To: Mayor Harrell, Seattle City Councilmembers, and SDOT leadership
From: Transportation Choices Coalition and Cascade Bicycle Club
Re: Joint Comments on Seattle Transportation Plan
Date: October 30, 2023

Dear Mayor Harrell, Seattle City Councilmembers, and SDOT leadership,

Thank you for the opportunity to comment on the draft Seattle Transportation Plan. Cascade Bicycle Club and Transportation Choices Coalition are both transportation advocates focused on safe, sustainable, and equitable transportation options. Our organizations reviewed high-level sections of the plan, and then each reviewed the Bicycle and Transit sections, respectively. Below are shared general comments, followed by more specific modal feedback.

The goals in the STP laid out align with Transportation Choices' and Cascade Bicycle Club's work and values. In particular, we urge the city to focus first and foremost on sustainability, equity, and safety. We encourage the city to affirm a commitment to walking, rolling, biking, and transit being the most convenient way to get where you need to go, rather than just making it possible to walk, roll, or bike.

We are grateful to the work of the Transportation Equity team members and the Transportation Equity Workgroup for their development of the Transportation Equity Framework (TEF) and ensuring that it is reflected in the STP, both in content and in process. We urge you to continue this commitment to equity as the process continues, especially as you prioritize the many important needs and actions in the plan.

Questions and opportunities for improvement in STP
- **Have clear targets**
    - Many stakeholders agree that safety, sustainability, and equity are essential goal areas. However, it will be easier to prioritize projects and measure progress if we have clear metrics. Each goal should have an associated target, such as for VMT, mode shift, accessibility, GHG reduction, and Vision Zero. You should also work with TEW to identify equity/demographic metrics, such as which neighborhoods receive what percentage of the benefits.
- **Strengthen words and commitments**
    - There are several places in the document where it suggests a more passive role for the city where it should instead take action. For example, using "promoting" sustainable options rather than something like "providing"; "normalizing" community input instead of something like "operationalize/requiring." If the intent is only to educate or market, the city should clarify why.

- **Stronger commitment to reducing harms from enforcement**
  - TEF lists multiple Transportation Justice strategies related to concerns about the impacts of enforcement and the importance of mitigating the harms of automated enforcement. The document lists automated enforcement as a solution but should have more specifics on enforcement, a full explanation of concerns, and plans to mitigate harms and implement equitably.
  - The document should include language asserting that we should prioritize structural/infrastructure changes, that we want to move away from enforcement and punishment as a safety strategy, and that we shouldn't rely on enforcement as a funding mechanism.
- **Be much more specific and clear**
  - An overwhelming observation is that many of the actions listed are generic, and how the city intends to implement/operationalize or prioritize needs to be clarified. We will provide a specific list with examples below.
  - Sometimes, there are terms used that aren't easily distinguishable (e.g., community hub, mobility hub, public spaces, welcoming public places, welcoming public realm, neighborhood vitality. There is a mix of upper- and lower-case community and mobility hubs - are some generic and some defined?). Having discrete actions for these only makes sense if we clearly understand what the plan means by them.
  - It is unclear what the maintenance key move means: "Transform city streets for safety and sustainable travel choices through optimal timing of asset maintenance and replacement." - What's the method of M&R that leads it to be safe/sustainable?
  - Many of the blue headings are generic and overlap.
- **On equity**
  - Lift up ADA/accessibility - ADA/accessibility isn't mentioned in the Equity at-a-glance section.
  - Linguistic equity/legibility is not listed in the at-a-glance section.
  - Is focusing on mobility hubs in conflict with larger safety goals - focusing on a few areas rather than targeting high-injury corridors?
- **Treat freight carefully in transit/multimodal sections**
  - Having "businesses" treated the same as "people" in the Vision is concerning. ("All people and businesses can access their daily needs and feel connected to their community.") Businesses don't have needs or communities the same way that people do. If we write it centered around people, perhaps we can address what people need that businesses provide, whether they are running businesses or shopping at them - the chance to make a good living, a thriving economy, the goods that help them eat, get healthcare, etc. It's also a little odd to name businesses but not other organizations - nonprofits, governments, healthcare.
  - Ensuring consistent travel times on the freight corridor may not always align with prioritizing safety goals.
  - "Supporting" growth in deliveries may not align with VMT reduction goals; should we not be mitigating instead?

- ○ There are a lot of places where freight is listed along with multimodal options and under the transit section. That feels worrisome, as freight is not people moving – it is goods. It needs to be considered, but should be considered differently.
  - ○ "Personal, commercial, and delivery trips" → does that include transit? Government fleet? Why isn't delivery a part of commercial?
- **On safety**
  - ○ This section feels well-intentioned but worrisome: "Responsibility is shared: All people are vital to preventing fatalities and serious injuries on city streets, including governments at all levels, industry, non-profit/advocacy, researchers, and the traveling public (except children). Those designing the system hold greater responsibility."
    - ■ Responsibility is shared but not distributed equally. People driving large, dangerous machines should have more responsibility. People who hold power and money have more responsibility. People who have been oppressed, marginalized, and disenfranchised have less personal responsibility to make things right for their communities.
  - ○ It would be good also to name interpersonal safety in this document - how do concerns about harassment, police violence, and other matters play out in public space, and what is the role of transportation infrastructure and programming in addressing them?
    - ■ In fact, given the interest in "public safety", it would behoove the STP to show what a strong connection transportation has to public safety. Sustainable transportation in fact leads to better public safety. Frequent transit leads to shorter wait times; more people biking and walking leads to more eyes on the street.
    - ■ It would be helpful to list possible interventions such as partnerships with social service agencies, security presence that isn't law enforcement or people with weapons, a presence that is more like service/transit/other ambassadors, as well as activation as a strategy (like the "transit navigators" that the CBOs mention in this document - why aren't they included?)
    - ■ Buses should run late at night - this was a recommendation from CBOs- don't see it called out in actions.
- **Modal network integration policies cannot undermine or supersede complete streets policy or intended outcome.**
  A core intent of the STP plan, and rationale for combining modal plans, was to resolve modal conflicts (plans to add infrastructure for multiple modes on streets where the right of way is too narrow to support all modes) created by separate modal plans. In this draft, we don't see how conflicts are being transparently resolved, either in an articulated policy, or by how the plan is laid out (one chapter per mode).
  - ○ A clear modal integration policy must make the safety of everyone who walks, bikes, rolls, and accesses transit the top priority, as a necessary step to achieving mode share goals.

- ○ How does the draft One Seattle Comprehensive Plan's Complete Corridors policy reconcile with the city's Complete Streets Ordinance? The two policies appear at odds with each other. The Complete Corridors Policy must commit to building all facilities planned for and needed for the safety of all users (even if some are on a parallel route) as part of a given corridor project – not as a possible future project – as implied by the current language in the Complete Corridors policy.
  - ○ The final plan must include the Modal Integration Policy.
- **Move quickly on progressive funding sources**
  - ○ New funding sources can be a time-consuming, big political lift. We urge you to socialize and advocate for these ideas as soon as possible, so we have better options for the next funding package.
  - ○ Equitable congestion pricing is something the city has explored but does not seem to be listed as a funding option.
  - ○ If there is state authorization needed, work with your partners soon to help move these options forward.
- **Other questions/concerns**
  - ○ How does this plan change if they don't renew STM and there's less of a connection to frequency/service in this plan?
  - ○ In some places, the document is explicit in the city's role - what the city will or won't do, but is inconsistent.
  - ○ "Building capital projects to make transit faster and more reliable" is laid out in the intro; it would be good to get more specific since this is the city's main role with respect to transit.
  - ○ It would be helpful to explicitly state that there is a role not just for project implementation and process improvements, but about city policies that should be adopted to codify and strengthen this work. Similarly, the city should be explicit about its role in pursuing changes at the state to support this work. For example, permitting changes, authorization for road pricing, or other progressive funding sources.
  - ○ It would be good to have specific tactics about relevant topics: interpersonal safety, workforce, funding, youth riders, partnerships with social services, etc.
  - ○ How much were local transit agencies consulted for this section?
- **Consider organizing the document better for clarity**
  - ○ It is often confusing that there are duplicate actions across sections - yes, there are obvious connections to transit, but what's the specific tie? Some appear in all, and others are specific "to one or more"?
  - ○ The roles of the asterisks are unclear - are they "specific" or a "priority"?
  - ○ For some of our staff, the document content was not searchable - Only the section titles are text, and the rest are not searchable in the PDF.

As the city moves forward with refining the STP vision document, STP project list, and potential funding package, we recommend the following next steps:

- **Get specific and prioritize key moves.** Per the above comments, many key moves need additional information. Stakeholders also need help understanding - which have the biggest impact on our goals? Therefore, which should be prioritized?
- **Give context to the project list.** Ensure stakeholders can best understand large capital project lists. How much do these projects cost? What is the best timeline for delivering them? How much do they help move the needle towards different goals?
- Identify targets/outcomes. Ensure STP plans include specific 20-year targets for goal areas. Include ambitious 10-year targets as well that could be achieved by a 10-year funding package.
- **Develop scenarios to meet**. Help stakeholders and the public review package options by providing scenarios that combine different maintenance, program, and project investments to best meet different stated goals. What would we need to do first to prioritize reducing pedestrian deaths? To best reduce VMT? To make the biggest impact on transportation disparities? Be transparent with the public on what things are must-haves at the City (are there grant commitments, legal obligations, etc that will need to be part of a package no matter what?).
- **Define accountability**. Once we know what our targets are, how will we know we are achieving them?

Sincerely,

Transportation Choices Coalition
Cascade Bicycle Club

Appendix 1 - Transit-specific comments

Page number		
T-2	Relationship to STP	Last sentence of the Safety section is confusing. Should be a little clearer around safety around stations - should go beyond naming just "hubs" - all stations should be safe, well-lit, etc.
	Safety Key Moves - general	• It would be good to name interpersonal safety • Would be good to name infrastructure changes and explicitly say, we do not want to rely on enforcement. • What about narrowing lanes and street widths near transit stops and on corridors • Maybe name activation? • What about partnerships with social services • What about security staff that are really just city ambassadors (like the "transit navigators" that the CBOs mention in this doc) • Buses should run late at night - this was a recommendation from CBOs- don't see it called out in actions
T-4	Safety Key Moves	T2: What are new and emerging safety treatments? Give some examples? T3: How is this a safety key move? Also how do you classify or ensure this is "equity" if it's about new development and relying on private development T4: Yes - but this is so huge - how do you prioritize it? How do you define upgrade? Does this also include adding missing?
T-5	Safety Key Moves	T5: Clarify terms for general public - what is a road diet? T9: This is too generic - what is the action? Seems like this should be a heading for a section, then there should be specifics listed. Maybe a good place to add interpersonal safety and security? T10: This is too generic - what are the specifics of station access plan? examples? Tactics? T13: How to feature community voices? What does this mean?
T-6	Equity	T17: Instead of normalize - how about operationalize/require T18: How does it relate to maintenance and modernization? T20: What process to prioritize? How does it relate to maintenance and modernization? T23: What kind of support SDOT is considering? T25-27: Specifics needed. T27: Should add "and the project level"
T-7	Equity and Sustainability	T28: 24/7 transit networks - are transit agencies onboard? T32: What are the equity considerations of this? T33: What are co-investments? Of what kind? Too vague T35: Is "moving goods" inherently a sustainable travel option - doesn't feel like it should be there, or if it is it should be explained T36: How can we consider equity in this?

		Sustainability section generally: - So many of these blue headings are generic and overlap - for "easy and enjoyable" surely there are more things than lighting? Should also be at stations. Activation. Cleanliness. Networks. Wayfinding. How are we defining "easy"?
T-8	Sustainability & Mobility	T39: Will it not improve livability? T44: Like what? Is the revenue generation a main component of this? Also I don't think "freight movement" should be under walking, biking, and transit T45: Lofty goal - how to achieve it? T47: Yes - in what way (in your role as city)? T48: How to consider equity for this? T49: Like what?
T-9	Mobility	T52: Is it a good place to talk about interpersonal safety? T54: What does this look like if you aren't controlling service or doing renew STM? T57: Prioritize, compared to what? Seems also like you should separate service increases from capital improvements T58: What is the policy? T59: Too many ideas in one thing. Prioritize access to underserved is one thing, and then expanding metro flex is another. T60: What are they? Who wants them? Where do they go? Is that better than just improving things everywhere?
T-10	mobility	T61: Connections to….from where? T62: Seems weird to call out who will implement them (or pay for them). You'll do lighting, but not at a stop? Seems like if you don't call this out for service, you don't need to here, because you could easily use STM or other capital money to help build shelters or stops T63: since this is just for transit, seems like you should only mention Transit and freight lanes here (not freight only lanes) T64: Don't we have this?? General: There is a mix of upper case and lower case community and mobility hubs - are some generic and some defined? -is this a smaller set than transit corridors? Transit stations? Stops? Can we get more specific about those? Maybe it's tiered but we have a commitment to do them many places as possible
T-11	Mobility	T71: What's the specific tie to transit? Is there transit on those streets? Do they connect to transit? T72: Be specific, what does this mean? T73: Which transit assets is this talking about? Should complete streets be in here? T75: It is weird to see freight in here
T-12	Mobility	T78: Since this is the transit section, what data are you collecting? And for what purpose? T79: Feels too generic T80: Too generic T81: This should be specific to transit T82: "and equitably"

T-14	opportunities and emerging trends	Equity: internet/data support is one aspect. What are other equity aspects? it does not outline how these new mobility innovations will be integrated into the existing transportation system to ensure equitable access and safety In general, the section discusses the opportunities and emerging trends and makes a case for expanding transit options and improving connections. It doesn't provide specific details on how equity considerations will be integrated into the expansion and restructuring plans.
T-15	Challenges	How are these challenges considered in STM planning and what strategies to mitigate?
T-16	Transit's role in Addressing Climate Emergency	Great content, but lacks specifics in one place on what/how SDOT is integrating their plans with climate strategy
T-17	Community Engagement	Great section, but unclear how the inputs/feedback is incorporated. providing specific examples will be helpful
T-23	Frequent Transit network	Great overview. Need clarity on funding sources, priority corridors, equity considerations, and how the FTN is updated based on changing realities - populations, employment opportunities, links to other modes of transportation, etc
T-45	Transit Spot Improvements	Missing examples of how the previous investments helped to the overall improvement of the transit system or how they align with broader transportation goals.
T-48	Freight and Bus lanes	The passage briefly mentions "negative impacts to transit service" but doesn't elaborate on what these impacts might be or how they can be mitigated when implementing FAB lanes.
T-51	Innovative Transit Streets	Great collection of ideas and case studies
T-52	Rider Experience	May be a place to include personal safety concerns and the impact on transit use? Highlights what are needed for a great transit experience, but lacks specifics on how the measures are implemented
T-53	Alternative Service Models	Limited discussion on the role of public and private providers. The examples highlighted doesn't specifically cover how their success/challenge will inform SDOT in future for new service concepts
T-55	Mobility Subsidies and Services	Lacks information on sources of funding that SDOT considers for this, and how are they generated
T-56	Fleet Electrification	Lacks concrete information about the strategies, policies, or initiatives that SDOT intends to implement to encourage the adoption of low- and zero-emissions transit vehicles

T-57	Transit Asset Maintenance	Limited information on what is SDOT's plan for collecting info on transit assets - doesn't explain how this data is collected, what it reveals, or how it informs maintenance decisions While it mentions the closure of the West Seattle High Bridge and the role of transit during such closures, it doesn't directly connect this example to the discussion on asset maintenance
T-58	Defining Success	Lots of good ideas, but lack specifics. For instance, take Proactive maintenance, after reading it, there are clarifications needed: ● Are there particular facilities or areas that will receive priority in proactive maintenance? ● How will the allocation of resources and budget be determined for proactive maintenance? ● How will you "make sure" the facilities are good? Will there be some assessments for it? ● How will community feedback and input be considered in the design and implementation of these "success measures"
T-59 T-60 T-61	STP Performance Measure Targets	Process of development of metrics? Clarity is needed regarding which specific metrics will be tracked by demographics and geography, and how this data will shape decision-making for equity goals. The passage acknowledges that the ability to track performance measures depends on various factors such as staff capacity, data availability, and resources. It would be helpful to know how these challenges will be addressed, and what plans are in place to ensure data collection and analysis
	Freight corridor and safety	Ensuring consistent travel times on the freight corridor may not align with prioritizing safety goals on the N 85th Street corridor and other places
	24/7 transit lanes and priority streets	Preference to new transit lanes appear to signify a shift away from the recent implementation of 24/7 bus lanes citywide.It appears to be a return to a focus on peak-only buses, even as Metro transitions toward an all-day network

Appendix 2: Bicycle and E-Mobility Specific Comments

We provide comments and recommendations that are specific to the Bicycle and E-Mobility section of the STP, in service of delivering a plan that makes biking a safe, intuitive and appealing option for people of all ages and abilities, in every neighborhood in Seattle.

Commit to the 7% bike mode share goal

Set specific targets for Bicycle and E-Mobility Performance Measures that reflect the potential for bike mode-share that is already delivered by some of our sister cities across the world. Mode-share targets are the foundation of implementing the plan.

- A 7% bicycle mode share goal by 2030, in alignment with the SDOT Climate Change Response Framework goal, balances achievability and ambition. One such example of success: Vancouver BC achieved a 10% bike mode share a handful of years ago and has a lot of relevant geographic similarities to Seattle, by building a connected, protected bike network. A midpoint year target is important to the plan as it provides data on course corrections needed and informs the next update to the plan.
- A 15% bicycle mode share goal by 2044, in alignment with the end year of the STP. This requires an 8% increase in the 14 years after 2030. Cities like London, Paris, and Mexico City are achieving these kinds of increases in similar timeframes by prioritizing complete and safe bike networks and other elements to make biking safe, comfortable and appealing.
- We support the four proposed metrics in the bike section. Please also reinstate the Connectivity target from the 2014 BMP. This should be renamed to better reflect the actual target: Network Completeness target – 100% of the bicycle network completed by 2044.
- The 2014 BMP had the target of 100% of households living within ¼ mile of an AAA facility by 2035, but the STP pushes that date out to 2044. That will not get us to our mode shift goals. Restore the prior goal.
- Add a directness performance measure that tracks making biking a convenient way to get around. This can be measured by directness of routes for driving vs biking and estimated travel time calculations.

Prioritize all Safety Key Moves and Actions in Plan Implementation
The draft plan includes a list of 81 Actions SDOT can take to advance the bike network – a large enough list that not all actions can be implemented simultaneously or immediately. We request that SDOT prioritize all actions that relate to safety. These are the strategies that will make the most important and immediate impacts on reducing deaths and serious injuries on Seattle's streets, encouraging more people to get around by bike, and decreasing transportation-related GHG emissions. Specifically, plan implementation needs to require rapid action in the following areas:
- Re-commit to zero deaths and serious injuries on our streets by 2030, per Vision Zero goal
- Embed safety in every transportation project and program
- Prioritize bicycle safety improvements on Seattle's most dangerous streets and intersections

Rapidly Build out and Expand the Bike Network (per STP EIS Alternative 3)
We appreciate that one implementation action is the "complete the bike network" (Key Moves B15, B38), and we heartily agree that this MUST be an outcome. As noted above, a complete network of protected and comfortable all ages bike facilities is an essential component to ensure the safety of people already biking, and making biking a real option for more people – and thus achieving the bike mode share goal. It's important to note that despite SDOT receiving over 500 individual comments on the bike network during the STP outreach phase, the STP bike network map largely replicates the existing 2014 BMP, with a minor level of adjustments. We appreciate

the affirmation of the BMP corridors, but there are very visible omissions from the map that must be included to achieve a bike network that serves people across the city:

Missing bike routes in the bike+ map
- Add an additional North/South and an East/West connection in SODO: SODO is one of the most dangerous parts of the city to bike or walk, and many more routes (particularly east-west connections) need to be planned to turn around the disturbing trend of fatalities and serious injuries. Two north-south routes (6th Ave S and East Marginal Way) through SODO are insufficient; people need to be able to access their jobs and more *within* SODO too.
- Add AAA bike connections to Graham St. near the future light rail station. Currently it has a non-bike+ facility designation assigned to it. *All* future light rail stations, community mobility hubs, and other transit centers must include protected and safe bike facilities to seamlessly connect to them.
- Change the non-bike+ designation on Seward Park Ave S south of Seward Park to Rainier Ave S to an all-ages-and-abilities bike+ route. This is currently a well-used part of the Lake Washington Loop and represents a major gap in the bike network that would connect the Rainier Beach community to points north. We recognize there are segments of Seward Park Ave with constrained right of way, consider adding protection where possible and a creative solution with a raised or semi raised compact bike lane in narrow segments.
- Change the non-bike+ designation on S Othello St from MLK Way S to Seward Park Ave S to an all-ages-and-abilities bike+ route.
- Add a bike+ route through Interbay.
- Add an access route to the Burke Gilman Trail via NE 94th St connecting E-W to 38th Ave NGW.
- Change the non-bike+ designation on Greenwood Ave N from N73rd St to N 105th St to an all-ages-and-abilities bike+ route.
- Change 48th Ave SW from SW Graham to Beach Drive SW from "Non-Bike+" to "Bike+ Arterial, Proposed".
- Change 35th Ave SW south of SW Roxbury from "Non-Bike+" to "Bike+ Arterial, Proposed".
- Change California Ave SW/ California Way SW from SW Atlantic St to Harbor Ave SW / Alki Trail from "Non-Bike+" to "Bike + Arterial, Proposed".

Direct bike connections to every commercial center in the city.
By 2044, there is no question that people should be able to bike to their neighborhood grocery stores, daycares, clinics, and more, without having to be on a parallel route a few blocks away and figure out how to cut over to the main arterial. SDOT is already doing this with planned protected bike lanes in Beacon Hill and Eastlake; this same type of planning can and should happen in every neighborhood in the city. The bike+ network maps must include safe and protected bikeways directly to businesses, jobs, and services along the following key routes:
- Rainier Ave in Columbia City
- The entirety of 1st Ave S. in SODO

- 85th St. in Greenwood
- 45th St. in Wallingford
- Jackson St. in the Central District
- Broadway/10th Ave. in Capitol Hill
- All other major arterials that become commercial areas as a result of any Comprehensive Plan update zoning changes

Bike Routes in South Seattle
- SDOT must prioritize building out the proposed bike network in South Seattle to address historical investment disparities that have resulted in more projects built in Central and North Seattle.

Implement abundant secure bike parking citywide
- We support the plan's proposal for a permanent, staffed bike parking program within SDOT. We urge the department to codify wherever possible the listed strategies to install secure, sheltered bike parking facilities across the city that accommodate a wide range of bicycle types and sizes. Make it as straightforward as possible for the department, outside contractors, developers, and anyone else the city works with to include bike parking in their plans from the beginning, not as an afterthought.