

April 26, 2022

WSBLE Draft Environmental Impact Statement Comments
c/o Lauren Swift
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Submitted via email to WSBLEDEIScomments@soundtransit.org

Re: Mercer Stakeholder Comments on the Denny, South Lake Union, and Seattle Center/Uptown Stations – WSBLE Draft Environmental Impact Statement

Dear Ms. Swift,

The Mercer Corridor Stakeholders Group (Mercer Stakeholders) write you in response to the West Seattle and Ballard Link Extension (WSBLE) Draft Environmental Impact Statement (DEIS) with a particular focus on the Denny, South Lake Union, and Seattle Center/Uptown stations.

The Mercer Stakeholders represent transportation interests on behalf of neighborhood organizations, non-profits, residents, major employers, and small business owners in the South Lake Union, Uptown, and Denny Triangle neighborhoods. Originally formed to shape the redesign of the Mercer corridor in 2006, Mercer Stakeholders have played an influential role in bringing together coalitions and acquiring federal grants for pivotal transportation projects that move people through downtown Seattle and our region.

Since its inception, the Mercer Stakeholders have played an important role in shaping the alignment and advocating for the passage of Sound Transit 3 (ST3). Prior to the ballot initiative in 2016, a study conducted by the Mercer Stakeholders found that three north downtown stations (Denny, South Lake Union and Seattle Center/Uptown) were critical to support future density and growing transit ridership. The study estimated that planned developments would bring more than 60,000 jobs to north downtown— enough to fill more than eight Columbia Centers. Much of this growth has been realized and even more is on the way. The development of these light rail stations remains critical for meeting our region’s collective goals for sustainability, equity, and economic prosperity.

To realize the vision, we applaud the careful decision-making of regional leaders to ensure the most appropriate route alignment and station locations are selected, and that deliberate measures are taken to minimize construction impacts during the 11+ years of WSBLE construction. As such, the Mercer Stakeholders make the following

comments regarding ST3 planning and the preferred alignment for the Denny, South Lake Union, and Seattle Center/Uptown station areas.

Denny Station

Request: Study the alternative station location at Terry Avenue with a connection to the Harrison Street South Lake Union Station alignment and maintain Westlake Avenue operations during construction due to its function as the primary transit spine through South Lake Union. Provide a robust transit plan for any station alternative.

The Denny Station must accommodate the growing residential population and employment base in north downtown while allowing the transportation and transit network to function during construction.

South Lake Union is unique in that more employees in this neighborhood take transit to work than almost any other neighborhood in Seattle or the region. According to Commute Seattle, more than 67% of employees arrive at work by a means other than drive-alone trips. Many critical transit routes depend on Westlake Avenue, which has a dedicated transit lane and currently supports the South Lake Union Streetcar. The DEIS states that construction of the Denny Station at Westlake and Denny would fully close Westlake for four years and cause additional closures to bus corridors on Blanchard and Lenora. This simply is not viable.

According to Table 4-39 of the DEIS Transportation Technical Report, portions of Westlake Avenue already operate at a Level of Service (LOS) F. If Westlake Avenue closes, this congestion will make traffic in the surrounding street network much worse. Also, because Denny Way is where the grid shifts, there are few continuous arterials that connect from south of Denny Way to north of Denny Way making it very difficult to effectively detour transit routes that now use Westlake Avenue N.

What's more, closure of Westlake Avenue would halt the operations of the South Lake Union Streetcar, which connects Lake Union to downtown and soon further to Pioneer Square and First Hill. Pre-pandemic, the South Lake Union Streetcar carried more than 500,000 passengers per year. The DEIS does not identify any comparable detour routes nor transit mitigation measures. The DEIS notes that the South Lake Union Streetcar could potentially run in separate segments. This is not tenable, and any interruption would disrupt a major opportunity to mitigate the significant transit impacts of the WSBLE project.

The Terry Avenue station location warrants serious consideration as it avoids the disruptions to the South Lake Union Streetcar and bus transit on Westlake Avenue and provides opportunity for an expansive light rail station with adequate pedestrian space. Table 4-42 of the DEIS Transportation Technical Report indicates the Terry Avenue station would generate the same ridership as the Westlake Avenue station for

transit and pick-up/drop-off trips. The difference in number between “walk and bike” trips seems unlikely to differ significantly between the Denny Station alignments because they are relatively close to one another. This should be further analyzed in the Final Environmental Impact Statement. Additionally, the surrounding crosswalks and pedestrian facilities are noted as adequate for the Terry Avenue station location, while the Westlake Avenue and 9th Avenue intersection is expected to operate at a LOS F, indicating a better pedestrian experience at the Terry Station. (See pg. 6-40 and 6-41 of the DEIS Transportation Technical Report.)

If the Westlake Avenue station location is carried forward for consideration, Sound Transit must go back to the drawing board and study alternative construction methodologies that minimize closures to Westlake Avenue and provide commensurate transit routes and traffic detour alternatives.

Comment 1: To advance the Denny Station, Sound Transit must:

- a. Study a mix-and-match approach that considers the Terry Avenue station as part of the preferred alignment, connecting to the Harrison Street station.
- b. Study alternative construction methodologies that minimize impacts to Westlake Avenue and Denny Way.
- c. Prepare a detailed transportation mitigation plan that provides commensurate transit capacity and vehicle throughput in lieu of any closed corridors.
- d. Prepare a business access plan that minimizes construction impacts to loading docks, parking garage entrances, and building entrances.
- e. Build new streetcar tracks before ST3 construction commences to eliminate any operational disruptions to the South Lake Union streetcar and avoids impacts to the future Center City Connector.

South Lake Union Station

Request: Advance the Harrison Street station by exploring alternative construction approaches that limit closures. Analyze adequate traffic needs and prepare a robust mitigation strategy that includes expanding capacity on adjacent corridors like Denny Way and John Street.

The South Lake Union Station must serve the heart of the neighborhood and provide critical transit connections between the Harrison transit corridor and north-south bus routes on 7th Avenue (SR 99 ramp connections) as well as Dexter and 5th Avenues. The alternative station location on Mercer Street is outside of neighborhood boundaries and located farther from major transit routes. The Mercer Street station is isolated from the South Lake Union neighborhood by both Mercer Street and SR 99, making it a dangerous and inconvenient location for pedestrians and transit riders. Additionally, as noted in Table 4-35 of the DEIS Transportation Technical Report, Mercer Street has an average daily traffic volume of 18,100 to 35,000 trips. The Mercer Stakeholders group strongly opposes even a partial closure of Mercer Street. The recent

investments in this corridor are too important, and we do not support a Mercer Street station in South Lake Union.

Comment 2: To advance the South Lake Union Station at Harrison Street, Sound Transit must:

- a. Study alternative construction mitigation techniques that minimize the geographic footprint of construction and minimizes road closures.
- b. Prepare a robust detour plan with adequate detour routes on Denny and John Street, that provide commensurate access to SR 99.
- c. Maintain open sidewalks and a comprehensive pedestrian access plan through the construction area.
- d. Prepare a business access plan that minimizes construction impacts to small business, customer-facing businesses, loading docks, and building entrances.
- e. Prepare a comprehensive study of Harrison Street and final design that better connects pedestrians and vehicles across SR 99 and along the entire corridor from 5th Avenue to Westlake Avenue.

Seattle Center/Uptown Station

Request: Study alternatives to the Republican Street station location and a mix-and-match approach that connects to the South Lake Union Station at Harrison Street. Avoid impacts to Mercer Street.

The Seattle Center/Uptown Station must serve the Uptown neighborhood, the arts and culture organizations of Seattle Center, as well as the 12 million patrons of Seattle Center events and activities without causing irreparable harm to the organizations that exist today. These organizations have raised strong concern that the construction activities, including impacts from noise and vibration, threaten their existence.

Sound Transit must consider other station locations that are not immediately adjacent to the Seattle Center's Northwest Rooms (Republican Street) or Seattle Rep. A Seattle Center/Uptown Station must also not extract land from Seattle Center, which is otherwise used for events, cultural celebrations, and recreation. Alternative station locations must avoid significant impacts to Mercer Street operations and connect back to the preferred alignment and the Harrison Street station.

Comment 3: To advance the Seattle Center/Uptown Station, Sound Transit must:

- a. Study alternative station locations that minimize impacts to Seattle Center grounds and organizations and connect to the preferred alignment at Harrison Street station.
- b. Study the impacts of specific construction activities on the unique and vulnerable uses at Seattle Center. Propose adequate noise and vibration mitigation.

- c. Prepare and execute a robust marketing strategy that attracts visitors to Seattle Center organizations and businesses during construction.
- d. Analyze adequate detour routes and prepare a detailed access plan specific to Seattle Center that considers traffic mitigation and maintains transit ridership and access during the years of construction.
- e. Study alternative construction mitigation techniques that minimize the geographic footprint of construction and minimizes road closures.
- f. Prepare a robust detour plan with adequate detour routes on Mercer, Queen Anne Avenue and 1st Ave N, which are heavily trafficked streets for residents of both Queen Anne and Uptown.
- g. Ensure the above streets have adequate access for the large amount of traffic flowing in both directions and several lanes.
- h. Maintain open sidewalks and a comprehensive pedestrian access plan through the construction area throughout the construction period.
- i. Prepare a business access plan that minimizes construction impacts to all businesses, customer-facing businesses, loading docks, and building entrances.
- j. Prepare a comprehensive study of all three streets and develop a final design that better connects pedestrians and vehicles along this stretch from Queen Anne Avenue to Seattle Center and along Mercer Street.

Additional Information & DEIS Inadequacies

The Mercer Stakeholders appreciate the extensive research conducted by Sound Transit, the City of Seattle, King County Metro, and other partner agencies as part of the WSBLE DEIS. However, more information is necessary to understand the true impacts of WSBLE construction:

Comment 4 - Road Closures & Detours: The DEIS provides some information pertaining to road closures but the analysis leaves out information about most closures less than one year (See Section 3, Table 3-30). In addition, detour routes are suggested for some closures, but not others. The full network of road closures, detours, and durations must be analyzed. It is improper to ignore closures of shorter durations and study each segment in a silo. The DEIS also does not analyze the full traffic volumes and patterns that must be mitigated as part of the decade-long construction window, nor does it analyze capacity and impacts during surge events. This information is necessary to understand the full impacts during construction and to prepare plans for mitigation.

Comment 5 - Construction Methodology: The DEIS proposes only one construction technique (cut-and-cover) for each station in north downtown. It is unclear how specific methodologies were selected and why, or if other less impactful construction means may be possible. Sound Transit should study the possibility of constructing the Denny, South Lake Union, and Seattle Center/Uptown stations via means other than

cut-and-cover and weigh the trade-offs with alternative approaches. This may include consideration of mined stations and other creative approaches.

Comment 6 - Pedestrian Impacts: The DEIS analysis for pedestrian impacts is lacking across all segments. Pg. 6-47 of the DEIS Transportation Technical Report notes that “the Ballard Link Extension Build Alternatives could close sidewalks or reduce the sidewalk width within the construction areas along the impacted roadways...,” however, the DEIS does not contain any detailed information about the location or duration of sidewalk closures. This analysis must be included in the Final Environmental Impact Statement. Information about sidewalk closures is critical to evaluate the impacts of different alternatives and provides critical data necessary to inform the analysis of anticipated business displacements.

Comment 7 - Construction Sequencing: The DEIS identifies an 11-year construction window, but it does not specify the timing for each station or concurrent construction activities. Before finalizing the alignment, Sound Transit should study and disclose the estimated construction sequencing to better understand the impacts of WSBLE construction.

Comment 8 - Cumulative Impacts: The DEIS appears to study construction impacts and road closures in isolation from one another. These construction plans must be studied as concurrent actions in order to understand the cumulative impacts of construction and mitigate appropriately.

Construction Management Planning

Construction of the ST3 network in downtown Seattle will be the largest infrastructure project in Seattle’s history. More work is needed to ensure that we maximize this opportunity to connect our region while minimizing the undue harm to communities, businesses, and our transportation network during the 11+ years of WSBLE construction. While construction activities may be temporary, their impacts may cause lasting harm. We believe we can build one of the largest light rail expansion projects in the country while preserving the health and vibrancy of downtown Seattle, but more work is needed before finalizing the alignment and construction plans.

Comment 9 - We request that Sound Transit and its partners prepare a detail construction management plan that includes:

- Establishing a Construction Coordination Committee for north downtown comprised of South Lake Union, Uptown, and Seattle Center representatives and working with the committee to develop a plan to minimize construction impacts.

- Avoiding impacts to transit, especially fixed rail transit or bus service with no adequate detour route. Providing additional transit service in areas acutely impacted.
- Providing assistance to employers that encourages and facilitates transit ridership.
- Establishing requirements for maintaining access to venues and businesses in construction contract documents.
- Developing a communications plan to inform patrons, businesses, employees, and local residents of alternative route options. Providing real-time and advance-notice information on traffic movement, detour routes, and access.
- Providing mitigation measures for business impacted in Uptown.
- Implementing public education measures and creative marketing ideas that promote access and attractiveness of venues and businesses.
- Defining appropriate freight routes to accommodate large trucks and proactively communicating changes to street and route access.
- Providing clear wayfinding signage to help pedestrians safely and effectively navigate construction.

We appreciate your commitment to this important endeavor and look forward to working together as we deliver the West Seattle and Ballard Link Extensions.

Sincerely,

Members of the Mercer Corridor Stakeholders Group

Danah Abarr
Executive Director
SLU Chamber

Howard Anderson
Chair
Denny Triangle Neighborhood Association

Maria Barrientos
Co-Chair
Uptown Land Use Review Committee

Cary Clark
Partner- Owner
Argosy Cruises

Michael Cohen
Managing Director
Madison Marquette

Jacqueline Dupuis
Interim Executive Director
SIFF Cinema | SIFF international Film Festival | SIFF Education

Jim Falconer
Co-Owner
The Vance Corporation
The Tower Building
The Times Square Building

Mercedes Fernandez
Co-Chair
Uptown Land Use Review Committee

Deborah L. Frausto
Deborah L. Frausto LLC
15-year Uptown resident/small business-owner

Ada Healey
Chief Real Estate Officer
Vulcan LLC

Rick Hooper
Chair
Uptown Alliance

Sara Lazkani
Public Policy and Community Engagement
Manager, Northwest
Meta

Shawna McMahon
President
South Lake Union Community Council

Chuck Nelson
President & CEO
WASHINGTON ATHLETIC CLUB

Molly Schlobohm
President/COO
Argosy Cruises

Jon Scholes
President and CEO
Downtown Seattle Association

Rachel Smith
President and CEO
Seattle Metropolitan Chamber of
Commerce

Jane Zalutsky
Executive Director
Seattle Center Foundation

Ian M. Goodhew
Head of Government Relations, PNW
Google

Jeffrey Herrmann
Managing Director
Seattle Rep

Mark Houtchens
Co-Owner
The Vance Corporation
The Tower Building
The Times Square Building

Alexis Lee
Executive Director
MUSEUM OF POP CULTURE

Neha Nariya
Co-Founder
Civic Hotel

Von Perkins
Principal
PCMCLLC

John Schoettler
Vice President, Global Real Estate &
Facilities
Amazon

John T. Slattery, PhD
Vice Dean, Research and Graduate
Education
UW Medicine

Marjorie Thomas
CFO
Allen Institute