



City of Seattle

# Seattle Planning Commission

March 25, 2019

WSBLE

c/o Lauren Swift, Central Corridor Environmental Manager

Sound Transit

401 S. Jackson Street

Seattle, WA 98104-2826

*(delivered via e-mail: [WSBscopingcomments@soundtransit.org](mailto:WSBscopingcomments@soundtransit.org))*

Dear Ms. Swift:

The Seattle Planning Commission is a 16-member independent, volunteer advisory body. We provide guidance and recommendations to the City of Seattle Mayor and City Council, as well as City departments on planning goals, policies and plans for the physical development of the City. We are pleased to submit the following scoping comments and recommendations on Sound Transit's West Seattle and Ballard Link Extensions project. The Planning Commission is very supportive of this project and recognizes that Seattle's growth necessitates a significant investment in transit. We offer comments on alternatives to be studied in the Environmental Impact Statement (EIS), recommendations regarding individual impacts to be evaluated, and salient observations pertaining to individual project segments.

### **Overarching Recommendations**

- The Commission strongly urges Sound Transit to evaluate the benefits and impacts of the proposed West Seattle and Ballard Link Extensions through a lens that considers a hundred-year horizon, well beyond the short-term construction timeline for this project.
- We encourage Sound Transit to remove the Representative Project from consideration as an alternative to be studied in the Draft EIS. We recognize that this conceptual alignment was included in the ST3 ballot measure. However, the extensive feedback and analysis conducted since make it clear that changes are necessary for the project to meet the intended purpose and need.
- We endorse the intention to study both a "fully funded" alternative and others that could require third-party funding. While a need for third-party funding should be identified where relevant, preliminary cost estimates should not be used to eliminate alternatives or station options.
- We encourage studying mix-and-match combinations of the best potential alignments.

### Commissioners

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### Staff

Vanessa Murdock  
*Executive Director*

Connie Combs  
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John Hoey,  
*Senior Policy Analyst*

Robin Magonegil  
*Administrative Analyst*

### Land Use Impacts

The Planning Commission serves as the steward of Seattle's Comprehensive Plan. This Plan and its Future Land Use Map reflect Seattle's adopted vision for managing growth.

- Please include in the Draft EIS a map of properties affected or acquired for purposes of construction, staging, and ancillary facilities.

### *Transit-Oriented Development*

- To maximize the transit investment, the Commission expects to recommend zoning and policy changes to encourage density and affordable mixed use in and around station areas. The land use and economic development analyses in the EIS should take this into account. The EIS should recognize the potential for transit-oriented development that may require updates to the Comprehensive Plan's Future Land Use Map and/or zoning changes in the vicinity of any station areas.
- The Commission would appreciate the opportunity to review the methodology to be used for quantifying potential transit-oriented development around all station areas.

### *Industrial Lands*

- The Commission desires that any preferred alternative(s) will minimize or avoid impacts to the long-term viability of Seattle's industrial lands. To that end, we request robust analysis of potential displacement of industrial businesses, impacts to freight corridors, and the resulting short- and long-term economic, transportation, and construction effects.
- Please evaluate the potential for transit-oriented development and associated ridership both with a continued industrial designation and with zoning that anticipates residential and commercial uses. As one basis for that analysis, please begin with lessons learned from the location and use of the existing SODO station.

### Race and Social Equity Impacts

- We are encouraged that Sound Transit has partnered with the City of Seattle on the application of the Racial Equity Toolkit. The Commission recommends continued partnership and rigorous assessment of the racial equity impacts when analyzing station locations and alignments that bring disproportionate short- and long-term impacts to the affected communities. Use analyses in the EIS to select a final alignment whose cumulative benefits do not come at the expense of communities experiencing historic and current inequities.
- Other considerations besides cost, including service to vulnerable and historically underserved populations, should inform the decision to have elevated, surface, or underground alignments.
- The Commission would appreciate the opportunity to review the methodology to be used for analyses of displacement and environmental justice. We recommend incorporating data and themes from the City of Seattle's Equity Analysis and Equitable Development Initiative.
- While negative impacts may be experienced along all alternatives and alignments, we urge you to pay particular attention to identifying and avoiding these impacts in the Chinatown/International District (C/ID) and Delridge neighborhoods. Where necessary, identify mitigation measures that meet the long-term needs of those communities.

### Aesthetic and Quality-of-Life Impacts

- The Commission recommends studying the qualitative impacts of all guideways of a significant height, potentially up to 160 feet high. These high guideways and the associated station platforms present accessibility and safety challenges, as well as significant visual and quality of life impacts to the communities these alignments will traverse.
- The existing images provided by Sound Transit do not sufficiently demonstrate the anticipated cumulative effects of the elevated guideways and stations. Additional modeling and visualizations, especially from a ground-level pedestrian perspective, are essential to understanding the potential impacts of these alternatives. We suggest using the latest and best visualization technology and methods, including photorealistic 3-D imagery.
- We recommend identifying all short- and long-term impacts to view corridors.

### Access to Stations

- We recommend conducting an access assessment at all station areas, including at-grade, elevated, and tunnel stations. This analysis should consider topography, land use, and pedestrian networks. Sound Transit should make the system user-friendly, including ease of transfers and access to destinations after leaving the stations.
- Study and identify any potential barriers to achieving universal accessibility for those with disabilities, mobility challenges, and other special needs such as strollers. Station entrances should allow multiple entries to serve both ends of stations, especially in areas with different grades.

### Site-Specific Considerations and EIS Scoping Recommendations

#### West Seattle/Duwamish Segment

##### *Alaska Junction*

- The terminus station at the Alaska Junction must be sited and designed to best meet the needs of existing and future land uses in the vicinity.
- We recommend studying any potential economic and visual impacts associated with elevated guideways and station platforms in the historic Alaska Junction commercial district.

##### *Delridge*

- Please quantify the potential for future development surrounding the various station options, including equitable transit-oriented development and affordable housing. Study bus integration and multi-modal opportunities at each station location.
- We recommend studying visual impacts and access issues at this location. Alternatives with higher elevated alignments and station platforms would negatively impact the quality of life for those who live and work in the Delridge community, particularly to people with disabilities.
- We recommend a rigorous analysis to identify, minimize and avoid commercial and residential displacement resulting from guideway and station construction. We request an assessment that describes the ability and likelihood of any potentially affected property owners to relocate within the same area.

### *Duwamish Crossing*

- We recommend studying fish and wildlife, economic, environmental (specifically sea-level rise), and transportation impacts. It is also of critical importance that Sound Transit consult with any affected tribes, including the Duwamish Tribe, to identify, minimize, or avoid impacts to cultural resources. The Planning Commission supports a bridge alignment crossing the Duwamish River that balances cost while limiting impacts to the Duwamish Greenbelt and maritime industrial operations.

### SODO and Chinatown/ID Segment

#### *SODO*

- The Commission encourages the study of alignment options that eliminate the need for an interim transfer at SODO for West Seattle riders while the Ballard extension is being built. If an interim transfer is a necessity, we have concerns about the pedestrian connectivity between the existing and new stations. Study the potential for consolidating stations (for the short- and long-term) at this location and improving pedestrian access.
- We recommend a rigorous assessment of future ridership at this station. The existing SODO and Stadium stations have demonstrated low ridership numbers, and we question the need for a new station in this segment. Additional stations should only be created if potential new development and employment in the SODO neighborhood indicate potential for increased ridership.
- Please study the impacts to bus routes using the E-3 busway.

#### *Chinatown/International District (C/ID)*

- The Commission feels strongly that equity needs to be a priority consideration in the analysis and eventual selection of a new C/ID station location, and the associated construction method. This historic, culturally significant neighborhood has been traditionally underserved, and repeatedly subjected to disruptive capital improvement projects.
- Study construction-related short- and long-term effects including displacement, environmental justice, and economic impacts related to small business disruptions.
- Quantify both the potential short-term and long-term economic impacts resulting from cut-and-cover construction on 5<sup>th</sup> Avenue S, given the equity concerns associated with this construction method in the C/ID.
- As an alternative to the 5<sup>th</sup> Avenue S location, the Planning Commission endorses the study of a 4<sup>th</sup> Avenue S alignment and station location employing a cut-and-cover construction method.
- We do not support further consideration of the deep-mined station options on either 4<sup>th</sup> or 5<sup>th</sup> Avenues. These options would limit ease of connectivity between stations. Furthermore, they would require elevators for station access (the lack of escalators at a significant regional transportation hub raises safety concerns).
- We recommend a rigorous assessment of several topics related to development of a new C/ID station:
  - Ease of station access and pedestrian connections between the existing and new tunnel stations;
  - Multi-modal connections, including bus, streetcar, and non-motorized options, as well as Sounder and Amtrak trains at King Street Station;
  - Impacts to automobile and bus traffic on both 4<sup>th</sup> and 5<sup>th</sup> Avenues;

- Benefits of activating Union Station as a vibrant regional multi-modal hub, including local business enhancement, historic and cultural recognition, and placemaking opportunities.

### Downtown

- Assess pedestrian access to the proposed Midtown stations, including topography and distance from the existing transit tunnel stations.
- Study ridership and transit integration at the proposed South Lake Union stations. Harrison Street is a significant east-west transit corridor. This station represents a multi-modal opportunity to maximize transit ridership in a rapidly growing neighborhood.

### Interbay/Ballard Segment

#### *Smith Cove-Interbay*

- The Commission recommends prioritizing further study of the Smith Cove station location closest to Terminal 91, as that location has better transit-oriented development potential than station locations further south on Elliott Avenue W.
- Study ridership, transit integration, and non-motorized/pedestrian access at the proposed Smith Cove station locations.
- We also recommend studying the risk of sea level rise around any proposed Smith Cove station including the Armory site and areas to the south.
- The Commission recommends analyzing the potential for transit-oriented development at each of the proposed Interbay station locations, as land use in Interbay has the potential to change with station siting. (For example, future development in this area could lead to a new urban village on either side of the Dravus Street bridge, including the lower east slope of Magnolia.)

#### *Salmon Bay Crossing*

- The Commission recommends eliminating a movable bridge and any bridge alternatives adjacent to 15<sup>th</sup> Avenue NW from further consideration. A bridge at this location would be disruptive to operations at Fishermen's Terminal.
- Study the impacts associated with any bridge structures over Salmon Bay, including impacts to navigation, maritime and industrial businesses, water resources, fish and wildlife, and aesthetics.
- We recommend evaluating the potential for a new multi-modal bridge serving light rail, bikes, and pedestrians.

#### *Ballard Terminus*

- The Commission recommends for further study the alternatives with a Ballard terminus on 14<sup>th</sup> Avenue NW. This location offers a wide right-of-way, provides opportunities for transit-oriented development in the station vicinity, and would be less disruptive (e.g. fewer property acquisitions) than the 15<sup>th</sup> Avenue NW alternatives. Please study potential economic impacts, including displacement, to industrial land uses in the Ballard/Interbay/Northend Manufacturing and Industrial Center immediately to the south of the proposed 14<sup>th</sup> Avenue NW station location. We also request analysis of the viability of extending the line to the north of this station.

- We recommend evaluating transit integration and non-motorized (bike/pedestrian) access at each of the proposed station locations.

Thank you for your consideration of our comments. If you have any questions, please do not hesitate to contact me or our Executive Director, Vanessa Murdock, at 206-733-9271.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Austin', written in a cursive style.

Michael Austin, Chair  
Seattle Planning Commission

cc:

Seattle Mayor Jenny Durkan  
Seattle City Council President Bruce Harrell; Seattle City Councilmembers Sally Bagshaw, Lorena Gonzalez,  
Lisa Herbold, , Rob Johnson and Mike O'Brien,  
Anne C. Fennessy