

March 28, 2019

City of Seattle members of the Sound Transit Elected Leadership Group:

We are pleased to offer our comments and recommendations on the Chinatown/International District (C/ID) and Delridge stations associated with the Sound Transit West Seattle and Ballard Link Extensions project. We are grateful that the Elected Leadership Group has dedicated additional discussion to these two individual stations, and we appreciate the opportunity to provide our feedback to help inform that dialogue.

The Commission feels strongly that these two station areas particularly warrant additional race and social equity analysis. The Chinatown/International District and Delridge communities have both experienced historic and continued inequities. 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 these neighborhoods due to the cumulative effect of the negative impacts they have already experienced. We are encouraged that the City of Seattle has partnered with Sound Transit on the application of the Racial Equity Toolkit on this project. The Commission recommends continued partnership and rigorous assessment of all racial equity impacts. The planning process should optimize the hundred-year plus benefits of this transit infrastructure while minimizing any potential disproportionate short- and long-term impacts to the affected communities.

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 transit investments will likely lead to land use changes and increased density around these two stations. The study and eventual selection of light rail alignments and station locations in these communities 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, particularly for the C/ID station area, 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.

We offer our detailed comments and recommendations on the C/ID and Delridge stations below.

Commissioners

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## Chinatown/International District

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. Design and construction activities at this location should consider impacts on local populations, businesses and cultural activities.

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. Cut-and-cover construction at this location would have short- and long-term impacts including significant disruption to local businesses; property acquisitions for purposes of construction, staging, and ancillary facilities; and displacement of Metro bus routes. 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 Environmental Impact Statement (EIS). 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. A station at this location could also:

- Provide the opportunity to re-create 4th Avenue S as a multi-modal corridor;
- Improve the 4th Avenue S/S Jackson Street/2nd Avenue Extension S triangle to be more pedestrianfriendly; and
- Realize the potential of Union Station as a vibrant regional multi-modal hub, with placemaking opportunities including local business, historic, and cultural enhancements.

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.

The Commission believes that the C/ID station will serve as both a critical integrated transit hub and the principal gateway to the city for travelers using it. As such, this location mandates the necessary investment to make it easily accessible and intuitive to navigate for all users. The historic Union and King Street Stations can serve as anchors for a broad community and economic development effort while linking the C/ID and Pioneer Square neighborhoods. The local community has already initiated a conversation about the future vision for this area designated as the Jackson Hub. Community partners including Historic South Downtown, the Alliance for Pioneer Square, and Seattle Chinatown/International District Preservation and

Development Authority have developed preliminary urban design concepts for the Jackson Hub. The City's Imagine Greater Downtown project has also included Jackson Hub as one of its "Big Ideas." The Commission encourages the continued development of these early concepts and their integration with Sound Transit's planning efforts for a new light rail station in the C/ID.

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.

## 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. All Delridge station location alternatives should provide opportunities for equitable transit-oriented development, access to community amenities, and seamless transit connections. As a result, the Commission recommends the Representative Project alignment in this neighborhood be removed from further consideration. The proposed station location in this alternative is farthest from the neighborhood core, reducing potential ridership and making multi-modal connections more difficult. We recommend the West Seattle Tunnel and West Seattle Elevated alternatives be included for additional study in the EIS.

The Commission has significant concerns about the potential for displacement in this neighborhood. We have requested Sound Transit conduct a rigorous analysis to identify and minimize, if not avoid, commercial and residential displacement resulting from guideway and station construction. We also have requested an assessment of the potential for affected property owners to relocate within the same area.

The Commission supports alternatives that would result in a lower elevated guideway through the Delridge neighborhood. The high guideways and 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. We have recommended Sound Transit study the visual impacts and access challenges at this location using extensive eye-level digital modeling of the proposed alternatives.

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,

Michael Austin

Chair, Seattle Planning Commission

cc:

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