

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.

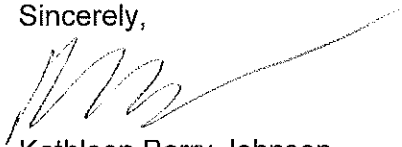
Gentrification is not a net-benefit to either district, as identified in the 2022 DEIS. Increased displacement risks for our residential and commercial tenants is a foreseeable, negative impact. Public safety both for construction and long-term operations will be impacted and should be addressed by the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