



May 1, 2019

TO: Sound Transit Staff
FROM: Transportation Choices Coalition

Dear Tacoma Dome Link Extension EIS Staff,

Thank you for the opportunity to comment on the scoping of the Tacoma Dome Link Extension Environmental Impact Statement. Transportation Choices Coalition strongly supports connecting the Puget Sound region through affordable, reliable, accessible, and sustainable transit, supported by excellent modal integration and station access. TCC also supports the missions and comments submitted by Downtown on the Go, the Puyallup Watershed Initiative Active Transportation Community of Interest and Futurewise.

Throughout the development of various ST3 projects, TCC has advocated based on the following values:

- Maximize equitable TOD and affordable housing potential
- Integrate transit, bike, and walking networks
- Prioritize race and social justice
- Ensure travel reliability
- Minimize displacement
- Build a system that looks to the future
- Accessibility for all users, especially those with disabilities

Given these values, we offer the following comments regarding impacts to be studied:

Station Access and Mobility

When easily accessible, light rail provides a very safe way to travel compared to driving; better access to transit for wheelchair users; and coupled with easy and safe routes to walk and bike to trains, an opportunity for active transportation. We would like to see health and safety incorporated into the purpose and need statements, especially as they relate to station access and integration with other transportation networks. Maximizing the investment of light rail depends on excellent station access, and safe, comfortable and convenient connections to other multimodal networks. Ease and comfort of access to the system translates into more ridership, which should be a guiding principle in selecting among project alternatives for all sections of the project. Health and safety impacts must be studied throughout all access and integration issues, as they are fundamental to the usability of the system. In addition we offer the following comments:

- **Station access** - Intuitively and seamlessly finding and getting into the station is critical to the success of light rail. Study should include number of entrances/exits to stations and station visibility (stations should be designed and located such that they are highly visible, including details that are visually distinctive). The number of at grade crossings, and the quality of crossings (ie; signal timing, crossing distance, etc) to reach stations should also be studied.

Crossings not only impact rail reliability, but the safety of users trying to access the station on foot or bike using crosswalks, putting them in the way of both cars as well as trains.

- The “scope” of station access must be flexible based on each station area. For example, study of station access in East Tacoma must include a broad geographic area and examine multiple options for safe and comfortable walking and biking passage under I-5.
- **Transit transfers** - Fast and convenient transfers from light rail to bus, and heavy or commuter rail are integral to creating a function system. Study impacts to transfer times, ease of transfers (platform to platform transfers are ideal), multiple transfer options (stairs, multiple elevators on each side of the platform in case one elevator is out of service, escalators, escalators), direct connections, how many crosswalks and what is the “level of service” for transfers.
- **Integration with other modes** - Whether certain alignments help establish new networks, remove portions of existing networks, or create more dangerous crossings and access is critical information. ST should study the potential for direct connections between stations and planned/existing walk/bike facilities. Those facilities should include both neighborhood greenways and protected bike lanes, but should also acknowledge the difference between those facility types, in terms of how safe and comfortable they are to a range of user types (age, language, ethnicity, gender, race, ability). High-quality bike parking, including long- and short-term parking for individually owned bikes, and space for on-demand micro-mobility services must be appropriately designed (all covered; long term parking must be secure) located in highly accessible locations at all stations, in such a way as to not impede pedestrian flow.
- **Access mitigation for all ages and abilities.** During construction or as part of the final alignment, existing biking and walking networks will be impacted, thus creating inconvenient or potentially dangerous multimodal access. Ensuring safe, comfortable, and convenient interim and long-term passage for people biking and walking, paying special attention to individuals with any sensory or ambulatory impairment, is critical mitigation. Proper wayfinding and robust communications, legible to all communities regardless of English language ability is essential.

A Future-Oriented System

The buildout of this system must be considered as a multi-generational investment that will reach far beyond the geographic footprint of the Tacoma Dome line. Our region is projected to grow by 1.8 million by 2050. As such, identifying impacts to the future buildout or connectivity of this system is imperative. We would like to see the following studied and assessed:

- **Future light rail expansion** - Study the potential opportunities and limitations of station placement and alternative placement in terms of future light rail expansion. Disclose any alternatives that would hinder future expansion.
- **Future bus/station integration** - Study growth potential for feeder service at all station locations, especially at line termini, where future light rail service is decades away. Ensure that stations are placed and designed with future bus feeder service in mind.
- **Future station capacity** - Using projected population growth, study the impacts to station capacity. Consider how station planning will accommodate increased population and ridership, including platform size, entry/egress, payment systems,
- **Future land use** - Consider city comprehensive plans, long-term growth patterns, the effects of regional objectives that can affect city zoning and land designations such as Vision 2050, and trends in the areas of stations and alignments to help maximize the potential for transit-oriented development. Select compatible designs for the system stations and alignments that will serve the needs of the community as well as provide greater access to opportunity to more communities.

- **Flexible design for developing transportation technologies** - Considering the rapid evolution of transportation technologies, station design should, to the extent possible, be future-proofed for flexibility. We know that the future light rail system will be integral to future mobility; but we do not know how the advancement of autonomous vehicles, shared services, micromobility, etc. will change, shape or require flexibility in light rail access in the future.
- **Technological considerations** - As transportation technologies advance, so do other technologies including payment systems, customer service, safety technologies, cellular and wifi service, and so on. Consider how to technologically equip stations for other future needs.
- **Designing for uncertain climate future** - Structures, especially underground ones, should be designed and constructed to withstand the effects of rising sea level and more extreme temperatures and hydrologic events. Resilience in both the operational details of the system and the human user interaction of accessing these transit elements should be a guiding principle of design.
- **Designing for an accessible future, rather than designing to meet the minimum requirements under the ADA.** Adding accessibility to existing infrastructure is far more costly than including accessible features in the initial design (see NYC subway). As our region, and our society at large, age and move towards recognizing that disabled people have a right to accessible transportation infrastructure, we should be designing a system that gives us full and equitable access.

Displacement

While Sound Transit and the EIS process seem well equipped to understand the potential direct displacements from construction and eminent domain, we still have concerns about a) the disproportionate impact of these displacements on certain demographics, and b) the possible impacts of longer term economic and cultural displacement due to rising land values and gentrification.

- **Understand and disclose impacts to hard-to-reach populations** - Sound Transit currently evaluates acquisition and displacement burden on low-income and “minority” populations. While Sound Transit technically has a robust relocation program, we remain concerned that this information may not equally reach those who do not speak English, renters (both commercial and residential), and those who are undocumented. It may be harder to tap into communities where English is not the first language without interpreters and community liaisons. Anecdotal evidence suggests that landlords may not pass on relocation information to tenants due to worries that they will not fulfill their remaining lease. Most undocumented persons will not be able to access relocation benefits, due to federal restrictions.
- **Equitable access to relocation benefits** - We urge Sound Transit to thoroughly analyze potential displacement impacts disaggregated by renter/owner, income, race, English proficiency, and a rough understanding of where immigration status may be an issue (without revealing anything that could be used against communities) in order to understand disproportionate and/or different impacts across alignments as well as ensure the agency has a robust plan to ensure equal access to benefits. Sound Transit should continue to explore innovative mitigation strategies related to relocation for undocumented residents.
- **Cultural and Economic Displacement** - Though much harder to measure, many planners are using models to predict the risk of longer term economic displacement in an area due to critically important but landscape-altering transportation investments. Sound Transit should use tools such as these (PSRC now has a displacement risk tool) to identify areas with high displacement risk and work directly with the community to understand the anticipated impacts from different

alignments, and the appropriate mitigation to help people stay in their homes and jobs and maintain their cultural cornerstones and POC-owned businesses.

Environmental Justice

Currently, Sound Transit's level 3 screening criteria considers impacts to historically underserved populations with a focus on access to opportunity (activity nodes) and burden of property acquisitions and displacements. We believe this analysis must go deeper:

- **Analyze all discipline areas using meaningfully disaggregated data by race and income -** Though some analysis has been conducted by Sound Transit, for each of the different EIS impact discipline areas, we should be disaggregating data by race and income to uncover potential disproportionate burden. For example, fish and wildlife habitat impacts may disproportionately impact cultures and communities that rely on fishing in the area.
- **Consider cumulative impacts on historically marginalized populations -** The public should understand disparate impacts across all disciplines -- especially considering cumulative impacts on these groups from ongoing systemic discrimination, especially and including impacts from racist policies in the built environment, ongoing challenges of displacement from a fast growing city and region, and historical lack of outreach and representation in government decision-making.
- **Evaluate proposed mitigation using a racial equity toolkit -** Given historic and cumulative impacts, mitigation should look not just to do "no disproportionate harm" nor to "expand mobility for the region's residents, which include transit dependent, low-income, and 'minority' populations," but work to target and prioritize mitigation for these groups and ensure that mitigation is tailored, based on authentic engagement, to be valuable to the impacted communities. Sound Transit should use tools such as a racial equity toolkit to evaluate proposed mitigation.
- **Improve demographic language -** We must also ensure that while the language we use is sufficient to meet EIS requirements that it also respects all the communities we serve. We ask that the agency move away from the term "minority," which is not only disfavored by communities of color, but can often be technically untrue, especially in diverse areas like the Puget Sound. In an age when citizenship is used to threaten individuals and separate families, we also ask that you remove the term "citizens" from your Purpose and Need and analysis, unless the term is explicitly being used in order to understand the impacts, especially of displacement and relocations, on undocumented residents.

Thank you for the opportunity to comment on the scoping of the EIS. We look forward to continued engagement around this project.

Sincerely,



Kelsey Mesher