TO: Sound Transit Staff

FROM: Transit Access Stakeholders: Transportation Choices Coalition, Futurewise, Feet First, Cascade Bicycle Club, Housing Development Consortium, Transit Riders Union, Sierra Club Washington, Rooted in Rights

Dear West Seattle and Ballard Link Extension EIS Staff,

Thank you for the opportunity to comment on the scoping of the West-Seattle & Ballard Link Extension Environmental Impact Statement. The Transit Access Stakeholders group is a growing coalition of organizations that strongly supports connecting the Puget Sound region through affordable, reliable, accessible, and sustainable transit. Together, we represent land use, active transportation, affordable housing, transit, and climate protection stakeholders, with thousands of members in the central Puget Sound region.

Early on in the planning process, several groups submitted a letter that reflected our collective values for Sound Transit 3. These values include:

- 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

As our coalition has grown, we would like to add:

- Accessibility for all users, especially those with disabilities

ALTERNATIVES FOR STUDY

Given these values, consideration of our Level II comments, as well as additional data and information made available through the Level III analysis, we offer the following select route and station preferences for study in the EIS, plus comments regarding specific impacts related to each preference.

Segment	Preferred for study
West Seattle Stations and guideway	**West Seattle Elevated and West Seattle Tunnel Level III options -- Preferred for study** **Delridge station at 25th Ave. SW -- Preferred for study** **Alaska Junction Station at 41st or 42nd -- Preferred for study** Any North-South alignment is preferred to the representative project's East-West alignment. Impacts to potential bus/light rail integration must be studied at each station location.

	For any Delridge station options studied -- study impacts to bus transfer environment and displacement (see further comments regarding displacement below).
SODO and CID	**5th and 4th cut-and-cover -- Preferred for study** **4th Ave. mined station -- Preferred for study** Progressing to Level III we have learned there are a lot of questions about all alternatives. As design progresses, we will more clearly understand these alternatives. Given all the unknowns, we recommend studying both the 4th and 5th shallow station options due to their potential for creating an easy and intuitive transfer environment, in line with the Jackson Hub vision. Transfer times as well as safety and ease of access between the CID station and Sounder, Amtrak and Metro must be studied in detail, beyond current estimates. A mezzanine connection between the stations, including cost and construction impacts, and potential benefits to safe and fast transfers, should be studied. Transit Access Stakeholders also support the CID/PSQ communities in their request for further study of a mined station along 4th Ave. To better understand costs and benefits, and to do right by this historically underserved community, it is necessary to more fully develop design and present additional data and information for decision making. To that end we also support the idea of conducting a Health Impact Assessment (HIA) to fully understand potential disparate health impacts related to the construction and long-term impacts of this station. Any alignment selected for SODO and CID/PSQ must study impacts to King County Metro's operations, current bus bases and base expansion plans, including construction and cumulative impacts to riders, service, and operations. Flexibility of operations for Sound Transit light rail via interconnections of new and existing lines should be included as well. Impacts to the SODO trail, including construction impacts and impacts to future connectivity and planned bicycle routes as outlined in Seattle's Bicycle Master Plan must be studied. Impacts to residents and businesses in the CID/PSQ, including construction and cumulative impacts like economic and cultural displacement must be studied. Selection of a deep-bore station for study must include a study of impacts to transfers, accessibility and integration along the remainder of the downtown route.
Downtown tunnel	**5th Ave./Harrison Alignment -- Preferred for study** A 6th Ave. route throughout downtown presents access challenges, and is less optimal for integration with existing transportation systems, particularly integration with the existing Westlake hub. If 6th/Mercer is studied, please study access impacts to people with disabilities as well as pedestrian/bicycle/transit integration and access issues related to the Mercer St. station placement. The 5th Ave/Harrison alignment provides the best placement for Seattle Center access and is well positioned for future transit-oriented development in South Lake Union area. We are concerned at the lack of prior discussion related to Seattle Streetcar operations. All downtown alignments must study, disclose and mitigate for potential disruptions to existing and planned streetcar operations and capital improvements. This is especially important as a fixed route line cannot be rerouted or detoured during construction.
Smith Cove-Interbay	**Interbay Station at 17th Ave. W -- Preferred for study** Study must consider impacts to regional multi-use trails. For Smith Cove stations studied, consider the ridership market to be served and potential for future destinations within a reasonable walkshed; avoid impacts to other key infrastructure.
Salmon Bay crossing	**Tunnel crossing -- Preferred for study**

	If a fixed bridge is included in the EIS, construction impacts and displacement to community must be studied. The representative alignment, a moveable bridge, requires close coordination with the Coast Guard to identify a mid-level height that balances cost, grade, and frequency of interruption to minimize the quantity and duration of span openings. The effect on reliability of the entire line needs to be carefully analyzed if this option is advanced for further study.
Ballard terminus station	**Tunnel stations at 14th and at 15th -- Preferred for study** For both tunnel station locations, we urge study of access points both North and South of market street. When studying construction impacts of cut-and-cover stations, please consider disruption and mitigation to existing transit, biking and walking connectivity. Potential mitigation could include completing the Missing Link of the Burke-Gilman Trail.

SCOPE OF THE EIS

In addition to comments on routes and station preferences, we also want to offer additional comments regarding the depth and detail of several disciplines to be studied in the EIS. In particular, we would like to daylight impacts that may have been overlooked, may be challenging to quantify, and may disproportionately impact environmental justice populations, and yet are even more critical to consider.

Station Access, Mobility and Integration

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** - Intiutively 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.
- **Transit transfers -** Fast and convenient transfers from light rail to light rail, 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. For downtown stations investing in bike hubs, rather than bike parking at all stations: Pioneer Square and a location in north downtown, such as Westlake, would be ideal.

- **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. Currently, Level 3 screening addresses modal integration, but without an explicit lens of health and safety. For example, construction in Sodo will impact the Sodo bike trail, one of few separated bikeways in the area.

Existing and Planned Transportation Networks

The networks that surround and connect into the WSBLE corridor will leverage this project's investments and expand its reach and ridership potential. It is necessary to ensure that connections, both between light rail lines as well as between local transit and non-motorized networks, not only are seamless, but also provide a robust travel shed for people for whom light rail is only one component of their trip. In addition, it is imperative that access and use of existing and future transportation networks are maintained throughout the construction period. Level 3 screening criteria includes some consideration of bus/rail integration and impacts to current and planned transportation facilities and services, but we would like to understand the following:

- **Consult local and regional transportation plans,** including King County Metro Connects, Seattle's Transportation Master Plan, Bicycle Master Plan, Pedestrian Master Plan, Freight Master Plan and State transportation plans and projects.
- **Local transit impacts.** It is imperative to study the short- and long-term impacts to local bus, train and streetcar service and infrastructure. The study should cover the ability of local transit to adequately serve regional connections to light rail as well as important complementary local routes during construction and in the long-term. In addition:
    - Identify impacts to existing transit service, and to service and capital projects planned throughout the construction period, including bus, Amtrak, Sounder, and Seattle Streetcar service.
    - Replace lost base capacity and access to base in comparable location. Study any potential impacts to King County Metro existing base capacity, and preventing future base expansions.
    - Using existing adopted transit plans of both the City and the County to understand planned capital and service transit improvements and routes.
    - Replace lost layover space in comparable location.
    - Replace dedicated transit pathways where dedicated pathways were lost in parallel/comparable location.
    - Stage construction for minimal transit operations impact.
    - Provide transit operating cost reimbursement when operations are significantly impacted.
    - Minimize construction impacts to accessing bus stops.
    - For all of the above, work closely with transit partners to identify best solutions.
- **Bicycle network impacts** The short and long-term implications and opportunities to leverage the bicycle network must be studied, including how specific station locations and adjacent facilities could create direct access via a connected all ages bike network. Furthermore, ST should study impacts to any existing bike facility, either during construction or over the lifetime of facility operations, and suggest appropriate mitigation. Specifically:
    - Identify impacts to the existing bike network, including major trail connections, due to construction or long-term operations. For example, the SODO Trail; Ship Canal Trail; Elliot Bay Trail; West Seattle Bridge Trail; Alki Trail and Duwamish River Trail. Identify appropriate mitigation, such as an alternate all ages and abilities route, for the duration of the time any route would be impacted.
    - Use the existing Bicycle Master Plan (BMP) to understand planned bicycle facility planning and routes, but also consider the following:
        - Several projects along routes listed in the BMP have advanced to final design/construction without inclusion of the bike facility recommended in the BMP.
        - Routes in the BMP were designed before ST3 was envisioned. Thus the route currently listed may not be the most appropriate in terms of location or facility type, or both, given this new context.

        - Identify opportunities to leverage ST3 construction to complete and/or connect to identified routes in the BMP, either as construction mitigation or in order to provide access to the stations.
    - Study what types of bike infrastructure, and what level of wayfinding for people biking, best facilitates biking to the station. For example, neighborhood greenways in Seattle vary greatly in their design, and thus the comfort and convenience, as well as their perceived and actual safety vary. Furthermore, their location on neighborhood streets does not create the level of visibility that would enable users of other transportation modes to know that biking to the light rail station is an option.
    - As above, end of trip facilities are essential in making functional the bike routes that connect people to stations. Study how stations will not only serve people travelling on light rail, but also as community hubs, to ensure that capacity accurately reflects demand of the station area. Ensure that bike parking is placed conveniently, and with high enough initial capacity – plus space for capacity increases as the light rail system expands. Study the need for multiple types of bike parking, from regular racks to secure storage. Finally, ensure that during construction and the lifetime of operations, the existing capacity of bike parking is not reduced.

- **Pedestrian network impacts** The EIS must examine the short- and long-term impacts and opportunities for pedestrians. Specifically:
    - Light rail stations have the potential to promote the development of walkable urban centers in the surrounding areas. Evaluate and compare the potential of the various station site options for promoting pedestrian-oriented development.
    - The existence of a complete pedestrian network surrounding a light rail station is vital to attracting system users on foot. Are there any existing gaps or barriers in the station-area pedestrian network that need fixing? This includes improved pedestrian networks that should include lighting, increased accessibility across the station walkshed, and other enhancements to improve the pedestrian experience.
    - Elevated track and stations can potentially degrade the street-level pedestrian environment and casting shadows on people walking at street level. How are walking conditions impacted by the possible construction of elevated structures in West Seattle, Ballard, and elsewhere?
    - Construction of stations and other light rail system elements can last for many years, in the process blocking sidewalks and closing roadway crossings. Study all construction-related impacts to sidewalks, crossings and curb ramps, and mitigate appropriately for all ages and abilities, with extra consideration for accessibility needs.
- **Coordination with other major transportation projects**
    - Specifically include City of Seattle work on the Seattle Streetcar, Center City Bike Network, Ballard Bridge, overpasses in the Sodo neighborhood, and updates to freight circulation patterns in and around the Port of Seattle.

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 West Seattle and Ballard lines. 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 -** In both West Seattle and Ballard, 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. For example, will future rapid bus lines service the Ballard terminus station, and how can the Ballard station be future-proofed to accommodate increased bus transfers?

- **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 city, 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 the 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,

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