



March 5, 2018

Board Chair Dave Somers
West Seattle and Ballard Link Extensions
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

VIA EMAIL: wsblink@soundtransit.org

Re: West Seattle and Ballard Link Extensions Early Scoping

Dear Board Chair Somers,

Thank you for the opportunity to provide early scoping comments to start the project development and environmental process for the West Seattle and Ballard Link Extensions. The nexus between Port of Seattle and Northwest Seaport Alliance operations and the project's representative alignment is significant, thus we look forward to being a close partner on this critical new infrastructure. Through construction and subsequent operations, this project has the potential of impacting many port facilities:

- Fishermen's Terminal
- Interbay/Magnolia cruise and fishing terminals (Terminals 90 and 91)
- Terminals 5 (adjacent to West Seattle)
- Terminal 18 (Harbor Island)
- Salmon Bay Marina (adjacent to Fishermen's Terminal)
- Old Tsubota Steel site (near Magnolia Bridge)
- Grain terminal (Terminal 86)
- Terminal 46 (near Coleman Dock)
- Terminals 30 and 25 (south of T-46 and north of Spokane St)
- Terminals 102, 104 and 106

In 1911, King County citizens created the public Port of Seattle – ensuring that harbor facilities were managed for the benefit of all citizens not just a privileged few. Today that responsibility extends from Fishermen's Terminal to Sea-Tac Airport and includes the Northwest Seaport Alliance, a marine-cargo operating partnership of the Port of Seattle and Port of Tacoma.

We are responsible for creating good jobs across the state by advancing trade and commerce, promoting manufacturing and maritime growth and stimulating economic development. To be successful in that mission, it is critical that other jurisdictions and government agencies like Sound Transit recognize the complicated nature of our operations and collaborate closely when major projects might impact our assets.

Over the past two decades, the Port has invested almost \$500 million our region's transportation system supporting partners' projects such as Sound Transit. Our collaboration with Sound Transit included construction (and the extension) of Link Light Rail at Sea-Tac Airport. We strategized for the Sounder rail start-up and ensured the Eastside Rail Corridor remained in public ownership. Overall, we fundamentally support high capacity transit ridership to reduce transportation congestion.

As we have shared in previous letters to Sound Transit, we have three primary objectives for Sound Transit 3 projects:

1. Enhance service to Sea-Tac Airport for passengers and employees, from a web of cities throughout the region;
2. Strengthen access to Port facilities, both existing and future developments; and
3. Improve regional transportation for personal mobility, while protecting maritime and industrial land uses and freight mobility.

With respect to the West Seattle and Ballard Extensions, those second two objectives are critical. We appreciate Sound Transit's new approach to project development and broader stakeholder engagement. However, given the route of the current representative alignment, we are concerned about the possible significant impacts to the region's maritime and industrial sectors because of this project. Moving forward, we look forward to integral involvement in defining the project's preferred alignment and appreciate Sound Transit staff work to-date in that regard since the project kicked off in early January with the first meeting of the Elected Leadership Group (ELG).

As the ELG's sole representative of the Port of Seattle and Northwest Seaport Alliance, I hope that Sound Transit will appreciate the extensive process behind communicating our perspective, concerns and comments about the project. In my role as a Port Commissioner and NWSA Managing Member, I am focused on ensuring that the economic activity created by our organizations is beneficial and accessible to every community we serve. My approach to planning efforts around the West Seattle and Ballard Extensions project will be no different.

An integrated and robust transportation system is essential to maintaining Puget Sound's economic competitiveness and quality of life. We look forward to continuing our successful work with Sound Transit toward a system expansion that complements our ongoing economic development work for the region and toward new regional transportation solutions with respect to this project and other Sound Transit 3 extensions.

Please find detailed early scoping comments attached. Thank you for your consideration.

Sincerely,



Commissioner Stephanie Bowman
Port of Seattle Commission
Northwest Seaport Alliance Managing Member

Cc: Sound Transit CEO Peter Rogoff
Port of Seattle Commission
Port of Tacoma Commission
Port of Seattle Executive Director Steve Metruck
Northwest Seaport Alliance CEO John Wolfe

Port of Seattle and Northwest Seaport Alliance
West Seattle and Ballard Link Early Scoping, Staff Comments
March 5, 2018

Thank you for the opportunity to supply these early scoping comments. We look forward to integral involvement in defining the West Seattle and Ballard Link (WSBLink) Extensions' preferred alignment, and appreciate our inclusion in both the Elected Leadership Group and the interagency team. While we believe that these extensions could significantly improve transportation in our region, there is great risk to multiple stakeholders in overlooking key issues identified in the document.

Staff contacts:

- Geri Poor, Regional Transportation Manager, poor.g@portseattle.org
- Lindsay Wolpa, Regional Government Affairs Manager, wolpa.l@portseattle.org

Our comments follow the general outline requested in your Early Scoping Information Report:

- I. Purpose & Need
- II. Representative Alignment – issues, concerns, areas of agreement
 - A. W Seattle Link Extension
 - B. Ballard Link Extension
 - C. Downtown Segment
- III. Potential alternatives
 - A. W Seattle Link Extension
 - B. Ballard Link Extension
- IV. Elements of environment

I. Purpose & Need

We generally support the Purpose and Need statement. However, we are concerned that the statement lacks recognition that the project crosses **two of the region's largest and most productive industrial zones** (Manufacturing and Industrial Centers [MICs]) and respectfully request that **that fact is explicitly acknowledged** in the official documentation of the project.

The Port of Seattle's [Century Agenda](#) and [Long-Range Plan](#) focus on this importance of close proximity to industrial lands within our goal to "Anchor the Puget Sound urban-industrial land use to prevent sprawl in less developed areas." We firmly believe that as the Link extensions pass through the MICs, planning must respect the vitality and economic contributions of the maritime and industrial sectors of our economies with a pragmatic balance. In turn, those sectors closely rely on the symbiotic land uses and transportation systems supporting freight access and mobility. Increased transit passenger mobility must be balanced with existing and future industrial capacity and capability in these centers. In this context, it is essential to note that:

- Existing freight mobility for all modes of transportation must be maintained, and the project designed in a way that does not pre-empt future extension of freight infrastructure.
- MIC employment densities are lower than those in other Centers;
- Traditional TOD approaches, which typically include housing, are inappropriate; and

Purpose

The current Purpose includes seven bullet points, which are all important. In keeping with our comments above, we suggest adding the following bullet as well:

- “Preserve and enhance the jobs and economic contributions of the Duwamish and Ballard-Interbay MICs to the region’s economy by protecting freight infrastructure and right-of-way along the corridor.”

We suggest the following underlined addition to the third bullet:

- Connect regional growth centers and manufacturing/industrial centers as described in adopted regional and local land use... plans and Sound Transit’s Regional Transit Long-Range Plan (Sound Transit, 2014).

We believe that the sixth bullet should acknowledge that station area development may be different in stations located in the Manufacturing and Industrial Centers (MICs), as traditional transit-oriented development (TOD) of high-density residential uses would not be allowed. The Port is particularly concerned with potential diminution of essential industrial zoned area, area built and committed to industrial and marine industrial use. These areas require improvement, not fractured change to non-industrial uses and activities. Please consider the following amendments:

- Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development, station access, and modal integration in a manner that is consistent with local land use ~~plans~~ policies and code requirements.

Bullets two, five and seven’s focus on “regional mobility for all” and “a healthy environment” are also critical, recognizing that the SeaTac/Airport station has carried the highest station ridership for nearly the first decade that Link has served our region. We affirm that this system expansion will expand access to and from Sea-Tac Airport for regional travelers, visitors, and employees supporting the airport area. Similarly, there are other Port of Seattle facilities in these corridors which will provide opportunities for new Link riders, as noted throughout our following comments, but especially including our cruise terminals and Fishermen’s Terminal.

Need

The current Need includes six bullet points, with the first bullet as perhaps the most significant. Similarly to the discussion under Purpose, the Need bullets should reflect that difference for station areas in the MICs. Please consider the following underlined addition to bullet five:

- Regional and local plans call for increased residential and employment density at and around many HCT stations, and increased options for multi-modal access.

Finally, we believe that Sound Transit will need to develop these extensions in a cooperative working relationship among multiple agencies with individual public missions. We will support development of the light rail extensions, while stewarding our public mission and assets and working to find the best mutually beneficial coincident outcomes with our fellow agencies.

II. Representative Alignment – issues, concerns, and areas of agreement

The Port of Seattle and Northwest Seaport Alliance support the Link Light Rail system, and the extensions to West Seattle and Ballard. We recognize the years of planning described in the Early Scoping Information Report that have helped get us to this point. We are pleased that the Alternatives Analysis is now funded, so that the project team and stakeholders can understand our issues and concerns with the Representative Alignment, many of which we have identified in prior comment letters.

We urge Sound Transit to **integrate amenities or services that would improve HCT access to Sea-Tac** and other regionally designated centers. Air passenger ridership on Link has unique characteristics including infrequent trips, carrying luggage, discomfort with the airport/Link station walk, or early/late travel times. We ask that all new vehicles **accommodate space for passenger luggage**, an important feature not well incorporated into existing lines.

By adding new connections to the regional link system, WSBLink extensions come within the greater Sound Transit 3 program, which included other region-wide programs for system access, innovation and technology. We expect that some of these funds could be used on the WSBLink extensions, at the home or business end of the airport trip, to overcome some of the barriers to transit ridership to the airport. Similarly, airport employees' shifts frequently start or end at times that Link does not currently operate. While Link Light Rail has more reliable travel times, it is a longer trip time at off-peak hours, again a detriment to air passenger ridership.

A. West Seattle Link Extension

The Port of Seattle and Northwest Seaport Alliance (NWSA) support the extension to West Seattle, albeit with significant concerns regarding our port terminals and facilities, as well as the

supporting freight infrastructure for modes, and the potential for impacts to the vibrancy of the Duwamish MIC. We have met with staff and shared Port ownership maps.

The Port and NWSA own and operate many facilities in the Duwamish, especially water-dependent uses on the shoreline. We support the representative alignment through SODO near the E-3 busway, over the Spokane St Viaduct, and paralleling the southern side of the Spokane St right of way. We endorse this location for limiting the direct impacts on the Terminals 46, 30 and 25 (T-46, T-30 and T-25) and the Port's maintenance shop at T-25 S Horton St. Access to T-25/30, T-18 (and all Harbor Island port and non-port facilities), and T-5 must be evaluated and potential negative effects avoided and minimized. Soil conditions should be given considerable review at all sites.

The aerial Link extension **must preserve and protect the major truck access** to our Terminals 5 and 18, the BNSF rail, T-104 and access to the Port of Seattle's Harbor Marine Center (T-102) on Harbor Island – east-west mobility in the Spokane Street corridor is congested and complex. As you may know, NWSA formed in 2015 to jointly operate the nation's fourth largest gateway for international containers and some maritime industrial properties of the Port of Seattle and Port of Tacoma. The light rail expansion through SODO to West Seattle and the Sounder expansion **must be cognizant of potential impacts to the nation's international trade flows**, and must protect, preserve or enhance those facilities and operations.

The port's role as an economic engine prompted the creation of a state Growth Management Act requirement for Comprehensive Plan **Container Port Element**, which in turn **required the inclusion** the concept within the Seattle Comprehensive Plan. This was finalized by the City of Seattle in 2012. See in particular Policy CP 1.6 about preserving freight access to the terminals and Policy CP 1.2 about protecting land near the port with zoning for port-related activities.

The "Terminal 5 (T-5) Wharf Rehabilitation, Bertha Deepening and Improvements Project" is projected to be **fully operational by the time** the West Seattle Link goes into construction in 2025. As a permit condition for the T-5 redevelopment, the NWSA is to install an approved Federal Rail Administration Quiet Zone (QZ) corridor between the T-5 gate and the West Duwamish rail bridge. The **foundations and columns for the proposed alignment** of the West Seattle Link bridge would need to be placed in a manner **that will preserve and protect the Quiet Zone corridor** and the at-grade crossing access to the businesses. Note that NWSA is providing more than \$5 million in funding and working with Seattle Department of Transportation (SDOT) and BNSF to establish the QZ. The QZ will eliminate uncontrolled at-grade crossings in the corridor. The main, and ultimately (by the time construction for the West Seattle Link bridge begins in 2025) the only, rail crossing providing access to the business on the east side of the railroad between T-5 and the Duwamish rail bridge will be located between Spokane St and the West Seattle Bridge.

Both rail and vehicle access to and from T-5 and T-18 **must be protected and preserved without limiting the freight movement** in the international supply chain. The BNSF rail tracks, which also run south of Spokane Street, provide critical access to Harbor Island and T-5, so avoidance of those tracks is critical for piers, footings, and any construction impacts. The alignment must not pre-empt any future freight rail capacity expansion, at the railyards and terminals, or along the Spokane Street corridor.

The Port's Harbor Marina Corporate Center (T-102) already has limited access (also on Harbor Island, south of Spokane St). SSA Marine (T-18's marine terminal operator), maintains offices at T-102 that provide critical support for their operations on the other end of Harbor Island. Also, the Port's T-104 lies between East Marginal Way and the East Waterway, west of the East Marginal Way Grade Separation. Further design work will also **require close coordination** with us regarding facilities access, impacts of construction, aerial guideway column placement and light rail operations.

For the Link bridge over the commercial waterway:

- Air draft should be **at least as high** as the West Seattle Freeway;
- Column spacing within the waterway should be **at least 200' and in alignment** with the existing navigation path beneath the Swing Bridge and the BNSF trestle.

During construction, the Duwamish waterway **must not be restricted** from navigation of barges up to 105' beam by 420' length, and air draft currently available.

In SODO, our understanding is that this alignment does not use public street rights of way, such as 1st or 4th Avenues S. Beneficially, this means no direct capacity loss in the SODO public rights of way, yet we need to understand if existing buses on the busway would be displaced to city streets. The arterials in SODO are already constrained and certainly congested during peak commute hours; further traffic volumes risk interfering with freight mobility in this over-burdened section of the Duwamish MIC. Impacts to avoid or mitigate include: loss of lanes, loss of turning or freight parking/loading capacity due to dedicated transit-ways or aerial guideway columns; construction activity of guideway or stations' and increased at-grade rail crossings in industrial areas. In summary, project planning and development must focus on limiting and/or mitigating any impacts to freight access and mobility.

B. Ballard Link Extension:

The Port of Seattle supports the extension to Ballard, again with significant concerns regarding our port terminals and facilities and potential for impacts to the vibrancy of the Ballard-Interbay Northend Manufacturing/Industrial Center (BINMIC). The Ballard Link Extension corridor is in the center of the 615-acre BINMIC, anchored by Fishermen's Terminal and Terminal 91, both essential water-dependent marine industrial assets, with related effects on other adjacent industrial uses and activities. Here also, we have met with Sound Transit staff and shared Port

ownership maps. As with the West Seattle extensions, all sites must receive considerable review of soil conditions.

BINMIC is headquarters to industrial, maritime and fishing, and manufacturing activities. The light rail expansion to the northwest to Ballard **must be sited with regard to the maritime and BINMIC operations**. Many vessels from the North Pacific fishing fleet homeport at facilities on the Lake Washington Ship Canal, Salmon Bay, and Terminal 91 (T-91), especially including Fishermen's Terminal. **Fishermen's Terminal** is critical to Seattle's maritime economy (please see further information below). **Terminal 91** is our 200-acre facility which serves multiple customers, which is the homeport for the commercial fishing fleet, and **Smith Cove Cruise Terminal** our two berth facility. Along with the Bell St Pier Cruise Terminal, these berths have led to recent growth in Seattle's tourism industry, driven by the burgeoning cruise ship industry.

The Port also operates **recreational marinas**, the Maritime Industrial Center, and recently agreed to acquire the **Salmon Bay Marina**, 2100 West Commodore Way (*final possession later in 2018*). Additionally, T-91 includes significant acreage for which the Port has considered redevelopment options, and is currently considering **industrial and/or commercial redevelopment**. The **Maritime Industrial Center**, at 2700 W Commodore Way, offers short-term and daily moorage for vessels up to 250' in length, concrete dock space for loading and repair/maintenance work, short-term gear storage and staging, and office and shop space. The economic impact of Port of Seattle Related Fishing at T-91, Fishermen's Terminal and the Maritime Industrial Center is 16,000 direct/indirect jobs, \$1.3 billion annual payroll, \$1 billion annual business revenue, and 120 million annual local taxes (p. 34, Endnote 1).

If the proposed alignment remains elevated, the Link bridge over the Lake Washington Ship Canal, air draft **should be at least as high** as the Aurora Bridge. Column spacing within the waterway should be at least 200' and in alignment with the existing navigation path beneath the Ballard Bridge. During construction, the Ship Canal should not be restricted from navigation of vessels up to 78' beam by 400' length, and air draft currently available under the Aurora Bridge. We advocate that a Ship Canal crossing should be a fixed structure, not a bascule or other "opening" span, so that marine traffic and light rail are completely independent of one another.

Specifically, we have documented many times, in many comment letters, our concerns over the impacts of the representative alignment on the west side of the Ballard Bridge. Fishermen's Terminal is the vibrant home of the North Pacific Fishing Fleet. It is a living landmark, as well as an active industrial site that is home to the core of the current and evolving fishing industry. Fishermen's Terminal (established in 1919), is the largest single-built, committed fishing industry support site in King County encompassing 76 acres. Fishermen's Terminal offers a full complement of services for commercial fishing and workboats. Additionally, there is year-round and seasonal freshwater recreational moorage. Landside businesses at Fishermen's Terminal include a wide range of businesses, from support services for fishing and commercial maritime activities, to retailers, restaurants and offices. We recently completed a strategic plan for

Fishermen's Terminal which calls for expanding the on-site roster of suppliers that serve the fishing fleets. Private sector actors in the fishing cluster are bullish as well. Note that the 2016 report "Modernization of the North Pacific Fishing Fleet Economic Opportunity Analysis" (Endnote 2) probes an emerging trend for new-build fishing vessels in Washington State shipyards.

On Fishermen's Terminal (FT), along the eastern-most side, Fishing Vessel Owners (FVO) and their two marine ways are situated directly west of the bridge. FVO operation is profoundly vital to the local maritime industry: **losing the operation would have significant domino impacts to other marine and fishing related businesses**. FVO is one of the Port of Seattle's oldest tenants, providing services from their current location since 1919. The two FVO rail systems (300-ton and 500-ton) haul approximately 50 vessels per year for repair on land and FVO works on about 50 vessels per year in the water. If the columns for the light rail aerial structure touch down on the areas leased to FVO, the impacts to the piers, above ground and in water rails, landside structures and operations would be very significant. Studied during the monorail studies in 2003-5, relocation of their service and function was found to be infeasible. This likely would result in FVO moving their operation out of Seattle or closing all together, and the loss of about 30 family wage union jobs and Port revenue, as well as impacts to vendors and subcontractor jobs. Having the convenience of a trusted shipyard is a large factor in many of the vessels staying at FT and paying higher rents. Another trickle-down effect would be lower occupancy on the docks and fewer people supporting the upland businesses at FT.

We have **grave concerns that piers and footings** of a new bridge would create new navigational constraints in the area west of the Ballard Bridge, where access, turning and maneuvering for larger vessels, especially the fishing fleet needs to be taken into consideration (both in the final design and during construction). Other impacts to Fishermen's Terminal would potentially be reduced storage and laydown space, reduced parking, and reduced moorage slips.

While we will propose alternative alignments in the next section, we support the representative alignment being aerial, rather than at-grade, in the Elliott/15th Ave W corridor: this is already a congested city arterial which also serves as the freight spine through Seattle, connecting the two MICs and also the major access route to the Pier 91 cruise terminal.

Planning must focus on minimizing loss of capacity on the freight spine. Impacts to avoid or mitigate include: loss of lanes, loss of turning or freight parking/loading capacity due to dedicated transit-ways or aerial guideway columns; construction activity of guideway or stations, and increased at-grade rail crossings in industrial areas. The Elliott/15th Ave W corridor has no proximate parallel routes that could accommodate vehicles or truck-turn maneuvering both in final operations and during construction and so such functions must be incorporated into the corridor design. In summary, project planning and development must focus on limiting and/or mitigating any impacts on freight access and mobility, and other users in the corridor such as the

cruise industry. For this reason, we recommend consideration of alternatives to the representative alignment in the next section.

Station location: We look forward to further station area analysis for the Smith Cove stop, to consider how best to capture the T-91 employees (fishing, industrial and cruise) and cruise terminal passengers. We support the stops providing access to Seattle Center, especially for the redevelopment at Key Arena.

C. Downtown Segment

We support the 5th Avenue tunnel, over other alternatives considered such as an at grade alignment in 1st Avenue. A chief issue of a 1st Avenue alignment is the potential loss of vehicle capacity through downtown, as well as farther south in SODO and the Duwamish.

III. Potential alternative alignments

The Port and NWSA believes that there is significant work to do on alternative alignments. The public and a wide range of stakeholders need a better understanding of benefits and constraints in order to be able to make trade off decisions. Please address the following in your analysis of alternatives, in keeping with our more detailed comments above.

A. West Seattle Link Extension

- 1) Southerly single river crossing of Duwamish farther south than Spokane St Corridor (Idaho/Genesee): The Port would support such an analysis to remove impacts from the highly subscribed Spokane St Corridor which currently carries multiple levels of automobile traffic, active rail lines, and river traffic. Light rail in this alternative must be situated carefully to minimize impacts to Port terminals south of the Spokane St Corridor: T-102, T-103, 104, 106, and 115. T-105 and T-107 are public open space and shoreline access sites.
- 2) Negative effects are unacceptable for an alignment north of the Spokane St Bridge, especially if unable to accommodate access needs to T-5, T-18 and other Harbor Island businesses.
- 3) The rail corridor along the Spokane Street corridor was designed with the potential for an additional rail track. That right-of-way must be protected, as well as the rail yards.
- 4) Any crossing of the West Duwamish Waterway must be designed to not impede commercial traffic on the waterway.
- 5) During construction, it will be important to maintain freight mobility and access to our terminals, as well as other freight trip generators, for all modes of transportation.

B. Ballard Link Extension

As mentioned above in comments regarding the preferred alignment, Elliott/15th Ave W is already a congested city arterial, the spine for freight travel through Seattle, and the primary route to the Smith Cove Cruise Terminal and industrial land at T-91. Fishermen's Terminal, one of the Port's oldest active facilities, stands to lose a significant tenant under the representative alignment

(reference significant details above on FT). Seattle's cruise homeport serves over one million annual passengers, and Smith Cove Cruise Terminal has 2 of Seattle's 3 berths. Good access to the public transit system for maritime and industrial employees and cruise passengers reaps benefits.

We endorse further study of alternative designs to resolve these issues, and suggest the following:

- 1) **Tunnel under Ship Canal as in Alignment C-01(c)**: We believe that a tunnel under the Lake Washington Ship Canal (Ship Canal) will contribute to system reliability at a scale to justify that investment. It will also eliminate conflicts with the Port's Fishermen's Terminal that were well documented and never resolved in high capacity planning proposals including the monorail project. (Please reference FT information on page 6 of this letter). The Representative Alignment considered for a new Ship Canal Bridge is west of the existing Ballard Bridge, which would likely require acquisition and relocation of the Fishing Vessel Owners (FVO) facility, an active operation providing unique capabilities to the maritime industry. Additionally, this would relieve new navigational constraints in the area west of the Ballard Bridge due to piers of a new bridge, for access, turning and maneuvering for larger vessels. We need detailed design and construction evaluations of these alternatives.

However, in pursuing such a tunnel, we have a concern related to our new property, Salmon Bay Marina. Sound Transit staff has noted that a vertical tunnel access shaft would be part of tunnel construction and that this marina is being considered for the site of the shaft. The property currently contains City, state and federal approvals for improving the site, and the Port is beginning plans for upland improvements. This could also be impacted by the vertical tunnel access. Again, this is prime waterfront industrial land, and we urge Sound Transit to explore alternative locations. However, our significant concerns can only be clarified with detailed design and construction evaluations.

The entire BINMIC and ship canal area will be impacted by this decision and would be adversely affected by poor planning and design. We anticipate that study of a tunnel under the ship canal may relieve impacts on the maritime industry and family-wage jobs dependent on the ship canal location.

- 2) **Tunnel under ship canal closer to 15th**: While a tunnel was proposed farther west in the studies for the ST3 System Plan, we would also request study of a tunnel under the ship canal at 15th Ave W, to improve system reliability (compared to a ship canal bridge) and reduce impacts on the BINMIC and Fishermen's Terminal.
- 3) **Tunnel under Elliott**: Traffic is already very congested in the Elliott/15th Corridor. Construction and support columns for the aerial alignment would only exacerbate the poor traffic in the area and restrict traffic movement. It would be very difficult to mitigate these impacts by acquiring properties and add lanes(s) to improve traffic flow. An underground option is very expensive but construction, long-term environmental, and traffic impacts must be carefully assessed. Having

this segment of the Ballard extension underground would offer an opportunity for a shorter or straighter alignment between the Seattle Center and Smith Cove stations.

4) Adjacent to Balmer Yard

a) **West side: C-01c – Aerial via Interbay West**

This alternative would better serve new development, jobs and economic activity in the Interbay sector of BINMIC. The opportunities for ridership from the new Expedia campus, cruise ship terminal, fishing and industry on T-91, and potential new development of T-91 uplands make this segment critical for partnerships in transportation improvements.

Further design work would require close coordination with Port of Seattle regarding our facilities, access and impacts of construction, and light rail design. It is important to protect the numerous industrial operations at T-91, as well as the integrity of operations throughout T-91 and in the light industrial buildings adjacent to the tracks. Similarly, impacts to the regional bike path connecting NW Seattle to downtown must be identified and mitigated. Planning is underway for redevelopment of the northern lands of T-91 and that access should be considered as part of Sound Transit's studies.

b) **East of Balmer Yard: C-01c – aerial via Interbay East**

We also request that Sound Transit consider alternate routing for C-01c that follows the east edge rather than the west edge of the BNSF Balmer railyard. Proceeding south from the Ship Canal tunnel, the rail would tunnel south under the BNSF Balmer Yard to the easterly side and proceed south to connect with the current proposal. In favor of this alignment proposal is the opportunity to access the properties east of Balmer, and the lack of abutting residential lots as compared with the 20th Ave W segment north of Thorndyke Ave W. Issues with the C-01c alignment in the west edge of the Balmer yard are the critical access road for the 120-acre T-91 Port property and the regional bike path. As such, the light rail design would have to preserve access to the numerous light industrial operations currently in this section of T-91, and address the bicycle path.

Overall, as you evaluate these alternatives, please determine impacts to Port-owned property at 1617 – 15th Ave W (known as the former Tsubota Steel site). The property is irregular in shape and the most logical redevelopment scenario would be focused on the south edge where Route Option C-01c was proposed. Acquisition of a portion of this property would affect the value and could render the entire property unviable for redevelopment.

- 5) Please work with us to consider how **the Smith Cove station** could better serve the fishing and industry employees at T-91 and especially **the hundreds of thousands of cruise passengers** and employees at Smith Cove Cruise Terminal. This could also include an opportunity for a Transportation Hub in the Smith Cove area which could provide opportunities to connect passengers from Sounder train service and Link Light Rail.

- 6) **East side of Ballard Bridge**: While we firmly believe we must protect existing maritime and industrial business, a thorough study would also review a Ship Canal Crossing on the East side of the Ballard Bridge.

IV. Elements of the Environment

Transportation: Please consider transportation access to all Port properties and facilities, port-related businesses, and impacts to freight mobility across the city, including to, from and between the two MICs. Consider road, water and rail transportation, including rail yards. The benefits or impacts to freight mobility should be key comparison of project alternatives. Please identify how **exactly the alignments correspond with the Seattle Freight Master Plan**. This plan was created over several years with significant input from the Port and other relevant stakeholders. Its implementation is barely underway.

Acquisitions, Displacements and Relocations: We have provided many details about the potential impacts to Fishermen's Terminal and specifically the critical FVO shipyard uses and activities at the eastern end of the site. We are concerned about property impacts, but also resultant implications for direct and related Fishermen's Terminal businesses. Analysis should include the interdependency of industrial businesses and the dependency of industrial businesses on a working waterfront.

Land Use: As discussed in our Section I comments on the Purpose and Need, please provide analysis of impacts as the extensions pass through the city's two MICs, and potential to protect and improve access conditions for these industrial areas. The Port is particularly concerned with loss of essential industrial zoned area, that is, area built and committed to industrial and marine industrial use. We would not want to see non-compatible land use changes resulting from new high capacity transit stations, nor would we want a poorly designed transportation system to degrade access and lead to erosion of industrial capacity and capability, most noteworthy being heavy transportation access. Impacts could include gentrification or potential to attract land uses that are incompatible with existing zoning for industrial uses. More specifically, Sound Transit should avoid incompatibilities with industrial development that could arise from siting stations adjacent to industrial zoned land that may result in pressure for high density non-industrial development, or any type of residential use in the MICs. The Port is particularly concerned with potential diminution of essential industrial zoned area, area built and committed to industrial and marine industrial use. These areas require improvement, not fractured change to non-industrial uses and activities. Please consider the following

Economy: We have significant concerns about economic impact resulting from unmitigated impacts to businesses which could also affect supporting or related businesses in the maritime, fishing, cruise or industrial economic sectors. Analysis should include the potential for impacts on industrial lands or businesses to induce acquisitions, displacements, and relocations on interdependent businesses and land.

Social, community facilities and neighborhoods: address transportation effects on Duwamish and BINMIC business community.

Visual/Aesthetics: Please address aerial structure in existing traffic corridor, visual leading to fundamental safety and circulation liability.

Noise/Vibration: Please address construction and operational effects as well.

Water resources: Please include potential for contaminated soils affecting groundwater conditions.

Air Quality: Please translate freight transportation changes into impacts to air quality, such as potential emissions impacts of increased truck idling from increased congestion throughout the system or at-grade crossings.

Geology/Soils: As acknowledged earlier in our comments, the area is comprised of landfill in historic shallow intertidal aquatic area sediments, with shallow ground-water conditions. It is very complex and will require **detailed evaluations**.

Hazardous Material: Due to previous industrial land uses, contamination along the corridor is highly likely.

Public Services, safety and security: Please address where at grade Link service might interfere with emergency access. Also how would Link light rail potential impact secured Port facilities?

Energy Impacts and Utilities: Please ensure there is sufficient capacity in existing utilities, and ensure that there is room for increased capacity to accommodate expected growth in addition to the Link Extension's needs. Please address this concern with power capacity and the need to upgrade infrastructure.

Parks and Recreational Resources/Section 4f & section 6f: The Port operates several recreational marinas, and 42 public access points. Many of these are located along the Duwamish River and should be acknowledged if there would be Link impacts.

Environmental Justice: Please evaluate environmental and social justice impacts to industrial jobs.

Construction Impacts: Please evaluate all elements of the environment for impacts during construction, particularly as noted here.

Cumulative Impacts: Please evaluate all elements of the environment for cumulative impacts from direct and indirect development.

In summary, the Port believes that improved regional transportation for personal mobility, freight mobility and maritime/industrial land protections can and must co-exist in order to maintain Puget Sound's economic competitiveness and quality of life. We look forward to partnering with you to expand the Link Light Rail to Ballard and West Seattle.

Endnotes:

1. https://www.portseattle.org/Supporting-Our-Community/Economic-Development/Documents/2014_economic_impact_report_martin.pdf
2. https://www.portseattle.org/Supporting-Our-Community/Economic-Development/Documents/Fleet%20Modernization%20Final%2011_11.pdf