

WING LUKE MUSEUM

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, the staff of the Wing Luke Museum of the Asian Pacific American Experience (WLM), are pleased to provide these comments on the Draft Environmental Impact Statement (DEIS) for the West Seattle and Ballard Link Extensions (WSBLE) Project, notice of which was issued on January 28, 2022.

ABOUT THE WING LUKE MUSEUM

The mission of the Wing Luke Museum of the Asian Pacific American Experience (WLM) is to connect everyone to the dynamic history, cultures, and art of Asian Pacific Americans through vivid storytelling and inspiring experiences to advance racial and social equity. Founded in 1966 as a tribute to community hero Wing Luke, an immigrant and first person of color elected to Seattle's City Council in 1962, WLM has served as a community anchor within Seattle's historic Chinatown-International District (CID) for over 50 years. Deeply rooted in our community, our exhibition, gallery and neighborhood tours, public programs and events, and permanent collections are reflective of the widely ranged interests and concerns of the many who call the CID home. Programs are designed to encourage active participation in preserving and promoting Asian American, Native Hawaiian, and Pacific Islander (AANHPI) heritage and culture that have impacted and continue to shape the neighborhood's, city's, and region's cultural landscape.

Our 2008 move into the rehabilitated 1910 East Kong Yick Building/Freeman Hotel enabled us to expand our primary activities including neighborhood revitalization efforts. The Museum now stands as the second largest economic driver for the CID, partnering with 65+ small businesses, and attracting patrons to the family-owned businesses and restaurants. WLM gives voice to traditionally underrepresented populations and directly engages everyday community members through our refined Community Advisory Committees (CACs) approach. This programming development process facilitates community members to tell their own stories, outreach within their networks, and produce ongoing exhibitions and programs, resulting in generational community ownership and stewardship, for our Museum and for our neighborhood. Nationally recognized, this method has been effective in growing a diverse visitorship, inspiring participation, and furthering civic engagement.

WLM is a Smithsonian Institution affiliate and was designated a National Park Service Affiliated Area in 2012. This designation resulted from an Obama administration initiative to transform the federal inventory of cultural resources to more completely reflect the whole American cultures, rather than the 94% Euro-American character of current federal resources. The NPS affiliation includes the Museum within the pantheon of national treasures like Mt. Rainier and Gettysburg Battlefield. The recent NPS

Asian American and Pacific Islander Heritage Theme Study (2019) reflects the importance of preserving AANHPI places and stories; WLM led its Pacific Northwest launch and continues to advance its priorities. WLM was named an American Cultural Treasure in 2020 by the Ford Foundation, one of 20 arts organizations of color nationwide to be awarded as recognition of our role in America's cultural landscape and a boost for survival through the pandemic years.

WLM remains the nation's only museum that shares the pan-AANHPI experience encompassing over 26 ethnic groups, and comprising 18% of King County population, 14% of Snohomish County, and 8% of Pierce County, the largest community of color in the region. Our primary audience is 46% AANHPI and 47% white, 4% Latino, 3% African American; 10% of visitors also identified as mixed/other. Of the 75,000 annual visitors pre-pandemic, we reached 20,000 students onsite each year and provided free tours for students who qualify for federal free/reduced lunch. Our free out-of-school programs for middle and high school students, TeensWay and YouthCAN, serve refugee, immigrant and/or low-income AANHPI youth, help build arts and leadership skills as well as strong intergenerational relationships, and cultivate the next generation of leaders within the CID.

Following in the footsteps of past Civil Rights Movement organizers and carrying out our mission to advance racial and social equity, WLM has extended our relationships to other communities of color, working to build solidarity and dismantle structural racism. The Museum has served over the past seven years as a founding member of a collaboration of three communities of color in Seattle, all in neighborhoods significantly threatened by displacement, and dedicated to developing neighborhood assets to build community, through knowledge sharing, shared policy analysis, and joint advocacy. This Race and Social Equity Taskforce (RSET) unified African American and AANHPI communities to support each other. RSET's participation in developing Seattle's 10-year comprehensive growth/investment plan (2016) resulted in producing an Equity Analysis, Equitable Development Implementation (EDI) Plan, and a funded financing plan with specified community-owned projects for implementation.

As such, we hold EDI values, including centering communities most impacted by displacement; community-driven strategies led by community self-determination, influence, and leadership; recognition of the complexity of community needs such as economic development, affordable housing, cultural development, education, healthcare, and food sovereignty; acknowledging historic injustices to address systemic racism and institutional barriers; strong, accountable, accessible, transparent, and culturally appropriate solutions; and valuing of existing community and cultural assets. We also affirm Sound Transit and the City of Seattle's commitment through their Racial Equity Toolkit (RET) process to: limit harmful impacts of the WSBLE Project and work with impacted communities to identify opportunities to repair past harm; maximize connections for all users; and ensure that community shapes the decisions that impact them, through self-determination and with a 100-year vision for future generations.

SUMMARY CONCLUSIONS COMMON TO ALL ALTERNATIVES

Upon review of the DEIS, participation in many Sound Transit workshops, and in light of our experience and expertise, we have reached the following conclusions common to all alternatives for the Chinatown-International District Segment:

- The DEIS does not adequately encompass the historic reality of past public policies and actions, the everyday lived legacy of those actions to the present-day, and the subsequent real threats to future survival. As such, any conclusions made fall short of depth and breadth of the cumulative impacts from the WSBLE Project.

- The DEIS relies on limited information to evaluate historic and archaeological resources as a result of inequitable practices within the preservation field. Further information needs to be gathered and considered to make a better determination of impacts.
- The DEIS does not adequately recognize the uniqueness of the CID nor takes into consideration emergent threats to its neighborhood cohesion, all the more made evident during the pandemic.
- The Final EIS requires greater clarification on multiple fronts to better assess construction impacts.

DETAIL OF CALL FOR FURTHER EXPLORATIONS

Chapter 5: Cumulative Impacts: Look to the past to understand the present and lead the future

The DEIS does not adequately encompass the historic reality of past public policies and actions, the everyday lived legacy of those actions to the present-day, and the subsequent real threats to future survival. As such, any conclusions made fall short of depth and breadth of the cumulative impacts from the WSBLE Project.

While Section 5.2.2 accounts for some of the past public infrastructure projects impacting the CID, it needs to go further acknowledging the overarching context of race-based Exclusion, which was made manifest in federal and state laws and executive orders, such as the 1886 Chinese Exclusion Act, 1864/1921 Alien Land Laws, and 1942 EO9066 forced removal of Japanese Americans, alongside local ordinances, be it zoning which limited the growth of families by restricting the CID to commercial/industrial and prohibiting single-family home construction or fire code legislation leading to the abandonment of upper-story historic hotels and apartments, destabilizing the neighborhood, and resulting in the CID having the highest concentration of vacant buildings in the city. This same section fails to acknowledge the cumulative impact of past public infrastructure projects, decade after decade, from the 1949 Charles Street Maintenance Facility, to the 1960s I-5 Freeway, to the 1972 Kingdome, to the 1999 baseball stadium, to the 2002 football stadium, to the 2015 Streetcar main and spur line.

The City of Seattle's Equitable Development Initiative acknowledges that historic policies and practices of housing exclusion (aka redlining) has led to present-day access to opportunity and risk of displacement. Indeed, as stated in the City of Seattle's 2016 Equitable Development Implementation Plan, in regard to the CID, *"the cultural anchors of this neighborhood are subject to displacement pressures from re-development as well as through the loss of existing buildings due to building failure whether catastrophic or through long-term disintegration."* This document rates the neighborhood as *"very high risk of displacement, scoring 31.0 out of a citywide risk range of 8 – 32.7."* (City of Seattle 2016 Equitable Development Implementation Plan, page 49). The conclusion made in Section 5.4.2 that the "adverse cumulative impact from property acquisition is not expected" is inherently faulty because it fails to take into account the existing present-day conditions of high displacement within the CID and the cascading effect additional displacement can have on an already fragile, strained neighborhood.

Similarly, although Section 5.4.5.1 recounts past development and policies that have resulted in the displacement of CID communities, it fails to adequately quantify those losses and describe their ongoing impacts. The Final Environmental Impact Statement should include more specific information, including whenever possible, numbers of people, businesses, organizations displaced/impacted, and wherever possible, maps and photographs showing the location, type, and scale of the properties. Descriptions of the ongoing losses/impacts as a result of these past actions should be included. By doing so, Sound Transit and communities will have fuller information to evaluate strategies and base decisions.

Chapter 5: Cumulative Impacts: Apply better practices to evaluate historic and archaeological resources

The DEIS relies on limited information to evaluate historic and archaeological resources as a result of inequitable practices within the preservation field. Further information needs to be gathered and considered to make a better determination of impacts.

When it comes to historic and archaeological resources, sources for the DEIS refer only to the National Historic Register listing and the Washington State WISAARD database, sources that the National Park Service and Washington State Department of Archaeology and Historic Preservation (DAHP) would both acknowledge have their limitations, especially when it comes to communities of color. Indeed, in May 2018, the National Park Service itself published “Finding a Path Forward,” a theme study from the National Historic Landmarks Program centering on Asian American and Pacific Islander sites and stories, as a step to address its shortfalls. DAHP has been actively seeking support to further its work through the National Park Service Underrepresented Community Grants program, including a 2020 award to conduct a Filipino American Statewide Context and Survey and a 2022 award focused on Chinese American Exclusion in Washington State.

Leaders in preservation also point out the need to acknowledge both tangible and intangible cultural heritage, broadening preservation practices beyond the architecture, and taking into account the lived experiences and stories of the people. Witness, the National Park Service’s own focus on “Tangible and Intangible Cultural Heritage” as integral to its mission (<https://www.nps.gov/articles/tangible-cultural-heritage.htm>); the National Trust for Historic Preservation’s National Impact Agenda for the Preservation Movement also calls for the updating and addition of “new preservation tools and practices so more people can recognize, interpret, protect, and activate a larger and more diverse set of historic places and landscapes” (<https://savingplaces.org/goal-expanded-tools#.YmRrjtrMJPY>).

While we agree that all alternatives would have an adverse effect on historic properties, the identification of what is “historic” and concurrently, what is not, is faulty because of this flawed data. Summary Tables within 4.3.16 are too narrow in scope and consideration. The determination that individual historic properties are not adversely affected just because they are not directly demolished by the WSBLE Project also fails to take into consideration the interconnectedness of these historic properties to tell a fuller story and create an immersive experience. The absence of consideration for two heritage trails created in partnership with the National Park Service, including the Japanese American Remembrance Trail and the Redlining Heritage Trail, further reflects shortcomings in the DEIS.

For WLM ourselves, while we occupy the 1910 East Kong Yick Building/Freeman Hotel, we regard the CID as our “largest exhibit,” have been working to preserve and activate historic properties beyond our walls including Canton and Maynard Alleys, Chiyo’s Garden and Nihonmachi Alley, United States Immigrant Station and Assay Office – Seattle, and the William Eng Residence, and bring visitors, families, and school groups on neighborhood tours year-round, with many sites and businesses slated for demolition or directly impacted by construction under the current WSBLE Project alternatives. Previous WLM visitor surveys indicate that the experience of the CID overall as an authentic, immersive cultural destination is of primary importance to our visitors, where they noted planning a trip to the CID first and folding in a visit to the Museum second as part of that overall experience. Any disintegration of the cultural, historic fabric of our neighborhood, which is already suffering dissolution, will have direct impacts to our own visitorship, revenue, and sustainability over the long-term.

Chapter 4: Neighborhood Cohesion and Social Resources: Protect the treasure that we have
The DEIS does not adequately recognize the uniqueness of the CID nor takes into consideration emergent threats to its neighborhood cohesion, all the more made evident during the pandemic.

We concur with Section 4.3.4.1.1 that concludes that the CID has high neighborhood cohesion but disagree with the conclusion in Section 4.3.4.3.3 that the WSBLE Project would not directly impact neighborhood cohesion. Reasons for this include: 1) the geographic size and density of the CID indicates that any disruption to it will have a higher impact on the neighborhood overall; 2) residential spaces, businesses, cultural spaces, and community organizations are interwoven into a tight-knit interdependent network, a legacy of our historic roots as an “ethnic enclave,” and any disruption to that network will have ripple effects throughout the system; and 3) since the CID has been a place of respite and belonging in the face of racism, discrimination, and exclusion, harm to any part of the CID (all the more amplified by the perpetuation of past harms) threatens the sense of belonging within the neighborhood overall.

Tragically, the sense of belonging for AANHPIs within the U.S., our region, our city, and even our neighborhood has been broken by the rise in anti-Asian American violence during the pandemic. Where we once considered a safe beacon is now conflated with verbal threats and physical assault; continued boarded up storefronts serve as stark reminders of disregard for and disinvestment in the CID.

Attention to caring for and cultivating this sense of belonging needs to be better attended to throughout the DEIS. For example, Section 4.3.17.3.2 concludes that none of the CID Segment alternatives would have long-term impacts to parks and recreational resources, but if elders and youth no longer feel a sense of belonging in the CID then parks such as Hing Hay Park and the Donnie Chin International Children’s Park will lose the people that make them the special places that they are. Similarly, enhancements to the public realm, including directly at the station as well as along routes to it, should foster a sense of belonging, integrating community driven public art designed by community artists, especially those connected to the CID.

Construction Impacts: Clarification needed on multiple fronts

The Final EIS requires greater clarification on multiple fronts to better assess construction impacts. As they relate to the WLM (and concurrently to the CID overall), they include:

- **Insufficient information and inadequate consideration of re-routing of traffic and buses through the CID in Transportation analysis.** This will impact pedestrian safety and neighborhood access for our visitors and school groups, who travel to WLM by public transportation as well as private vehicles, as well as our neighborhood tours who walk throughout the district.
- **Insufficient consideration of vibration impacts in Noise and Vibrations analysis.** With the potential re-routing of buses through the CID, we are especially concerned about vibration impacts to our building, especially related to our areaways.
- **Inadequate consideration of impacts of stadium events in Transportation analysis.** WLM experiences direct impacts due to stadium event traffic. The Transportation analysis needs to take this into account as well.
- **Underestimation of the impacts of parking losses.** Parking in the CID has long been an issue and is a top consideration for our visitors (especially families with young toddlers) and community volunteers coming to the Museum. We have witnessed increased concern related to parking with current safety challenges in the CID.

- **Insufficient Visual and Noise Impact analysis.** Our neighborhood tours are all about sharing the sights and sounds of the CID, whether taking in the view up and down King Street from our 1910 hotel to the Chinatown Gate to King Street Station, standing in the middle of Hing Hay Park to take in its Dragon Mural, Grand Pavilion, Celebrate Happiness Lantern, and Artistic Gateway, or reflecting on the experience of new arrivals or forced removal of others while standing outside King Street and Union Stations. Each tour site also includes guides verbally sharing about the history, as well as asking participants to discuss with the group and introducing them to our neighborhood businessowners.

CONCLUSION

Thank you for this opportunity to respond to the DEIS. As we have set forth, without deeper exploration of past actions and their impacts on the present to establish a more accurate context for assessing the future, conclusions within the DEIS that claim most cumulative impacts would occur only during project construction rather than project operation or that the project would not directly impact neighborhood cohesion are inherently flawed.

Due to the overwhelming cumulative impacts and threats to neighborhood cohesion, built up over 150 years and amplified by the WSBLE Project, furthering and cascading historical, institutional racism, we are concluding our response with a call for exploration of options for refinements to the proposed alternatives beyond what typically occurs from a DEIS to Final EIS that will not result in displacement within the CID. As our response indicates, without exploration of these refinements, the harm to cultural resources and social cohesiveness is far too great to risk the survival of the CID, a treasured place of belonging and an authentic historic cultural district like no other in the nation. Additionally, due to the direct proximity of the 5th Avenue South alternatives within the CID and along its King Street core, we find the 5th Avenue South alternatives unacceptable and call for the options for refinements to move away from the cultural, economic heartline of the CID.

We also call for additional study by external consultants, working with community partners, to address the numerous requests for additional information or exploration, whether related to historic and archaeological resources or the multiple fronts for construction impacts. Racial equity values are incumbent on centering communities most impacted and putting them in decision-making roles with clear accountability.

CID stakeholders, including us as the Wing Luke Museum, have long been pulling up our sleeves to do the hard work to ensure that the CID is the treasure we have all come to love. We have a wealth of planning resources and experience to draw from, whether the 2016 South Jackson Street Connections report, 2019 Jackson Hub concept plans, 2019 Historic South Downtown Community Priorities list, or the forthcoming 2022-2032 CID Neighborhood Strategic Plan. We are eager to continue work on refinements to the WSBLE Project that do not lead to our community's displacement and strategies that mitigate impacts, build on our cultural assets, and elevate the CID, all integral to our 100-year vision for future generations.

Sincerely,



Joël Barraquiel Tan
Executive Director



4/26/2022
Cassie Chinn
Deputy Executive Director