



July 10, 2023

Sent via email

Kathleen Barry Johnson
Executive Director
Historic South Downtown Community Preservation and Development Authority
409b Maynard Ave S
Seattle, Wa 98104

RE: Sound Transit West Seattle Link Extension and Ballard Link Extension Projects

Dear Kathleen,

The purpose of this letter is to update agency partners on the National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) process for Sound Transit's West Seattle Link Extension and Ballard Link Extension projects. These projects will expand Link light rail transit service from West Seattle to SODO and from Downtown Seattle to Ballard.

After completing a Draft Environmental Impact Statement that evaluated the combined West Seattle and Ballard Link extension projects, Sound Transit, in consultation with the Federal Transit Administration (FTA), determined that the environmental review process for the two extensions should continue separately. The two projects have different opening dates, and they will ultimately function as separate lines, with the West Seattle Link Extension connecting to Everett and the Ballard Link Extension connecting to Tacoma. The two projects are also now on different schedules for completion of environmental review.

The decision to separate the environmental review processes for these extensions was not made lightly, and it follows consideration of all the feedback received to date from the Tribes, agencies, and public. The information below summarizes the environmental process to date, explains the decision to separate the environmental review for the West Seattle Link Extension and the Ballard Link Extension projects moving forward, and describes anticipated next steps.

Project Background and Environmental Review Process to Date

The West Seattle Link Extension (WSLE) and Ballard Link Extension (BLE) projects are elements of the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The WSLE would be about 4.7 miles long and would include stations at SODO, Delridge, Avalon, and Alaska Junction. The BLE would be about 7.1 miles long and would include a new 3.3-mile light rail-only tunnel in Downtown Seattle. Stations for the BLE would serve Chinatown-International District, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard.

The WSLE is scheduled to begin service along the full line in 2032. The BLE is scheduled to begin service in 2039.

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Sound Transit and FTA evaluated both extensions under a single EIS because they have overlapping project areas and, when started, were on the same environmental review timeline. Combining the environmental review process for both extensions created efficiencies for lead agency, partner agency, and Tribal consultation, making the best use of staff resources during the extensive collaboration necessary to move the light rail extensions forward. The West Seattle and Ballard Link Extensions Draft EIS evaluated the WSLE separately from the BLE except where appropriate in the Cumulative Effects analysis. For example, Chapter 4, Affected Environment and Environmental Consequences was separated into two main sections: Section 4.2 West Seattle Link Extension, and Section 4.3 Ballard Link Extension. Each section separately evaluated the effects of the respective link extensions. Chapter 5, Cumulative Effects, evaluated the effects of the two extensions when considered together.

Key milestones to date are summarized below.

- February 2018: Early Scoping
 - Early scoping notice in the SEPA Register began Alternatives Development process under SEPA. Sound Transit notified interested agencies of early scoping for the combined projects
 - FTA initiated Government-to-Government consultation with federally recognized Tribes.
- February 2019: Formal Scoping
 - FTA published Notice of Intent (NOI) to prepare an EIS in the *Federal Register* (84 *Federal Register* 3541) began formal scoping for the combined West Seattle and Ballard Link Extensions Draft EIS under NEPA.
 - Sound Transit published a Determination of Significance in the SEPA Register
- May 2019: Identification of Draft EIS Alternatives and Preferred Alternative
 - Sound Transit Board directed staff to conduct an initial assessment of additional alternatives suggested during the EIS scoping period. Following completion of that initial assessment, the Sound Transit Board approved Motion M2019-104 in October 2019, which identified additional alternatives to study in the Draft EIS.
- January 2022: WSBLE Draft EIS published, followed by a 90-day public comment period.
- July 2022: Based on Draft EIS analysis and comments received from Tribes, the public, and agency partners, Sound Transit Board identified Preferred Alternative for the WSLE, directed staff to advance preliminary engineering and environmental review of WSLE, and directed staff to conduct further studies for the BLE.
- February 2023: Further studies for BLE were completed and the results and public feedback on the studies were presented to the Sound Transit Board.
- March 2023: Sound Transit Board identified Preferred Alternative for BLE.

Separating the Project Environmental Reviews

As described in the Draft EIS, the WSLE and the BLE would operate as separate lines in the light rail system. The Draft EIS evaluated both extensions together, because of their location, schedule, and review efficiencies for partner agencies as described above.

While the WSLE and BLE were evaluated together in the Draft EIS, given the Sound Transit Board's direction in July 2022 for further studies for the BLE and the additional environmental review needed for some of the project refinements resulting from the Sound Transit Board action in March 2023, environmental reviews for the two extensions are no longer on the same schedule. Rather than delay completion of the environmental review process for the WSLE while additional conceptual engineering and environmental review are conducted for the BLE, Sound Transit and FTA have decided to complete environmental review for each extension separately. Because they will operate as separate lines, the extensions are stand-alone projects with independent utility. Proceeding with separate environmental review processes for each extension enables Sound Transit and FTA to minimize delay in delivering

WSLE while further studies are undertaken on BLE. Advancing WSLE also minimizes further delay in providing a new high-capacity transit connection serving environmental justice communities south of the study area for whom the WSLE stations would be a transfer point when traveling to or through downtown.

Because the NEPA process for the two extensions began with one NOI in the Federal Register, FTA considered the appropriate steps under NEPA for continuing the process separately for the two extensions. FTA has determined that to separate the environmental review for the WSLE and BLE projects, the existing NOI published in the Federal Register in February 2019 can only continue to pertain to one extension, and the other extension will initiate a separate NEPA action under a new NOI.

The WSLE is more advanced, with preliminary engineering of the preferred alternative underway, therefore, FTA and Sound Transit will proceed with the WSLE under the existing NOI, redefining the project to remove the BLE portions. As described in the Draft EIS, the WSLE will consist of about 4.7 miles of new light rail line, including stations at SODO, Delridge, Avalon, and Alaska Junction. Sound Transit and FTA will proceed with the preparation and publication of a Final EIS for the WSLE, which is anticipated to be completed in 2024. The Final EIS will include responses to comments received on the West Seattle and Ballard Link Extensions Draft EIS that are related to the West Seattle Link Extension or are corridor-wide comments.

For the BLE, FTA and Sound Transit will issue a new NOI under NEPA. (There is no similar need to issue a new scoping notice under SEPA). All previous scoping comments, public outreach, and environmental analysis related to BLE will be carried forward into a new Draft NEPA/SEPA EIS focused on BLE. This Draft EIS also will contain additional analysis related to the Sound Transit Board's direction for further studies and a preferred alternative for BLE. The BLE Draft EIS publication will be followed by a public comment period.

Other federal programs that typically fall under the NEPA umbrella for evaluation -- such as Section 106 of the National Historic Preservation Act and the Endangered Species Act -- will also be divided and defined separately for the two extensions.

Next Steps

The following generally describes the anticipated next steps for the two light rail extensions. More detail will be provided as FTA and Sound Transit continue Tribal consultation and agency coordination for both extensions.

WSLE: In the coming months, Sound Transit and FTA will prepare the Final EIS for the WSLE project. The Final EIS will include the analysis from the West Seattle and Ballard Link Extensions Draft EIS for the WSLE alternatives, updated as appropriate, and will reflect the preferred alternative as well as other refinements/alternatives identified by the Sound Transit Board in July 2022. FTA and Sound Transit will continue to engage with Tribes, agencies and the public through the environmental review process. Publication of the Final EIS is currently anticipated in 2024, followed by the Sound Transit Board's selection of the project to be built and FTA's issuance of a Record of Decision. Sound Transit will then begin final design, permitting, property acquisition, and construction of the WSLE.

BLE: FTA and Sound Transit will issue a new NOI and prepare a separate Draft EIS focused on the BLE. That Draft EIS will carry forward the BLE analysis from the West Seattle and Ballard Link Extensions Draft EIS. The BLE alternatives will be updated as appropriate, including analysis of the preferred alternative as well as other refinements/alternatives identified by the Sound Transit Board in March 2023. FTA and Sound Transit will continue to engage with Tribes and agencies and will provide for public engagement consistent with NEPA and SEPA requirements. FTA will initiate Government-to-Government consultation and Section 106 consultation for the BLE project.

While a new NOI will be issued for BLE to ensure technical compliance with NEPA requirements, environmental review for the BLE is not starting over. The years of previous stakeholder engagement and environmental analysis will be used and included in preparing the Draft EIS focused on BLE. This includes all the feedback from Tribes, agencies, and the public received to date. For example, while a scoping period will be conducted along with issuance of the new NOI, commenters who previously provided scoping comments do not have to comment again as their previous comments will be carried forward. Comments made on the West Seattle and Ballard Link Extensions Draft EIS related to the Ballard Link Extension will also be considered during preparation of the Draft EIS focused on BLE and responded to as part of the BLE Final EIS.

In addition, the separate Draft EIS will rely on and incorporate the existing work to date based on various NEPA and FTA statutes and regulations that support streamlining and avoiding duplication. The separate Draft EIS also will meet recent changes to Federal law that require that the Record of Decision (ROD) be issued within two years of issuance of the NOI. The separate Draft EIS will include the same analysis for the BLE alternatives as the previous Draft EIS that was issued for the combined West Seattle and Ballard Link Extensions, with updates as appropriate to reflect project refinements and other changes. Details of the BLE environmental review will be shared when available.

Sound Transit and FTA will ensure the public is made aware of this decision to separate the environmental documents for the West Seattle and Ballard Link Extensions through Sound Transit's robust public outreach program, including email updates, website, discussion at Sound Transit board meetings, workshops, and community fairs.

FTA and Sound Transit look forward to continuing our coordination and consultation for both projects as they move forward through the NEPA/SEPA processes. If you have any questions about the projects or the revised approach to environmental review, please contact Lauren Swift, Central Corridor Environmental Manager, at lauren.swift@soundtransit.org or 206/398-5301, or Mark Assam, Environmental Protection Specialist, at mark.assam@dot.gov or 206/220-4465.

Sincerely,

Cathal Ridge

Cathal Ridge, Executive Corridor Director

cc: MaryKate Ryan, Community Preservation Associate, Historic South Downtown Community Preservation and Development Authority
Lauren Swift, Central Corridor Environmental Manager, Sound Transit
Leda Chahim, Government & Community Relations Manager Central Corridor, Sound Transit
Alex Stevenson, Manager-Cultural Resources, Sound Transit
Kent Hale, Director-Environmental Planning, Sound Transit
Mark Assam, Environmental Protection Specialist, FTA