

Date: May 26, 2020

To: Sound Transit Board and Leadership

From: [Rooted in Rights](#), [Transportation Choices Coalition](#), [Puget Sound Sage](#), [Cascade Bicycle Club](#), [OneAmerica](#), [Everett Bike Walk](#), [Center for Independence](#), [Greater Redmond Transportation Management Association](#), [East African Community Services](#), [Seattle Neighborhood Greenways](#), [350 Seattle](#), [Feet First](#), [Transit Riders Union](#), [Sierra Club](#), [Downtown On the Go](#), [Seattle King County Coalition on Homelessness](#), [Front and Centered](#)

Re: Program Realignment

Dear Sound Transit Board and Leadership,

Thank you for the opportunity to weigh in on the program realignment objectives and process. We are devastated by the huge projected losses due to COVID-19, and are dedicated to helping Sound Transit deliver on a robust and equitable transit system.

The following joint vision and guiding principles unify our growing multi-sector coalition and have been our collective focus since the long-range planning process for Sound Transit 3. During the formulation of the ST3 package we returned to these guiding principles to focus our feedback, and we have used them subsequently to evaluate line alignments, the system access fund criteria, and more. And now, as Sound Transit (ST) faces the unprecedented financial challenges brought about by the COVID-19 crisis to deliver on ST3 commitments, we have returned to these core principles to guide decisions on achieving the best outcomes we can with the resources we have.

There is substantive alignment between our principles and ST's adopted priorities. The ST board has adopted "socio-economic equity", "multi-modal access", "transit-supportive land use and TOD", and "transit integration" as core priorities, Sound Transit has adopted an internal [Equity & Inclusion policy](#) and an [equitable transit-oriented development \(TOD\) policy](#). Furthermore, the criteria for evaluating projects for system access funds include: equity, connectivity, and safety & human health. We are pleased to see such alignment and hope the board carefully applies these criteria to the program realignment process.

We also know that Sound Transit's Office of EEO, Equity & Inclusion is developing and piloting equitable engagement tools and racial equity toolkits. We recognize that the agency is in the early process of program realignment, but hope they can make good use of these tools in order to keep their commitment to engaging the community on big changes that impact them.

No one wants to see voter-approved projects cut. We strongly support delaying rather than canceling where possible, and applying the criteria and questions below as you decide what must be delayed or changed in scope, and in what ways.

Improve Community Engagement

- Adopt best practices for expanding engagement with low-income and working communities, people of color, immigrants and refugees, and people with disabilities earlier in and throughout the planning process.

What does this principle mean for program realignment?

- Community engagement for program realignment must extend beyond working with elected officials and jurisdictions to include people the system is intended to serve.
 - Draw from the realignment experience from a few years back (Highline to Federal Way), and focus on adequate paid contracts for community partners to directly engage community members about their needs, priorities, and aspirations.
 - Those community members that participated in the enforcement listening sessions would be a good place to start, as well as those still riding transit, and focusing on census tracts with large numbers of essential workers, transit-dependent folks, and BIPOC and low income populations.
- Use program realignment as an opportunity to test the new equitable community engagement tool developed internally for use at Sound Transit.
 - This will help identify those most impacted, the specific impacts, as well as a process for understanding their concerns and being accountable to them.

Use a Race and Social Justice Lens in Decision Making

- Prioritize investments and service to low-income households and communities of color, both of which are disproportionately transit-dependent, underserved, and often negatively impacted by transit investments.
- Use Racial Equity Toolkits, the adopted Equity Policy, and data disaggregated by race and income to make decisions

What does this principle mean for program realignment?

- Our definition of “highly impacted” has changed in the past few months as we have seen not only who relies on transit, but how critical these trips are to people and the work they do: essential workers and those taking essential trips, mostly low-income and people of color, deserve to be centered in the program realignment process.
- Decision-making should include consideration of essential and other low-income workers displaced to long commutes that may start beyond Sound Transit’s borders. The ability for these workers to connect to Sound Transit may mean the difference between affordable and unaffordable commutes, and also may help avoid large increases in air and climate pollution. That said, creating connections by investing in parking often won’t result in desired outcomes. (see [“Parking”](#) section below)

- *Who* do these projects serve -- not just “how many” -- is now one of the most important questions to guide us.
- We urge you to ask and support staff in using the ST adopted [Equity & Inclusion Policy](#) and the newly developed Racial Equity Tools to do analysis and review the realignment process.
- Do not cut programs like the income-based fare pilot and do not scale back investments needed for critical enforcement reforms.
- Formalize commitment to building out Graham Street Station by creating a project work plan and investing resources in project planning.

Prioritize Multimodal Access, Mobility, and Integration

- Increase investments for local transit, walking, rolling, and biking access to high capacity transit, as it is affordable, effective, and sustainable, and a majority of riders access the system this way.
- Prioritize funding for local transit, walking, and biking access to high capacity transit over parking
- Design for an accessible future, rather than designing to meet the minimum requirements under the ADA
- This includes: Intuitively and seamlessly finding and getting into the station, integration with other modes, safe and complete surrounding networks, and easy access regardless of age, language, ethnicity, gender, race, ability

What does this principle mean for program realignment?

- System access is a core component of ensuring the region’s investment in light rail serves riders, especially those who depend on transit. The vast majority of users currently access the system via local transit, biking, rolling, or walking, underscoring investing in seamless integration of these elements *as we build the system* is essential. Access is core; not a “nice to have”.
 - Maintain the remainder of the system access fund, which provides funding towards local access projects to both existing and forthcoming projects.
 - Maintain system access allowances for each ST3 project.
 - Redundant conveyances (such as multiple escalators and elevators or regular access to stairs) are neither redundant nor just “nice to have”. We are paying for cost saving measures in this area now, when frequent outages leave entire stations inaccessible to swaths of the population, and causes others to switch to cars in order to reliably get to work on time.
- Ensure that program realignment engagement also includes direct feedback from partner transit agencies to ensure transit integration between the regional and local systems is not threatened by any changes.

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

- Parking is expensive, creates safety and air quality issues, reduces opportunities for affordable housing and good TOD, and 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.
- Plan for and build less parking for each project
- For those for whom driving to a station is their only option, focus on ADA and ORCA LIFT parking.
- Price and manage parking at all current and future park-and-ride lots.

What does this principle mean for program realignment?

- We recognize that while building parking is expensive and has real environmental consequences, many users have been displaced to areas that are not well served by local transit and must rely on driving to transit. Therefore we must take a nuanced approach as we look for cuts to the system.
- Look for opportunities to cut parking first in areas that are well-served by transit.
- Where access by car is critical, ensure parking is properly managed (including income-based pricing and residential parking permits) to serve those that need it most and prevent neighborhood impacts.
- Look first to more flexible or less expensive parking arrangements, such as shared parking, leased parking, joint parking development, and parking that could be converted to TOD as local transit systems are built out. Work with local jurisdictions to manage parking as service continues to change.
- To save money while not removing investments in certain communities, redirect parking dollars into less expensive access improvements at those stations.

Maximize Ridership with Potential for Equitable TOD and Density

- Adopt robust policies, projects, investments, and alignments that maximize potential for equitable transit-oriented development (TOD) and increased density.
- Build in sufficient funds for multimodal access and equitable TOD development to each station.
- Considering access costs when evaluating alignments. Parking lots and freeway changes are more expensive than completing sidewalk networks.

Prioritize Affordable Housing in Development Decisions

- Sound Transit should prioritize affordable housing and other equitable development in the use and disposal of its land.
- 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.
- Engage community members early in TOD and land use planning process.

Minimize and Fight Displacement

- Understand and disclose impacts to hard-to-reach populations, especially people of color, renters, small businesses, those with low English proficiency, and undocumented residents that are at high risk of displacement.

What do these principles mean for program realignment?

- Being able to live or work near transit in compact walkable communities or TOD is a core component of accessing light rail, especially for those who depend on transit. The vast majority of users currently access the system via local transit, biking, or walking, underscoring the need to invest in seamless integration of these elements as we build the system is essential. Access and TOD are core; not just “nice to have”.
- Do not eliminate TOD planning dollars.
- Do not eliminate policies that allow ST to sell land for no cost, or de-prioritize low-zero cost sales/transfers to recoup revenue.
- When planning, don't cut costs in acquisition either. For example, don't just buy slivers of property such as those in the Rainier Valley, instead think of long term equitable TOD outcomes.
- Prioritize alignments that minimize displacement of Black, Indigenous, people of color, and low-income stakeholders.
- Consider strategic land acquisition for project staging that could maximize equitable development outcomes and preserve units and buildings at risk of displacement.
- Use models that predict the risk of longer term economic displacement due to large transportation investments to identify areas with high displacement risk and work directly with the community to understand the anticipated impacts from different investments, and the appropriate mitigation to help people stay in their homes and jobs and maintain their cultural cornerstones and POC-owned businesses.

Maximize Reliability

- Sound Transit should choose projects and alignments with exclusive right-of-way and grade separated from other modes where possible.

- Don't take alignment shortcuts on cost that will impact the safety or reliability of the system going forward.
- At-grade crossings for rail risk injury and reduce reliability. New at-grade crossings should be avoided.
- Route planning should be made through a racial and social justice lens. Planning should avoid splitting communities already harmed by gentrification, displacement, and heavily-trafficked roads.

Plan for the Future

- Design alignments and stations that make it easy to expand lines and create new junctions;
- Design for resilience and an uncertain climate future
- Consider future land use and the communities we want and need in the future. Select alignments that will serve the needs of the community as well as provide greater access to opportunity to more communities.

What does this principle mean for program realignment?

- 130th - we are supportive of reducing any future service disruptions, and increasing any opportunities to build transit-oriented housing options early by incorporating the construction of 130th as we build out Lynnwood Link. We do want to make absolutely sure that accelerating this station work, including the authorization of spending ST3 dollars earlier than anticipated, will not impact the delivery [beyond current COVID and recession impacts] of Link to Everett and “completing the spine.” We know that taxpayers in Snohomish County are eagerly awaiting their connection to the system, and that relief on our regional transportation system is highly dependent on getting the extension to Everett completed.