



September 27, 2018

Honorable Joe McDermott
ST3 Elected Leadership Group Co-Chair
King County Council Chair
516 Third Ave, Room 1200
Seattle, WA 98104

Delivered via email

Honorable Mike O'Brien
ST3 Elected Leadership Group Co-Chair
Seattle Councilmember
600 Fourth Avenue, 2nd Floor
Seattle, WA 98104

Re: West Seattle and Ballard Link Extensions Level 2 Screen Recommendations

Dear Co-Chairs McDermott and O'Brien,

On behalf of the Port of Seattle (Port) and Northwest Seaport Alliance (NWSA), we write to urge the Elected Leadership Group to incorporate the following comments into your recommendations moving into Level 3. We have strong concerns about certain Level 2 routes and the implications of construction activities. The maritime industry relies on a broad ecosystem of support businesses and supply chain links, hence no one business impact can be considered in isolation. Critical maritime and industrial activities within the Duwamish and Ballard industrial areas must be a core consideration.

As detailed below, some of the potential routes and associated construction activities could affect a wide range of cargo, fishing and other industrial operations, hamper freight movement and ultimately result in a loss of jobs in our community. These businesses are vital to the economic vitality of the region and state.

We fully support Sound Transit's objectives of promoting mobility in our region. Expanding transit opportunities is more important than ever before as Seattle and our region continue to grow. We believe Sound Transit will find a preferred alternative that will move people more efficiently, and with less environmental impact, while also maintaining our economic competitiveness and quality of life.

We appreciate the opportunity that Sound Transit provided for the impacted communities to participate in this process through the Stakeholder Advisory Group (SAG). As a public agency we value their input and work to prioritize the inputs of our constituents. Following on the September 26th SAG meeting, we were pleased to see many of our perspectives reflected in their recommendations. As the ELG proceeds, we ask that our comments be folded in with considerations of the SAG perspectives.

A summary of our comments on the alternatives process to-date is included below, with a more detailed explanation from our staff as an attachment to this letter.

West Seattle and SODO Segments

- Any Spokane Street Corridor alignments, especially going north of the West Seattle Bridge, will pose significant economic, operational and environmental impacts to Port and NWSA facilities. Proposed alignments must ensure those facilities remain fully operational during and after construction, while ensuring access for trucks and rail serving those facilities.

- With respect to the Duwamish crossing, please evaluate an alignment slightly farther south of the representative alignment (far southern tip of Harbor Island) to determine if there are ways to further reduce impacts to existing businesses.
- The SODO alignment on Occidental Avenue should be eliminated because transportation and land use implications. Traffic and freight mobility impacts would exacerbate current congestion and may not be able to be mitigated. In addition, adding a station west of the BNSF mainline could threaten our region's limited resource of industrial lands and displace many of those industrial and maritime businesses. We believe the SAG's recommendation to carry this forward does not accurately reflect the complicated impacts that this alignment would impose.

Interbay/Ballard Segment

- No aerial alignments through Fishermen's Terminal should be considered further because of impacts to terminal operations and repercussions of the fishing industry.
- The 20th Avenue W alignments should be eliminated due to costs, construction issues and impacts.
- Moveable bridges across the ship canal should be eliminated as alternatives as they will not work for transit and could impede maritime mobility.

The Port and NWSA are pleased with the ongoing collaboration with Sound Transit and other key agencies and stakeholders to consider the many alternatives that do not harm the maritime industrial base in Seattle.

Further, we urge the planning and design of the extensions support improved connectivity of the light-rail system to Seattle-Tacoma International Airport. We must all work together to encourage more transit use for passengers and employees of the airport, one of the fastest-growing in the nation.

We look forward to continuing our successful work with Sound Transit toward a system expansion that complements our economic development work for the region and provides new regional transportation solutions for everyone.

Thank you for your consideration and please do not hesitate to contact either one of us.

Sincerely,

Stephen P. Metruck
Executive Director, Port of Seattle

John Wolfe
Chief Executive Officer, Northwest Seaport Alliance

Attached: Detailed Comments

Cc: Elected Leadership Group members, Sound Transit CEO Peter Rogoff, Port of Seattle Commission, Port of Tacoma Commission, Stakeholder Advisory Group members

Detailed Comments regarding Level 2 Screening

West Seattle and SODO Segments

Should the ELG consider carrying forward the alignment north of the West Seattle bridge, against the recommendations of the SAG, the Port and NWSA remain exceedingly concerned that the construction impacts of the West Seattle alternative that crosses the Duwamish River north of the West Seattle Bridge have not been adequately identified. We do not know how harmful the construction impacts would be and whether they could be mitigated. These routes have the potential to create significant negative impacts on cargo and supporting water-dependent logistics functions and result in negative economic impacts across a broad spectrum of maritime industries, which, in turn, stand to materially impact traffic flows for transit and private vehicles. The yet-to-be-determined impacts during the estimated five-year construction period could have long-term impacts on international container cargo operations and significantly impede truck and other traffic in the already congested Spokane Street corridor.

The trucks gates for the NWSA Terminal 18 (T-18) and Terminal 5 (T-5), as well as Westway Feed Products, are accessed via S Spokane Street via I-5/I-90, SR99, W Marginal Way SW, and E Marginal Way S. T-18 is the busiest freight terminal in the region, and S. Spokane Street is the primary route for trucks getting to and from this terminal. It provides access between the container terminal and the railyards (located off E Marginal Way S) as well as access to and from Interstates 5 and 90. Further consideration of an alignment north of the West Seattle Bridge must address the feasibility of committing to points such as the following during construction:

- Good access to the NWSA container terminals and cargo support businesses must be maintained throughout construction for trucks and rail.
- ST will be responsible to mitigate all potential impacts with the subject tenants (and NWSA/POS).
- Temporary business disruptions must be minimized, and business displacement mitigated.
- Traffic flows along the S Spokane Street corridor between W Marginal Way SW and I-5/I-90, will require enforced limitations on construction traffic during commuter and freight peak hours on week days. Unlimited hauling may be possible at night and non-event weekends.
- Construction activities along S Spokane Street that disrupt terminal access must provide alternative access that fully accommodates the same volume and types of traffic, and address other impacts, including:
 - Access/egress and queueing for trucks, trains, emergency vehicles, employees/labor and vendor deliveries
 - Truck parking availability
 - Terminal security fencing restored
- Construction staging/laydown areas should be placed outside the terminal operations areas.
- Construction haul routes should be selected to minimize disruption to freight routes
- Maintain traffic signalization and signage along Spokane Corridor to facilitate freight movement
- Maintain north/south cross streets
- Existing land under elevated structures should remain available for terminal facilities and operations post construction
- No negative post construction impacts to operations will follow delivery of the project.
- The Special Provisions for the project must include agency coordination requirements designed to provide Port and NWSA with the opportunity provide input into construction traffic control plans and other

construction planning efforts with the potential to affect operations and access/egress. We envision regular meetings.

Terminal 5 must also be considered in addition to the possible impacts to T-18. We expect that T-5 will again be operational during Sound Transit's targeted construction window for the West Seattle segment. We hope to be announcing a new tenant by the end of this year and start our own construction for the facility's modernization in 2019 with a target opening by 2023. We anticipate that T-5 will have similar needs as T-18.

Beyond construction, placement of light rail north of the West Seattle Bridge could also cause a negative ripple effect to other Harbor Island logistics and support businesses. While the Duwamish crossing options just south of the West Seattle Bridge would also prove challenging during construction, the potential impact on international cargo operations would be less significant. To that end, we strongly encourage Sound Transit to explore an additional Duwamish crossing on the southern tip of Harbor Island, avoiding the critical BNSF tracks and SSA Marine's headquarters.

Terminal 25 South (T-25S), another Port/NWSA property impacted by a North alignment, is uniquely situated for habitat on the East Waterway. The Port has planned large-scale habitat restoration for this site. As our plans progress to environmental review and permitting actions, construction and operating effects will become more evident.

As we pointed out in our early scoping comment letter, exploration of light rail alternative alignments must consider the facilities that support international and domestic trade flow and broader commerce. The Growth Management Act requires that the region protect, preserve and enhance those Essential Public Facilities and the freight corridors that support them. Container ports' role as an economic engine prompted the creation of a state Growth Management Act (GMA) requirement for the Comprehensive Plan Container Port Element. This was finalized and adopted by the City of Seattle in 2012.

Through SODO, the routing decision must also be cognizant of potential impacts to the nation's trade flows. We believe that the newest "Occidental" option proposed through the SODO area should no longer be considered. One key factor is the likely significant impacts to the SODO transportation system – more specifically, the expected traffic impacts from a station at Occidental and Lander. In addition, the expected significant costs and challenges of a grade separation across a wide span of the BNSF railway is not merited. The GMA requirements and the Container Port Element also apply to the SODO segment. However, we see the need for better transit service for workers on the west side of the BNSF mainline. Moving forward, we hope that Sound Transit will more formally coordinate with Metro Transit to find solutions for improved service for those workers.

Interbay/Ballard Segment

Moving to another key sector of the maritime industry, 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. The terminal offers a full complement of services for commercial fishing and workboats. Additionally, there is year-round and seasonal freshwater recreational moorage. Landside

businesses include a wide range of support services for fishing and commercial maritime activities, retailers, restaurants and offices.

We believe that any elevated alternatives crossing Fishermen's Terminal along the 15th Avenue corridor should no longer be considered, including the moveable bridge, a component of the "representative alignment." The Port has documented many times, in many comment letters, concerns over the impacts to this critical facility at the heart of our \$2 billion regional fishing industry. Through the ELG Level 2 recommendations, we hope that you will do the right thing to protect such an important part of the region's maritime cluster.

We were pleased to hear the SAG acknowledge the impacts of alignments going through Fishermen's Terminal. We support their recommendations to remove the aerial alignments. On Fishermen's Terminal's eastern-most side, Fishing Vessel Owners (FVO) and their two marine ways are situated directly west of the bridge. FVO operation is a profoundly vital shipyard for the local maritime industry: losing the operation would have significant domino impacts on other marine and fishing related businesses. FVO's two marine ways allow boats to be pulled out the water for dry land work, in addition to heavy industrial work of welding, machining, painting and woodworking in FVO's several buildings. The long-tenured FVO staff is deeply experienced and are additionally called off-site to support other Seattle shipyards for special expertise.

FVO is one of the Port of Seattle's oldest tenants, providing services from their current location since 1919. An elevated alignment through Fishermen's Terminal would force FVO to move their operation out of Seattle or close all together and result in the loss of family wage union jobs and Port revenue, as well as impacts to vendors and subcontractor jobs. The convenience of this trusted shipyard is a primary factor in many of the vessels staying at Fishermen's Terminal.

The Port is grateful that Sound Transit's shifted the alignment away from FVO's in-water rail (marine ways). However, we continue to have grave concerns that construction and operations of the link extension with piers and footings of a new bridge will create significant navigational constraints and challenges in access, turning and maneuvering for larger vessels, especially the fishing fleet.

In addition, we appreciate exploration of a 15th Avenue-aligned Tunnel under Fishermen's Terminal. Initial technical conversations between Sound Transit and our staff indicated that threats to FVO still exist due to a needed ventilation shaft. If the ELG chooses to carry forward the Central Interbay / Tunnel / 15th, the potential impact to FVO must be mitigated through additional design in Level 3.

Moving to the far westerly alternatives, "20th/Tunnel/15th" and "20th/Fixed Bridge/15th" alternatives, we support the SAG recommendation and believe those options should no longer be considered into Level 3. Between the impacts to Terminal 91 operations, Salmon Bay Marina and the early projected significant costs of these routes, we expect that other alternatives will provide better opportunities for all stakeholders.

Terminal 91 is home to the Smith Cove Cruise Terminal and the North Pacific Factory Catcher Processor Fishing Fleet. Several on terminal businesses are key to supporting this vital fleet. For these businesses to be successful they require easy on terminal and off terminal movement of trucks and freight. We have concerns that on terminal construction and proposed placement of columns will adversely impact the ability of these businesses

to remain efficient and effective in their support of these vessels and movement of frozen product. It is critical that frozen fish product be able to move by rail and truck in a timely manner from the terminal to its destination. Additionally, Terminal 91 is home to two expanding-cruise-ship berths. Construction laydown and activities near the east gate of the terminal could easily create negative traffic impacts to the 15th/Elliott corridor as cruise passengers are delayed entering or exiting the terminal.

The “Smith Cove” station, near east gate entrance into Terminal 91 (and future Expedia headquarters), bears critical significance for the Port. While we need further details to provide feedback for a preferred station location, our key criteria include:

- Routing opportunities for shuttles serving cruise passengers,
- Employee access to Terminals 91 and 86,
- Traffic flows on 15th and Elliot Avenues West (including transit hub access), and
- Impacts to freight mobility through the corridor and into our facilities.

More broadly around Interbay/Ballard segment, as the SAG recommended, we agree that none of the moveable bridge options should be further considered. The negative impacts to the navigable waterway below and the transit system would be equally detrimental to the public and maritime sector. It should be noted that a broad swath of stakeholders continues to express similar concerns and there has been minimal support for these options.

For the remaining alternatives in the 14th Avenue West corridor and the Ballard terminus, there have been proposals for the alignment to swing west to provide a Ballard station west of 15th Avenue West. As SAG advised, we support the further study of that possibility, including for the 14th Avenue West alignment.

Finally, construction concerns and required mitigation identified in the West Seattle/SODO segments discussion above must also be considered with respect to any alignments through this segment.