



City of Seattle

Seattle Planning Commission

April 12, 2019

City of Seattle members of the Sound Transit 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 3 Alternatives. 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 that we would recommend be studied in the Draft Environmental Impact Statement (DEIS).

Overarching Recommendations

The Commission strongly urges the benefits and impacts of the proposed West Seattle and Ballard Link Extensions be evaluated through a lens that considers a hundred-year plus horizon, well beyond the short-term construction timeline for this project. We endorse the intention to study both a "fully funded" alternative and others that could require third-party funding. While a need for third-party funding should be identified where relevant, preliminary cost estimates should not be used to eliminate alternatives or station options. We encourage studying mix-and-match combinations of the best potential alignments, regardless of cost, in the DEIS.

We recommend the Representative Project be removed from consideration as an end-to-end alternative to be studied in the DEIS. We recognize that this conceptual alignment was included in the ST3 ballot measure. However, the extensive feedback and analysis conducted since that time make it clear that changes are necessary for the project to meet the intended purpose and need. There are individual segments within the Representative Project alignment that raise significant concerns, while other segments may be worthy of further study for a potential mix-and-match alternative. We have identified those segments in our site-specific comments below.

Land Use

In our role as the steward of Seattle's Comprehensive Plan, the Planning Commission recognizes the critical intersection of population growth, land use, and transportation. 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 at this stage in the planning process. Near-term decisions will determine the potential for long-term station area planning, equitable transit-oriented development, future policy decisions, and placemaking opportunities. The Commission urges the City to proactively articulate station area visions and concerns to which Sound Transit can respond, rather than wait for a final alignment to which the City will respond. Leveraging this significant transit infrastructure investment to benefit all Seattle communities should be our collective priority.

Commissioners

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Transit-Oriented Development

To maximize the benefit of light rail extensions to those communities served, the City has a responsibility for activating the future station areas through proactive station area planning. The Commission encourages siting stations where existing and future land use can optimize the high-capacity transit through ease of access and residential and employment proximity. We recognize the potential for transit-oriented development that may require updates to the Comprehensive Plan's Future Land Use Map, as well as policy and/or zoning changes to encourage density and affordable mixed-use development in the vicinity of any station areas. The Commission has asked Sound Transit to study the potential for transit-oriented development, ridership within a robust walkshed, and multi-modal connections that maximize ridership at each of the proposed station locations.

Industrial Lands

The Commission recommends that any preferred alternative(s) will 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 requested Sound Transit evaluate the potential for transit-oriented development and associated ridership using both a continued industrial zoning designation and zoning that anticipates residential and commercial uses.

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 experiencing historic and current inequities. The Commission is encouraged that the City has partnered with Sound Transit on the application of the Racial Equity Toolkit. We recommend continued partnership and rigorous assessment of the racial equity impacts when analyzing station locations and alignments that bring disproportionate short- and long-term impacts to the affected communities.

The Commission encourages the use of analyses in the DEIS to select a final alignment whose cumulative benefits do not come at the expense of communities. Other considerations besides cost, including service to vulnerable and historically underserved populations, should inform the decision to have elevated, surface, or underground alignments. 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 the Chinatown/International District and Delridge neighborhoods due to the cumulative effect of the negative impacts they have already experienced.

Aesthetic and Quality-of-Life Impacts

The Commission has previously expressed our concerns regarding any guideways of a significant height, potentially up to 160 feet high. These high guideways and the associated station platforms present accessibility and safety challenges, as well as significant visual and quality of life impacts to the communities these alignments will traverse. The existing images provided by Sound Transit do not sufficiently demonstrate the anticipated cumulative effects of the elevated guideways and stations. We have requested Sound Transit provide additional modeling and visualizations, especially from a ground-level pedestrian perspective, for understanding the potential impacts of these alternatives.

We offer our site-specific considerations and recommendations on the following pages.

West Seattle /Duwamish Segment

Alaska Junction

The terminus station at the Alaska Junction must be sited and designed to best meet the needs of existing and future land uses in the vicinity. This station must also serve a robust walkshed, or one with the potential for being so, and multi-modal connections that maximize potential ridership. The Commission endorses study of both an elevated and tunnel alignment at this location. We have recommended Sound Transit study any potential economic and visual impacts associated with elevated guideways and station platforms in this historic, pedestrian-oriented commercial district. We recognize that the West Seattle Tunnel alternative in Alaska Junction leads to a lower guideway in Delridge (see our related comments below).

Delridge

The Commission feels strongly that the Delridge neighborhood needs a light rail alignment and station location that prioritizes equity and access for this historically underserved community. We have significant concerns about the potential for displacement in this neighborhood. All Delridge station location alternatives should provide opportunities for equitable transit-oriented development, access to community amenities, and seamless transit connections.

The Commission recommends the Representative Project alignment in this neighborhood be removed from further consideration, as the proposed station location in this alternative is the farthest from the neighborhood core. We recommend the West Seattle Tunnel and West Seattle Elevated alternatives in Delridge be studied in the DEIS. As stated in the Aesthetic and Quality-of-Life Impacts section above, the Commission supports further study of alternatives that would result in a lower elevated guideway through this neighborhood. For additional recommendations on this station, see the Commission's March 28, 2019 letter to the Seattle members of the Elected Leadership Group.

Duwamish Crossing

The Commission endorses study of both proposed Duwamish crossing bridge alignments in the DEIS. We are interested in learning more about any potential impacts to the West Duwamish Greenbelt and maritime industrial operations resulting from the two alternatives. It is also of critical importance that Sound Transit consult with any affected tribes, including the Duwamish Tribe, to identify, minimize, or avoid impacts to cultural resources in this vicinity.

SODO and Chinatown/ID Segment

SODO

The Commission recognizes that an additional light rail station in SODO can be a catalyst for potential land use changes in the neighborhood. As the existing SODO and Stadium stations have demonstrated low ridership numbers, we strongly recommend siting of the new SODO station to maximize potential ridership, including potential new development and employment, in the SODO neighborhood. We also encourage consideration of lessons learned from the existing station when determining the ideal location for a new station.

Chinatown/International District (C/ID)

The Commission recommends that equity be a priority consideration in the analysis and eventual selection of a new C/ID station location and associated construction method. This historic, culturally significant neighborhood has been traditionally underserved yet repeatedly subjected to disruptive capital improvement projects. We are concerned about the potential short-term impacts and long-term effects resulting from construction of this station, especially displacement of residences and small businesses.

The Commission recommends the Representative Project C/ID alignment be removed from further consideration due to our serious concerns regarding the proposed cut-and-cover construction along 5th Avenue S. The construction impacts from a longer cut-and-cover tunnel on 5th Avenue S in the Representative Project would be significantly more disruptive to small businesses and the quality of life for C/ID residents than the other proposed alternatives at this location.

The Commission recommends the 5th Avenue bored tunnel/cut-and-cover station and 4th Avenue cut-and-cover station alternatives be included for further study in the DEIS. We do not support further consideration of the deep mined station options on either 4th or 5th Avenue. These stations would be very deep, requiring elevators for primary station access and yielding challenging connections between stations, both of which raise public safety concerns.

The 4th Avenue S station alternative offers multiple potential benefits. This location would allow transit riders convenient connections to other travel modes including bus and streetcar, as well as Sounder and Amtrak trains at King Street Station, while encouraging bicycle and pedestrian mobility. We recognize that light rail construction along 4th Avenue S would necessitate coordination between the City of Seattle and Sound Transit in replacing the historic viaduct at this location. The Commission sees this as an exceptional opportunity to forge cross-jurisdictional partnerships to realize 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 (potentially up to two decades of continuous construction impacts) on top of those already endured.

Regardless of the ultimate location selected, the Commission believes that a new station in the C/ID should enhance transit connections and make the area more pedestrian-friendly. Many transit agencies already operate in the C/ID. A new tunnel and station will foster and strengthen regional transit connections if it functions elegantly and efficiently as Seattle's largest transit hub. For additional recommendations on this station, see the Commission's March 28, 2019 letter to the Seattle members of the Elected Leadership Group.

Downtown

The Commission recommends further study of the proposed Midtown stations to analyze pedestrian access to the new tunnel entrances, including topography and distance from the existing transit tunnel stations.

The South Lake Union station represents a multi-modal opportunity to maximize transit ridership in a rapidly growing neighborhood. We encourage further study of ridership and transit integration at each of the proposed station locations. Harrison Street in particular would provide good transit integration, as this is a significant east-west transit corridor.

We recommend study of pedestrian access and traffic considerations at each of the proposed Seattle Center stations. We have concerns about the proposed station location on Mercer Street, as this vicinity already experiences heavy volumes of pedestrian traffic, including seniors, and freight movement.

Interbay/Ballard Segment

Smith Cove-Interbay

The Commission recommends further study of each of the proposed Smith Cove station locations, with particular emphasis on ridership, transit integration, and non-motorized/pedestrian access. We recognize the risk of sea level rise around any proposed Smith Cove station including the Armory site and areas to the south. We have requested Sound Transit study potential climate change impacts in this vicinity.

The Commission recommends further study of each of the proposed Interbay station locations, including the Representative Project station at 15th Avenue W and W Dravus Street. As indicated in our comments above on 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. The Commission has a particular interest in considering changing trends in industrial and manufacturing uses and how that may affect future development in the Ballard/Interbay/Northend Manufacturing and Industrial Center (BINMIC).

We also encourage analyzing the potential for transit-oriented development at the proposed station locations, as land use in Interbay has the potential to change with station siting. For example, future development in this area could lead to a new urban village on either side of the Dravus Street bridge, including the lower east slope of Magnolia.

Salmon Bay Crossing

The Commission recommends eliminating the Representative Project from further consideration in this segment. A movable bridge raises operational concerns and any bridge alternatives adjacent to 15th Avenue NW would be disruptive to maritime and industrial businesses, including operations at Fishermen's Terminal. We encourage further study of both the Ballard Elevated and Ballard Tunnel alignments. The Commission recommends using this opportunity to evaluate the potential for a new fixed multi-modal bridge over Salmon Bay that would serve light rail, bikes, and pedestrians.

Ballard Terminus

The Commission recommends further study of both the Ballard Elevated and Ballard Tunnel alternatives. We encourage consideration of pedestrian access, transit integration, and non-motorized (bike/pedestrian) access at each of the proposed station locations. The terminus station location on 14th Avenue NW in particular 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. This location could also serve as a catalyst for land use changes in the vicinity, including expansion of the Ballard urban village to the east. However, we have concerns about any potential economic impacts, including displacement, to industrial land uses in the BINMIC immediately to the south of this station location. The Commission also emphasizes the importance of configuring the Ballard Terminus station to support the line's future northward expansion.

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,

A handwritten signature in black ink, appearing to read 'Michael Austin', with a long horizontal flourish extending to the right.

Michael Austin
Chair, Seattle Planning Commission

cc:

Anne C. Fennessy, Office of the Mayor
Sam Assefa, Director, Office of Planning and Community Development
Sam Zimbabwe, Director, Seattle Department of Transportation
Carrie Avila-Mooney and Cathal Ridge, Sound Transit
Members of the Sound Transit Stakeholder Advisory Group