



Seattle Planning Commission

September 28, 2018

Dear City of Seattle Members of Sound Transit's Elected Leadership Group:

As an independent advisory body to Seattle's elected officials and Department staff, we are pleased to submit the following comments and recommendations on the West Seattle and Ballard Link Extensions Level 2 Alternatives to move forward to Level 3. We offer for your consideration the following overarching comments that relate to all alternatives, as well as specific comments pertaining to the individual project segments and components of those segments.

Seattle Leads with Racial Equity and Social Justice

Understanding the need to make tradeoffs to develop a locally preferred alternative, we strongly urge Seattle elected officials to ensure those tradeoffs are not made at the expense of an equitable, connected, and well-integrated system that benefits all communities, especially those who have and continue to experience historic and current inequities. Moving forward into Level 3, the Planning Commission recommends:

Application of a Racial Equity and Social Justice Lens

- Weighting the evaluation criteria to prioritize race and social equity and other considerations articulated in our Comprehensive Plan
- Favoring alignments that reflect the priorities of the communities served by minimizing negative impacts and optimizing benefits to those neighborhoods
- Prioritizing and investing in station locations and alignments that address long- and short-term disproportionate negative impacts, especially in Chinatown/International District and Delridge

Creating an Equitable, Long-Range Framework for Future Generations

- Conducting a Level 3 evaluation through a racial equity and social justice lens that considers the hundred-year horizon, well beyond the short-term construction timeline for this project
- Siting stations where existing and future land use can optimize the high-capacity transit through ease of access and residential and employment proximity
- Acknowledging that any station location will mandate potential zoning revisions, including changes of use and increased density, while needing to address affordability

Partnerships and Funding Transparency

- Pursuing innovative partnerships around funding before eliminating alternatives

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- Disaggregating the costs of the segments to better understand which specific components of segments cost more than the baseline and which components cost less

Site-specific considerations and recommendations follow.

West Seattle /Duwamish Segment

- The Planning Commission has significant concerns about the qualitative and practical impact of the high-elevation alignment alternatives within the West Seattle segment. Several of the alternatives under study include guideways of a significant height, potentially up to 160 feet high. These high guideways and the associated station platforms present accessibility and safety challenges, as well as significant visual and quality of life impacts to the communities these alignments will traverse. While a good start, the existing visualizations provided by Sound Transit do not sufficiently address these concerns. Additional modeling and visualizations, especially from a ground-level pedestrian perspective, are essential to understanding the potential impacts of this segment's alternatives.

Alaska Junction

- The terminus station at the Alaska Junction must be sited and designed to best meet the needs of existing and future land uses in the vicinity. This station must also serve a robust walkshed, or one with the potential for being so, and multi-modal connections that maximize potential ridership.
- We support a tunnel alignment entering the Alaska Junction and a station location near 42nd Avenue SW and SW Alaska Street, as shown in the Pigeon Ridge/West Seattle Tunnel alternative. This station location provides convenient access to California Avenue SW and businesses along 42nd Avenue SW. This location would be the least disruptive to the surrounding neighborhood and provides the best access for people with disabilities.
- The Planning Commission has concerns with any proposed elevated alignments in the Alaska Junction. Elevated guideways and station platforms in this area would disrupt the pedestrian-oriented scale and character of the historic Alaska Junction commercial district.

Avalon-Genesee-Dehridge

- We feel strongly that the Dehridge neighborhood needs a light rail alignment and station location that prioritizes equity and access for this historically underserved community.
- We support those alternatives, specifically Pigeon Ridge/West Seattle Tunnel and Golf Course/Alaska Junction/Tunnel, that would result in a lower elevated guideway through the Dehridge neighborhood. Those alternatives with higher elevated alignments and station platforms would negatively impact the quality of life for those who live and work in the Dehridge community below. High station platforms also present potential accessibility challenges to people with disabilities.
- Any Dehridge station locations recommended for further evaluation in Level 3 should provide opportunities for equitable transit-oriented development, access to community amenities, and seamless transit connections.
- The Pigeon Ridge/West Seattle Tunnel station location alternative is in close proximity to the Dehridge Playfield and Youngstown Cultural Arts Center. This location at the intersection of SW Genesee Street and Dehridge Way SW also provides convenient multi-modal connections to South Seattle College and other community destinations to the south.

- The Golf Course/Alaska Junction/Tunnel station location alternative presents a significant opportunity for future equitable transit-oriented development.

Duwamish Crossing

- We see the potential for the Pigeon Ridge/West Seattle Tunnel alignment to provide flexibility for future infill stations in SODO, though we recognize the significant projected cost increase.
- The Planning Commission supports a Duwamish crossing bridge alignment that balances cost with limiting impacts to the Duwamish Greenbelt and freight operations.

SODO and Chinatown/ID Segment

SODO

- The Planning Commission encourages the study in Level 3 of alignment options that eliminate the need for an interim transfer at SODO for West Seattle riders as the Ballard extension is being built.
- As the existing SODO and Stadium stations have demonstrated low ridership numbers, we question the need for two new stations in this segment in ST3. Additional stations should only be created if potential new development and employment in the SODO neighborhood indicate the potential for increased ridership.
- The Planning Commission endorses the Surface E-3 alternative as the most economical option.
- Although we recognize that this corridor currently serves several important regional bus routes, we also understand that the E-3 busway may not be necessary over time as increasing rail service becomes available. Further study on the impacts to bus routes potentially impacted, should an E-3 alignment be selected, is warranted.

Chinatown/International District (C/ID)

- The Planning Commission feels strongly that equity should be a priority consideration in the analysis and eventual selection of a new C/ID station location and associated construction method.
- We have serious concerns about the proposed 5th Avenue S station location. Cut-and-cover construction would cause significant disruption to local businesses and the neighborhood as a whole. While this type of construction would cause similar effects to any neighborhood, the potential impacts to the C/ID raise equity concerns and those impacts should be avoided.
- This historic, culturally significant neighborhood has been traditionally underserved and repeatedly subjected to an inordinate number of disruptive capital improvement projects. We are concerned that construction activities on 5th Avenue S might have not only temporary access disruptions but could lead to permanent residential and business displacements in this vulnerable community.
- As an alternative to the 5th Avenue S location, the Planning Commission endorses a 4th Avenue S alignment and station location employing a cut-and-cover construction method for further study in Level 3. There is strong community support for a 4th Avenue S alignment that should be acknowledged from the Level 2 screening process. The 4th Avenue S station alternative has multiple benefits to consider:
 - This location would allow transit riders convenient connections to other travel modes including Sounder and Amtrak trains at King Street Station;
 - Realizing the opportunity to re-create 4th Avenue S as a multi-modal corridor;

- Improving the 4th Avenue S/S Jackson Street/2nd Avenue Extension S triangle, which is currently not pedestrian-friendly; and
- Realizing the potential of Union Station as a vibrant regional multi-modal hub.
- We understand that light rail construction along 4th Avenue S would necessitate rebuilding the historic viaduct at this location. Partnerships between agencies will be critical for the success of this project, and this is particularly true at this station location. This is an exceptional opportunity to forge cross-jurisdictional partnerships to achieve a greater vision.
- If Sound Transit ultimately selects a 5th Avenue S station location and the 4th Avenue S viaduct is replaced at a later date, the C/ID would experience two separate and significant construction disruptions on top of those already endured.
- Regardless of the ultimate location selected, the Planning Commission believes that a new station in the C/ID is an opportunity to enhance transit connections and make the area more pedestrian-friendly.
- We do not support further consideration of the deep mined station options at this location. These stations would be very deep, limiting easy connections between stations and requiring elevators for station access. A lack of escalators at a significant regional transportation hub raises safety concerns.

Interbay/Ballard Segment

Smith Cove-Interbay

- The Planning Commission recommends evaluating the option of designing the Interbay/Ballard alignment to accommodate a Smith Cove station but not constructing one until it can be demonstrated that future land uses will support the station. Any cost savings identified could help offset additional costs elsewhere.
- We also recommend considering the risk of sea level rise around any proposed Smith Cove station including the Armory site and areas to the south.
- We recommend prioritizing further study of the Smith Cove station location on the three Central Interbay alignments (closer to Terminal 91), as that location has better transit-oriented development potential than the other station locations further south on Elliott Avenue W.
- We also recommend considering the potential for transit-oriented development when selecting the Interbay station location. Future development in this area could lead to a potential new urban village on either side of the Dravus Street bridge, including the lower east slope of Magnolia.

Salmon Bay Crossing

- The Planning Commission suggests eliminating alternatives with a movable bridge from further consideration.
- We endorse alternatives that include a tunnel under Salmon Bay, as a tunnel would have the fewest impacts on maritime and industrial businesses in the vicinity.
- We recommend that the bridge alternatives adjacent to 15th Avenue NW be eliminated from further consideration. A bridge at this location could be disruptive to operations at Fishermen's Terminal.
- If a tunnel option is ultimately not selected, the Planning Commission endorses an architecturally significant multi-modal bridge serving transit, bikes, and pedestrians.

Ballard Terminus

- The Planning Commission recommends for further study the alternatives having a Ballard Terminus station on 14th Avenue NW. This location offers a wide right-of-way, provides opportunities for transit-oriented development in the station vicinity, and would be less disruptive (e.g. fewer property acquisitions) than the 15th Avenue NW alternatives. However, we are concerned about potential impacts to the Ballard/Interbay/Northend Manufacturing and Industrial Center immediately to the south of the proposed station location.
- Recognizing the need for connections to the Rapid Ride D Line and other bus routes, we recommend configuring a 14th Avenue NW station to provide access to either side of 15th Avenue NW.
- Any 14th Avenue NW alternative should be configured so as to support the line's future northward expansion.
- We also recommend eliminating the 20th/Fixed Bridge/17th alternative with a terminus station on 17th Avenue NW from further consideration. This elevated alternative would cross over buildings in the historic Old Ballard neighborhood. Narrow streets in this area would make it difficult to site a station near 17th Avenue NW.

Thank you for your consideration of our comments. If you have any questions, please do not hesitate to contact me or Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,



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Seattle Planning Commission

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