

Letter FW155

Associated Students of Highline College, Ruth Krizan

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Associated Students of Highline College

MS 8-3
PO Box 98000
Des Moines, WA 98198-9800

ASHC Resolution May 5, 2015

RE: Sound Transit, Light Rail- Highline College Station

On behalf of the 17,000 enrolled students at Highline College, in considering the Sound Transit Board's Light Rail proposal that brings a new transit station to Highline College,

Whereas, more than 50% of our student population receives some form of Financial Aid, we believe that Light Rail provides an affordable and needed resource to our campus. We are important stakeholders in this decision.

Whereas, we see our college as a daily destination for thousands of regular users of our services and the local businesses around us.

Whereas, we are concerned about the safety of our students and the benefits that will come with a new transit center adjacent to campus.

Whereas, we desire maximum transit access to promote the equity and social justice mission of Highline College.

LC9-1 We are resolved in endorsing a new station called, Highline College Station, in the tradition of naming stations by local landmarks and acknowledging the importance of our college as the preeminent destination and landmark in this region. We have been here for 50 years and will likely be here 50 years from now.

We are resolved in supporting a station on Pacific Highway South, not 30th Avenue, due to the foot traffic distance times to campus and safety concerns of student, faculty and staff as they walk from the station to campus. Further, we request the station be on the west side of Highway 99, or a sky bridge be built over the highway, to prevent needless death and injury of students that will occur student cross 99 at grade level.

We are resolved to bring the transit center as close to the campus as possible to avoid a net transit access reduction on our campus. We acknowledge that the coming Light Rail station will also bring an adjacent Metro Transit Center. We believe a Light Rail Station less than adjacent to campus will draw our campus transit services off our campus and make transit access less accessible for our many users:

Therefore, we endorse the development of the Sound Transit "Highline College Station" as close to our campus as possible.

Passed By Council Action: May 5, 2015

Ruth Krizan
211 SW 184th
Norm. Park, WA
98146

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phone
(206) 592-3215

fax
(206) 592-3752

web
http://ds.highline.edu

206-734-
2943

Response to Comment LC9-1

Sound Transit has a formal process for naming stations that occurs during final design. This is a public process and students, along with other members of the public, will have an opportunity to have input on the station name.

Please see response to Common Comment 4 in Table 9-6 of Chapter 9 of the Final EIS.

Letter FW181

Associated Students of Highline College, Laura Yanez

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1 And, hopefully, Sound Transit will work with the cities
2 involved to find the most cost-effective and best use of
3 land.

4 MS. STRAUZ-CLARK: Next up are three
5 people -- Laura Yanez, Latonya Brisbane, and Ruth
6 Krizan -- followed by Ariana Thomas, followed by Kevin
7 Morris.

8 Please state your names and spell your last
9 names.

10 MS. YANEZ: Laura Yanez, Y-a-n-e-z.

11 MS. BRISBANE: Latonya Brisbane,
12 B-r-i-s-b-a-n-e.

13 MS. KRIZAN: Ruth Krizan, K-r-i-z-a-n.

14 **FW181** MS. Yanez: My name is Laura Yanez. And I'm
15 the Student Body President, and this is my team. We all
16 three are in the student government.

17 So the student government have been thinking
18 about how to approach and how to have input in this
19 project. That is their only -- going to impact our
20 students, but also our community.

21 So we decide to bring a resolution to present
22 the students. And this resolution passed in our student
23 government council meeting on May 5th. And I have
24 copies of that. So tonight, in behalf of the 17,000
25 students registered at Highline College, we resolve to

Response to Comment LC1-1

Sound Transit has a formal process for naming stations that occurs during final design. This is a public process and students, along with other members of the public, will have an opportunity to have input on the station name.

27

LCF-1

1 endorse -- to endorsing a new station called Highline
2 College Station, in tradition of naming stations by
3 local landmarks.

4 We have been here for 50 years, and we are
5 more likely to be here for another 50 years or probably
6 more. We're supporting a station on Pacific Highway
7 South, and we also would like to have a station as close
8 to our campus as possible.

9 MS. KRIZAN: Yes, as Laura said, we represent
10 the students. And we have 17,000 students at Highline
11 College. And these students live in Des Moines, Kent,
12 Federal Way, SeaTac, Burien, Tukwila, Renton, Tacoma,
13 and probably elsewhere. So I think the accessibility of
14 having the station as close to our campus as possible
15 would really benefit our students and help Highline in
16 the future.

17 They need more students that will be able to
18 come here because of the accessibility. Another reason
19 why we want it closer to our campus is the opportunity
20 to develop the area. We have thousands of students that
21 are international students.

22 And I think that maybe building some housing
23 for them and developing the area -- something like we
24 have in Kent Commons where all kinds of shops and
25 things -- would really benefit our community here. And

Letter FW182

Associated Students of Highline College, Ruth Krizan

Page 1

27

1 endorse -- to endorsing a new station called Highline
2 College Station, in tradition of naming stations by
3 local landmarks.

4 We have been here for 50 years, and we are
5 more likely to be here for another 50 years or probably
6 more. We're supporting a station on Pacific Highway
7 South, and we also would like to have a station as close
8 to our campus as possible.

9 **FW182** MS. KRIZAN: Yes, as Laura said, we represent
10 the students. And we have 17,000 students at Highline
11 College. And these students live in Des Moines, Kent,
12 Federal Way, SeaTac, Burien, Tukwila, Renton, Tacoma,
13 and probably elsewhere. So I think the accessibility of
14 having the station as close to our campus as possible
15 would really benefit our students and help Highline in
16 the future.

17 **LC2-1** They need more students that will be able to
18 come here because of the accessibility. Another reason
19 why we want it closer to our campus is the opportunity
20 to develop the area. We have thousands of students that
21 are international students.

22 And I think that maybe building some housing
23 for them and developing the area -- something like we
24 **LC2-2** have in Kent Commons where all kinds of shops and
25 things -- would really benefit our community here. And

Response to Comment LC2-1

Please see response to Common Comment 4 in Table 9-6 of Chapter 9 of the Final EIS.

Response to Comment LC2-2

The City of Kent has been planning for denser mixed-use development in the Midway Subarea, east of the Highline College campus. Potential future land uses are described in Section 4.2, Land Use, of the Final EIS.

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No Comments

1 I really thank you for the opportunity to share.

2 MS. BRISBANE: So I'm here on behalf of the
3 Thunder Watch Safety Committee. And a big concern of
4 ours is in dealing with the ridership count that Sound
5 Transit has provided -- between the 5,000 and 9,000 --
6 between all 9 stops that have been discussed.

7 So our interest is for the safety of our
8 students. And, that being a major priority, we're
9 hoping that you seeing that the ridership for the stop
10 that would be here at Des Moines would help alleviate
11 some of that concern and the safety of our students
12 walking from the farthest distance and, rather, having
13 it closest to Highline as possible to help with that.

14 We also are interested in getting more
15 students on public transportation. And we found that if
16 more -- if the stop is closer to Highline, it's likely
17 that students would -- would ride it more so than having
18 it be at a farther distance. And I think that's it for
19 me. So thank you.

20 MS. STRAUZE-CLARK: Up next is Ariana Thomas,
21 followed by Kevin Morris, followed by -- I think it's
22 Koro Harioniishi.

23 Please state your name and spell your last
24 name.

25 MS. THOMAS: Ariana Thomas, T-h-o-m-a-s. So

Letter FW183

Associated Students of Highline College, Latonya Brisbane

Page 1

Response to Comment LC3-1

Please see response to Common Comment 4 in Table 9-6 of Chapter 9 of the Final EIS.

28

1 I really thank you for the opportunity to share.

2 **FW183** MS. BRISBANE: So I'm here on behalf of the
3 Thunder Watch Safety Committee. And a big concern of
4 ours is in dealing with the ridership count that Sound
5 Transit has provided -- between the 5,000 and 9,000 --
6 between all 9 stops that have been discussed.

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20 MS. STRAUZ-CLARK: Up next is Ariana Thomas,
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22 Koro Harioniishi.

23 Please state your name and spell your last
24 name.

25 MS. THOMAS: Ariana Thomas, T-h-o-m-a-s. So

Letter FW297

30th District Democrats

Page 1

From: prrdigit@box920.bluehost.com
To: FWLE
Subject: Comment - ST Federal Way Link Extension
Date: Sunday, May 17, 2015 11:32:16 PM

From: Tim Burns <chair@30thdems.org>

Message Body:
SR 99 Comment:

I-5 Comment:

SR 99 to I-5 Comment:

I-5 to SR 99 Comment:

Environmental Comment:

Other Comment: The 30th District Democrats passed the below resolution on May 6, 2015.

Resolution in support of a Pacific Highway / SR 99 orientation for the southern leg of the Link Light Rail from SeaTac to Federal Way

WHEREAS light rail works best and is most cost-effective when it serves walkable neighborhoods where people actually live;

WHEREAS research by Sound Transit has shown that potential Link light rail alignments along State Route 99 (Pacific Highway S) would be able to match or nearly match the twelve minute travel time of the fastest I-5 option, while serving 26,000 to 26,500 riders;

WHEREAS running Link along SR 99 would allow for double or even quadruple the potential for transit-oriented development than any alignment along I-5;

THEREFORE BE IT RESOLVED, we the 30th District Democrats endorse a Pacific Highway / SR 99 orientation for the southern leg of the Link Light Rail from SeaTac to Federal Way as a forward-thinking means of helping to develop a dense, walkable, urban core for the City of Federal Way.

Approved on May 6th, 2015 by the 30th District Democrats
Tim Burns, Chair

Name: Tim Burns
Address: P.O. Box 3268
City: Federal Way
State: WA
Zipcode: 98063

Email: chair@30thdems.org

I live nearby. If so, where?:

I work in the project area. If so, where?:

I own a business nearby. If so, where?:

I attend school in the project area. If so, where?:

Other (please specify): The 30th District Democrats has more than 100 paid members from the 30th

Response to Comment LC4-1

Please see response to Common Comment 1 in Table 9-6 of Chapter 9 of the Final EIS. Indirect effects from TOD are described in Section 4.2, Land Use, of the Final EIS. The Preferred Alternative is the lowest-cost alternative.

Legislative District, which includes the entirety of Federal Way, Algonia, Pacific and Milton, as well as parts of Des Moines, Auburn, and unincorporated King County. The resolution passed by a wide margin and has broad support in our organization.

--

This e-mail was sent from a contact form on ST Federal Way Link Extension (<http://federalwaylink.org>)

No Comments

Letter FW365

30th District Democrats

Page 1

Response to Comment LC5-1

Please see response to comment letter FW297.

From: [Myers, Tralayne](#)
To: [FWLE](#)
Subject: FW: Federal Way Link Light Rail Extension
Date: Wednesday, May 27, 2015 10:13:17 AM
Attachments: [2015 30 LD PES Link Light Rail Route.docx](#)

From: Tim Burns [mailto:chair30lddems@aol.com]
Sent: Monday, May 25, 2015 9:52 PM
To: Myers, Tralayne; allison.gregg@soundtransit.org
Subject: Federal Way Link Light Rail Extension

Ms. Myers and Ms. Gregg,

As Chair of the 30th Legislative District Democrats I am writing to inform you of the action taken by our organization.

On May 6, 2015, the 30th LD Democrats voted to endorse the attached resolution regarding the routing of the Link Light Rail extension to Federal Way. This was done by majority vote of our 100 + members after discussion and a presentation by Councilmember Upthegrove and a Sound Transit staff member. Our members reside in the south sound region, primarily in Federal Way and this proposed extension is very important to us

Please consider this our collective citizen comment in the process of selecting the future routing of the extension of the light rail system to Federal Way.

Thank you,

Tim

Tim Burns
Chair
30th LD Democrats
253-874-6292

LC5-1



Resolution in support of a Pacific Highway / SR 99 orientation for the southern leg of the Link Light Rail from SeaTac to Federal Way

LC5-1

WHEREAS light rail works best and is most cost-effective when it serves walkable neighborhoods where people actually live;

WHEREAS research by Sound Transit has shown that potential Link light rail alignments along State Route 99 (Pacific Highway S) would be able to match or nearly match the twelve minute travel time of the fastest I-5 option, while serving 26,000 to 26,500 riders;

WHEREAS running Link along SR 99 would allow for double or even quadruple the potential for transit-oriented development than any alignment along I-5;

THEREFORE BE IT RESOLVED, we the 30th District Democrats endorse a Pacific Highway / SR 99 orientation for the southern leg of the Link Light Rail from SeaTac to Federal Way as a forward-thinking means of helping to develop a dense, walkable, urban core for the City of Federal Way.

Letter FW524

Transportation Choices

No Comments

Page 1

From: [Andrew Austin](#)
To: [FWLE](#)
Cc: [Levy, Chelsea](#)
Subject: Federal Way Light Rail Extension DEIS Comment Letter
Date: Tuesday, May 26, 2015 5:04:30 PM
Attachments: [Federal Way Link DEIS Letter Transportation Choices and Partners.pdf](#)

Mr. Ridge and the Federal Way Light Rail Extension Project Team,

Attached is our formal comment letter on the Federal Way light rail extension DEIS authored and signed by Transportation Choices and numerous partner organizations.

Please do not hesitate to contact me if you have any questions regarding our comments and we look forward to working with you to move forward this critical piece of regional transit infrastructure.

Sincerely,

Andrew Austin

Andrew Austin
Policy Director

Transportation Choices
Transit for all!

Phone: 253.732.9434
www.transportationchoices.org
[Find us on Facebook](#)
[Follow us on Twitter](#)

May 26, 2015

Mr. Cathal Ridge
Federal Way Link Extension Draft EIS Comments
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Dear Cathal –

On behalf of Transportation Choices, Washington Bikes, Puget Sound Sage, OneAmerica, Housing Development Consortium of Seattle-King County, Futurewise, Forterra, Feet First, and Cascade Bicycle Club, we would like to formally comment on the Federal Way Link Extension Draft EIS. We have organized our comments into several sections focused on preferred alignment, station locations, parking impacts, bike/pedestrian/transit access, and social equity. Choosing alignments for light rail are 100 year decisions and we need to make choices that reflect the potential for transit oriented communities for the coming decades. We must not let short-term concerns outweigh these long-term decisions. Light rail has the potential to transform communities in a positive way if we do it right. Let's pick the option that will bring new riders, foster transit oriented communities, create new ways to access transit by foot, bike and bus and best serve low-income people and people of color.

In addition, we'd like to commend Sound Transit staff for the accessibility of the DEIS. Rarely have we come across a DEIS that presented such technically complicated performance measures across multiple alignments as clearly as this DEIS does; particularly in the booklet summary on route alignment and station alternatives impacts. The DEIS very intentionally showcased alignment and station location options in a format that made it easy for both technical and lay persons alike to immediately grasp the tradeoffs apparent between options. This is amongst the best work we've seen Sound Transit undertake and would like to thank the staff and project team for the approach they took on this DEIS. It's a model we hope to see replicated in future ST alignment discussions.

We welcome the opportunity to talk with you more specifically about any of the issues outlined in the letter and are grateful for the opportunity to provide feedback to Sound Transit on this important topic.

Preferred Alignment

While there were 14 different alignment options outlined in the DEIS, our organizations would strongly support a full 99 alignment with the proposed stations at 216th and 260th. We believe that the full SR99 alignment would maximize TOD opportunities, ridership potential, bike/ped/transit access, would do the most to meet our state and regional greenhouse gas emissions reduction goals, and maximize future economic development potential. The SR 99 alignment has the highest ridership, best TOD analysis at each proposed station location, offers the best potential to reduce municipal infrastructure costs, and will provide better access to regional destinations and amenities. South King County has major gaps in its current transit infrastructure. Analysis done by our organizations has shown that students in major swaths of Renton, Sea-Tac, Burien, Kent, and Auburn that are trying to access Highline College or Green River College need to travel more than an hour on 2 or 3 buses in order to access affordable higher educational opportunities. The SR 99 option would provide frequent and reliable transit to option to Highline and dramatically reduce the wide 'transit deserts' in South King County that result in increased car dependency, environmental impacts, and public health disparities.

Station Locations

Light rail gives us a once in a generation opportunity to create affordable transit communities that connect people to opportunity. We must choose station location options that leverage our investment in transit to foster these communities. The preferred station locations should maximize ridership and create opportunities to attract new riders by increasing the potential for transit-oriented development (TOD). Per the analysis of Sound Transit, the I-5 options offer the lowest potential for TOD amongst the options under consideration, which is why we're supporting the SR99 alignment.

Response to Comment LC6-1

Chapter 8, Alternatives Evaluation, includes a comparison of alternatives and shows the trade-offs between alternatives, including ridership, cost, and environmental impacts.

Response to Comment LC6-2

Please see responses to Common Comments 1 and 4 in Table 9-6 of Chapter 9 of the Final EIS. Without stations at S 216th and 260th Streets, these areas would still be accessible from RapidRide A Line. Commuters would be able to transfer between RapidRide A Line and light rail.

Response to Comment LC6-3

Please see responses to Common Comments 1 and 8.

LC6-4	<p>We are also strong advocates for the inclusion of 216th and 260th street stations. The DEIS booklet shows the 216th and 260th street station as some of the strongest stations in the proposed alignment for TOD potential (behind Federal Way). And both of those stations perform very well on the access performance measure particularly due to their proximity to RapidRide stations, good pedestrian infrastructure within the walkshed, and good auto vehicle access for communities east of I-5. We would also strongly recommend a link light rail station that serves the west side of 99 at Highline College. A direct, safe, and accessible connection at Highline, without needing to avoid to crossing a busy 5-6 lane state highway, must be of the highest importance for Sound Transit.</p>	LC6-5
LC6-6	<p>The future Downtown Federal Way Station provides a tremendous opportunity to foster development of a walkable, affordable community with opportunities for economic development and easy access to frequent and reliable transit. Therefore we strongly support the two potential station sites near the Federal Way Transit Center or the alternative near SR-99 at S 316th Streets. All three station sites can be reached via an SR-99 or I-5 alignment. The two proposed station sites nearest I-5, at the Federal Way Park & Ride or near Truman High School, have very low TOD potential and should not be chosen.</p>	
LC6-7	<p>Parking Impacts We know that ST hears about need for more parking at nearly every local meeting in South King County. Across the entire light rail network, and in this corridor in particular, we would like to see Sound Transit charge for parking to mitigate the need for increased parking structures and encourage more people to walk and bike and use transit connections for accessing light rail stations. In addition, we would like to see Sound Transit work with local communities on a public/private parking assessment to determine the parking utilization rates at nearby surface lots. We believe there is a market for Sound Transit to lease nearby under-utilized lots for the short term (and possibly long term) to help reduce the cost of building out significant new parking structures. That said, we recognize this charge could put a heavy burden on low-income transit riders. Therefore, we suggest you consider joint development of Park & Ride sites to include affordable housing and/or accept low-income bus fare passes on Sound Transit buses, which provide the primary commute routes to Seattle for South King County suburbs.</p>	LC6-8
LC6-9	<p>We commend the plan to remove parking spots at Kent/Des Moines when it is no longer the terminus of the line. Conversion of that land to TOD and more active uses should continue to be a priority for Sound Transit and we'll be working with local governments, citizens, and the private sector to ensure Sound Transit's commitment to this goal.</p>	
LC6-10	<p>Bike, Pedestrian, and Transit Access One of the first set of projects to be cut from the ST2 plan during the Great Recession were the South King County access projects which would have provided better bike, pedestrian, and (possibly) transit access to station locations in South King County along the Sounder line. As revenues rebound and the agency readies for ST3, we'd like to see those access funds return to Sound Transit's Sounder plans. In addition, we'd like to see Sound Transit work closely with local governments and King County Metro to increase the opportunity for people to bike, walk, and take the bus to light rail stations along the alignment. This should include both increased covered, secure bike parking at the stations as well as the construction of protected bike lanes and other bike infrastructure within FTA's three mile catchment area around the stations to broaden the potential ridership. Increased pedestrian infrastructure around the stations should also be a priority for Sound Transit. We commend Sound Transit and the project team for their bike/ped analysis of the actual walk/bike shed around the stations, rather than a standard ¼, ½, or 1-mile buffer that does not take into account the actual conditions on the ground. Sound Transit's analysis in the transportation technical appendices section 4.6 reinforces both the strong potential of encouraging walking, biking, and taking the bus to future light rail stations on the corridor, but also reinforces the very large potential catchment of the proposed 216th and 260th street stations. Coordination with King County Metro in South King County will also be a key way to extend the reach of light rail's potential ridership catchment. Working to improve both the east-west transit connectivity to light rail stations as well as ensuring easy transfer capabilities to the existing RapidRide service on the corridor should be a top priority.</p>	LC6-11

Response to Comment LC6-4

Please see response to Common Comment 1.

Response to Comment LC6-5

Please see response to Common Comment 4.

Response to Comment LC6-6

Your support for a Federal Way Transit Center station near SR 99 at S 316th Street due to TOD potential has been noted. Please see response to Common Comment 11.

Response to Comment LC6-7

Please see response to Common Comment 5. Sound Transit is not proposing to charge for parking as part of this project. The policy framework for parking management is in place, and both the Board-adopted ST3 plan language and financial plan assume fully managed parking in the future. The 2016/2017 implementation of permit parking at 10 ST facilities is a first step in the broader parking management discussion. Further Board action and regional coordination will be required before a commitment to paid parking at FWLE and other facilities can be made.

Response to Comment LC6-8

Sound Transit offers low-income fares for all its forms of transit (light rail, bus, and Sounder train). Sound Transit's Transit-Oriented Development Policy includes goals for providing affordable housing in station areas. As described in Section 7.6.3 of Chapter 7, Environmental Justice recent state legislation authorizing Sound Transit to seek funding for ST3 created additional requirements intended to maximize opportunities for affordable housing. It requires Sound Transit to offer properties considered suitable for housing first to a defined class of qualified entities, including cities, housing authorities, and nonprofit housing developers. Because the requirement is contingent on the successful passage of the ST3 ballot measure, the Sound Transit Board of Directors

will determine how it will implement the law in late 2016 or early 2017. This will likely require amendments to the TOD and Surplus Property Disposition Policies, and new administrative procedures. Many of the future Sound Transit TOD parcels in FWLE station areas will likely need to be evaluated for suitability for housing; affordable housing may be a substantial programmatic element in all station areas.

Response to Comment LC6-9

Please see response to Common Comment 5. As described in Chapter 2, Alternatives Considered, of the Final EIS, the Preferred Kent/Des Moines Station would have approximately 1,000 parking spaces (500 surface, 500 in a new garage) if it is used as an interim terminus. Parking would then be reduced to 500 spaces at this station when the system is extended south, with additional parking at other stations.

Response to Comment LC6-10

Sound Transit completed a Sounder Station Access Study in 2012, and planning for access improvements at the Puyallup and Sumner stations has been underway since 2014. Planning for access improvements at the Auburn and Kent stations began in 2016 when funding became available.

Response to Comment LC6-11

Sound Transit is committed to working with the local jurisdictions, including the cities and King County Metro, to improve access to the FWLE stations. Sound Transit held stakeholder workshops that included local jurisdictions and King County Metro, which helped identify needs for improved non-motorized access to station areas and clarify zones of responsibility for funding and building such improvements. The Conceptual Transit Plan for this project was also updated in coordination with King County Metro and includes new routes and more frequent service for existing routes to improve access to the Preferred Alternative stations. The transit analysis in Appendix G1 and Chapter 3 of the Final EIS reflects this.

Environmental Health
 The SR 99 alignment will place station areas farther away from the harmful air pollution and particulates generated by vehicle traffic on interstate 5. A growing body of research points to the evidence that traffic emissions on roads with high average daily traffic are causally related to increased rates of asthma, cancer, and other respiratory issues. Because traffic volumes are more than an order of magnitude higher on I-5, the SR 99 alignment presents far less environmental health risks to riders and residents. Ensuring the health of both riders and residents is consistent with the Sound Transit Long Range Plan, which calls for making, “facility siting decisions will support the environmental health of transit users and residents of transit-oriented developments.” (page 18). Perhaps most important for this corridor, locating transit oriented development around station areas away from the air pollution generated by I-5 will help lessen the already pronounced health disparities in South King County

Social Equity
 As Sound Transit mentions in the DEIS, this corridor has a high concentration of transit dependent populations who need efficient and reliable regional transit connectivity. We strongly believe that the SR 99 alignment would best serve today’s transit dependent populations (low-income people and people of color) as well as future transit dependent populations. An SR 99 alignment that directly serves the west side of 99 at Highline College would provide a direct access point rather than forcing students, faculty, and staff to cross a busy 6 lane state highway. Easy and safe access to frequent light rail will give thousands of riders new transit options to get to school affordably and reliably. The SR 99 option would be safer, resulting in fewer (if any) accidents and would be consistent with Washington State’s Target Zero goals. The alternatives that would require crossing SR99, a very busy state route with as many as 40,000 cars a day would create lots of opportunities for pedestrian/car conflicts that would be easily avoided by serving Highline on the west side of 99.

The amendments to the long-range plan, published in December 2014, demonstrate the intent of Sound Transit to promote health for existing residents, and provide equitable access to transit by to low-income populations. Federal Way’s communities of color, including many immigrants and refugees, tend to suffer health and economic disparities that can be exacerbated by poor urban planning. As transit-dependent populations, quality of life in these communities could improve significantly with equitable TOD projects that prioritize the inclusion of affordable housing, commercial space that accommodates culturally-relevant small businesses that provide living wage jobs, cultural anchors for immigrant and refugee communities, and bike/ped light rail access. As Sound Transit nears its decision and plans for implementation, we encourage the use of racial equity analysis and provisions for sustained, culturally appropriate engagement with local communities. Sound Transit cannot achieve the goals set forth in the Long Range Plan without planning for equitable transit-oriented development around station areas.

Additional Corridor Option for Study
 We would also like to see Sound Transit do further analysis of a 99-I-5 hybrid that was not included in the original DEIS. The alignment would proceed south on SR 99 from the existing Angle Lake terminus on SR99, would include a station at 216th, would include a station on the west side of 99 to serve Highline College, loop back to I-5 south of the Lowe’s and 240th as outlined in the alternative on page 34 of the DEIS booklet, continue on I-5 south to serve the Star Lake Park and Ride, and then stop at Federal Way to serve the Federal Way Transit Center. We are curious about the cost, TOD potential, ridership potential, and displacement that would result from this option and would request that Sound Transit provide some follow up figures to us with a rough outline of figures in each of those performance measures.

Thank you for the opportunity to provide comments. Please contact us should you have any questions.

Sincerely,

Rob Johnson, Executive Director, Transportation Choices
 Jeff Aken, Advocacy Director, Cascade Bicycle Club
 Lisa Quinn, Executive Director, Feet First
 Gene Duvernoy, President, Forterra

Response to Comment LC6-12

Section 4.6, Air Quality, of the Final EIS describes existing air quality in the corridor. The SR 99 and Preferred alternatives both have Kent/Des Moines stations near SR 99 and both have Federal Way Transit Center stations near the transit center. The S 272nd Station associated with the Preferred Alternative and SR 99 to I-5 Alternative would be closer to I-5 than the S 272nd Redondo Station associated with the SR 99 and I-5 to SR 99 alternatives.

Response to Comment LC6-13

Please see responses to Common Comments 4 and 6 and response to comment LC6-8 in this letter. A station west of SR 99 would not require crossing SR 99 to access Highline College; however, the majority of riders at this station are expected to be transit transfers from the station or from RapidRide A Line on SR 99. Riders transferring from RapidRide A Line would need to cross SR 99 for one direction of their travel regardless of the station location.

Sound Transit has reached out to minority and low-income populations throughout the FWLE project. It will continue to reach out to provide information and opportunities to comment, and to implement new opportunities to ensure minority and low-income populations are engaged, and remain engaged, in the project. Chapter 7, Environmental Justice, and Appendix B, Public Involvement and Agency Coordination, of the Final EIS describe the outreach that Sound Transit has performed and the efforts moving forward. Section 4.4, Social Impacts, Community Facilities, and Neighborhoods, and Chapter 7 describe Sound Transit’s Transit-Oriented Development Policy related to affordable housing in station areas. Jurisdictions along the FWLE corridor have adopted affordable-housing goals and policies in their comprehensive plans.

Section 7.7, Project Benefits, in Chapter 7 describes how all of the alternatives would provide benefits to transit-dependent populations, such as improved access to transit and employment and increased

reliability of transit service. Studies have shown that these benefits can accrue to a higher degree for minority and low-income populations.

Response to Comment LC6-14

This hybrid was not analyzed in the Draft or Final EIS because it would be very similar to the SR 99 to I-5 Alternative. To cross from SR 99 to I-5 south of Lowe's would increase business and/or residential displacements and potentially increase the length of guideway in the Midway Landfill. The vacant property directly south of Lowe's is currently in permitting for an affordable housing project, and other properties in this area are developed with commercial uses, a mobile home park, and the Midway Landfill. See Appendix C, Alternatives Analysis Reports, for additional information on the development of the SR 99 to I-5 Alternative.

Locating the station on the west side of SR 99 instead of the east side of 30th Avenue S (where it is with the SR 99 to I-5 Alternative) would not substantially change ridership. It would be less optimal for supporting planned TOD in the Midway Subarea.

No Comments

Bryce Yadon, State Policy Director, Futurewise
Kelly Rider, Policy Director, Housing Development Consortium of Seattle-King County
Rich Stolz, Executive Director, OneAmerica
Rebecca Saldaña, Executive Director, Puget Sound Sage
Barb Chamberlain, Executive Director, Washington Bikes

Letter FW596

Kent Bicycle Advisory Board

No Comments

Page 1

From: [Melvin Roberts](#)
To: [FWLE](#); [Suzette Cooke](#); [Tim LaPorte](#)
Cc: [Dennis Higgins](#); [Dana Ralph](#); [Dr. Deborah Ranniger](#); [Les Thomas](#); [Bill Boyce](#); [Brenda Fincher](#); [Jim Bering](#); [Sam Harill](#); [Leona Warner](#); [Mark Howlett](#); [Charlene Anderson](#); [Monica Whitman](#); [Andrea Clinkscales](#); [Cascade Bike PAC Brock Howell](#)
Subject: Link Light Rail Extension
Date: Tuesday, May 26, 2015 1:02:52 PM
Attachments: [Comments DEIS FedWayLinkExt.2015.docx](#)

Sound Transit

Enclosed is a letter with comments about the Federal Way Link Extension and how it could provide value to the people in the area that it will serve.

Mel Roberts
Chairman, Kent Bicycle Advisory Board
9421 S 241st St, Kent WA, 98030
425-417-8931 cell

Date: May 26, 2015
 To: Sound Transit: via e-mail at FWLE@soundtransit.org
 Attn: Federal Way Link Extension Draft EIS comments
 Subject: Federal Way Link Light Rail Extension (FWLE)

Congratulations

The documentation and comparison data you have put together shows a great deal of thought about transit and where to locate it. When I put on my bicycle hat (which nearly all the time), I had hoped to see more future connectivity to the larger neighborhood via bicycle facilities. It's easy to ride 2-3-4 miles on bicycle to a destination like the train station. Connecting the stations with a trail would serve to connect many trip targets between the stations together. I would like to see a multi-use trail between I-5 and SR-99 that runs from Seatac to Federal Way that serves transit stations, residential units and various neighborhood shopping and dining locations.

People oriented development.

This document contains comments on the project based on the contents of the draft EIS April 2015.

These comments were created by Mel Roberts, Chairman of the Kent Bicycle Advisory Board, and are intended to reflect a forward looking view for a people-friendly neighborhood. This view expands the idea of a Transit Oriented Development (TOD) to a view that embraces a people-oriented development that fully supports walking, cycling, and transit. This view reduces the dependency on automobile use.

Provide sidewalks and bike facilities.

It should be obvious that the walk-able and ride-able neighborhoods would have pedestrian and bike facilities, I.E., sidewalks and bike facilities. The sidewalks and trails should provide connections for walkers and the bicycle riders who chose to ride away from traffic (kids, seniors, and timid adults). In the whole area served by FWLE the facilities for walkers and sidewalk riders should connect: homes, shopping, and services not just transit. Likewise, in the whole area served by FWLE the multi-use trails, bike lanes and cycle-tracks provided for people who ride bicycles as vehicles should likewise connect: homes, shopping, and services. The bigger focus development and redevelopment of this area is to create people-friendly neighborhoods with transit stations.

Service road/multi-use trail.

After cycling under and riding in the Sky Train in Vancouver BC, it would be great if the LWLE was constructed with a service road alongside (or underneath) its entire length. This service road would: 1) provide access via trail to the stations, 2) provide access to trail users around the station, 3) provide emergency access to any train stalled on the guideway, 4) it primarily serves as a multi-use trail for pedestrians and bicycle riders, 5) it provides ground level access for routine maintenance of vegetation and guideway from the ground level, and 6) its

Response to Comment LC7-1

Sound Transit initiated an early scoping process for the FWLE in 2012. Early scoping provided the first opportunity for the public to learn about the project and provide their comments at the early planning stage. The information gathered from the public and stakeholders helped form the Purpose and Need as described in Chapter 1 of the Final EIS. Sound Transit also held stakeholder workshops, described in Section 2.1 of Chapter 2 in the Final EIS, which helped identify needs for improved non-motorized access to station areas and clarify zones of responsibility for Sound Transit, local jurisdictions, and others in funding and building such improvements. Sound Transit's System Access Policy establishes a framework for how the agency invests in, manages, and supports infrastructure and facilities to help riders access Sound Transit services. Sound Transit tries to encourage and improve all forms of access to its transit services, focusing on the properties it owns, and works cooperatively with local jurisdictions to promote access from surrounding communities.

Response to Comment LC7-2

Please see response to comment LC7-1 in this letter.

Response to Comment LC7-3

Please see response to comment LC7-1 in this letter.

LC7-3

connectivity will improve the quality of life for the people living nearby. This multi-use trail, in order to provide maximum safety, would cross SR-99 and SR-516 with pedestrian/bike bridge(s) near where the guideway crosses these highways.

LC7-4

Bike capacity

There should be enough lockable storage to accommodate the riders who don't need their bikes on the exit end of their trip. There should be enough room on the trains for riders who need to bring their bikes along for use on the exit trip. Locker access needs to be close to both the streets that are used by bike riders to access the station and the boarding platform of the station. The bicycle loading counts for Federal Way at 10 seems to be way under estimated when the other loading counts are 100+.

LC7-5

Location

From working on the Envision Midway study, it makes sense to have the guideway run near SR-99 (immediately west, in, or immediately east of SR-99) where the station would serve the students from Highline College. It seems feasible FWLE to run along the west side of I-5 from S260th St to the S 272nd St Park and Ride, where the guideway service road could serve the cycling needs of people on the east side of I-5 in the vicinity of S 260th St. The guideway route through Seatac and Federal Way was not something that I studied as part of Envision Midway.

Sincerely submitted

Mel Roberts
Kent Bicycle Advisory Board, Chairman
Cell 425-417-8931

Cc: Mayor City of Kent, Suzette Cooke
Kent Council members
Tim La Porte
Mark Howlett
Monica Whitman
Kent Bicycle Advisory Board members

Sound Transit Offices
401 South Jackson Street
Seattle, Washington 98104

Mel's File :
Bicycling-KBAB/EnvisionMidway/FedWay-LinkLightRail2015/Comments-DEIS-FedWayLinkExt-2015

Response to Comment LC7-4

Each station will have a bicycle storage area with space for expansion. Specific bike facilities at each station will be finalized during final design. Sound Transit projected land uses and planned facilities in 2035 to estimate trip generation by mode. Section 3.5.2, Transit Service and Operations, of the Transportation Technical Report (Appendix G1 of the Final EIS) describes how the mode of access for each station was determined. The walk/bike mode of access for the Federal Way Transit Center Station was updated to 50 people per hour for the Final EIS based on changes in the ridership model.

Response to Comment LC7-5

Please see response to Common Comment 4 in Table 9-6 of Chapter 9 of the Final EIS. A service road along the entire guideway is not needed for operation of the FWLE.

Letter FW614

Futurewise

No Comments

Page 1

From: [Bryce Yadon](#)
To: [FWLE](#)
Subject: Federal Way Link Extension DEIS Comments
Date: Tuesday, May 26, 2015 4:52:31 PM
Attachments: [image001.png](#)
[Federal Way Extension Alignment - Comment Letter FINAL.pdf](#)

Cathal Ridge –

Please see the attached comment letter from Futurewise on the Federal Way Link Extension Draft Environmental Impact Statement.

Bryce Yadon
Futurewise | State Policy Director
816 Second Ave., Ste. 200 | Seattle, WA 98104
p. 206.343.0681 x120 | c. 253.249.4430





May 26, 2015

Mr. Cathal Ridge
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

Re: Federal Way Link Extension Draft EIS Comments

Dear Mr. Ridge:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Sound Transit Federal Way Link Extension. Futurewise is a statewide nonprofit, providing research, planning, and policy, to create livable communities, protect our working farmlands, forests, and waterways, and ensure a better quality of life for present and future generations.

Futurewise strongly supports the next phase of the Federal Way Link Extension. Building this kind of sophisticated, high capacity transit is a once in a century opportunity for south King County and for the central Puget Sound region. With a rapidly growing population and economy, the expansion of LINK light rail enables us to accommodate new housing and jobs without more gridlock, create livable neighborhoods and achieve greater sustainability. We appreciate that there is an urgency to move forward the Federal Way LINK extension. Now is also a good time to reflect on the lessons of past alignment decisions and design this next phase of LINK to be as effective as possible.

We believe that Sound Transit should select the alignment that has the opportunity to achieve the most economic, environmental, and social benefits, including:

- Providing the greatest ridership on public transit,
- Curbing land consumption and thereby conserving working farms and forests and protecting natural ecosystems and water quality,
- Reducing energy consumption and greenhouse gas emissions associated with transportation,
- Promoting health by encouraging walking and bicycling, cutting air pollution and reducing motor vehicle accidents,
- Ensuring access to job and education opportunities to those with the least amount of resources,
- Lowering household expenses for both transportation and housing,
- Reducing municipal infrastructure costs, and
- Meeting the increasing population growth of the central Puget Sound region.

Given the amount of investment and the opportunity for impact, it is critical that this investment achieve the full potential of environmental, economic, and social equity benefits that transit can and should provide for the central Puget Sound region.

Response to Comment LC8-1

Chapters 3 through 7 of the Final EIS describe the benefits and impacts of the FWLE alternatives. Chapter 8, Alternatives Evaluation, focuses on the trade-offs among the alternatives in meeting the project's purpose and need and describes how the benefits and impacts associated with each alternative relate to other alternatives. The Sound Transit Board will consider the impact analysis in the Final EIS, along with several other factors, in selecting the project to build.

LC8-1

Futurewise
Sound Transit Federal Way DEIS Comment Letter
Page 2

Looking at the Transit Oriented Development (TOD) investment that has occurred as a result of earlier LINK investments, mixed use development around LINK station areas has proceeded more slowly than needed to meet demand for living, working and basic services in transit-rich neighborhoods. Many factors combine to slow the pace of TOD including lack of infrastructure, high costs of land acquisition, volatile community and neighborhood support, regulatory barriers like zoning restrictions, and a lack of policies that ensure that land use goals and greenhouse reduction goals are met at least in part by encouraging dense, mixed-use development near transit. These factors make it much harder to implement land-use plans around major transit investments that would produce greater reductions in household costs and vehicle miles traveled. The past – and looking at how far we have come and how far we have yet to go to create effective, equitable transit oriented communities-- is a reminder that the choice of alignment and station areas should not be a short-term decision but a decision with the long-term return on investment as the over-arching goal and objective.

LC8-2 We urge Sound Transit in its decision on the Federal Way LINK extension to commit to taking an intentional approach to not just laying light rail tracks and providing transit, but to helping build transit oriented communities. These transit oriented communities should be designed to ensure that the coordinated transportation, land use, development and investments made near light rail transit stations are directly benefiting all members of the community, especially low- and moderate-income households who depend on transit most in order to connect them to critical basic needs and to opportunities to improve their quality of life.

LC8-3 To achieve the most economic, environmental, and social benefits, we urge you to select the SR99 alignment option, including the additional stations at S 216th and S 260th. Futurewise urges you to consider and select SR99 alignment with these additional stations for the following reasons:

1. The SR99 alignment best fulfills Sound Transit's commitment to TOD as stated in *Resolution No. R2012-24 Sound Transit-Oriented Development (TOD) Policy* and the agency's *TOD Program Strategic Plan*. Sound Transit's Resolution No. R2012-24 and TOD Strategic Plan call for Sound Transit to "evaluate, facilitate and implement TOD as it delivers the regional transit system." Specifically, Sound Transit's own policies and plan call for the agency to achieve the following goals in its implementation of LINK light rail:
 - Encourage creation of transit oriented development, including providing market-rate and affordable housing options, basic services, and access to jobs and education near transit,
 - Increase the value and effectiveness of transit by increasing transit ridership,
 - Support implementation of state, regional and local growth plans, policies and strategies,
 - LC8-4 • Encourage convenient, safe multi-modal access to the transit system, with an emphasis on non-motorized access,
 - Support economic development efforts, and
 - Protect and enhance Sound Transit's assets and investments.

As explained in detail below, SR99 alignment is best suited for achieving these goals.

Response to Comment LC8-2

TOD potential was one of the factors considered by the Sound Transit Board when identifying a Preferred Alternative. An updated summary of TOD potential is included in Section 4.2, Land Use, and the Executive Summary. Local jurisdictions determine zoning regulations and design guidelines for development, including transit-oriented development and requirements for non-motorized improvements. Please see response to Common Comment 8 in Table 9-6 of Chapter 9 of the Final EIS regarding investment in disadvantaged communities.

Response to Comment LC8-3

Please see response to Common Comment 11.

Response to Comment LC8-4

Please see responses to Common Comments 1 and 8. Section 4.2, Land Use, summarizes the TOD analysis updated for the Final EIS. Chapter 8, Alternatives Evaluation, compares the alternatives and shows the trade-offs among them, including ridership, cost, and environmental impacts. Section 3.5.2, Transit Service and Operations, contains updated ridership data.

Futurewise
Sound Transit Federal Way DEIS Comment Letter
Page 3

2. **The SR99 alignment option presents stronger TOD opportunities at every station area.** Indeed, as shown in Sound Transit's *Federal Way Link Extension TOD Study*, the "alignments with stations along SR99 are more supportive of TOD . . . primarily due to three key differentiating factors [access, land use and land with TOD potential]." In addition, to the planned stations at Kent/Des Moines, S 272nd Station and Federal Way Transit Center, the SR99 alignment option provides the opportunity for two additional stations and related TOD at S 216th and S 260th, stations, which would not be possible with an I-5 alignment. These additional stations provide increased opportunity for TOD. Furthermore, the study shows that TOD along the I-5 alignment is severely limited by reduced station access due to I-5, limited land availability, the poor TOD potential of Star Lake Station and the lack of connection points to Rapid Ride. (See *Attachment A: Summary of TOD Support by Geographic Location*.)
3. With increased TOD potential, **the SR99 alignment will provide better opportunities for affordable housing development and help low and moderate income households in Southwest King County reduce living costs.** Southwest King County has historically enjoyed low housing costs compared to the remainder of King County. However, there is still a significant affordable housing challenge in the area. As shown in *Attachment C*, the residents of the cities surrounding the expansion corridor have significant housing burden, meaning they spend more than 30% or 50% of their income on housing cost. In Kent, Des Moines and Federal Way, almost one in five households are severely cost burdened, meaning they pay over 50% of their income on housing. Increasing the supply of housing will reduce housing costs and provide more housing for more families. Additionally, the most significant cost for these households after housing is transportation. **SR99 presents greater opportunities for housing near transit and better access to jobs, schools and basic services, reducing the cost of transportation for households with limited means.** As shown on Attachment B, the majority of destinations and amenities in the corridor are located on SR99, not I-5. (See *Attachment B: Summary of Existing Services and Amenities*.) By increasing affordable housing near transit and providing better access to jobs, schools, and basic services, the LINK extension at SRT99 has the ability to lower significantly the housing and transportation costs of low- and moderate-income households.
4. **The SR99 alignment option with the addition of the S 216th and S 260th stations has the highest opportunity for daily ridership.** Increased transit ridership will make the entire transit system more financially secure and further our region's environmental sustainability goals. According to the DEIS, the SR99 alignment option will generate 27,500 daily riders, far greater than any other option. By generating increased ridership, the SR99 alignment will make the entire transit system more financially sound in the short and long-term. The SR99 alignment's increased ridership will also better support our region's progress towards environmental goals of reducing reliance on automobiles thereby reducing GHG emissions, reducing traffic congestion and increasing regional mobility.
5. **The SR99 alignment more effectively supports implementation of regional and local government planning goals, policies, and investments.** The increased TOD potential of the SR99 alignment better supports the three primary strategies outlined in PSRC's Growing Transit Communities initiative: (a)

Response to Comment LC8-5

As described in Chapter 3, Transportation Environment and Consequences, and Section 4.6, Air Quality and Greenhouse Gases, all FWLE alternatives would have similar reductions in greenhouse gas emissions, reduction in traffic congestion, and increasing regional mobility.

Response to Comment LC8-6

Please see response to Common Comment 1. All of the alternatives increase transit access and support the TOD potential planned for in Kent's *Midway Subarea Plan* and the Federal Way City Center Element of Federal Way's Comprehensive Plan.

attract more of the region's residential and employment growth near high-capacity transit, (b) provide housing choices affordable to a full range of incomes near high-capacity transit, (c) increase access to opportunity for existing and future community members in transit communities.

LC8-6 The SR99 alignment also better supports greater transit access and TOD potential in the PSRC designated regional centers of SeaTac and Federal Way. The SR99 alignment also supports the goals and strategies of the Kent/Des Moines "Envision Midway" Plan in which both the Stakeholder Committee and public preferred the SR-99 alignment, noting that "an alignment along I-5 was seen as antithetical to the tenets of transit oriented development by limited potential development to only west of the station."¹ The SR99 alignment would also better achieve the TOC vision of City Center in Federal Way. Having a centrally located light rail station with easy access to the Federal Way Transit Center is critical to both transit support of existing and future residences and businesses, as well as providing better transit service to people transferring at the center.

In addition to supporting local government policies and goals, by better supporting TOD, the SR99 alignment will reduce municipal costs for local jurisdictions. Transit oriented communities are the best return on investment for local governments. As the PSRC found, "...costs are generally higher with sprawl-type development than with compact development or smart growth", particularly for costs to local governments for physical infrastructure and public services.²

LC8-7 **Finally, the SR99 alignment option will leverage recent investments by local governments to improve SR99.** The cities of Kent, Des Moines, SeaTac and Federal Way have recently made significant investments along SR99 in streetscape, paving and transit amenities including the addition of Bus Rapid Transit by metro in a high occupancy vehicle lane. A light rail alignment along SR99 will enhance these investments and decrease the amount of local, regional and state funding needed to provide additional infrastructure investments which would be required if stations are located along I-5, generally on streets which have not enjoyed this investment. The existence of sidewalks, landscaped medians, bus transit and other amenities will already be in place, increasing accessibility of the new light rail stations.

6. **The SR99 alignment option will create compact, mixed-use communities closer to transit which will better support active transportation trips, which have been shown to promote physical activity and improved health outcomes.** Compact, mixed-use communities better support trips made entirely by walking and bicycling. Walking to and from public transportation helps not only reduce our greenhouse gas emissions, but it also helps improve the health of our communities. Indeed, walking to and from public transportation specifically "helps physically inactive populations, especially low-income and minority groups, attain the recommended level of daily physical activity," and thus, helps "promote and maintain active lifestyles."³

LC8-8

¹ City of Kent, "Midway Subarea Plan," (adopted December, 2011).

² Puget Sound Regional Council, "Information Paper on the Cost of Sprawl" (December, 2005).

³ Besser, Lilah M., MSPH, and Andrew L. Dannenberg, MD, MPH. "Walking to Public Transit Steps to Help Meet Physical Activity Recommendations." *American Journal of Preventive Medicine* 29.4 (2005)

Response to Comment LC8-7

All FWLE alternatives would include improvements in station areas for access. Chapter 5, Construction, of the Final EIS describes how the SR 99 Alternative would include street reconstruction to widen the existing SR 99 roadway on one or both sides in some locations to allow space in the median for construction of the guideway columns. This street reconstruction would also include rebuilding sidewalks to maintain their current width.

Response to Comment LC8-8

Please see response to Common Comment 1.

An alignment which respects the historic land use and development patterns of the area has two important benefits:

- First, it will enhance access to existing businesses, schools, social services, parks, grocery stores and residential development. As stated in the report *From Barriers to Solutions and Best Practices: Urban Centers and TOD in Washington*, “locating key destinations, particularly employment and retail, near transit in conjunction with higher residential densities is necessary to fully leverage accessibility from transit.”⁴ SR99 already enjoys many commercial and institutional uses which will drive transit ridership. Shorter distances to these amenities -- particularly grocery stores and medical facilities -- are critical when supporting non-motorized or transit trips. (See Attachment B: Summary of Existing Services and Amenities.)
- Second, it will decrease the need for immediate new development surrounding the transit stations to increase ridership. In the corridor, where there is limited near-term demand for new commercial and residential space, it is important that there be existing development in place to support the transit system ridership. As stated in the *Federal Way Link Extension TOD Study* by Sound Transit “TOD support in the FWLE corridor is moderate. The market demand is not robust and most of the development predicted for the corridor would likely occur well after the station is constructed.”⁵ Placing stations in existing centers will give the short-term benefit of having transit-supportive destinations in place as well as the long-term benefit of driving new TOD development towards existing activity centers on SR99, supporting economic development efforts in that aging corridor.

7. **Transit investment along the SR99 will support and enhance existing businesses in the SR99 corridor. TOD has demonstrated positive economic development outcomes in many communities.** In “The Best Stimulus for the Money: Briefing Papers on the Economics of Transportation” various empirical studies demonstrated a 40% to 100% premium for residential housing in TOD and commercial premiums of 8% to 40% for commercial property values located near transit.⁶ In section 4.2.3.1 of the DEIS it is noted that “land uses immediately adjacent to SR 99 are predominantly commercial uses...Land uses transition to single-family and multi-family residential west and east of the commercial corridor.”⁷ The SR99 alignment provides for further access to businesses sighted within the commercial corridor, while the I-5 alignment is “mostly surrounded by residential land uses.”⁸ The I-5 alignment limits the access to businesses as well as potential mix-use zoned properties

⁴ Charles R. Wolfe and Paul Symington, “From Barriers to Solutions and Best Practices: Urban Centers and TOD in Washington” (September, 2009).

⁵ Sound Transit, “Federal Way Link Extension Transit Oriented Development Study” (April 2014).

⁶ Nelson et al. The Best Stimulus for the Money: Briefing Papers on the Economics of Transportation” April 2009.

⁷ Sound Transit, “Federal Way Link Extension, Draft Environmental Impact Statement” (April 2015).

⁸ Sound Transit, “Federal Way Link Extension, Draft Environmental Impact Statement” (April 2015).

Response to Comment LC8-9

Please see response to Common Comment 1. The Preferred Kent/Des Moines Station and Federal Way Transit Center Station would be in the same general locations for all alternatives. The RapidRide A Line would continue to provide access to businesses along SR 99 between these stations.

Futurewise Sound Transit Federal Way DEIS Comment Letter LC8-9 Page 6	<p>that also border the SR99 corridor. Providing for access to businesses through high capacity transit will increase foot traffic in the area, as well as reduce car trips, increasing economic opportunity.</p>
LC8-10	<p>8. The SR99 alignment and related TOD will place people farther away from the harmful air pollution generated by vehicular traffic on I-5 and generate better health outcomes. Amendments adopted on December 18, 2014 to the long range plan support the SR99 alignment for this very reason. Specifically, those amendments state: “facility siting decisions will support the environmental health of transit users and residents of transit-oriented developments”. (See December 18, 2014 Amendments, T-21.) According to the EPA, “people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic including higher rates of asthma onset and aggravation, cardiovascular disease, impaired lung development in children, pre-term and low-birthweight infants, childhood leukemia, and premature death.” These impacts are most closely associated with air pollution within 500 to 600 feet of a major roadway.⁹</p> <p>The I-5 alignment will put transit riders as well as residents, employees, or visitors to any related TOC in close proximity to much higher traffic volumes, and thus, exposed to greater air pollution. As seen in Attachment D, traffic volumes on I-5 from SeaTac to Federal Way range from 160,001 to 999,999, significantly higher than SR99 which are typically in the 20,001 - 40,000 range.</p> <p>The potential negative health impacts from an I-5 alignment are of particular concern in Southwest King County given the already significant health disparities found there. According to King County Public Health, residents in SeaTac/Tukwila, Des Moines, Kent and Federal Way have significant health disparities as a result of air pollution caused by vehicular traffic, including higher rates of stroke, asthma, coronary heart disease, chronic respiratory disease and lower life expectancy than in King County as a whole. (See Attachment E: Health Outcomes in Select Communities).</p>
LC8-11	<p>Sound Transit has demonstrated a commitment to TOD in <i>Resolution No. R2012-24 Sound Transit-Oriented Development (TOD) Policy</i>, which provides “a framework in which Sound Transit will evaluate, facilitate and implement TOD strategies....” The agency has followed through on the commitment to <u>evaluate</u> TOD in the Federal Way Corridor, and the results clearly demonstrate that SR99 alignment is significantly more supportive of TOD. It is now time for Sound Transit to follow through on the commitment to do their part to <u>facilitate</u> and <u>implement</u> TOD by selecting the SR99 alignment option.</p> <p>The residents of Puget Sound have continued to support the expansion of Sound Transit, voting to tax themselves to ensure that our region continues to invest in a quality transit system. The residents and businesses of this region deserve a system which achieves the greatest return on investment possible. By choosing the SR99 alignment which has greater TOD potential, Sound Transit will not only achieve a more financially sustainable transit system in the long-term, but greater benefits to the environmental</p>
LC8-12	<p>⁹ Environmental Protection Agency, “Near Roadway Air Pollution and Health.” (n.d. Web. 15 May 2015).</p>

Response to Comment LC8-10

Section 4.6, Air Quality, of the Final EIS describes existing air quality in the corridor. The SR 99 and Preferred alternatives both have Kent/Des Moines stations near SR 99 and both have Federal Way Transit Center stations near the transit center and therefore would not differ in exposure to air pollution. The S 272nd Station associated with the Preferred Alternative and SR 99 to I-5 Alternative would be slightly closer to I-5 than the S 272nd Redondo Station associated with the SR 99 and I-5 to SR 99 alternatives. The period of time that riders would be at the S 272nd Star Lake Station waiting for a train would be 15 minutes or less, and adverse health effects would not be expected from this short duration.

Response to Comment LC8-11

Please see response to Common Comment 1. Sound Transit updated the TOD analysis in Section 4.2, Land Use, of the Final EIS.

Response to Comment LC8-12

Please see response to Common Comment 1.

LC8-12

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Sound Transit Federal Way DEIS Comment Letter
Page 7

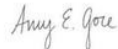
sustainability, economic strength and social equality and health of our region for present and future generations.

Thank you for the opportunity to comment on this critical issue.

Sincerely,



Bryce Yadon
State Policy Director



Amy Gore
Sustainable Communities Director

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Page 8

No Comments

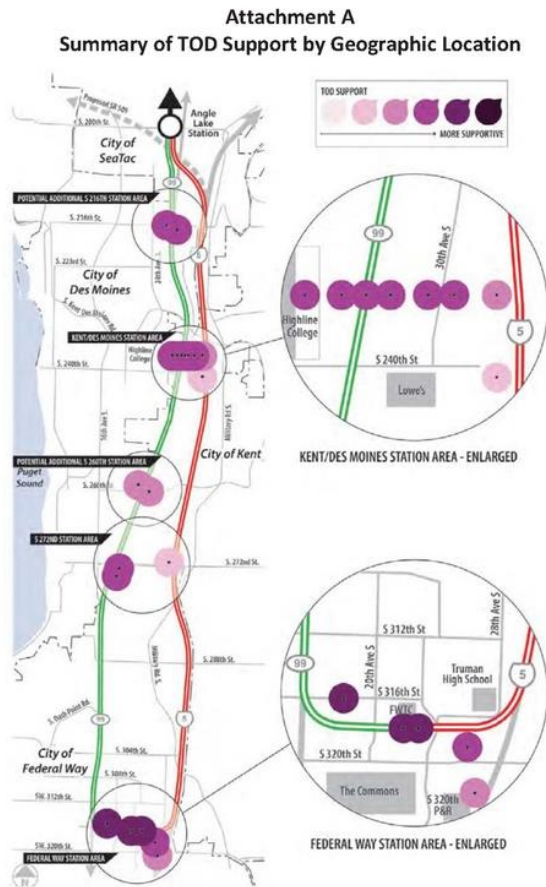


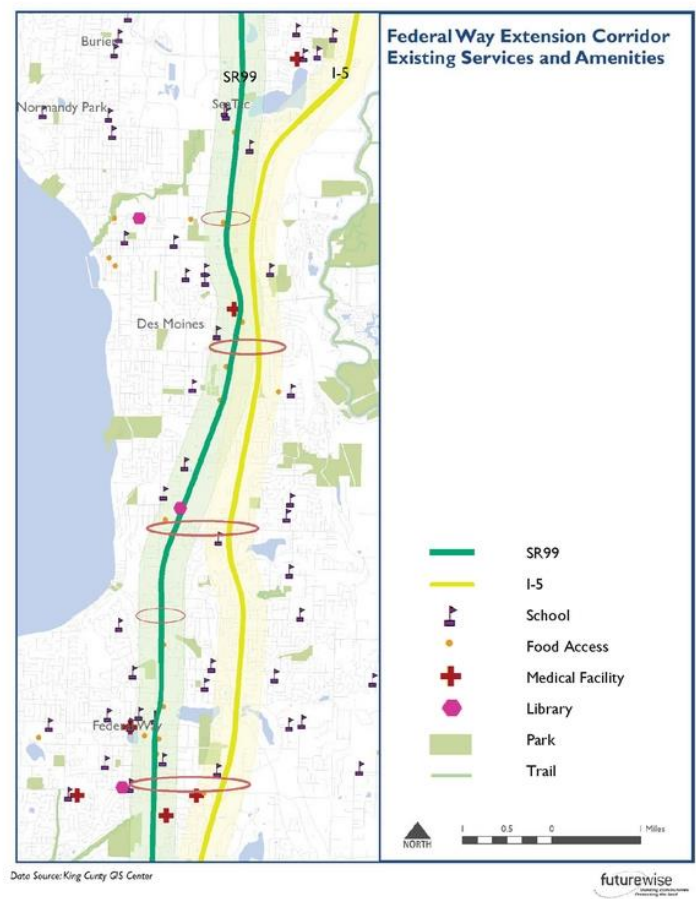
Figure 1-2
Summary of TOD Support by Geographic Location

Source: Sound Transit, *Federal Way Link Extension Transit Oriented Development Study* (April, 2014)

Futurewise
Sound Transit Federal Way DEIS Comment Letter
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No Comments

Attachment B
Existing Services and Amenities



Futurewise
Sound Transit Federal Way DEIS Comment Letter
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No Comments

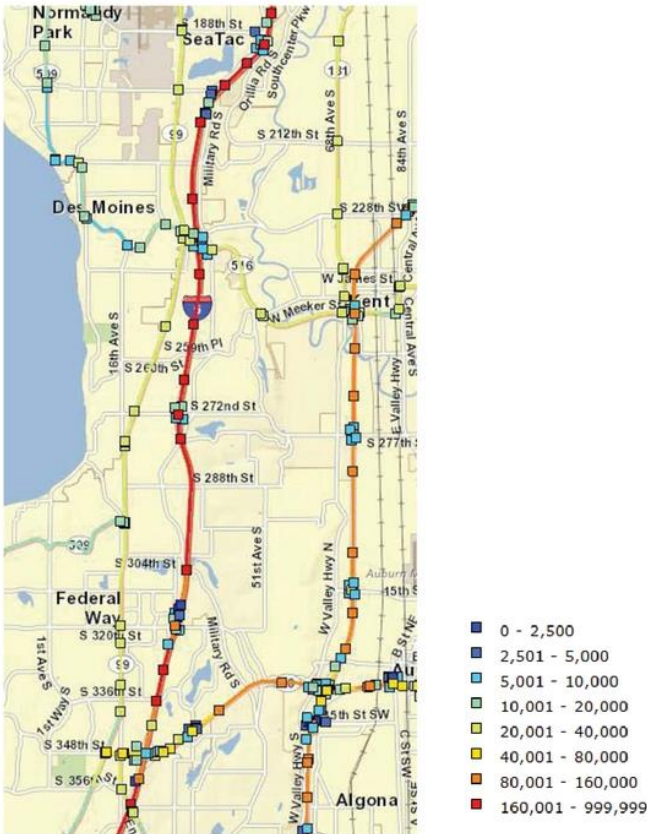
Attachment C
Cost Burdened Households



Source: HUD CHAS Data, 2011

No Comments

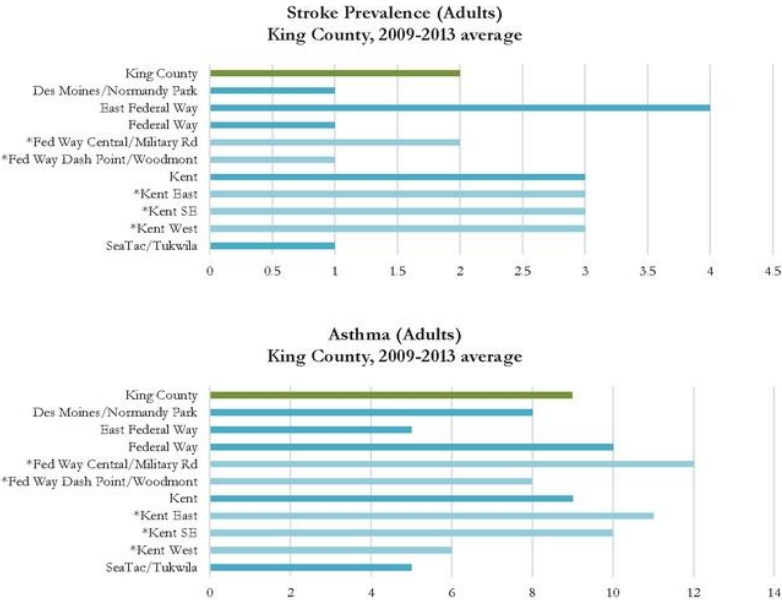
Attachment D
Traffic Counts



Source: Washington Department of Transportation

No Comments

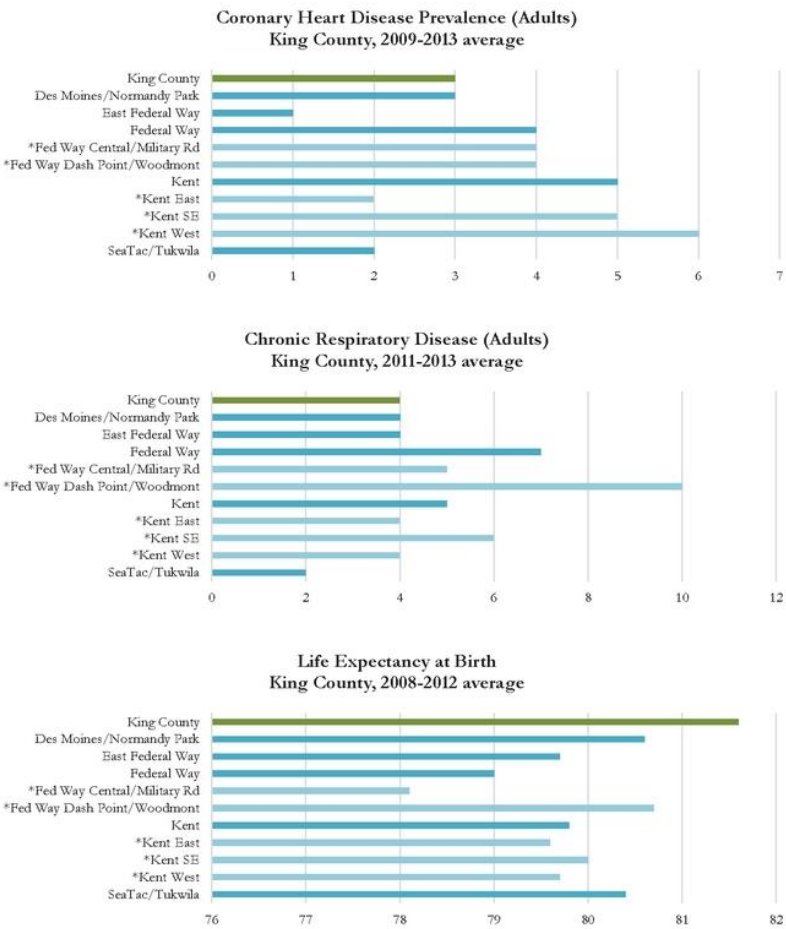
Attachment E
Health Outcomes in Select Cities and Health Reporting Areas



Source: King County Public Health

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Sound Transit Federal Way DEIS Comment Letter
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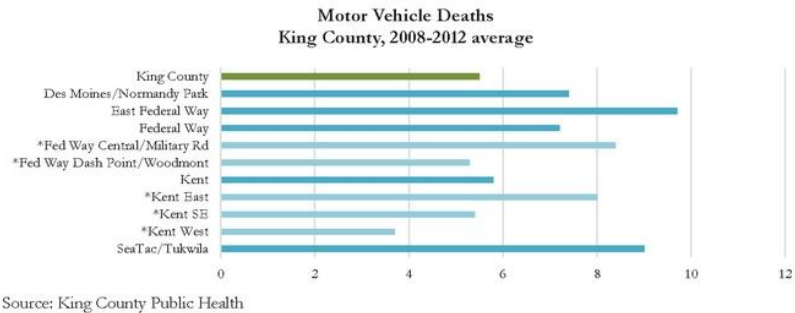
No Comments



Source: King County Public Health

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Sound Transit Federal Way DEIS Comment Letter
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No Comments



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