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The Seattle Freight Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the City in development of a functional and efficient freight system and on all matters related to freight and the impact that actions by the City may have upon the freight environment.

City Council Resolution 31243

March 29, 2019

WSBLE

c/o Ms. Lauren Swift, Central Corridor Environmental Manager
Sound Transit

401 S. Jackson Street Seattle

WA 98104-2826

(delivered via e-mail: WSBscopingcomments@soundtransit.org)

Dear Ms. Swift:

Re: NEPA/SEPA Scoping Comments from Seattle Freight Advisory Board
Sound Transit 3 West Seattle Ballard Link Extensions (WSBLE)

This letter reflects the comments of the City of Seattle Freight Advisory Board (SFAB) regarding the NEPA/SEPA scoping and purpose and need for the Sound Transit 3 West Seattle Ballard Link Extensions (WSBLE). The SFAB was founded by Seattle City Council resolution to advise the mayor, council, and city departments on matters related to freight and the impact that various activities may have on our freight environment.

We appreciate the project briefing given to SFAB on February 19, 2019. In accordance with the WSBLE NEPA/SEPA process, we are submitting these scoping comments on the alignment alternatives and general environmental impacts for your consideration.

In general, we support the purpose and need of the project, which is to provide high-capacity transit (HCT) for Seattle-area travelers. In addition to improving non-auto mobility, we encourage the project to protect and enhance freight movement in the region.

COMMENTS ON ELEMENTS OF THE ENVIRONMENT

Minimize Negative Freight Mobility Impacts

Freight movement – like HCT – is a critical component of Seattle’s transportation system. Potential effects of this light rail project on Seattle’s freight system must be identified and evaluated in the environmental review. The 2016 Seattle Freight Master Plan identifies the freight network for trucking activity on city arterials and streets, designating ‘limited access’, ‘major truck’, ‘minor truck’, and ‘first-/last-mile connector’ streets. Please identify potential construction and operating impacts on this network, especially in and between Seattle’s two Manufacturing/Industrial Centers (MICs). Please specifically consider and identify the effects that buses leaving the E-3 busway will have on SODO arterials and the effects the project may have on 15th Avenue W and Elliott Avenue W, which serve the Ballard MIC.

Minimize Construction Impacts

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We understand that light rail construction is a complex, multi-year project and that construction impacts are temporary. That being said, these temporary impacts may be extremely disruptive to goods movement. In the MICs in particular, freight facilities operate throughout the day, and often in off-peak times. Trucks serving these MICs are long, wide, and heavy, and require large turn paths. Construction that occurs outside peak hours and occupies travel lanes - especially within the MICs - should be identified in the environmental review for mitigation of negative impacts and coordinated with freight interests well in advance. Potential negative impacts include increasing conflicts between freight and vulnerable travelers (non-motorized modes), particularly in MICs and along freight priority corridors.

Freight operates in very confined spaces in downtown Seattle. Please address, as part of project impacts, the need for delivery space in downtown. Please identify the need for light rail construction teams to coordinate with other, non-light rail construction operations to maintain adequate on-street and/or alley freight operations space throughout the project.

Boring (or mined) tunnel construction is preferred if it can be shown to reduce freight access restrictions and roadway closures. A cut-and-cover construction method would likely be far more disruptive.

For construction near navigable waterways, consider use of barges for hauling and construction. This may reduce the congestion, pollution, and noise impacts of construction trucks on city streets and the freight network.

Minimize Negative Economic Impacts

Freight movement – by water, rail, air, and road – is critical to our regional economy. Washington is one of the most trade-dependent states in the nation; freight-related industries support 1.46 million jobs and \$128.8 billion in domestic products statewide. Roughly 40% of all jobs in our state can be tied to trade-related activity. In the Puget Sound region, freight-dependent industries support almost 900,000 jobs and \$91.9 billion in domestic product. The two MICs in Seattle employ nearly 75,000 people, primarily in family-wage jobs.¹

Efficient freight movement is essential to this economic engine and to the family-wage jobs it provides. The West Seattle and Ballard light rail alignments will impact both of Seattle's PSRC-designated MICs. Impacts to freight and industrial/maritime operations in these MICs must be evaluated in the economic impact assessment in the environmental analysis. Considerations in this evaluation should include the value of freight to our economy in terms of urban deliveries/pickups, industrial and international imports/exports, and light rail's likely impacts to this value, during both construction and operation.

COMMENTS ON ALTERNATIVES

¹ Source: Seattle Industrial Areas Freight Access Project, May 2015

Alternative 1, Representative Project

This alternative would have significant effects on major truck streets, endangering freight movement. In particular, the Ballard Interbay North Manufacturing/Industrial Center (BINMIC) would be affected, as the proposed alignment travels along 15th Avenue W, cuts through the Port of Seattle's Fishermen's Terminal, and interrupts marine cargo movement on the ship canal with a mid-height movable bridge. We do not believe the construction and operational effects of this alignment could be mitigated.

Both 15th Avenue W and Elliott Avenue W are major truck streets that also transport hazardous materials. Locating guideway columns along these roadways needs to address the impacts to freight.

The location of the proposed Smith Cove station on Elliott Avenue W will increase pedestrian and bicycle traffic across Elliott Avenue W, even if a grade-separated option is provided. Increased crossings will impact this major freight route.

Alternative 2, West Seattle Elevated / C-ID 5th Ave / Downtown 6th Ave / Ballard Elevated Alignment

Crossing the Duwamish Waterway south of the West Seattle Bridge will have significantly less impact on freight circulation and access to Harbor Island freight terminals and industrial facilities.

Please provide more information on how the tunnel under Elliott Avenue W would be constructed. This undercrossing appears to have less of an operational impact than an aerial crossing, which is shown in Alternative 1.

In Interbay, this alignment follows BNSF's Balmer Yard tracks. Please evaluate how this at-grade alignment would limit future spur line access to land between the railyard and 15th Avenue W.

Please identify the potential effects of constructing and operating a bridge over the Lake Washington Ship Canal, including impacts on marine navigation and maritime business access (both via road and water). Please recognize that many businesses on the ship canal are completely dependent upon water access and may not be able to re-establish their activities if forced to relocate.

Alternative 3, West Seattle Tunnel / C-ID 4th Ave / Downtown 5th Ave / Ballard Tunnel

By crossing the Duwamish Waterway north of the West Seattle Bridge, there will likely be significantly greater impacts on freight circulation and industrial operations, considering the surface roads below (SW Spokane Street and Klickitat Avenue). These roadways provide access to freight origins and destinations on Harbor Island, including the Port of Seattle's Terminal 18 and other private terminals and shipyards.

Please evaluate impact to freight traffic as this alignment enters downtown on 4th Avenue S, and how a cut-and-cover tunnel would compare with a mined tunnel during construction.

Our comments on Alternative 2 regarding the relationship of the proposed light rail guideway to BNSF Balmer Yard, Elliott Ave W, and 15th Avenue W are also concerns for this alignment.

COMMENTS ON PURPOSE & NEED STATEMENT

Overall, we support the purpose and need statement, yet recommend that the project statement acknowledge that it crosses through our city's two PSRC-designated industrial zones (MICs). We feel strongly that where these Link extensions pass through MICs (Duwamish and Ballard-Interbay), planning and construction respects the vitality and regional economic contributions of these areas. Seattle's MICs have developed over time with synergistic land uses and transportation systems that support freight access and mobility. As this project moves forward, increased transit passenger mobility must be balanced with industrial capacity and capability. In this context, it is essential to note that:

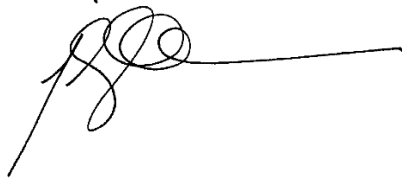
- Existing freight mobility (for all modes: road, rail, marine, etc.) must be maintained and the project designed so as to not preclude future development of freight infrastructure
- MIC employment densities are inherently lower than those in other regionally- and locally-designated centers
- Traditional transit-oriented development (TOD), which typically includes housing and ground floor commercial, is inappropriate in MICs

The current 'need' section includes six bullet points. We recommend these reflect the important differences of station areas in the MICs. Please consider the following underlined addition to bullet six:

- Regional and local plans call for increased residential and/or employment density at and around most high-capacity transit (HCT) stations, where consistent with local zoning.

We look forward to working with Sound Transit to address impacts to freight as part of the environmental documentation and we appreciate Sound Transit's efforts to reach out to City of Seattle advisory boards.

Sincerely,



Jeanne Acutanza
Chair, Seattle Freight Advisory Board