



April 2, 2019

Ms. Lauren Swift, Central Corridor Environmental Manager
West Seattle Ballard Link Extensions Scoping
401 S Jackson St
Seattle WA 98104
WSBScopingComments@SoundTransit.org

Re: West Seattle and Ballard Link Extensions Scoping

On behalf the Port of Seattle (Port) and Northwest Seaport Alliance (NWSA), thank you for the opportunity to provide scoping comments to begin the NEPA/SEPA environmental review.

In 1911, the Port of Seattle was authorized by the citizens of King County under Chapter 53 of the Revised Code of Washington to serve as a public port authority, charged with ensuring that Seattle's deep-water harbor is protected to serve as an economic engine for the region. In 2015, the ports of Seattle and Tacoma formed a marine cargo operating partnership, the NWSA. The Alliance is the fourth-largest container gateway in North America.

The Port and Alliance operate and maintain the more than \$1 billion in investments made into maritime and industrial operations, and work to protect the tens of thousands of family-wage jobs and \$4.0 billion in revenue that these sectors generate for the region and state. The Port and NWSA are assets of statewide significance, serving as critical gateways for the agricultural producers and manufacturers across Washington. These gateways cannot be replicated elsewhere and provide a crucial function in the resiliency of our state's economy. These facilities could be heavily impacted at the south, central, and north ends of the proposed alignments. No other single agency or entity is similarly impacted, and it is imperative that all efforts are made to avoid and/or mitigate adverse impacts to these crucial economic assets wherever possible.

As stated in our early scoping letter, 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.

We appreciate Sound Transit's broad stakeholder engagement on the development of alternatives for extensions to West Seattle and Ballard, and the direct engagement of design and planning staff with agencies in the proposed alignments.

Sound Transit staff has worked closely with Port and NWSA staff to better understand and work towards addressing concerns near port terminals both during construction and during link light rail operations. Proposed routes, especially north of the Spokane Street corridor, have the potential to create significant negative impacts on cargo operations and water-dependent logistic functions, with resulting negative economic effects across several industries, far beyond the Seattle harbor and King County.

Particularly problematic, the expected impacts during the estimated five-year construction period could damage international container cargo operations and significantly contribute to truck and other traffic in the already congested Spokane Street corridor. We remain unconvinced that the potential effects, especially with a route north of the Spokane Street corridor, could be mitigated for the Port, the NWSA, and other maritime/industrial businesses. From our perspective, this is not sufficiently covered by the current approach to measuring the economic impacts of the project, yet it is essential in ensuring the continued economic viability of these businesses.

The accompanying document outlines the areas where a thorough review of proposed alignments is necessary to determine how they could impact the public benefit the Port and the NWSA are charged with providing.

West Seattle Segment

- Spokane Street Corridor alignments could pose significant economic, environmental and operational impacts not only to Port and NWSA facilities, but to maritime industrial businesses that must have waterfront access to survive. Proposed alignments must ensure those facilities remain fully operational during and after construction, while ensuring access for trucks and rail serving those facilities. A crossing north of the Spokane Street must be given a thorough review to ensure that the cost estimates as well as impacts are accurately gauged.
- Please evaluate Duwamish crossing alignment slightly farther south than that considered in the representative alignment, across the far southern tip of Harbor Island, to determine if this alignment may present opportunities to further reduce impacts to existing businesses.

Interbay/Ballard Segment

- Moveable bridges across the ship canal may have significant impacts on maritime mobility as well as transit, and the cost, operational, and environmental effects should be studied as part of the environmental review process.
- Smith Cove station location will have significant impacts to ridership, with the location on the west side of the corridor appearing to serve more developed land uses, and capturing potential riders from Port properties, including employees and cruise passengers.

Thank you for your invitation to the Port to serve as a Cooperating Agency and to the NWSA as a Participating Agency, roles we believe will further ongoing cooperation between our agencies. We have expressed our interest in entering into a partnership agreement to define roles and responsibility in how the agencies will work together on project planning and environmental documentation.

We ask that these impacts effects be fully vetted through the environmental review process, and that the Board designate a route alignment with a southern crossing of the Spokane Street corridor as the preferred alternative. Please reference our detailed scoping comments attached. Thank you for your consideration and we look forward to our continued involvement.

Sincerely,



Stephen P. Metruck
Executive Director
Port of Seattle



John Wolfe
Chief Executive Officer
Northwest Seaport Alliance

Attach A – Technical Comments
Attach B – POS - Cooperating agency acceptance
Attach C – NWSA - Participating agency acceptance
Attach D – POS/NWSA Early Scoping comments, March 2018
Attach E – POS/NWSA Level 2 comments Sept 2018