

WEST SEATTLE TRANSPORTATION COALITION

March 31, 2019

West Seattle and Ballard Link Extensions
c/o Lauren Swift
401 S. Jackson Street
Seattle, WA. 98104-2826

Sent by Email: wbscopingcomments@soundtransit.org



Re: *ST3 West Seattle and Ballard Link Extension EIS Scoping Comments on Level 3 Alternatives*

Dear Stakeholder Advisory Group, Elected Leadership Group, and Sound Transit Board Members:

The West Seattle Transportation Coalition (WSTC) works to address transportation and mobility issues for Seattle's largest constituency – the nearly 100,000 people living on the 10 square miles of the West Seattle Peninsula. WSTC's top issue has always been ingress-egress and mobility issues between our neighborhoods and Downtown or points beyond. The West Seattle Bridge Transportation Corridor (WSBTC) is the city's busiest transportation artery. It connects us with major north-south routes (SR 99, E Marginal-Alaskan Way, Airport Way, and I-5), and carries more than 122,000 vehicles a day – 14,000 on the Spokane St Swing (low) Bridge, and 108,200 on the High Bridge (*SDOT 2017 Seattle Traffic Flow Map*).

WSTC sponsored the first public Light Rail Planning Workshop in West Seattle in June 2017. Our constituents know that light rail to West Seattle will be the biggest transportation project to affect our Peninsula this century, and they want to ensure we make improvements that benefit all of our neighbors in ways that outweigh negative impacts wherever possible:

- By providing new transportation alternatives to the vehicle congestion in the WSBTC;
- By ensuring that guideway and station locations bring real, tangible benefits to the neighborhoods directly affected and not just impacts to views and acquisition of homes and businesses;
- By protecting historic buildings, community gathering spaces, and businesses in the economic enterprise nodes within and around Youngstown and the Alaska Junction Urban Village; and
- By reflecting long-standing community outreach and neighborhood planning goals.

We seek to identify options that will best meet the needs of affected communities from the West Seattle Peninsula – including White Center and further points south(west) – and SODO. This includes not just those in the walkshed or living near the guideway and stations, but also those arriving by bicycle, bus, and other modes. **Comments presented here are based on input to and outreach conducted by WSTC to date, and reflect three main objectives for the EIS Scoping Process:**

1. Consider alternatives that present real, significant, and useful differences for study and comparison in identifying the best route options and station locations.
2. Ask the right questions to gather the data that will drive the final decisions made by the ST Board.
3. Consider disruption during and after construction, and provide suitable mitigation measures for what will be considerable change, including the possible destruction of historical structures and communities along proposed routes.

1. The EIS process must consider alternatives that present real, significant, and useful differences for study and comparison in identifying the best route options and station locations.

While the WSTC has long supported Sound Transit’s goals of conducting an efficient, cost-effective, and concise process to identify alternatives for study in the EIS, we have grown increasingly concerned as we get deeper into the process. What began in Level 1 with a series of significantly different route and station possibilities – reflecting considerable attention to public input – has narrowed into alternatives that bear very little difference to each other.

Questions left to be studied in the EIS appear to be merely whether or not the guideway runs just to one side of the West Seattle (High) Bridge or the other and is the station better here or just a block further down the same street in one direction or the other. While there is a significant cost impact to going “elevated vs tunnel,” for 1/3 of the route the *only* option is elevated in order to cross the river, and for another 1/3 the comparison is only about how *high* the guideway and station should run through Delridge. This does not seem in the spirit of early outreach and consideration of public comments, and also greatly increases the risks that engineering beyond the current 5% threshold could discover insurmountable construction hurdles or cost impacts in the future that would require us to re-start the process anew.

The WSTC Board believes it is imperative to forward an additional tunnel and elevated option into the Draft EIS process. Many community comments suggest bringing back the Pigeon Ridge/West Seattle Tunnel “Purple Line” or a version of the Level 1 Yancy Street elevated option through North Delridge.

We believe further study of additional alternatives beyond the current Level 3 options might accomplish any or all of the following:

- reduce the need for real estate acquisitions and noise mitigation
- increase train speeds and travel times by reducing or eliminating curves
- avoid impacts to sensitive environmental areas on Pigeon Point and at Longfellow Creek
- reduce impacts to Port operations, which could yield 3rd Party funds to support any increased costs of construction
- reduce impacts to historic buildings, community gathering spaces, and businesses in the economic enterprise nodes within and around Youngstown and the Alaska Junction Urban Village

2. The EIS process must ask the right questions to gather the data that will drive the final decisions made by the Sound Transit Board.

As important as it is to reduce alternatives for study and to help the Sound Transit Board drive to a decision that will reflect budget realities, system considerations, and the “will of the people” at the ballot box, it is also important for the Board to have access to actual data about the costs and impacts of the decisions they will be making.

Therefore, **the WSTC Board believes the EIS *must* study the cost and ridership impacts of deferring one of the three proposed ST3 station locations.** WSTC is not advocating at this time for or against eliminating a station from the line. We are elevating comments by constituents who have called for dropping Avalon Station or truncating the line at Avalon or even Delridge, especially if it helps to reduce negative impacts to the neighborhoods.

As part of both ST1 & ST2 projects, Sound Transit deferred station locations and truncated whole lines approved by voters. Since that precedent has already been established, WSTC is asking the ST Board to gather the data to understand how forecasted ridership, environmental, cost, and other impacts are affected by their eventual decision. Are these data and impacts significant enough to alter what the voters for ST3 envisioned or not? Would building only two stations severely impact ridership or would ridership adjust itself? Can Metro adequately serve all three proposed locations with its future route planning or not? Could the savings from station deferment provide funding to support other changes desired by the community or not? We won't have sufficient answers to these questions if we do not study them.

3. The EIS process must consider disruption during and after construction, and provide suitable mitigation measures for what will be considerable change, including the possible destruction of historical structures and communities along proposed routes.

Sound Transit needs to conduct an analysis and eventually receive a federal determination regarding (a) impacts to environmentally-sensitive green spaces and pedestrian/bike trails in the vicinity of Pigeon Point and North Delridge, and (b) impacts a Genesee alignment might cause as the guideway and columns run along or near the northern property line of a golf course or even just inside it.

Therefore, the WSTC Board recommends further study of the so-called 4(f) impacts to the Seattle Parks and Recreation facilities at the Delridge Community Center & Playfield and the West Seattle Golf Course.

We are not calling for further study of the previous Level 1 alternative which cut across the West Seattle Golf Course, but of additional options for the current alternatives under consideration as engineering continues to advance, including:

- West Seattle Golf Course property line impacts – Beyond considering whether the guideway is at or “just inside” the golf course, what if it was also 25, 50 or 100 feet? How far can the guideway be moved to avoid impacts to the residential neighborhood before it causes irreparable harm to the Golf Course – and more harm than would be caused to the hundreds of residents in the neighborhood north of Genesee?
- A slight deviation of the Level 3 “Blue Line” – What if the guideway remained on Delridge Way SW until the intersection with Genesee and only then began to curve west, crossing the Delridge Community Center property, and possibly requiring acquisition of the existing building or other nearby facilities for a station, before curving back towards an alignment generally along Genesee or just inside the golf course property line as it heads up to the Avalon neighborhood?
 - This would require acquisition of fewer properties, and could dramatically reduce neighborhood concerns about residential displacement.
 - This small change would support repeated calls by the community to push the station as far south into the Delridge neighborhood as possible.
 - This presents an opportunity to provide a significant benefit to a historically marginalized and diverse neighborhood, whereby a brand-new recreational facility could be built (similar to the Rainier Beach Community Center in southeast Seattle), possibly combined with affordable housing or other community benefit facilities. While this would require third party funding and partnership previously outside the scope of Sound Transit’s construction, it also presents a once in a lifetime opportunity to build up Delridge as a community and as a destination, with excellent service from elsewhere across the peninsula by bus or train.

Sound Transit engineers only in the last couple of months developed an option for the Level 3 alternatives that includes the so-called “Orange” or “Yellow” elevated line running across the residential East Alaska Junction Neighborhood. This option was never considered in initial ST3 project development, is not reflective of the ST3 ballot language, and was never shown and discussed in public until the most recent Level 3 public open houses.

While the WSTC supports EIS study of elevated options for West Seattle, this option would destroy an entire area of historic homes and divide a neighborhood in ways similar to the recent Viaduct we took down on the Waterfront or parts of I-5 and I-90 that the City of Seattle is studying for lids.

Therefore, the WSTC Board recommends *removing* this option from further study in the EIS. We also strongly urge Sound Transit staff, as they study the impacts of routing an elevated guideway from the Avalon area into the Urban Village and a north-south alignment suitable for future extension to the south, to conduct extensive and repeated outreach to neighbors in the area.

The WSTC looks forward to working with all of you throughout the Environmental Impact Statement process and beyond. Together, we are committed to helping Sound Transit deliver the elegant solution that will benefit all of the 100,000+ people living, working, and visiting the West Seattle Peninsula for many years to come.

Thank you for the opportunity to comment.

In Community,



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Cc: WSTC Board
Seattle Mayor Jenny Durkan
Seattle City Councilmember Lisa Herbold
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