



Downtown  
Seattle  
Association

April 28, 2022

WSBLE Draft Environmental Impact Statement Comments  
c/o Lauren Swift  
Sound Transit  
401 South Jackson Street  
Seattle, Washington 98104  
*Sent via electronic mail to [WSBLEDEIScomments@soundtransit.org](mailto:WSBLEDEIScomments@soundtransit.org)*

Dear Ms. Swift,

By way of this letter, the Downtown Seattle Association (DSA) is submitting comment on the Draft Environmental Impact Statement for the West Seattle and Ballard Link Extension (WSBLE). The DSA represents some of the largest employers in the state, along with hundreds of small businesses, non-profit and arts and cultural organizations and a residential population of nearly 100,000 - making our neighborhood larger than all but a handful of cities in Washington State. We are Seattle's epicenter of jobs and economic activity and the Puget Sound region's hub for arts, entertainment, professional sports, and tourism.

The DSA has long been a vocal supporter of transit infrastructure projects generally, and of Sound Transit in particular. Downtown Seattle has directly benefited from regional transit investments, without which downtown's growth would have been constrained by traffic congestion and deleterious environmental effects. Pre-pandemic, downtown Seattle had become one of the most dynamic and fastest growing urban centers in the nation, and increased investment in our region's transit system was a key factor in enabling that achievement.

However, it is important to note that downtown Seattle also bears the scars of capital projects that produced long-lasting impacts that were not adequately mitigated or minimized through better urban planning. Even

now, some would say that Third Avenue has never fully recovered from the impacts of closures and intense surface-level disruption associated with constructing the Downtown Seattle Transit Tunnel more than 30 years ago. As the densest urban center in the Pacific Northwest, downtown Seattle's compact built environment, heavy community utilization and outsized concentration of all types of businesses make it particularly sensitive to construction impacts - impacts that can ripple far outside of the commonly accepted borders of downtown.

The following comments on the Draft Environmental Impact Statement (DEIS) are made with DSA's strong enthusiasm and support for the WSBLE but also with our sincere concern that construction methodologies be properly explored to minimize impact on businesses, residents, workers, and visitors and that those impacts which are unavoidable are adequately mitigated.

## **General Construction Comments and Requests**

**Comment 1: Much more information is needed to truly understand cumulative construction impacts.** This includes but is not limited to information on station and tunnel construction timing and phasing throughout the WSBLE project; street closure phasing and duration; and plans for pedestrian, transit and traffic detours. Operating without this base-line level of information for all alternatives makes it virtually impossible to make informed decisions on a preferred alignment.

**Comment 2: Adequately and transparently study all potential station and tunnel construction techniques through downtown.** While the DEIS includes statements indicating that either a single-bore or a dual-bore tunnel through downtown is under consideration, it appears that only dual-bore construction has been analyzed and indeed in meetings throughout the DEIS comment period, Sound Transit staff have presented only dual-bore and cut-and-cover options. It seems employing a single-bore tunnel methodology could present different station access and

construction opportunities and could potentially minimize anticipated impacts at surface-level, but it is not possible to assess the trade-offs of either method - both positive and negative - without more information.

**Request:** We ask that Sound Transit examine the single-bore tunnel method through downtown to identify:

- a. The difference in impacts to downtown produced by different construction methods;
- b. Construction timing, duration and phasing differences presented by different construction methods;
- c. Changes to station profiles that differing construction methods would either allow for or necessitate.

Alternatively, if Sound Transit has already studied all possible construction methods we ask that the findings be made public and information shared on how the Agency landed on dual-bore as the only feasible option.

**Comment 3: Study alternative approaches to station design and footprint in downtown.** Downtown's built environment is densely developed and heavily utilized. Large station headhouses that may be more easily accommodated in other parts of the region create an outsized impact in downtown - not just during construction, but in perpetuity.

**Request:** We ask Sound Transit examine station designs in downtown that:

- a. Creatively and positively integrate into the existing built environment with a focus on employing successful urban design principles;
- b. When feasible, incorporate station entrances and structures into existing properties and find ways to turn necessary new

infrastructure into community and/or property assets as an alternative to full condemnation;

- c. At bare minimum ensure station configuration and footprints are tailored specifically to support a dense urban core environment.

We urge Sound Transit to look at station design not through a simple “do no harm” lens, but rather as an opportunity to find creative ways to add to the fabric of the built environment or elevate current urban design.

**Comment 4: Work with the community to develop performance standards for construction impacts before contractors are selected.** DSA understands why contractors prefer flexibility. We also understand that Sound Transit may likely benefit from a lower-cost bid if fewer stipulations are placed on contractors. However, it is the community that bears the brunt of lower-cost construction methods that may create untenable impacts.

**Request:** We urge the agency to work with community members - starting now - to identify and articulate acceptable parameters and guardrails for construction impacts on existing properties, arts and cultural uses, employers and workers, traffic, transit riders and pedestrians - before contractors bid on the work for WSBLE.

## General Impacts and Mitigation Comments and Requests

**Comment 5: A thorough mitigation plan must be developed for this segment of the WSBLE.** It is not possible for DSA to comment on the efficacy of proposed detailed mitigation plans in the absence of such plans.

**Request:** We encourage Sound Transit to convene a steering committee of downtown stakeholders to participate in an adaptive process to make mitigation recommendations and/or react to Agency-proposed mitigation measures under consideration. The

DSA and our members and stakeholders stand at the ready to participate in an iterative, productive dialogue with Sound Transit on effective, robust mitigation plans.

**Comment 6: For the purposes of accurately identifying construction impacts and to inform a mitigation plan, it is imperative that Sound Transit have an up-to-date understanding of the built environment around the alignment.** DSA has witnessed agency presentations and planning materials that are very dated, including maps and satellite images still showing empty parking lots that were replaced years ago by 40-story buildings holding thousands of workers or residents. We implore Sound Transit to coordinate with the City of Seattle's Department of Construction and Inspection to obtain an accurate landscape of development projects permitted and anticipated to be constructed prior to WSBLE groundbreaking. Any assessment of construction impacts and needed mitigation is incomplete - or worse, inaccurate - without a real-time understanding of the built environment.

**Comment 7: Much more information is needed on the transportation impacts of alignment alternatives, including proposals for re-routing traffic, transit and pedestrians during identified extended periods of right-of-way closures.** It is the view of the DSA that identification of street closures provides only a fractional view of the transportation impacts needed for evaluation of alternatives. Transportation and mobility impacts extend well beyond the immediate proximity of street closures, but these impacts can only be understood and evaluated by knowing where and how traffic, transit and pedestrians will be rerouted away from proposed street closures.

**Request:** In addition to more thoroughly understanding the impacts described above, we ask that Sound Transit describe plans for maintaining vehicular, pedestrian and delivery/loading dock access to buildings in those instances in which a street closure effectively

walls off a building's only access point for one or more of these modes.

**Comment 8: As construction impacts and needed mitigation are refined, please ensure that the unique needs of arts, cultural and entertainment venues are considered.** Downtown Seattle is proud to be home to many of the region's cherished arts, cultural, and entertainment venues. These venues have needs and usage rhythms that are different than the typical commercial office, including higher utilization during evenings and weekends and increased sensitivity to noise and other disruptions. Please consider that traditional mitigation efforts, such as concentrating noise, access and construction disruption outside of normal business hours may have a disproportionately negative effect on the arts and entertainment industry due to performance and rehearsal schedules.

## Station-specific Comments and Requests

While many of the above comments apply to multiple station locations, the following comments are unique to specific stations within the DSA's area of focus.

### Midtown Station

**Comment 9: Alternative access to Midtown station.**

**Request:** Given the upward slope from 4<sup>th</sup> Avenue to 6<sup>th</sup> Avenue at this point of downtown, we ask that Sound Transit explore the feasibility of accessing the Midtown Station via a horizontal tunnel and assess how this method would change other aspects of the Midtown Station construction and profile.

## Westlake Station

**Comment 10:** Since 2015 DSA has been responsible for the management of Westlake Park through an agreement with Seattle Parks and Recreation. Sitting at the epicenter of downtown's retail and transit core, the park is a unique recreation experience for hundreds of thousands of visitors, residents and workers every year. Guided by a vision to create a vibrant, bustling, welcoming space we've worked hard to activate the park with events, games, music, food and family-friendly activities along with hiring dedicated staff and security to ensure the park is clean, safe and cared for.

Additionally, it is no secret that Third Avenue - particularly along Pike and Pine Streets - has long been plagued by public safety challenges and the COVID-19 pandemic has only exacerbated these issues. Since the beginning of 2022, we have seen conditions begin to improve with a renewed focus from the City on increased police presence, activation efforts and potential plans for streetscape and improvements to the built environment that will in the long-term contribute to maintaining stability along one of the busiest thoroughfares in our downtown core.

**Request:** We urge Sound Transit to take a holistic view when planning construction areas and street closures on 4<sup>th</sup> Avenue and Pine Street. Sound Transit should consider how these impacts would affect the surrounding area and commit to not hampering recent public safety and activation efforts by isolating one of our city's most challenging areas from the rest of the downtown retail core. Engaging with King County Metro, the City of Seattle, the King County Regional Homelessness Authority and other similar stakeholder organizations, South Transit should analyze construction impacts in that area in particular through a behavioral health and public safety lens. Thought should be put into how this project - in the short term - impacts the experience of Westlake Park and - longer term - how this station could integrate into and bring additive benefit to the park.

## **Denny Station**

**Comment 11: The proposed 4-year closure of Westlake for DT-1 Denny Station is untenable.** Based on available information, the traffic and transit impacts of the closure of this major intersection for 4 years on downtown workers, transit riders and residents does not appear mitigable. If Sound Transit continues to consider this option, a detailed plan for traffic management; transit-reroutes that maintain full-service levels; and building access must be developed to demonstrate whether and how this closure could be acceptably mitigated. DSA does not support a construction scenario that requires a multi-year closure of the South Lake Union Streetcar or other similar transit service reductions.

**Comment 12: Study the feasibility of a mix and match option connecting Denny DT-2 (Terry Avenue) to South Lake Union DT-1 (Harrison Avenue).** DSA has heard overwhelming support from our membership for these two stations locations, and little to no support for the alternatives. It appears through information currently available in the DEIS, that placing the Denny Station at Terry Avenue would avoid the unmitigable, dramatic closure of Westlake Avenue and we strongly support that option.

**Request:** If the sole obstacle to connecting these two stations is the proposed placement of a crossover track to be used during service disruptions, we urge Sound Transit to explore alternative locations for the crossover track and ask that the operational impacts of an alternative location for the crossover track be made public so that the community and the Sound Transit Board can have a clear understanding of the tradeoffs for enabling the connection of the two most optimal station locations at Denny and SLU.

## **South Lake Union Station**

### **Comment 13: DSA has a strong preference for SLU DT-1 - Harrison Street.**

The South Lake Union neighborhood is home to a growing residential population and a thriving technology and employment hub. It's compact nature and unique mix of pedestrian-oriented infrastructure and heavy transit usage by residents and commuters mean that construction impacting transportation systems in this area will be particularly disruptive. The South Lake Union Station will provide critical transit connections to downtown and SR 99 so it is imperative that this station is accessible, convenient to get to and centrally located within the neighborhood. SLU DT-2 - Mercer Street does not sufficiently meet these criteria; it puts the station outside of neighborhood boundaries and accessibility and safety is jeopardized by essentially forcing pedestrians and riders to interact with some of the most heavily trafficked roads in the city (SR 99 and Mercer Street).

DSA does not support SLU DT-2 - Mercer Street as currently configured and urges Sound Transit to connect Denny DT-2 at Terry Avenue to SLU DT-1 at Harrison Street. However, while DSA supports SLU DT-1, a detailed transportation mitigation plan is needed to maintain mobility and property access throughout the closures necessitated by the Harrison Street station alignment.

## **Conclusion**

Thank you for your attention to the Downtown Seattle Association's comments, requests, and questions. We stand ready to assist Sound Transit with the items in this letter that require collaboration and we continue to value the partnership we have enjoyed with the agency over

the decades. DSA looks forward to the promise of clean, reliable, rapid mobility that the West Seattle to Ballard Light Rail extension will bring to downtown, the city and the region.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Scholes". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jon Scholes  
President & CEO  
Downtown Seattle Association

Cc: City of Seattle