



Seattle Chinatown
International District
Preservation and
Development Authority

VIA ELECTRONIC MAIL

WSBLE Draft Environmental Impact Statement Comments

c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

RE: Comments on the DEIS for West Seattle and Ballard Link Extensions Project

Dear Ms. Swift:

The Seattle Chinatown International-District Preservation and Development Authority (SCIDpda) is a municipally-chartered public development authority created by the City of Seattle to steward the Chinatown-International District—its public spaces, its small businesses, and its residents. We are a quasi-governmental entity, and are focused on the neighborhood, not an ethnic heritage or political belief. Our board reflects the diversity and range of opinion of our stakeholders, which, like all neighborhoods and communities, cannot always agree on topics, approach, or methods.

Our neighborhood is defined between 4th Avenue to Rainier Ave, and Main Street and Dearborn Ave. We house over 400 residents and 40 neighborhood businesses, and have been doing community development work in the CID for over 47 years. It is from that perspective, expertise, and knowledge that we submit the following comments on the Draft Environmental Impact Statement (“DEIS”) for the West Seattle and Ballard Link Extensions Project (“the Project”), notice of which was issued on January 28, 2022.

We appreciate the opportunity to submit feedback on the DEIS for the project.

MORE ABOUT SCIDPDA and the CID

SCIDpda’s mission is to preserve, promote, and develop the Seattle Chinatown International District (CID) as a vibrant community and unique ethnic neighborhood. Formed by the community in 1975, SCIDpda works to revitalize and preserve the neighborhood by providing services in three areas: affordable housing and commercial property management, real estate development, and community economic development and community engagement. We have over a 45-year success record of increasing neighborhood sustainability through innovative programs and projects that balance development and preservation.

As a neighborhood-based community developer, SCIDpda engages and mobilizes community members to develop collaborative solutions to meet neighborhood priorities—because a community’s strength comes from its members taking the initiative to shape its present and future.

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The neighborhoods that comprise the CID are at an exceptionally vulnerable point in our 100+ year histories. The COVID-19 pandemic, epidemic of anti-Asian incidents, and 2020 protests against racial injustice and police violence disproportionately affected our neighborhood. Ongoing public safety concerns in Seattle and the surrounding region have historically challenged our neighborhood and continue to do so.

Throughout its history, the CID—a place in Seattle where people of color and, especially, the Asian Pacific Islander community were relegated to living—has experienced hugely disruptive public infrastructure projects that have imposed localized and persistent impacts to our community while providing regional benefits. These include:

- The construction of Interstate 5 (which bisected the neighborhood)
- Construction of the Kingdome
- The SR99 Deep Bore Tunnel
- First Hill and Center City Connector Streetcars
- Seawall, Seattle Waterfront and, demolition of the Alaskan Way Viaduct
- Utility upgrades

The CID has a long history of cycling through disruption caused by public infrastructure construction. Each time this happens, the CID works through disruptions and recovers, only for the cycle to begin again with the next infrastructure investment. As stewards of the neighborhood, SCIDpda has advocated directly to the City of Seattle, Sound Transit, and King County (along with partners) to review past outreach outcomes to understand what community members have identified in the past 20 years about our interests, needs, concerns, and priorities. The City, Sound Transit, and King County have agreed to incorporate many of these interests, needs, concerns, and priorities into future projects and plans that affect our neighborhoods—including this Project. These priorities include:

- Retain or increase community ownership of properties
- Acknowledge and address historic racism that has and continues to impact the CID
- Increasing connectivity to surrounding neighborhoods.
- Minimize cumulative harm to and displacement of existing businesses, residents, and nonprofits
- Support a thriving, placed-based small business economy during the WSBLE construction and beyond
- Enhance the public realm (streets, alleys, public spaces, etc.) in and around the

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station area

- Enhance public health and well-being

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It is through the combined perspectives of our mission and values, our experience and history, and these listed priorities, that we offer the following comments and perspectives about the alternatives and impacts described in the WSBLE Draft EIS.

A. Impacts of Fifth Avenue Alternatives are existential for the Chinatown-International District

The DEIS describes and compares the impacts of the Fourth and Fifth Avenue alternatives. After carefully considering the DEIS analyses, we conclude that the impacts of the Fifth Avenue Alternatives would put many of the community priorities outlined above at great risk. Unless Sound Transit can substantially minimize the construction effects or identify another option that moves the construction impacts away from the cultural spine of the Chinatown-International District, we do not believe the Fifth Avenue Alternative and options are acceptable. The mitigation discussed is inadequate to address the totality of the impacts.

Construction of the Fifth Avenue Alternatives would be the most disruptive in the very heart of the Chinatown-International District. Construction would close key streets for commercial and cultural activity, including King Street and Weller, for long periods, affecting access to retail businesses for customers and suppliers. Construction would create noise, dust, truck traffic, and visual impacts that would hamper or prevent community gatherings and activity in Hing Hay Park and other outdoor spaces, and affect quality of life for residents of buildings such as Uwajimaya Village, Fujisada Condominium, Publix Building, Bush Hotel, and the Alps Apartments—many of whom are seniors or living with disabilities. Construction of this alternative would permanently displace on-street parking, which is of particular importance to the retail and small business environment in the Chinatown-International District. Fundamentally different construction plans need to be developed to vastly reduce the impacts. With the current construction plans, no amount of mitigation can reduce the impacts to tolerable levels.

While the potential opportunity for transit-oriented development (TOD) associated with the massive disruptions created by the Fifth Avenue alternative and options may be enticing, after years of bisection and displacements from transportation facilities, exposure to degraded air quality through transportation planning and zoning policies, and now recovery from renewed racialized violence and vandalism, the amount of impact imposed on the CID is difficult if not impossible to put a mitigation price tag on. Sound Transit would have to find ways to further minimize the impacts described or identify other options that move construction away from the cultural spine of the Chinatown-International District. Further minimization is required before we could even begin to value the substantial mitigation required to construct in these alternatives. The community would need assurance that community ownership would be prioritized in any TOD opportunity associated with the project. Ensuring community ownership will be critical if the project is to reduce—not exacerbate—the

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CID community's risk of gentrification and displacement. These measures *must* be in the form of explicit legal commitments; the promise of a TOD opportunity alone is not sufficient mitigation or incentive to support a Fifth Avenue alignment.

B. Impacts and benefits from Fourth Avenue alternatives are not equally addressed

The construction of either of the Fourth Avenue alternatives would result in major traffic pattern changes that would have a damaging impact on the CID community. DEIS Section 3.19.3.1 (Arterial and Local Street Operations) states that throughout the six-year closure of 4th Avenue South, a high volume of north-south traffic would be diverted through CID neighborhood streets—resulting in increased levels of traffic congestion. Understanding the disruptive impact of more than nine years of construction on local traffic is critical, but it is not the only important impact that the community needs to consider.

The DEIS assessment fails to account for the environmental health impacts that this increased traffic congestion would have on the neighborhood. These impacts include (but are not limited to): increased noise levels, increased exposure to automobile exhaust, and increased risk of pedestrian injuries and property damage caused by automobile crashes. The DEIS also fails to account for the disruptive impact that such an increase in pass-through traffic would have on the neighborhood's economic vitality, including making street parking more difficult and disrupting economically important community events that require street closures. A more thorough study of both the environmental and economic impacts of the extended closure of Fourth Avenue South is required for the community to accurately compare it with other alternatives.

The DEIS also falls short of identifying any meaningful mitigation strategies to address project impacts. Without understanding how Sound Transit intends to minimize and mitigate impacts, it is difficult to provide meaningful feedback about preferences. In addition to providing more information about the impacts we reference in this letter, Sound Transit must propose appropriate mitigation measures to address impacts associated with the Fourth Avenue alternatives so that the community can weigh the alternatives and their benefits, impacts and mitigation strategies, against our own community priorities.

The Fourth Avenue alternatives would have direct connections to both Pioneer Square and Chinatown-International District neighborhoods and would facilitate more direct connections between transit modes such as Sounder, Light Rail, Amtrak and private buses. The Jackson Hub concept plans, as well as the community priorities listed in the beginning of this letter, state both neighborhoods' advocacy for improving connections between the neighborhoods, improving the public realm, and activating the Jackson Hub area more intentionally. From our review of the information presented in the DEIS, there appear to be opportunities to realize long-held community goals and regional benefits from a Fourth Avenue alignment, but the analysis lacks the information decision makers and the public need to further understand these opportunities. For example, no formal visual quality analysis was performed for alternatives in the CID segment and there was no discussion of the

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Chinatown-International District and Pioneer Square as complete, cohesive, and interconnected neighborhoods. An actual visual quality analysis, complete with images and discussion, would allow decision makers and the public to see how station entrances and improvements along 4th Avenue South between S. Jackson Street and Seattle Boulevard would contribute to public realm goals. More visual representation of the scope and scale of proposed tunnel ventilation facilities for both Fourth Avenue and Fifth Avenue alternatives would aid in better understanding of impacts to the public realm. The proposals would have a significant disruptive impact if they are constructed according to the dimensions described in ‘Appendix J Conceptual Design Drawings – Ballard Link Extension’.

A more meaningful analysis of visual impacts also should lead Sound Transit to discuss opportunities to enhance connections and cohesiveness between the two neighborhoods in the Social Resources, Community Facilities, and Neighborhood conclusions. Without a more formal analysis, beneficial impacts of the proposed project and alternatives are not explicitly disclosed and are hard for the reader to conclude.

C. The Deep Options do not support a 100-year vision for our neighborhoods

We do not see the deep options as viable. Elevator-only access and long transfer times will not be able to keep up with crowds during major events in the area (e.g., football, soccer, or baseball games or Lunar New Year). Elevators are expensive to maintain and often break down, as has been our community’s experience within the Sound Transit network. Elevators will also not be viable if there is another global pandemic that makes it practically unsafe to ride in an elevator with other members of the general public. We are also deeply concerned that requiring access via elevators may deter most people from disembarking or transferring at the CID station. Foot-traffic is essential to maintaining vibrancy and economic opportunity for the CID and its businesses.

We recommend removing the deep options as alternatives going forward.

D. The adverse effects indicated in the DEIS do not reflect the true impact to our communities

While Sound Transit and the City of Seattle have publicly committed to equity in the project process and applying the Racial Equity Toolkit throughout, the Draft EIS has some glaring holes in the analysis that must be addressed.

Sound Transit performed neither an operational noise analysis nor a visual quality analysis for the Chinatown-International District neighborhood. While the methodology sections give plausible technical reasons for this approach, those rationales are inadequate. Considering the project context and the focus on race and social justice for this project, the omitted analyses are vital to inform other analysis within the EIS. Without a noise and visual quality analyses, the Environmental Justice analysts concluded “no impact” when in all reality, there was “no analysis.” This lack of information served to underestimate the impacts for all the CID segment alternatives and paint a picture of impact minimization that simply is not true.

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The Environmental Justice analysis acknowledges cumulative harm caused by decades of public infrastructure projects sited and constructed without centering the voices of people of color—but then fails to account for that cumulative effect and harm in the actual analysis. The Environmental Justice conclusion of no disproportionately high and adverse impact (Appendix G, Table 5-4, pages 5-31 through 5-66) further minimizes the true effect on our community.

This is representative of the findings provided in many of the Draft EIS analyses—no analysis in a few key disciplines led to “no impact” conclusions, which we believe lends to the overall inadequacy of the Draft EIS. For specific comments about the analysis, and to see our concerns described in more detail, please refer to the accompanying attachment to this letter titled “Discipline and Issue-Specific Comments on the Draft EIS.”

Finally, there is growing concern that losing buildings within the Seattle Chinatown Historic District boundary that are considered “contributing” to the historic character of the neighborhood, will erode the very historic and cultural fabric we have struggled to maintain. Losing a contributing historic building within the historic district protected under Section 106 of the National Historic Preservation Act appears to be a serious impact—one that is potentially unmitigable. Sound Transit did not propose any mitigation for the loss of historic structures in the district, and did not suggest any strategies for minimizing impacts to the historic district resulting from construction. Mitigation strategies need to be discussed with the community and consulting parties as soon as possible, and those conversations must not be delayed until publication of the next environmental document.

E. Conclusion and Recommended Path Forward

We recognize the need to keep this project moving forward and to facilitate delivering the full ST3 program for the benefit of all regional users. We also recognize that the longer this environmental process takes, the more expensive things can get, and the longer it takes to find the additional resources needed to deliver on the promises made to voters. The environmental process will take as long as it has to in order to get the right results for these once-in-a-generation infrastructure opportunities. But it is in the spirit of continuing to advance the project while also advocating for our communities that we suggest the following path forward.

Based on our review of the information provided in the Draft EIS, the Fourth Avenue shallow alternative is the least impactful option for the CID. We recommend that Sound Transit follow the close of the DEIS comment period with advance design and study of the Fourth and Fifth Avenue shallow alternatives (CID-1a and 2a diagonal) with the goal of further minimizing the cost, the time, and area needed for construction and the impacts. Once complete, we recommend Sound Transit engage the community in discussion well before the Final EIS about the findings from this study effort. The attachment to this letter includes a list of issues and recommended directions for study, but we also encourage Sound Transit to take the initiative to find solutions in areas we have not yet commented on. We are not engineers, and we don’t claim the skills required to address the full scope of engineering challenges this

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project faces—but we do know that this region has the technical talent available to tackle the challenges.

By focusing time and resources only on the shallow alternatives, Sound Transit can develop the information needed by the community to support future selection of a preferred alternative. We cannot overstate the importance of Sound Transit providing the additional information requested in this comment letter prior to formal publication of the FEIS. This information will be necessary for SCIDpda and the CID community to support a project that facilitates much needed high-capacity regional transit, transit connectivity, and serves to enhance our neighborhood. The information can help frame up subsequent mitigation conversations, a topic that many in government appear anxious to advance.

Thank you for the opportunity to provide comments on the Sound Transit WSBLE DEIS. We strongly urge Sound Transit to work closely with the City of Seattle and King County to more fully explore strategies for reducing the costs and impacts associated with the three shallow alternatives before coming back to the CID community for further discussion.

Sincerely,

Mindy Au

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Attachment to SCIDPDA DEIS Comment Letter

April 25, 2022

Discipline and Issue-Specific Comments on the
Sound Transit West Seattle and Ballard Link Extensions Project Draft EIS

1. Inconsistencies between Racial Equity Toolkit and DEIS: The Racial Equity Toolkit commits to an outcome of limiting harmful impacts of the Project and working with impacted communities to identify opportunities to repair past harm. It acknowledges the cumulative harm caused by decades of public infrastructure projects sited and constructed without centering the voices of people of color. Yet while the Environmental Justice analysis references these impacts in the narrative, it does not include the documentation of the analysis that led to an Environmental Justice conclusion of no disproportionately high and adverse impact (Appendix G, Table 5-4, pages 5-31 through 5-66).

These cumulative impacts are a key concern for many residents and business owners in the Chinatown-International District, and they should be explicitly considered as part of the Environmental Justice analysis.

2. Consideration of noise impacts is insufficient: The Noise and Vibration Technical Report states the following: "Commercial and industrial districts are in the Chinatown-International District Segment... Although there are no nearby residential districts near the segment there are mixed use properties with residences in commercial districts, such as Uwajimaya and the Publix Hotel. Residential use properties within commercial districts are treated the same as commercial properties within the city of Seattle." (Appendix N.3, page 6-37)

While this may be acceptable by federal noise analysis standards, it is unacceptable from a racial equity standpoint. Sound Transit should conduct a complete operational noise analysis of impacts to residential properties—regardless of whether they are part of a mixed-use building—and commit to mitigation for those impacts.

3. Inadequate consideration of impacts of stadium events in Transportation analysis: The analysis did not include stadium events in the traffic or ridership analysis, despite acknowledgment that stadium events for three sports teams occur more than one third of the year and concerts and other large events occur between sports events. During scoping of the Project, partner neighborhoods in historic south downtown requested that Sound Transit explicitly include stadium events in the analysis as a baseline condition. Sound Transit should include this consideration in its analysis of baseline conditions in the Final EIS.

4. Underestimation of the impacts of parking losses: The Cumulative impacts section of the DEIS asserts that changes to the transit system would reduce the need for parking in the study area. It further states that "the project would remove some of the residential and commercial land uses that created demand for this parking." (DEIS, page 5-7)

We believe this conclusion is inappropriate without further consultation with Chinatown-International District and Pioneer Square residents and small business owners. In the Chinatown-International District, for example, feedback from community leaders indicate that short-term parking (on-street, <2 hour) is used by people making trips to the Chinatown-International District to shop, visit residents, dine in a restaurant, drive a senior resident to/from appointments, etc. Transit may not be an appropriate or reasonable alternative mode for many of these trips. We urge Sound Transit to conduct further public engagement on this topic and update its analysis in the final EIS to reflect the true impacts of parking losses—particularly on-street parking—for our communities.

5. Mis-characterization of “offsetting benefits” in Environmental Justice analysis: The U.S. Environmental Protection Agency and Federal Transit Administration permit agencies to consider “offsetting benefits” when drawing a conclusion about whether a project has a disproportionately high and adverse impact on environmental justice populations. To count as an offsetting benefit, however, the positive effect needs to disproportionately benefit the affected populations. According to the Environmental Justice analysis, Sound Transit considers better access to transit and job centers to be an offsetting benefit for the residents of the Chinatown-International District. We disagree.

The new light rail station in the Chinatown-International District will enhance a regional transit hub, connecting people from all four corners of the region with buses, commuter rail, and Amtrak. While residents of the Chinatown-International District will partake of this benefit along with everyone else in the region, they will not gain substantially more benefit than anyone else in the region. On the other hand, they will bear the brunt of the impacts of constructing and operating this facility. Consequently, we do not believe it is appropriate to consider access to transit and job centers to be an offsetting benefit.

6. Inconsistency in use of high-cost and low-cost project assumptions: The technical analyses in the DEIS do not use the same high-cost and low-cost project assumptions. For example, the Economics analysis of the DEIS (pages 4.3.3-1 through 4.3.3-13) indicates that Sound Transit used CID-2a for both the high and low-cost project value to estimate the number of job years (employment) and direct expenditures resulting from the Project. Elsewhere in the economics analysis, CID-1a is listed as the high-cost project alternative in the CID segment. This results in an apples to oranges comparison of benefits generated from employment and local revenue. Similarly, in the Air Quality analysis of the DEIS, "CID-1a" is used as the alternative evaluated for Air Quality standards (page 4.3.6-3), but on page 4.3.6-7, the "low-cost scenario includes CID-2a..." and the "high-cost scenario includes CID-1a.". These differences result in markedly different Greenhouse Gas emissions, again resulting in an apples to oranges comparison. Sound Transit should update its analyses in the Final EIS to address these inconsistencies.

7. Need for more clarity on construction footprint: The DEIS discloses the approximate amount of area necessary for construction staging areas and easements, but does not show a construction footprint outline. The property impact maps provided in Appendix L.4 do not indicate how the properties would be used or the extent of the use (i.e., full or partial

acquisitions). Without more clarity on construction staging locations or the assumptions of property impacts for construction staging, decisionmakers and the public cannot adequately assess or compare the impacts of construction to the Chinatown-International District.