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Peter J. Schrappen, CAE
Vice President – Pacific Region

April 28, 2022

Ms. Lauren Smith
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Re: WSBLE Draft Environmental
Impact Statement

Dear Ms. Smith:

On behalf of the American Waterways Operators (AWO), I appreciate the opportunity to comment on the West Seattle and Ballard Link Extensions (WSBLE) draft Environmental Impact Statement (DEIS).

AWO is the tugboat, towboat, and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. Our industry safely and efficiently moves over 665 million tons of cargo each year, including more than 60% of U.S. export grain and significant bulk and containerized cargoes transported along the Pacific Coast. Sixteen AWO member companies are headquartered in Washington, and many more operate tugboats, towboats, tank barges, and deck barges in Washington waters. Towing vessels move tens of millions of tons of freight every year on Washington waterways, reducing congestion on the state's highways and railroads while producing fewer pollutants than trucks and trains. In addition, harbor and ship assist tugboats perform shipdocking, tanker escort, and fueling services in Washington's harbors and ports.

AWO has serious concerns about the bridge alternatives for the Interbay/Ballard segment of the WBSLE as outlined on pages 38 & 39 of the DEIS. Alternative IBB-1a, IBB-1B, and IBB-3 would each create a serious obstruction to navigation in the Lake Washington Ship Canal (LWSC). Multiple AWO members are located east of the Ballard Bridge, and they would be severely harmed by these alternatives. The proposed bridges would introduce a vertical navigation clearance limit where one does not currently exist and a potential horizontal navigation clearance limit, if not properly aligned with the Ballard Bridge.

Impeding marine traffic through the LWSC could shutter businesses who depend on the waterway for their operations. This would extend to the numerous businesses throughout the Pacific Northwest and beyond that depend on marine transportation to get their goods to market. It would damage Washington's thriving export trade and impair delicate supply chains.

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The proposed alternatives would also cause undue harm to communities in Alaska that depend on barge transportation for essential goods like food and fuel.

AWO strongly supports alternatives IBB-2a and IBB-2b. Building a tunnel beneath the LWSC would provide minimum impact to vessel operators and the industries and communities they serve while allowing Sound Transit to expand the regional light rail system. Constructing a tunnel would not interrupt maritime operations, and a completed tunnel would not impede safe navigation of the LWSC.

For the Duwamish Segment of the WSBLE, as outlined on pages 10-12, AWO's comments complement the letter sent from Pacific Merchant Shipping Association (PMSA). We oppose the DUW-2 alternative. The northern crossing of the Duwamish Waterway and Harbor Island would interrupt operations at Terminal 5 and displace important maritime businesses. The southern crossings represented by preferred alternative DUW-1a would be less disruptive to maritime operations. Furthermore, avoiding additional obstructions, such as guideway columns, would limit disruptions to maritime companies who operate on the Duwamish.

The DEIS process requires an examination of the impacts to commercial resources. Alternatives IBB-1a, IBB-1B, and IBB-3 would harm Washington's \$38 billion maritime economy as well as the wider regional economy. The report should also consider the environmental impact of shifting freight off the waterways and onto landside modes. Barge transportation emits 30% less greenhouse gas emissions than rail and more than 1,000% less than trucks. If this plan displaces barge operators, those emission reductions would be eliminated, increasing the carbon intensity of transportation in the Pacific Northwest.

Thank you for the opportunity to comment on an issue that is of great importance to AWO members. The decision will impact local maritime companies, their customers, the regional and national economy, and the supply chain. AWO would gladly answer any questions or provide further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Schrapfen". The signature is fluid and cursive, with a large initial "P" and a long, sweeping underline.

Peter Schrapfen
Vice President – Pacific Region