



VIA ELECTRONIC MAIL

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

RE: Comments on the DEIS for West Seattle and Ballard Link Extensions Project

Dear Ms. Swift,

We are writing on behalf of Chinatown-International District Business Improvement Area (CIDBIA) to provide comments on the Draft Environmental Impact Statement (“DEIS”) for the West Seattle and Ballard Link Extensions Project (“WSBLE”), notice of which was issued on January 28, 2022. Thank you for your consideration on these comments to address a historic project that will affect the Chinatown-International District and Pioneer Square for the next 100 years.

About CIDBIA and Chinatown-International District

Chinatown-International District Business Improvement Area (CIDBIA) is one of 11 Business Improvement Areas (BIAs) in the City of Seattle. The CIDBIA is a geographic based nonprofit organization that is tasked with improving and promoting Seattle’s historic Chinatown-International District as a vibrant business district. CIDBIA collects an assessment from properties, businesses, and other types of stakeholders within the geographic boundaries to support the economic vitality of the neighborhood. The boundaries of CIDBIA are from 4th Avenue South to Interstate-5, Yesler Avenue South to South Dearborn Street, however, the scope of work for the organization extends beyond the geographic boundaries east to Rainier Avenue South to also service the Little Saigon neighborhood. CIDBIA is governed by a ratepayer advisory board who represent stakeholders in the district, including property owners, small business owners, large business owners, nonprofit partners, and the community at large. CIDBIA’s ratepayer board members live, work, and play in Chinatown-ID. In addition to the stakeholders above, Sound Transit is also a current CIDBIA ratepayer, with assessment due on office space at Union Station.



Since its inception in 1995, CIDBIA has worked towards its mission of improving and promoting Chinatown-ID through four areas of work: sanitation, public safety, marketing and events, and advocacy. We work with stakeholders to supplement city services to beautify streets and sidewalks through litter pickup, biohazard cleaning, and removing or covering graffiti on historic and non-historic buildings. We work with businesses and residents to provide resources and help report crime, which has disproportionately affected Chinatown-ID over the last several decades. CIDBIA hosts several large, culturally significant festivals to promote businesses and celebrate the unique identity of the neighborhood. Each of CIDBIA's events brings thousands of visitors to Chinatown-ID each year. Creating a clean, safe, welcoming business district is critical in the economic vitality of small and large businesses in Chinatown-ID.

Most small businesses in Chinatown-International District are family owned and operated. The profile of small business owners are often immigrants or refugees, with limited English proficiency, and limited digital literacy. Chinatown-ID is primarily a restaurant district, representing foods from all over Asia. The neighborhood is a regional draw where customers can find foods, herbs, groceries, and more from their home countries. Many Asian-Americans in the region describe Chinatown-ID as a cultural hub where they have a sense of belonging. In addition to restaurants, the neighborhood is home to thousands of residents both young and old, predominately Asian, and low income. Residents of the neighborhood utilize other small businesses in the neighborhood, such as their doctor's office, pharmacies, herbal stores, and grocery stores, many of which cater to their non-Western cultures and spoken or written language.

In the past two years, the Covid-19 pandemic has created an untenable environment for small businesses to survive, let alone thrive. During this time, we saw businesses shut down dining rooms, operate with skeleton crews, and frantically apply for financial aid to make it to the next week or month. As Coronavirus gained traction in Asia, many local Asian businesses lost revenue before their American counterparts. Just months later, the neighborhood began to see a rise in anti-Asian violence, graffiti, and rhetoric. Prior to the Covid-19 pandemic, Chinatown-ID has experienced multiple years of negative impact from outside forces.

Government mandates and projects have shaped the identity and spirit of Chinatown-International District for decades, often without concern for the inhabitants, their safety and wellbeing, or their culture. Once a vibrant home to Seattle's largest Japanese population, the internment of Japantown residents with Order 9066 during World War II left a hole in the cultural identity of the neighborhood. With a rise in gentrification, Chinatown-ID's Black and Indigenous population were forced out of the neighborhood. Although making significant contribution to the landscape of the neighborhood, local government essentially erased the identity of Filipino Town through legislation. In the last decade, development has changed the landscape and population of Little Saigon, an area of settled refugees from Vietnam. Federal,



state, and city governments have shaped the neighborhood through projects such as the Interstate-5 construction, literally splitting the neighborhood in half. The neighborhood has experienced the construction impacts of the Kingdome, then Safeco Field, and then CenturyLink Field. Chinatown-ID has felt the pressure of construction impacts from the SR-99 deep bore tunnel, Seawall, Seattle Waterfront, and demolition of the Alaskan Way Viaduct in adjacent Pioneer Square. In recent years, the construction of the First Hill Streetcar impacted the neighborhood for years. Time and time again, government's role in implementing projects have come with a cost to Chinatown-ID, its residents, businesses, and its cultural identity.

It is with this history and our role as stewards of the current and future stakeholders of Chinatown-International District that we provide the following comments on the WSBLE Draft Environmental Impact Study.

A. Impacts of Fifth Avenue Alternatives are existential for the Chinatown-International District

The DEIS describes and compares the impacts of the Fourth and Fifth Avenue alternatives. After carefully considering the DEIS analyses, we conclude that the impacts of the Fifth Avenue Alternatives are so great, they put many of the community priorities outlined in this letter at risk. Unless Sound Transit can identify another option that moves the construction impacts away from the cultural spine of the Chinatown-International District and/or identifies *substantial* mitigation to avoid or greatly minimize these impacts, we do not believe the Fifth Avenue Alternative and options are acceptable.

Construction of the Fifth Avenue Alternatives would be the most disruptive in the very heart of the Chinatown-International District. They would close key streets for commercial and cultural activity, including King Street and Weller, impacting access to retail businesses for customers and suppliers. They would create noise, dust, truck traffic, and visual impacts that would hamper or prevent community gatherings and activity in Hing Hay Park and other outdoor spaces and affect quality of life for hundreds of residents of Uwajimaya Village, Fujisada Condominium, Publix Building, and Bush Hotel. They would permanently displace the most on-street parking, which is of particular importance to the retail and small business environment in the Chinatown-International District.

While the potential opportunity for Transit Oriented Development associated with the massive disruptions created by the Fifth Avenue alternative and options may be enticing, the community would need assurance in the form of explicit legal commitments that these opportunities would be limited to only those who could ensure retention of community ownership of properties, and not make us more vulnerable to displacement and gentrification.



CIDBIA is the Seattle Department of Transportation permit holder for the Chinatown Gate, in partnership with the Historic Gate Foundation. The Chinatown Gate, located at the heart of the neighborhood on 5th Avenue South and South King Street, is the entrance to the neighborhood and signals to visitors they are in Chinatown. The Gate symbolizes culture, identity, and history for generations of Chinese immigrants who built the Chinatown area. The Gate is one of Seattle's most photographed icons and is used as a tool to market the neighborhood to help support small businesses. The 5th Avenue alternatives would at a minimum reduce visibility and accessibility to the Gate for residents and visitors. We also are concerned about the structural stability of the Gate with years of construction underneath it and around it on the street level.

B. Impacts and benefits from Fourth Avenue alternatives are not equally addressed

The Fourth Avenue alternatives would have direct connections to both Pioneer Square and Chinatown-International District neighborhoods and would facilitate more direct connections between transit modes such as Sounder, Light Rail, Amtrak and private buses. The Jackson Hub concept plans, as well as the community priorities listed in the beginning of this letter both emphasize the neighborhoods' advocacy for improving connections between the neighborhoods, improving the public realm, and activating the Jackson Hub area more intentionally. From our review of the information presented in the DEIS, there appear to be opportunities to realize long-held community goals and regional benefits from a Fourth Avenue alignment, but the analysis lacks the information we need to further understand these opportunities. For example, no formal visual quality analysis was performed for alternatives in the CID segment and there was no discussion of the Chinatown-International District and Pioneer Square as a complete, cohesive neighborhood. An actual visual quality analysis, complete with images and discussion, would allow us to see how station entrances and improvements along 4th Avenue South between S. Jackson Street and Seattle Boulevard would contribute to public realm goals. More visual representation of the scope and scale of proposed tunnel ventilation facilities would aid in our understanding about impacts to the public realm. It would also create an opportunity for Sound Transit to discuss opportunities to enhance connections and cohesiveness between the two neighborhoods in the Social Resources, Community Facilities, and Neighborhood conclusions. Without the more formal analysis, the beneficial impacts of the proposed project and alternatives are not explicitly disclosed and are hard for the reader to conclude.

Additionally, we believe re-activating Union Station to its original purpose as a train station would be a natural fit for this project. As in many large cities across the United States and in many parts of the world, the idea of a "grand central station" signifies a central location for transit, commuters, and accessibility. Union Station could serve as the entry point to Chinatown-International District, Pioneer Square, and Downtown. By serving as the location for



the new light rail station entrance, and a connection between the existing and proposed stations, the revived Union Station would be readied for further activation of the building for more public-facing uses.

C. The Deep Options do not support a 100-year vision for our neighborhoods

We do not believe the deep options—with their elevator-only access and longer transfer times—serve to support the neighborhood or the region. Even a bank of eight elevators will be unable to keep up with crowds during major events. In addition to football, soccer, and baseball games that bring more visitors to Chinatown-ID, CIDBIA attracts thousands of visitors to the neighborhood each year, including culturally significant events such as Lunar New Year. Mechanical problems are not unheard of in the Sound Transit network. Nor will they be viable if there is another global pandemic that makes it unsafe to ride in an elevator with a non-household member. We fear that most people coming to the area from other parts of Seattle or the region will choose to disembark or transfer at a different station with less onerous transfers, which would serve only as a deterrent, and not an attractant to our neighborhoods. The deep options would also make light rail transportation inconvenient for residents of Pioneer Square and the Chinatown-International District, greatly diminishing the Project's purpose and need.

D. Additional Questions and Concerns about DEIS Analysis

- 1. Inconsistencies between Racial Equity Toolkit and DEIS:** The Racial Equity Toolkit commits to an outcome of limiting harmful impacts of the Project and working with impacted communities to identify opportunities to repair past harm. It acknowledges the cumulative harm caused by decades of public infrastructure projects sited and constructed without centering the voices of people of color. Yet while the Environmental Justice analysis references these impacts in the narrative, it does not include them the documentation of the analysis that led to an Environmental Justice conclusion of no disproportionately high and adverse impact (Appendix G, Table 5-4, pages 5-31 through 5-66).

These cumulative impacts are a key concern for many residents and business owners in the Chinatown-International District and Pioneer Square, and they should be explicitly considered as part of the Environmental Justice analysis.

- 2. Need for Clarity on Construction Staging:** The DEIS discloses approximate amount of area necessary for construction staging areas and easements but does not show a construction footprint outline. The property impact maps provided in Appendix L.4 do



not indicate how the properties would be used or the extent of the use (i.e., full or partial acquisitions). Without more clarity on where construction staging would occur or the assumptions of property impacts for construction staging, we cannot adequately assess or compare the impacts of construction to the Chinatown-International District.

- 3. Noise Impacts:** The Noise and Vibration Technical Report states the following: "Commercial and industrial districts are in the Chinatown-International District Segment... Although there are no nearby residential districts near the segment there are mixed use properties with residences in commercial districts, such as Uwajimaya and the Publix Hotel. Residential use properties within commercial districts are treated the same as commercial properties within the city of Seattle." (Appendix N.3, page 6-37) While this may be acceptable by federal noise analysis standards, it is unacceptable from a racial equity standpoint. Sound Transit should conduct a complete operational noise analysis of impacts to residential properties—regardless of whether they are part of a mixed-use building—and commit to mitigation for those impacts.
- 4. Parking Impacts:** The cumulative impacts section of the DEIS asserts that changes to the transit system would reduce the need for parking in the study area. It further states that "the project would remove some of the residential and commercial land uses that created demand for this parking." (DEIS, page 5-7). We believe this conclusion is inappropriate without further consultation with Chinatown-International District and Pioneer Square residents and small business owners. In the Chinatown-International District feedback from community leaders indicate that short-term parking (on-street, <2 hour) is used by people making trips to the Chinatown-International District to shop, visit residents, dine in a restaurant, drive a senior resident to/from appointments, etc. Transit may not be an appropriate or reasonable alternative mode for many of these trips. We urge Sound Transit to conduct further public engagement on this topic and update its analysis in the final EIS to reflect the true impacts of parking losses—particularly on-street parking—for our neighborhood.

Conclusion

We recognize that Chinatown-International District is one component of a full ST3 program, one that is for the benefit of all regional users. In the spirit of advancing the project while advocating for our community, we suggest the following path forward:

Based on review of the current information, we believe that the CID-1a option offers the greatest potential to achieve the community priorities, create direct connections between Pioneer Square and Chinatown International District neighborhoods, and improve transit connections between modes. Furthermore, there appears to be more opportunity to minimize and mitigate traffic impacts through design, construction phasing and staging, and other



engineering technologies than have been studied for Fourth Avenue to date. We believe CID-1a comes the closest to delivering both local and regional benefit while protecting the cultural core of the Chinatown-International District neighborhood.

As we emerge from the most acute impacts of the COVID-19 pandemic, we hope Sound Transit takes the opportunity to better understand and address how adverse effects such as closures of commercial and cultural streets, displacement of businesses and residents, parking losses, construction noise and truck traffic, and other impacts could have on our community, especially in light of the decades of cumulative impacts of major infrastructure projects in Chinatown-International District and Pioneer Square. Infrastructure projects such as this once-in-a-lifetime West Seattle Ballard Link Extension is unfortunately not once in a lifetime for many in Chinatown-International District. We ask the Sound Transit board to consider the impacts to one of the region's most special, unique, and fragile communities and the residents and businesses who call it home.

Sincerely,

Monisha Singh

Monisha Singh
Executive Director
Chinatown-International District Business Improvement Area