



To: Sound Transit Board
From: Transit Access Stakeholders
Re: Sound Transit 3 - Draft System Plan and Policies
Date: January 21, 2016

Dear Sound Transit Board Members,

Thank you for the opportunity to comment on the Sound Transit 3 (ST3) system plan and policies. The Transit Access Stakeholder group is a growing coalition of organizations that are interested in connecting the Puget Sound region through affordable, reliable, and sustainable transit. Together, we represent environmental, land use, active transportation, social justice, affordable housing, and transit stakeholders, with thousands of members in the central Puget Sound region. We look forward to mobilizing our memberships in support of a Sound Transit 3 system plan and supporting policies that are consistent with the following framework:

Go Big! Create an Expansive and Visionary System Plan

We support a bold and visionary ST3 system plan that brings affordable and sustainable transportation options to all subareas. The people of Puget Sound are excited for high capacity transit that offers a reliable, cost-effective alternative to increasingly congested corridors. We urge the Sound Transit Board not to develop a plan that picks between jurisdictions that are eager and prepared for such investments, and instead develop a plan that is able to serve more neighborhoods of all incomes and demographics. We believe an ambitious plan can win at the ballot.

Increase Multimodal Access Funding

We support an increase in investments for local transit, walking and biking access to high capacity transit. Investments in transit, walking, and biking access are an affordable, effective, and sustainable way to attract riders. Research shows that encouraging riders to access transit on foot or by bike can be a lower-cost way to increase ridership. In some locations, local bus service has the potential to bring the most riders to stations.

Sound Transit should prioritize funding for local transit, walking and biking access to high capacity transit over parking by increasing both the overall allocation to the system access fund and the specific allocation for transit integration, access, and information within each project. The system access fund should be large enough to cover both additional community-identified improvements for new stations as well as retrofits for all existing stations that need transit and non-motorized access improvements.

Sound Transit also should scale the size of the System Access Program to the size and duration of the final ST3 system plan. The current R-05 is the baseline for access with a 15-year plan. If Sound Transit moves forward with a system plan that makes ambitious investments in all sub-areas over a longer time horizon, the funding in R-05 needs to increase in direct proportion to these investments in order to ensure adequate access to future transit facilities.

Make Smart Investments in Parking, and Use Pricing to Manage Demand

We think Sound Transit should plan for and build less parking for each project, increasing parking only when the need for parking is demonstrated. This approach allows for changes in density that will occur around station areas as land use zoning and development changes over time before light rail arrives and as the network is built out. We believe that excessive spending on parking disproportionately benefits white people and higher-income populations: people with low-incomes and people of color in Washington are still much less likely to own a car.

We urge Sound Transit to price and manage parking at all current and future park-and-ride lots. Parking management can help spread passenger demand across the day, thus lowering operating costs by requiring fewer vehicles and drivers during peak periods. Pricing and managing parking can also help achieve social equity goals by providing predictable access to a spot and defraying the costs of building and operating park-and-rides. Without fees, these costs are fully borne by all users, including people arriving by foot, bike, or bus. Additionally, in order to ensure equitable access, ORCA LIFT riders should pay a lower parking rate. Unpriced parking will attract too much vehicle traffic and reduce the attractiveness and likelihood of transit-oriented development.

We also urge Sound Transit to find ways to use existing parking capacity before building new capacity. For example, in the South corridor, approximately 9,000 new stalls are included in the draft project list, yet the average utilization for Park & Rides in the South district currently is often under 70 percent. Sound Transit should look at opportunities to lease parking from partner agencies, jurisdictions, or nearby businesses, rather than building new structures, wherever possible. This approach is typically cheaper than construction, and makes it easier to reduce parking when supply exceeds demand or station areas transform with dense, walkable residential and commercial development.

Prioritize Affordable Housing in Development Decisions

Sound Transit should prioritize affordable housing in the use and disposal of its land. By supporting and prioritizing affordable housing, Sound Transit can play a critical role in promoting equitable development in high opportunity transit-connected areas, stimulating redevelopment, increasing ridership, and building much needed affordable homes. Aligning land disposition/acquisition policies and affordable housing goals provides local flexibility, creates government efficiencies, and puts public property to its highest and best use. The State Legislature has already required, in RCW 81.112.350, that Sound Transit sell 80% of its surplus land for affordable housing use. Additionally, Sound Transit is required to put \$20 million in a revolving acquisition loan fund to acquire additional sites for affordable housing near transit.

Sound Transit should develop a clear and predictable process for implementing RCW 81.112.350 and maximizing affordable housing outcomes by:

- Removing fair market value requirements on surplus property and better utilizing federally authorized tools such as joint developments, land leasing, and liquidating federal interests.
- Providing favorable sale & development terms for affordable housing developers and organizations acquiring land for affordable housing.
- Planning for and acquiring sites that can be used effectively to promote future TOD, and align land purchasing decisions with affordable housing and land banking actors when possible.
- Updating disposition policies and increasing staff development expertise to better enable nonprofit housing providers and land banking organizations to purchase developable land in and around stations prior to cost increases.
- Maximizing affordable housing potential by ensuring disposition sites are large and regularly shaped.
- Eliminating any assumptions of surplus land sale profits in financial planning.
- Developing minimum standards for sites acquired with loan fund dollars.
- Creating job quality standards for developments at surplus TOD sites and sites acquired through revolving loan fund to promote healthy, accessible, living wage jobs near transit.
- Ensuring that organizations and developers with strong ties to community (alongside development expertise) be competitive in the bidding process. Community partners are better able to understand the holistic needs of a low-income community, immigrants, refugees and people of color and are the most knowledgeable about what makes equitable TOD successful.

Maximize Ridership and Potential for Equitable Transit-Oriented Development and Density

We strongly believe that the System Plan should include robust policies, projects, investments, and alignments that maximize potential for equitable transit-oriented development (TOD) and increased density. Recent studies show that people are more likely to take transit to work if their job and housing is located near transit. Studies show also that people of middle to lower income are more likely to take transit than those with higher incomes. Promoting a mix of jobs, services, and affordable housing around transit stations and hubs is, therefore, critical to increasing ridership as well as to ensuring everyone access to opportunity. Prioritizing equitable TOD also decreases reliance on travel by car, reducing single occupancy vehicles and greenhouse gas emissions (GHG). Moreover, recent studies have found, that availability of affordable housing near transit more effectively increases ridership than market-rate housing.

Sound Transit should maximize potential for equitable TOD means by:

- Selecting alignments and investing in station locations that can support mixed development.
- Building in sufficient funds for multimodal access and TOD development to each station.
- Connecting areas with an existing mix of development.
- Prioritizing contracting with developers that will build affordable housing.
- Actively working to prevent residential and commercial displacement, especially in lower-income, communities of color, immigrants and refugees.
- Supporting equitable TOD through land purchases that are the right size for future development and disposition policies that ensure land can be developed when stations are built or soon after completion.
- Considering access costs when evaluating alignments. Freeway alignments and other access challenged alignments should require analysis and inclusion of multimodal access costs as a mitigation need.

Sound Transit should also develop internal prioritization frameworks that incentivize such policies at the local level and reward jurisdictions that have planned for equitable transit communities. Specifically, we recommend that Sound Transit compare the potential number of jobs and housing units within one quarter mile of stations, when selecting alignments and station locations.

Sound Transit can best provide reliable transit service that connects the most users with the most destinations if it focuses on reaching and connecting dense urban areas across the region. Sound Transit should focus on serving transit centers, as well as schools, hospitals, and large employment centers with high ridership potential. For example, we strongly support option 1 or 2 for Ballard to Downtown Seattle light rail, which are grade-separated and serve South Lake Union, because this route is projected to attract more than 100,000 riders in the corridor.

Use a Race and Social Justice Lens in Decision Making

Sound Transit should make an extra effort to bring reliable, high-frequency, and accessible service to low-income households and communities of color, both of which are disproportionately transit-dependent, underserved, and negatively impacted by transit investments. This may mean providing light rail service in these areas, or it may mean ensuring smooth system integration with local bus service. Improving access to and from these communities can increase opportunities for employment and affordable housing, and can improve health, economic, and social outcomes for the communities historically left behind. Because access to reliable transportation is the single most important factor in escaping poverty, Sound Transit has the opportunity to significantly improve quality of life for communities throughout the Puget Sound. Like with other stations that have these characteristics, we strongly support funding the Graham Street infill station. The Graham Street station area is a busy commercial junction with a middle school, important cultural anchors, locally-serving businesses, affordable housing and community centers in an area that is 81% people of color. Community leaders view the station as critical to fulfilling neighborhood plans, adding substantial ridership for Sound Transit, and serving as a model for community-driven TOD.

Maximize Reliability

Sound Transit should choose projects and alignments with exclusive right-of-way, and grade separated where possible. This ensures that light rail will remain a competitive mode of transportation even as the region grows and congestion increases. For example, we strongly support the construction of a new transit tunnel in Downtown Seattle, which will provide the opportunity for increased train frequency and capacity for higher ridership while avoiding congested downtown roads. When at grade, Sound Transit should invest in safety measures that adhere to universal design standards in order to maximize safe access to transit.

Adopt a Community Engagement and Outcomes Policy

Sound Transit should develop and adopt an explicit community engagement and outcomes policy that lays out best practices for expanding engagement with low-income communities, people of color, immigrants and refugees earlier in and throughout the planning process. Achieving equity outcomes – and optimizing ridership – will succeed only by providing diverse communities with equal opportunities to participate in and influence the planning process. Laying out steps to create and sustain meaningful relationships with community leaders and social services organizations, which will help Sound Transit staff understand language and cultural differences that may shape the way that the agency engages with communities and conducts planning outreach is key to this process.

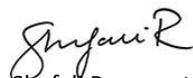
Plan for the Future

Sound Transit should develop the system plan in a way that will best serve our growing region in the future by:

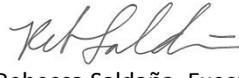
- Designing alignments and stations that make it easy to expand lines and create new junctions;
- Making cost-effective investments that will allow ST to do more with the money they have, accommodating more growth in the region over time;
- Increasing funding for and ensuring policies support early recruitment for apprenticeship programs so that we have a local workforce in place that is ready to tackle ST3 construction **Sound Transit should look into new grant opportunities for workforce development in the FAST Act;**
- Locating in dense areas with the best potential for TOD in order to connect the most people with the most jobs, reducing GHGs and helping meet long-term climate and growth management goals; and
- Planning for contingent funding to build out the system further if projects come in under budget or additional federal, state or local matching funding is found. This should also include identifying potential projects in all subareas, and doing early planning that can inform decision making for ST3.

Thank you for the opportunity to share these comments. This is a very important planning process, and we look forward to working with you to ensure the success of Sound Transit 3.

Sincerely,



Shefali Ranganathan, Executive Director
Transportation Choices



Rebecca Saldaña, Executive Director
Puget Sound Sage



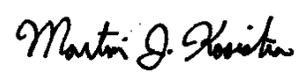
Rich Stolz, Executive Director
OneAmerica



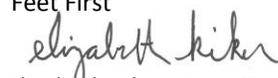
Lisa Quinn, Executive Director
Feet First



Hilary Franz, Executive Director
Futurewise



Marty Kooistra, Executive Director
Housing Development Consortium



Elizabeth Kiker, Executive Director
Cascade Bicycle Club



Gene Duvernoy, President and CEO
Forterra



Tim Gould, Volunteer Chair
Transportation &
Land Use Committee
Sierra Club



Keith Kyle, Board President
Seattle Subway