

City of Seattle Comments on the West Seattle and Ballard Link Extensions (WSBLE) Project Draft Environmental Impact Statement

Attachments B-M

April 28, 2022

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Attachment A: City Consolidated Comments

See comment matrix for the City's formal comments, separately attached.

Attachment B: Racial Equity Toolkit and Environmental Justice

Seattle and Sound Transit are collaborating on the development of a racial equity analysis using the City's Racial Equity Toolkit (RET) to ensure equitable distribution of project benefits and avoid disparate impacts to communities of color and low-income populations. As the RET was being developed, Sound Transit completed an Environmental Justice (EJ) Analysis as Appendix G of the WSBLE DEIS. While the RET and EJ analyses employ different methodologies, results from each were to be integrated to help inform and solicit feedback from community. The City finds that the DEIS and the EJ Analysis is missing critical analysis and mitigation proposals to support the conclusion that with offsetting benefits the project would not result in disproportionately high and adverse effects on environmental justice populations. The City offers many comments on how to strengthen the EJ Analysis and better integrate the EJ Analysis and the RET in advance of the FEIS.

The City has valued Sound Transit's partnership on developing a joint Racial Equity Toolkit (RET) to ensure equitable distribution of project benefits and avoid disparate impacts to communities of color and low-income populations. This multi-year effort incorporates community engagement and technical analysis to help further the following RET outcomes throughout the project:

- 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.
- Meaningfully involve communities of color and low-income populations in the project.

In addition, the RET identifies two communities, the Chinatown-International District (CID) and Delridge neighborhoods, for additional analysis and public engagement.

Sound Transit completed an EJ Analysis as part of the WSBLE DEIS. While the RET and EJ Analysis employ different methodologies, results from each were expected to be integrated to help inform and solicit feedback from community. The City's review of the DEIS EJ Analysis finds many missing pieces, particularly connecting information from other sections of the DEIS, and missing opportunities to better align and complement the DEIS with the work of the interagency RET, including strengthening methodology, providing additional information, and partnering on next steps and community processes to further racially equitable outcomes from the project. The following summarizes our comments. More detailed comments related to racial equity and environmental justice can be found in *Attachment A: City Consolidated Comments* and *Attachment M: Community Engagement*.

The EJ Analysis is missing relevant information and analyses from other DEIS Chapters. For example:

- **Economics.** The Economics chapter is missing an analysis of the scale of economic impact from business displacements, road closures, and other construction impacts to the community in Delridge. The DEIS does not address whether displaced businesses are small businesses, cultural anchors, or other community serving businesses, and does not identify indirect effects of these displacements.
- **Acquisitions and displacements.** The DEIS proposes that most displaced businesses can be relocated 'successfully' within the project vicinity. This does not consider the impact to businesses relying on a localized customer base, the availability of suitable commercial space at comparable rates, nor the viability of Sound Transit's available funding and tools under FTA policy to support relocation. This is particularly important in the CID.
- **Social resources, community facilities, and neighborhoods.** This section of the DEIS states that in the Delridge neighborhood, the project will impact low-income housing to a greater degree, thereby affecting EJ populations. It is unclear why this is not an adverse and disproportionately high impact. Similarly, the DEIS does not look at business impacts in the CID from road closures and parking loss. It does not evaluate post-pandemic impacts, especially to small businesses.
- **Cumulative impacts.** The DEIS and EJ Analysis do not address historic harm or cumulative impacts from multiple large capital projects to neighborhood cohesion in the CID.

The EJ Analysis (DEIS Appendix G) should include additional information and analysis. For example:

- **Expand the study area for Delridge.** The study area should be extended, especially south of the Delridge station to capture communities that will access stations by bus. Sound Transit should consider a Transit Access Study to better understand the needs of the several neighborhoods to the south of the Delridge station that have been identified in the RET.
- **Identify social resources and clients served.** The analysis should include a list of social resources impacted by the project, including organization names, descriptions, and clients served.
- **Unsheltered people.** Unsheltered people are low-income EJ populations. The analysis should include a complete evaluation of unsheltered people and available shelters by segment.
- **Affordable housing.** Analyses of the impact to affordable housing is not captured. It should be explicitly listed in DEIS by federal and local definition, as the loss of affordable housing would be an impact on the human environment and neighborhood.
- **Equity.** Specific missing impacts have been provided in the consolidated comments in *Attachment A*, including more information on air quality (especially in the CID), pedestrian Level of Service, the indirect economic and cultural impacts of the project. See also *Attachment D: Methodology and Analytics*.
- **Relocation.** "Research indicates that there are adequate opportunities for most residents and businesses to successfully relocate within the project vicinity". These terms need to be defined and assumptions validated.

Findings. The City strongly disagrees with following conclusions of the EJ Analysis:

"[With] offsetting benefits...the West Seattle Link Extension would not result in disproportionately high and adverse effects on environmental justice populations." (Appendix G, Page 7-1)

“Combined with this mitigation and the offsetting benefits, impacts of the Ballard Link Extension would not be high and adverse to environmental justice populations.” (Appendix G, Page 7-2)

The DEIS and EJ Analysis, as currently drafted, do not include the level of analysis and mitigation measures needed to support these conclusions. Furthermore, additional public engagement is needed to support any conclusions about impacts to minority and low-income populations.

Next steps. In addition to written responses to the City’s formal comments in *Attachment A: City Consolidated Comments*, and the subset highlighted above, the City would like to work with Sound Transit through development of the FEIS on the following:

1. **RET Report.** Update the 2022 RET Report based on DEIS comments from community and additional engagement between the DEIS and FEIS on refinements to the DEIS alternatives and project mitigation measures.
2. **Targeted Engagement in Chinatown-International District.** The City supports additional engagement with the CID community to Refine alternatives to avoid/minimize impacts, provide more complete mitigation, and develop a partnership between the public and private sectors and community to address longer-term impacts and historic harm.
3. **Targeted Engagement in Delridge.** The City supports additional engagement between the DEIS and FEIS with RET-identified communities in South Delridge who will rely on bus-rail integration to access the light rail station at Delridge. This engagement process should seek to confirm with community the Board action on a Preferred Alternative and look for ways to further RET outcomes and North Delridge Action Plan goals.
4. **Mitigation.** Develop together with the City, community, and other relevant stakeholders and partner agencies, a comprehensive mitigation plan in advance of the FEIS that considers strategies to mitigate impacts to RET populations throughout the entire system, including but not limited to, strategies to reduce displacement of low-income households and provide support to small businesses during construction. See *Attachment J: Mitigation*, for further discussion.

Attachment C: Compliance

The City of Seattle is responsible for issuing local permits for the WSBLE project. The City cannot permit the project if it does not comply with City codes, rules, plans, and regulations. The DEIS demonstrates several instances in which compliance with local regulations is unclear. These compliance issues should be resolved and documented in the FEIS to avoid potential cost and delay in the project permitting process.

The following list highlights compliance concerns where the DEIS is either silent on a potential compliance issue or where the DEIS presents information that suggests the project may not comply with City codes, rules, plans, and regulations. If unresolved, these compliance issues may impact the City's ability to permit project. A comprehensive inventory of these issues may be found in the City's formal DEIS comments in *Attachment A: City Consolidated Comments*.

- 1. Stormwater.** The proposed alignments are not in compliance with regulations for stormwater management related to guideways. Seattle Public Utilities (SPU) cannot permit the project as shown in the DEIS designs. Sound Transit asserts that guideways are non-pollution-generating surfaces. This is incorrect. The Washington State Department of Ecology (Ecology) has judged them to be pollution-generating surfaces. Unless Ecology revises that determination based on new data, the project must meet the City's Stormwater Code (SMC 22.800-22.808).
- 2. Land Use.** The information necessary to identify impacts, compare alternatives and demonstrate compliance with city code is missing. The analysis in the DEIS does not identify the above grade guideway segments that would be located above the maximum allowed zoning height (SMC 23).
- 3. Noise.** References to Seattle Noise Ordinance (SMC 25.08) are missing from the operational noise impact analysis, therefore, the potential conflict with local controls and policies cannot be determined. The DEIS uses FTA methodology to establish impacts and the required mitigation for operational sound levels. That FTA standard is not used in the Seattle Municipal Code (SMC) nor in the Washington Administrative Code (WAC). Exterior sound level limits of SMC 25.08.410 and .420 must also be used to evaluate impacts of the project.
- 4. Historic Preservation.** References to Seattle Municipal Code sections are missing related to implementation of the City's Historic Preservation regulations. The references to when a Certificate of Approval (SMC 25.12 and SMC 23.66) is required for alterations within historic districts (demolition, construction of stations, venting structures, head houses etc.) or to individual landmarks. Additionally, the regulations regarding referral to the Landmarks Preservation Board of nominations for potentially eligible resources that are proposed for demolition or substantial alteration are not addressed (SMC 25.05.675H2c and SMC 25.12). Therefore, the potential conflict with local controls and policies cannot be determined.
- 5. Shoreline and Environmentally Critical Areas.** The Compensatory Mitigation sections in the Ecosystems chapter prioritize off-site or in lieu fee mitigation measures which do not address City of Seattle Shoreline Code requirements (SMC 23.60A.158 and SMC 23.60A.159) or the Environmentally Critical Areas (ECA) mitigation sequencing priority (SMC 25.09.065). Avoidance, minimization, and in-project area mitigation sites should be considered in advance of off-site and/or in-lieu fee

mitigation measures. Table B for SMC 25.09.160 should be referenced regarding mitigation measures for wetlands.

- 6. Overwater and In-water Structures.** Due to the negative impacts of overwater structures and in-water structures (i.e., bridge alternatives) to the salmonids and other aquatic species using the Ship Canal, the King County in-lieu fee program (or other mitigation locations outside Seattle) is very likely not to be a viable or appropriate option for compensatory mitigation due to City of Seattle Shoreline Code requirements (SMC 23.60A.158 and SMC 23.60A.159).
- 7. Geology and Soils.** The Prospect Street portal, Smith Cove Station site, and alignments along the west side of Queen Anne are in Environmentally Critical Areas (ECA) steep slope and potential slide. These project components will likely require considerable efforts to provide complete stabilization to protect the facility from landslides emanating from the ECA Steep Slope Area.
- 8. Seattle Municipal Code Title 15.** Title 15 covers protection and repair of features in public places, including sidewalk, pavement, sewers, drain inlets, catch basins, green stormwater infrastructure, streets, trees, or any other public facility or assets, that are impacted by construction activities (SMC 15.22.080). In accordance with Title 15, the Right-of-Way Opening and Restoration Rules (ROWRR) describes references, requirements, and standards that must be met when making or restoring openings in the public right-of-way. The DEIS does not cite compliance with Title 15, the ROWRR, or City of Seattle Standard Plans and Standard Specifications for Road, Bridge, and Municipal Construction, for roadway and sidewalk facilities restored as part of construction activities. Additionally, the Utilities section of the DEIS does not describe restoration within the ROW as a project impact for utility relocations during construction.
- 9. Visual Quality and Aesthetics.** The analysis is incomplete and appears not to be compliant with SMC 23.66. In order to show analysis could lead to compliance with SMC 23.55, visual impacts of station entrances and related components, headhouses, venting, bike parking, etc. require further analysis of the siting of these elements in consideration of visual cohesion and architectural character within the Pioneer Square Preservation District and International Special Review District. All elements above grade, including, but not limited to paving, street furnishings, bicycle parking, signage, lighting and landscaping will require a Certificate of Approval from the Department of Neighborhoods. This will include review and a recommendation by the respective historic review Boards, pursuant to Chapter SMC 23.66.

Next steps. The City offers continued support to explore code amendments, as appropriate, with ST and with community. Several of our codes and policies do not anticipate the unique complexity associated with constructing a linear transportation project such as the West Seattle and Ballard Link Extensions. Per the Partnering Agreement, the City continues to review development regulations and processes that will likely be applicable to the project and identify code changes and process reform actions necessary to streamline the permit review process or resolve code conflicts. Community outreach will be conducted later this year for consideration of proposed code reforms.

The need to resolve outstanding compliance issues must be addressed by release of the FEIS to avoid later delays. If the City's concerns regarding local regulations are not adequately addressed through the environmental review process, it is unlikely that the FEIS and ROD will sufficiently meet the City's needs—thereby requiring the City to request additional analysis and mitigation during the permitting process and creating unknown delays we all want to avoid. Streamlining the permitting process requires an adequate analysis of impacts and mitigation in the DEIS, FEIS, and ROD to minimize the need for identifying additional mitigation later during the permitting process.

Attachment D: Methodology and Analytics

Many sections of the DEIS are missing information and analysis necessary to understand the full complement of project impacts. Without this information or analyses it is difficult to fully compare alternatives and develop appropriate mitigation. We also found several areas where we did not agree with the methodology or assumptions used to evaluate impacts.

The following list provides representative examples of missing information, incomplete analyses, and disagreement on methodology and assumptions. A comprehensive list of these issues may be found in the City's formal DEIS comments in *Attachment A: City Consolidated Comments*.

1. Examples of missing information or analysis:

- **Business and Residential Displacements.** See *Attachment I* for additional information on the City's comments related to displacement. The City finds information, analysis, and/or mitigation missing for the following:
 - Impacts to minority-owned businesses and employees, particularly BIPOC businesses and employees, have not been fully evaluated throughout the corridor.
 - Impacts to residential property owners and renters, including low-income and BIPOC communities. The information necessary to identify impacts and compare alternatives for acquisitions, displacements, and relocations is missing.
 - Demographic and socio-economic data for each displacement and impacts of acquisitions and displacements on Mandatory Housing Affordability (MHA) units.
 - The results of businesses and residential displacements needs to be further evaluated in terms of community cohesion and gentrification including impacts to low income and BIPOC communities. Mitigation measures need to be proposed.
- **Economic and Social Impacts.** The evaluation of social resources and community cohesion in the Chinatown/International District (CID) is incomplete. Many cultural and social resources vital to the community are missing in the DEIS including Summit Sierra School, the Chinese Language school at Chong Wa Benevolent Association, and the Puget Sound Community School. There is also no mention of Theatre Off Jackson. Donnie Chin International Children's Park is mis-identified, and Kobe Terrace Park and the Danny Woo Community Garden are omitted. Missing is discussion of the indirect impacts to neighborhood social and cultural cohesion outside of the immediate CID station area.
- **Environmental Justice and the RET:** The Chinatown-International District is a RET identified community that has historically experienced disproportionate impacts from government actions. Impacts to the community have not been fully evaluated, including the following:
 - Analysis of indirect impacts such as economic displacement resulting from potential land value increases after completion of the project.
 - Construction disruption, especially to the small businesses that are struggling in the current recession need to be included in the analysis.
 - Impact of street closures, rerouting, and transit changes to business and residents.

- Discussion of cultural displacement and the broader consequences to culturally unique and sensitive businesses within the CID, and to the broader regional users of this cultural anchor community.
- Removal of direct service to the Stadium Station for the Rainier Valley, Tukwila, SeaTac and Federal Way communities will likely increase the load on the CID station for transfers and pedestrian traffic, especially during Stadium events.
- Evaluation of surge traffic impacts in the CID and on BIPOC communities is missing.
- **Land Use and Transit Oriented Development (TOD):** Potential for new development and TOD to advance gentrification has not been addressed. Need clearer comparison between type of land uses impacted by each alternative to adequately to compare alternatives. For example, in the West Seattle segments: need to demonstrate the project is consistent with the West Seattle Triangle Urban Design Framework, North Delridge Action Plan and the City of Seattle Comprehensive Plan goals and policies.
- **Parking:** Impacts to parking have not been adequately evaluated throughout the corridor, including analysis of hide and ride parking near stations, construction worker parking needs and impact to disabled parking. Inventory of commercial loading zones is not correct. Impacts to commercial load zones near stations not evaluated or mitigated.
- **Visual Quality and Aesthetics:** Visual quality and aesthetic impacts have not been fully evaluated. Missing analyses and visuals include:
 - Specific public views of natural and human made features along SEPA corridors and of historic landmarks.
 - System elements including guideways, stations, portals, straddle bents, noise walls, overhead pole (OCS), and Traction Power Substation (TPSS) numbers and locations.
 - Additional Key Observation Points (KOPs)
 - Visuals in respect to light, glare, height, bulk and scale and shading.
 - Evaluation of visual impacts from exhaust stacks and entry portals adjacent to historic landmarks and those within historic districts need to be evaluated.
- **Cultural and Historic Resources:** The Area of Potential Effects (APE) should be expanded to include detour routes through Pioneer Square. An evaluation of impacts to buildings and areaways in Pioneers Square should be added. Missing information and analysis of the CID and Pioneer Square in the context of a larger historic district should be completed. The list of properties potentially eligible for Landmarks designation, in addition to those potentially eligible for listing on the National Register of Historic Place (NRHP) is missing. See *Attachment H* for additional discussion of cultural and historic resources.

2. Examples of Methodology Disagreements:

- **Transportation:**
 - Boarding numbers need updating, especially for peak hour travel
 - Bicycle facilities analysis does not meet FTA best standards ‘access to transit’ of 3-mile radius from station (ST used 1.5-mile bike shed)
 - Missing pedestrian LOS data, which may have changed since DEIS analysis.
 - Traffic modeling. Sound Transit utilized Synchro and the City understands that further analysis with Vissim may be warranted between DEIS and FEIS. The City would appreciate review of this modeling work with the project team.

- Provide signal phasing assumptions, these have changed since the DEIS was written and model assumptions need to be updated.
- Speed limits have changed since the DEIS was written and model assumptions need updating.
- **Design/Safety:** Include Seattle Fault and earthquake parameters in design. Standards are changing and the FEIS should use most current standards. For Smith Cove/W. Galer Street Station, all alternatives pass through areas that a NOAA model predicts could be inundated by a Seattle Fault generated tsunami. The preferred alignment is exposed to tsunami inundation at W Republican St/5th Ave W. Please consider this in further design of these alternatives.
- **Visual Quality:** The DEIS does not use current FHWA 2015 Visual Quality Analysis Guidelines. Please use the most recent guidelines.
- **Air Quality:** Per Puget Sound Clean Air Agency's report on toxics in the CID, the neighborhood has among the poorest air quality in Seattle. Please incorporate PSCAA's findings in your analysis and evaluate the impact of construction vehicles for the project and their contribution to cumulative air quality impacts.

Next Steps. In addition to written responses to the City's formal comments in *Attachment A: City Consolidated Comments*, the City would like to work with Sound Transit through development of the FEIS to update or complete analyses requested by the City and provide technical assistance, information, and evaluations upon request.

Attachment E: Transportation Impacts

There are many instances in which the DEIS does not sufficiently disclose and analyze construction and operational impacts to the transportation system. Additional work is needed to understand the scope of these impacts to inform appropriate mitigation measures, action on a Project to be Built, and eventual project permitting.

The following text highlights major City concerns related to construction and permanent transportation impacts. A comprehensive inventory of these issues may be found in the City's formal DEIS comments in *Attachment A: City Consolidated Comments*.

Construction Impacts. The City notes several concerns related to construction impacts, including:

- **Road Closures During Construction.** Statements in the DEIS that full or partial closures to arterials will create more congestion do not adequately identify the true impacts on the traveling public. Several of the full and partial closures will require reduced vehicle trips, compelling the public to change behavior during the construction period. SDOT operations staff will need to actively manage construction impacts throughout construction of the project. Mitigation of impacts on bus operations due to street closures is not adequately described and should be closely coordinated with the City and King Country Metro. The insufficient capture of construction impacts impedes the understanding of whether mitigation measures will adequately address impacts, which in turn, limits evaluation of alternatives when construction impacts are an important factor.
- **Streetcar impacts.**
 - The DEIS assumes that the Center City Connector will be complete by the time WSBLE work begins in 2027 in the Downtown segment. As of April 2022, construction of C3 has not yet started and should not be assumed to be complete before WSBLE work begins in the Downtown segment in 2027. The FEIS should revise assumptions to account for C3 construction that could be concurrent with WSBLE. The FEIS should describe the impacts and propose mitigation for C3 construction, startup, and testing activities as well as the operation of the streetcar system as expanded by the C3 project.
 - The DEIS notes varying degrees of impacts to the streetcar under nearly all Downtown and CID alternatives yet will still be able to operate, though not as a connected streetcar system. This significantly understates the true impact of the WSBLE construction to the operations of the system. The streetcar cannot be easily rerouted or curtailed without major capital work and associated environmental documentation. This might include installation of temporary tracks, turnbacks, and switches, to maintain access to the fleet and maintenance facilities at Charles Street (FHS) and 318 Fairview (SLU) and provide for safety during such operations. The DEIS does not detail necessary modifications to the streetcar system to provide for continued, if disconnected, service.
- **Emergency services.** Construction impacts will have impacts to emergency transportation services. Insufficiently identifying construction impacts the ability to evaluate how construction will impact emergency transportation services.

Permanent Operational Right-of-Way (ROW) Modifications. The City notes several concerns related to permanent operational modifications to ROW, including:

- The project assumes that several transit lanes downtown will be converted to general-purpose travel lanes. This assumption is not consistent with current City vision and goals.
- Further evaluation of center column placements along Elliott/15th and 14th Ave should be performed to ensure that there are adequate sightlines and access can be maintained.
- Further evaluation is needed for SODO busway and SODO Trail closure to better identify impacts and determine appropriate mitigation with partners.

Removal of Commercial and ADA Load Zones. The DEIS does not fully detail impacts and mitigation for loss of parking and loading/ADA access in certain areas (CID 5th Ave and near Seattle Center). The DEIS acknowledges that commercial loading and ADA spaces would be displaced and relocated, which may not allow them to serve the business/residents needing those zones. The DEIS does not provide sufficient detail to evaluate and mitigate these impacts.

Access and Integration. The City notes several concerns related to access and integration, including:

- Pedestrian/bike access:
 - Information regarding improvements necessary to ensure adequate sidewalk space immediately adjacent to station entrances is missing or incomplete.
 - Station entrances should be located to improve pedestrian/bicycle/ADA station access, bus integration, equitable transit-oriented development, and station visibility/legibility. For example, for alternatives WSJ-3a, WSJ-4, and WSJ-5, consider an additional entrance on the west side of 41st Avenue SW to provide access closer to the California Avenue SW commercial corridor.
 - The walk and bikeshed analysis should be expanded upon, in terms of the number of miles for anticipated ridership and improvements using FTA standards, to identify how the customers will safely access the station by walking and biking and where facilities need to be added, upgraded, or maintained.
 - The number of secured bike parking spaces should be reanalyzed, and more work is needed to determine additional areas at each station to ensure all bikes fit and are accessible in the bike parking areas.
- Transit pathways. Many of the Delridge Station alternatives would require bus service to deviate from Delridge Way. These new bus movements would affect operations on Delridge Way (raising questions about signals, markings, and/or lane priority for transit) and on nearby non-arterial streets (pavement, ped/bike/bus interaction, noise). The associated impacts and mitigations must be identified in the DEIS and implemented during construction.
- Pick-up/Drop-off. The DEIS does not detail the methodology for determining bus pick up/drop off demand and indicates different assumptions at different stations; this is particularly troubling where curb space may be limited or unavailable. For example, the DEIS indicates that the Westlake Station would have 40% higher ridership, including passengers being dropped off, but no pickup/drop off areas are included.

Next Steps. In addition to responding to the City's formal DEIS comments in *Attachment A: City Consolidated Comments*, the City would like to partner with Sound Transit on the following actions:

- Work with SDOT Divisions, including Transportation Operations, Street Use, and Transit and Mobility, to fully identify the range of construction impacts and develop a construction management plan that anticipates schedule and phasing, needed traffic reroutes and deviations, and appropriate transportation demand management strategies during the construction period.
- Address the numerous concerns raised by the Seattle Streetcar team through additional analysis of impacts and development of a mitigation plan. Mitigation analysis for the streetcar system should include:
 - Capital facilities to allow continued operations Center City Connector and South Lake Union streetcar systems, and for First Hill service to continue to 5th and Occidental, including continued access to maintenance facilities for all lines to enable operations;
 - Analysis of limited duration shut-downs sufficient to build the capital improvements necessary to maintain safe operations of a connected streetcar system during WSBL construction;
 - Phasing of construction impacts to avoid concurrent closures of both FHS and SLU lines and full closure of the entire streetcar system when C3 is operational; and
 - Financial mitigation for any closures to support operations and address ongoing costs during closures.
- Commit to improving station access and transit integration in the next phase of station planning before the FEIS. Ensure that the FEIS includes these updated station designs. See Attachment L: Planning for Station Access and Transit Integration for longer discussion and next steps for station planning.

Attachment F: City Assets and Properties

The WSBLE project may impact many assets and properties that the City owns and/or maintains. Many impacts will require acquisition in fee or by easement, utility relocation, right-of-way use through street use permitting, or other legal conveyance—all processes that take substantial time, and in many cases City Council action. The DEIS does not fully document potential impacts to City assets and properties, making it difficult to understand completely the trade-offs between project alternatives and identify appropriate mitigation actions.

The City owns and/or maintains infrastructure and parceled properties—including the Seattle Center, several parks, two public golf courses and greenbelts, a Seattle Parks and Recreation (SPR) maintenance facility, utility infrastructure, street right-of-way, bridges, buildings, and vacant property—that may be impacted by WSBLE. The following describes the major concerns with evaluation of impacts to and mitigation for City assets and properties. A comprehensive inventory of these issues may be found in the City's formal DEIS comments in *Attachment A: City Consolidated Comments*.

- 1. Property Acquisition.** During our review we found the *Acquisitions, Displacements and Relocation* chapter, and *Appendix L.4.1* is missing information and analysis. This made it difficult for staff to fully evaluate project impacts to City assets, costs for easements, acquisition, or construction use of these properties, and identification of appropriate mitigation measures that would be appropriate. Because the process for acquiring properties and property rights varies by City Department, and all transactions require City Council approval, it is important for City staff to begin these processes as soon as possible to avoid project delays. To complete this analysis the City needs the following:
 - List of all impacted City assets.
 - Clear identification of construction easements and staging areas related to City property and a distinction between full and partial acquisitions.
 - List of proposed permanent rights-of-way needed to complete the project.
 - Summary of contamination that may occur to City assets or adjacent properties.
- 2. Utilities.** We found the *Utilities Chapter* included several incorrect assumptions. In addition, along with *Appendix J – Conceptual Plans* we found the chapter missing information and/or analysis to clearly identify utility impacts. Likewise, mitigation was missing or inadequate. For example:
 - The DEIS states that ‘Through pre-construction measures and coordination with utility providers, no impacts on major utilities are expected during construction and no mitigation would be needed.’ We strongly disagree and given all the impacts described in the same DEIS, question the basis for this assumption.
 - The DEIS states that guideways are non-pollution-generating surfaces. This is false; the Washington State Department of Ecology has judged guideways to be pollution-generating surfaces. Unless Ecology revises that determination pending new data, the project must meet the City’s Stormwater regulations to be permitted; the current design does not.
 - The DEIS describes relocations for ‘major’ utilities, while relocations of ‘minor’ utilities, which will be extensive, were not evaluated. Waiting until final design for this evaluation limits an accurate comparison of alternatives in cases where many ‘minor’ are in proximity

to the project. In addition, the study area of 100 feet on each side of the alignment does not address potential indirect impacts to utilities outside the corridor.

- Known alignment conflicts with overhead and underground electrical utilities have not been fully evaluated for impacts to the project.
- There are several transmission lines in the project corridor. Transmission outages are generally not allowed and take up to one year to schedule in advance. Sound Transit should evaluate the process and timeline for transmission outages.
- SCL could not verify the number of major utility conflicts with the conceptual drawings in *Appendix J* and those in the *Utilities* chapter due to omissions and inconsistencies.

3. **Right-of-Way Use and Improvements.** The DEIS presents little information on and no analysis of changes in roadway channelization, partial or full Right-of-Way (ROW) needs. To evaluate the impacts to City ROW, additional analysis and information is needed, including:

- Multi-year street closures have impacts to alternative pathway streets and to the system that are not accurately depicted in the DEIS. This needs to be evaluated to determine whether these roadways can accommodate detoured or diverted traffic.
- More complete list of utility relocations and 'construction limits.'
- Proposed changes/relocations of pedestrian/bike facilities and connections at stations
- Impacts on existing trees in ROW under SDOT jurisdiction and required 2:1 replacement
- The information necessary to identify impacts to pedestrians and bicyclists accessing the stations. Improvements necessary for safe bicyclist and pedestrian access should be included as part of the WSLBE project. (See also similar comment directed at all stations.)
- Impacts to SDOT structures particularly bridges have not been assessed.
- Right-of-way changes associated with channelization, signalization, sidewalk/ADA improvements for operation of WSLBE have not been assessed in the DEIS. Also, right-of-way changes associated with detours and traffic diversion have not been evaluated.

4. **Streetcar.** The DEIS assumes that the Center City Connector (C3) Streetcar will be complete at the time of WSLBE construction. If correct, construction road closures for either alternative would require track and signal modifications to re-route the streetcar for continued service. The proposed mitigation to develop an operational plan to minimize impacts to streetcar service would be inadequate. The DEIS should also evaluate cumulative impacts to the streetcar and downtown transportation network if C3 and WSLBE construction overlap. See *Appendix A* for additional comments related to C3 streetcar, as well as SLU and First Hill streetcar networks.

Next steps. The City will assemble a City Asset Team of real property services with representation from each affected City department. The City requests that Sound Transit works with this team to:

- Develop a plan for mitigation to City assets, including the acquisition and sale of property rights related to City assets property acquisition where appropriate.
- Identify contamination on and near City assets that might affect City assets during construction.
- Provide requested additional studies and information for impacts to City assets and properties, including the Streetcar network. The City team will help identify additional impacts and design improvements or avoid or mitigate impacts.
- Update drainage design to meet current City stormwater regulations.

Summary table of impacts to City assets and properties. The following summary table compiles impacted City assets and properties, based on City staff understanding of the DEIS. This list may not be exhaustive.

| DEPT | ASSET | EXAMPLES/IMPACT |
|---------------|--|---|
| SDOT | Structures | West Seattle Bridge, 4 th Ave S Bridge, 5 th Ave S, Seattle Blvd, Jackson St, bridges in proximity to alignments (Dravus Street Bridge, Magnolia Bridge, Gayler St Flyover, 15 th Ave/Nickerson Exchange), areaways (C/ID, Pioneer Square, Downtown, Belltown) |
| | Bike/Ped facilities | Ship Canal Trail, SODO Trail, others? |
| | Street Ends | Impacts to 22 nd Ave SW Street-end, 14 th Ave NW Street End/Boat Ramp |
| | Streetcars | SLU, First Hill and possibly Center City streetcars operations. Long-term closures will result in revenue loss. |
| | Right-of-way condition | The overall condition and need for roadway improvements to accommodate bus traffic near stations has not been evaluated. |
| | Curb ramps, sidewalks | The inventory of sidewalk conditions within the station walkshed is incomplete and should be completed. |
| | Areaways | Need identification, possible surveying for roadway detours through Pioneer Square and CID |
| | Streets | Where additional/new bus service required for transit integration; Construction detours and road closures, street vacations, signal and turning movement changes; Downtown transit channelization (proposed removal/relocation of bus-only lanes and bicycle facilities). |
| FAS | Animal Shelter | Several alternatives would displace the Seattle Animal Shelter, a critical City function. Relocation will require ample time and funding for community engagement, site acquisition, design, and construction. |
| | Downtown: City Hall, SMT, Justice Center | Construction closures related to the Midtown Station and surrounding line could limit access to one or all of these critical civic facilities. |
| OEM | EOC: Emergency Operations Center | CID tunnels are all adjacent to EOC will have noise and vibration impacts; Access limited during construction. All alternatives will impact the EOC. |
| SFD (and FAS) | Stations 3, 10, 32, 3, 20, 18 | Potential impact on response time. Guideways could impact access to FS 18. Temporary relocations may be needed, which are very costly and can take years to site and equip. |
| | Stations 14, 20 & 36 | Temporary relocations will most likely be necessary, such relocations are very costly and can take years to site and equip. Noise and vibrations would affect active personnel. They are 24-hour stations. |
| | Station 3 | Closure of waterway impact ability to respond |
| SPD | Harbor Patrol Unit | Closure of waterway impact ability to respond |
| | SPD Park 95 | Lander St closure would affect response units and time |

| DEPT | ASSET | EXAMPLES/IMPACT |
|----------------|--|---|
| | N, W, S, and SW Precincts | Downtown closures would affect response units and time |
| SPU | SODO Station, Holgate and Lander | 60" Royal Brougham sewer cannot be relocated or a siphon or pump station built. If it must be temporarily cut during construction, the function must be retained by a temporary pipe, and the permanent pipe must be in the same place. SPU would prefer if it could be protected in place. |
| | 14th Ave NW Outfall | Complex permitting and construction if need to relocate |
| | Ship Canal Water Quality Project | The "envelope" around the CSO storage tunnel that must be avoided, per SPU provided drawings. Tunnel must be protected during construction. |
| | Genesee Dam | Genesee Dam may not be stable during construction |
| | Westlake/Denny – historic sewer | Condition unknown |
| | Interbay Landfill | Methane, may impact liners |
| SCL | Substation site | Acquisitions – relocate Interbay substation site |
| | South Service Center | |
| | Impacted properties | 400 South Spokane St. (Parcel # 7666205660); 3222 17 th Avenue (Parcel #2770602605); 3243 SW Genesee St. (Parcel #9297301810); 4402 35 th Ave. SW (Parcel #9297301815); No address (Parcel #9297301805) |
| | Transmission, Distribution, Network Facilities | Utility relocations, actual area unknown, will be fully defined as design proceeds |
| | Service Disruptions | Electric utilities/substation and transmission service disruptions needs analysis. Need to evaluate impacts to SCL South Service Center. |
| SPR | 23 SPR properties | Loss of habitat and greenbelts, including Queen Anne Greenbelt, West Duwamish Greenbelt. Loss of recreational function: West Seattle Golf Course, Kinneer Park, Interbay Golf Course, Interbay Playfield, and 22nd W. Street End Park. Loss of partial or complete use of SPR Central West maintenance facility on West Howe Street. |
| SPL | Downtown Library | Access limited during construction; Loading Dock blocked, which will block distribution to other libraries |
| Seattle Center | Numerous historic resources, open space, utilities, and public ROW | Numerous construction and permanent impacts including tenant relocations and displacements, road closures, noise and vibration impacts, tree removal, pedestrian access, utility relocation, and impacts to historic resources. See <i>Attachments A</i> and <i>K</i> for more detailed comments regarding impacts to Seattle Center. |

Attachment G: Section 4(f), Parks & Recreation, Historic Properties

The Section 4(f) analysis performed by Sound Transit lacks necessary specificity and detail on the scope, duration, and mitigation of impacts to parks and park facilities, certain historic resources, and Seattle Center for any of the alternatives. Seattle Parks and Recreation (SPR) and Seattle Center cannot concur as to whether project impacts are *de minimis* under Section 4(f) without this additional analysis, including adequate demonstration of completed planning to minimize harm to SPR properties and Seattle Center.

The following list provides representative examples of places where additional information and details related to Section 4(f) impacts and mitigation, including impacts to parks, recreation areas, and historic resources, are needed. A comprehensive inventory of these issues may be found in the City's formal DEIS comments in *Attachment A: City Consolidated Comments*.

1. **Parks, recreation areas, and greenbelts.** Need additional analysis of the scope, duration, and mitigation for impacts to 28 SPR facilities and natural areas including Kinneer Park, Interbay Playfield, Delridge Community Center, and West Duwamish Greenbelt. For example, potential impacts to Kinneer Park and its recreational uses should be disclosed and mitigated.
2. **Golf courses.** Need additional analysis and mitigation of the impacts to playability, configuration, operations, and resultant revenue, at West Seattle Golf Course and Interbay Golf Course. For example, the tunnel portal alternatives on the south side of South Genesee Street would have significant impacts on golf course playability, operations, and revenue.
3. **Seattle Center.** Need additional analysis and mitigation of adverse impacts from the temporary closure of 1.5 acres of the Seattle Center campus during construction, including provisions for equitable and ADA access to campus; analysis to support the conclusion that Seattle Center tenants will be able to continue normal operations during construction; analysis and mitigation of permanent adverse impacts, such as displacement of Donnelly Gardens and Legacy London Place trees; and analysis and mitigation of potential permanent adverse impacts to historic facilities including the Northwest Rooms and the Cornish Playhouse. See *Attachment K* for more detailed discussion of comments related to Seattle Center.
4. **Additional historic resources.** In addition to impacts to Seattle Center historic resources referenced above, more information is needed regarding impacts on the International Special Review District/Chinatown NR District, as well as impacts to Union Station. See *Attachment H* for more detailed discussion of comments related Section 106 and historic resources.

Next Steps. The City requests work sessions with Sound Transit related *de minimis* concurrence. If we are unable to achieve agreement on concurrence on *de minimis* findings, we will request additional least harm analysis during development of the FEIS, including a more detailed mitigation discussion, negotiation, or determination based on selection of a Preferred Alternative. For 4(f) properties with adverse impacts, the City requests a 4(f) and least harm analysis. The City requests that Sound Transit provide written responses to City comments including detailed information as requested in City Section 4(f) comments in *Attachment A*.

Attachment H: Historic and Archaeological Resources/Section 106

The DEIS does not sufficiently assess the construction and permanent visual, physical, and operational impacts of the WSBLE project on historic resources. A thorough understanding and analysis of these impacts (effects) is necessary to meaningfully compare alternatives, inform a decision on a Preferred Alternative, and avoid costly conflicts and limited mitigation opportunities. Successful Section 106 consultation depends on the City having this information to evaluate impacts and trade-offs.

As noted in *Attachment C: Compliance*, the DEIS demonstrates several instances where compliance with Seattle Municipal Code sections related to implementation of the City's Historic Preservation regulations are not identified. Specifically, the references to when a Certificate of Approval (SMC 25.12 and SMC 23.66) is required for alterations within historic districts (demolition, construction of stations, venting structures, head houses etc.) or to individual landmarks.

The DEIS does not adequately address regulations regarding referral to the Landmarks Preservation Board of nominations for potentially eligible resources that are proposed for demolition or substantial alteration (SMC 25.05.675H2c and SMC 25.12). Without this information, the potential conflict with local controls and policies cannot be determined. These issues should be resolved and documented in the FEIS to avoid potential cost and delay in the project permitting process.

Related to both local and federal regulatory compliance, the DEIS does not adequately assess or describe the impacts to historic resources. Several specific examples that are of concern are the visual impacts to Union Station caused by vent stacks, the construction impacts to areaways regarding haul and detour routes, and the construction and operational impacts to Seattle Center under DT-1 Seattle Center station alternative at Republican Street. Additionally, the DEIS does not define, identify, or address impacts to traditional cultural properties (TCPs).

The City is a Consulting Party under Section 106 of the National Historic Preservation Act (NHPA). In this role, we will work towards concurrence on the area of potential effect (APE), identify historic and archaeological resources within the City that are adversely affected and work with Sound Transit and FTA to develop a Memorandum of Understanding if appropriate. The City has not yet concurred on the project APE. We understand that the APE can change throughout the process as the project evolves. However, it is important that the APE capture all areas that will be impacted both permanently and during construction. We have specific concerns regarding the APE in the CID, Pioneer Square, and Seattle Center.

Next steps. A comprehensive inventory of these issues may be found in the City's formal DEIS comments in *Attachment A: City Consolidated Comments*. In addition to written response to those comments, the City seeks the following:

- Continued meetings of consulting parties with Sound Transit and the FTA to discuss and seek agreement on Section 106 matters.

- Clarity in the FEIS for analysis of proposed physical alterations and the resulting impacts (effects) on historic resources. This includes existing city landmarks and historic district, potentially locally eligible resources, and properties that are National Register listed or determined eligible. The FEIS must identify actions that will require a Certificate of Approval.
- Identification of actions that will require a landmark nomination must be submitted to the Landmarks Preservation Board per SMC 25.12 and SMC 25.05.675H2C.
- Identification of TCPs and analysis of impacts to those resources should be included in the FEIS.
- Analysis of impacts to areaways, particularly within Pioneer Square. Areways have been evaluated during previous public projects, but those are not referenced in the DEIS.
- FEIS must clearly provide analysis of impacts (effects) to historic resources along haul and detour routes.
- FEIS must clearly provide analysis of visual, construction and operational impacts (effects) to Seattle Center. Specifically, construction feasibility studies for the Northwest Rooms and Cornish Playhouse to address some of the proposed alterations or nearby construction will be needed. See *Attachment K* for additional information on Seattle Center.
- Specific mitigation options relating to specific impacts to historic resources. It appears that the menu of mitigation options suggested in the DEIS is general rather than specific.

Attachment I: Business and Residential Displacement

The DEIS Preferred Alternative will acquire up to 516 parcels and displace up to 332 business, 3,000 employees and 1,002 residences throughout the project corridor. Other alternatives have similar impacts. These displacements will have significant impacts on the economic and social vitality of the City, during and after construction of the project. The impacts will be unique across different communities but will be felt hardest by BIPOC and low-income communities. The DEIS does not sufficiently examine the full range of impacts to businesses and residents, including loss of community cultural identity and cohesion resulting from displacements and changes in land use. Expanded evaluation is necessary to fully inform strategies to avoid, minimize, and mitigate these project impacts.

Following are the City's most notable comments on business and residential displacements. A comprehensive inventory of these issues may be found in the City's formal DEIS comments in *Attachment A: City Consolidated Comments*.

Business and Employee Impacts. The City finds many instances where additional analysis and mitigation is needed to fully assess project impacts on businesses and employees, including:

- Business and employee displacement and relocations—in particular, minority-owned businesses and employees—have not been fully evaluated throughout the corridor.
- Demographics of impacted business owners and employees is unknown and should be evaluated in the Environmental Justice Chapter. The DEIS should evaluate impacts on affected industry sectors that employ large percentages of BIPOC and/or low-income persons.
- Temporary revenue and job loss for businesses and employees during construction is significant and should be more fully addressed.
- While direct impacts are evaluated in the DEIS (number of parcels and businesses), missing are analyses of indirect and cumulative impacts from business displacement.
- The DEIS states that some affected properties such as assistive living and supportive housing and public facilities may be difficult to relocate and require construction of new facilities.
- Water-dependent facilities may not be able to be re-located. A full economic analysis is needed to determine potential mitigation measures and costs associated with each alternative.
- Additional information is needed to understand indirect and cumulative impacts of land use changes especially to industrial lands.
- The DEIS does not evaluate impacts from COVID-19 on businesses and potential recovery.
- An evaluation of the displacement of City facilities and operations is missing or incomplete. Also missing is appropriate mitigation for City facilities and operations (Seattle Animal Shelter, Fire Stations, SCL Substation, Seattle Center, replacement of use of parks property and Seattle Streetcar lines, utility easements).

Residential Impacts. The City finds many instances where additional analysis and mitigation is needed to fully assess project impacts on residential displacement, including:

- Impacts from displacement of residential property owners and renters, including low-income and BIPOC communities, have not been fully evaluated throughout the corridor.
- While direct impacts are included in the DEIS (# of parcels and residential units), missing are analyses of indirect and cumulative impacts from displacement.
- The impact of building acquisitions that could displace Mandatory Housing Affordability (MHA) units needs to be completed.
- Impacts to affected parcels that currently have rent- and income-restricted housing through Seattle’s Office of Housing’s affordable housing portfolio, other affordable programs, and the Multifamily Tax Exemption Program cannot be addressed because the information for this assessment is missing. Information for rent- and income-restricted housing managed by Seattle Housing Authority is also missing and cannot be addressed.
- Need to update mitigation measures to ensure construction of the project would comply with federal and local regulations regarding relocation. City of Seattle regulations include Tenant Relocation Assistance Ordinance (22.210) as does the State Relocation Assistance Act (Revised Code of Washington or RCW 8.26).

Safety. Residential and commercial units left vacant prior to demolition or during construction due to displacement may create safety hazards and be vulnerable to illegal activity. These safety concerns and potential for increased crime has not been discussed or evaluated in the DEIS. The FEIS should consider potential mitigation options, including strategies to monitor vacant sites and prevent crime, and identifying agencies or groups responsible for implementation. Sound Transit should work with existing community organizations and partnerships, such West Seattle Junction area’s Business Block Watch (in collaboration with the Seattle PD’s SW Precinct) to develop appropriate strategies.

Land Use. Additional information is needed to understand the land use impacts during construction such as access closures, loud construction noises, and movement of heavy construction vehicles on the viability of adjacent and nearby land uses in particular street level retail and civic and open space uses that are closely linked to access by pedestrians to visits for leisure. In the C/ID construction would impact and possibly disrupt a concentration of community-oriented civic uses.

Next steps. In addition to responding to the City’s formal DEIS comments in *Attachment A: City’s Consolidated Comments*, the City would like to partner with Sound Transit on the following actions:

- Develop a broader community development strategy with community, Sound Transit, and other partners for the Chinatown-International District that goes beyond project mitigation to address cumulative impacts and historic harm. See *Attachment B* for additional information.
- Work with affected businesses and residents to understand, minimize, and mitigate the impacts of displacement on community cohesion, encourage community safety and vitality through construction, and promote long-term opportunities for impacted businesses and community members to remain in community.

Attachment J: Mitigation

NEPA requires consideration of direct, indirect, and cumulative impacts of a project on the environment and development of potential measures to mitigate adverse environmental effects. Typically, a DEIS describes options for mitigation, while the FEIS includes the decisions on mitigation to be implemented. However, we found the DEIS to be lacking in consistent and clear mitigation for the potential adverse project impacts, many of which may be unmitigable. Without adequate proposed mitigation, it is not possible to understand the full impact of the project, differences in alternatives, and potential permitting concerns.

There are numerous areas in the DEIS where mitigation measures or strategies are absent or insufficient. Where the DEIS does propose mitigation measures, as in the Transportation chapter, they are not presented comprehensively, but scattered throughout. In Appendix G Environmental Justice, measures or strategies are not described, but only referenced in a table, for example in Table 5-2. The City believes that the level of mitigation in the DEIS is not acceptable for a project of this magnitude. The following are examples of our comments regarding mitigation. A comprehensive inventory of these issues may be found in the City's formal DEIS comments in *Attachment A: City Consolidated Comments*.

Business Displacements. The DEIS identifies significant business and employee displacements throughout every segment of the project, 332 businesses and 1,002 residences for the preferred alternative alone. Business displacements throughout the alignment are tremendous, and the DEIS proposes little mitigation. For additional details see *Attachment I: Business and Residential Displacements*.

- **Maritime businesses.** The most significant impacts are those to water-dependent facilities that may not be possible to relocate. Impacts to the maritime industry both in the Duwamish and Interbay segments are identified as unavoidable and significant impacts. This is not acceptable to the City. The FEIS should include an economic analysis to fully evaluate the impacts of losing these businesses and to determine potential mitigation measures and costs associated with each alternative.
- **Displacement of businesses and cultural anchors in Chinatown-International District.** The DEIS does not consider the relationship of displaced businesses to the community, particularly those that serve as cultural anchors in the CID. Their displacement would have ripple effects and impact the vitality of both the local CID community, but also the broader region for which the CID is a cultural hub with a regional draw. The DEIS does not propose sufficient mitigation of these location-sensitive businesses.

Residential Displacements. Mitigation for loss of low-income housing for Delridge alternatives discusses relocation. Missing however, is mitigation for: loss of neighborhood connectivity particularly from removal of housing units as guideways bisect residential streets, and potential adverse property impacts to housing left in the shadow of the guideway. For additional details see *Attachment I: Business and Residential Displacements*.

Transportation. Major transportation impacts from the project will occur during construction. While the DEIS describes where full or partial impacts to arterials will take place, it does not adequately identify detour routes or the adequacy of routes to accommodate increased traffic. These impacts will occur over several years – throughout the City. Mitigation including project phasing and coordination with the City and local transit providers will take a large effort. Development of a draft construction management plan should begin now and refined as part of the FEIS. For additional details see *Attachment E: Transportation Impacts*.

Streetcar. The streetcar cannot be easily rerouted or curtailed without major capital work and associated environmental documentation. This might include installation of temporary tracks, turnbacks, and switches, to maintain access to the fleet and maintenance facilities at Charles Street (FHS) and 318 Fairview (SLU) and provide for safety during such operations. The DEIS does not detail the modifications to the streetcar system that will be needed to provide for continued, if disconnected, service. Mitigation analysis for the streetcar system should include access to maintenance and operation activities for FHS OMF, and the operable components of the system. For additional details see *Attachment E: Transportation Impacts*.

City Property. Mitigation for direct and indirect impacts to city properties do not include adequate mitigation measures. Replacement of several city properties are missing in the DEIS. For example:

- Impacts to operations at Seattle Fire Stations 14 and 36 would require temporary or permanent relocation of the stations. This is not addressed in the DEIS.
- Acquisition and relocation of the Seattle Animal Shelter is not addressed in the DEIS.
- Relocation of Seattle Center organizations is mentioned, but analysis of suitable locations near/within Seattle Center is not addressed in the DEIS.

For additional details see *Attachment F: City Assets and Properties*.

Next steps. Constructing a light rail system through existing communities in a built-out city will necessarily cause impacts. Project decisions should be informed by impact and mitigation analyses that help community members and policymakers understand the degree to which those impacts can be avoided, minimized, or mitigated.

Between the DEIS and the FEIS, Sound Transit must work with community members, the City, and other stakeholders and partners to develop a comprehensive mitigation analysis and plan with sufficient detail to inform actions on a Project to be built and FTA Record of Decision, and to avoid future delays to project permitting. The mitigation plan should be co-developed with impacted communities, and should explore a wide range of mitigation tools and strategies, including but not limited to:

- Develop mitigation funding programs
- Utilize multi-faceted community stabilization tools
- Support community-driven, equitable transit-oriented development

The City staff are committed to developing a workplan with Sound Transit to partner in both these analyses and the engagement to inform them.

Attachment K: Seattle Center

For the Seattle Center station, the City is not only a project reviewer and regulator, but also the primary property owner and landlord to the many arts and cultural resident organizations that call the 74-acre campus home. The City has many concerns with the impacts associated with both alternatives, including: impacts to protected features, including legacy trees, historic assets, and public recreation space; temporary and permanent noise and vibration impacts to sensitive cultural venues including performance halls and recording studios; displacement affecting resident organizations and the long-term performance of the Seattle Center campus; impacts to historic assets including the Northwest Rooms, International Plaza, and Cornish Playhouse; and transportation and access impacts affecting events and operations for years. Without further analysis and a mitigation plan it is not possible to fully understand the trade-offs of these alternatives.

The City of Seattle owns and manages Seattle Center. The 74-acre campus is the top visitor destination in the region, with more than 14,000 events presented on the grounds in a typical year. Its origins as an arts and cultural hub for the region date back to 1927. Following its development as the site of the 1962 World's Fair, the campus was dedicated permanently as a City asset, intended to serve as a place for the public to continue to gather and to find common ground by sharing inspiring experiences. Today, the campus is home to several dozen arts, cultural, educational, and recreational organizations – all of which find value in the community created by their proximity to one another. Seattle Center is home to dozens of public artworks and numerous protected historic buildings and sites. Many of the annual programs are free or low-cost. Seattle Center is also a hub where critical services are provided to vulnerable populations as needed.

This central location for recreation, entertainment, and respite is in the heart of Seattle, adjacent to some of the city's densest urban centers. When Seattle Center's master plan was last updated in 2008 – a process that involved years of extensive community engagement and feedback – the consensus supported multi-modal transportation, especially public transit. A light rail station serving Seattle Center is badly needed, and once completed, it will have a transformational effect on the campus and the communities it serves. Planning for this major infrastructure project on the public campus deserves careful consideration to bring about a successful outcome for both the light rail expansion and this unique, historic public facility.

The Seattle Center Department has reviewed the DEIS and the Draft Section 4(f) Evaluation (Attachment H) and finds the proposed DEIS Preferred Alternative (DT-1), to be inconsistent with other fundamental principles of the Master Plan, including the importance of maintaining and expanding open space in the heart of the campus, and ensuring that all capital investments support fulfillment of Seattle Center's mission. In addition, Seattle Center has found that the long-term impacts to its property, its business, and its tenants from construction have not been adequately evaluated. Where impacts are clear, mitigation has not been fully vetted. Seattle Center believes that prudent and feasible alternatives are

possible, and that a station serving the campus can be built with fewer impacts than would result from the proposed Preferred Alternative. For these reasons, the City of Seattle encourages the Sound Transit Board to authorize further study of refinement options in collaboration with the City between now and the publication of the FEIS.

Below are examples of where additional information and details are needed for the FEIS in its analysis related to Seattle Center. See *Attachment A* for the complete comments from the City.

1. Transportation

- Multi-year closures of Republican St. (DT-1 Seattle Center), Mercer St. (DT-2 Seattle Center) and Harrison St. (DT-1 SLU) will cause significant impacts to access for Seattle Center and its resident organizations. The DEIS misses the severity of the impacts, and the proposed mitigation is insufficient and inadequate.
- The FEIS should include a visual analysis of pedestrian surges in the pre- and post-even peak travel periods for large events at Climate Pledge Arena, and major festivals at Seattle Center. The visualization is needed to identify the impacts to campus spaces and/or nearby pedestrian infrastructure.

2. Acquisitions, Displacements, and Relocations

- The proposed acquisition of a part of the parcel where Seattle Rep is built (DT-1) will permanently displace campus open space, and spill-out activity around the new station entrance will dramatically limit the many operational and event uses of the Theater Commons at Seattle Center. The DEIS underestimates the severity of the impacts to campus events and operations. It lacks adequate mitigation or a convincing vision for how this station entrance will successfully integrate into the busy campus.
- The DEIS fails to acknowledge or propose mitigation for permanent impact to operation of the Seattle Repertory Theater building from the east entrance of the DT-1 Seattle Center station. Impacts include loss of visibility and access to the lobby and rotunda, and noise from the adjacent station entrance, vents, and other back of house equipment.
- The DEIS fails to acknowledge the severity of long-term temporary displacement of two important campus entrances, access for operations vehicles, access for school buses, artist loading, and other event related needs for Seattle Center and its tenants during construction. The construction footprint will also displace ADA and pedestrian access; loading functions for Seattle Rep, Cornish Playhouse, The Vera Project, and KEXP; ADA parking stalls at 2nd Ave N. and Mercer St. that serve patrons of the theater district; and the Seattle Rep theater main entrance.

3. Economics

- The DEIS fails to acknowledge business impacts throughout the construction period due to reduced attendance at events including campus festivals, public programs, and programs produced by Seattle Center tenants.
- Seattle Center will lose parking revenues throughout the construction period due to road closures on Mercer and Harrison St. Parking revenues are a critical source of operating income for the department.
- The construction footprint of DT-1 will cause operational challenges for organizations who rely on access to Republican, Warren, and 1st Ave N., disrupting their ability to conduct business.
- The construction footprint of DT-2 will cause operational challenges for organizations whose operations and patrons rely on access to Mercer St. Potential permanent business displacement

if an organization is no longer able to conduct its business on site due to operational ground-borne noise/vibration impacts DT-1 and DT-2 Seattle Center)

- The DEIS suggests temporary relocation as a mitigation for arts and cultural organizations at Seattle Center who are impacted by construction, including Seattle Rep, Cornish College of the Arts, SIFF, Vera Project, and KEXP. These organizations' ability to do business relies on highly specialized facilities which may not be available elsewhere in Seattle. The mitigation suggested is not thoroughly considered and is inadequate.

4. Noise and Vibration

- The DEIS analysis of construction-related noise and vibration is incomplete. Several sensitive facilities at Seattle Center are not identified. Some of the facilities identified have noise and/or vibration maximum thresholds that are lower than specified in the DEIS. The DEIS analysis fails to fully disclose the severity of construction impacts to Seattle Center and its tenants, and it is lacking adequate mitigation.
- The mitigation proposed in the DEIS may not be adequate to protect the very sensitive venues from operational noise and vibration. The FEIS should consider a higher level of mitigation such as floating slabs or thicker concrete under the tracks (DT-1) or high resilience fasteners (DT-2).

5. Parks and Recreation/Section 4(f)

- Seattle Center Department does not concur with the determination of "de minimis" impacts from the DT-1 Seattle Center Station alternative.
- The DEIS underestimates the severity of construction impacts to Seattle Center and its tenants and does not propose adequate mitigation for the long-term construction impacts to protected public recreational resources.
- The DEIS underestimates the severity of permanent impacts to Seattle Center and its tenants and does not propose adequate mitigation for the permanent displacement of protected public recreational resources.
- The DEIS does not provide adequate analysis to support the determination of "de minimis" impacts to historic public assets at Seattle Center. Further construction feasibility analysis and more detailed mitigation plans are needed for the FEIS.

6. Social Resources

- The DEIS underestimates the severity of construction impacts to Seattle Center and its tenants and does not propose adequate mitigation.
- The DEIS underestimates the severity of permanent impacts to Seattle Center and its tenants and does not propose adequate mitigation for the permanent displacement of campus recreational space and the programs and services produced by tenants.
- The DEIS analysis is misleading when it states that patrons of the DT-2 Seattle Center station alternative would need to cross a major roadway to access the campus. Patrons exiting south of Mercer Street could walk to Seattle Center on Warren Ave. N., which is a quiet street adjacent to the campus.

Next steps. The City and Sound Transit should codevelop a mutually acceptable outline for collaboration between the DEIS and FEIS on the further study of prudent and feasible avoidance alternatives for the Seattle Center station. The City of Seattle looks forward to working with Sound Transit in advance of the FEIS and over the next few years to inform the selection of a Preferred Alternative for the FEIS and complete Section 4(f) consultation.

Attachment L: Planning for Station Access and Transit Integration

WSBLE stations will create new neighborhood mobility patterns as people access new stations on foot, bicycles, and other transit modes. Siting and designing stations for safe non-motorized access and seamless bus-rail integration is necessary for passenger safety, user experience, and overall ridership, and an essential step toward the City's Vision Zero goals to end traffic fatalities and serious injuries. The DEIS analysis reveals that some alternatives do not optimize access and bus integration. If unaddressed in early project planning, there will be added costs and impacts—in time, dollars, ridership, and human safety—later to the project. It is imperative that in the next phase of station planning and preliminary engineering, Sound Transit, the City, King County Metro, and other agencies work with community to ensure that we design—and in some cases, *refine*—stations to include essential components for safe station access and seamless transit integration.

One of the purposes of the WSBLE project is to “Encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections consistent with Sound Transit’s *System Access Policy* (Sound Transit, 2013).” Below, we describe the importance of optimal station access and transit integration and point to examples of current Link stations that meet or fall short of these goals, and express concerns at some WSBLE station alternatives. While the station design in the DEIS is preliminary, the City believes the system could better meet the project purpose and need by improving station designs now to prioritize safe station access and seamless transit integration and to avoid later costs and impacts.

The ideal. Optimal station and entrance siting, along with coordinated bus-rail integration planning between transit agencies and local cities, makes the transit experience seamless to riders. Reducing the friction between connecting modes—not just transit modes like Link light rail, bus, and streetcar, but also walking and rolling—ensures that carbon-free transportation is the simple and easy choice for people travelling in and around Seattle today and into the future. In addition, accessible, organized, and signed pedestrian loading areas provide clear direction to motorists, including taxis, transportation network companies, and shuttles, of where to pick up or drop off passengers proximate to the station. In addition, broader station area design and planning maintains existing loading opportunities for neighborhood businesses and institutions. Link stations with successful access and integration include:

- U District Station. A new transit pathway with trolleywire was constructed along NE 43rd St adjacent to the south station entrance, along with safe protected bicycle facilities east to the UW campus and west to 11th Ave NE.
- Beacon Hill Station. The northbound bus stop is in plain sight directly in front of the station elevators and a neighborhood greenway runs a block away.

What to avoid. Alternatively, poor planning, missed opportunities, and awkward connections in transit integration create a negative transfer environment that can take decades to fix, if ever. Spacing modal connections too far apart or out of clear sightlines, requiring crossing of busy arterials, or leaving ambiguous or confusing transfer messages from the built environment make taking and changing vehicles on transit into a chore. Many riders will disdain these poor connections that they are forced to experience on every journey, or other riders after having been confused once will give up on using transit for that journey going forward. Examples of this sub-optimal access and integration include:

- Mount Baker Station. A separately planned transit center is across busy Rainier Avenue South and hidden by recent transit-oriented development from the main station plaza.
- University of Washington Station. While including some positive features such as a pedestrian bridge and recently added northbound transit-only lane, the station is inherently limited by its siting, surrounded by wide, heavily trafficked arterials, poor adjacent land uses such as landscaping and parking facilities, and long connections to bus bays.

WSBLE concerns. The DEIS review revealed several instances where the proposed station siting and design threatens to repeat these past mistakes. In these instances, unsafe or inconvenient access and integration may cause later costs and impacts—in time, dollars, ridership, and human safety—that should be avoided. The DEIS does not adequately evaluate the long-term impacts of poor station siting and design to the system or its users. Examples include:

- South Lake Union. The DT-1 South Lake Union Station at Harrison Street is perfectly oriented to interface with north/south bus service on Aurora and Dexter Avenues, east/west bus service on Harrison Street, and the general walk/bike network throughout South Lake Union. The DT-2 South Lake Union Station at Mercer Street, by contrast, is isolated from connecting modes.
- Delridge. Many of the Delridge Station options require bus service to deviate from Delridge Way. These new bus movements would affect operations on Delridge Way (raising questions about signals, markings, and/or lane priority for transit) and on nearby non-arterial streets (pavement, ped/bike/bus interaction, noise). The effects of these deviations must be identified in the station planning effort and implemented in parallel with station construction, not deferred to station opening.

Next steps. Additional comments on station access and transit integration related impacts may be found in *Attachment E: Transportation Impacts*. A comprehensive inventory of these issues may be found in the City's formal DEIS comments in *Attachment A: City Consolidated Comments*. In addition to written responses to these comments, the City seeks to work with Sound Transit, King County Metro, other agencies and partners, and community members to correct station design shortcomings for Preferred Alternative stations before the FEIS. This work should consider design modifications including, but not limited to, changes to station entrance siting and vertical circulation, and assumptions about the station context access and integration improvements. Design elements for safe access and integration should not be add-on access improvements later; they should be incorporated and delivered as essential components of the project. Correcting for these design flaws now will help avoid additional time and cost later.

Attachment M: Community Engagement

The City and Sound Transit have partnered on many engagement opportunities over the last several years to support WSBLE project planning and the DEIS process. City goals for engagement include supporting project decisions and outcomes that are centered in racial equity and that are co-created and truth-checked with community.

Engagement to date. On WSBLE project engagement, the City has offered clear advice on innovative ideas and lessons learned to deliver community engagement centered on racial equity. Sound Transit has embraced several of those practices including advancing a joint Racial Equity Toolkit, engaging with a trusted advocate model—the Department of Neighborhoods Community Liaisons program—and participating in the Jackson Hub work. In 2019 and 2020, Sound Transit conducted a series of workshops with community to advance planning efforts, and Sound Transit has reached out extensively to community to inform residents, businesses owners, and community-based organizations of its plans. In preparation for the DEIS, much of which took place during pandemic constraints on in-person meetings, Sound Transit developed a comprehensive online open house, stood up four geographic Community Advisory Groups with monthly livestreamed meetings to reach people at home, and developed a DEIS reader’s guide, trans-created into multiple language, to support community access to the DEIS analyses.

Opportunities to improve engagement. While these strategies and tactics have been important in supporting community involvement in the DEIS process, the City has heard a need from community for greater transparency, collaboration, and accountability in the engagement moving forward. The DEIS does not clearly demonstrate two-way engagement by showing what Sound Transit has heard from community, and critically, how Sound Transit will respond to that engagement through project decisions. A notable exception has been the quality, two-way engagement in forums with the resident organizations at Seattle Center. The City would like to partner with Sound Transit for similarly responsive engagement activities in other parts of the WSBLE corridor, especially the RET-priority communities of Chinatown-International District and Pioneer Square station, and the Delridge station area and transit corridor to the south.

DEIS comments. The City offers many comments relating to community engagement in *Attachment A: City Consolidated Comments*. Priority comments include:

- Appendix F1 lays out three engagement goals for the WSBLE project. The City requests that Sound Transit add a fourth goal to explicitly reflect engagement findings and demonstrate how community feedback will be incorporated in the development of the project. (Appendix F1)
- City requests that Sound Transit align values and guiding principles articulated both by community and in the Partnering Agreement with the City to build a process and engagement framework. Methods of engagement need to be aligned with and specific for each community’s needs. (Appendix F5.3)

Next steps. Sound Transit has committed to continuous improvement of its processes at all phases of the project to achieve its goals. This is a critical moment to reflect on lessons learned with the City and community, and to realign around community collaboration to support upcoming project milestones.

These next steps for the project—including the Board action on a Preferred Alternative, development of a mitigation plan and other analysis and issue resolution in advance of the FEIS, and exploration of refinements to the DEIS alternatives—must be carried out in partnership with community through sustained and robust two-way engagement. It is critical the engagement be transparent by sharing out what Sound Transit is hearing from community and stakeholders, as well as how the agency is applying engagement findings to project decisions.

To accomplish this, methods of engagement should be tailored for different communities; what will work for Downtown or Seattle Center might not work in Chinatown-International District or Delridge.

For the latter two communities, both prioritized in the RET, the City supports focused engagement efforts in the coming year. In Chinatown-International District, the City believes before an action on a Preferred Alternative there should be additional community process and analysis on how to avoid/minimize impacts, advance RET outcomes, and address historic harm. In Delridge, the City would like to see additional effort to engage the communities further south in the corridor who will access the Delridge station through critical bus-rail integration. See *Attachment B: Racial Equity Toolkit and Environmental Justice* for additional discussion.

The City offers resources and assistance, including Seattle Office of Civil Rights Relational Framework, Creative Placekeeping Framework developed for SPU, and SDOT's Transportation Equity Program, to support the engagement process. Community in the CID has developed the CID Community Advocacy Model as an engagement resource. The City looks forward to partnering in this engagement work, through both the FEIS development process and the update to the Racial Equity Toolkit.