

*April 18, 2022*

Subject: Seattle Planning Commissioner comments on the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement

The following comments were presented and agreed to at the Seattle Planning Commission's April 14, 2022 meeting. Of the fourteen Planning Commissioners, nine were present at this meeting. Three Commissioners recused themselves from the discussion as described below. The remaining six Commissioners voted to approve these comments. This does not represent a quorum of the Commission required to approve a letter. These comments will be presented at the April 28 2022 Planning Commission meeting for Commission approval.

**Disclosures/Recusals:**

Commissioner Rose Lew Tsai-Le Whitson disclosed that her employer, Jacobs Engineering, is part of the team producing the Environmental Impact Statement (EIS) for this project. She recused herself from the discussion.

Commissioner Alanna Peterson disclosed that her employer, Pacifica Law Group, does ongoing work for Sound Transit on land use and other issues. She recused herself from the discussion.

Commissioner Dhyana Quintanar disclosed that her employer, WSP, supports the West Seattle and Ballard Link Extensions project through a general engineering contract with Sound Transit. She recused herself from the discussion.

Seattle Planning Commissioners appreciate the opportunity to comment on Sound Transit's West Seattle and Ballard Link Extensions (WSBLE) Draft Environmental Impact Statement (DEIS). The Seattle Planning Commission is a 16-member independent, volunteer advisory body. We provide guidance and recommendations to the City of Seattle's Mayor and City Council, as well as City departments on planning goals, policies, and plans for the physical development of the City. The Planning Commission is very supportive of this project and offers the following comments and recommendations to create the best possible transit investment for the benefit of Seattle and the region. Thank you in advance for your attention to our perspectives. We look forward to the opportunity to continue to review and provide recommendations on this significant transit infrastructure and how it will serve the region's and Seattle's many communities.

**Introduction**

- Seattle Planning Commissioners strongly urge Sound Transit to evaluate the benefits and impacts of the WSBLE project through a lens that considers a hundred-year horizon, well beyond the short-term construction timeline for this project.
- The EIS should clearly identify how the many factors considered in the analysis will be weighed and balanced in the final selection of the preferred alternative.
- The EIS should clarify what thresholds were used to determine what was considered an impact to be raised in the analysis.
- Sound Transit and the City should continue to work together on issues that require ongoing interagency cooperation and coordination, including identification of a final preferred alternative,

appropriate and meaningful mitigation measures, the centering of racial equity considerations, and station area planning.

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. The Planning Commission recognizes the critical intersection of population growth, land use, and transportation. Seattle's ongoing and anticipated growth necessitates a significant investment in transit including the WSBLE project. The anticipation of future light rail extensions will likely lead to land use changes and increased density around the stations. The study and eventual selection of alignments and station locations is critical as near-term decisions will determine the potential for long-term station area planning, equitable transit-oriented development, and placemaking opportunities. Leveraging this significant transit infrastructure investment to benefit all Seattle communities, including those who live, work, and play here, should be our collective priority.

Seattle Planning Commissioners strongly urge Sound Transit to evaluate the benefits and impacts of the WSBLE project through a lens that considers a hundred-year horizon, well beyond the short-term construction timeline for this project. Keeping this long-term perspective in mind, the EIS should clearly identify how the many factors considered in the analysis will be weighed and balanced in the final selection of the preferred alternative. We recommend an approach that balances the need for consistent evaluation of all stations according to Sound Transit's criteria with the fact that all station areas are unique in current use and past histories, and as such require an evaluation of impacts and proposed mitigation that align with the needs and history of each community area. Sound Transit should clearly identify and make transparent the rationale for the evaluation criteria in the Final EIS. Similarly, the EIS should clarify what thresholds were used to determine what was considered an impact to be raised in the analysis. Lastly, in areas where mitigation measures are explained by referring to a policy or document external to the EIS, greater detail should be included within the body of the EIS to summarize the measures that result from the referenced policies or regulations.

We commend Sound Transit for a comprehensive body of work represented by the DEIS. Planning Commissioners would like to call attention to the need for additional analysis by Sound Transit and the City of Seattle to create the best outcomes from this significant transit investment. We strongly urge Sound Transit and the City to continue to work together on issues that require ongoing interagency cooperation and coordination, including identification of a final preferred alternative, appropriate and meaningful mitigation measures, the centering of racial equity considerations, and station area planning.

### **Equity and Environmental Justice**

- Particular attention should be paid to minimizing, if not avoiding, potential negative impacts in the Chinatown/International District (C/ID) and Delridge neighborhoods.
- More of the valuable knowledge shared by communities in the Racial Equity Toolkit (RET) process should be reflected in the EIS.
- The EIS should indicate what measures will be taken to ensure access is maintained to all businesses, services, and public spaces for impacted C/ID communities in the project corridor.
- Mitigation measures for businesses impacted by construction in the C/ID and Delridge should be provided in greater detail and additional measures should be considered for high-risk businesses.

- Sound Transit should identify how the project will restore impacted areas and partner with the City and other agencies to repair a long history of harm.

The Chinatown/International District (C/ID) and Delridge communities have both experienced historic and continued inequities. While negative impacts may be experienced by communities along the entirety of the West Seattle and Ballard alignments, particular attention should be paid to minimizing, if not avoiding, potential negative impacts in these neighborhoods due to the cumulative effect of the negative impacts they have already experienced. We are encouraged that the City of Seattle has partnered with Sound Transit on the application of the Racial Equity Toolkit (RET) on this project. Planning Commissioners would like to see more of the valuable knowledge shared by communities in the RET process reflected in the EIS. The planning process should optimize the hundred-year plus benefits of this transit infrastructure while minimizing any potential disproportionate short- and long-term impacts to the affected communities.

The RET indicates that the C/ID is the only station area in the WSBLE project corridor where the population of communities of color is higher than the citywide average of 34 percent. Within the C/ID, people of color account for 65 percent of the population. The C/ID faces the additional equity challenges of a median household income well below the city average, a higher-than-average proportion of residents who are elderly and disabled and compounding environmental stressors that result in an average life span that is shorter than other Seattle communities<sup>1</sup>. Given this combination of equity concerns and history of inequitable outcomes from infrastructure projects, the C/ID must be treated with additional attention and care. The EIS should indicate what measures will be taken to ensure access is maintained to all businesses, services, and public spaces for impacted C/ID communities in the project corridor. Sound Transit and the City of Seattle must work together to not only minimize negative impacts to C/ID communities but also to find new partnerships with communities and repair past harms. Efforts should be made to go beyond the minimum requirements of construction mitigation to ensure a high quality of residential and business life is maintained for those who live, work, and play in the area throughout the construction process.

Within both the C/ID and Delridge, communities have noted the large number of potential business displacements associated with each alignment option. Planning Commissioners are concerned about impacts to social cohesion and the ability of impacted businesses to relocate within their respective neighborhoods. Within the C/ID, the proposed alignments along Fifth Avenue will cause temporary and permanent changes to key businesses and landmarks, such as the Chinatown gate, that could also impact the cultural identity of the neighborhood. We would like to see a discussion included in the EIS of what potential costs the City of Seattle and/or a third party would need to absorb to make the Fourth Avenue alignment more feasible.

Even with relocation assistance provided by Sound Transit, Planning Commissioners are concerned that businesses displaced or temporarily impacted by construction will not be able to weather the impacts to their income. Even temporary changes to access for community members during construction can have a large impact on the social fabric of the community, particularly when impacted businesses serve as cultural anchors to a community. The planned mitigation measures for businesses

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<sup>1</sup> Sound Transit and City of Seattle. "West Seattle and Ballard Link Extensions Racial Equity Toolkit Report: Environmental Review Phase," February 2022. <https://www.soundtransit.org/sites/default/files/documents/west-seattle-ballard-link-extensions-ph-2-racial-equity-toolkit-draft.pdf>, p. 8.

impacted by construction in the C/ID and Delridge should be provided in greater detail and additional measures should be considered for high-risk businesses that may not be able to withstand temporary closures or relocation. We provide some suggestions for how to better represent the differential impacts to businesses and the communities they serve in the Housing and Displacement section of this letter below. We recommend expanding the analysis of business displacements in the EIS to include an equity lens. This expanded analysis will provide a more complete picture of how business displacements impact surrounding communities.

Sound Transit should identify how the project will restore impacted areas and partner with the City and other agencies to repair a long history of harm. The benefits referenced in the DEIS to balance the numerous harmful impacts of such a large-scale infrastructure project are at times vague, such as improved travel experience or improved connections to culturally relevant businesses. Such benefits are inherent in an improved transit system, but they do not explain what specific mitigation measures Sound Transit will take to avoid adding to the history of harm in the C/ID and Delridge. Sound Transit should identify how their approach will create additional co-benefits with the communities impacted by the project. The decision-making process for alignments in the C/ID and Delridge needs to be more transparent and must be responsive to the concerns of the community. The Planning Commission recognizes that Sound Transit is making an effort to conduct additional community engagement in these two neighborhoods. Sound Transit should clarify to what extent the community input will be included in the final decision-making process.

### **Climate Change**

- The EIS should clearly demonstrate how Sound Transit will address sustainability and climate resiliency goals for the WSBLE project.
- The EIS should analyze potential long-term impacts of climate change on the WSBLE project and include what mitigation measures will be taken to make the project resilient against those impacts.
- The DEIS does not sufficiently recognize the impacts of climate change and environmental health in industrial areas. The EIS should identify proactive actions to plan for and mitigate sea level rise and flooding impacts. The EIS should also identify specific mitigation actions for future stations in industrial areas with contaminated soils.

Given that the West Seattle and Ballard Link Extensions will be a key component of Seattle's transportation network for the next 50-100 years, we encourage Sound Transit to include an analysis of the forecasted impact of climate change on the stations and guideways. Estimates show that Seattle will likely experience at least 10 inches of sea-level rise by 2050 and 28 inches by 2100<sup>2</sup>. A map of sea-level rise created by Seattle Public Utilities shows that several of the WSBLE project segments fall into areas of concern for sea level rise, such as the SODO, Duwamish, and Smith Cove segments. The analysis should explore how projections of sea-level rise, changes in precipitation, and other climate shifts could impact the portions of the project located near shorelines and tidal flat fill areas.

The DEIS references the Sound Transit 2019 Sustainability Plan as a guiding document for how the project will address sustainability and climate adaptation goals. We appreciate Sound Transit's goals to

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<sup>2</sup> Seattle Public Utilities. "Projected Climate Changes." Seattle.gov. City of Seattle. Accessed March 16, 2022. <https://www.seattle.gov/utilities/protecting-our-environment/community-programs/climate-change/projected-changes>.

improve the sustainability of capital projects, from reducing energy and water use at facilities to creating projects that meet LEED Platinum certification standards. The sustainability plan also aims to conduct a Climate Change Vulnerability Assessment for each major system capital expansion project. The DEIS, however, does not indicate whether a climate change assessment was conducted for the WSBLE project or which of the goals, if any, will be achieved through the Sound Transit 3 expansion. Sound Transit and the City of Seattle must work together to build infrastructure with a minimal carbon footprint and a high level of sustainability. Light rail expansion will support the region's goals to improve sustainability by increasing transit use and reducing single occupancy vehicle use, but such a large-scale project must go further to protect against the negative climate impacts created by construction and operation as well. The EIS should clearly demonstrate how Sound Transit will address sustainability and climate resiliency goals for the WSBLE project.

Climate change is one of the most pressing issues of our time and the dangers it presents cannot be ignored. Our region cannot afford to complete large-scale projects that do not utilize the latest technology to minimize climate impact and ensure the long-term investment can endure projected changes. The EIS should analyze potential long-term impacts of climate change on the WSBLE project and include what mitigation measures will be taken to make the project resilient against those impacts. The EIS should include a clear summary of the climate considerations explored in the analysis. If the analysis indicates that some alignment alternatives would have different sustainability outcomes, those differences should be included in the alternatives comparison matrix in order to facilitate the consideration of climate concerns in the preferred alternative selection process.

We are concerned that the DEIS does not sufficiently recognize the impacts of climate change and environmental health in industrial areas. The future station areas in Interbay and SODO are low in elevation and at high risk of sea level rise. Changing precipitation rates will increase risk of flooding in these areas. The EIS should identify proactive actions to plan for and mitigate those impacts. The station designs should maximize every opportunity to incorporate sustainability, including green stormwater infrastructure and sustainable materials. The EIS should also identify specific mitigation actions for future stations in industrial areas with contaminated soils.

### **Transit-Oriented Development**

- Sound Transit should be intentional about selection of alignment options that support the potential for transit-oriented development in station areas, especially in the immediate station context.
- The EIS should analyze how each alternative will impact the urban fabric when compared to the current and future land use maps. Considerations should include the development potential of remnant parcels, expected development of the area based on current zoning, and what alternatives would require changes to zoning to maximize the efficiency of the new stations.

The future WSBLE stations represent part of a collective vision for growth in Seattle. The Sound Transit 3 project will connect neighborhoods and areas of the city in new ways and will influence how communities interact with the new station areas for decades to come. The city cannot miss this opportunity to help shape excellent urban spaces around each station. Sound Transit and the City of Seattle are already coordinating on station area planning and design to ensure new stations fit cohesively into the existing context of each neighborhood. Part of this coordination must also include

how to best support transit-oriented development (TOD) and how to maximize planning for these station areas in the Major Update to the Comprehensive Plan.

We appreciate Sound Transit's efforts to develop an Equitable TOD (eTOD) policy that prioritizes affordable housing and community partnerships for the use of surplus property after construction is complete. Sound Transit's commitment to working with communities, particularly underrepresented communities, in the development of remnant parcels and station areas must be elevated and progress toward this goal made transparent. The Planning Commission wants to ensure that the needs of local communities, particularly Black, Indigenous, and people of color (BIPOC) and low-income communities, are not lost in a calculation of highest intensity development opportunities or the most cost-effective selection of parcels. In accordance with their eTOD policy, Sound Transit should be intentional about selection of alignment options that support the potential for coherent future development in station areas, especially in the immediate station context.

Alignment choices that leave behind oddly shaped or scattered parcels that are unsuitable for development have a lasting impact on the urban fabric. The legacy of planning for future development of land impacted by light rail construction is evident in South Seattle where there are still undeveloped remnant parcels in the project corridor. The vacant parcels are an unfortunate use of space in a city struggling to accommodate rapid growth and create an unpleasant environment for those who live, work, play, and commute in the area.

Future potential to develop welcoming, resonant, and useful urban spaces post-construction should be part of the evaluation for a preferred alignment. The EIS should analyze how each alternative will impact the urban fabric when compared to the current and future land use maps. Considerations should include the development potential of remnant parcels, expected development of the area based on current zoning, and what alternatives would require changes to zoning to maximize the efficiency of the new stations. To support this process, eTOD opportunities and challenges associated with each station alternative explored in the EIS in section 4.2/3.2.5.2 should be summarized and included in the alternative comparison matrix in the EIS. Inclusion in the matrix will help decision makers keep this factor in mind when balancing the many impacts of each alternative.

### **Stations in Industrial Areas**

- We are concerned about potential displacement of industrial businesses, impacts to freight corridors, and economic, transportation, and construction effects that may result from siting future light rail stations in areas currently zoned for industrial uses.
- Sound Transit should consider the potential for land use and resulting ridership changes associated with the various industrial zoning scenarios proposed in the City's Industrial and Maritime Strategy.
- The EIS should clearly identify how future light rail stations will interact with the surrounding and/or adjacent industrial and maritime lands. This includes identification of land use and transportation impacts around light rail stations in industrial areas.
- Sound Transit should coordinate with the City to consider the development potential of light rail stations in industrial areas and evaluate the potential for transit-oriented development and associated ridership using both continued industrial zoning designation and zoning that anticipates increases in commercial and residential uses.

- The EIS should include a more robust analysis that recognizes the need for balanced use of arterial streets around stations in industrial areas for freight mobility and multi-modal transportation for workers connecting to job centers. The EIS should identify appropriate mitigation measures to ensure optimized access and safe travel options for both workers and other users.

Of the fourteen planned stations along the various WSBLE alignments, six are either within industrial zones or capture a significant amount of industrial zoned land within their walksheds. Four of these stations – SODO, Smith Cove, Interbay, and Ballard – are within the City’s designated manufacturing/industrial centers (M/ICs), the Ballard/Interbay/Northend M/IC (BINMIC) and the Greater Duwamish M/IC. The Planning Commission has historically advocated for protection of industrial and maritime lands and the jobs that are created within those sectors. We recommend that the final preferred alternative minimize or avoid impacts to the long-term viability of Seattle’s industrial lands. We are concerned about potential displacement of industrial businesses, impacts to freight corridors, and the resulting short- and long-term economic, transportation, and construction effects that may result from siting future light rail stations in areas currently zoned for industrial uses. We have also already shared our concerns in the Climate Change section of this letter above that the DEIS does not sufficiently recognize the impacts of climate change and environmental health in industrial areas.

The Planning Commission has a particular interest in considering changing trends in industrial and manufacturing uses and how that may affect future development in the BINMIC and Greater Duwamish M/IC. We have noticed that the land use analysis in the WSBLE DEIS is based on current zoning in industrial and maritime areas and does not reflect the proposed zoning changes studied in the City of Seattle’s Industrial and Maritime Strategy DEIS. We recognize that the proposed Industrial and Maritime Strategy has not been officially adopted at this time, but strongly recommend that Sound Transit consider the potential for land use and resulting ridership changes associated with the various industrial zoning scenarios proposed by the City. The Industrial and Maritime Strategy includes innovative land use strategies for the future of industry that will create significant economic development opportunities near those light rail stations in and adjacent to industrial areas. Sound Transit and the City should coordinate to ensure consistency between job growth and ridership projections in the Industrial and Maritime Strategy DEIS and the WSBLE DEIS.

The Planning Commission has consistently encouraged a comprehensive approach to determining a mix of uses in the walksheds around future light rail stations in industrial areas that optimizes the light rail investments without diminishing the functionality and viability of existing industrial and maritime lands. We strongly recommend that the EIS clearly identify how future light rail stations will interact with the surrounding and/or adjacent industrial and maritime lands. This includes identification of land use and transportation impacts around light rail stations in industrial areas. The Planning Commission has significant concern about business displacement in industrial areas, particularly for small businesses and businesses that have limited options for geographic location. The EIS should identify proactive mitigation to prevent economic impacts or business closures.

The Planning Commission recognizes the tension between preservation of industrial lands and the growth of 15-minute neighborhoods, sometimes referred to as complete neighborhoods. However, we believe that the WSBLE project and the City’s Industrial and Maritime Strategy can work together as part of a larger economic development strategy for Seattle. Sound Transit should coordinate with the City to consider the development potential of light rail stations in industrial areas, including

opportunities for equitable transit-oriented development. We request that Sound Transit evaluate the potential for transit-oriented development and associated ridership using both continued industrial zoning designation and zoning that anticipates increases in commercial and residential uses. We are concerned that the EIS alternatives directly impact developable industrial land in some specific locations. For example, one alternative in South Interbay bisects industrial land, preventing a significant opportunity for future development. Sound Transit and the City should coordinate with the State of Washington in redevelopment of the twenty-five-acre Seattle Armory property, currently occupied by the Washington National Guard, which is adjacent to the light rail alignment in Interbay.

The WSBLE project is part of Sound Transit's regional system that will allow workers to access jobs from neighborhoods across the city and from outside of Seattle. One anticipated impact of the future stations in industrial areas is more pedestrians and bike traffic in areas with large streets and heavy truck traffic. The DEIS states that increased access to transit from the WSBLE project will result in reduced automobile use, increasing efficiency on freight routes. We recommend a more robust analysis that recognizes the need for balanced use of arterial streets around stations in industrial areas for freight mobility and multi-modal transportation for workers connecting to job centers. The EIS should identify appropriate mitigation measures to ensure optimized access and safe travel options for both workers and other users.

### **Transportation, Transit, Multi-Modal Connections**

- The EIS should clearly identify how each alternative would affect transit access and efficiency, especially for transit-dependent populations and BIPOC communities.
- The EIS analysis should identify transit re-routing plans to maximize efficient commuting to job centers. Sound Transit and King County Metro should coordinate transit restructuring and work with the City to ensure coverage of most of Seattle within a short walk of frequent transit.
- We recommend evaluating transit integration and non-motorized (bike/pedestrian) access at each of the proposed station locations. The EIS should also consider the potential increase in rideshare use to access light rail stations.

The WSBLE project presents a key opportunity to ensure that people that live, work, or play in Seattle have safe, affordable, reliable travel alternatives. WSBLE project planning must place significant emphasis on convenience and usability of the system, especially making sure people can safely access and use the stations. The EIS should clearly identify how each alternative would affect transit access and efficiency, especially for transit-dependent populations and BIPOC communities. We recognize that the future light rail extensions will replace or restructure existing bus routes and change access to the 15-minute transit network. The EIS analysis should identify transit re-routing plans to maximize efficient commuting to job centers. Sound Transit and King County Metro should coordinate transit restructuring and work with the City to ensure coverage of most of Seattle within a short walk of frequent transit. Network restructuring should achieve better levels of transit access for most of the city than we have now. Ongoing data collection after completion of the WSBLE project can be used to monitor and adapt transit changes to re-route bus resources more effectively.

The Planning Commission recommends evaluating transit integration and non-motorized (bike/pedestrian) access at each of the proposed station locations. The WSBLE project must link seamlessly and efficiently into a robust multi-modal network. The EIS should also consider the



potential increase in rideshare use to access light rail stations. This analysis should be used to incorporate rideshare access and loading zones into station designs.

### **Housing and Displacement**

- The Planning Commission has significant concerns about the potential for displacement within the C/ID and Delridge neighborhoods along the project corridor. The EIS does not include analysis of potential impacts of indirect displacement and the disruption to social cohesion when residents and culturally significant businesses are forced to move.
- Sound Transit should work with the City of Seattle to assess the potential for indirect displacement within each project segment and to discuss mitigation strategies to minimize displacement.
- The analysis of business displacements in the C/ID and Delridge should be expanded to identify impacted businesses by name and assess their relative ability to withstand relocation.
- The EIS should include a similar analysis to that included in the Racial Equity Toolkit that compares the number of businesses lost with the number and types of businesses that could be accommodated by new development. The analysis should also include what measures are in place to ensure new commercial spaces meet the needs of the impacted communities.

The WSBLE project will create major disruptions within the neighborhoods where new guideways and stations are built. The Planning Commission has significant concerns about the potential for displacement within the C/ID and Delridge neighborhoods along the project corridor. We have previously requested that Sound Transit conduct a rigorous analysis to identify ways to minimize, if not avoid, commercial and residential displacement resulting from guideway and station construction. We also requested an assessment of the potential for affected property owners to relocate within the same area. Sound Transit acknowledges within the DEIS that some homes and businesses will be displaced, and that relocation support will be provided to those who must move to accommodate the project. However, the DEIS does not present the full picture of potential displacement. The existing analysis leaves out potential impacts of indirect displacement and the disruption to social cohesion when residents and culturally significant businesses are forced to move. The EIS could also do more to explore the potential for property owners to relocate within the neighborhood and offer mitigation opportunities to maximize this potential.

Major infrastructure investments such as light rail are known to be a factor in the indirect displacement of low-income and BIPOC communities. In addition to the assessment of direct displacements provided in the DEIS, Sound Transit should work with the City of Seattle to assess the potential for indirect displacement within each project segment and to discuss mitigation strategies to minimize displacement specific to each location and adjacent communities. The assessment and mitigation strategies could be informed by lessons learned from Sound Transit 1 and Sound Transit 2 and the communities impacted by those portions of the light rail system.

The DEIS includes a high-level look at the number of businesses and residences that will be displaced by each alternative, but the numbers included in the alternatives comparison charts oversimplify the impacts. Such a high-level summary does not fully convey the impact of displacement on financially vulnerable households and businesses and the overall impact of many displacements to the social fabric of a tightly knit community. Although it is challenging to include significant detail in a comparison matrix, the matrix will likely be relied upon to help decision makers balance the many complicated

impacts of each alternative. Displacement should be included in the matrix in a more nuanced way, perhaps through an indexed score or impact scale, that could take into account additional details such as whether residential displacements include affordable housing units or when potentially displaced businesses are identified as culturally significant by the community. These additional details should be broken down clearly for each alternative and highlighted in the summary matrix that compares impacts across alternatives to ensure the information is considered in the final alignment selection.

In Section 4.2, the DEIS provides more detail on the maritime businesses that may be impacted by the project for the Duwamish segment of the project, but the same level of detail is not provided for businesses in other segments. The analysis of business displacements in the C/ID and Delridge should be expanded to identify impacted businesses by name and assess their relative ability to withstand relocation. Some businesses may not be able to successfully adapt to a new space or may not be able to maintain their customer base even if only relocated a few blocks away from their original location. Relocation outside of the neighborhood will simply not work for most businesses in the C/ID and even short-term closures or access issues can disrupt vital community support networks. Women or BIPOC-owned small businesses and cultural anchors that may be displaced by the alternatives should also be highlighted.

The RET includes a more detailed exploration of community impacts for the C/ID and touches on business displacement. The RET helpfully tries to compare the number of businesses displaced by the alternatives with the amount of new commercial space that could be built after the project is complete. Unfortunately, the analysis compares the number of businesses lost to the potential square footage of new commercial space, which is an apples to oranges comparison that does not convey whether the space added will be sufficient or compatible to replace the lost space. The EIS should include a similar analysis that compares the number of businesses lost with the number and types of businesses that could be accommodated by new development. The analysis should also include what measures are in place to ensure new commercial spaces meet the needs of the impacted communities.

### **Visual Impacts**

- The existing visual representations provided by Sound Transit do not sufficiently demonstrate the anticipated cumulative effects of the various elevated guideways and stations. Additional visualizations are essential to understanding the potential impacts of these alternatives.
- Sound Transit should clearly identify the criteria used for evaluating the level of visual impacts.
- Community members should have the opportunity to be involved in determining or assessing the documented visual impacts.

The WSBLE project includes guideways and station platforms of a significant height that present visual and quality of life impacts to the communities these alignments will traverse. Community members raised their concerns with these potential impacts during consideration of which alternatives to include in the DEIS. The Planning Commission's DEIS scoping letter recommended that Sound Transit clearly identify visual impacts of all elevated guideways and stations using the latest and best visualization technology and methods, including photorealistic 3-D imagery. While we appreciate inclusion of visual representations in the DEIS, the existing images provided by Sound Transit do not sufficiently demonstrate the anticipated cumulative effects of the various elevated guideways and stations. Additional visualizations from a greater number of viewpoints and especially from a ground-level

pedestrian perspective are essential to understanding the potential impacts of these alternatives. The Planning Commission also recommends that Sound Transit clearly identify the criteria used for evaluating the level of visual impacts. We are concerned that community members have not been involved in determining or assessing the documented visual impacts. The various communities along the DEIS alternatives should be involved in deciding what they consider the value of their built environment and to what degree the added light rail infrastructure would affect it.

We appreciate the opportunity to provide our comments on the DEIS. If you have any questions, please do not hesitate to contact Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,

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Jamie Stroble, Co-chair  
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