access to Sounder and Amtrak</p>	<p>Shallow options mean easier and more convenient transfers between light rail lines, and easier access to other transportation modes (bus routes, streetcar).</p> <p>5th Ave options provide slightly more direct connection to, streetcar, and bus routes serving Beacon Hill, Little Saigon, and Central District, but only one new entryway for the new station. Fifth Ave. S. options also require the rerouting of all Metro electric Trolley busses.</p> <p>Efforts to minimize the footprint of 5th Ave. S. station options is not compatible with the object of the Project resulting in a 100 year vision for the station, its connections, safety and activation.</p>	<p>Shallow options mean easier and more convenient transfers between light rail lines, and easier access to other transportation modes (bus routes, streetcar).</p> <p>5th Ave.options provide slightly more direct connection to, streetcar, and bus routes serving Beacon Hill, Little Saigon, and Central District, but only one new entryway for the new station. Fifth Ave. S. options also require the rerouting of all Metro electric Trolley busses.</p> <p>Efforts to minimize the footprint of 5th Ave. S. station options is not compatible with the object of the Project resulting in a 100 year vision for the station, its connections, safety and activation.</p>	<p>Maintenance of bus routes should be a priority in construction management plans regardless of the alignment chosen.</p> <p>Construction along 4th Ave.should come with the opportunity to explore ways to enhance pedestrian infrastructure.</p>
<p><i>Retain historic and cultural character</i></p>	<p>Approximately 20-foot tall tunnel vent placed in front of Union Station, which will have visual impacts and conflicts with Pioneer Square Preservation Board regulations.</p>	<p>Demolition of 418 5th Ave. S. (which houses multiple small businesses), Nagomi Plaza (519 6th Ave.S), and 525 S. Jackson Street (Seattle 1st National Bank-International District Branch), which are considered historic buildings.</p>	<p>Demolition of 418 5th Ave. S. (which houses multiple small businesses), Nagomi Plaza (519 6th Ave.S), and 525 S. Jackson Street (Seattle 1st National Bank-International District Branch), which are considered historic buildings. Additional impacts for this alignment include temporary closures of both the historic American Hotel and the history Buty Building for</p>	<p>A review of historic district regulations should be done to see how Union Station reuse plans and ventilation needs for the tunnel can be planned to minimize adverse effects to the historic building.</p>

<p><i>Support a small business environment</i></p>	<p>All options provide new underground connections between light rail stations, which could potentially reduce pedestrian traffic to small business in the vicinity of the stations.</p> <p>Reinvigoration of Union Station as a passenger terminal building creates feasible, sustainable options for integration of promotion of neighborhood businesses. For example, a local coffee shop could staff a coffee cart, or the Wing Luke and Klondike National Park could share a kiosk to promote their museums, offer tours.</p> <p>All stations would result in a small conversion of parking along 5th Ave. S, to passenger load for transit.</p> <p>4th Ave. S. Alternative and Option would not result in any additional on-street parking loss during construction or operations.</p> <p>This option would impact approximately 200 parking spaces of the 1,086 stall Union Station Parking Garage.</p>	<p>All options provide new underground connections between light rail stations, which could reduce pedestrian traffic to small business in the vicinity of the stations.</p> <p>Reuse of Union Station would be harder absent an authentic need for people to walk in and out of the building. The City of Seattle, the Community and other stakeholders have - quite literally - been studying ways to reuse Union Station as a community amenity for 50 YEARS without success. It is clear that successful reuse of the building would require a great deal of expense in terms of consulting and long term operational support.</p> <p>All stations would result in a small conversion of parking along 5th Ave. S, to passenger load for transit.</p> <p>CID-2a would result in a temporary loss of on-street parking within the CID neighborhood, which is known to reduce traffic to small businesses. The complete closure of S. King St. and S. Weller St. would have direct impacts on small businesses that would not be actually displaced by construction.</p> <p>This option would impact all surface lot parking at the 6th and King parking lot, and the Bank of America parking lot on 6th Avenue. Surface level and on-street parking is important to residents and small</p>	<p>All options provide new underground connections between light rail stations, which could reduce pedestrian traffic to small business in the vicinity of the stations.</p> <p>Reuse of Union Station would be harder absent an authentic need for people to walk in and out of the building. The City of Seattle, the Community and other stakeholders have - quite literally - been studying ways to reuse Union Station as a community amenity for 50 YEARS without success. It is clear that successful reuse of the building would require a great deal of expense in terms of consulting and long term operational support.</p> <p>All stations would result in a small conversion of parking along 5th Ave. S, to passenger load for transit.</p> <p>CID-2a would result in a temporary loss of on-street parking within the CID neighborhood, which is known to reduce traffic to small businesses. The complete closure of S. King St. and S. Weller St. would have direct impacts on small businesses that would not be actually displaced by construction.</p> <p>This option would impact all surface lot parking at the 6th and King parking lot, and the Bank of America parking lot on 6th Avenue. Surface level and on-street parking is important to residents and small</p>	<p>Construction will affect the business environment, but much less so if aligned to 4th Ave. S. than to 5th Ave. S. Indirect impacts can be addressed through support and information, while construction cutting off pedestrian access or "temporary" 9 month business closures will adversely affect the local business district.</p>
<p><i>Ensure that people across Seattle and the region continue to visit the neighborhoods, even during construction</i></p>	<p>Longer construction durations than 5th Avenue alternatives.</p> <p>No direct interruption of access from existing light rail to CID neighborhood during construction. Increased "barrier" of construction between CID and Pioneer Square neighborhoods. Pedestrian detours to get around construction may increase the walking distance and result in avoidance. Transit users may choose other stations to disembark to access Pioneer Square or Waterfront during construction.</p>	<p>Temporary but high impact (noise, dust vibration) construction effects on Hing Hay Park (construction will be across the street); temporary impacts to Uwajimaya Village, including loading dock, parking garage, and entrance plaza.</p> <p>Pedestrian detours needed from existing light rail station to CID would be long, and could potentially create a barrier to visiting CID during construction.</p>	<p>Temporary but high impact (noise, dust vibration) construction effects on Hing Hay Park (construction will be across the street) and neighborhood residents directly adjacent to station construction.</p> <p>Pedestrian detours needed from existing light rail station to CID would be long, and could potentially create a barrier to visiting CID during construction.</p>	<p>The CID and PSQ experienced disproportionate impacts from the COVID-19 pandemic, and extensive on-going public projects that preceded the pandemic. Temporary mitigation during construction would need to include signage, promotion, and other necessary support for small businesses.</p>

Ballard Link Extension

Denny Station status report

Board of Directors

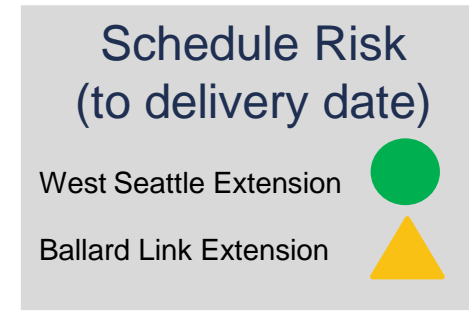
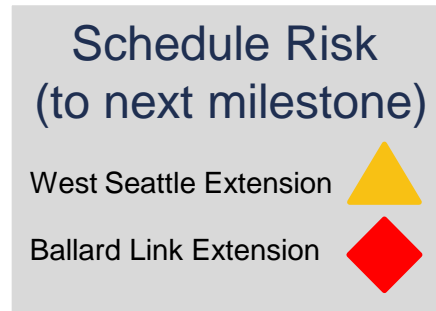
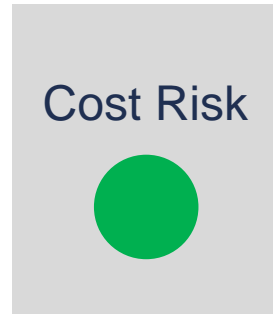
7/27/23



Why we're here today

- Brief recap of May status report to Board on Denny Station
- Overview of assessment of ridership, access, equity and large events
- Overview of community feedback
- Potential board action to modify preferred alternative in Denny station area

Cost and schedule risks



Cost Risks

- Additional cost elements of preferred alternative dependent on third party funding.
- Potential for additional costs associated with permitting requirements.
- Potential impacts from higher real estate and construction costs.
- Potential that design or construction challenges could emerge as work progresses.

Schedule Risks

- Potential additional environmental process delays.
- Potential permitting challenges and other necessary coordination/approvals associated with water crossing.
- Potential schedule risks associated with real estate acquisition process.
- Potential risk in processing reviews/approvals with permitting authorities in a timely manner.

Environmental process next steps

- West Seattle and Ballard Link Extensions Draft EIS was published in January 2022
- Both extensions were initially on the same environmental review timeline
- Additional environmental review needed for project refinements for Ballard Link Extension resulting from Board action in March 2023
- Environmental review for the two extensions will now proceed on different timelines
 - West Seattle Link Extension will proceed to a Final EIS
 - Ballard Link Extension will require a SEPA Supplemental Draft EIS/NEPA Draft EIS
(incorporating all work to date including previous comments, public outreach and environmental analysis)

***Recap of May
status report***



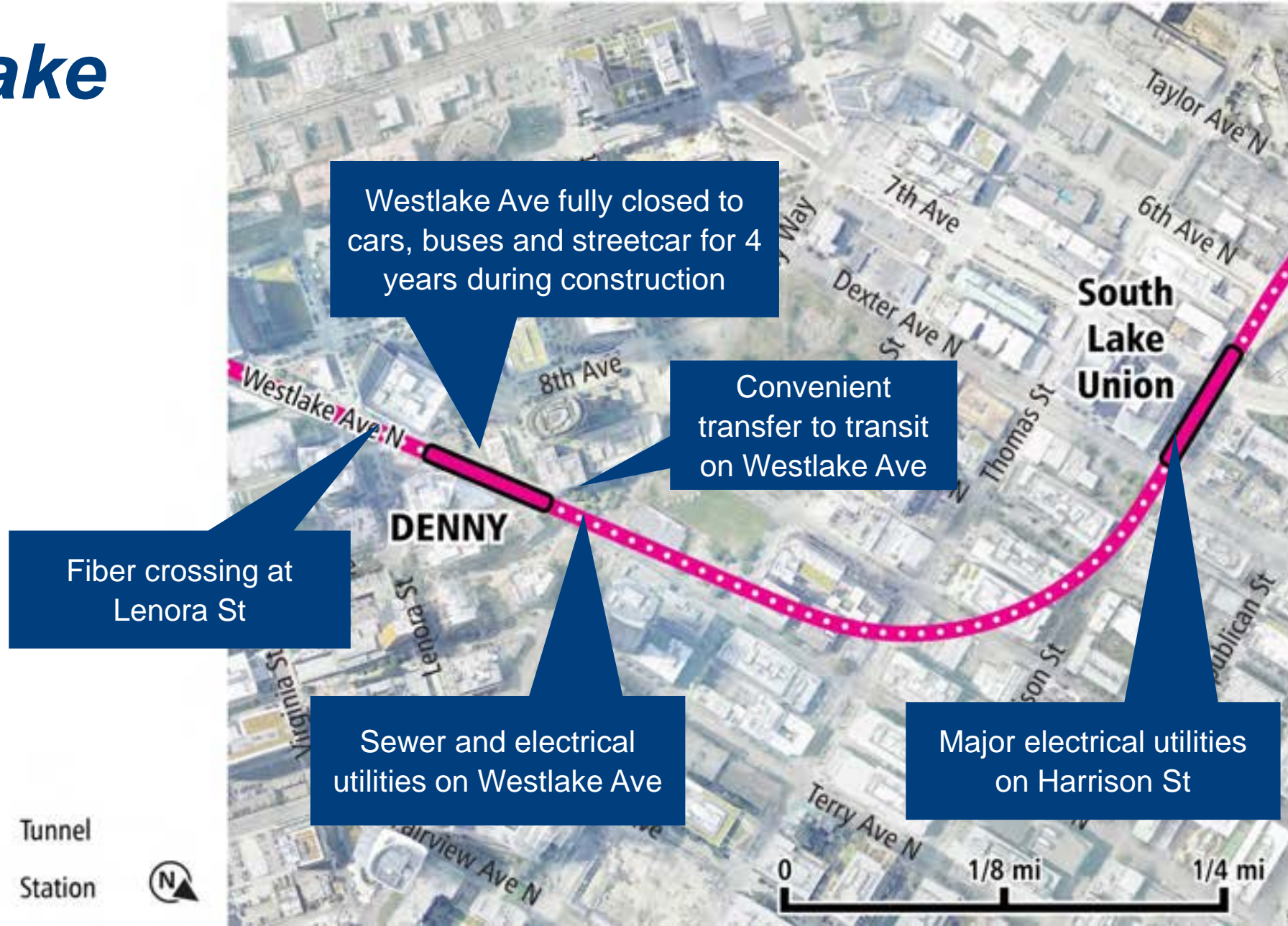
March Board action

Motion No. M2023-18

While the previously-identified preferred alternative is not modified at this time, staff is directed to **carry forward both the Denny Station on Westlake** (DT1) Draft EIS Station alternative **and Denny Station on Terry** (i.e. South Lake Union Mix and Match) alternative as part of ongoing environmental review. Staff is directed to continue collaboration with City of Seattle and community partners to **further clarify the technical, financial, schedule and risk implications of both alternatives** and return to the Board with a **status report by May 25, 2023.**

Denny Westlake

Draft EIS DT-1



Denny Terry SLU Mix-Match

\$340m additional cost

Uncertainty of fiber relocation could delay overall schedule

Substantial disruption and litigation risk if inadvertently cut fiber lines

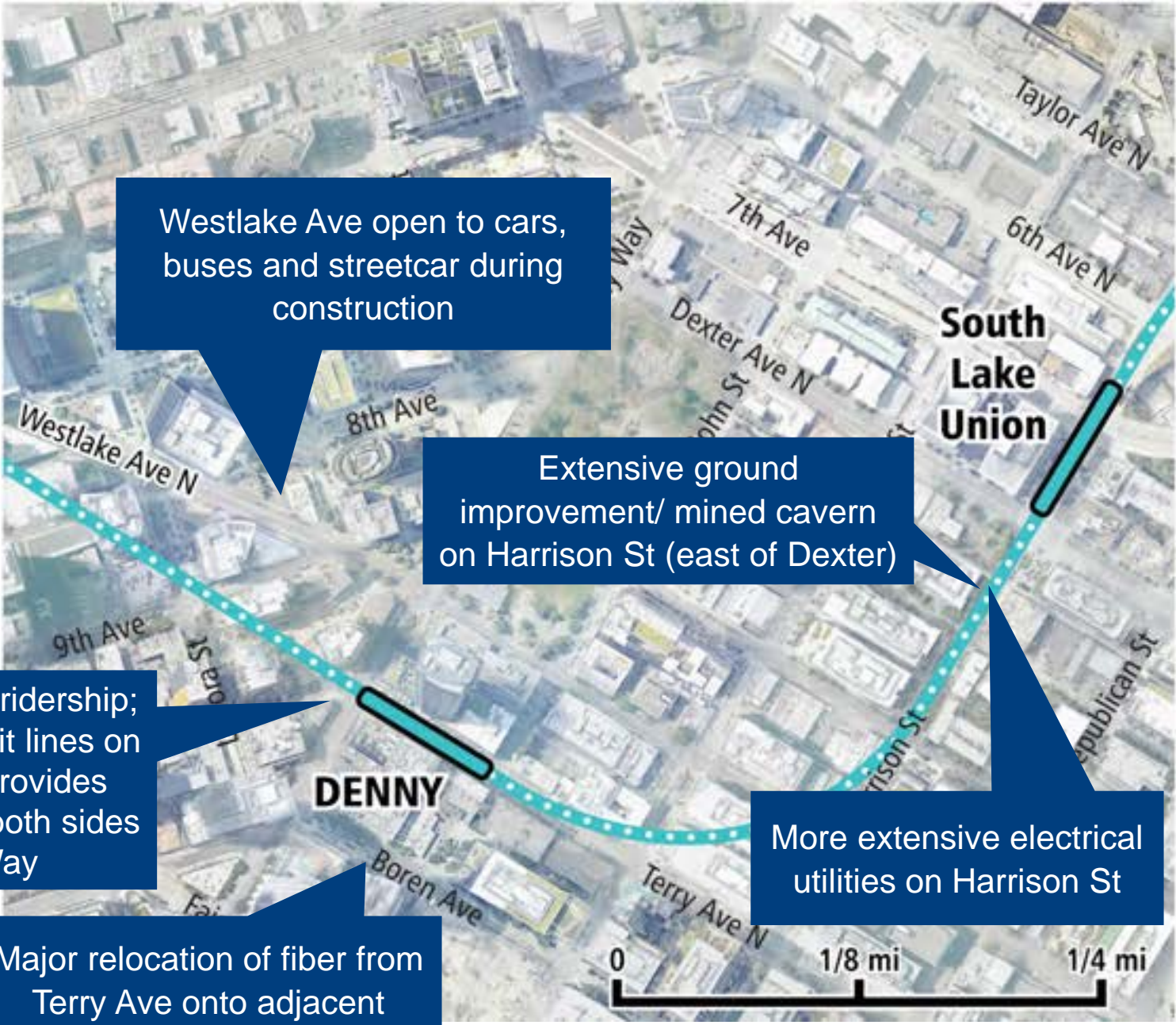
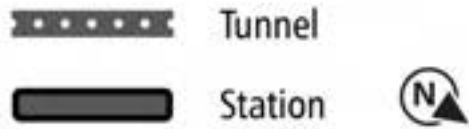
Minimal impact to ridership; short walk to transit lines on Westlake Ave; provides station access to both sides of Denny Way

Major relocation of fiber from Terry Ave onto adjacent streets (Boren, Denny)

Westlake Ave open to cars, buses and streetcar during construction

Extensive ground improvement/ mined cavern on Harrison St (east of Dexter)

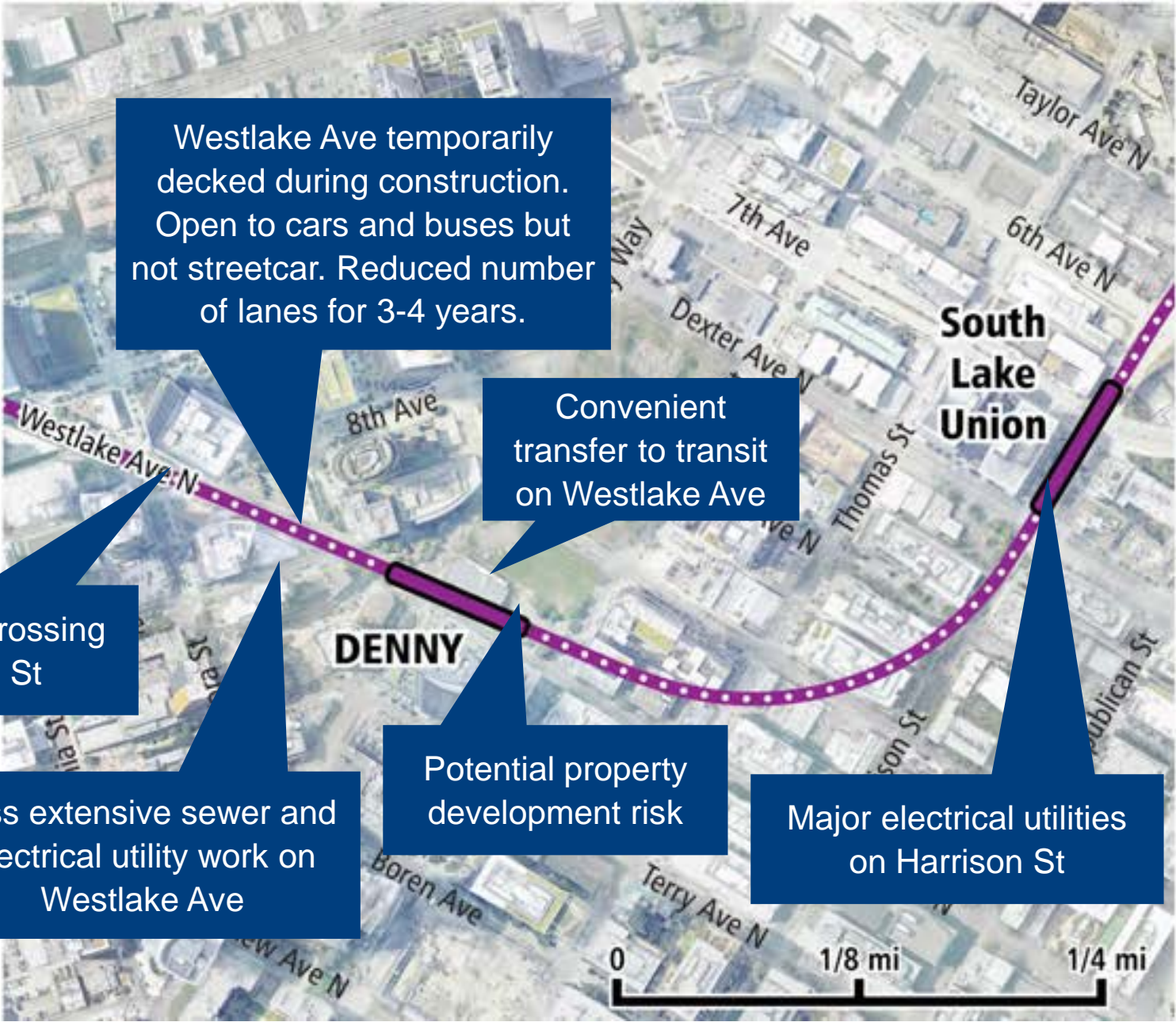
More extensive electrical utilities on Harrison St



Denny Westlake Shifted North

\$170m additional cost*

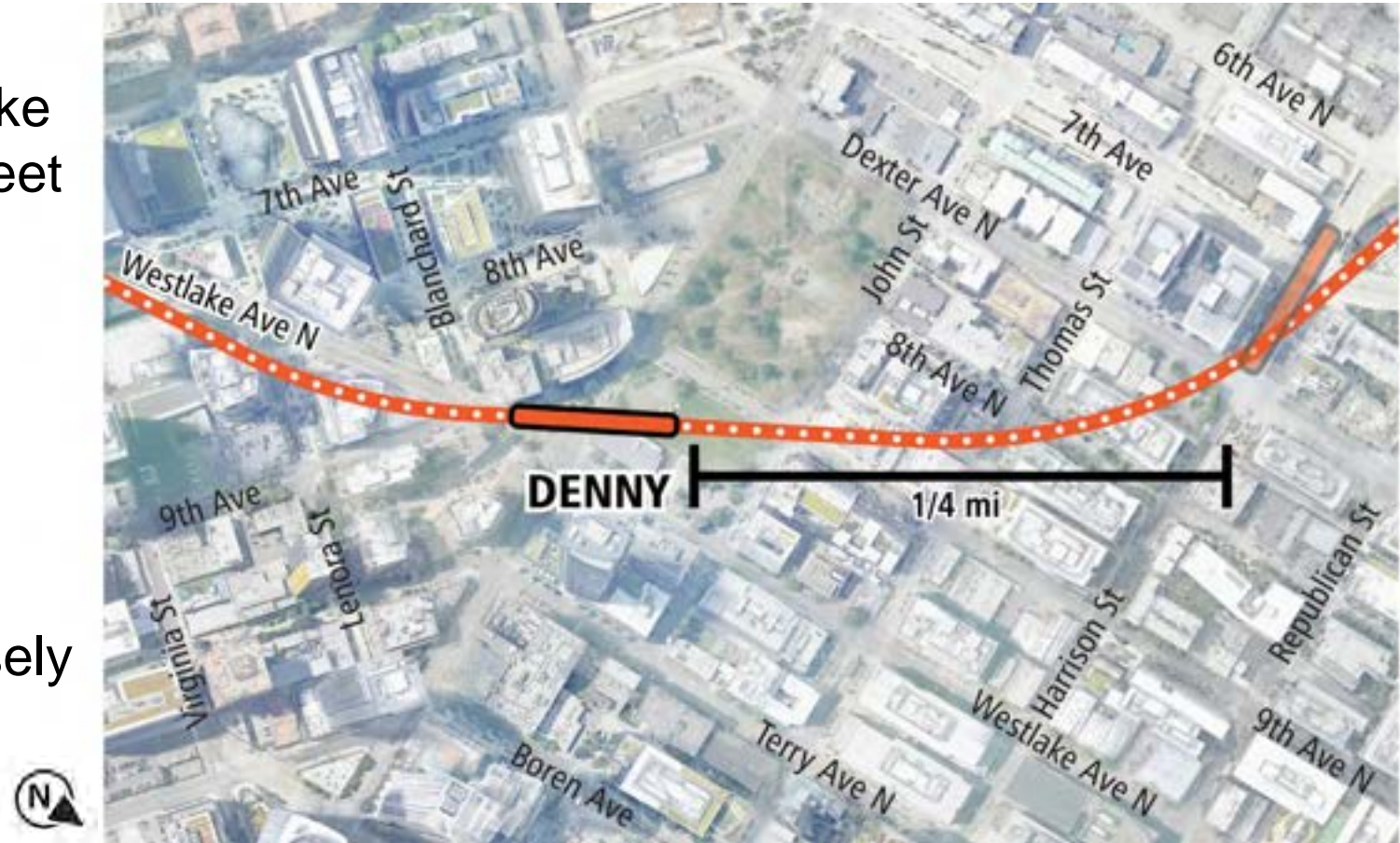
Phased in-street construction to maintain traffic adds construction complexity and extends duration of street effects (8 years vs 4 years)



Denny Westlake

Shifted West

- To further avoid impacts to Westlake Ave, shifted station west out of street right of way onto private property
- Resulted in very close spacing to Harrison St station with geometric and technical constraints
- Hence, considered consolidated station concept instead of two closely spaced stations



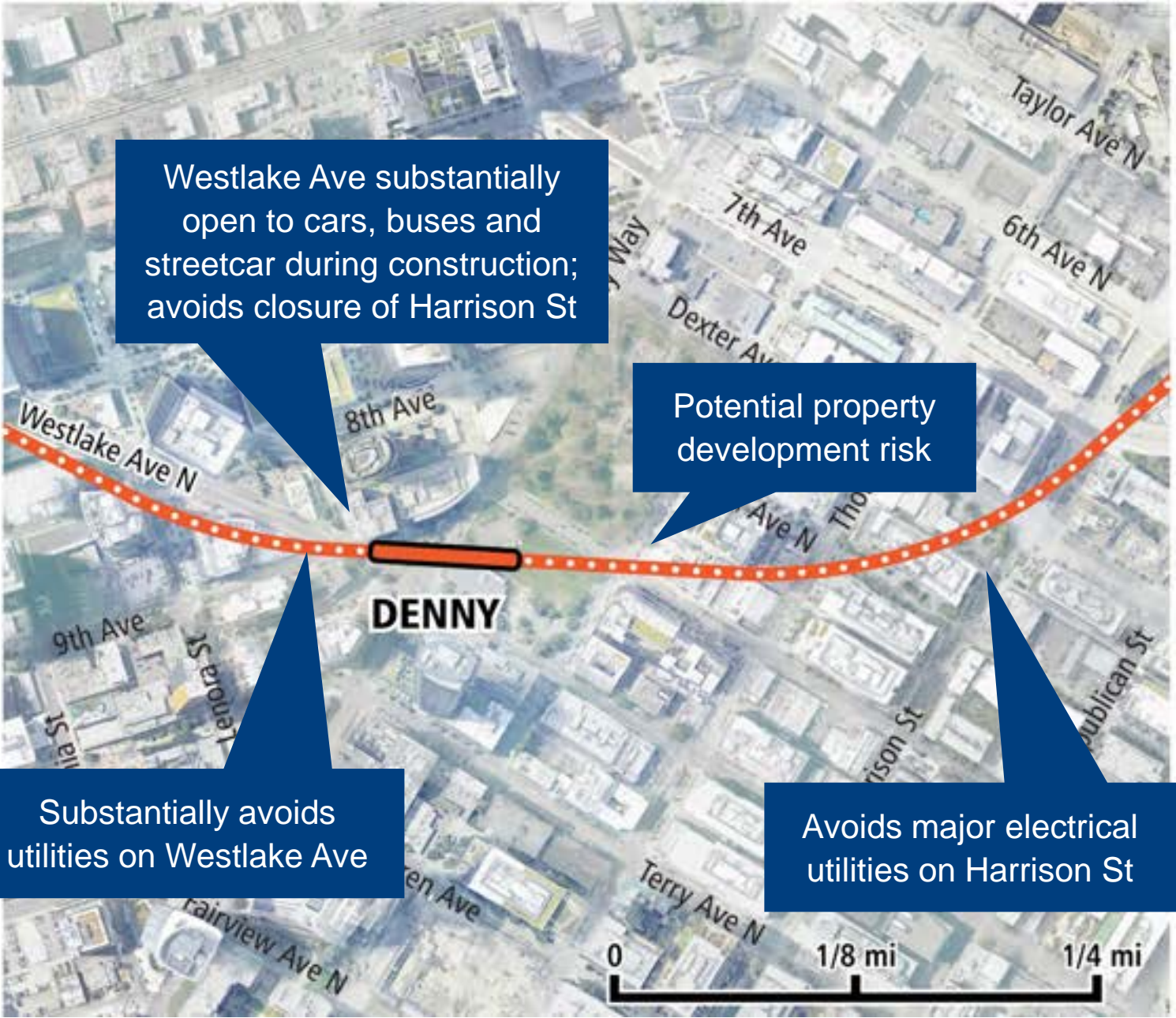
Denny Westlake

Shifted West

\$440m cost savings due to consolidation of Denny and Harrison St stations*

Potentially shorter station construction duration due to improved site access and mostly off-street construction

Ridership, transit integration and passenger experience implications of consolidated station to be further assessed





Denny Westlake

Denny Terry

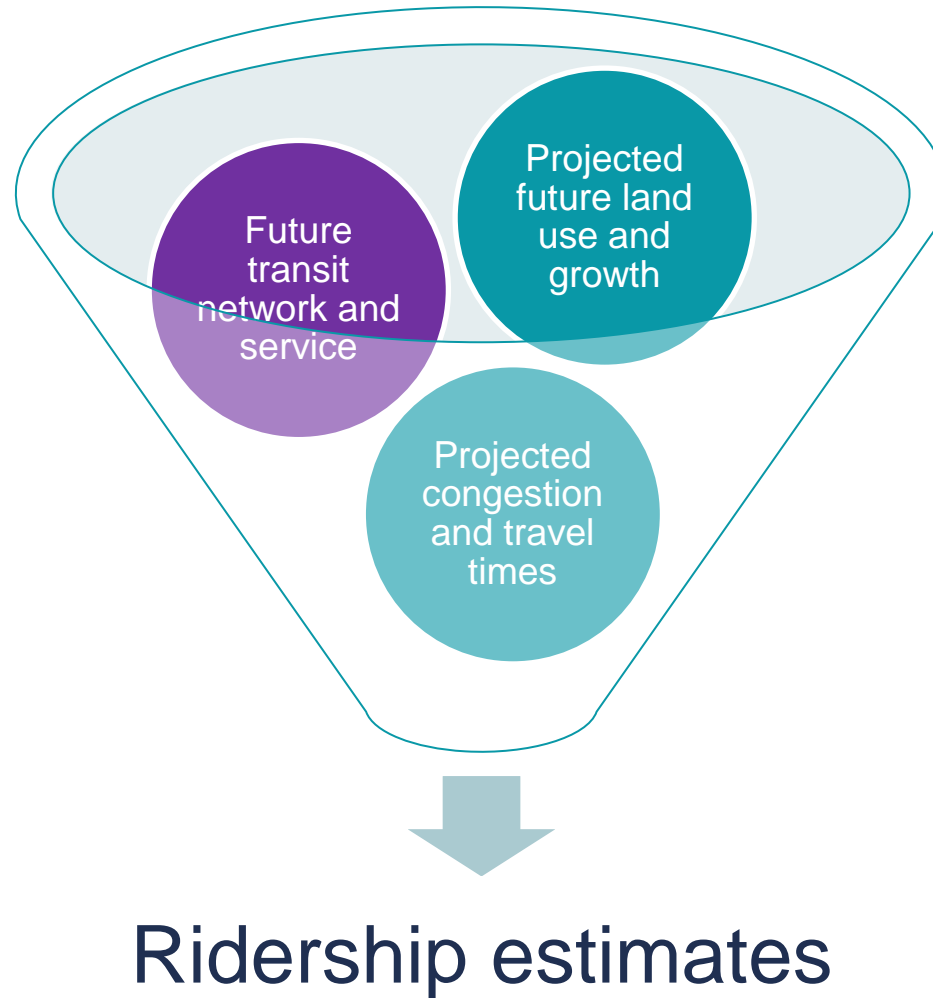
Denny Westlake refinement options

	Draft EIS (DT-1)	SLU Mix-Match	Shifted North	Shifted West
Technical <i>street closures</i>	Westlake Ave fully closed to cars, buses and streetcar for 4 years during construction	Westlake Ave open to cars, buses and streetcar during construction	Westlake Ave temporarily decked during construction. Open to cars and buses but not streetcar. Reduced number of lanes for 3-4 years.	Westlake Ave substantially open to cars, buses and streetcar during construction; avoids closure of Harrison St
<i>utilities</i>	Sewer and electrical utilities on Westlake Ave; fiber crossing at Lenora St; major electrical utilities on Harrison St	Major relocation of fiber from Terry Ave onto adjacent streets (Boren, Denny); more extensive electrical utilities on Harrison St	Less extensive sewer and electrical utility work on Westlake Ave; avoids fiber crossing at Lenora St; major electrical utilities on Harrison St	Substantially avoids utilities on Westlake Ave and completely avoids major electrical utilities on Harrison St
<i>constructability</i>	Base case for constructability comparison	Extensive ground improvement/mined cavern on Harrison St (east of Dexter)	Phased in-street construction to maintain traffic adds construction complexity and extends duration of street effects (8 years vs 4 years)	Potentially shorter station construction duration due to improved site access and mostly off-street construction
Performance <i>ridership, transit integration, passenger experience</i>	Convenient transfer to transit on Westlake Ave	Minimal impact to ridership; short walk to transit lines on Westlake Ave; provides station access to both sides of Denny Way	Convenient transfer to transit on Westlake Ave	<i>To be assessed</i>
Cost <i>compared to Denny Westlake Draft EIS DT-1</i>	Base case for cost comparison	\$340m additional cost	\$170m additional cost*	\$440m cost savings due to consolidation of Denny and Harrison St stations*
Schedule <i>overall project delay</i>	Base case for schedule comparison	Uncertainty of fiber relocation could delay overall schedule	No delay to overall schedule	No delay to overall schedule
Risk <i>substantial cost, schedule, or feasibility risks</i>	Base case for risk comparison	Substantial disruption and litigation risk if inadvertently cut fiber lines	Potential property development risk	Potential property development risk; avoids major electrical utilities on Harrison St

***Results for ridership, access,
equity, and large events***

Ridership Modelling

Key model inputs:



Transit Integration: Draft EIS

- 80% of all bus-rail transfers at SLU are related to four routes:
 - 1001 (E Line)
 - 1005 (similar to Route 5) Downtown-Fremont-Greenwood
 - 1202 (similar to Route 62) Downtown-Wallingford-Sand Pt
 - 1061 (similar to Route 8/11) Interbay-Capitol Hill-Madison Park
- Bus-rail transfers are about 32% of total boardings at South Lake Union Station; 12% at Denny Station

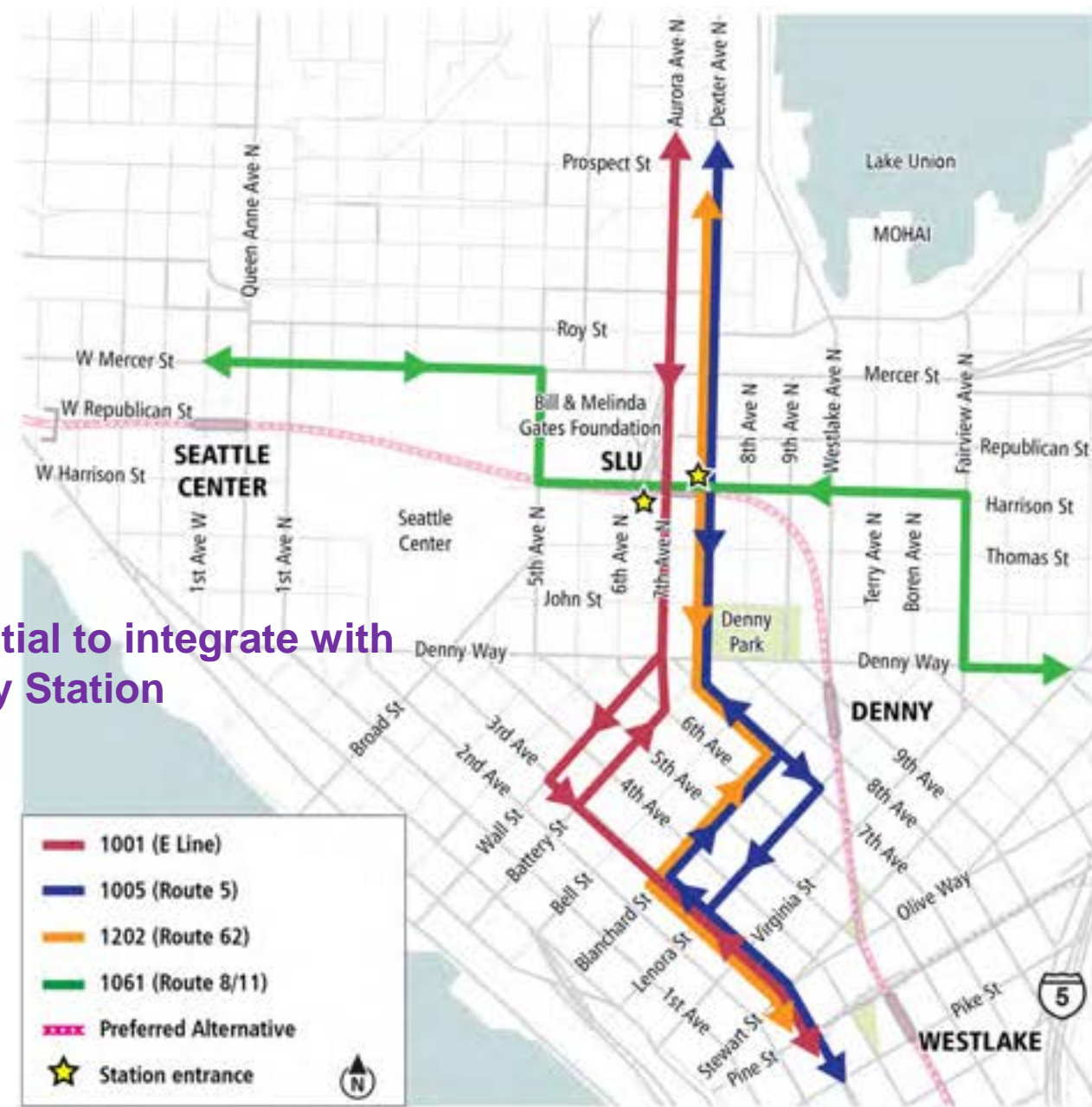


Transit Integration: Draft EIS

- 80% of all bus-rail transfers at SLU are related to four routes:
 - 1001 (E Line)
 - 1005 (similar to Route 5) Downtown-Fremont-Greenwood
 - 1202 (similar to Route 62) Downtown-Wallingford-Sand Pt
 - 1061 (similar to Route 8/11) Interbay-Capitol Hill-Madison Park*
- Bus-rail transfers are about 32% of total boardings at South Lake Union Station; 12% at Denny Station

*Would require dedicated bus lanes on Denny Way and improvements to adjacent network roads. Feasibility of dedicated bus lanes on Denny is highly uncertain at this time

Potential to integrate with Denny Station

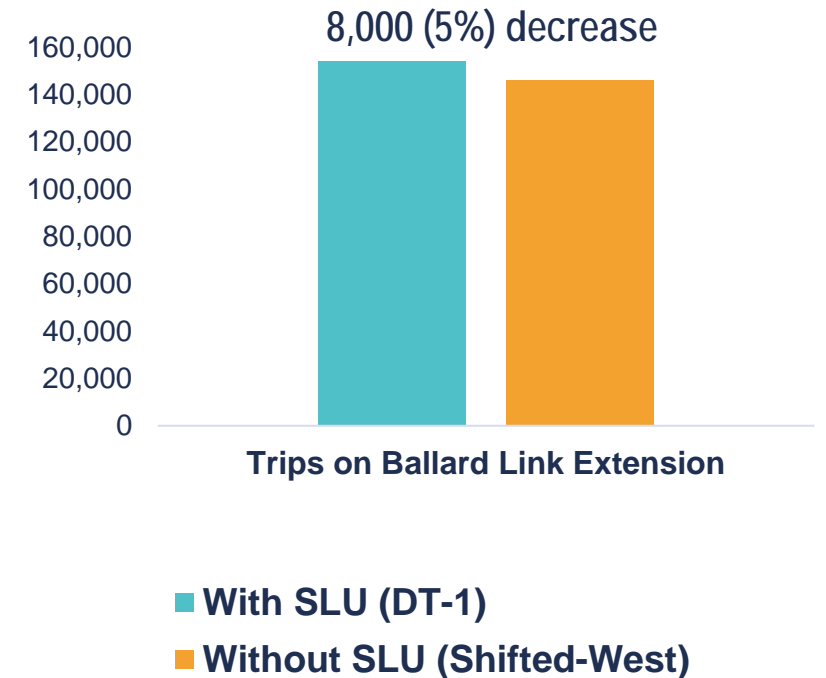


Ridership modeling results

What would happen if the Denny and SLU stations were consolidated...

Overall transit ridership would remain steady¹ but fewer people would choose to ride Link. Riders would instead choose to ride the bus or would stay on the bus and not transfer to Link.

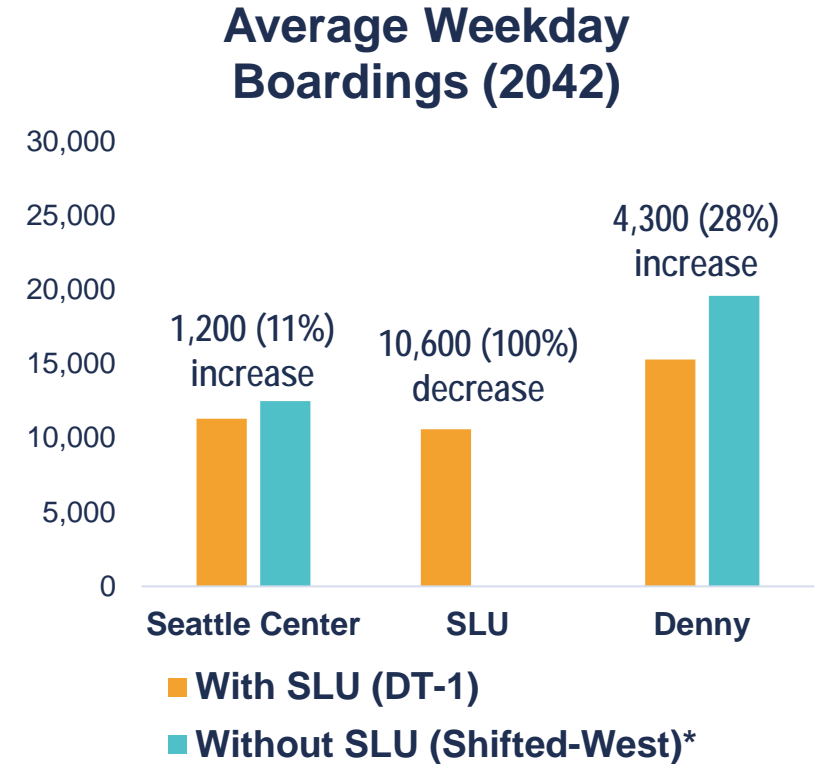
Average Weekday (2042)



Ridership modeling results

How do travel patterns shift in SLU area...

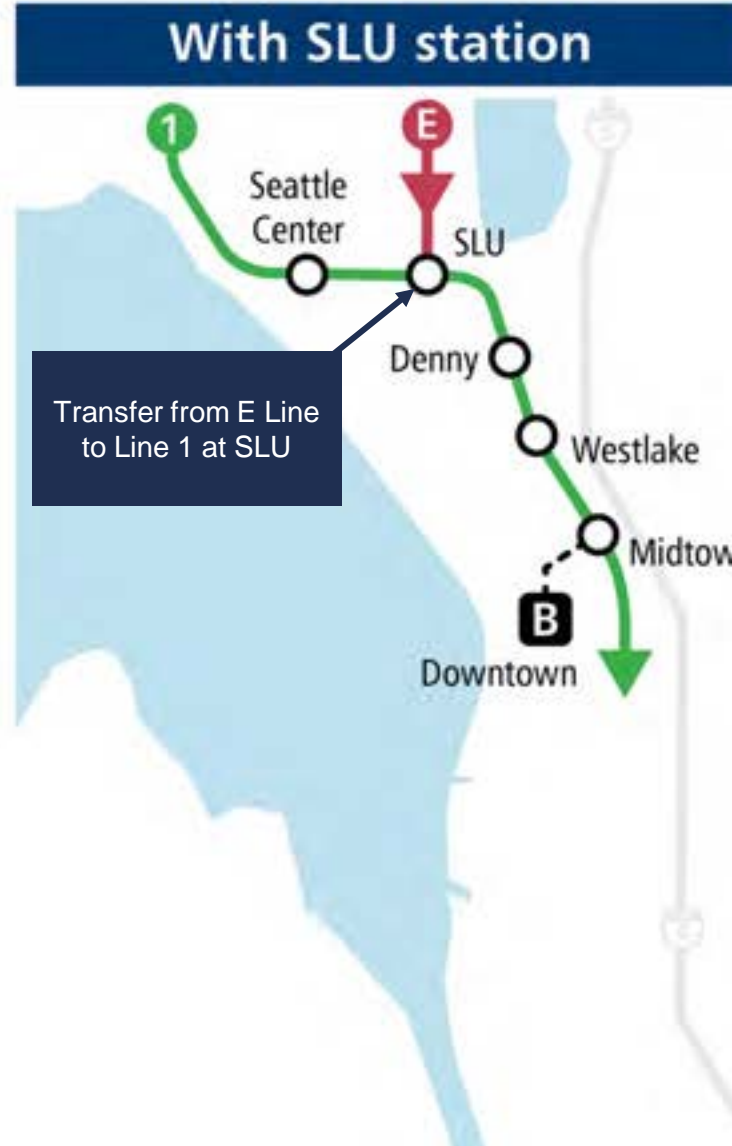
Approximately half of projected boardings expected at SLU Station shift to Seattle Center and Denny Stations in Shifted West Scenario. Remaining boardings mostly shift to bus. Overall boardings on Link drop by ~10k.



Ridership modeling results

How trips could change...

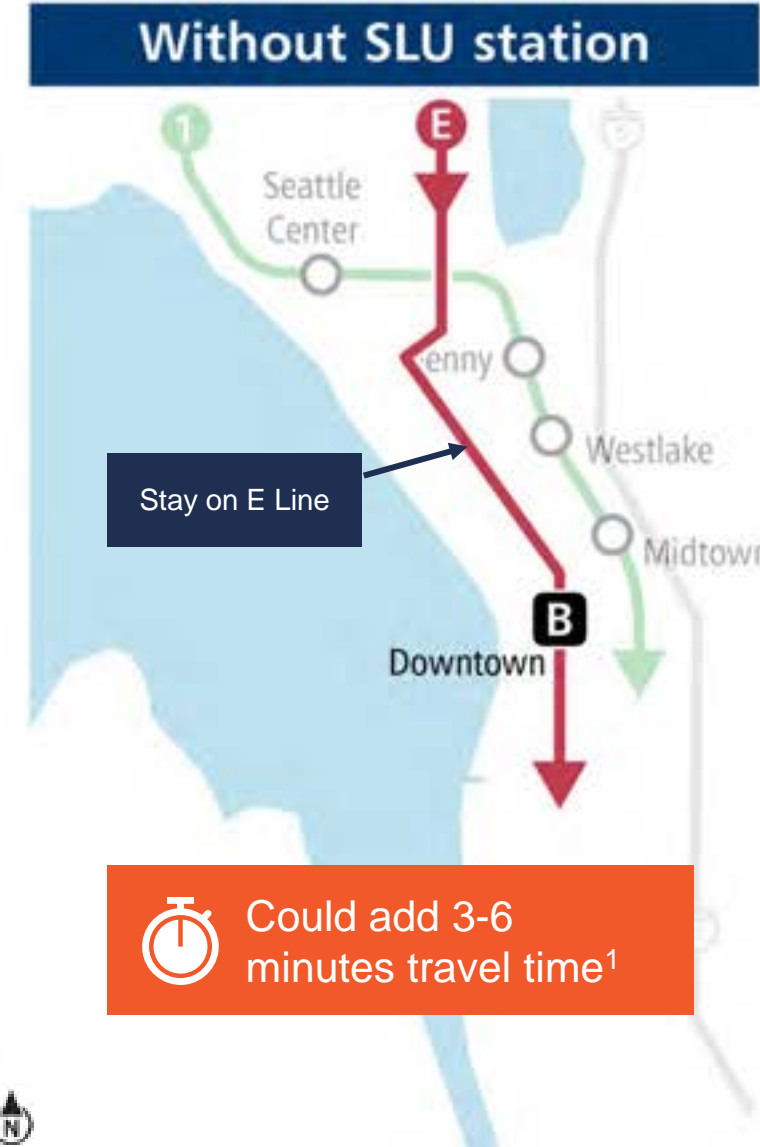
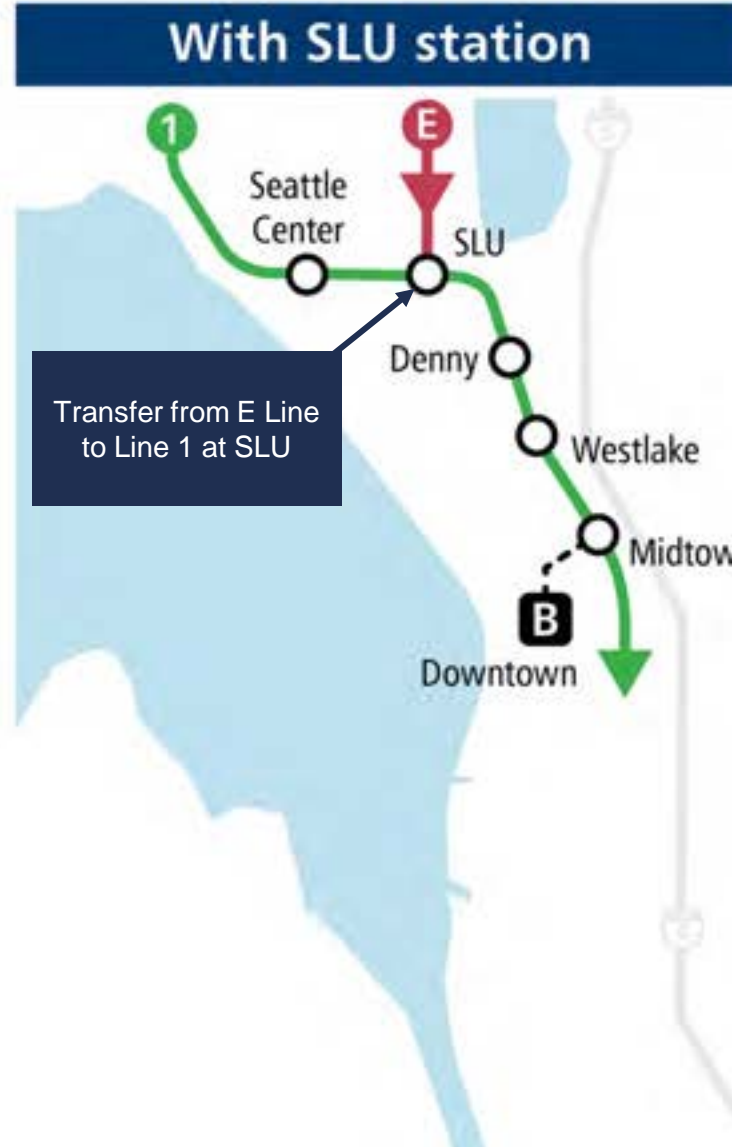
Someone who rides the E Line from the north into downtown might have transferred to Link at SLU for the remainder of their trip but instead chooses to stay on the bus to access their destination



Ridership modeling results

How trips could change...

Someone who rides the E Line from the north into downtown might have transferred to Link at SLU for the remainder of their trip but instead chooses to stay on the bus to access their destination



Ridership modeling results

How trips could change...

Someone at Dexter and Mercer who might have chosen Link to get to Westlake Center via a 3-minute walk to the SLU station instead chooses to ride the 62 bus

With SLU station



Without SLU station



Ridership modeling results

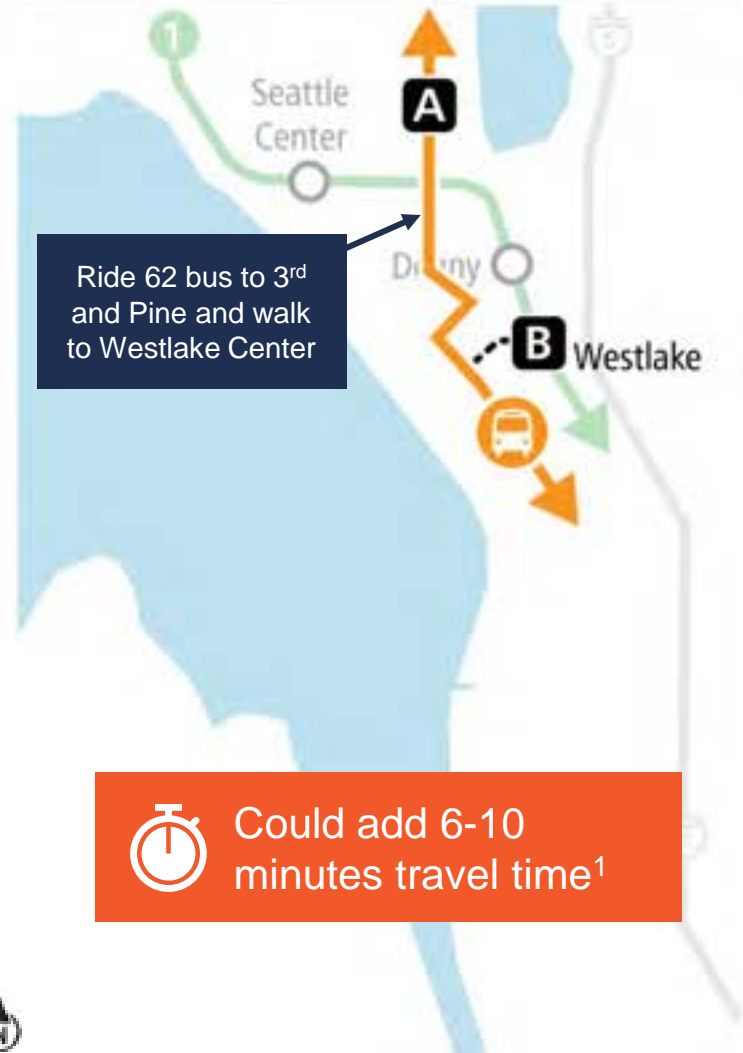
How trips could change...

Someone at Dexter and Mercer who might have chosen Link to get to Westlake Center via a 3-minute walk to the SLU station instead chooses to ride the 62 bus

With SLU station



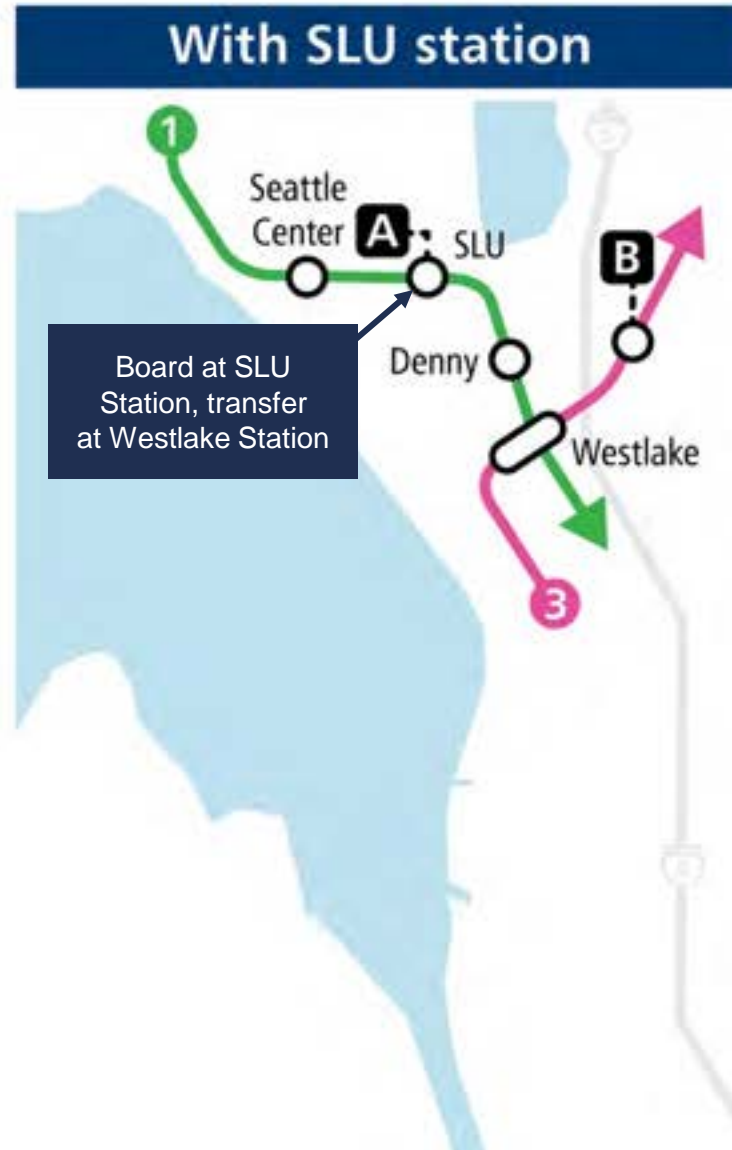
Without SLU station



Ridership modelling results

How trips could change...

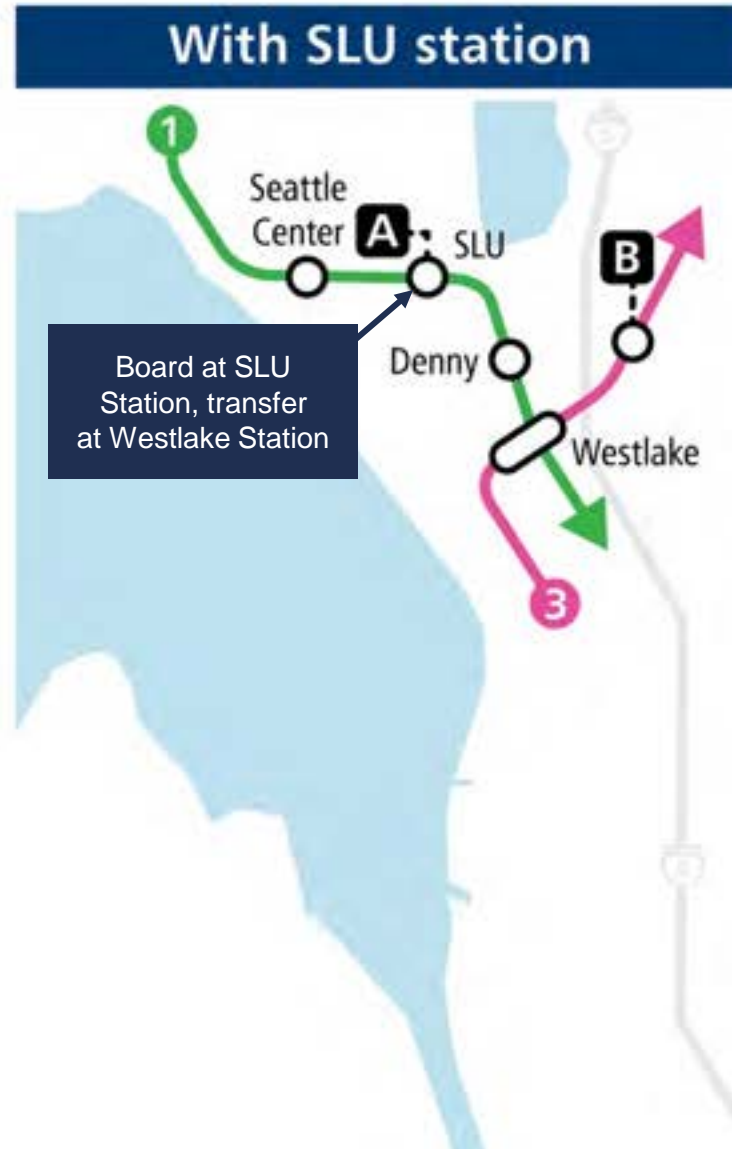
Someone at Dexter and Harrison going to Capitol Hill might have boarded Link at SLU station would instead ride METRO CONNECTS Route 3028/3104 to Capitol Hill



Ridership modelling results

How trips could change...

Someone at Dexter and Harrison going to Capitol Hill might have boarded Link at SLU station would instead ride METRO CONNECTS Route 3028/3104 to Capitol Hill



Walk access

10-minute Walksheds* With SLU



10-minute Walksheds* Without SLU



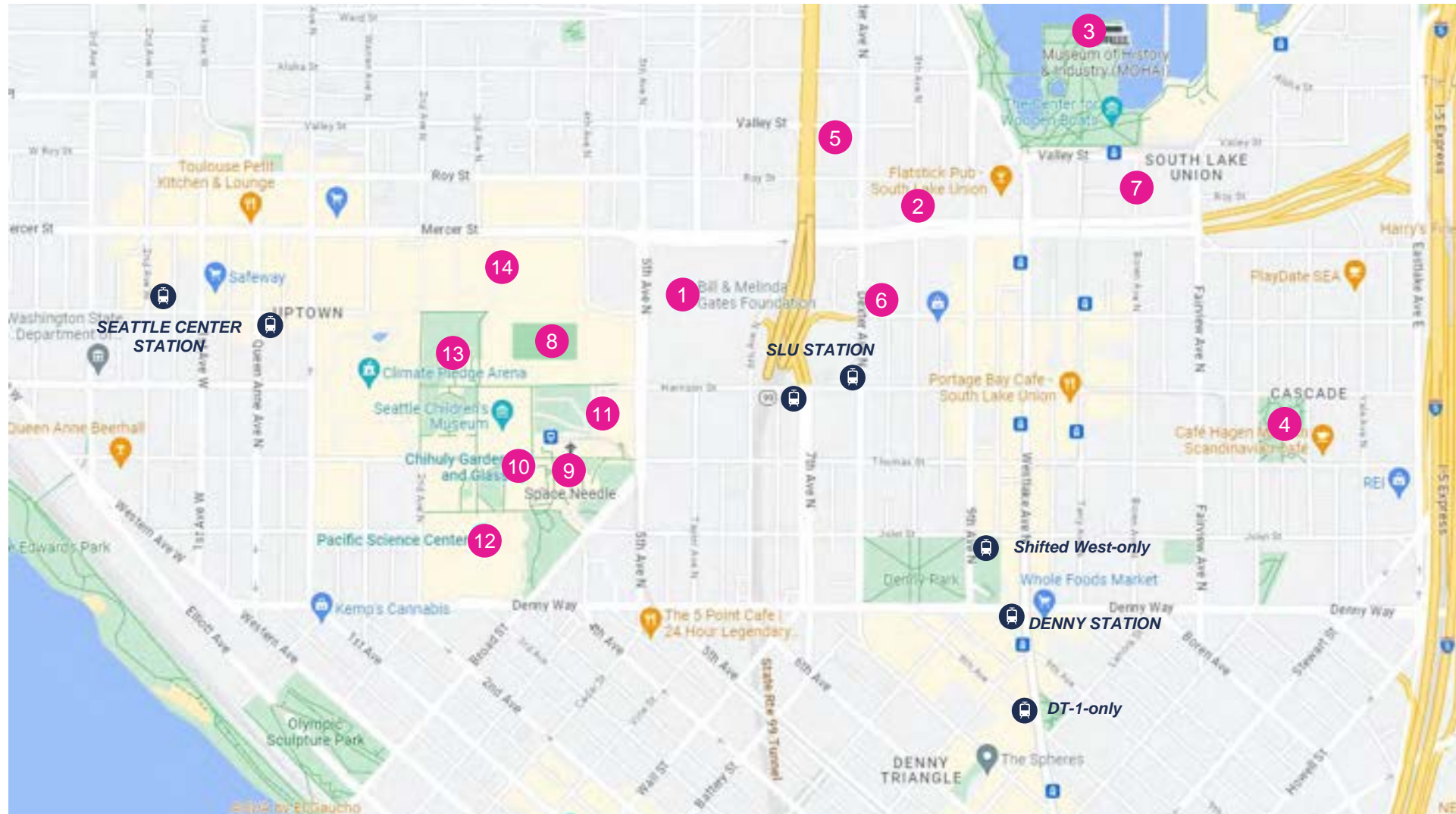
5+ min difference

Walk time to nearest 1-Line station*:

	With SLU	Without SLU	Notes
1 Gates Foundation	2 min	10 min	Walk to Denny (shifted west) instead of SLU. Would introduce additional arterial crossings for Gates Foundation (7th Ave and Dexter Ave) and Mary's Place (Dexter Ave).
2 Mercer Mega Block	6 min	12 min	
3 MOHAI	14 min	15 min	
4 Cascade Playground	10 min	10 min	
5 Mary's Place	7 min	12 min	
6 UW Medicine Primary Care	2 min	8 min	
7 Google	12 min	12 min	
8 Memorial Stadium	6 min	6 min	Walk to Seattle Center rather than either Seattle Center or SLU
9 Space Needle	7 min	10 min	Walk to Seattle Center rather than SLU. Walking to Seattle Center station would involve fewer arterial crossings.
10 Chihuly Gardens & Glass	8 min	10 min	
11 MoPop	4 min	10 min	Walk to Seattle Center in both scenarios
12 Pacific Science Center	10 min	10 min	
13 International Fountain	6 min	6 min	
14 McCaw Hall	6 min	6 min	

*Walk times are approximate based on an example walking route and do not account for all passengers' preferences

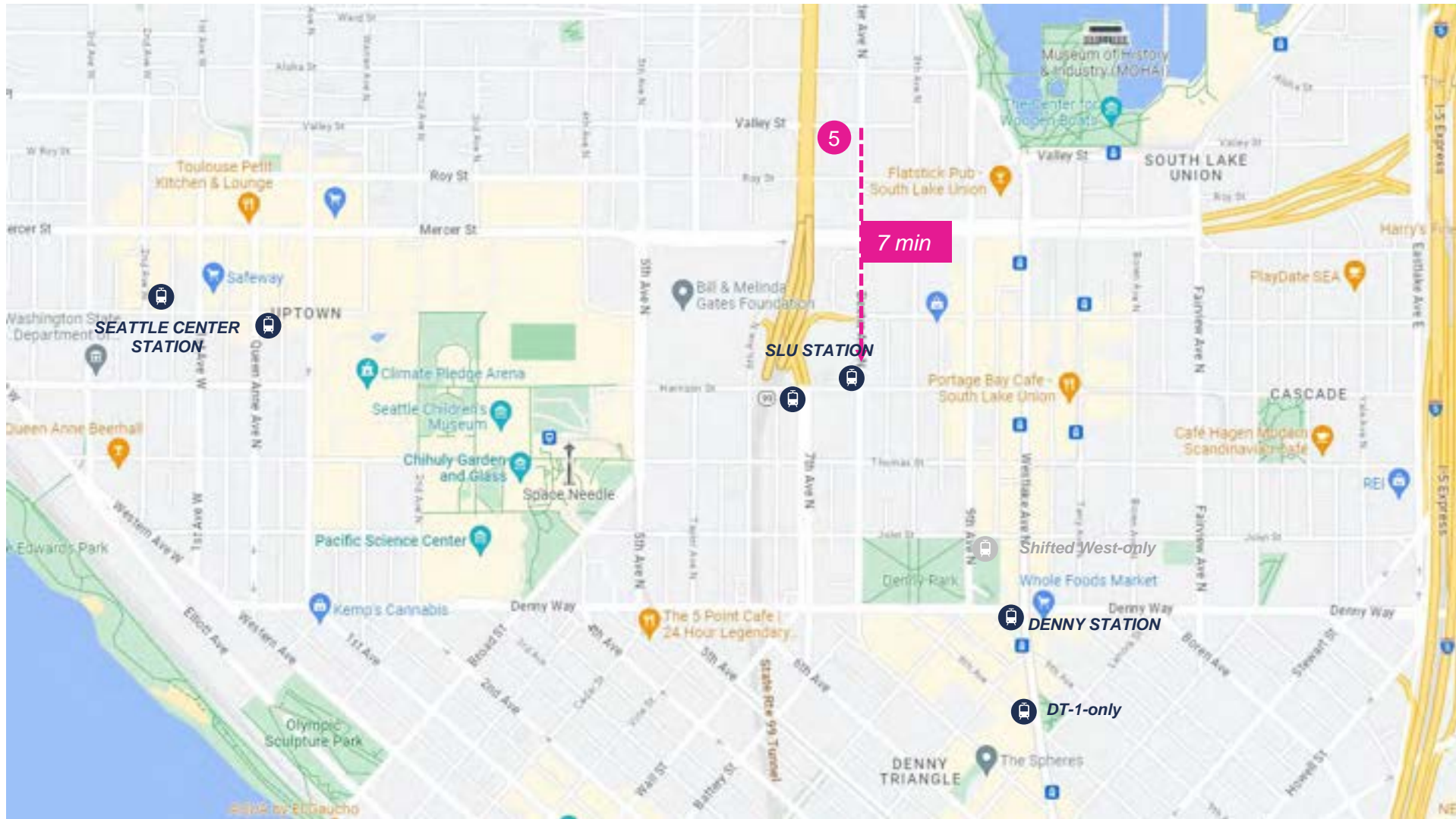
Walk Access*



- 1 Gates Foundation
- 2 Mercer Mega Block
- 3 MOHAI
- 4 Cascade Playground
- 5 Mary's Place
- 6 UW Medicine Primary Care
- 7 Google
- 8 Memorial Stadium
- 9 Space Needle
- 10 Chihuly Gardens & Glass
- 11 MoPop
- 12 Pacific Science Center
- 13 International Fountain
- 14 McCaw Hall

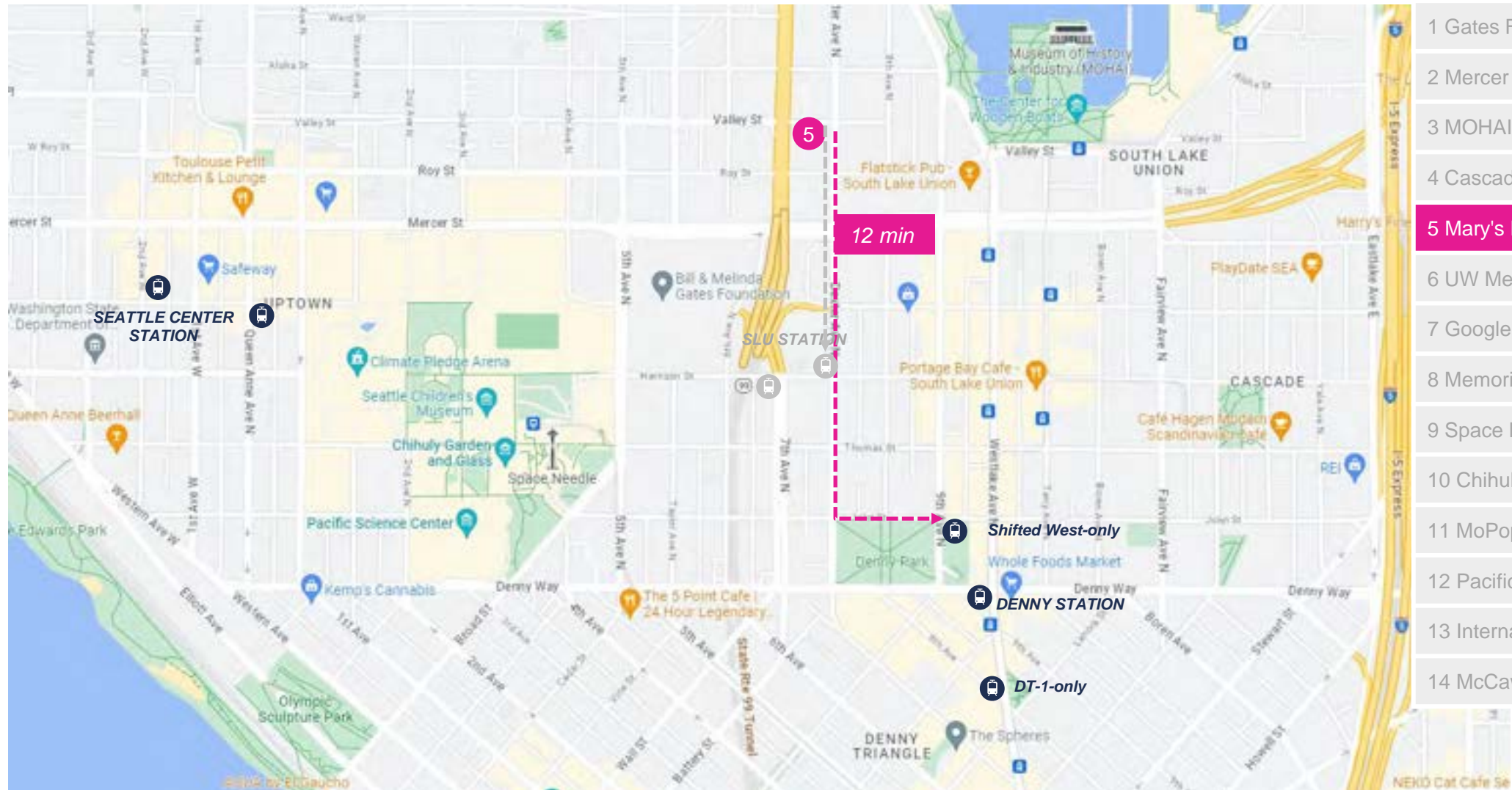
*Representative locations for illustrative purposes only. Does not reflect all potential destinations. Destinations to the south of Denny Way (e.g., Amazon) not highlighted as within walksheds of Denny and/or Westlake Stations.

Walk Access – with SLU



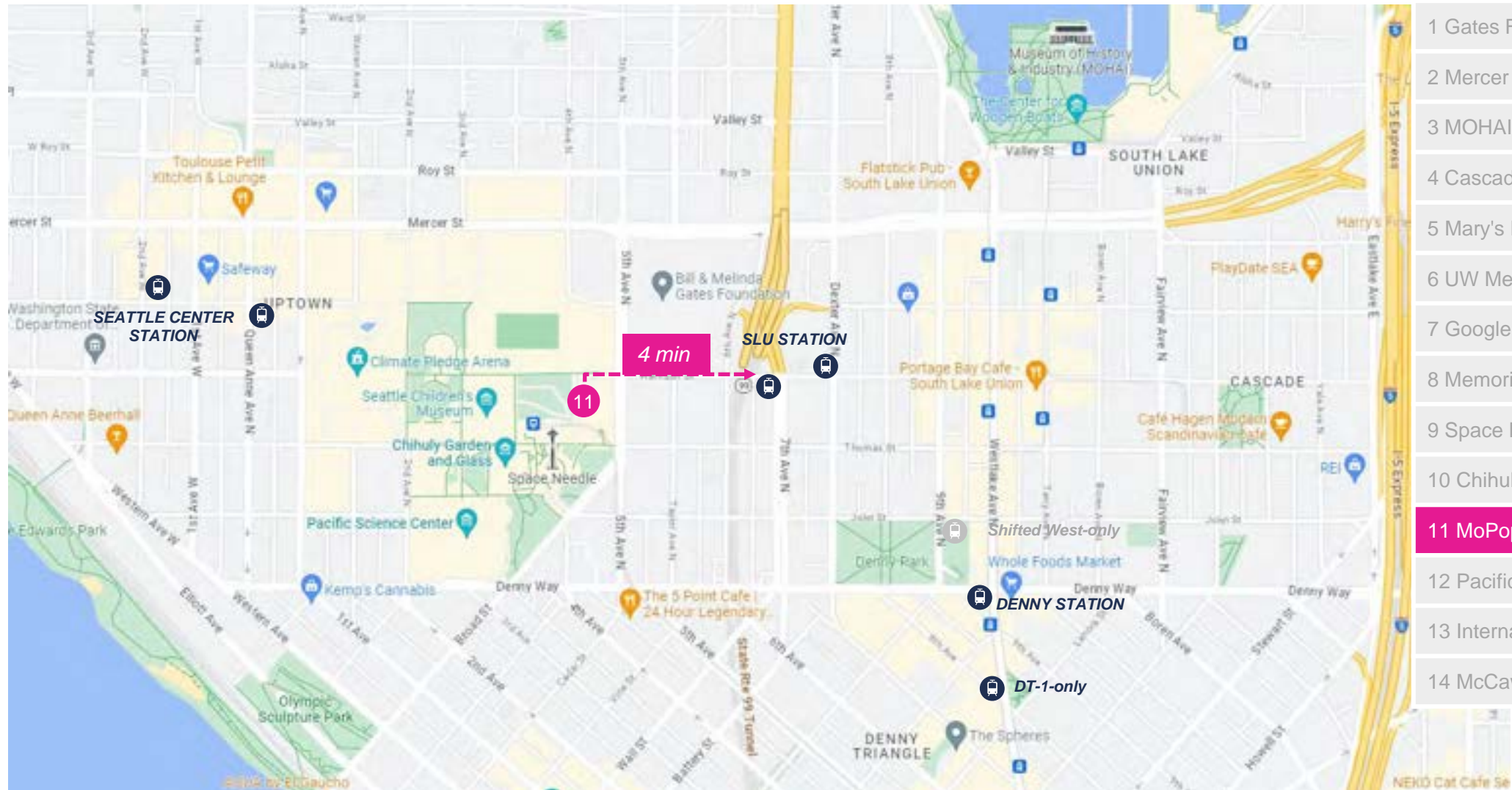
- 1 Gates Foundation
- 2 Mercer Mega Block
- 3 MOHAI
- 4 Cascade Playground
- 5 Mary's Place
- 6 UW Medicine Primary Care
- 7 Google
- 8 Memorial Stadium
- 9 Space Needle
- 10 Chihuly Gardens & Glass
- 11 MoPop
- 12 Pacific Science Center
- 13 International Fountain
- 14 McCaw Hall

Walk Access – without SLU



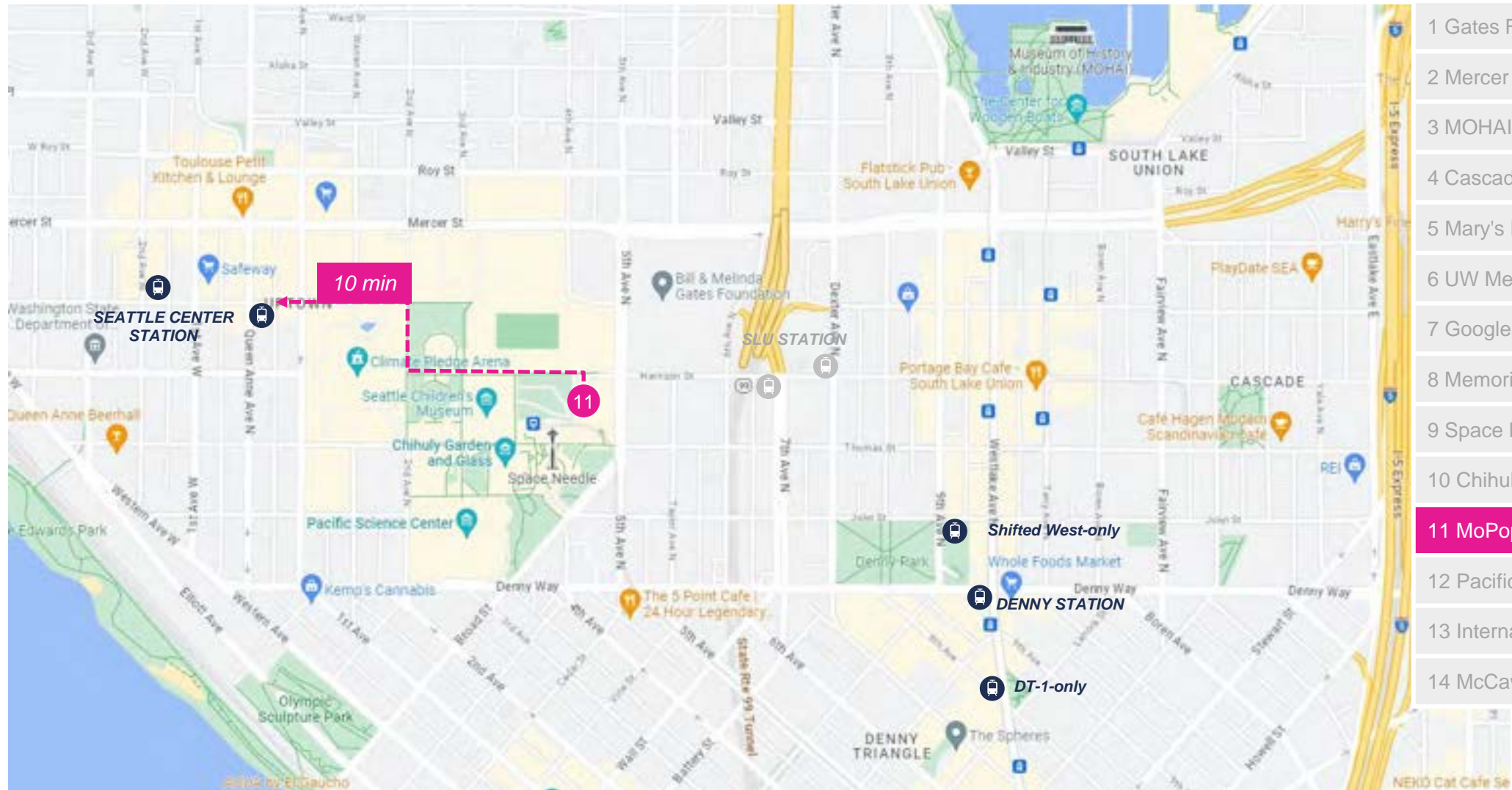
- 1 Gates Foundation
- 2 Mercer Mega Block
- 3 MOHA
- 4 Cascade Playground
- 5 Mary's Place
- 6 UW Medicine Primary Care
- 7 Google
- 8 Memorial Stadium
- 9 Space Needle
- 10 Chihuly Gardens & Glass
- 11 MoPop
- 12 Pacific Science Center
- 13 International Fountain
- 14 McCaw Hall

Walk Access – with SLU



- 1 Gates Foundation
- 2 Mercer Mega Block
- 3 MOHAI
- 4 Cascade Playground
- 5 Mary's Place
- 6 UW Medicine Primary Care
- 7 Google
- 8 Memorial Stadium
- 9 Space Needle
- 10 Chihuly Gardens & Glass
- 11 MoPop**
- 12 Pacific Science Center
- 13 International Fountain
- 14 McCaw Hall

Walk Access – without SLU



- 1 Gates Foundation
- 2 Mercer Mega Block
- 3 MOHA
- 4 Cascade Playground
- 5 Mary's Place
- 6 UW Medicine Primary Care
- 7 Google
- 8 Memorial Stadium
- 9 Space Needle
- 10 Chihuly Gardens & Glass
- 11 MoPop
- 12 Pacific Science Center
- 13 International Fountain
- 14 McCaw Hall

Equity

Racial Equity Toolkit

Outcomes

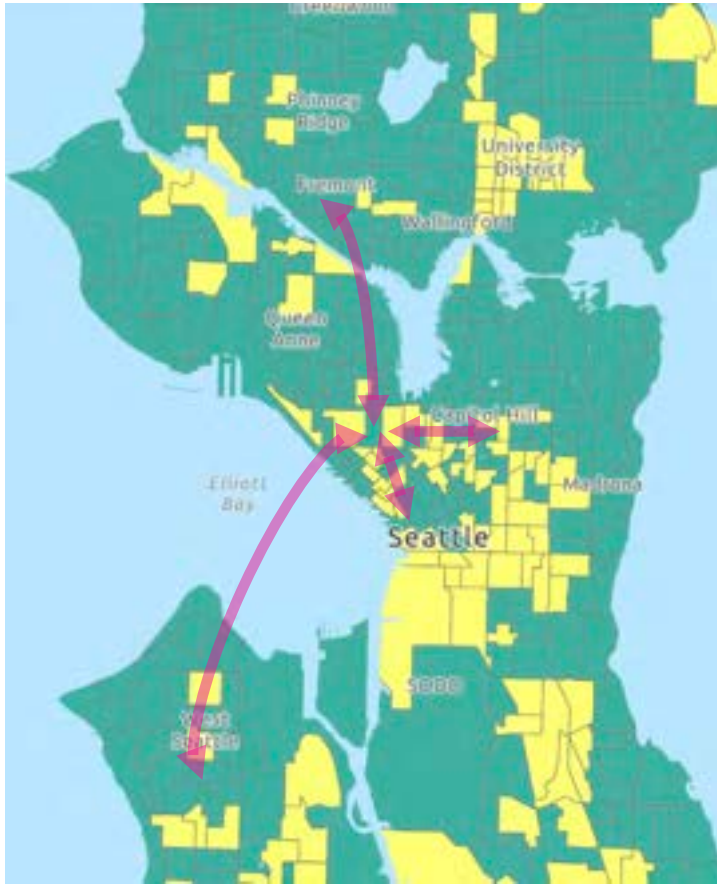
- Advance environmental and economic justice to improve economic and health outcomes for communities of color.
- Enhance mobility and access for communities of color and low-income populations;
- Create opportunities for equitable development that include expanding housing and community assets for communities of color;
- Avoid disproportionate impacts on communities of color and low-income populations;
- Create a sense of belonging for communities of color at all stations, making spaces where everyone sees themselves as belonging, feeling safe, and welcome; and
- Meaningfully involve communities of color and low-income populations in the project.

Racial Equity Toolkit

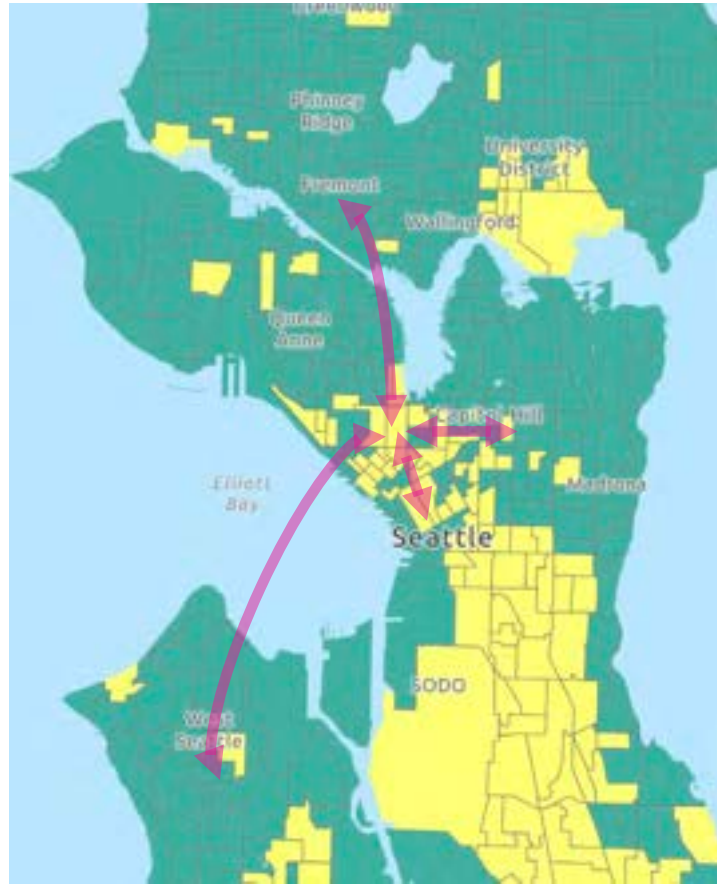
Outcomes

- Advance environmental and economic justice to improve economic and health outcomes for communities of color.
- Enhance mobility and access for communities of color and low-income populations;
- Create opportunities for equitable development that include expanding housing and community assets for communities of color;
- Avoid disproportionate impacts on communities of color and low-income populations;
- Create a sense of belonging for communities of color at all stations, making spaces where everyone sees themselves as belonging, feeling safe, and welcome; and
- Meaningfully involve communities of color and low-income populations in the project.

Equity



Low-Income



Communities of Color



Limited English Proficiency

■ At or Above Regional Average

■ Below Regional Average

***Seattle Center
access/capacity***

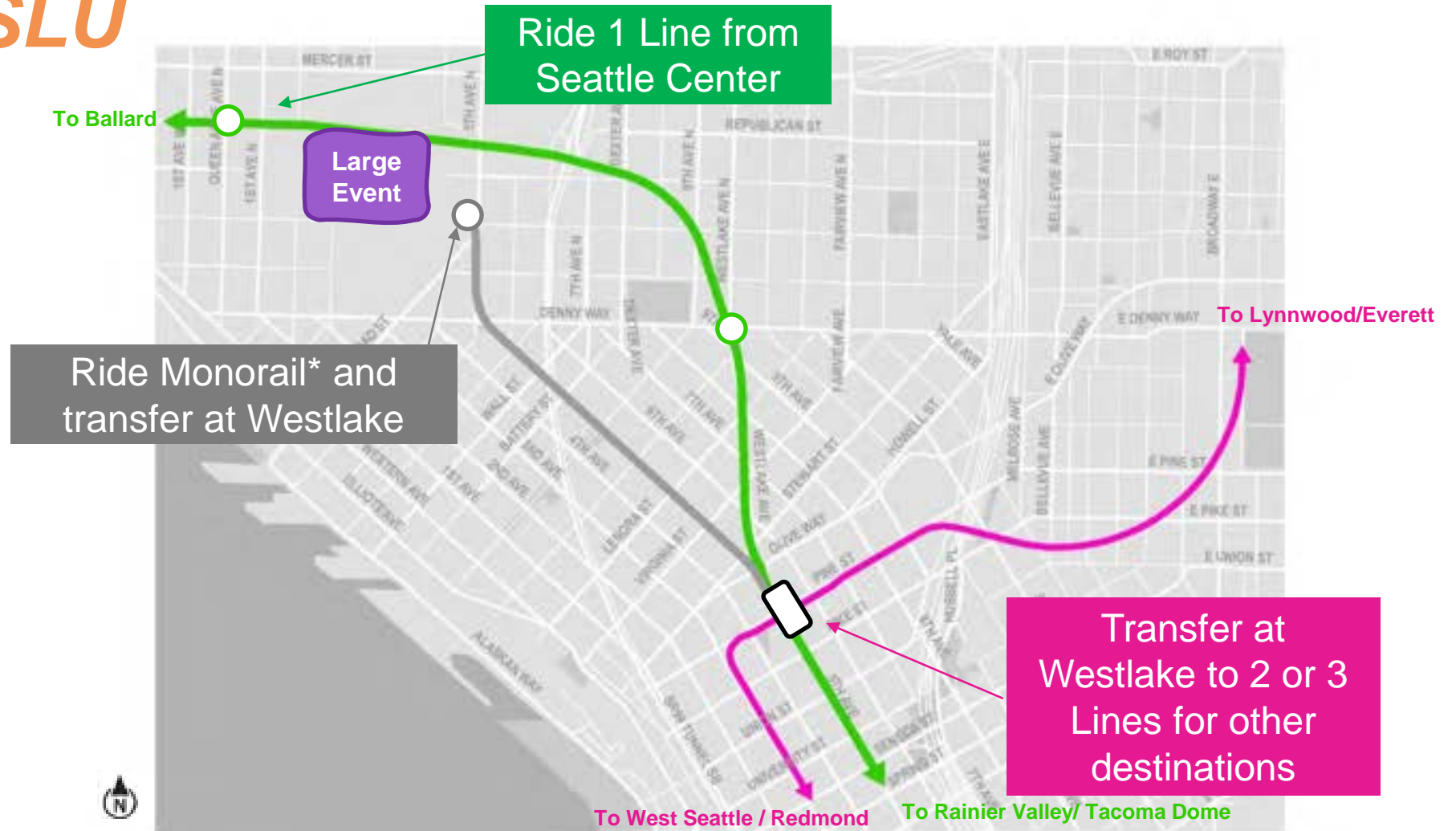
Seattle Center/ Large Events

With SLU



*At the time of station opening the monorail will be an 80-year-old system that would likely require major investment to upgrade the system

Seattle Center/ Large Events Without SLU



*At the time of station opening the monorail will be an 80-year-old system that would likely require major investment to upgrade the system

Three event scenarios:

Climate Pledge Arena



18,300

Memorial Stadium



12,000

Large Festival

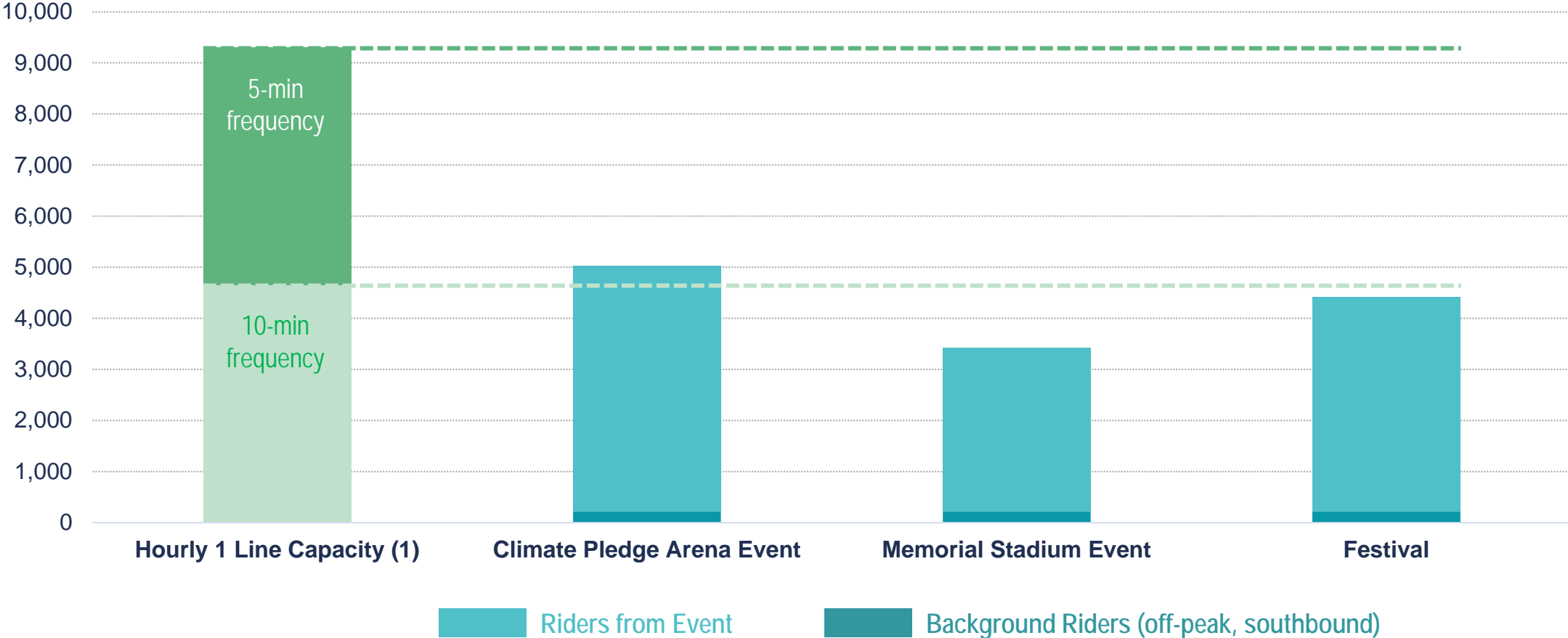


100,000 (per day)



Passenger Surge (Post Event)

Maximum Hourly Demand by Event Type

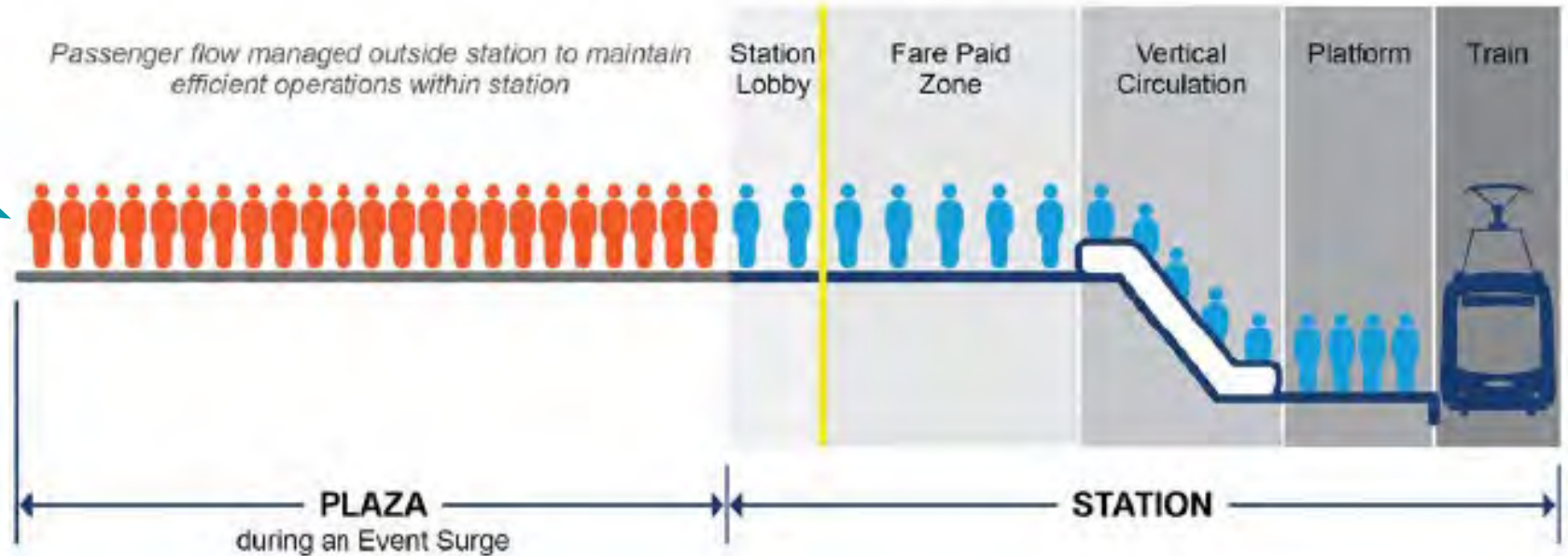


¹ Capacity for single direction of travel

Passenger Surge (Post Event)

If the anticipated passenger surge volume exceeds the capacity of the Link light rail system, Sound Transit will plan and deploy passenger flow management strategies at stations.¹

Metering occurs at venue, pathway to station, and at station entrance (if needed)



**For frequency of events at Seattle Center, passenger flow management would need to be in place through agreement with City, Climate Pledge, and other partners*



Denny Westlake

Denny Terry

Denny Westlake refinement options

	Draft EIS (DT-1)	SLU Mix-Match	Shifted North	Shifted West
Technical <i>street closures</i>	Westlake Ave fully closed to cars, buses and streetcar for 4 years during construction	Westlake Ave open to cars, buses and streetcar during construction	Westlake Ave temporarily decked during construction. Open to cars and buses but not streetcar. Reduced number of lanes for 3-4 years.	Westlake Ave substantially open to cars, buses and streetcar during construction; avoids closure of Harrison St
<i>utilities</i>	Sewer and electrical utilities on Westlake Ave; fiber crossing at Lenora St; major electrical utilities on Harrison St	Major relocation of fiber from Terry Ave onto adjacent streets (Boren, Denny); more extensive electrical utilities on Harrison St	Less extensive sewer and electrical utility work on Westlake Ave; avoids fiber crossing at Lenora St; major electrical utilities on Harrison St	Substantially avoids utilities on Westlake Ave and completely avoids major electrical utilities on Harrison St
<i>constructability</i>	Base case for constructability comparison	Extensive ground improvement/mined cavern on Harrison St (east of Dexter)	Phased in-street construction to maintain traffic adds construction complexity and extends duration of street effects (8 years vs 4 years)	Potentially shorter station construction duration due to improved site access and mostly off-street construction
Performance <i>ridership, transit integration, passenger experience</i>	Convenient transfer to transit on Westlake Ave	Minimal impact to ridership; short walk to transit lines on Westlake Ave; provides station access to both sides of Denny Way	Convenient transfer to transit on Westlake Ave	8,000 (5%) fewer weekday trips on Ballard Link Extension. Potential to re-route some bus lines to serve station location. Increased walk time to some destinations.
Cost <i>compared to Denny Westlake Draft EIS DT-1</i>	Base case for cost comparison	\$340m additional cost	\$170m additional cost*	\$440m cost savings due to consolidation of Denny and Harrison St stations*
Schedule <i>overall project delay</i>	Base case for schedule comparison	Uncertainty of fiber relocation could delay overall schedule	No delay to overall schedule	No delay to overall schedule
Risk <i>substantial cost, schedule, or feasibility risks</i>	Base case for risk comparison	Substantial disruption and litigation risk if inadvertently cut fiber lines	Potential property development risk	Potential property development risk; avoids major electrical utilities on Harrison St

Community feedback

Community feedback

- Broad interest in retaining both Denny and SLU stations to serve the density and activity of surrounding neighborhoods, including SLU, Belltown and Uptown.
- Concerns about reduced walk, bike and bus access and loss of light rail ridership associated with a consolidated station and potential for crowding at adjacent Seattle Center and Denny stations.
- Broad concerns about impacts to Westlake Avenue and interest in potential ideas to mitigate or limit full closure of Westlake Avenue and related effects to traffic, transit and businesses in the area.

Community feedback

- Interest in Shifted West alternative to avoid construction impacts on Westlake Avenue and related effects to the neighborhood, downtown recovery and to public and private investment in SLU.
- Some interest in whether a shifted west SLU station could be paired with a Shifted West Denny station to maintain two stations and avoid construction effects and utilities at SLU Harrison station location.
- Others concerned about a shifted west SLU station location because of potential for impacts in the vicinity.

Community feedback

- Strong interest in delivering on the voter approved plan and avoiding any further delay or additional cost associated with further studies of new concepts.
- Some interest in any opportunities to speed up delivery of the Ballard Link Extension project.
- Questions about opportunities for TOD, potential for additional funding, and about potential property effects and other construction effects.

Potential board action

Potential board action

Motion No. M2023-57

A motion of the Board of the Central Puget Sound Regional Transit Authority confirming or modifying the preferred station location for the Denny Station for the Ballard Link Extension Environmental Impact Statement

 *wsblink.participate.online*

 **SOUNDTRANSIT**

