



West Seattle Link Extension

Federal Transit Administration
Record of Decision

April 2025

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Table of Contents

1	DECISION	1
1.1	Project Description	2
	Figure 1 Project Corridor	4
1.1.1	WSLE Alignment and Station Locations by Segment.....	4
1.2	Basis for the Decision.....	7
1.2.1	Local Planning	7
1.2.2	Environmental Review	7
1.2.3	Public Involvement.....	8
2	ALTERNATIVES CONSIDERED IN THE FINAL EIS	8
2.1	No-Build Alternative.....	8
2.2	Build Alternatives.....	9
2.2.1	SODO Segment.....	9
2.2.2	Duwamish Segment.....	9
2.2.3	Delridge Segment.....	9
2.2.4	West Seattle Junction Segment.....	9
2.2.5	Environmentally Preferred Alternative	10
3	MEASURES TO MINIMIZE HARM AND ENVIRONMENTAL COMMITMENTS	10
4	MONITORING AND ENFORCEMENT	11
5	FINAL EIS COMMENTS	11
6	DETERMINATION AND FINDINGS.....	13
6.1	Executive Order 13175 Consultation and Coordination with Indian Tribes	13
6.2	Executive Order 12372 Intergovernmental Review of Federal Programs and 23 United States Code 139 Coordination Requirements.....	13
6.3	Clean Air Act	14
6.4	Clean Water Act Section 404	14
6.5	Clean Water Act Sections 401 and 402.....	14
6.6	Coastal Zone Management Act.....	15
6.7	Endangered Species Act.....	15
6.8	Magnuson-Stevens Fisheries Conservation and Management Act.....	16
6.9	Migratory Bird Treaty Act.....	17
6.10	Executive Order 14148 (Initial Rescissions of Harmful Executive Orders and Actions) and Executive Order 14173 (Ending Illegal Discrimination and Restoring Merit-Based Opportunity)	17
6.11	Section 106 of the National Historic Preservation Act.....	17
6.12	Section 4(f) of the United States Department of Transportation Act	18
6.13	National Environmental Policy Act	19

7	REFERENCES	21
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Figures

Figure 1	West Seattle Link Extension Project Corridor.....	4
Figure 2	West Seattle Link Extension.....	6

Tables

Table 1	Summary of Effect Determinations for the WSLE Project	16
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Appendices

A	Alternatives Considered in the Final EIS
B	Mitigation Plan
C	Comments Received on the Final EIS
D	Section 106 Programmatic Agreement

Acronyms and Abbreviations

BA	Biological Assessment
BMP	best management practice
CFR	Code of Federal Regulations
Corps	United States Army Corps of Engineers
DOT	United States Department of Transportation
Ecology	Washington State Department of Ecology
EFH	essential fish habitat
EIS	environmental impact statement
EO	Executive Order
EPA	United States Environmental Protection Agency
ESA	Endangered Species Act
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
IDP	inadvertent discovery plan
LRV	light rail vehicle
MBTA	Migratory Bird Treaty Act
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
OMF	operations and maintenance facility
OMF Central	Operations and Maintenance Facility Central
PM	particulate matter
Project	West Seattle Link Extension Project
PSCAA	Puget Sound Clean Air Agency
ROD	Record of Decision

SEPA	State Environmental Policy Act
SHPO	State Historic Preservation Officer
Sound Transit	Central Puget Sound Regional Transit Authority
Sound Transit 3	Sound Transit 3: The Regional Transit System Plan for Central Puget Sound
U.S.C.	United States Code
WSDOT	Washington State Department of Transportation

1 DECISION

The Federal Transit Administration (FTA), pursuant to 23 Code of Federal Regulations (CFR) § 771.127, issues this Record of Decision (ROD) finding that the requirements of the National Environmental Policy Act (NEPA) have been satisfied for the construction and operation of the West Seattle Link Extension (WSLE) Project (Project) by the Central Puget Sound Regional Transit Authority (Sound Transit). This ROD also contains findings on other environmentally related federal statutory requirements.

This ROD is based on FTA's close review and independent assessment of Sound Transit's planning and environmental process for developing project alternatives and evaluating their effects. The following cooperating and participating agencies were engaged as part of the environmental review process:

Cooperating Agencies

- U.S. Army Corps of Engineers (Corps)
- U.S. Coast Guard
- U.S. Postal Service
- Port of Seattle
- City of Seattle

Participating Tribes and Agencies

- Confederated Tribes and Bands of the Yakama Nation
- Muckleshoot Indian Tribe
- Snoqualmie Indian Tribe
- Stillaguamish Tribe of Indians of Washington
- Suquamish Indian Tribe of the Port Madison Reservation
- Tulalip Tribes of Washington
- Bureau of Indian Affairs
- Federal Highway Administration
- Federal Railroad Administration
- U.S. Environmental Protection Agency
- Washington State Department of Archaeology and Historic Preservation
- Washington State Department of Ecology (Ecology)
- Washington Department of Natural Resources
- Washington State Recreation and Conservation Office
- King County
- Puget Sound Regional Council
- Northwest Seaport Alliance

Sound Transit and FTA published the West Seattle and Ballard Link Extensions Draft Environmental Impact Statement (EIS) under NEPA and the Washington State Environmental Policy Act (SEPA) in January 2022. The Draft EIS published for the WSLE in January 2022 evaluated both the WSLE and the Ballard Link Extension (BLE) together. The projects were evaluated together in the Draft EIS because of their location, schedule, and review efficiencies for partner agencies.

In July 2022, the Sound Transit Board directed that further studies be prepared for the BLE, evaluating additional station options and other refinements (Motion M2022-57). Some of these project options and refinements require additional conceptual engineering and environmental

review. As a result, environmental review for the two extensions is no longer on the same schedule. As described in the Draft EIS, the two extensions will operate as separate lines, and the extensions are stand-alone projects with independent utility. Rather than delay completion of the environmental review process for the WSLE while additional review is conducted for the BLE, Sound Transit and FTA decided to complete environmental review for each extension separately. The West Seattle Link Extension Final EIS, which addresses the WSLE only, was published by Sound Transit and FTA on September 20, 2024, and led to the determinations and environmental mitigation commitments included in this ROD (see Appendix B, Mitigation Plan).

This ROD summarizes the key elements of the Project; the factors and process that led to its development; the alternatives that FTA considered; the various opportunities to comment on project design and environmental review documents; agency comments on the Final EIS and responses (see Section 4.1, Final EIS Comments and Appendix C, Comments Received on the Final EIS); the basis for FTA's decision; and the environmental mitigation commitments (see Section 3, Measures to Minimize Harm and Environmental Commitments and Appendix B, Mitigation Plan) the Project requires. The ROD does not replace any of the information or descriptions in the environmental review documents.

Based on its consideration of the environmental review documents, FTA finds that Sound Transit has met all applicable requirements for the WSLE Project. FTA further finds that this ROD is complete and supports the determination that all NEPA requirements have been met. To mitigate the Project impacts, Sound Transit will implement, monitor, and report on the list of environmental commitments in Appendix B, Mitigation Plan.

1.1 Project Description

The WSLE Project is a 4.1-mile corridor in the City of Seattle in King County, Washington, the most densely populated county of the Puget Sound region (Figure 1). The WSLE would include stations at SODO, Delridge, Avalon, and Alaska Junction. The project is part of the Sound Transit 3 Plan of regional transit system investments, funding for which was approved by voters in the region in 2016. The Project would provide fast, frequent, and reliable light rail in Seattle and connect dense residential and job centers throughout the Puget Sound region. The Project will also help implement the Puget Sound Regional Council VISION 2050 (PSRC 2020) and the Sound Transit Regional Transit Long Range Plan (Sound Transit 2014).

The purpose of the WSLE is to expand the Sound Transit Link light rail system from SODO to West Seattle, to make appropriate community investments to improve mobility, and to increase capacity and connectivity for regional connections in order to achieve the following:

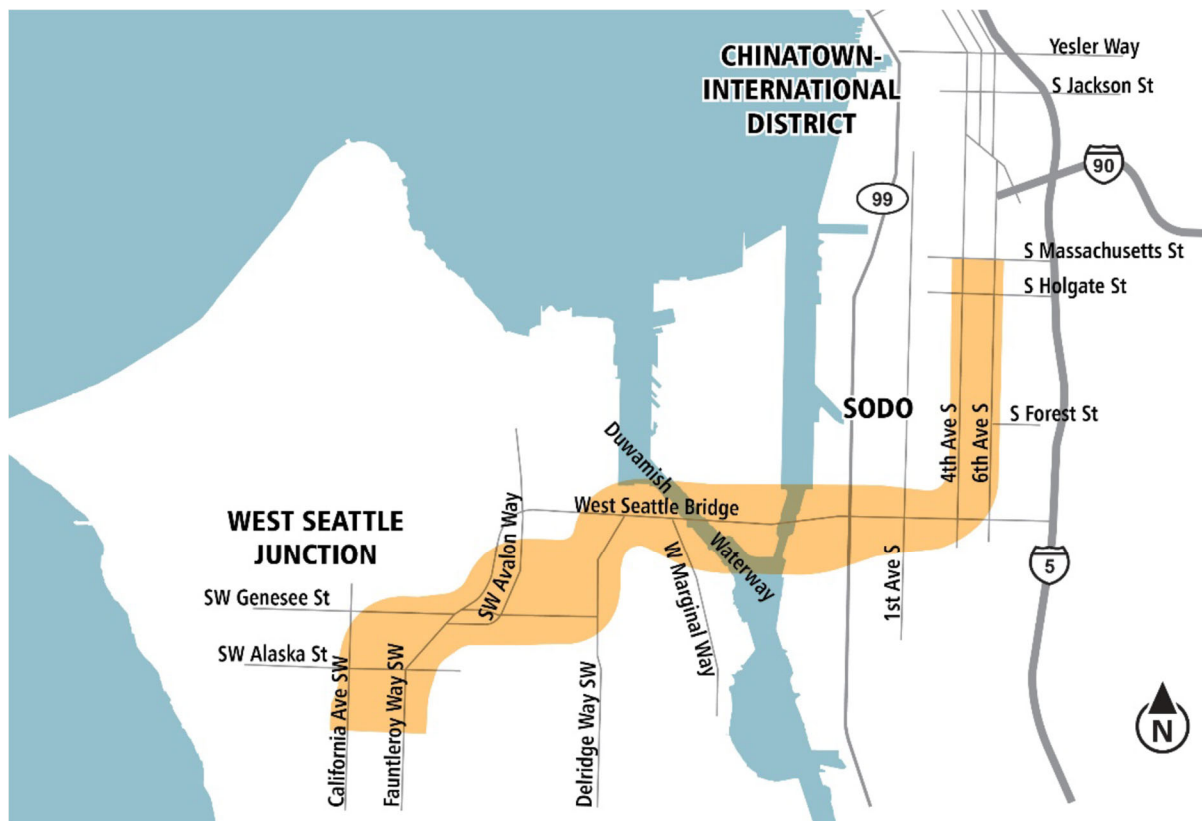
- Provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan
- Improve regional mobility by increasing connectivity and capacity to Downtown Seattle to meet the projected transit demand
- Connect regional centers as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's Regional Transit Long-Range Plan
- Implement a system that is technically and financially feasible to build, operate, and maintain

- Expand mobility for the corridor and the region's residents, which include transit-dependent people, low-income people, and communities of color
- Encourage equitable and sustainable urban growth in station areas through support of transit-oriented development and multi-modal integration in a manner that is consistent with local land use plans and policies, including Sound Transit's Equitable Transit Oriented Development Policy and Sustainability Plan
- Encourage convenient and safe non-motorized access to stations, such as bicycle and pedestrian connections, consistent with Sound Transit's System Access Policy
- Preserve and promote a healthy environment and economy by minimizing adverse impacts on the natural, built, and social environments through sustainable practices

The Project is needed because:

- When measured using national standards, existing transit routes between Downtown Seattle and West Seattle currently operate with poor reliability. Roadway congestion in the project corridor will continue to degrade transit performance and reliability as the city is expected to add about 287,000 people and about 214,000 jobs between 2018 and 2050 (Puget Sound Regional Council 2023).
- Increased ridership from regional population and employment growth will increase operational frequency in the existing Downtown Seattle Transit Tunnel, requiring additional transit capacity.
- Puget Sound Regional Council (the regional metropolitan planning organization) and local plans call for high-capacity transit in the corridor consistent with VISION 2050 (Puget Sound Regional Council 2020) and the Regional Transit Long-Range Plan.
- The region's people and communities, including transit-dependent people, low-income people, and communities of color, need long-term regional mobility and multi-modal connectivity as called for in the Washington State Growth Management Act (Revised Code of Washington 36.70A.108).
- Regional and local plans call for increased residential and/or employment density at and around high-capacity transit stations, and increased options for multi-modal access. VISION 2050 has a goal for 65 percent of the region's population growth and 75 percent of the region's employment growth to occur in regional growth centers and within walking distance of transit. Environmental and sustainability goals of the state and region, as established in Washington state law and embodied in Puget Sound Regional Council's VISION 2050 (2020) and 2022-2050 Regional Transportation Plan (2022), include reducing greenhouse gas emissions by prioritizing transportation investments that decrease vehicle miles traveled.

Figure 1 Project Corridor



1.1.1 WSLE Alignment and Station Locations by Segment

The project alternatives were analyzed in four segments: SODO, Duwamish, Delridge, and West Seattle Junction. The Sound Transit Board selected the following alternatives as the project to be built, which is the project approved in this ROD (Figure 2):

- At-Grade Lander Access Station Option (SODO-1c)
- South Crossing Alternative (DUW-1a)
- Andover Street Station Lower Height South Alignment Option (DEL-6b)
- Medium Tunnel 41st Avenue Station West Entrance Station Option (WSJ-5b)

This alternative was identified in the Final EIS as the Preferred Alternative. The Final EIS describes the Preferred Alternative's alignment, profile, station locations, and other project components.

1.1.1.1 SODO Segment

The project would begin north of the existing SODO Station and travel at-grade west of and parallel to the existing Link light rail line in the SODO Busway. The height of the guideway would range between a retained-cut and approximately 20 feet high and would mostly be at-grade. The new SODO Station on the WSLE would be at-grade, immediately west of the existing SODO Station, north of South Lander Street. Station platforms would be side platforms, one of which would be shared between the future northbound connection of the WSLE into the existing

downtown tunnel and existing southbound platform on the existing light rail line to SeaTac. The station has a staggered station configuration, with the southbound platform shifted slightly north.

1.1.1.2 Duwamish Segment

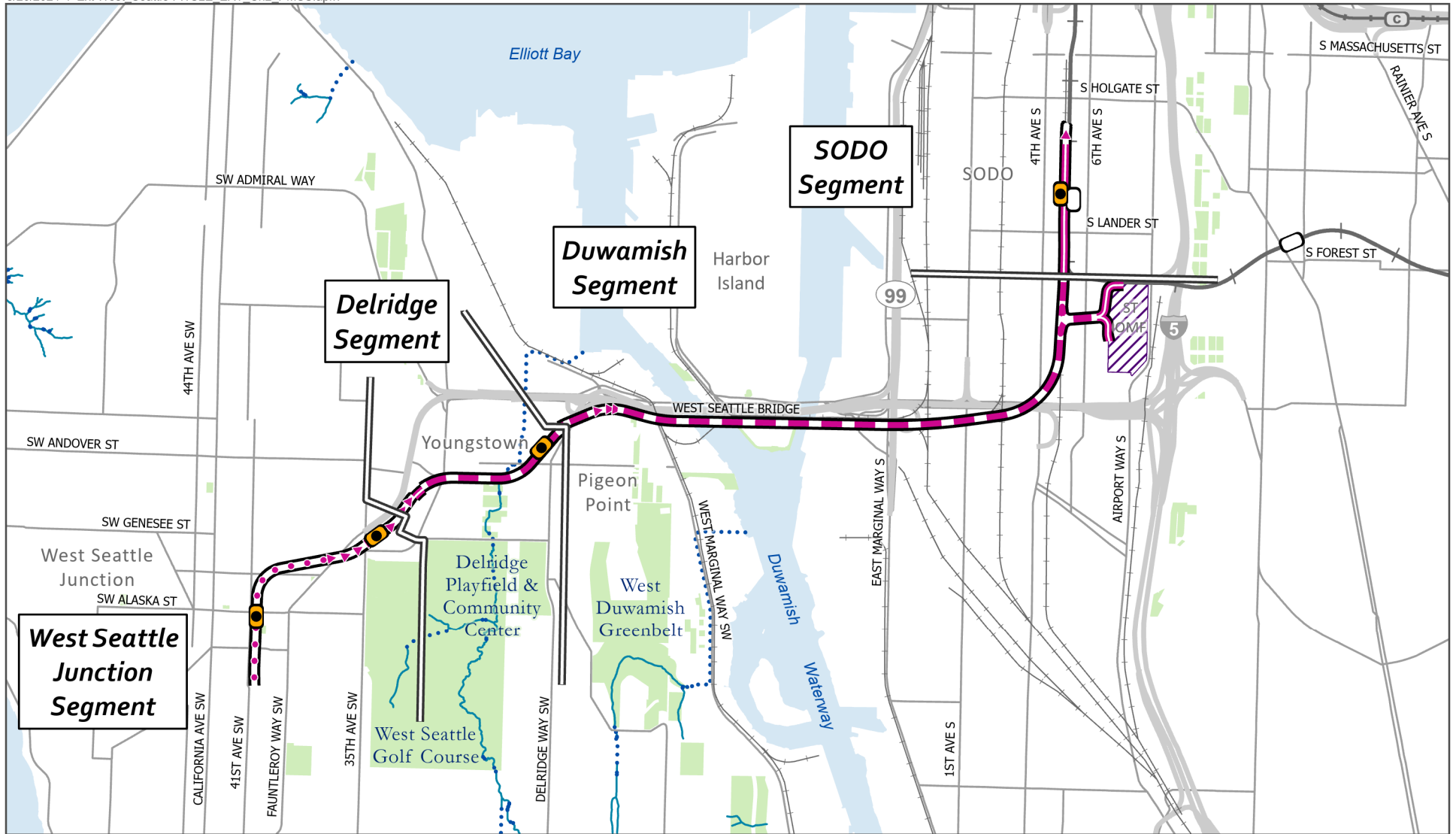
From the SODO Segment, WSLE would continue south from South Forest Street along the west side of the existing light rail line on an elevated guideway, past the Operations and Maintenance Facility Central before heading southwest to cross over to the south side of the Spokane Street Bridge and the West Seattle Bridge. The alignment would continue west and to the south side of the West Seattle Bridge, crossing over the East Waterway, Harbor Island, and the West Waterway on a fixed, light-rail-only bridge. The bridge over the West Waterway would have a clearance of approximately 140 feet over the navigation channel. West of the Duwamish Waterway crossing, the alternative would cross the northern edge of Pigeon Point before turning southwest on an elevated guideway crossing Delridge Way Southwest. A connection to the Operations and Maintenance Facility Central would be provided from tracks between South Forest Street and South Spokane Street. The northbound and southbound access tracks would be parallel to each other and would span over the BNSF Railway tracks and 6th Avenue South, then transition to at-grade to enter the operations and maintenance facility.

1.1.1.3 Delridge Segment

Continuing on an elevated guideway on the west side of Delridge Way, the alignment would travel west along the north side of Southwest Yancy Street and cross Southwest Avalon Way in the vicinity of Southwest Yancy Street. The alignment would cross 32nd Avenue Southwest at-grade, resulting in the closure of a portion of 32nd Avenue Southwest and the construction of cul-de-sacs on the street to the north and south. The alignment would continue south along the east side of the West Seattle Bridge connection to Fauntleroy Way Southwest. The station would be elevated, north of southwest Andover Street and west of Delridge Way Southwest, in a northeast-southwest orientation. This design option includes roadway improvements at the intersection of Delridge Way Southwest and 23rd Avenue Southwest to allow vehicle access and pedestrian crossings into the station area and Nucor Steel. Southwest Charlestown Street would be reconfigured west of Delridge Way Southwest and north of Southwest Andover Street to provide a dedicated circulation pathway for buses separate from freight and general purpose passenger vehicles.

1.1.1.4 West Seattle Junction Segment

Continuing west in a retained cut south of Southwest Yancy Street, the alignment follows the east side of the West Seattle Bridge connection to Fauntleroy Way Southwest. Southwest Genesee Street would be permanently closed approaching 35th Avenue Southwest. The alignment enters a tunnel at Southwest Genesee Street and 37th Avenue Southwest and curves southwest between 37th Avenue Southwest and 41st Avenue Southwest. It terminates at Southwest Hudson Street, with tail tracks under 41st Avenue Southwest. The Avalon Station would be in a lidded retained cut south of Southwest Genesee Street, beneath 35th Avenue Southwest. Station entrances would be on either side of 35th Avenue Southwest. The Alaska Junction Station would be in a tunnel beneath 41st Avenue Southwest and Southwest Alaska Street, with entrances on either side of Southwest Alaska Street.



Source: City of Seattle, King County (2023).

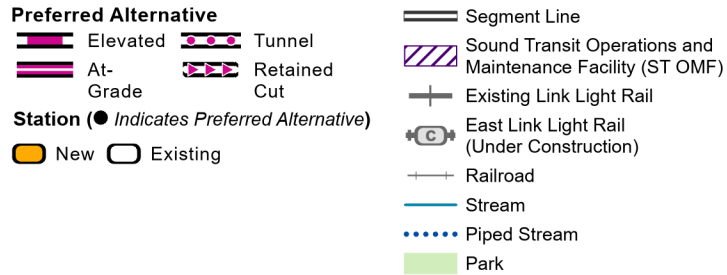


Figure 2
West Seattle Link Extension Project

1.2 Basis for the Decision

1.2.1 Local Planning

Regional and local agencies have been planning for high-capacity transit in the West Seattle Link Extension corridor for over 30 years. The transportation mode and corridor served by the project was identified through the multi-year planning process for Sound Transit's *Regional Transit Long-Range Plan* and Sound Transit 3. The *Regional Transit Long-Range Plan* represents Sound Transit's goals, policies, and strategies to guide the long-term development of the high-capacity transit system. It is based on years of intensive planning, environmental analysis, and public outreach. It is intended to guide how the Sound Transit system can best address the region's mobility needs and support growth management objectives. Sound Transit periodically updates the *Regional Transit Long-Range Plan* and used the updated 2014 plan as the basis for developing the current phase of high-capacity transit system investments documented in Sound Transit 3.

The City of Seattle has been coordinating with Sound Transit and planning for an expanded light rail system to support anticipated economic and population growth. The City has been planning for the expansion of high-capacity transit and studying potential land use changes in areas where high-capacity transit improvements are anticipated. Sound Transit's *South King County High-Capacity Transit Corridor Study* evaluated several candidate corridors in central and south King County, including West Seattle, for high-capacity transit improvements. Three high-capacity transit improvement options carried into the final study phase included extending light rail transit to the Alaska Junction area of West Seattle, and a fourth option would extend bus rapid transit to Alaska Junction. The South King County study did not recommend an alignment but did forecast that light rail transit ridership would be higher than bus rapid transit ridership. This study also informed the definition of the representative project included in the 2014 *Regional Transit Long-Range Plan* and in Sound Transit 3.

1.2.2 Environmental Review

The WSLE is an element of the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The representative project in the Sound Transit 3 Plan identified the mode as light rail, the general project corridor, and the station areas to be served. To identify alternatives to study in the EIS, Sound Transit completed an Alternatives Development process that included a three-level screening process. The Alternatives Development process began with early scoping under SEPA in February 2018. Sound Transit published an early scoping notice in the SEPA register on February 2, 2018, which initiated early scoping and started a 30-day comment period. During early scoping, Sound Transit requested comments on the preliminary purpose and need statement, potential refinements to the Sound Transit 3 Representative Project, and potential community benefits and impacts.

Based on feedback received during early scoping, Sound Transit developed an initial set of alternatives. Sound Transit then conducted a three-level screening process (Level 1, Level 2, and Level 3) that analyzed and compared the alternatives using evaluation criteria developed from the project's preliminary purpose and need. After each screening analysis was complete, the results were presented to the Stakeholder Advisory Group. The Stakeholder Advisory Group recommended alternatives to carry forward to the next level of screening to the Elected Leadership Group, which then made recommendations on which alternatives to carry forward to the next screening level. See Appendix M of the Final EIS, Summary of Alternatives Development and Initial Assessment Process, for a map of the Representative Project, the

alternatives for each level of screening, and why some alternatives were recommended to not be carried forward.

Scoping for this EIS was conducted under NEPA and SEPA. The scoping process began with a Notice of Intent to prepare an EIS in the *Federal Register* on February 12, 2019 (84 *Federal Register* 3541), and a Determination of Significance in the SEPA Register on February 15, 2019. These notices initiated formal scoping and started a required 30-day comment period through March 18, 2019. The FTA and Sound Transit extended this comment period until April 2, 2019, based on requests from the public and the City of Seattle. Appendix F, Public Involvement, Tribal Consultation, and Agency Coordination, of the Final EIS provides additional information on the scoping process and comments received.

Following the public scoping period, the Sound Transit Board of Directors reviewed the comments received and the alternatives evaluated in the three-level screening process (see Appendix M for details). In May 2019, the Board approved Motion M2019-51, which identified preferred alternatives and other alternatives to study in the Draft EIS. The Board also directed Sound Transit project staff to conduct an initial assessment of additional alternatives suggested during the scoping period to establish whether further detailed study in the Draft EIS was appropriate. In October 2019, the Board approved Motion M2019-104, which identified additional alternatives to study in the Draft EIS.

1.2.3 Public Involvement

Throughout the 7 years of alternatives development/scoping and environmental review processes, Sound Transit provided frequent opportunities for interested members of the public, agencies, and Tribes to engage, share concerns, and discuss specific project details with Sound Transit staff. Sound Transit's public involvement activities to date have included public open houses and workshops, community event participation, stakeholder briefings, email and website updates, web and print advertisements, mailers, and meetings with groups of interested businesses, residents, affected property owners, and others. Appendix F, Public Involvement, Tribal Consultation, and Agency Coordination, of the Final EIS provides a comprehensive summary of public engagement opportunities for the Project.

2 ALTERNATIVES CONSIDERED IN THE FINAL EIS

The Final EIS analyzed the Preferred Alternative, numerous build alternatives within each segment, and a No-Build Alternative, as described below.

2.1 No-Build Alternative

The No Build Alternative includes the transportation system and environment as they would exist in 2042 without the proposed project, and it provides a baseline condition for comparing impacts of the Build Alternatives and design options. The year 2042 is used as the analysis year because it aligns with full buildout of the light rail capital projects included in the Sound Transit 3 Plan under the target schedule. The No Build Alternative includes projects, funding packages, and proposals in the central Puget Sound region that are planned to occur with or without the WSLE. No Build Alternative improvements include transit, roadway, and other transportation actions by state, regional, and local agencies that are currently funded or committed, and those that are likely to be implemented based on approved and committed funding. Appendix N.1, Transportation Technical Report, of the Final EIS describes the major projects assumed in the No Build Alternative by jurisdiction.

2.2 Build Alternatives

The Final EIS analyzes 25 different alternatives within four segments. It also summarizes other alternatives and explains why they were not carried forward for analysis. Figure A-1 in Appendix A depicts all the alternatives evaluated in the Final EIS.

2.2.1 SODO Segment

The SODO Segment includes the area between approximately S Massachusetts Street and S Forest Street in the SODO neighborhood. There is an existing SODO light rail station, and a new SODO station is the only station proposed in this segment. The new SODO Station would provide a transfer point to/from the 1 Line (future Ballard to Tacoma light rail line) via the existing SODO Station, and the two stations would therefore function as one SODO Station.

The Final EIS analyzed four alternatives in the SODO segment. Three, including the Preferred Alternative, have an at-grade SODO station and would reconstruct a portion of Lander Street as an overpass over the existing and future light rail tracks. One alternative has an elevated SODO station and would not include construction of S Lander Street as an overpass. Two of the alternatives require relocating the existing SODO station to the south. Figure A-2 in Appendix A depicts the alternatives evaluated for the SODO segment in the Final EIS.

2.2.2 Duwamish Segment

The Duwamish Segment includes the area between S Forest Street in the SODO neighborhood and the intersection of SW Charlestown Street and Delridge Way SW in the North Delridge neighborhood. This segment does not include a station but does include a connection to the existing Operations and Maintenance Facility Central. The Final EIS evaluated three alternatives in the Duwamish Segment. All alternatives include a light rail only fixed bridge over the Duwamish Waterway adjacent to the existing West Seattle Bridge. The Preferred Alternative is just south of the West Seattle Bridge. One alternative is farther south from the West Seattle Bridge and one alternative is on the north side of the West Seattle Bridge. Figure A-3 in Appendix A depicts the alternatives evaluated for the Duwamish segment in the Final EIS.

2.2.3 Delridge Segment

The Delridge Segment includes the area between SW Charlestown Street and a boundary line between 31st Avenue SW and Fauntleroy Way SW. The Final EIS evaluated ten alternatives in the Delridge Segment. All of the alternatives are elevated with an elevated Delridge Station. Some alternatives transition to retained cut at the western edge of the segment if connecting to tunnel alternatives in the West Seattle Junction segment. Two of the alternatives, including the Preferred Alternative, generally follow the SW Yancy Street corridor and two follow SW Andover Street corridor. These four alternatives have a Delridge Station north of southwest Andover Street and west of Delridge Way SW in a northeast-southwest orientation. Six of the alternatives continue farther south along Delridge Way SW before turning west and following along SW Genesee Street. Of these, four have a Delridge Station between Delridge Way SW and 26th Avenue SW, south of SW Dakota Street, and oriented southwest-northeast. Two have a Delridge Station in the middle of Delridge Way SW, north of SW Dakota Street. Figure A-4 in Appendix A depicts the alternatives evaluated for the Delridge segment in the Final EIS.

2.2.4 West Seattle Junction Segment

The West Seattle Junction Segment includes the area generally west of 31st Avenue SW, between SW Charleston Street and SW Hudson Street. Most of the eight alternatives would have two stations: Avalon and Alaska Junction. One alternative would have only the Alaska

Junction Station. Two of the alternatives would be elevated, with both stations elevated. Six of the alternatives would be in a tunnel, with the Avalon Station retained cut and the Alaska Junction Station in a tunnel. The Avalon Station would generally be near SW Genesee Street and 35th Avenue SW for all alternatives that include an Avalon Station. Six of the tunnel Alaska Junction Station alternatives, including the Preferred Alternative, would generally be under 41st Avenue SW near SW Alaska Street. One tunnel alternative has the Alaska Junction Station under 42nd Avenue SW at SW Alaska Street. The two elevated station alternatives would be either between 41st Avenue Southwest and 42nd Avenue SW, south of SW Alaska Street or southeast of Fauntleroy Way SW straddling SW Alaska Street. Figure A-5 in Appendix A depicts the alternatives evaluated for the West Seattle Junction segment in the Final EIS.

2.2.5 Environmentally Preferred Alternative

All of the build alternatives in the Final EIS advance environmental and sustainability goals of the State and region by supporting the expansion of regional light rail, which is expected to reduce vehicle miles traveled and greenhouse gas emissions long term. In addition, the build alternatives improve availability and reliability of public transportation in the corridor and throughout the region. They also support local and regional land use plans that identify the need for high-capacity transit options to help reduce dependency on single occupancy vehicles.

Pursuant to 40 CFR § 1505.2, FTA determines that all the build alternatives are environmentally preferable over the No Build Alternative.

The Final EIS discusses how impacts vary among the build alternatives. Chapter 6, Evaluation of Alternatives, of the Final EIS evaluates how the Build Alternatives for the WSLE would meet the project's purpose and need and summarizes the benefits and impacts of each alternative and option. While there are trade-offs, FTA also determines that none of the build alternatives are materially more environmentally preferable than another. After considering the analysis in the Final EIS, comments on the Draft EIS documents from the public and affected jurisdictions, and other factors, the Sound Transit Board selected the Preferred Alternative as the Project to be built. FTA concurs with Sound Transit's decision.

3 MEASURES TO MINIMIZE HARM AND ENVIRONMENTAL COMMITMENTS

Sound Transit has designed the Project to avoid and minimize harm to the natural and built environment. Appendix I, Mitigation Plan, of the Final EIS identifies environmental commitments that Sound Transit will implement to mitigate impacts. These commitments are incorporated herein and included in Appendix B of this ROD. Sound Transit will implement, monitor, and report on these environmental commitments identified quarterly, unless it receives concurrence from FTA to do otherwise. In addition, Sound Transit will meet the conditions of all applicable state, federal, and local permits and approvals, and employ best management practices (BMPs).

The environmental mitigation commitments described in Appendix B are conditions of this WSLE ROD and are incorporated into the definition of the Project. Where appropriate, Sound Transit will incorporate environmental commitments into its contracting documents that may be awarded for final design and construction of the Project. These environmental commitments may be adopted by other federal permitting agencies. FTA considers these commitments to be material conditions of this ROD and will incorporate them in any future funding agreement that it may award Sound

Transit for the construction of the WSLE. FTA finds that with the accomplishment of these environmental commitments, Sound Transit will have taken all reasonable, prudent, and feasible means to avoid or minimize environmental harm from this Project.

4 MONITORING AND ENFORCEMENT

To ensure compliance with required mitigation and to assist with FTA oversight, Sound Transit will use its mitigation monitoring program to track, monitor, and report the status of the environmental commitments identified in the ROD to FTA quarterly for the Project. Upon FTA approval, and in coordination with agencies with jurisdictions, the environmental commitments, may be modified during the final design, permitting, and construction processes.

5 FINAL EIS COMMENTS

As defined by FTA's Office of Environmental Policy and Programs' environmental standard operating procedures (SOP) 11, issued March 2019, no comment period is required following the publication of a Final EIS; however, a 30-day waiting period is required between the date of the Federal Register FEIS NOA and signature date of the ROD (40 CFR 1506.10(b)(2), 23 CFR 771.125 and 771.127). FTA may receive comments during this period and may consider any substantive comments received when developing the basis of decision for the ROD. Substantive comments are comments that raise specific issues or concerns regarding the project or the study process, suggest new alternatives, or question or raise concern over new impacts not previously addressed in the EIS.

After issuance of the Final EIS, FTA received public comments prior to issuing the ROD. FTA and Sound Transit received 160 comment letters, of which 135 were substantive, on the Final EIS for the WSLE. Most comment letters were from individuals. Five letters were submitted from businesses, six from organizations, and four from agencies. FTA reviewed comments received prior to the issuance of the ROD to the extent practicable. All comment letters received prior to issuance of this record of decision, and responses to substantive comments received before April 15, 2025, are included in Appendix C.

Many individuals indicated support for the Andover Street Station Lower Height No Avalon Station Tunnel Connection Alternative (DEL-7) and the No Avalon Station Tunnel Alternative (WSJ-6), which does not include an Avalon Station. Commenters noted their preference due to the lower cost and suggested that there is similar ridership without Avalon Station. Reasons for support also included fewer displacements, less construction impacts, fewer intersections impacted, faster travel times, and reduced vibration impacts. Commenters thought the Avalon Station was in an area too close to the West Seattle Bridge where there could be pedestrian and traffic safety risk. Many of these comments suggested moving the Alternative DEL-7 tunnel portal to the east side of Southwest Avalon Way and Southwest Yancy Street and suggested turning the Bank of America property on Southwest Alaska Street into a transit hub for the Alaska Junction Station.

Many individuals were opposed to the WSLE and supported the No Build Alternative, due to the increased cost of the project since the ST3 Plan. Some individuals opposed to the project also mentioned a desire to avoid impacts to West Seattle neighborhoods and questioned the need

for light rail given the existing bus service. Other individuals expressed support for the project and requested that the project move forward without further delay.

Organizations that submitted comment letters included Transitional Resources, a behavioral health non-profit in Delridge, that submitted a comment letter supporting alternatives DEL-7 and WSJ-6. Rethink the Link, a group of “West Seattle residents concerned about Sound Transit’s proposed light rail extension,” submitted two comment letters opposed to the project due to neighborhood impacts such as acquisitions, loss of jobs, and ecosystem impacts. Rethink the Link attached an assessment of the project titled “West Seattle Light Rail Environmental Impact Statement-Conclusion (EIS-C).” Smarter Transit, an organization with the mission “to support and advocate for accountable public transportation governance and investments,” was opposed to the WSLE due to low ridership, displacement, and environmental impacts. Smarter Transit is in favor of bus rapid transit instead of light rail. The Washington Policy Center, a “non-profit think tank that promotes sound public policy,” expressed opposition to the project due to a lack of a cost-benefit analysis and programmatic alternatives analysis in the Final EIS, forecast ridership, greenhouse gas increases, business displacements, and cost increases. West Seattle Bike Connections, a group advocating “for people traveling by bike in, to and from West Seattle,” highlighted specific areas of concern related to bicycle and pedestrian facility closures during construction and long term bicycle and pedestrian access.

Business letters included a letter from the Seattle Metropolitan Chamber of Commerce which stated support for the project. The West Seattle Junction Association wrote in support of the project and requested establishment of a mitigation fund to support their Business Improvement Area (BIA) because they noted that 38 businesses would be demolished for the station, which would decrease their annual budget. Pacific Iron and Metal noted support for Preferred Alternative SODO-1c. The SODO BIA expressed concern with the project and the impacts to the industrial sector represented by the SODO BIA. They have asked not to move forward with the project and to conduct a supplemental EIS. The SODO BIA also requested that Sound Transit and the City of Seattle enter into a Memorandum of Agreement with them which would include advisory groups, committees, coordination, and a mitigation fund. Blade Gallery commented in opposition of the project due to ridership experience, carbon generation, cost, displacements, and economic impacts.

Four agency letters were received, one from the United States Postal Service (USPS), one from the Environmental Protection Agency (EPA), one from the City of Seattle (the City), and one from the Port of Seattle (Port) and the Northwest Seaport Alliance (NWSA).

USPS requests that prior to the design phase of the project, issues related to construction impacts on USPS’s operations are addressed. USPS is concerned with the new overpass on South Lander Street, an access road to their garage from 4th Avenue South, and changes to 4th Avenue South and how these elements would impact their facility at 2460 4th Ave South.

EPA’s letter recommended additions to the ROD. They recommended that the ROD provide additional information related to superfund sites in the Duwamish Segment. EPA also recommended that the ROD include continued coordination with Tribes regarding impacts to treaty-protected fishing rights and access to Usual and Accustomed Areas. EPA requested a copy of the compensatory mitigation plan when submitted to the U.S. Army Corps of Engineers during the Clean Water Act Section 404 permitting process.

The City of Seattle's letter expressed support for the WSLE Preferred Alternative. The City noted they will continue to work with Sound Transit during permitting and that mitigation agreed to during permitting will be more specific than that identified in the Final EIS. The City described areas of continued collaboration with Sound Transit.

The Port and NWSA submitted one letter from both parties which included support for the Preferred Alternative in the Final EIS. They mentioned Sound Transit's need to develop a maintenance of traffic plan to manage impacts during construction and asked to be coordinated with on this plan. The letter requests displacements in the SODO area be minimized and businesses are relocated within the city's industrial areas to the extent feasible. The Port and NWSA also noted support for transit-oriented development and asked to be included in the redevelopment process.

6 DETERMINATION AND FINDINGS

6.1 Executive Order 13175 Consultation and Coordination with Indian Tribes

Under Executive Order 13175 and other Federal authorities, FTA conducted government-to-government consultation and coordination with the following Federally recognized Tribes:

- Confederated Tribes and Bands of the Yakama Nation
- Muckleshoot Indian Tribe
- Snoqualmie Indian Tribe
- Stillaguamish Tribe of Indians of Washington
- Suquamish Indian Tribe of the Port Madison Reservation
- Tulalip Tribes of Washington

Tribal comments and suggestions provided through the consultation process and in response to the Draft EIS have been addressed and incorporated into the Final EIS. Tribal coordination will continue as the Project moves forward.

FTA finds that the requirements of Executive Order 13175 have been met.

6.2 Executive Order 12372 Intergovernmental Review of Federal Programs and 23 United States Code 139 Coordination Requirements

Executive Order 12372 directs Federal agencies to consult with and solicit comments from State and local governments whose jurisdictions will be affected by a federal action. Similarly, 23 United States Code (U.S.C.) § 139 directs lead agencies to invite interested agencies and Tribes to comment on the purpose and need for the Project, the range of alternatives to be considered, and the Draft EIS. FTA accepted comments and offered briefings to agencies and Tribes during the scoping period, development of the 2022 Draft EIS, and preparation of the Final EIS. Several agencies and Tribes reviewed and commented on the Draft EIS documents. In the Final EIS, Appendix O, Draft EIS Comments and Responses, contains responses to all

public, agency, and Tribal comments received during the Draft EIS comment period related to the WSLE. Comments received on the Draft EIS related to the BLE, which is undergoing separate environmental review since the Draft EIS, will be responded to as part of that environmental process.

Section 1 of this ROD identifies the State and local agencies that accepted invitations to be Cooperating Agencies for the Project. Appendix F, Public Involvement, Tribal Consultation, and Agency Coordination, of the Final EIS, provides more details.

FTA finds that the requirements of Executive Order 12372 and 23 U.S.C. § 139 have been met.

6.3 Clean Air Act

Under the Clean Air Act, EPA has established National Ambient Air Quality Standards (NAAQS), which specify maximum allowable concentrations for certain criteria pollutants. Washington State and the Puget Sound Clean Air Agency have adopted these standards. Proposed transportation projects requiring Federal funding or approval must demonstrate compliance with EPA's Transportation Conformity Rule (40 CFR Part 93) to confirm the Project will not cause or contribute to any new violation of any NAAQS, increase the frequency or severity of any existing NAAQS violations, or delay timely attainment of the NAAQS.

The Project meets project-level air quality conformity in accordance with State and Federal regulations. Alternatives are located within attainment areas for particulate matter (PM_{2.5} and PM₁₀) and carbon monoxide standards, and carbon monoxide and PM hot-spot analyses are not required. In addition, a conformity determination under Federal regulations is not needed.

FTA finds that the requirements of the Clean Air Act have been met.

6.4 Clean Water Act Section 404

The Clean Water Act (33 U.S.C. § 1251 et seq.) establishes the basic structure for regulating discharges of pollutants (including dredged materials) into Waters of the United States and for regulating quality standards for surface waters. Section 404 of the act applies to the Project wetland and stream impacts and stormwater discharges.

Sound Transit will permanently impact up to 0.1 acres of wetlands under the authority of a Section 404 permit from the Corps. Other State and local permits may be required, and the Project will satisfy all permit conditions, including compensatory mitigation.

Accordingly, FTA finds that with the environmental mitigation commitments identified in Appendix B of this ROD, the Project meets the requirements of Section 404 of the Clean Water Act.

6.5 Clean Water Act Sections 401 and 402

Clean Water Act Sections 401 and 402 address discharges into water. Section 401 provides for EPA certification (delegated to Ecology) that a project's discharges to water or to wetlands will meet State water quality standards. Under Section 402, a discharge of domestic or industrial wastewater into surface water requires a National Pollutant Discharge Elimination System permit, including a General Construction Permit for applicable construction activities.

Stormwater management will meet the requirements of the 2019 Ecology Stormwater Management Manual for Western Washington¹. Sound Transit will also meet the stormwater management requirements of local jurisdictions.

Sound Transit will comply with water quality and flow control treatment requirements. Sound Transit shall obtain and comply with the requirements of a project-specific Construction Stormwater General Permit and will implement measures defined for the Project through a Stormwater Pollution Prevention Plan.

Sound Transit will treat all new and replaced pollution-generating impervious surfaces (PGIS) and look for opportunities to use pervious pavement, where practical, during final design. Some of these replaced surfaces are pollution-generating but currently do not receive treatment, because such treatment was not required when they were constructed. Adding treatment for these surfaces would result in additional reductions of pollutants, providing additional benefits to surface waters. Accordingly, FTA finds that with the mitigation measures identified in Appendix B of this ROD, the Project meets the requirements of Sections 401 and 402 of the Clean Water Act.

6.6 Coastal Zone Management Act

Within Washington's 15 coastal counties, projects with a federal nexus require Coastal Zone Management Act (16 U.S.C. §§ 1451–1462) consistency certification.

Sound Transit will coordinate with the Corps and Ecology to obtain a determination confirming that the Project is consistent and compliant with the Washington State Coastal Zone Management Program.

FTA finds that with Sound Transit's coordinating work with the Corps and Ecology, the Project meets the requirements of the Coastal Zone Management Act.

6.7 Endangered Species Act

The Endangered Species Act (ESA) (16 U.S.C. § 1531 et seq.) is intended to protect threatened and endangered species and the ecosystems on which they depend. Section 7 of ESA generally requires that any action authorized, approved, or funded by a federal agency is not likely to jeopardize the continued existence of any threatened or endangered species or adversely modify any designated critical habitat of such species. Federal lead agencies must consult with federal fish and wildlife conservation agencies to ensure their actions satisfy these requirements. Section 4.9, Ecosystems, and Appendix N.4, Ecosystems Technical Report, of the Final EIS provide additional information.

Sound Transit prepared a Biological Assessment (BA) that evaluated the Project's potential effects on ESA listed species. Table 2 is a summary of FTA's effect determinations based on the BA. FTA submitted the BA to the U.S. Fish and Wildlife Service and National Marine Fisheries Service (NMFS) on June 21, 2024. On October 8, 2024, NMFS issued a Biological Opinion that concurred with FTA's determination. NMFS concluded that the proposed action is not likely to jeopardize the continued existence of PS Chinook salmon, PS steelhead, Bocaccio,

¹ The light rail track/guideway is Non-Pollution Generating Impervious Surface (NPGIS) under Department of Ecology's 2019 municipal stormwater permit and manual and Pollution-Generating Impervious Surface (PGIS) under the 2024 permit and manual. However, the 2024 permit and manual are subject to a pending appeal before the Pollution Control Hearings Board.

or destroy or adversely modify their designated critical habitats. The Biological Opinion contains the following terms and conditions:

- To ensure that take is reduced to the maximum extent practicable, provide a monitoring report documenting that the extents of take described are not exceeded. This documentation must include:
 - Scale drawings that show the amount of new PGIS was not exceeded,
 - A description of measures used to minimize construction lighting on the water, and
 - A description of added stormwater treatment and the maintenance program needed to ensure its optimal function.
 - This report is due within 6 months of completion of construction.

In a letter dated January 6, 2025, the U.S. Fish and Wildlife Service concurred with FTA's determination that the proposed action may affect but is not likely to adversely affect the marbled murrelet, bulltrout, and designated bull trout critical habitat.

FTA finds that with the mitigation measures identified in Appendix B of this ROD and adherence to the terms and conditions listed above, the Project meets the requirements of ESA.

Table 1 Summary of Effect Determinations for the WSLE Project

Species or Critical Habitat	Federal Status	Effect Determinations
Bull trout	Threatened	Not likely to adversely affect
Bull trout critical habitat	Designated	Not likely to adversely affect
Marbled murrelet	Threatened	Not likely to adversely affect
Puget Sound Chinook salmon	Threatened	Likely to adversely affect
Puget Sound Chinook salmon critical habitat	Designated	Likely to adversely affect
Puget Sound steelhead	Threatened	Likely to adversely affect
Puget Sound steelhead critical habitat	Designated	Likely to adversely affect
Puget Sound/Georgia Strait bocaccio	Endangered	Likely to adversely affect
Puget Sound/Georgia Strait bocaccio critical habitat	Designated	Likely to adversely affect
Puget Sound/Georgia Strait yelloweye rockfish	Threatened	Likely to adversely affect
Southern Resident killer whale	Endangered	Not likely to adversely affect
Southern Resident killer whale critical habitat	Designated	Not likely to adversely affect

6.8 Magnuson-Stevens Fisheries Conservation and Management Act

The Magnuson-Stevens Fisheries Conservation and Management Act (16 U.S.C. § 1801 et seq.) directs agencies to identify and conserve habitat that is essential to federally managed fish species, defining “essential fish habitat” (EFH) as “those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity.”

The BA found and the FTA determined that the planned action may adversely affect EFH for Pacific salmon, Pacific groundfish, and coastal pelagic species. In their October 8, 2024, Biological Opinion, NMFS concurred with FTA's determination. NMFS concluded the avoidance and minimization measures that are integrated into the proposed action are those NMFS typically considers necessary to conserve EFH and had no EFH conservation recommendations

to provide. FTA finds that with the mitigation measures identified in Appendix B of this ROD, the Project meets the requirements of the Magnuson-Stevens Act.

6.9 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S.C. §§ 703–712) prohibits taking, killing, or possessing migratory birds. Sound Transit will establish Project schedule restrictions to have clearing activities occur outside the active bird nesting period, to the extent possible. If avoidance scheduling is infeasible, Sound Transit will work with qualified wildlife staff at the U.S. Department of Agriculture, Animal and Plant Health Inspection Services to conduct preconstruction surveys for nesting migratory birds in the corridor and help Sound Transit comply with the MBTA.

Accordingly, FTA finds that, with the minimization measures identified in Section 4.9, Ecosystems, and Appendix N.4, Ecosystems Technical Report, of the Final EIS, the Project meets the requirements of the MBTA.

6.10 Executive Order 14148 (Initial Rescissions of Harmful Executive Orders and Actions) and Executive Order 14173 (Ending Illegal Discrimination and Restoring Merit-Based Opportunity)

Executive Order 14148 (Initial Rescissions of Harmful Executive Orders and Actions, January 20, 2025) and Executive Order 14173 (Ending Illegal Discrimination and Restoring Merit-Based Opportunity, January 21, 2025) rescinded Executive Order 14096 (Revitalizing Our Nation's Commitment to Environmental Justice for All, April 21, 2023), Executive Order 13990 (Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, January 20, 2021), and Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, February 11, 1994).

The FEIS included analysis under the rescinded Executive Orders; however, consideration of subject matter mandated by the rescinded EOs is no longer required. Accordingly, the analysis under rescinded EOs does not inform the determination reached in this ROD.

6.11 Section 106 of the National Historic Preservation Act

The National Historic Preservation Act (NHPA) (54 U.S.C. § 10010 et seq.) establishes government policy and procedures regarding “historic properties,” which include districts, sites, buildings, structures, and objects that are listed in or eligible for listing on the National Register of Historic Places (NRHP). Section 106 of the NHPA requires federal agencies to consider the effects of their actions on historic properties.

Sound Transit reviewed published literature, historical records, and historic-period maps to gather information on specific locations and land uses during the ethnographic period reflecting Native American use of the area. It also conducted pedestrian surveys and subsurface probes and did not identify significant archaeological resources in the Project area. The study area generally has a very high probability for containing intact archaeological resources. FTA has consulted with the State Historic Preservation Officer (SHPO), Confederated Tribes and Bands of the Yakama Nation, Muckleshoot Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, and Tulalip Tribes of Washington on the Project.

Archaeological sites 45KI52 and 45KI1353 were discussed in the Final EIS but neither had been formally evaluated for inclusion in the National Register of Historic Places. The Final EIS noted that site 45KI52 was outside of the Area of Potential Effects (APE) but noted the “extent of the boundary and actual proximity of the site to either of the southern alignments is currently unknown.” Archaeological site 45KI1353, thought to be associated with 45KI52 is identified in the Final EIS as within the APE for the Project. The FEIS noted on page 4.16-16 that site 45KI1353 could be a precontact midden site with the potential to be directly impacted by Preferred Alternative DUW-1a and Option DUW-1b. During ongoing Tribal consultation to prepare the Programmatic Agreement for the project, FTA, in coordination with Sound Transit identified sites 45KI1353 and 45KI52 as part of a larger site area and defined a new site boundary that included but was not limited to both previously recorded site areas. Site records for the two sites were merged and became known only as site 45KI52. On November 18, 2024, FTA, in coordination with Sound Transit determined site 45KI52 eligible for listing in the National Register and determined that the project would have an adverse effect on the site. On November 20, 2024, SHPO concurred with these determinations.

FTA finds that the Project will have adverse effects to nine resources eligible for listing on the NRHP:

- Graybar Electric Company Building
- Pacific Forge Company/Bethlehem Steel Nut and Bolt Factory Historic District
- A.M. Castle and Company
- Alaskan Copper Co. Employment Office
- Auto Repair Garage
- Spokane Street Manufacturing Historic District
- Acme Tool Works
- Cettolin House
- Site 45KI52

FTA, SHPO, Sound Transit, Consulting Tribes, and other consulting parties developed a programmatic agreement to address known and potential adverse effects to historic and archaeological resources, including an inadvertent discovery plan (IDP). The executed programmatic agreement and the commitments therein are included in the ROD as Attachment D, are conditions of this WSLE ROD and are incorporated into the definition of the Project.

6.12 Section 4(f) of the United States Department of Transportation Act

Section 4(f) of the DOT Act (49 U.S.C. § 303, as implemented by 23 CFR Part 774) requires that the use of land from important public parks, recreation areas, wildlife refuges, or land containing historical sites of local, state, or federal significance be approved and constructed only if (a) there is no feasible and prudent alternative and (b) the Project includes all possible planning to minimize harm to these resources. If resources protected by Section 4(f) are involved in a project’s planning, a determination is required to confirm whether there is a “use” of those resources. Although the use of Section 4(f) property is generally prohibited, a transportation use of a Section 4(f) property can be approved if it meets the requirements for a regulatory exemption, the use will have a *de minimis* impact on the property (meaning that it does not adversely affect the activities, features, and attributes of a resource), or there is no feasible and prudent avoidance alternative to using the property.

In consultation with the official with jurisdiction, FTA determined that the Project would have a *de minimis* impact to the West Duwamish Greenbelt, a Section 4(f) park resource, and Fire Station 14, a NRHP-eligible Section 4(f) resource. The Project would have uses of six Section 4(f) resources eligible for the NRHP within the SODO and Duwamish Segments as described in Appendix H, Final Section 4(f) Evaluation, of the Final EIS:

- Graybar Electric Company Building
- Pacific Forge Company/Bethlehem Steel Nut and Bolt Factory Historic District
- Alaskan Copper Co. Employment Office
- Auto Repair Garage
- Spokane Street Manufacturing Historic District
- Acme Tool Works

Based on the analysis of potential Section 4(f) resource avoidance alternatives, FTA and Sound Transit found there are no prudent and feasible avoidance alternatives. When there is no feasible and prudent avoidance alternative, FTA may approve only the alternative(s) that cause the least overall harm based on an assessment of the seven factors listed in Code of Federal Regulations Title 23 Section 774.3(c)(1). Based on these factors, Preferred Option SODO-1c and Alternative SODO-1a are equal least harm alternatives for the SODO Segment, and Preferred Alternative DUW-1a and Option DUW-1b are equal least harm alternatives for the Duwamish Segment. Therefore, FTA finds that the Project as defined (the Final EIS Preferred Alternative) meets the requirements of Section 4(f).

Alternatives that avoid Section 4(f) uses in the other segments also meet the requirements of Section 4(f): Preferred Option DEL-6b, Alternative DEL-6a, and Alternative DEL-7 in the Delridge Segment and Preferred Option WSJ-5b, Alternative WSJ-5a, and Alternative WSJ-6 in the West Seattle Junction Segment.

6.13 National Environmental Policy Act

Specific sections of NEPA (42 U.S.C. §§ 4321–4347 and 4372–4375) as well as Executive Order 11514, Protection and Enhancement of Environmental Quality, require that federal agencies evaluate the environmental impacts of their actions, integrate such evaluations into their decision-making processes and implement appropriate policies.

The environmental record for WSLE includes the West Seattle and Ballard Link Extensions Draft EIS (January 2022), the WSLE Final EIS (September 2024), and the supporting materials incorporated therein. These documents represent the detailed statement required by NEPA describing:

- The environmental impacts of the planned action.
- The adverse environmental effects that cannot be avoided should the planned action be implemented.
- Alternatives to the planned action.
- Irreversible and irretrievable commitments of resources that will be involved should the planned action be implemented.

Having carefully considered the environmental record, environmental commitments listed in Appendix B of this ROD, Tribes, public and agency comments, and the findings below, FTA has determined that:

- The environmental review documents include a record of the environmental impacts of the proposal, adverse environmental effects that cannot be avoided, alternatives to the proposal, and irreversible and irretrievable impacts on the environment.
- The environmental process included cooperation and consultation with the U.S. Army Corps of Engineers (Corps), U.S. Coast Guard, U.S. Postal Service, Port of Seattle, and City of Seattle
- All reasonable steps have been taken to minimize adverse environmental effects of the Project.
- The Project meets its purpose and need and satisfies the requirements of NEPA.

**SUSAN KAY
FLETCHER** Digitally signed by
SUSAN KAY FLETCHER
Date: 2025.04.29
16:06:09 -07'00'

April 29, 2025

Susan Fletcher
Regional Administrator, Region 10
Federal Transit Administration

Date

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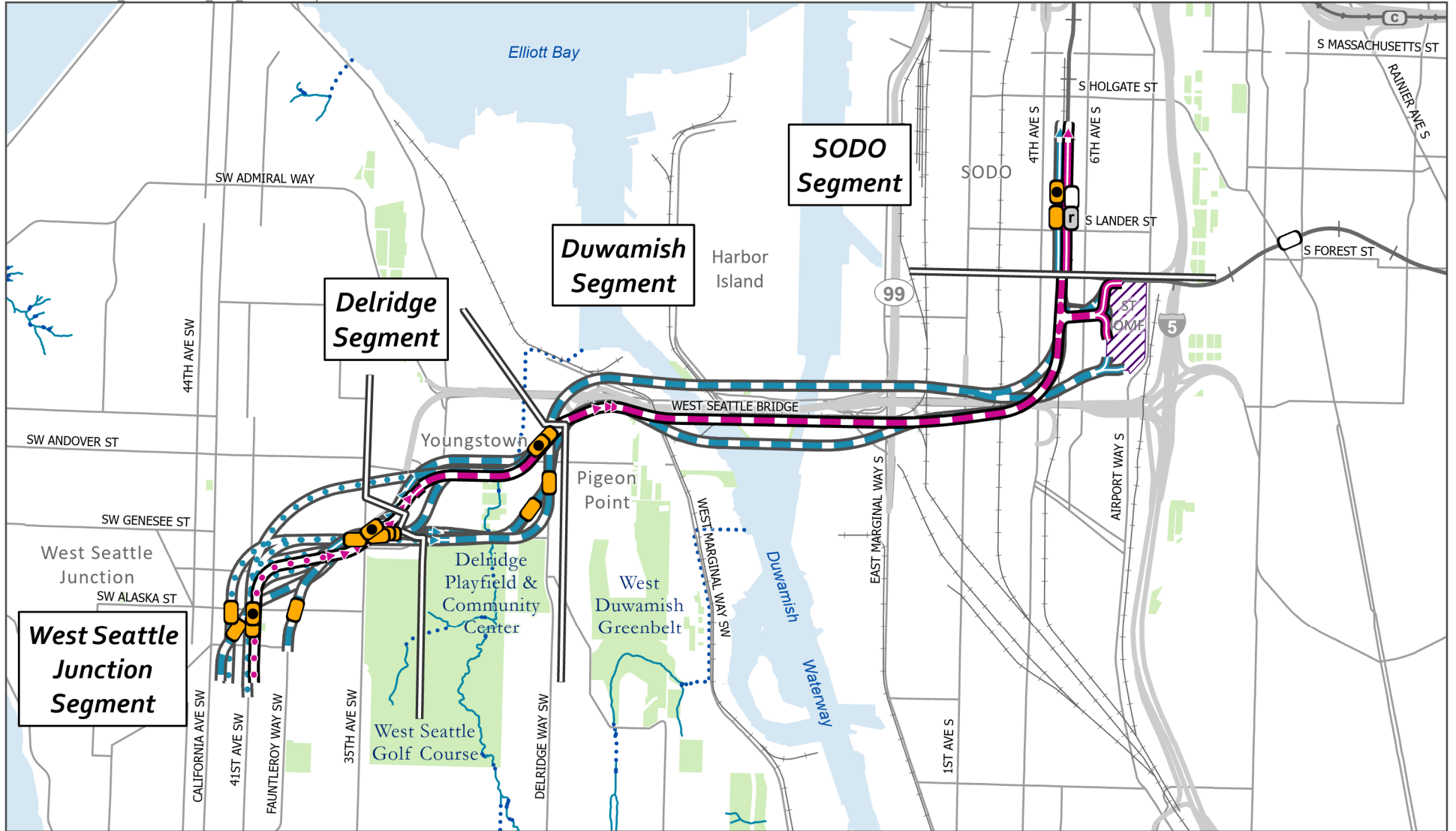
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Appendix A

Alternatives Considered in the Final EIS

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Source: City of Seattle, King County (2023).

Preferred Alternative

- Elevated
- At-Grade
- Tunnel
- Retained Cut

Other Alternatives

- Elevated
- At-Grade
- Tunnel
- Retained Cut

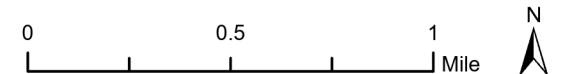
Station (● Indicates Preferred Alternative)

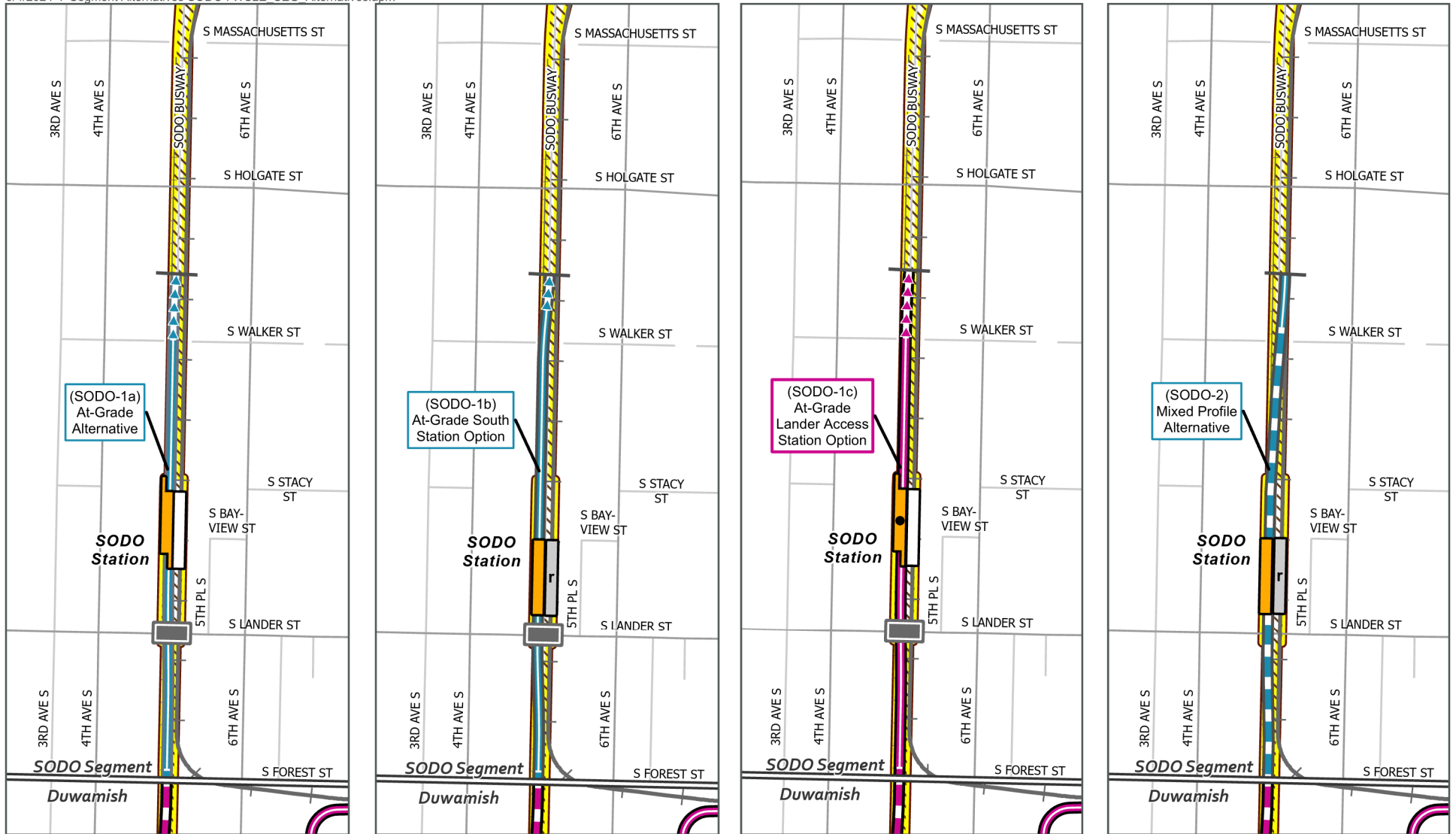
- New
- Relocated
- Existing

- Segment Line
- Sound Transit Operations and Maintenance Facility (ST OMF)
- Existing Link Light Rail
- East Link Light Rail (Under Construction)
- Railroad
- Stream
- Piped Stream
- Park

FIGURE A-1
Final EIS Alternatives

West Seattle Link Extension





Source: City of Seattle, King County (2023).

Preferred Alternative

- Elevated
- At-Grade
- Retained Cut

Other Alternatives

- Elevated
- At-Grade
- Retained Cut

Station (● Indicates Preferred Alternative)

- New
- Existing
- Relocated

- Segment Line
- Existing Link Light Rail
- Railroad
- SODO Busway
- Proposed Overpass

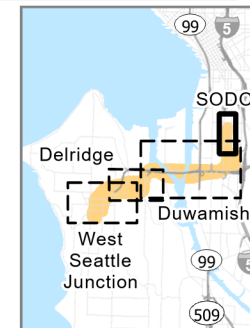
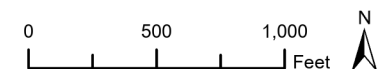
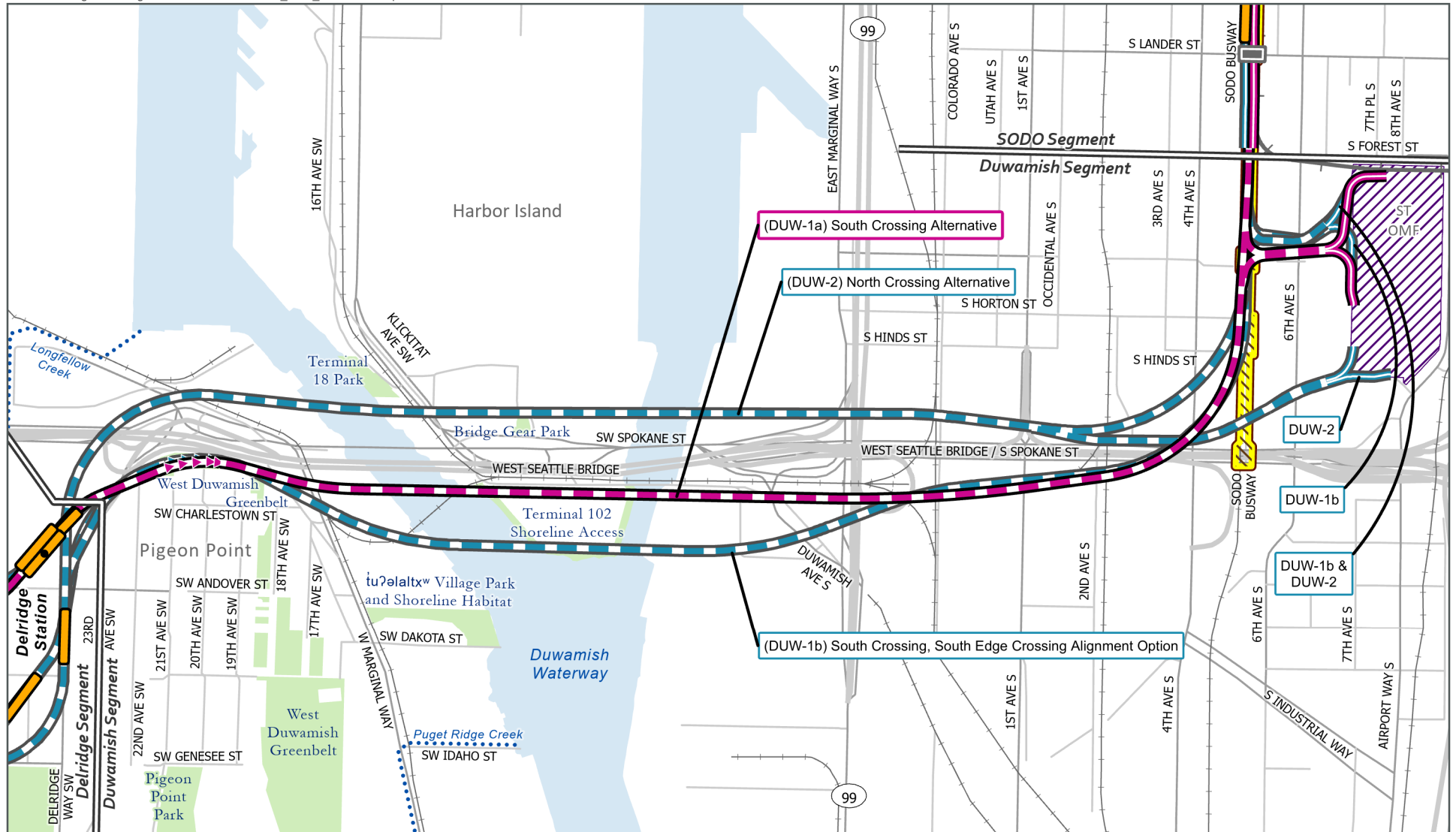


FIGURE A-2
Final EIS Alternatives
SODO Segment

West Seattle Link Extension





Source: City of Seattle, King County (2023).

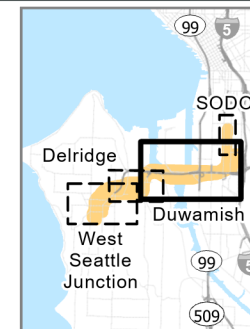
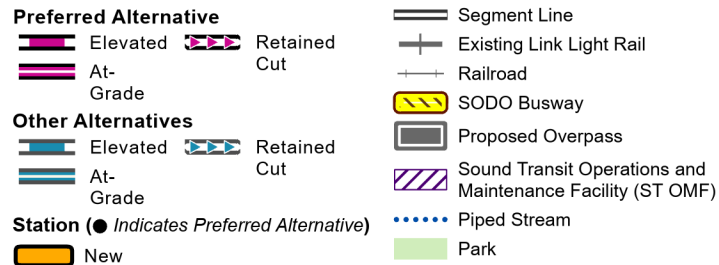
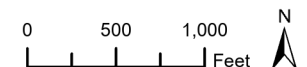
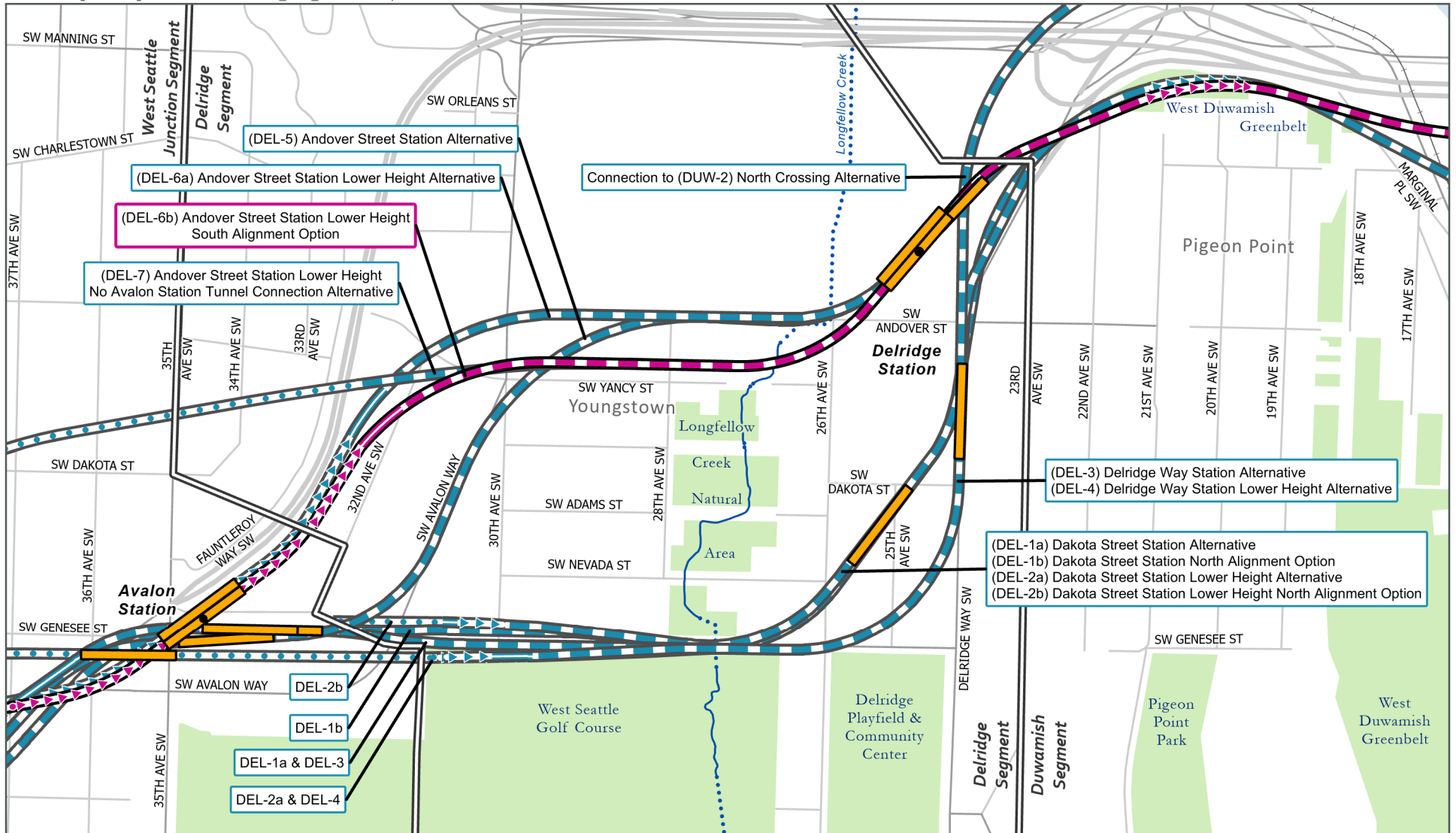


FIGURE A-3
Final EIS Alternatives
Duwamish Segment

West Seattle Link Extension





Source: City of Seattle, King County (2023).

Preferred Alternative

- Elevated
- At-Grade
- Tunnel
- Retained Cut

Other Alternatives

- Elevated
- At-Grade
- Tunnel
- Retained Cut

Station (● Indicates Preferred Alternative)

New

- Segment Line
- Railroad
- Stream
- Piped Stream
- Park

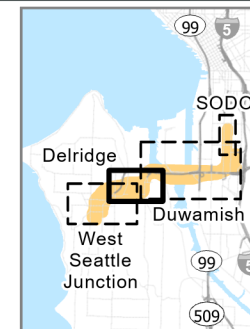
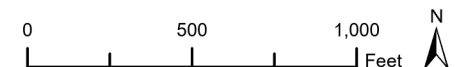
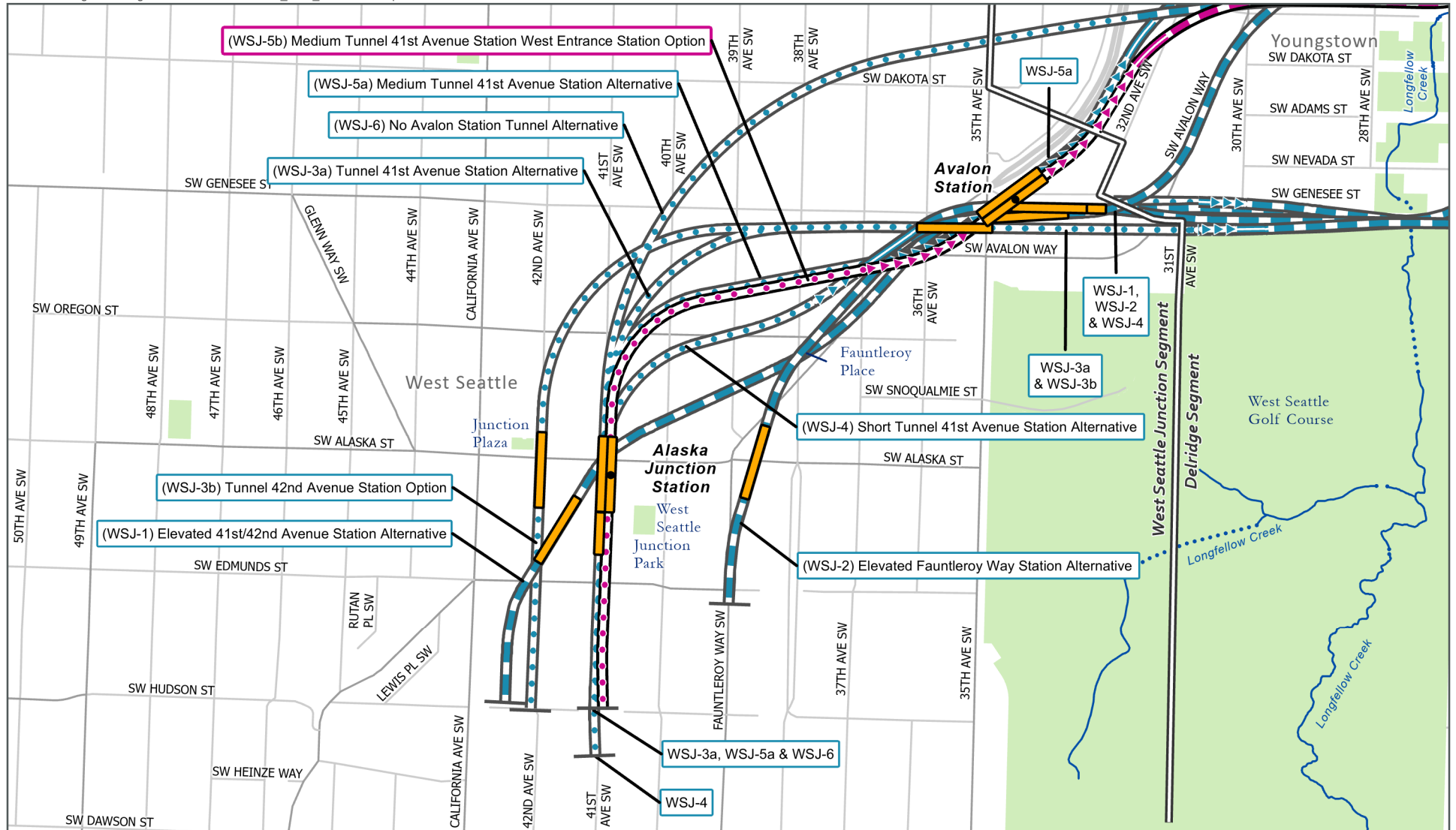


FIGURE A-4
Final EIS Alternatives
Delridge Segment

West Seattle Link Extension





Source: City of Seattle, King County (2023).

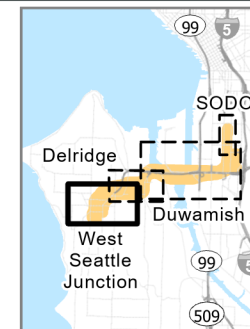
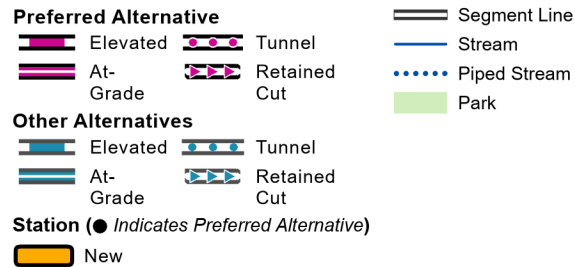
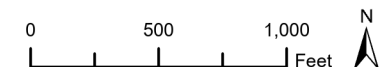


FIGURE A-5
Final EIS Alternatives
West Seattle Junction Segment

West Seattle Link Extension



Appendix B

Mitigation Plan

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Appendix B. Mitigation Plan

The mitigation plan for the West Seattle Link Extension Project (the project) describes Sound Transit's mitigation commitments that will be implemented to avoid or minimize the impacts of the project selected to be built (Preferred Alternative identified in the Final Environmental Impact Statement (EIS)). Many of the potential impacts identified through the EIS process will be mitigated through incorporation of avoidance, minimization, or improvement elements that are now included in the definition and design of the project. If the Sound Transit Board ultimately selects another alternative to build that is different from the Preferred Alternative described in the Final EIS, the mitigation plan will be modified accordingly.

This plan describes the mitigation measures associated with the operating (long-term) impacts of the project and the mitigation measures associated with construction impacts. The final mitigation measures will be included as conditions of the Federal Transit Administration's (FTA) Record of Decision (ROD) for the project. FTA will incorporate them in any future grant agreement that FTA may award Sound Transit for construction of the project. Sound Transit will track these measures and report quarterly to FTA to ensure that the mitigation commitments are being met. Where appropriate, Sound Transit will incorporate mitigation requirements into its contracting documents for final design and construction.

The mitigation measures described in Table B-1 are based on the potential mitigation measures identified in the Final EIS for the Preferred Alternative. As the project moves into final design and construction, additional design features may be identified that avoid or minimize project impacts. The table also includes measures that Sound Transit proposes to take but that require the agreement of other parties. For instance, Sound Transit has identified certain traffic improvements, traffic management, safety, and parking strategies to mitigate project-related impacts, but Sound Transit does not have the sole authority to make those improvements when the facilities are owned and managed by others. Others may also have alternative plans or projects to address future conditions with or without the project. In these cases, Sound Transit would coordinate with these other agencies and jurisdictions to further define and implement improvements to mitigate the project's impacts.

Table B-1. Mitigation Plan

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
Transportation	3.3 and 3.11	Regional Context and Travel	Long-term	No mitigation is required for operation.
			Construction	Mitigation for short-term (less than 1 year) construction closures of regional roadways would consist of Sound Transit providing information to drivers about closure timing and alternate routes. Because closures of nearby arterials would not result in impacts to regional facilities, no other mitigation is needed beyond what is identified in this table under Section 3.5, Arterials and Local Streets Operations, for the arterials themselves.
	3.4, 3.11, and Appendix N.1, Section 3.4	Transit	Long-term	<p>Sound Transit would lead coordination with transit service providers as the project advances to maintain efficient transit operations, including refinements to the transit service plan as described in the Transit Service and Facilities section of Section 3.3.2.1 of Appendix N.1, Transportation Technical Report. Impacts to transit facilities would be addressed through ongoing coordination between Sound Transit, the City of Seattle, King County Metro Transit (Metro), and the FTA to identify capital, routing, and access management strategies that would be implemented before transit service operations would be affected. Sound Transit would implement agreed-upon improvements that mitigate impacts directly associated with the project.</p> <p>Closure of the SODO Busway with Preferred Option SODO-1c would impact transit speed and reliability, and layover in the SODO area. Sound Transit has coordinated with the City of Seattle and Metro on the following mitigation strategies:</p> <ul style="list-style-type: none"> • Implementation of transit speed and reliability strategies on 4th Avenue South between South Spokane Street and South Royal Brougham Way. Potential strategies could include business access and transit lanes, freight and bus lanes, or queue jump lanes. • Implementation of improved pedestrian access and bus stop passenger amenities at bus stops along 4th Avenue South near the following intersections: South Royal Brougham Way, South Holgate Street, and South Lander Street. Improved bus stop passenger amenities are also identified on South Spokane Street near 4th Avenue South. Potential strategies could include wider sidewalks, moving poles and other obstructions in the bus stop zones, new or relocated transit benches and shelters, and revised curb ramps and crosswalks. • Replacement layover in the SODO area could use off-street properties currently being used by Sound Transit Express buses that may not be necessary for Sound Transit use in the future and on-street layover near the Atlantic/Central Bus Base.
			Construction	Sound Transit would lead coordination with Metro, the City of Seattle, and the FTA, where appropriate, to identify and confirm to bus service and associated infrastructure modifications and transit facility improvements that maintain transit service and access through construction areas. This would include continuing to coordinate on construction-related impacts to Metro's transit operations to determine the potential mitigation required,

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<p>as many of the alternatives close roadways served by transit and restrict access to transit facilities for varying durations.</p> <p>Sound Transit would maintain access to existing bus stops, layover areas, and comfort stations to the extent feasible and coordinate with Metro and the City of Seattle to minimize impacts and disruptions. Where needed, this coordination would include other transit operators. Where bus stops and layover cannot be maintained in existing locations, Sound Transit would implement temporary facilities to maintain service and access. Information would be communicated to riders in advance of construction at these locations.</p> <p>Sound Transit would maintain non-motorized access to transit, where feasible, through construction areas, such as providing dedicated walkways or alternative bike facilities around the construction area. Where non-motorized access is not able to be maintained through construction areas, Sound Transit would implement temporary non-motorized facilities to maintain non-motorized access to transit. Sound Transit would also notify the public of any closures.</p> <p>Construction-related transit service impacts such as the SODO Busway closure (whether permanent or temporary), as well as other transit pathway closures identified in the document, would be coordinated with Metro, the City of Seattle, and other relevant service providers. Sound Transit will coordinate with the City of Seattle, Metro, and other agencies as necessary to develop a transit operations plan for construction-related closures to transit pathways. These transit operations plans would identify bus detour routes and minimize impacts and disruptions to bus facilities and service performance and hours during project construction. This would include identifying associated improvements needed to implement these service and facility modifications, such as speed and reliability treatments (e.g., new transit lanes, transit signal priority, or similar). Sound Transit would continue to coordinate with the City of Seattle and Metro during final design to finalize a construction transit operations plan that would define specific transit reroutes, and identify agreed-upon speed and reliability improvements, bus stop modifications, temporary layover and comfort stations, and pavement management plans.</p> <p>SODO Segment (Preferred Option SODO-1c), Sound Transit is coordinating with Metro and the City of Seattle to refine mitigation strategies for the following construction transit operations and facilities impacts:</p> <ul style="list-style-type: none"> • Short-term partial closures of 4th Avenue South to construct the South Lander Street overpass of the new and existing light rail tracks and for the light rail guideway over 4th Avenue South near South Spokane Street. <ul style="list-style-type: none"> - Sound Transit is coordinating with the City of Seattle and Metro to identify ways to shift travel lanes and implement business access and transit lanes, freight and bus lanes, and/or transit queue jump lanes at strategic locations. • Long-term (2-year) closure of South Lander Street over the light rail tracks and to facilitate construction of the SODO Station. <ul style="list-style-type: none"> - The South Lander Street closure would require the reroute of Route 50 to either 4th Avenue South or 6th Avenue South.

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<p>Construction could result in the potential long-term closure of the existing 1 Line SODO Station while the new SODO Station is built.</p> <ul style="list-style-type: none"> Sound Transit is committed to maintaining the regional transit access provided by the SODO Station. Mitigation measures to maintain this access are still being identified by Sound Transit and agency partners, but could include the following: <ul style="list-style-type: none"> Studying the feasibility of building an interim station/platforms in the vicinity of the existing SODO Station with connections to transit routes on 4th Avenue South and South Lander Street. Key factors that require further study are whether there are adequate access routes to an interim station given the construction in the area and the operations/regulatory considerations to build and operate an interim station. Implementing a transit shuttle between the SODO Station area and Stadium Station. Working with Metro to adjust routing of buses near the SODO Station to provide a convenient connection from the SODO Station area to an adjacent 1 Line station (Stadium and/or Beacon Hill stations). <p>West Seattle Junction Segment (Preferred Option WSJ-5b) requires short-term partial closure of Southwest Alaska Street to construct stations and guideways.</p> <ul style="list-style-type: none"> Sound Transit would implement traffic control measures to minimize congestion impacts on bus operations along Southwest Alaska Street. <p>West Seattle Junction Segment (Preferred Option WSJ-5b) would require a full closure of 35th Avenue Southwest between the West Seattle Bridge and Southwest Avalon Way to construct the Avalon Station.</p> <p>Sound Transit would work with the City of Seattle and Metro on construction reroutes for Route 21X to navigate the closure of 35th Avenue Southwest. A potential pathway along Southwest Avalon Way to Southwest Spokane Street would not require any changes to signals or pavement.</p>
	3.5, 3.11, and Appendix N.1, Section 4.4	Arterials and Local Streets	Long-term	<p>Mitigation could be required at intersections where the intersection level of service (L.O.S.) would not meet agreed-to project-specific L.O.S. thresholds when compared to the No Build Alternative. For Build Alternatives, affected intersections are identified and defined as locations expected to degrade from L.O.S. D or better in the No Build Alternative to L.O.S. E or F with the project, or if the intersection already operates at L.O.S. E or F in the No Build Alternative have noticeably worse vehicle delays in the Build Alternative (10 percent or higher vehicle delay than in the No Build Alternative). In addition to the impacted intersections, the transit treatment measures that could be implemented to mitigate the permanent closure of the SODO Busway with Preferred Option SODO-1c could potentially impact the arterial street system.</p> <p>Sound Transit will continue to work with the City of Seattle and the FTA as project design progresses to minimize project-related intersection delays. Where additional project-</p>

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<p>related delays are unavoidable, Sound Transit will work with the City of Seattle to identify potential mitigation, with the intent of either meeting agreed-upon L.O.S. thresholds during the a.m. and p.m. peak hours or attaining a similar vehicle delay as the No Build Alternative.</p> <p>The intersection mitigation treatments would likely vary depending on the intersection location and cause of the increased vehicular delay. At intersections or movements where the delay is the result of vehicular operations such as pick-up/drop-off activity or additional transit buses, mitigation measures could include corridor signal optimization, upgraded signal technologies, implementation of corridor intelligent transportation system strategies, traffic movement and turn restrictions, or added intersection capacity, where feasible. For intersections or movements where increased delay is due primarily to increased non-motorized activity associated with the station, mitigation could be focused instead on strategies such as signal optimization for pedestrians, intersection crossing enhancements, pedestrian and/or bicycle facility modifications, reducing conflicts between vehicles and non-motorized users, or wayfinding, with the goal of improving safety and providing more efficient movement of pedestrians and cyclists.</p> <p>Final mitigation would be determined and agreed upon by Sound Transit and the City of Seattle, in coordination with the FTA and may include Sound Transit contributing a proportionate share of costs to improve intersections based on the project's proportionate ratio of trips at the intersection or another equitable method.</p> <p>The following sections describe mitigation measures that are being considered for specific impacted locations associated with the Preferred Alternative.</p> <p>SODO Segment</p> <p>As described above, the mitigation measures being considered for 4th Avenue South to address the transit travel time impact of closing the SODO Busway could impact arterial operations. This impact could be avoided by implementing transit treatment measures that do not reduce the general-purpose traffic capacity of 4th Avenue South though that may result in trade-offs in the extent to which the transit travel time impact could be mitigated. Specific mitigation for the permanent closure of the SODO Busway would be determined through coordination between Sound Transit, City of Seattle, and Metro.</p> <p>Delridge Segment</p> <p>This section identifies potential mitigation measures for intersections that are expected to be impacted by the project. Potential intersection mitigation options below apply to the Preferred Alternative. While these measures could reduce the magnitude of the impact, any modifications would be coordinated with the City of Seattle to determine whether they are consistent with City priorities and preferable given other trade-offs and modal priorities:</p> <ul style="list-style-type: none"> • Delridge Way Southwest and 23rd Avenue Southwest

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				<ul style="list-style-type: none"> - The main cause of the traffic operations impact at this location is southbound delay during the p.m. peak hour as high volumes of vehicles exit the West Seattle Bridge. With the No Build Alternative, that southbound delay is associated with the Delridge Way Southwest/Southwest Andover Street signal as it is the first signalized intersection after exiting the bridge. By implementing a new signal upstream at 23rd Avenue Southwest, the southbound delay assigned to the Southwest Andover Street only includes the stretch of roadway between Southwest Andover Street and 23rd Avenue Southwest and the remaining delay is shifted to the 23rd Avenue Southwest signal. In other words, while the Preferred Alternative includes a new impact to this location, the broader effect on traffic operations would not differ substantially. - Although this intersection would experience increased levels of delay by becoming the new access point for Nucor Steel, the station area, and any associated transit-oriented development, it is expected to provide better circulation, safety, and traffic operations than if the Preferred Alternative did not include this new signal and circulation concept. This circulation concept has been developed in coordination with the City of Seattle and Metro and any modifications could create secondary impacts to other modes or conflict with agency priorities or policies. Sound Transit will continue to refine the station concept through final design in partnership with the City of Seattle and Metro and determine whether further mitigation to reduce vehicle delay is included in the project. • Delridge Way Southwest and Southwest Dakota Street <ul style="list-style-type: none"> - Vehicles turning from Southwest Dakota Street onto Delridge Way Southwest at this side-street stop control intersection would experience increased delay as they wait for gaps in traffic on Delridge Way Southwest. This impact could be mitigated by adding a signal at this location. Sound Transit will continue to work with the City of Seattle and Metro regarding transit treatments and signal operations at this location and determine whether further mitigation to reduce vehicle delay is included in the project. • Delridge Way Southwest and Southwest Genesee Street <ul style="list-style-type: none"> - Adding an eastbound right-turn pocket on Southwest Genesee Street to allow more vehicles to move through the intersection during the eastbound green time would mitigate this impact. <p>West Seattle Junction Segment</p> <p>This section identifies potential mitigation measures for intersections that are expected to be impacted by the project. Potential intersection mitigation options below apply to the Preferred Alternative. While these measures could reduce the magnitude of the impact, any modifications would be coordinated with the City of Seattle to determine whether they are consistent with the City's priorities and preferable given other trade-offs and modal priorities:</p> <ul style="list-style-type: none"> • Fauntleroy Way Southwest and 35th Avenue Southwest

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<ul style="list-style-type: none"> - Adding an overlap phase to the northbound right turn during the westbound left phase, modifying the signal cycle length to 120 seconds, and/or maintaining a channelized right turn could potentially mitigate this impact. Sound Transit is coordinating with the City of Seattle and Metro to refine the intersection layout and signal operations to balance the needs of all modes. Effects to adjacent intersections whose signals are coordinated with this location would also need to be considered. • Southwest Genesee Street and Southwest Avalon - Revising the intersection to allow northbound left turns into the station area would result in increased delay for vehicles on Southwest Avalon Way. Modifying the signal cycle length to 120 seconds would mitigate the additional delay.
			Construction	<p>Sound Transit will develop a Construction Access and Traffic Management Plan for the project for whichever Build Alternative is selected. The plan would be developed as the project advances and include the overarching goals and objectives for the project's construction and the approach to partner agency coordination. It would include applicable mitigation commitments to be built by Sound Transit, finalized as part of the environmental documentation, as well as additional detail reflecting continued design for the project after the Final EIS. Components likely to be addressed in detail include maintaining business access; minimizing construction disruption during large events; providing alternate routes for freight, general traffic, and non-motorized access; parking management; pavement restoration as appropriate; and maintaining transit operations (such as bus and light rail).</p> <p>Potential construction mitigation measures will be consistent with the applicable City requirements. Sound Transit would prepare traffic control plans during subsequent design phases to coordinate on how all modes of transportation would be maintained and address pedestrian and bicycle access and safety. Mitigation measures will follow the Manual on Uniform Traffic Control Devices for Streets and Highways (Federal Highway Administration 2009) and the City of Seattle Traffic Control Manual (City of Seattle 2012) for maintenance of traffic plans. Potential measures to minimize construction traffic impacts could include the following practices:</p> <ul style="list-style-type: none"> • Install advance warning signs and highly visible construction barriers and use flaggers where needed. • Consider a variety of traffic and travel demand management strategies, such as supporting employer incentives or programs to use transit. • Clearly sign and provide detour routes when streets are fully or partially closed for elevated guideway and trench construction. The contractor would be required to keep nearby parallel facilities open to facilitate access and mobility. • For extended closures requiring substantial traffic detours, Sound Transit would coordinate with the City of Seattle to consider temporary physical treatments such as roadway rechannelization, traffic signals, and transit priority treatments.

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				<ul style="list-style-type: none"> • Use lighted or reflective signage to direct drivers to truck haul routes to ensure visibility during nighttime work hours. Use special lighting for work zones and travel lanes, where required. • Communicate public information through tools such as print, radio, posted signs, websites, and email to provide information regarding street closures, hours of construction, business access, and parking impacts. • Coordinate access closures with affected businesses and residents. If access closures are required, property access to residences and businesses would be maintained to the extent possible. If access to the property cannot be maintained, the specific construction activity would be reviewed to determine if it could occur during non-business hours, or if the parking and users of this access (e.g., deliveries) could be accommodated at an alternative location. • Post advance notice signs prior to construction in areas where construction activities would affect access to surrounding businesses. • Provide regular updates to schools, emergency service providers, local agencies, solid waste utilities, and postal services, and assist school officials in providing advance and ongoing notice to students and parents concerning construction activity near schools. • Schedule traffic lane closures and high volumes of construction truck traffic during off-peak hours to minimize delays, where practicable. In addition, closures of parallel arterials or access points would be coordinated with the goal of avoiding simultaneous closures. • Cover potholes and open trenches, where possible, and use protective barriers to protect drivers from open trenches. • To minimize potential freight impacts, coordinate with affected businesses throughout the construction period to notify them of lane and access closures and maintain business access as much as possible. • Provide construction information to Washington State Department of Transportation (WSDOT) for use in the state's freight notification system when construction activities could affect state facilities, such as State Route 99. Sound Transit would provide information in the format required by WSDOT. • Coordinate with the City of Seattle and other relevant agencies to disseminate construction closure information to the public. <p>The above mitigation measures could decrease vehicle demand, particularly peak hour demand, through the construction areas. The travel demand management strategies would help to mitigate the traffic operations impacts expected during construction. In addition to the measures described above which apply to all Build Alternatives, the following section describes mitigation measures that are being considered for specific locations expected to be impacted by the Preferred Alternative. Although the following discussion reflects the construction closures expected with the Preferred Alternative, the types of measures would also apply to other alternatives, for example, signal timing</p>

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<p>revisions, lane reconfigurations, and transit treatments such as queue jumps.</p> <p>In addition to the measures described above, the following list describes mitigation measures that are being considered for specific locations expected to be impacted by the Preferred Alternative.</p> <p>SODO and Duwamish Segments</p> <p>A VISSIM traffic microsimulation model was used to evaluate 4th Avenue South corridor operations under Construction Scenario 1 and 2. The results of the Construction Scenario 1 and 2 evaluations are described in Section 4.3.3.3 of Appendix N.1.</p> <p>For Construction Scenario 1, travel times on 4th Avenue South from South Spokane Street to the Interstate 90 Westbound Off-Ramp could increase by 1 minute for vehicles, freight, and transit due to increased congestion between South Lander Street and South Holgate Street. Based on the mitigation options tested for the 2042 Build conditions, a potential measure to minimize construction traffic impacts for buses could include constructing a northbound transit queue jump at 4th Avenue South/South Holgate Street, and a southbound transit queue jump at 4th Avenue South/South Lander Street. The VISSIM model indicated that the transit queue jumps could reduce transit travel time by about 30 seconds, and result in up to 30 seconds of delay for vehicle and freight travel times along 4th Avenue South. The impact to 6th Avenue South/South Spokane Street may be mitigated with signal timing revisions including lengthening the cycle from 110 to 130 seconds.</p> <p>For Construction Scenario 2, a transit improvement was incorporated into the analysis. The existing northbound bus stop just north of South Spokane Street was assumed to shift to a near-side stop in the northbound right-turn lane approaching the intersection, with a transit queue jump so that buses would not have to merge back into the northbound through lanes. With this transit treatment in place, travel times along 4th Avenue South for vehicles, freight, and transit were similar to no build conditions.</p> <p>Delridge Segment</p> <p>No location-specific construction impacts are expected with the Preferred Option DEL-6b; therefore, no mitigation measures are identified.</p> <p>West Seattle Junction Segment</p> <p>The construction analysis described in Section 4.3.3.5 of Appendix N.1 incorporates a variety of lane configuration and signal timing measures to improve traffic flow and minimize delay during the roadway closures required for Preferred Option WSJ-5b. As the project advances, Sound Transit will continue to refine its construction approach and seek ways to limit impacts on traffic operations. However, there are no additional location-specific mitigation measures identified at this time beyond those already included in the analysis.</p>

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	3.6 and 3.11	Parking	Long-term	All of the segments have areas of unrestricted parking that could be affected by light rail riders parking near the station. To mitigate this potential impact, Sound Transit would work with the City of Seattle to consider appropriate on-street parking measures within a 0.25-mile radius of each station to discourage hide-and-ride activity while retaining curb use functions to support area businesses or residents. Sound Transit would inventory on-street parking around each station before and after the start of light rail revenue service and would then work with the City to determine where mitigation measures would be needed. Potential parking control measures include parking meters, restricted parking signage, time-limit signs, passenger and truck load zones, and restricted parking zone programs. Sound Transit would be responsible for the cost of installing the signage or other parking controls for 1 year after the light rail extension begins operation. The local jurisdiction would be responsible for monitoring, enforcing, and maintaining the parking controls. In addition, Sound Transit would coordinate with the City of Seattle to relocate affected Americans with Disabilities Act parking spaces.
			Construction	Through the permit process, Sound Transit would coordinate with the City of Seattle on measures to address temporary curbside management and project parking impacts during construction, in conjunction with the other infrastructure and development projects in the study area. This would include temporarily relocating affected Americans with Disabilities Act stalls or load zones that would continue to serve adjacent land uses. Increased bus service (such as bus bridges) implemented as mitigation for interruptions to transit service during construction could affect parking supply and would be coordinated with the City of Seattle and other relevant parties. Sound Transit would work with owners and operators of garages where parking could be removed or where ingress or egress could be blocked during construction. Sound Transit would prohibit construction worker parking on City streets outside of the staging areas and require the contractor to develop a Parking Plan describing where construction worker parking would be allowed.
	3.7, 3.11, and Appendix N.1, Section 6.4	Non-Motorized Facilities	Long-term	The West Seattle Link Extension is not expected to permanently impact existing designated bicycle facilities or routes. If impacts are identified as the project advances, Sound Transit will work with the City of Seattle to rebuild the affected facilities or develop alternate facilities or routes that achieve, to the extent feasible, a similar level of protection and comfort afforded by the facility being impacted. These replacements would be funded by Sound Transit and may include, for example, protected or standard bicycle lanes, trails, and neighborhood greenway treatments, along with associated design elements such as pavement markings and bike signals where needed. Under the full-build condition, no pedestrian facilities would have an L.O.S. impact with the West Seattle Link Extension. No pedestrian facilities would have an L.O.S. impact under the minimum operable segment.

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<p>The project may also have direct physical impacts to existing sidewalks and trails due to placement of guideway columns in the Duwamish and Delridge segments, and several streets in the Delridge and West Seattle Junction segments would be permanently closed, potentially eliminating pedestrian and bicycle access at those locations. As the project design is refined and potential column locations are identified with greater precision, additional pedestrian and bicycle visibility issues may emerge. These visibility issues could be mitigated with measures such as protected vehicle turns or restricting vehicle movements.</p> <p>Sound Transit will rebuild affected non-motorized facilities to meet Americans with Disabilities Act requirements as well as applicable local design standards at the time of permitting (such as Seattle Streets Illustrated [City of Seattle 2020] and the Seattle Land Use Code and Light Rail Facility Construction and Construction Impacts sections of the Seattle Municipal Code) or to a standard agreed to by Sound Transit and the City of Seattle.</p> <p>As the project design advances, if it is determined that a facility could not be rebuilt to applicable design standards and an alternate design cannot be agreed upon in the original location, Sound Transit would work with the City of Seattle to develop mitigation, such as an alternate route.</p>
			Construction	<p>When non-motorized facilities such as sidewalks and bicycle lanes must be temporarily closed for construction, Sound Transit would provide marked detours, such as dedicated walkways and alternate bicycle routes that may include treatments such as pedestrian and bicycle signals, signal optimization including leading pedestrian intervals, crosswalks, curb bulbs, rectangular rapid flashing beacons, pavement markings, and temporary signals. Where possible, temporary facilities will be designed to applicable design standards such as Seattle Streets Illustrated (City of Seattle 2020), Standard Plans for Municipal Construction (City of Seattle 2023), or as agreed to by the City of Seattle; at a minimum they will comply with Americans with Disabilities Act requirements.</p> <p>If maintaining a facility is not feasible, Sound Transit would work with the City of Seattle to develop and implement a construction management plan to provide alternate facilities that, to the extent feasible, offer a similar level of protection and comfort. Where already identified, specific mitigation measures are described by segment below. As design progresses, these detours will be refined in coordination with the City of Seattle.</p> <p>SODO Segment</p> <p>Under the SODO Trail construction closure (approximately 4 years), pedestrians and bicycles would be detoured to 6th Avenue South, approximately 280 feet to the east with east-west access maintained at adjacent street crossings. Sound Transit will work with the City of Seattle to identify and implement a design on 6th Avenue South that achieves, to the extent feasible, a similar level of protection and comfort as the affected facility.</p>

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				<p>During the South Lander Street closure, Sound Transit would maintain a temporary pedestrian connection south of South Lander Street to allow access between 4th Avenue South and 6th Avenue South.</p> <p>Duwamish Segment</p> <p>The Delridge Connector Trail from Delridge Way Southwest to the West Seattle Bridge Trail would be rerouted during construction. Rather than run along the east side of Delridge Way Southwest, the trail would be detoured along the 23rd Avenue Southwest pathway on the west side of Delridge Way Southwest (starting at roughly Southwest Charlestown Street). The 23rd Avenue Southwest pathway would connect to the trail on the north side of the West Seattle Bridge via a series of improvements Sound Transit is designing in coordination with the City of Seattle. The 22nd Avenue Southwest connection to the Delridge Connector and stairway from 22nd Avenue Southwest to Delridge Way Southwest would also be temporarily closed.</p> <p>Pedestrians and bicyclists would be detoured via Southwest Andover Street and 23rd Avenue Southwest, where they could use the new signal at Delridge Way Southwest and 23rd Avenue Southwest to access the detour route. These replacements will be located and designed in coordination with the City of Seattle and funded by Sound Transit.</p> <p>Pedestrian and bicycle facilities removed or damaged by construction would be replaced, to the extent feasible, by permanent facilities that meet applicable design standards or as agreed to by the City of Seattle when project construction is complete.</p>
	3.8 and 3.11	Safety	Long-term	In the SODO Segment, the space underneath the South Lander Street overpass would be designed in accordance with Crime Prevention Through Environmental Design principles, including adequate lighting and open sightlines to adjacent spaces, to ensure pedestrian visibility and security. Also see mitigation under Transit, Arterials and Local Streets, and Non-motorized Facilities.
			Construction	During construction, Sound Transit would develop a Maintenance of Traffic Plan to adhere to federal and local agency guidelines. The Maintenance of Traffic Plan would be created to minimize safety concerns on the transportation system during construction as discussed in this table under the impact topic arterials. The mitigation discussed in this table for construction under the impact topics of transit and non-motorized facilities would also maximize safety.
	3.9 and 3.11	Navigation	Long-term	During final design and the bridge permitting process, Sound Transit would determine mitigation actions in coordination with the Muckleshoot Indian Tribe, the Suquamish Tribe, and the United States Coast Guard (Coast Guard), and the United States Army Corps of Engineers. This would include identifying specific aids to navigation, such as signage and lighting. Proposed aids to navigation would be approved by the Coast Guard prior to installation.

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
			Construction	<p>The FTA, in coordination with Sound Transit, will continue government-to-government consultation with the Muckleshoot Indian Tribe and the Suquamish Tribe to avoid or minimize impacts to Tribal treaty-protected fishing rights and access to Usual and Accustomed Areas during construction.</p> <p>Sound Transit would develop a construction navigation management plan in consultation with the Coast Guard, United States Army Corps of Engineers (Corps), and Port of Seattle to mitigate impacts to navigation during construction. Measures in the plan could include the following:</p> <ul style="list-style-type: none"> • Create a marine safety zone (to be approved by the Coast Guard and Corps) to help motorized and non-motorized waterway users pass through the Harbor Island Reach and East Waterway construction zones. • Provide a safe and easily recognizable path for non-motorized waterway users through the marine safety zone. • Set up the marine safety zone so all construction features or potential obstacles can be seen during inclement weather. • Coordinate with maritime stakeholders and emergency service providers and conduct construction outreach prior to and throughout construction at key milestones or phases where navigation conditions could change. • Schedule navigation channel restrictions during a time of day or a day of the week with less vessel traffic. • Coordinate all maritime operations with the Coast Guard, Corps, Puget Sound Vessel Traffic Services, Puget Sound Harbor Safety Committee, and local mariners and advertise all changes to maritime operations in the Local Notice to Mariners publication.
	3.10 and 3.11	Freight Mobility and Access	Long-term	<p>Freight traffic could be affected by the mitigation options being considered on 4th Avenue South to address the impact to transit of the SODO Busway closure. Potential improvement options for the busway closure include modifying 4th Avenue South with bus queue jumps at key intersections, business access and transit lanes, and/or a freight and bus lane that could be shared by buses and trucks. The first two transit improvement options could increase delays to truck traffic on 4th Avenue South, and the third option could reduce delays for truck traffic on 4th Avenue South. Therefore, Sound Transit and the City of Seattle may choose to mitigate the effect to freight travel times by selecting freight and bus lanes as the improvement on 4th Avenue South.</p> <p>As part of the parking mitigation, Sound Transit would coordinate with the Seattle Department of Transportation to manage curb use in the station vicinities. This would include locating commercial vehicle and truck-only load zones to serve business needs.</p>
			Construction	<p>Prior to construction activities that fully or partially close a Major or Minor Truck Street, Sound Transit would work with the City of Seattle to accommodate truck turning maneuvers or to identify detour routes suitable for trucks. Construction activities that</p>

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				<p>affect the City of Seattle's Over-Legal Network, including Southwest Avalon Way and Fauntleroy Way Southwest, would be coordinated with the City of Seattle to identify construction management measures to maintain an envelope to accommodate oversized trucks during construction or to identify suitable alternative routes that would be defined prior to freight movements as part of the City's over-legal permit process.</p> <p>Sound Transit would coordinate with the BNSF Railway and Union Pacific Railroad prior to construction over rail tracks or ground improvements for guideway columns close to the rail tracks. To the extent feasible, construction activity would adhere to schedule and minimum clearance requirements as agreed to by Sound Transit and BNSF Railway.</p> <p>Sound Transit would work with the Port of Seattle and Northwest Seaport Alliance to identify construction management measures to maintain adequate port terminal access and operations along its primary drayage routes between the marine and rail terminals. This could include identifying alternative routes for trucks if construction closures affect access or drayage routes along South Spokane Street and other streets that connect the Port terminals to local railyards. Sound Transit would coordinate with the Port of Seattle and Northwest Seaport Alliance on the construction schedule and sequencing to minimize major construction work on key freight corridors at the same time.</p> <p>For locations where truck-only load zones, commercial load zones, or general load zones would be eliminated but the businesses that rely on them remain, Sound Transit would coordinate with the City of Seattle to relocate these commercial load zones.</p>
Acquisitions, Displacements, and Relocations	4.1		Long-term	<p>Sound Transit's policies and procedures comply with the federal Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (Uniform Act) and the Washington state relocation and property acquisition requirements.</p> <p>Sound Transit would compensate affected property owners (and relocation would occur) in accordance with the Uniform Act and the Sound Transit <i>Real Property Acquisition and Relocation Policy, Procedures and Guidelines</i> (Sound Transit 2017). Benefits would depend on the level of impact, available relocation options, and other factors. With regard to property acquisitions at the Nucor Steel property, Sound Transit would coordinate with the property owner to maintain operations.</p> <p>Relocation would occur in accordance with the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 and the Sound Transit Real Property Acquisition and Relocation Policy, Procedures and Guidelines (Sound Transit 2017). As described in the policy, Sound Transit provides advisory services to property owners above the minimum requirements of federal and state law in some cases.</p>
			Construction	No mitigation is required for construction.

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
Land Use	4.2		Long-term and Construction	No mitigation is required for operation or construction.
Economics	4.3		Long-term	In most cases, with relocation assistance for business displacements, the project is not anticipated to result in adverse effects that would require mitigation. Sound Transit would explore ways to maintain water-dependent business operations. For the Duwamish Segment, Sound Transit would work with affected businesses on the Riverside Millworks property to determine if they could continue to operate on the southern portion of the property or to find a suitable relocation site.
			Construction	<p>Construction management plans would be developed to address the needs of businesses and could include, but are not limited to, the following measures:</p> <ul style="list-style-type: none"> • Provide a 24-hour construction telephone hotline for community members to report issues to Sound Transit community engagement staff, who work with the construction team to resolve issues and respond to the community member. • Provide business cleaning services on a case-by-case basis. • Provide detour, open for business, and other signage as appropriate. • Establish effective communications with the public through measures such as meetings, construction updates, alerts, and schedules. • Implement promotion and marketing measures to help affected business districts maintain their customer base, consistent with Sound Transit policies, during construction. • Maintain access as much as possible to each business and coordinate with businesses during times of limited access. • Provide a community ombudsman consistent with Sound Transit policy. In the event that complaints arise about construction impacts that could not be resolved by community outreach staff or the relevant department director, the ombudsman policy provides a process for addressing those complaints in an impartial, fair, and timely manner that ensures effective stewardship of public resources and minimizes construction impacts. <p>Because project design could affect Tribal treaty-protected fishing rights and access to the Usual and Accustomed Areas of the Muckleshoot Indian Tribe, Sound Transit and the FTA would:</p> <ul style="list-style-type: none"> • Continue working with the Muckleshoot Indian Tribe to avoid and mitigate impacts to treaty fishing rights and access to the Usual and Accustomed Areas from construction of the Duwamish crossing through ongoing government-to-government consultation. Sound Transit will not authorize construction of the Duwamish Waterway crossing prior to reaching agreement with the Tribe on these measures.

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<p>Because project design could affect Tribal treaty-protected fishing rights and access to the Usual and Accustomed Areas of the Suquamish Tribe, Sound Transit and the FTA would:</p> <ul style="list-style-type: none"> Continue working with the Suquamish Tribe to avoid and mitigate impacts to treaty fishing rights and access to the Usual and Accustomed Areas from construction of the Duwamish crossing through ongoing government-to-government consultation. Sound Transit will not authorize construction of the Duwamish Waterway crossing before reaching agreement with the Tribe on these measures.
Social Resources, Community Facilities, and Neighborhoods	4.4		Long-term	Sound Transit would coordinate with the SODO Business Improvement Area, 4Culture, and other community organizations to mitigate for the loss of the SODO Track murals with replacement murals or other public art in the area (where appropriate and feasible).
			Construction	No mitigation is required for construction.
Visual and Aesthetic Resources	4.5		Long-term	<p>Sound Transit has developed mitigation measures for areas with visual impacts in the Duwamish Segment and the Delridge Segment. Site-specific mitigation measures are described below by segment. The design of structures associated with the preferred alternatives (including access ramps, traction power substation facilities and vent structures) will continue to be refined through preliminary design to minimize visual impacts to surrounding sensitive viewers. The areas for each segment where there would be visual impacts are identified on Final EIS Figures 4.5 1, 4.5-2, and 4.5-12 (shown with ovals).</p> <p>Most of the visual quality impacts would be mitigated by planting screening vegetation where appropriate and where it meets the Sound Transit safety clear zone and setback requirements along the edge of construction footprints or within residential properties (if desired by residents). The vegetation would screen views of new project components and/or areas that are currently screened by vegetation that would be removed. Existing plant material would be protected to the extent possible to preserve a sense of scale and history. Plant material would be used to enhance the visual quality of the station areas and to integrate them with their surrounding environment. Plant selection would be adaptive plants that are suitable for the Northwest climate and the environment in which they are planted. Mitigation measures would be further refined if necessary in coordination with the City of Seattle as the project design advances.</p>

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<p>The use of vegetation to buffer or screen views of Build Alternative elements would not provide immediate mitigation. Depending upon the vegetation's location in relationship to sensitive viewers, distance to Build Alternative elements, size of the elements, and the growth rates of the vegetation selected, effective screening of the elements could take between 5 years and 10 years and perhaps as many as 15 years.</p> <p>Impacts associated with some of the higher elements of the alternatives, such as bridges crossing the West Duwamish Waterway, could not be completely mitigated by vegetative screening. The impacts of these elements on sensitive viewers could be lessened with the strategic planting of vegetation, but the elements themselves would be too large to screen, and they would produce unavoidable impacts.</p> <p>Duwamish Segment</p> <p><u>Area 1: Residential Areas along 22nd Avenue Southwest and 23rd Avenue Southwest</u></p> <p>Following construction, plant vegetation where appropriate to screen views of areas to the west, elevated guideway, and Delridge Way Southwest from remaining residences on 23rd Avenue Southwest.</p> <p>Delridge Segment</p> <p><u>Area 1: Residences along Delridge Way Southwest and 23rd Avenue Southwest from Eastern Edge of Segment to Southwest Andover Street</u></p> <p>Following construction, plant vegetation where appropriate to screen views of areas to the west, the elevated guideway, and Delridge Way Southwest from remaining residences on 23rd Avenue Southwest.</p> <p><u>Area 3: Delridge Way Southwest, 25th Avenue Southwest, and 26th Avenue Southwest</u></p> <p>Following construction, plant vegetation where appropriate to screen views of elevated guideway and station from remaining residences along Delridge Way Southwest, 25th Avenue Southwest and 26th Avenue Southwest.</p> <p><u>Area 6: Residential Areas North of Southwest Genesee Street and Longfellow Creek Natural Area</u></p> <p>Following construction, plant vegetation where appropriate that would not conflict with the light rail operations in front of remaining residences on north side of Southwest Genesee Street to replace vegetation removed for construction.</p> <p>Following construction, plant screening vegetation where appropriate along perimeter of stormwater detention facility to block views from adjacent residences.</p> <p><u>Area 7: Southwest Avalon Way</u></p> <p>Preferred Option DEL-6b would place an elevated guideway over the center of Southwest Avalon Way would be clearly seen by adjacent residents, but there would be no mitigation measures to reduce its impact. Therefore, no mitigation measures are proposed in this area.</p>

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<p><u>Area 8: Southwest Yancy Street</u></p> <p>Following construction, plant vegetation where appropriate to help screen views of the elevated guideway from remaining industrial buildings on both sides of Southwest Andover Street and Southwest Yancy Street.</p> <p><u>Area 9: 32nd Avenue Southwest</u></p> <p>Following construction, plant vegetation where appropriate to help screen views of the elevated guideway from remaining residences on both sides of 32nd Avenue Southwest.</p>
			Construction	No mitigation is required for construction.
Air Quality	4.6		Long-term and Construction	No mitigation is required for operation or construction. Potential impacts to air quality would be minimized or avoided through project planning, design, and the application of required best management practices during operation and construction, as described in FEIS Appendix L4.6D.
Noise and Vibration	4.7	Noise	Long-term	<p>Sound Transit is committed to minimizing project noise levels at their source for all of its light rail corridors. When noise would exceed FTA moderate or severe impact criteria, Sound Transit would consider noise mitigation measures consistent with its Link Noise and Vibration Policy (Resolution No. R2023-15; Sound Transit 2023), the Transit Noise and Vibration Impact Assessment Manual (FTA 2018), and the Sound Transit Design Criteria Manual (2021).</p> <p>The Link Noise and Vibration Policy provides the hierarchy for implementation of mitigation measures. It prioritizes reduction at the noise source, followed by measures to disrupt the noise path, such as sound walls. Lastly, it considers residential sound insulation. The policy also guides coordination with the affected property owners and reconsideration of noise impacts and mitigation during final design.</p> <p>Sound walls are the primary noise mitigation option for project operations because they are effective at reducing noise near the source. Sound walls for elevated profiles would be along the side of the top of the guideway; for other profiles, they would be next to the guideway on the ground or retaining structures. Sound walls are proposed for all areas with residential land uses in all segments. They are also proposed adjacent to Fire Station 14 in the Duwamish Segment.</p> <p>Wheel squeal reduction measures, including non-oil-based lubrication and friction modifiers, would be included in the project design following the Sound Transit policy in the Design Criteria Manual. Under Sound Transit policy, curves with a radius of less than 600 feet near noise-sensitive properties must have track lubricators installed as part of the project. Curves with a radius of 600 feet to 1,250 feet must be built to allow for subsequent lubrication if needed.</p> <p>For noise from crossovers, recommended mitigation would include special trackwork, such as moveable-point or spring-rail “frogs” (a mechanical installation enabling trains to be guided from one track to another, such as at a junction or where a spur or siding</p>

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<p>branches off), to eliminate the noise- and vibration-causing gap between tracks.</p> <p>When source mitigation measures or sound barriers are infeasible or not entirely effective at reducing exterior noise levels below the FTA impact criteria, and where the affected building does not already achieve a sufficient exterior-to-interior reduction of noise levels, Sound Transit would consider residential sound insulation. Sound insulation is normally only used on older dwellings with single-paned windows or in buildings with double-paned windows that are no longer effective because of leakage. Most newer buildings have effective exterior-to-interior noise reduction, and additional sound insulation might not be necessary. For this analysis, however, any location not mitigated to within the FTA criteria with sound walls would be considered for sound insulation. Sound insulation would be designed to reduce the interior noise levels in sleeping and living quarters in residential land uses to within the 45-A-weighted decibel (dBA) day-night equivalent sound level (Ldn) guidelines set by the U.S. Department of Housing and Urban Development. Under these guidelines, fresh air exchange must be maintained within the units. Sound insulation would not reduce exterior noise levels.</p> <p>The project would mitigate the majority of noise impacts with sound walls along the guideway and with special trackwork at track crossover locations. To avoid noise impacts from light rail operations Sound Transit will incorporate sound walls between 4 and 8 feet in the Duwamish and Delridge segments and between 4 and 10 feet in the West Seattle Junction Segment. In the Duwamish Segment, Sound Transit will review locations for potential sound insulation. A sound wall is proposed adjacent to Fire Station 14 in the Duwamish Segment.</p> <p>The modeling process is conservative, and proposed mitigation is based on the current project design. During final design, the detailed noise analysis would be updated based on a more advanced design. All predicted noise levels and mitigation measures would be reviewed. Mitigation would be modified as needed to reduce noise levels to below the FTA impact criteria. If equivalent mitigation could be achieved by a less costly means or if the final design analysis shows no impact, then the mitigation measure may be modified or eliminated. After light rail operations begin, if the resulting noise were to exceed FTA criteria, Sound Transit would evaluate the need for additional mitigation. More details on light rail noise mitigation are available in Appendix N.3, Noise and Vibration Technical Report. Attachment N.3D, Maps of Noise Impact Assessment, shows detailed maps of noise impacts with proposed mitigation, and Attachment N.3F, Tables of Noise Predictions, shows tables of noise predictions and includes predicted levels with mitigation.</p>
			Construction	Through compliance with applicable construction permits and management plans along with incorporating best management practices such as using broadband backup alarms during nighttime hours, minimizing the use of public address systems, ensuring internal combustion equipment is fitted with mufflers, and locating equipment away from noise-sensitive properties to the extent feasible, no additional mitigation for noise impacts would

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				be needed. Sound Transit would obtain a noise variance from the Seattle Department of Construction and Inspections to complete work during nighttime hours. For the construction staging areas near tunnel portals, mitigation measures could include construction of temporary noise barriers adjacent to the staging area. Detailed information on construction noise mitigation can be found in Appendix N.3.
		Vibration	Long-term	<p>Sound Transit would mitigate vibration and groundborne noise impacts that exceed FTA criteria. Vibration impacts are projected at several special trackwork locations as the wheels travel through the gap between tracks at these locations. Sound Transit would use low-vibration designs for special trackwork, referred to as low-impact frogs, to mitigate these impacts.</p> <p>For vibration impacts not caused by special trackwork, high-resilience direct-fixation fasteners would be used to reduce vibration levels. Fasteners are used to attach the rail to the concrete track slab. Alternative vibration mitigation approaches that may be applied under specific circumstances include increasing the thickness of the concrete under the track, specifying straighter rails, and building the track on top of pile foundation systems where the track would traverse very soft sections of soil.</p> <p>With the potential mitigation, project vibration and groundborne noise levels are expected to be below FTA criteria. In addition, the modeling process is conservative, and additional measurement information at affected buildings might show no or reduced impact. As project design advances, some impacts may be eliminated or the type of mitigation needed may change. During final design, the detailed vibration analysis would be updated based on more advanced design and would evaluate the specific buildings, and alternative mitigation measures might be warranted. All predicted vibration levels and mitigation measures would be reviewed. Mitigation would be modified as needed to reduce vibration levels to below the FTA impact criteria. Recommended vibration mitigation includes low-impact frog for Duwamish Segment (Preferred Alternative DEL-1a) and high-resilience direct-fixation fastener for Delridge (Preferred Alternative DEL-6b) and West Seattle Junction Segment (Preferred Alternative WSJ-5b).</p> <p>Additional information on light rail vibration mitigation can be found in Appendix N.3. Attachment N.3E, Maps of Vibration Impact Assessment, shows detailed maps of vibration impacts with proposed mitigation, and Attachment N.3G, Tables of Vibration Predictions, shows tables of vibration predictions and includes predicted levels with mitigation.</p>
			Construction	The primary means of mitigating vibration from construction activities are to conduct pre-construction surveys, locate equipment as far as possible from vibration-sensitive sites, use alternative low-vibration methods where practicable, and conduct vibration monitoring. The contractor, when selected, will prepare and implement a detailed Construction Noise and Vibration Control Plan as required by Sound Transit's general construction contract specifications. This plan will verify and provide more detail on site specific construction vibration mitigation measures. The Construction Vibration Control Plan would include Category 1 land uses and any other structures where predicted construction vibration would exceed the applicable thresholds. If pile-driving is planned

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				within 100 feet of structures, alternative methods of pile installation or vibration monitoring would be considered. Predicted vibration levels from the tunnel boring machine are below impact thresholds. If needed, options for reducing vibration from the supply train during tunneling are reducing the operation speed of the supply train, smoothing the running surface, or using rubber-tire supply train vehicles. Pre-construction surveys would be conducted to document the existing conditions of buildings, and the contractor would be responsible for repairing damage resulting from the project.
Water Resources	4.8		Long-term	<p>Sound Transit will treat all new and replaced pollution generating impervious surface (PGIS).^{1, 2}</p> <p>Sound Transit will look for opportunities to use pervious pavement, where practicable, during final design.²</p> <p>Mitigation for unavoidable impacts in the Duwamish Waterway and Longfellow Creek would be approved by the appropriate permitting agencies and jurisdictions before construction. Compensatory mitigation for this impact is described in the Ecosystems mitigation row below.</p> <p>As plans for wetland mitigation adjacent to Longfellow Creek advance, the floodplain analysis will be updated to reflect modified grading plans and determine if a rise in the base flood elevation would still occur and to confirm if additional storage capacity would be needed.</p>
			Construction	No mitigation is required.
Ecosystems	4.9	Wetlands	Long-term and Construction	<p>To the extent that permanent impacts could not be avoided to wetlands or wetland buffers (as would occur under Preferred Alternative DUW-1a, and Preferred Option DEL-6b), Sound Transit would provide compensatory mitigation to achieve no net loss of wetland function. For instance, enhancing areas currently covered in invasive plants with native vegetation would improve the ability for these wetland buffers to support wildlife. All compensatory mitigation would include a monitoring period to ensure success of the mitigation.</p> <p>Duwamish Segment</p> <p>This alternative would have permanent impacts to a wetland and its buffer. Onsite wetland buffer mitigation could be provided through native plantings or weed control in the West Duwamish Greenbelt. These mitigation actions could improve wetland buffer habitat where buffers are dominated by non-native plants or where ground cover is sparse.</p> <p>Mitigation for these impacts could occur on property adjacent to Longfellow Creek in the Delridge Segment, between Southwest Andover Street and Southwest Yancy Street, if this property is acquired for project construction for Preferred Option DEL-6b. The property provides opportunity for habitat creation and enhancement adjacent to a stream, wetlands, and a greenbelt. Sound Transit would plan this mitigation area using applicable policies and regulations and coordination with the City of Seattle.</p>

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<p>If additional mitigation is needed (or if the property between Southwest Andover Street and Southwest Yancy Street is not acquired), Sound Transit plans to use one or more of the following methods to mitigate wetland and wetland buffer impacts. The mitigation planning would follow the mitigation sequencing priorities outlined in Corps guidance or as agreed to with regulatory agencies:</p> <ul style="list-style-type: none"> • Approved In-Lieu Fee program such as the King County Mitigation Reserves Program or mitigation bank such as the Port of Seattle mitigation bank (currently in review), if available. The Port's Wetland Mitigation and Habitat Conservation Umbrella Bank Prospectus lists two new mitigation sites within about 0.5 mile of all Duwamish Segment alternatives' bridge impacts (Terminal 25 and Terminal 105), and two additional sites about 0.5 mile south, Terminal 107 and Terminal 108 (Port of Seattle and Anchor QEA 2021). • Compensatory mitigation at an advance mitigation site. • Project-specific mitigation developed by Sound Transit and approved by appropriate regulatory agencies. • Sound Transit would implement compensatory mitigation in accordance with applicable federal, state, and local requirements and guidelines. To the extent practicable wetland mitigation sites would be identified close to impacts and compensated in-kind for lost values. <p>Delridge Segment</p> <p>These alternatives would have permanent impacts to wetlands and wetland buffers. Onsite mitigation could occur on property adjacent to Longfellow Creek that would be acquired for project construction of these alternatives, between Southwest Andover Street and Southwest Yancy Street. The existing wetlands and wetland buffers along Longfellow Creek could also provide opportunities for mitigation where native plantings could improve existing wetland or buffer habitat. If additional mitigation area is needed, one of the mitigation options previously described would be applied. Sound Transit would determine final mitigation actions during final design and permitting.</p>
		Aquatic Resources	Long-term and Construction	<p>Sound Transit would provide mitigation for unavoidable impacts to benthic habitat, streams, and stream buffers protected under federal, state, and local regulations. This mitigation would address permanent impacts, as well as temporary impacts as required.</p> <p>Duwamish Segment</p> <p>The project (Preferred Alternative DUW-1a) avoids permanent in-water impacts but would have permanent impacts to regulated shoreline along the Duwamish Waterway. Shoreline impacts could receive mitigation in the form of replanting near shorelines, which could improve conditions for juvenile salmonids in the Duwamish Waterway. The appropriate permitting agencies and jurisdictions would approve mitigation for impacts on shorelines prior to construction.</p> <p>Delridge Segment</p> <p>Onsite mitigation could occur on property adjacent to Longfellow Creek between Southwest Andover Street and Southwest Yancy Street. At this location, currently paved portions of stream buffer could be changed to vegetated areas of native plants. The</p>

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<p>existing stream buffers along Longfellow Creek could also provide opportunities for mitigation where enhancement with native plantings could improve the ability of these areas to support wildlife. Plantings could also improve over-water shade to the creek, thus improving fish habitat.</p> <p>If additional mitigation is needed (or if the property between Southwest Andover Street and Southwest Yancy Street is not acquired), Sound Transit would use one or more of the following mitigation methods: approved In-Lieu Fee program, compensatory mitigation at an advance mitigation site, or project-specific mitigation developed by Sound Transit and approved by appropriate regulatory agencies.</p> <p>Sound Transit would determine final mitigation actions during final design and permitting.</p>
		Upland Vegetation and Wildlife Resources	Long-term and Construction	<p>Mitigation would be required under all alternatives for impacts on trees. Sound Transit would coordinate with the City of Seattle on tree replacement requirements. For trees permanently removed, Sound Transit will replace them or provide payment in-lieu fees in compliance with (1) governing City regulations, Seattle Department of Construction and Inspections Director's Rules, and Executive Orders, or (2) agreed upon in the West Seattle Link Extension Tree and Vegetation Management Plan. Tree replacement regulations include Seattle's Executive Order 2023-03. Current Seattle Department of Transportation replacement ratios are 3:1 for any tree removed in the Seattle right-of-way and in Seattle parks. Seattle Department of Construction and Inspections would require appropriate replacement for trees meeting the Tier 1, 2, or 3 definitions on private property. It is expected that some of the area between Southwest Andover Street and Southwest Yancy Street could be used for tree replacement.</p> <p>Duwamish Segment</p> <p>To the extent that tree impacts cannot be avoided to acreage in the West Duwamish Greenbelt, Sound Transit would provide compensatory mitigation to achieve no net loss of ecosystem function. Sound Transit would mitigate for impacts on forested vegetation using applicable policy and regulations and would coordinate with the City of Seattle on tree replacement requirements as noted above. The onsite mitigation area proposed in Section above, on currently paved area between Southwest Andover Street and Southwest Yancy Street, could be used for upland habitat replacement.</p> <p>Delridge Segment</p> <p>Similar to West Duwamish Greenbelt impacts, Sound Transit would mitigate for unavoidable impacts to greenbelt acreage along Longfellow Creek using applicable policy and regulations. As noted above, tree replacements would be coordinated with the City of Seattle. It is expected that some of the area proposed for riparian area mitigation between Southwest Andover Street and Southwest Yancy Street could be used for upland habitat replacement within the same contiguous greenbelt where the impacts would occur.</p>

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
		Federally-listed Species, Species of Concern, Priority Species, and Species of Local Importance	Long-term and construction	<p>Sound Transit will comply with the Reasonable and Prudent Measures and Terms and Conditions in the NMFS Biological Opinion, including:</p> <ul style="list-style-type: none"> Report on the progress of the action and its impact on the species addressed in this biological opinion annually after construction begins. To ensure that take is reduced to the maximum extent practicable, Sound Transit shall provide a monitoring report documenting that the extents of take described are not exceeded. This documentation must include: <ul style="list-style-type: none"> scale drawings that show the amount of new PGIS was not exceeded, a description of measures used to minimize construction lighting on the water, and a description of added stormwater treatment and the maintenance program needed to ensure its optimal function. This report is due within 6 months of completion of construction.
Energy	4.10		Long-term and Construction	No mitigation is required for operation or construction.
Geology and Soils	4.11		Long-term and Construction	No mitigation is required for operation or construction.
Hazardous and Materials	4.12		Long-term and Construction	No mitigation is required for operation or construction.
Electromagnetic Fields	4.13		Long-term and Construction	No mitigation is required for operation or construction.
Public Services, Safety, and Security	4.14		Long-term	If the project would require permanent relocation of Fire Station 36 or the Seattle Fire Department Commissary and Utility Shop, Sound Transit would work closely with fire department officials to identify a suitable property within the surrounding area and ensure operations continue with minimal impacts during relocation. Permanent relocation of Fire Station 36 and the Seattle Fire Department Commissary and Utility Shop would occur in accordance with the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 and the Sound Transit Real Property Acquisition and Relocation Policy, Procedures, and Guidelines (Sound Transit 2017).
			Construction	<p>Sound Transit would coordinate with the Seattle Fire Department on temporary relocation of Fire Station 36, if needed. Sound Transit would also coordinate with the Seattle Fire Department regarding temporary relocation of parking and the transformer at Fire Station 14 during construction.</p> <p>Sound Transit would coordinate with public service providers before and during construction to maintain reliable emergency access and alternative plans or routes to minimize delays in response times. This would include coordination with Seattle Police Harbor Patrol prior to and throughout construction at key milestones or phases where navigation conditions could change.</p>

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				Sound Transit would also coordinate with solid waste and recycling companies and schools should rerouting of collection or school bus routes need to occur.
Utilities	4.15		Long-term and Construction	No mitigation is required for operation or construction.
Historic and Archaeological Resources	4.16		Long-term	Mitigation for adverse effects to Historic and Archaeological resources is addressed in a Section 106 programmatic agreement. Where adverse effects to National Register of Historic Places (National Register)-eligible or -listed resources cannot be avoided or minimized, a Section 106 memorandum of agreement or programmatic agreement is developed through ongoing consultation to resolve adverse effects through mitigation. FTA and Sound Transit, in consultation with the Advisory Council on Historic Preservation, State Historic Preservation Officer, Tribes, and other consulting parties developed a programmatic agreement to resolve adverse effects to historic properties for the project. The programmatic agreement was executed on February 25, 2025, for the West Seattle Link Extension. Sound Transit is also addressing potential impacts to previously undocumented archaeological resources through a phased archaeological survey work plan, including pre-construction inventory work that will occur in coordination with Tribes and the State Historic Preservation Officer. This pre-construction inventory work will be phased to coordinate with property acquisition and project construction according to the process outlined in the Archaeological Survey and Inventory Plan and as stipulated in the Section 106 programmatic agreement. The agreement will include an Archaeological Treatment Plan to address the discovery of archaeological and historic resources during project activities. Should National Register-eligible properties be identified as the project advances, FTA will apply the adverse effect criteria to determine effects to resources. In summary, FTA, in coordination with Sound Transit and in consultation with the State Historic Preservation Officer, Tribes, and other consulting parties, will resolve adverse effects pursuant to the terms of the Section 106 programmatic agreement. The executed programmatic agreement and the commitments therein are conditions of this ROD and are incorporated into the definition of the Project.
			Construction	Sound Transit will implement the monitoring and inadvertent discovery plan developed as part of the programmatic agreement in consultation with the State Historic Preservation Officer and Tribes.
Parks and Recreational Resources	4.17		Long-term	<p>According to City of Seattle Ordinance 118477, City park land acquired by the project would need to be replaced with land of equivalent or better size, value, location, and usefulness. Sound Transit would continue to work with the City to identify appropriate replacement property for mitigation where park property would be permanently acquired for the West Seattle Link Extension consistent with Ordinance 118477.</p> <p>It is assumed that replacement park land in the West Duwamish Greenbelt would be purchased by Sound Transit and conveyed to the City of Seattle as agreed to by the City. However, if agreed to by the City of Seattle and consistent with Ordinance 118477, Sound Transit would provide funds for purchase of replacement property.</p>

Resource	Final EIS Section	Impact Topic	Period	Description of Mitigation for Preferred Alternative
				<p>Sound Transit would also coordinate with the Washington State Recreation and Conservation Office regarding mitigation for parks and recreation resources they have funded. Two parcels in the West Duwamish Greenbelt that could be affected received funding from this office.</p> <p>Sound Transit would work with the Pigeon Point community and the City of Seattle to identify opportunities to replace the 22nd Avenue Street-end which would displace this resource.</p>
			Construction	Restoration of park facilities is assumed to be part of the project, and Sound Transit would coordinate with the resource owner to restore temporarily disturbed parks and recreational resources after construction, consistent with clear zone requirements for trees near the guideway. During construction, pedestrian access to parks and trails would be routed to the remaining open portions of the facilities.
Section 4(f)	4.18 Appendix H		Operations and Construction	<p>Sound Transit would provide replacement park land consistent with City of Seattle Ordinance 118477 with such modifications as approved by Seattle City Council.³ Replacement park land would have similar recreational functions and characteristics and would serve the same geographic area. Sound Transit would provide improvements as necessary for property to be of equivalent recreational use as the acquired greenbelt property.</p> <p>Replacement park land would be purchased by Sound Transit and conveyed to the City of Seattle as mutually agreed to by Sound Transit and the City. However, if agreed to by the City, Sound Transit could provide funds for purchase of replacement property, demolition of any structures thereon, cleanup of any contamination and necessary improvements for property to be of equivalent use as the acquired greenbelt property.</p> <p>The temporarily impacted area would be replanted with low-growing vegetation when construction is completed, but large trees would not be allowed near the guideway.</p> <p>For trees permanently removed in the West Duwamish Greenbelt and elsewhere along the project, Sound Transit will replace them or provide payment in-lieu fees in compliance with governing City regulations, Seattle Department of Construction & Inspection Director's Rules, and Executive Orders, or agreed upon in the West Seattle Link Extension Tree and Vegetation Management Plan.⁴</p> <p>Sound Transit will provide a detour of the Delridge Connector Trail to the West Seattle Bridge Trail and associated improvements for the detour as depicted in Figure 1 (see Section 4(f) Concurrence Request dated April 15, 2024, and concurrence from City of Seattle dated April 25, 2024, in Attachment H.2 of Appendix H). This detour route and associated improvements were developed jointly by the City of Seattle and Sound Transit. As noted on Figure 1, there are several areas where the City and Sound Transit will continue to refine the detour as appropriate and as agreed to by both parties.</p> <p>Based on mutual agreement by the City and Sound Transit, Sound Transit will provide a detour for the 22nd Avenue connection to the Delridge Connector Trail and associated improvements for the detour as depicted on Figure 1.⁴</p>

¹ The light rail track/guideway is Non-Pollution Generating Impervious Surface (NPGIS) under Department of Ecology's 2019 municipal stormwater permit and manual and Pollution-Generating Impervious Surface (PGIS) under the 2024 permit and manual. However, the 2024 permit and manual are subject to a pending appeal before the Pollution Control Hearings Board.

²Section 7 ESA Consultation

³ The property replacement must comply with City Ordinance 118477, with such modifications as approved by Seattle City Council. The City may require more acres of replacement land than is converted to comply with City Ordinance 118477. The City of Seattle reserves the right to determine whether the replacement property and exchange fulfills the City's legal responsibilities and commitments to city stakeholders. The City of Seattle has the right to accept or reject property offered by Sound Transit in exchange. The City has final approval authority over any transaction that includes the loss of Seattle Parks and Recreation's land at Pigeon Point and the acceptance of new park land from Sound Transit. Sound Transit understands that the City expects Sound Transit to assume responsibility for all costs associated with the property transfer (including environmental and title due diligence, tenant relocation and building/structure demolition, remediation to Washington's Model Toxics Control Act-Method A standards prior to transfer of ownership to the City, and completion of the Washington State Recreation and Conservation Office and/or other acquisition grant-related processes). The City of Seattle's Section 4(f) concurrence does not alter Sound Transit's need to acquire necessary local, state, and federal permits or licenses and comply with all necessary local codes and rules. The City of Seattle's Section 4(f) concurrence does not limit the conditions and mitigation requirements that Seattle Parks and Recreation and other City Departments may require during permitting and approval processes.

⁴ These measures to minimize harm are mitigation for other project impacts not directly related to the activities, attributes, or features.

Appendix C

Comments Received on the Final EIS

September 20 – April 15, 2025

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Appendix C. Comments Received on the Final EIS and Responses

This appendix includes comments received on the West Seattle Link Extension Final EIS and responses to those comments when applicable. The comments and responses are provided in the following categories:

- Agencies
- Businesses and Business Organizations
- Community and Arts Organizations
- Individuals:

These are separated into the following subcategories:

- Form letters: One form letter with 19 submittals was received. The comments within these letters are summarized in a table as a representative submittal, along with corresponding responses. The table is then followed by a list of all parties that submitted that form letter in order of receipt and copies of their comment submittals.
- Substantive Comments: Substantive comments are defined in FTA’s Environmental Standard Operating Procedures (SOP) as “Comments that raise specific issues or concerns regarding the project or the study process, suggest new alternatives, or question or raise concern over new impacts not previously addressed in the DEIS or EA are considered substantive comments.” (SOP 11, Receiving and Responding to Public and Agency Comments)
- Non-substantive comments: These include comments from individuals that do not meet the above definition of “substantive”. Copies of the comments are provided, but not responses.

Comments received after April 15, 2025, are included but do not include responses.

Index of letters

Agencies:

EPA
United States Post Office
City of Seattle
NWSA and the Port

Businesses and Business Organizations:

Pacific Iron and Metal
West Seattle Junction Association
Seattle Metropolitan Chamber of Commerce
Blade Gallery
SODO BIA

Community Organizations:

Transitional Resources Board of Directors
Smarter Transit
Rethink the Link -1
Rethink the Link -2
West Seattle Bike Connections
Washington Policy Center

Form letter-Avalon Neighborhood:

Gary Reifel
Ryan Hink
Mary Ellen Cunningham
Steven Zsitvay
Chad Hembrow
Myra Ferriols
Heidi Shiningier-Forrer
Mark Forrer
Lauren Frey
Marcia Kato
Paul Haury
Robert McCall
Mary Heinze

Appendix C. Comments Received on the Final EIS and Responses

Mary Ellen Cunningham
Leah Hammack
Joyce Aoyama
Steven Zsitvay
Lucy Barefoot
Paul Haury

Individuals-Substantive (numbers indicate numbering in attachment):

I-1	Baylee Frost
I-2	Brenda Howald
I-3	Jean Anne Aguirre
I-4	Jan Roberts
I-5	Chris Karnes
I-6	Savannah Myers
I-7	Johannes Heine
I-8	Donna Popich
I-9	Beth Boomgard
I-10	John Niles
I-11	Rich Koehler
I-12	Donald Goodwin
I-13	Martin Westerman
I-14	Martin Westerman
I-15	Dan Betts
I-16	Martin Lee
I-17	Bill Hirt
I-18	Martin Westerman
I-19	Marilyn Kennell
I-20	Gale Sketchley
I-21	Clint Barefoot
I-22	Maggie Fimia
I-23	Gale Sketchley
I-24	Marilyn Kennell
I-25	Jan Roberts
I-26	Stephen Fesler
I-27	Johannes Heine
I-28	Lucy Barefoot
I-29	Martin Westerman

Appendix C. Comments Received on the Final EIS and Responses

I-30	Matthew Maciejewski
I-31	Marsha Lubetkin
I-32	Donna Corliss
I-33	Erwin Galan
I-34	Eric Fisk
I-35	Martin Westerman
I-36	L. Scot Bastian
I-37	Larry Macmillan
I-38	Barbara Greenlee
I-39	Gale Sketchley
I-40	Gale Sketchley
I-41	Gary Reifel
I-42	Candace Shattuck
I-43	None Provided
I-44	Terry Scidmore
I-45	Matthew Maciejewski
I-46	Marcy Miller
I-47	Holly M Kemery
I-48	Glenn Laubaugh
I-49	Oliver Chen
I-50	Marsha Lubetkin
I-51	Noelle Million
I-52	Tanya Hurst
I-53	Marilyn Kennell
I-54	Maren Costa
I-55	Johannes Heine
I-56	Tanya Hurst
I-57	Pamela Adams
I-58	Maureen Rogers
I-59	Martin Westerman
I-60	Nathan Rose
I-61	Gale Sketchley
I-62	Martin Westerman
I-63	Marsha Lubetkin
I-64	Corliss Gooch
I-65	Margaret Fredrick
I-66	Dan Kennedy

Appendix C. Comments Received on the Final EIS and Responses

I-67	Kirsten Whitemore
I-68	Stephen Fesler
I-69	Candace Shattuck
I-70	Christine Cranston
I-71	Michael Woodward
I-72	Martin Westerman
I-73	Martin Pagel
I-74	Jan Roberts
I-75	Jan Roberts
I-76	Jan Roberts
I-77	Jan Roberts
I-78	Kristi DuPuy
I-79	Marilyn Kennell
I-80	Diane Hamilton
I-81	Gale Sketchley
I-82	Martin Westerman, John Niles, Martin Pagel, Marilyn Kennell
I-83	Marilyn Kennell
I-84	Marie McKinsey
I-85	Sandra Braun
I-86	Donna Popich
I-87	Kirsten Whitemore
I-88	Candace Shattuck
I-89	Terry Scidmore
I-90	Jan Roberts
I-91	Chris Scullin
I-92	Jan Roberts
I-93	Jan Roberts
I-94	Jan Roberts
I-95	Marilyn Kennell
I-96	Marilyn Kennell
I-97	John McNulty and Victoria Nelson
I-98	Terry Scidmore
I-99	Marilyn Kennell
I-100	Sharon Price

Individuals-Non-substantive:

Michael Monteleone
Debora Robinett
Michael Tanner
Adam St. Denis
Gavin Yehle
Scott Smith
Blair Johnson
Dylan Hanson
Vinnu Komanapalli
Thomas Boyle
Paul Sweum
L Dong
Melissa Geraghty
James Hochstein
Blair Johnson
Conrad Cipoletti
Joe Johns
Joe Johns
John Niles
John Niles
John Niles
Keegan Walden
Martin Westerman
Patrick Robinson
Patrick Robinson

Comments received after April 15, 2025:

Mallory Lavin

Appendix C- Agency Comments

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REGION 10

SEATTLE, WA 98101

October 21, 2024

Mark Assam
Environmental Protection Specialist
Federal Transit Administration, Region 10
915 Second Avenue, Suite 3142
Seattle, Washington 98174

Dear Mark Assam:

The U.S. Environmental Protection Agency has reviewed Federal Transit Administration and Sound Transit's September 2024 Final Environmental Impact Statement for the West Seattle Link Extension Project (CEQ Number 20240168, EPA Project Number 19-0002-FTA). The EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA and requires the EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The FEIS evaluates the environmental impacts of a proposal to expand Link light rail transit service along a 4.1-mile corridor from SODO (South of Downtown) to West Seattle in the City of Seattle, King County, Washington. This FEIS focuses on the West Seattle Link Extension while the January 2022 Draft EIS included both West Seattle and Ballard Link Extensions. The DEIS clarified the two extensions will operate as separate lines and are standalone projects with independent utility. After the DEIS public review, Sound Transit and FTA determined that the NEPA process for the two extensions should continue separately since the projects are now on different schedules. Due to additional needed conceptual engineering and analyses, the FTA will publish a new Notice of Intent for the Ballard Extension. The FEIS includes a No Build Alternative and multiple Build Alternatives in the West Seattle Link Extension project corridor, divided into four smaller geographic areas: the SODO (SODO), Duwamish (DUW), Delridge (DEL), and West Seattle Junction (WSJ) segments. The FEIS identifies the following four segments as Preferred: Preferred At-Grade Lander Access Station Option (SODO-1c), Preferred South Crossing Alternative (DUW-1a), Preferred Andover Street Station Lower Height South Alignment Option (DEL-6b), and Preferred Medium Tunnel 41st Avenue Station West Entrance Station Option (WSJ-5b). The EPA notes that the FEIS indicates the Sound Transit Board will not make a final decision on the project to be built until after completion of the FEIS, and at that time, the Board can select from any of the FEIS alternatives.

The EPA recognizes that regional public transit has an important role in reducing vehicle miles traveled and vehicle emissions in an area with heavy traffic congestion. Related to the West Seattle Link Extension, the EPA provided April 2022 DEIS recommendations on Superfund sites within the Duwamish segment of the Proposed Action, government-to-government consultation and coordination with Tribes, environmental justice, the West Duwamish Greenbelt great blue heron rookery, and preferred alternatives with third-party funding.

The EPA appreciates that the FEIS addresses several of our DEIS comments. In reviewing the FEIS, the EPA identified remaining environmental quality concerns and is providing the following recommendations for the Record of Decision (ROD):

- Superfund Sites in the Duwamish Segment: The EPA appreciates that Preferred Alternative DUW-1a avoids in-water placement of the guideway columns. The EPA prefers that the selected alternative's guideway columns are installed on land versus in the waterway, especially the East Waterway, due to the presence of contaminated sediment. For activities in the project's Duwamish segment, to further avoid and minimize potential impacts to Superfund sites, the EPA recommends the ROD commit to:
 - Coordinating reviews of applicable Construction Access Traffic Management Plans and Work Specific Construction Plans (e.g., use of all temporary work trestles and coffer dams, including construction best management practices [BMPs] and dewatering protocols) with the EPA. Please contact Ravi Sanga (sanga.ravi@epa.gov, 206-553-4092), the Remedial Project Manager for East Waterway and Harbor Island, and Elly Hale (hale.elly@epa.gov, 206-553-1215), the Remedial Project Manager for Lower Duwamish.
 - Stockpiling, testing, and disposing of all soils from Harbor Island appropriately. Ensuring all vehicles are subject to a wheel wash to ensure any potentially contaminated material is not spread outside the Harbor Island Superfund site.
 - Requiring appropriate stockpiling, testing, and disposal for all sediments for East Waterway Operable Unit, if applicable.
 - Preventing construction material or debris from falling into the waterway, especially East Waterway, when constructing overhead bridges. Also, providing additional information on the use of scaffolding and netting under the bridge¹ and how their use may affect banks or the near shore waterway.
 - Acknowledging the Harbor Island East Waterway Operable Unit Interim ROD was signed May 18, 2024.
- Subsistence and Recreational Fishing: The EPA recommends continued coordination with Tribes regarding impacts to treaty-protected fishing rights and access to Usual and Accustomed Areas. Ensure potential impacts to subsistence and recreational fishing (e.g., temporary fishing site access restrictions, prohibitions to fish consumption, etc.) are effectively communicated with Tribal, subsistence, and recreational fishers that utilize the Spokane Street Bridge and other popular areas on the Duwamish Waterway in proximity to the proposed project.
- Longfellow Creek: The EPA appreciates the FEIS includes aquatic resources/wetland mitigation

¹ Use of scaffolding and netting for construction is referenced under Section 3.11.3.6 Navigation (FEIS, p. 3-69) and Section 4.3.5.3.1 Potential Impacts on Businesses and Freight (FEIS, p. 4.3-18).

along Longfellow Creek, an urban stream with documented elevated levels of pre-spawn mortality for coho salmon,² experiencing acute toxicity to the pollutant 6PPD-quinone from stormwater runoff.³ The EPA requests receiving a courtesy copy of the compensatory mitigation plan when submitted to the U.S. Army Corps of Engineers during the Clean Water Act Section 404 permitting process.

In the event the FTA selects a different build alternative in the Duwamish segment as the Preferred Alternative in the ROD, the EPA recommends coordinating with the EPA Region 10 Superfund Program to ensure that the selected bridge design, construction methods, and BMPs are compatible with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) decisions and remedy implementation for the East Waterway Operable Unit of the Harbor Island Superfund Site.

Thank you for the opportunity to review the FEIS for this project. If you have questions about this review, please contact Susan Sturges of my staff at 206-553-2117 or at sturges.susan@epa.gov, or me, at 206-553-6387 or at baca.andrew@epa.gov.

Sincerely,

Andrew J. Baca
Deputy Director
Environmental Justice, Community Health, and
Environmental Review Division

cc: Lauren Swift, Central Corridor Environmental Manager, Sound Transit

² (FEIS, p. 4.9-5 and Appendix I Mitigation Plan).

³ A 2021 scientific publication funded by the EPA Region 10's Puget Sound Geographic Program demonstrated that 6PPD-quinone is acutely toxic to coho salmon. See <https://www.science.org/doi/10.1126/science.abd6951>. Accessed 10/8/2024.

Appendix C. Comments Received on the Final EIS and Responses

United States Environmental Protection Agency

#	Comments	Responses
1	<p>Superfund Sites in the Duwamish Segment: The EPA appreciates that Preferred Alternative DUW-1a avoids in-water placement of the guideway columns. The EPA prefers that the selected alternative's guideway columns are installed on land versus in the waterway, especially the East Waterway, due to the presence of contaminated sediment. For activities in the project's Duwamish segment, to further avoid and minimize potential impacts to Superfund sites, EPA recommends the ROD commit to:</p> <ul style="list-style-type: none"> o Coordinating reviews of applicable Construction Access Traffic Management Plans and Work Specific Construction Plans (e.g., use of all temporary work trestles and coffer dams, including construction best management practices [BMPs] and dewatering protocols) with the EPA. Please contact Ravi Sanga (sanga.ravi@epa.gov, 206-553-4092), the Remedial Project Manager for East Waterway and Harbor Island, and Elly Hale (hale.elly@epa.gov, 206-553-1215), the Remedial Project Manager for Lower Duwamish. o Stockpiling, testing, and disposing of all soils from Harbor Island appropriately. Ensuring all vehicles are subject to a wheel wash to ensure any potentially contaminated material is not spread outside the Harbor Island Superfund site. o Requiring appropriate stockpiling, testing, and disposal for all sediments for East Waterway Operable Unit, if applicable. o Preventing construction material or debris from falling into the waterway, especially East Waterway, when constructing overhead bridges. Also, providing additional information on the use of scaffolding and netting under the bridge and how their use may affect banks or the near shore waterway. o Acknowledging the Harbor Island East Waterway Operable Unit Interim ROD was signed May 18, 2024. 	<p>Please see Section 4.12.5, Environmental Impacts of the Build Alternatives during Construction, of the Final West Seattle Link Extension Environmental Impact Statement (EIS), which discusses coordination with EPA during construction in the area of Superfund sites and the handling and disposal of potentially contaminated soils. Regulatory requirements and best management practices that would be implemented are not considered mitigation measures and therefore have not been added to the ROD.</p> <p>For construction in the Duwamish Waterway, please see Section 3.11.3.6, Navigation, of the Final EIS, which states that Sound Transit would develop a construction navigation management plan. This mitigation is included in the ROD.</p> <p>Sound Transit acknowledges that the Harbor Island East Waterway Operable Unit Interim ROD was signed on May 18, 2024. However, this information is not necessary to add to the West Seattle Link Extension ROD. Sound Transit intends to coordinate with the EPA and Washington State Department of Ecology (Ecology) regarding work within the Harbor Island Superfund Site as design advances.</p>
2	<p>Subsistence and Recreational Fishing: The EPA recommends continued coordination with Tribes regarding impacts to treaty-protected fishing rights and access to Usual and Accustomed Areas. Ensure potential impacts to subsistence and recreational fishing (e.g., temporary fishing site access restrictions, prohibitions to fish consumption, etc.) are effectively communicated with Tribal, subsistence, and recreational fishers that utilize the Spokane Street Bridge and other popular areas on the Duwamish Waterway in proximity to the proposed project.</p>	<p>Please see Section 4.3, Economics, of the Final EIS for mitigation related to Tribal treaty-protected fishing rights and access to the Usual and Accustomed Areas. This mitigation is included in the ROD. Project construction would not affect access from public fishing locations.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
3	<p>Longfellow Creek: The EPA appreciates the FEIS includes aquatic resources/wetland mitigation along Longfellow Creek, an urban stream with documented elevated levels of pre-spawn mortality for coho salmon, experiencing acute toxicity to the pollutant 6PPD-quinone from stormwater runoff. The EPA requests receiving a courtesy copy of the compensatory mitigation plan when submitted to the U.S. Army Corps of Engineers during the Clean Water Act Section 404 permitting process.</p>	<p>The Clean Water Act Section 404 permitting process is not a mitigation measure because it is a regulatory requirement and therefore, has not been added to the ROD. Sound Transit will provide a copy of the compensatory mitigation plan for Longfellow Creek to EPA.</p>
4	<p>In the event the FTA selects a different build alternative in the Duwamish segment as the Preferred Alternative in the ROD, the EPA recommends coordinating with the EPA Region 10 Superfund Program to ensure that the selected bridge design, construction methods, and BMPs are compatible with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) decisions and remedy implementation for the East Waterway Operable Unit of the Harbor Island Superfund Site.</p>	<p>Sound Transit will continue to coordinate with EPA during final design and construction of the West Seattle Link Extension.</p>

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October 18, 2024

Sound Transit
Board of Directors
401 S Jackson Street
Seattle WA 98104-2826

Subject: Property at 2460 4th Ave S;
King County Parcel Number 7666204395

Dear Board Members.

The United States Postal Service (USPS) is in receipt of the WSLE Final Environmental Impact Statement (EIS) which includes the alternatives studied in the WSBLE Draft EIS plus cost savings and refinement concepts identified in the July 2022 Board Motion.

USPS has been informed that its property may be affected by one or more of the alternatives in the Final EIS.

Prior to the Board considering action and selecting the project to be built with anticipation of the issuing the Record of Decision USPS requests that prior to the design phase the following issues be considered.

Problem Statement

Sound Transit's Final Environmental Impact Statement (EIS) fails to provide adequate information and designs on how the construction of the West Seattle Link Extension will impact the United States Postal Service's operations located at 2460 4th Ave S, Seattle, WA 98134. Further, the U.S.

Background

With the publication of the Final EIS for the West Seattle Link Extension, the project has now reached the 30% design benchmark. The Final EIS is an important document that dictates how the project is expected to impact the environment (built and natural), respond to public concerns, assess and describe impacts, and provide reasonable discussions around mitigation. Sound Transit's Board of Directors will potentially select the project to be built on October 24, 2024. The Federal Transit Administration (FTA) is anticipated to issue a Record of Decision before the end of 2024, likely in support of building the project. From there, Sound Transit will have the authority to begin property acquisition, finish design, conduct additional engineering, seek permits, and enter into contracts for additional project elements. Once the FTA issues a Record of Decision, the project will pick up pace

with construction slated to begin in 2027 with some elements potentially starting sooner. Sound Transit's goal is to have the new line completed in 2032.

Geographic Context

The U.S. Postal Service facility is located in SODO, or South of Downtown, an industrial district in Seattle, Washington. With the Port of Seattle to the west, I-5 to the east, I-90 to the north, and large rail facilities throughout, SODO houses many logistics and freight operations. SODO has five main north-south arterials (East Marginal Way S, 1st Avenue S, 4th Avenue S, 6th Avenue S, and Airport Way S) and three main east- west connectors (S Holgate Street, S Lander Street, and S Spokane Street). An existing light rail station is already present along the SODO Busway, which abuts U.S. Postal Service facilities, and the West Seattle Link Extension will add a new line connecting the southwestern quadrant of the City of Seattle to the regional passenger rail system.

Potential Concerns for Postal Service Operations

Below is a list of the potential concerns provided by the U.S. Postal Service. There is an exhibit from Sound Transit at the end of this document and is provided for additional context.

New Overpass on S Lander Street

- Sound Transit is proposing a new overpass to be built between 4th Avenue S and 6th Avenue S along S Lander Street, where the U.S. Postal Service has its main access to the garage. This also serves as the main entrance for the U.S. Postal Service's freight operations.
- The Final EIS states, "During construction of the South Lander Street overpass, access from the United States Postal Service facility would be maintained at their southern access point, except for short durations over nights and weekends. However, pedestrian access to the United States Postal Service garage from South Lander Street would be closed during construction of this roadway overpass. The majority of the United States Postal Service access road interruptions are anticipated to occur over a 1.5-year period" ([Chapter 4](#), page 4.14-12).

Potential Issues

- There are no specific designs provided in the Final EIS.
- We are unable to ascertain if the bridge can be constructed with dimensions that will retain access to the U.S. Postal Service's garage and meet design standards.
- Preliminary conversations have suggested Sound Transit would raise the intersections at 4th Avenue S and 6th Avenue S to make the overpass buildable, though the Final EIS does not discuss this.
- The eastern half of the existing overpass on S Lander Street near 3rd Avenue S will also need to be redone, suggesting potential closures for that overpass as well.
- Sound Transit states that the U.S. Postal Service will retain access to the southern entrance via a new access road. See the point regarding the access road for more

information.

- There will be a pedestrian facility to access the light rail station between the overpass and the U.S. Postal Service's facilities, creating a long, narrow corridor with little visibility. Public safety for transit users and U.S. Postal Service employees is a top concern along this corridor.

Access Road

- Due to the overpass, Sound Transit states in the Final EIS, "Alternative access to this garage would be provided on 4th Avenue South. Sound Transit is working with the United States Postal Service and the City of Seattle to ensure trucks and other vehicles are able to access the parking garage facility" ([Chapter 3](#), pages 3-19 and 3-20).

Potential Issues

- No specific designs are provided as a part of the Final EIS.
- Based off the schematic in [Appendix J, part 1 on page 11](#), the geometry of the proposed access road appears to be incompatible with some truck turning movements.
- The access road would have an uncontrolled intersection with 4th Avenue S, a very busy arterial, which is set to be reworked (see concern related to 4th Avenue S below).

Unspecified Changes to 4th Ave S

- The SODO Busway (along the U.S. Postal Service facility's east side) will be permanently closed, likely redirecting all buses to 4th Avenue S. There will be anywhere between 1,440 and 1,920 buses using 4th Avenue S every day during construction. There will be an unknown number of buses when the project is complete.
- The Final EIS states, "The mitigation measures being considered include transit queue jumps, business access and transit lanes, and freight and bus lanes. Specific mitigation for the permanent closure of the SODO Busway would be determined through coordination between Sound Transit, City of Seattle, Port of Seattle, Northwest Seaport Alliance, and King County Metro" ([Appendix N](#), part 1, page 4-26).

Potential Issues

- The specific mitigation methods have not been determined, meaning impacts on the U.S. Postal Service and other entities along the 4th Avenue S corridor are largely undefined.
- Construction and sequencing of this project is undefined despite Sound Transit officials stating that buses would be relocated to 4th Avenue S in 2027, suggesting the changes to 4th Avenue S would occur prior to 2027.
- Given the potential mitigation methods, Sound Transit would likely trigger mandatory improvements, such as planting street trees, replacing roadway

concrete, and redoing sidewalks, adding impacts and complexity beyond what is included in the Final EIS.

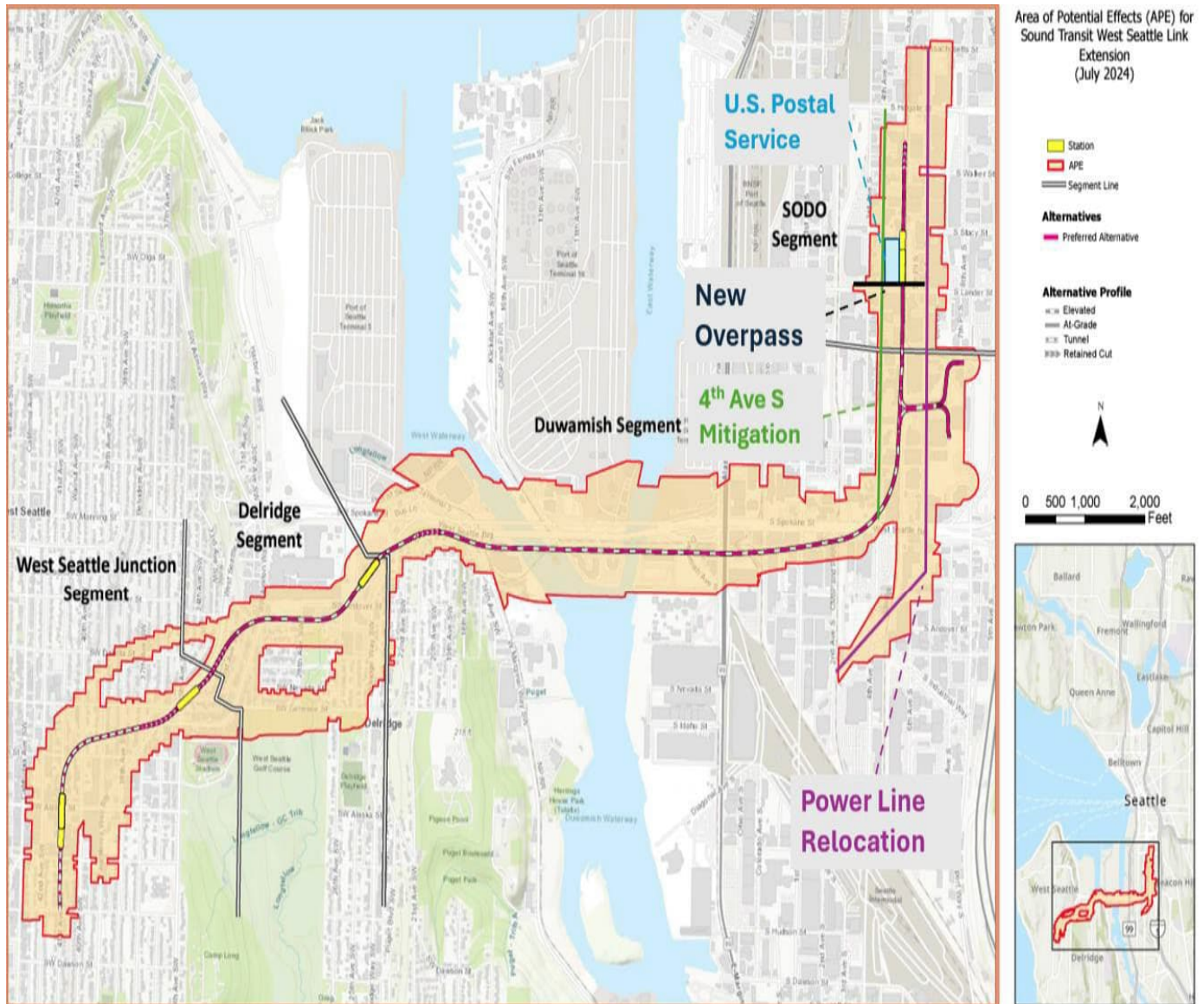
- Without a specific mitigation plan in order, the impacts from and interactions between 4th Avenue S and S Lander Street cannot be determined.

The United States Postal Services' mission is to provide essential services and is a critical part of the nation's infrastructure, delivering essential services to American households and businesses.

Please consider the concerns raised in this letter moving forward with the Board's decision on the final plans.

Respectfully,

E-SIGNED by LETITIA Y RUSSELL
on 2024-10-18 20:05:03 GMT
Letitia
Manager, Realty Asset Programs



Appendix C. Comments Received on the Final EIS and Responses

United States Postal Service

#	Comments	Responses
1	<p>New Overpass on S Lander Street</p> <ul style="list-style-type: none"> • Sound Transit is proposing a new overpass to be built between 4th Avenue S and 6th Avenue S along S Lander Street, where the U.S. Postal Service has its main access to the garage. This also serves as the main entrance for the U.S. Postal Service's freight operations. • The Final EIS states, "During construction of the South Lander Street overpass, access from the United States Postal Service facility would be maintained at their southern access point, except for short durations over nights and weekends. However, pedestrian access to the United States Postal Service garage from South Lander Street would be closed during construction of this roadway overpass. The majority of the United States Postal Service access road interruptions are anticipated to occur over a 1.5-year period" (Chapter 4, page 4.14-12). <p>Potential Issues</p> <ul style="list-style-type: none"> • There are no specific designs provided in the Final EIS. • We are unable to ascertain if the bridge can be constructed with dimensions that will retain access to the U.S. Postal Service's garage and meet design standards. • Preliminary conversations have suggested Sound Transit would raise the intersections at 4th Avenue S and 6th Avenue S to make the overpass buildable, though the Final EIS does not discuss this. • The eastern half of the existing overpass on S Lander Street near 3rd Avenue S will also need to be redone, suggesting potential closures for that overpass as well. • Sound Transit states that the U.S. Postal Service will retain access to the southern entrance via a new access road. See the point regarding the access road for more information. • There will be a pedestrian facility to access the light rail station between the overpass and the U.S. Postal Service's facilities, creating a long, narrow corridor with little visibility. Public safety for transit users and U.S. Postal Service employees is a top concern along this corridor. 	<p>Preferred Option SODO-1c has a staggered station configuration that was developed to avoid property owned by the United States Postal Service (USPS) at 4th Avenue South and South Lander Street. Please see Appendix J of the Final EIS for conceptual design drawings. Please see Sections 4.14, Public Services, Safety, and Security, and 3.10, Affected Environment and Impacts During Operation – Freight Mobility and Access, of the Final EIS for more information on impacts to this facility and impacts to freight from the Lander Street overpass. Safety impacts are discussed in Section 3.8, Affected Environment and Impacts During Operation – Safety. Sound Transit will continue to coordinate with USPS and the City of Seattle regarding the overpass design to meet USPS requirements and city design standards.</p> <p>Consistent with the State Environmental Policy Act, this West Seattle Link Extension Final EIS provides the public and decision makers with information about the West Seattle Link Extension "at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified" (Washington Administrative Code [WAC] 197-11-055(2)). This is also consistent with the National Environmental Policy Act (NEPA), which provides that "Agencies shall integrate the NEPA process with other planning at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts" (40 Code of Federal Regulations 1501.2). This EIS has been prepared using approximately 10 to 15 percent level of design. This level of design allows for meaningful evaluation of alternatives, impacts, and potential mitigation measures. As noted in several places in this Final EIS, after a decision has been made to select the project to be built, the project would undergo additional engineering and design and mitigation measures would be refined.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
2	<p>Access Road</p> <ul style="list-style-type: none">• Due to the overpass, Sound Transit states in the Final EIS, “Alternative access to this garage would be provided on 4th Avenue South. Sound Transit is working with the United States Postal Service and the City of Seattle to ensure trucks and other vehicles are able to access the parking garage facility” (Chapter 3, pages 3-19 and 3-20). <p>Potential Issues</p> <ul style="list-style-type: none">• No specific designs are provided as a part of the Final EIS.• Based off the schematic in Appendix J, part 1 on page 11, the geometry of the proposed access road appears to be incompatible with some truck turning movements.• The access road would have an uncontrolled intersection with 4th Avenue S, a very busy arterial, which is set to be reworked (see concern related to 4th Avenue S below).	<p>See response to comment 1 regarding the level of design provided in the Final EIS. Sound Transit will continue to coordinate with USPS regarding the access road.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
3	<p>Unspecified Changes to 4th Ave S</p> <ul style="list-style-type: none"> • The SODO Busway (along the U.S. Postal Service facility's east side) will be permanently closed, likely redirecting all buses to 4th Avenue S. There will be anywhere between 1,440 and 1,920 buses using 4th Avenue S every day during construction. There will be an unknown number of buses when the project is complete. • The Final EIS states, "The mitigation measures being considered include transit queue jumps, business access and transit lanes, and freight and bus lanes. Specific mitigation for the permanent closure of the SODO Busway would be determined through coordination between Sound Transit, City of Seattle, Port of Seattle, Northwest Seaport Alliance, and King County Metro" (Appendix N, part 1, page 4-26). <p>Potential Issues</p> <ul style="list-style-type: none"> • The specific mitigation methods have not been determined, meaning impacts on the U.S. Postal Service and other entities along the 4th Avenue S corridor are largely undefined. • Construction and sequencing of this project is undefined despite Sound Transit officials stating that buses would be relocated to 4th Avenue S in 2027, suggesting the changes to 4th Avenue S would occur prior to 2027. • Given the potential mitigation methods, Sound Transit would likely trigger mandatory improvements, such as planting street trees, replacing roadway concrete, and redoing sidewalks, adding impacts and complexity beyond what is included in the Final EIS. • Without a specific mitigation plan in order, the impacts from and interactions between 4th Avenue S and S Lander Street cannot be determined. 	<p>See response to comment 1 regarding the level of design provided in the Final EIS. Mitigation for the SODO Busway was developed in coordination with King County Metro Transit and the City of Seattle. Specific mitigation for the permanent closure of the SODO Busway would be determined through coordination between Sound Transit, City of Seattle, Port of Seattle, Northwest Seaport Alliance (NWSA), and King County Metro Transit.</p>



October 18, 2024

Via email

Susan Fletcher
susan.fletcher@dot.gov
Regional Administrator
Federal Transit Administration, Region 10

Lauren Swift
lauren.swift@soundtransit.org
Central Corridor Environmental and Business Operations Manager
Sound Transit

Dear Ms. Fletcher and Ms. Swift,

The City of Seattle (City) has reviewed the West Seattle Link Extension (WSLE) Final Environmental Impact Statement (FEIS) published on September 20, 2024, and appreciates Sound Transit's review and responses to the City's comments on the Administrative Draft Environmental Impact Statement (ADEIS) and Draft Environmental Impact Statement (DEIS). The City enthusiastically supports the WSLE project and the Preferred Alternative identified in the FEIS. As a cooperating agency under the National Environmental Policy Act (NEPA), an agency with jurisdiction under the State Environmental Policy Act (SEPA), and an Authority Having Jurisdiction (AHJ), and in support of our 2018 Partnering Agreement with Sound Transit, the City takes this opportunity to provide comments on the FEIS.

Sound Transit must satisfy all applicable federal, state, and local environmental regulations—including the City's codes, regulations, policies, and permitting requirements, including SEPA.¹ Consistent with the Partnership Agreement Section 6.1, and City and State SEPA law, the City intends to use and rely on Sound Transit's WSLE FEIS and Record of Decision (ROD) to satisfy the City's SEPA responsibilities.² The City retains its legal authority under SMC 25.05.600(C) to require further environmental analysis and impose additional mitigation during permitting if necessary for the City to comply with its own laws and with SEPA.³

Some project details and impacts were not known at the time of the WSLE FEIS. After the Sound Transit Board selects the project to be built, engineering, design, and mitigation measures will be refined. "Specific mitigation measures would be developed during the final design, and permitting phases and process would be coordinated with [the City]."⁴ Sound Transit has committed to coordinate with the City "throughout the development of the West Seattle Link Extension Final EIS, final design and construction."⁵ The City and Sound Transit will continue to work together to ensure the project and

¹ See, e.g., WSLE FEIS at ES-27, 4-2, 7-7 (Table 7-1); Sound Transit Resolution R2024-11 (System Expansion Project Scope and Betterments Policy) at § 2.4.1, § 2.4.2.

² See SMC 25.05.600 (when to use existing environmental documents); WAC 197-11-600 (same).

³ The WSLE FEIS may not fulfill the City's SEPA responsibilities when (1) there are substantial project changes likely to have adverse environmental impacts, (2) new information indicates a probable significant adverse material impact, (3) the City's DEIS comments were not fully addressed, (4) the FEIS does not address a Seattle SEPA factor, or (5) a project component does not comply with City requirements. SMC 25.05.600(C).

⁴ See, e.g., WSLE FEIS at 7-5 (Table 7-1).

⁵ See WSLE FEIS Appendix O.2.2: Response to City Comments (multiple); see also WSLE FEIS at 4.9-9 (tree removal), 4.15-3 (utilities), 7-13 (station access, construction management plans).

proposed mitigation meets current City laws, regulations, and policies. The mitigation that the City imposes during permitting may be different and more specific than that articulated in the WSLE FEIS.⁶ Areas requiring ongoing attention where the City must apply or amend governing codes and regulations that apply to Sound Transit's light rail project include noise code, tree loss mitigation, and guideway treatment as pollution generating under stormwater regulations. All City-imposed conditions and mitigation will be reasonable and proportionate to the project's specific, adverse environmental impacts; consistent with the City's codes, regulations, policies, and permitting requirements; and therefore not be a betterment under Sound Transit's recently updated Scope Control and Betterments Policy.⁷

Areas of Continued City-Sound Transit Collaboration

The City provides the following comments to highlight areas requiring ongoing collaboration to reach resolution as the project moves to final design and permitting. With these comments, the City is not requesting changes to the WSLE FEIS or the ROD; however, the City will apply its codes, regulations, policies, and permitting requirements and will require project impacts to be analyzed and mitigated through final design and permitting. The City reaffirms its strong commitment to advance the project through code amendments, permitting, construction, and final delivery. The City reserves the right to supplement these comments in the future if further review of the WSLE FEIS reveals additional concerns.

1. Racial Equity And Environmental Justice

The City is committed to supporting Sound Transit in achieving our shared goal of advancing equitable outcomes with our programs and investments in accordance with the City's Race and Social Justice Initiative and the requirements of Title VI of the Civil Rights Act of 1964. The City remains concerned about project impacts to Black, Indigenous, People of Color (BIPOC) communities, low-income communities, and other communities who have been historically marginalized. While WSLE will bring significant benefits and the "distribution of [environmental] impacts to minority and low-income populations would be similar to the distribution of impacts to the general population,"⁸ environmental impacts on individuals and communities will be experienced differently given the unique needs and situations of who is impacted. As WSLE moves forward into final design, the City encourages Sound Transit to continue to engage environmental justice communities in conversations around impacts and mitigation to ensure equitable outcomes across the many communities who have been historically marginalized for decades by transportation decisions and government planning. The City offers our continued partnership with Sound Transit to develop and implement the Racial Equity Toolkit (RET); apply the outcomes of the RET; and conduct robust, inclusive community engagement for both WSLE and the Ballard Link Extension (BLE) projects.

2. Construction

The City is concerned about the WSLE project's construction impacts, the sequencing of construction activity, anticipated and unanticipated cumulative impacts from Sound Transit and other construction projects Citywide, and construction impacts on Environmental Justice communities (particularly the

⁶ See, e.g., WSLE FEIS at ES-27, 7-5 (Table 7-1).

⁷ See Sound Transit Resolution R2024-11 (System Expansion Project Scope and Betterments Policy).

⁸ WSLE FEIS Appendix G: Environmental Justice at Table 5-2 (multiple).

Delridge corridor). As such, the City appreciates Sound Transit’s commitment to creating Construction Access and Traffic Management Plans, Maintenance of Traffic Plans, Construction Management Plans, Construction Transit Operations Plans, and Construction Worker Parking Plans.⁹ The City will work closely with Sound Transit to ensure these plans include significant details and adhere to City standards and requirements.¹⁰

The City has reviewed Sound Transit’s high-level construction scenarios and transportation-related mitigation measures, including “mitigation measures that are being considered for specific locations” in Appendix I: Mitigation Plan.¹¹ The City has concerns about aspects of the proposed construction scenarios, particularly the potential for simultaneous arterial and local roadway closures and timing the SODO Busway closure prior to other 4th Avenue South construction. The City’s permitting authority includes applying its SEPA policy goals to “minimize or prevent adverse traffic impacts that would undermine the stability, safety, and/or character of a neighborhood or surrounding areas.”¹² The City will consider the circulation and flow of all modes across the transportation system including vehicles, buses, cyclists and pedestrians; collisions; and safety when it evaluates the plans and construction scenarios.¹³

Sound Transit and the City must work together to minimize closures, develop detours for impacted travelers across all modes to the City’s Minimum Acceptable Mobility Standards, and ensure 24/7 emergency access for Seattle Police and Seattle Fire Departments. Early coordination on construction scenarios, proposed mitigation, and plans to ensure compliance with City regulations and policies is critical to permit streamlining and processing.¹⁴ The final construction scenarios, mitigation measures, and plans approved by the City may differ from those presented in the WSLE FEIS. As project design and permitting moves forward, (1) the City requests that the Duwamish Trail Connection from W Marginal Way to the West Seattle Bridge on SW Marginal Place be rerouted during construction and (2) the City will apply its updated 2024 Seattle Traffic Control Manual.¹⁵

3. TRANSPORTATION

There will be numerous permanent impacts on the City’s traffic and transportation environment, including impacts to current and future transit services, local and arterial streets, parking, pedestrian and bicycle facilities, freight, and safety. WSLE project impacts to the City transportation network must comply with the City’s permitting requirements, including the specific policies, procedures, and guidance.¹⁶ The City and Sound Transit have worked together on transportation issues through the Preliminary Permitting Plan and pre-permitting conversations and will continue to work together to

⁹ See WSLE FEIS at 3-85, 3-88, 3-89, 4.3-22.

¹⁰ See e.g., FHA Manual on Uniform Traffic Control Devices for Streets and Highways (referenced in WSLE FEIS at 3-85), Seattle Traffic Control Manual (updated in 2024), City’s Minimum Acceptable Mobility Standards, SDOT Director’s Rule 01-2017 Right-of-Way Opening and Restoration Rule.

¹¹ See, e.g., WSLE FEIS Appendix I: Mitigation Plan at I-9.

¹² See SMC 25.05.675.R.2.a.

¹³ See SMC 25.05.444.B.3; SMC 25.05.675.R.2.b.

¹⁴ WSLE FEIS Appendix I: Mitigation Plan at I-1.

¹⁵ Available at

https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/2024_Traffic_Control_Manual.pdf.

¹⁶ See SDOT Director’s Rule 01-2017 Right-of-Way Opening and Restoration Rule, SDOT’s Right-of-Way Improvements Manual, City of Seattle Standard Plans and Specifications, SDOT Director’s Rule 10-2015 Pedestrian Mobility In and Around Work Zones, and SDOT 2024 Traffic Control Manual for In-Street Work.

balance safety and equity as the design progresses. The City's strategies and priorities to address safety and equity include reducing vehicle speeds to increase safety, making safety investments where fatal and serious injury collisions occur most often or are at a higher risk of occurring, providing adequate space for people accessing and waiting for transit, providing safer routes to transit, and making all journeys safer. The City highlights three areas where safety concerns require further design refinement:

- **Permanent closure of SODO Busway.** Sound Transit's proposed closure of the SODO Busway and permanent detour of all transit trips to 4th Avenue South is an adverse impact that includes increased pedestrian activity on this freight corridor. Collaboration on mitigation measures is ongoing. The City's pedestrian and multimodal safety analysis have informed the proposed mitigation (e.g., different road channelization, increased sidewalk widths) and is grounded in the City's SEPA substantive authority for traffic and transportation¹⁷ and SDOT's Vision Zero commitment. Further, the City is conducting a pavement deterioration analysis to determine the impact of the significant increase in buses to 4th Avenue South paving. The City will continue to work with Sound Transit and King County Metro on design-specific mitigation related to construction and operations for the permanent closure of the SODO Busway.¹⁸ The City encourages Sound Transit and King County Metro to explore moving nonrevenue transit trips off 4th Avenue South and evaluate a new signal or other traffic modifications to facilitate the movement of nonrevenue buses off 4th Avenue South.
- **Freight Crossings in Public Right of Way.** Seattle is a City of the First Class and is the responsible agency to discuss and negotiate with railroads (BNSF and UP) regarding crossing additions or alterations in or along public right of way within the City Limits. Sound Transit must include the City in communications with the railroads regarding rail crossings (whether at-grade or grade-separated) that are in public right of way.
- **Station Footprint at 35th Ave SW and Fauntleroy Way SW.** In the WSLE FEIS, Sound Transit proposed an Avalon station design that extends into the existing operational footprint of 35th Ave SW and Fauntleroy Way SW ROW, displacing the northbound travel lane which accommodates significant AM peak period traffic volumes, including freight, and raising pedestrian safety concerns.¹⁹ The City acknowledges this design will evolve and looks forward to continued coordination on design refinements at this critical intersection.

4. ACQUISITIONS, DISPLACEMENTS, AND RELOCATIONS: BUSINESSES AND RESIDENTS

Sound Transit's Preferred Alternative minimizes residential and business impacts, including impacts to maritime businesses.²⁰ Sound Transit provides robust mitigation to residential and business property owners and tenants in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and Sound Transit's Real Property Acquisition and Relocation Policy, Procedures, and Guidelines.²¹ The City understands Sound Transit's commitment to treat owners uniformly and equitably as required under State and Federal law and Sound Transit policies. The impacts of displacement vary by each individual business and family that is displaced by this project, and their needs for relocation and for support will each be different.

¹⁷ SMC 25.05.675.R (SEPA Traffic and transportation), SMC 25.05.444.B.3 (built environment transportation elements).

¹⁸ WSLE FEIS at 3-23, 3-28, 3-87, Appendix O.2.2: Response to City Comments Attachment A Comment 1113.

¹⁹ See WSLE FEIS Appendix J: Conceptual Design Drawings (e.g., Part 2, page W05-ASP500).

²⁰ WSLE FEIS at 4.3-11 to 4.3-14 (maritime industry impacts).

²¹ WSLE FEIS at 4.14-14.

Numerous City stakeholders—including business and residential property owners and tenants—have communicated their serious concerns about project impacts. As Sound Transit moves forward in the process, the City encourages Sound Transit to consider the following approaches.

- Sound Transit should continue to engage property owners, homeowners, and business and residential tenants with up-to-date information on project impacts to their interests.
- Sound Transit should proactively share transparent information about acquisition and relocation as soon as possible. Sound Transit’s communication should be clear about Sound Transit’s process, timeline, level, and type of financial assistance.
- Sound Transit should continue to engage environmental justice communities in conversations around mitigation to ensure equitable outcomes across the many communities who have been historically marginalized for decades by transportation decisions and government planning.
- Sound Transit should provide robust mitigation for residential and business temporary and permanent displacements that is developed through direct engagement with affected owners and tenants; tailored to the unique, individual characteristics of the displaced resident or business; and focused on communities experiencing severe disruption during construction and minority and low-income individuals and communities.
- For **residents**, relocation efforts should consider place-based social connections; distance from schools, employment, and important social services; the Delridge community; and opportunities for residents to remain in the same community.
- For **businesses**, mitigation measures can include early consultation, avoiding displacement when possible, and assistance to nearby businesses that experience finance loss and challenges during extended construction timeframes. The City encourages Sound Transit to contact and communicate with existing business organizations and associations in directly impacted neighborhoods, including the City’s Business Improvement Areas (BIAs), and tailor mitigation to their operational needs and client behaviors. The City’s Office of Economic Development is available to facilitate introductions between Sound Transit and neighborhood organizations.
- For **marine-dependent businesses**, there could be permanent significant and unavoidable adverse impacts with ripple effects on other maritime related businesses.²² Some location-dependent facilities may not be able to be relocated. Sound Transit should offer comprehensive mitigation that addresses the unique challenges facing location-dependent businesses.

5. ACQUISITIONS, DISPLACEMENTS, AND RELOCATIONS: CITY ASSETS

The City highlights two City properties that will be impacted by WSLE and where project design and associated impact and mitigation conversations are ongoing: Seattle City Light South Service Center and Fire Station 14. Given the importance of these City assets; the short timeframe between the Sound Transit Board’s adoption of the project, final design, and the start of construction; and the need for City Council approval for any real property transactions; the City encourages Sound Transit to prioritize agreement with the City and implementation of mitigation to ensure the real property transactions do not delay Sound Transit’s WSLE construction timeline.

- **Seattle City Light South Service Center.** Following a site visit and ongoing discussions, the City and Sound Transit have collectively recognized that impacts from the proposed guideway column, guideway, and construction staging on Seattle City Light’s South Service Center property will impede general site circulation and ingress and egress to the site. The WSLE project will likely require

²² WSLE FEIS at 6-20.

permanent relocation of the City vehicle repair facility (Building B), fueling station, and apprenticeship training facility. Sound Transit and the City are actively addressing these complex site issues together.

- **Fire Station 14.** The WSLE FEIS Preferred Alternative DUW-1a shows a partial acquisition of Fire Station 14 and potential onsite construction;²³ Sound Transit and the City are actively addressing potential site impacts. Construction impacts could potentially include disruption to critical site utilities, which would impact Fire Station 14 and Seattle Fire Department operations. Mitigation measures should ensure that construction activities do not impede station operations or increase response times.

6. NOISE AND VIBRATION IMPACTS AND MITIGATION

In the WSLE FEIS, Sound Transit applied Federal Transit Administration (FTA) noise standards to establish impacts and the required mitigation for operational sound levels. FTA's standards are different and not comparable to the City's noise policy limits²⁴ or the Washington standards in the Washington Administrative Code. The City's noise code policy is to minimize the exposure of community members to the dangers of excessive noise and to protect, promote, and preserve the public health and safety. The City and Sound Transit have been and should continue to work together to understand if the FEIS-identified impacts and mitigation in the Duwamish and Delridge corridors will comply with City policy. Sound Transit will apply for construction noise variances when proposed construction does not comply with exterior sound limits of SMC 25.08; that permitting process will require a detailed noise impact analysis, including consideration of cumulative noise impacts.

The City appreciates Sound Transit's improvements in the noise and vibration analysis between the WSLE DEIS and WSLE FEIS. As Sound Transit moves into final design, the City remains concerned about construction and operational noise and vibration impacts near sensitive, unique, and historic buildings, including Fire Stations 14 and 36. Preferred Alternative DUW-1a—which includes elevated structures, crossovers, curves, and potential wheel squeal noise—poses heightened noise and vibration impacts and is estimated to have severe impacts on Fire Station 14.²⁵ Fire Stations 14 and 36—and all Seattle fire stations—are staffed by personnel working 24-hour shifts 24-hours/day and 7-days/week. Construction and operation noise and vibration effects to the stations must not exceed acceptable thresholds for nearby residential uses so that fire stations can fully and effectively continue to operate. The City requests that Sound Transit work with the City to determine the potential need for sound insulation or other mitigation at Fire Station 14.

The City asks to be actively involved in Sound Transit's noise and vibration analysis update during and after final design, and in the development of Sound Transit's proposed Noise Control Plan. The Plan should address both construction and operation impacts with a focus on sensitive, unique and historic buildings (including Fire Stations 14 and 36). Plan elements should include: (1) site-specific baseline analyses; (2) site-specific field noise and vibration measurements for receivers likely to experience moderate and severe impacts; (3) continuous construction monitoring; (4) protocols and contingency plans if actual noise and vibration surpass allowed limits; (5) cumulative noise impacts; and (6) robust, site-specific measures to mitigate moderate and severe impacts at the source (e.g., low impact frogs, increased thickness of concrete under track, etc.), pathway (sound walls), and receiver (e.g., double

²³ WSLE FEIS at 4.14-10, Appendix L4.1: Acquisitions, Displacements, and Relocations at L4.1-3, Figure L4.1-5b.

²⁴ SMC 25.08.

²⁵ WSLE FEIS at 4.7-13.

pane windows, sound insulation and sound absorbing materials, weatherstripping). Finally, the City encourages Sound Transit to engage community on Plan mitigation measures and to create clear communication channels with community during construction.

7. WATER RESOURCES

Sound Transit's WSLE FEIS designates guideways as non-pollution-generating.²⁶ The Washington Department of Ecology's (Ecology) 2024-2029 Stormwater NPDES permit classifies Light Rail runoff as pollution-generating. While Sound Transit has appealed this determination to the Pollution Control Hearings Board, the City is obligated to follow Ecology's guidelines and will apply the City's current 2021 Stormwater Code's treatment of guideways (railways) as pollution generating to the WSLE project.²⁷ The City will update (as allowed by law) the Seattle Stormwater Code if Ecology changes its position.

8. ECOSYSTEMS

Longfellow Creek and Pigeon Point are in Environmentally Critical Areas (ECA), and the project will need to comply with the City's governing codes and regulations for such development when Sound Transit seeks a permit for project work in these ECAs.²⁸ Longfellow Creek is an ECA fish and wildlife conservation area that includes riparian corridors, wetlands, and flood prone areas. Sound Transit's WSLE FEIS discusses Longfellow Creek,²⁹ and states direct impacts to the creek will be avoided.³⁰ Sound Transit and the City have had ongoing conversations about project impacts, potential designs, and restoration concepts not reflected in the FEIS. As proposed restoration concepts at Longfellow Creek are further explored and final design is refined, the City will continue to consider short- and long-term impacts to Longfellow Creek, exploring whether Sound Transit's mitigation could allow for future City creek restoration, and mitigation of construction-related permanent loss of forest canopy and riparian vegetation.

The light rail transit facility located at Pigeon Point is within an ECA steep slope erosion hazard area, wetlands, and wildlife habitat conservation area (Great Blue Heron Rookery and the Duwamish Greenbelt). Sound Transit's final design must comply with local code requirements³¹ and should achieve the following goals: complete stabilization of the ECA landslide-prone areas during construction and operation;³² tree retention and replacement;³³ drainage design that minimizes soil erosion; and minimized impacts to Heron and the residential properties at the top of the slope.

The City has multiple tree regulations that apply to tree impacts from the WSLE project.³⁴ The City appreciates Sound Transit's effort to create a Tree and Vegetation Management and Protection Plan for

²⁶ WSLE FEIS at 4.8-7 & n.1.

²⁷ SMC 22.801.170P.

²⁸ See, e.g., SMC 25.09.

²⁹ See, e.g., WSLE FEIS Appendix I: Mitigation Plan at I-22, I-23.

³⁰ WSLE FEIS at ES-20.

³¹ See, e.g., Environmentally Critical Areas Code SMC 25.09, Grading Code SMC 22.170, Stormwater Code 22.800-808, and Seattle Building Code.

³² SMC 25.09.012.A, SMC 25.09.080.

³³ SMC 25.09.065.B.

³⁴ 2023 One Seattle Tree Plan Executive Order; Tree and Vegetation Management in Public Spaces (SMC 15.43), Environmentally Critical Areas Ordinance (SMC 25.09), and Shoreline Overlay District (SMC 23.60A), and additional local municipal code changes since the WSLE Draft EIS was published, such as the Tree Protection Ordinance (SMC 25.11) and the Maritime and Industrial Lands Ordinance (SMC 23.50A).

WSLE. The City will collaborate with Sound Transit to ensure that plan fulfills the policy and regulatory commitments to its community members; maximizes tree preservation and planting within the project limits; mitigates tree canopy loss by planting trees in city parks, greenspaces, public lands, and rights of way; restores the ecological functions of the ECAs above; and prioritizes tree planting in neighborhoods that currently lack tree canopy.

9. GEOLOGY AND SOILS

Ground stabilization measures, pile driving, adjacent excavation, concrete pavement breaking and dewatering carry a significant risk of causing ground movement, typically settlement. Settlement can cause damage to SPU assets (e.g., underground pipes). In addition to Sound Transit's proposed "settlement monitoring program,"³⁵ the City asks that, as the project progresses into permitting, Sound Transit develop and share a Settlement Monitoring and Mitigation Plan to ensure that City assets, including underground utilities, are protected during construction and during operation.

10. UTILITIES

Since the WSLE DEIS was published, Seattle Public Utilities (SPU) has become more concerned about stray current impacts on underground infrastructure. For example, Sound Transit's recent 2023 maintenance included replacement of at-grade tracks at Royal Brougham to lessen stray current impacts at that location. Sound Transit has committed to "minimize or avoid the effect of stray currents on neighboring facilities by incorporating best management practices appropriate for the project."³⁶ The City requests Sound Transit collaboration to develop and adopt protective and specific measures for SPU's buried metallic infrastructure to ensure that stray current impacts do not reduce the service life of SPU assets.

WSLE impacts at Seattle City Light's (SCL) South Service Center (SSC) pose significant challenges and risk to SCL's operations.³⁷ The SSC is SCL's primary service center and is operational twenty-four (24) hours a day, seven days a week. The onsite vehicle repair facility is the only current service location for SCL's unique vehicles. WSLE impacts at the SSC (column location, construction staging footprint, specific vehicles accessing the repair facility) will render the repair facility temporarily or permanently inaccessible, which will significantly decrease levels of service necessary for safe and reliable electric service. The City believes that impacts at SSC severely affect the reliability and operations of SCL's essential public service: providing reliable electricity to the City of Seattle and its surrounding service territory. Sound Transit and the City need to continue to work together to address the need for full functionality of SSC operations. If further design refinements indicate that Seattle's utility services are impacted due to project activities at the SSC, Sound Transit is responsible to fully mitigate those impacts.

11. PUBLIC SERVICES, SAFETY AND SECURITY

The City is concerned about (1) WSLE construction impacts to City services and (2) ensuring Seattle Fire Department (SFD) and the Seattle Police Department (SPD) have access to Sound Transit light rail

³⁵ WSLE FEIS at 4.11-8.

³⁶ WSLE FEIS at 4.13-3.

³⁷ The City raised the SSC in its DEIS comments, but little information about impacts to the site was known at that time. See Appendix O.2.2: Response to City Comments Attachment A Comment 1417.

facilities during construction and operations to respond to emergencies. The SFD and the SPD both look forward to coordinating with Sound Transit “before and during construction to maintain reliable emergency access and alternative plans or routes to minimize delays in response times.”³⁸ Mitigation measures must ensure construction activities do not impede SFD and SPD response or increase response times.

Sound Transit has committed to working closely with SPD on a project-specific safety and security management plan that would meet all federal, state, and local requirements; developing strategies to prevent and respond to potential threats to public safety; and designing stations with Crime Prevention Through Environmental Design (CPTED) measures.³⁹ The City requests that Sound Transit commence “consultation with police and public safety services throughout the design process to minimize risk”⁴⁰ and to coordinate on access to stations, effective communication pathways, and SPD’s CPTED recommendations to improve safety.

12. PARKS AND RECREATIONAL RESOURCES AND SECTION 4(F)

The City has agreed that the taking of over three acres at Pigeon Point will result in a *de minimis* impact under Section 4(f) as long as Sound Transit and the City agree on replacement parkland that meets the City’s requirements under Seattle Ordinance 118477 (Initiative 42).⁴¹ The City and Sound Transit have not reached agreement on replacement property “of equivalent or better size, value, location and usefulness in the vicinity, serving the same community and the same park purposes;” however, the City has communicated conditions for the parkland exchanges.⁴² The City urges Sound Transit to continue working closely with the City to acquire appropriate replacement parkland and provide sufficient time for public engagement and City Council approval.

13. CUMULATIVE IMPACTS

The City acknowledges that Sound Transit’s WSLE FEIS Chapter 5 and Appendix K (Present and Future Development, Transportation, and Public Works Projects in the Study Area) identify multiple Sound Transit and other projects throughout our dense and dynamic City. There are a multitude of known and unknown activities that will occur simultaneously and across the City during affect WSLE construction—including e.g., Seattle 2026 FIFA World Cup and King County’s Mouth of Duwamish Combined Sewer Overflow (MDCSO) Program in SODO. The City encourages Sound Transit to continue to assess cumulative impacts and refine its mitigation planning to minimize impacts on the circulation and flow of all modes across the transportation system including vehicles, buses, cyclists and pedestrians, and affected businesses and City stakeholders.

14. SECTION 106 DRAFT PROGRAMMATIC AGREEMENT

The City has been actively participating as a consulting party in Section 106 consultation with Sound Transit and FTA, and previously provided comments on the Section 106 Draft Programmatic Agreement

³⁸ WSLE FEIS at 4.14-14.

³⁹ WSLE FEIS at 4.14-7 to 4.14-9.

⁴⁰ WSLE FEIS at 4.14-9.

⁴¹ See WSLE FEIS at 4.17-1, 4.17-21.

⁴² See WSLE FEIS at 4.17-1, 4.17-21, 4.18-11; WSLE FEIS Appendix H: Final Section 4(f) Evaluation, Attachment H.2, Attachment 1 (City’s Concurrence).

included in WSLE FEIS Attachment N.5G. The City looks forward to reviewing the next iteration of the Section 106 Draft Programmatic Agreement through the ongoing Section 106 consultation process.

15. CITY'S COMMITMENT TO THIRD-PARTY FINANCING

In March 2023, the City committed to share financial responsibility for the additional cost of certain *Board directed scope elements* beyond a Sound Transit alternative that is affordable in the ST3 realigned financial plan. The City and King County articulated a joint commitment of up to \$400 million in additional funding for the WSLE and BLE projects. Since then, cost estimates for WSLE have increased significantly. The WSLE FEIS suggests that the City might share responsibility for these general cost increases.⁴³ The City's third-party funding position is consistent with Draft Resolution 2024-22: "Sound Transit will advance discussions with the City of Seattle and King County to further analyze costs, funding sources and develop a funding agreement related to certain *Board directed scope elements*."

In closing, the City supports the Preferred Alternative identified in the WSLE FEIS and looks forward to working closely with Sound Transit on this transformational light rail project.

Sincerely,


Jill Macik (Oct 18, 2024 12:23 PDT)

10/18/2024

Signature

Date

Jill Macik, SEPA Responsible Official, Department of Transportation, City of Seattle


Elliot Helmbrecht (Oct 18, 2024 14:31 EDT)

10/18/2024

Signature

Date

Elliot Helmbrecht, ST3 Designated Representative, City of Seattle

cc:

Mayor Bruce Harrell

Deputy Mayor Adiam Emery

Seattle City Council Member Dan Strauss

Greg Spotts, Director, SDOT

Elizabeth Sheldon, Chief Infrastructure Officer, SDOT

Sara Maxana, Sound Transit Program Director, SDOT

CJ Holt, ST3 Program Manager, SDOT

Amy Chasanov, ST3 Mitigation and Concurrence Manager, SDOT

Saranya Gujuluva Rajan, WSLE Project Manager, SDOT

⁴³ See WSLE FEIS "Areas of Continued Controversy" at ES-31, 6-21.

Appendix C. Comments Received on the Final EIS and Responses

City of Seattle

#	Comments	Responses
1	The City provides the following comments to highlight areas requiring ongoing collaboration to reach resolution as the project moves to final design and permitting. With these comments, the City is not requesting changes to the WSLE FEIS or the ROD; however, the City will apply its codes, regulations, policies, and permitting requirements and will require project impacts to be analyzed and mitigated through final design and permitting. The City reaffirms its strong commitment to advance the project through code amendments, permitting, construction, and final delivery. The City reserves the right to supplement these comments in the future if further review of the WSLE FEIS reveals additional concerns.	Thank you for identifying areas for ongoing collaboration. Sound Transit will continue coordinating with the City through final design and permitting as the West Seattle Link Extension design advances. Sound Transit will continue to engage environmental justice communities during final design and construction to advance equitable outcomes.

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October 22, 2024

Board of Directors
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

RE: Support for West Seattle Link Extension Preferred Alternative (DUW 1a)

Dear Board of Directors,

On behalf the Port of Seattle (Port) and The Northwest Seaport Alliance (NWSA), thank you for the opportunity to provide comment on the Sound Transit West Seattle Link Extension (WSLE) proposed project approval. We appreciate Sound Transit's direct engagement with Port staff as a cooperating agency and with NWSA as a participating agency and, especially, the opportunities to work with Sound Transit staff on maritime issues in development of the alternatives.

In 1911, the Port was authorized by the citizens of King County under Chapter 53 of the Revised Code of Washington to serve as a public port authority, charged with ensuring that Seattle's deep-water harbor is protected to serve as an economic engine for the region.

The unique partnership began in 2015, with the formation of the NWSA as a marine cargo operating partnership of the Port of Seattle and Port of Tacoma. NWSA is one of the largest container gateways in the United States, managing the container, breakbulk, auto and some bulk terminals in Seattle and Tacoma and serving as the international gateway for goods imported to and exported from Washington State.

Support for preferred alternative: Our maritime cargo terminals and the related properties we manage will be impacted no matter what alternative is selected, but we support the preferred alternative as it provides the lowest level of direct impact to our maritime cargo operations.

"Maintenance of Traffic" planning with port forecasts: During the years of construction and as recognized in the FEIS, Sound Transit will need to develop significant maintenance of traffic (MOT) plans that will include long-term road closures. COVID, recent labor strikes, and geopolitical issues have demonstrated that maritime freight volumes are volatile. We must continue planning for the cyclical nature of said freight volumes, recognizing the strengths of the Pacific Northwest as an international gateway.

Contractor coordination with POS/NWSA in contract specifications: As Sound Transit moves forward with this significant investment, we ask that the design/build project's specifications include that the contractor must coordinate MOT plans with the Port/NWSA. We look forward to providing freight information to support a resilient transportation system during construction.

An economically cohesive Duwamish MIC through business relocations: This vibrant light rail network will traverse urban centers and residential neighborhoods as well as the Duwamish Manufacturing and Industrial Center (MIC). The line benefits from stations with employment opportunities, such as in SODO and throughout the MIC, to complement the other planned and existing stations that are more suitable for housing. As the WSLE advances to construction, we recognize some businesses will be displaced. In the SODO area, we implore Sound Transit to minimize these displacements and support displaced businesses relocating within Seattle's industrial areas to the greatest extent possible. Our economic contribution is enhanced by the collocation of maritime and industrial businesses.

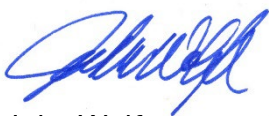
Transit-oriented workforce development: In addition, we will look to Sound Transit to support the maritime and supply chain ecosystem's future in the MIC as it seeks to sell acquired property following construction of the WSLE. We recognize that Sound Transit has a robust transit-oriented development (TOD) program that seeks to create thriving station environments and can be a partner in that effort for SODO. We are uniquely suited to support Sound Transit in creating a station environment that benefits from the maritime and local economic and employment base of SODO.

In summary and in the spirit of continuing our collaborative working relationship, as the project advances past the FEIS stage we request that Sound Transit:

1. Include a contract specification requiring coordination with the Port/NWSA on construction impacts including impacts to waterways and maintenance of traffic on truck streets.
2. Minimize interruption to waterway passage and rail traffic critical to maritime freight and the operation of other water-dependent businesses.
3. Continue to work with us on protecting freight fluidity. Major Truck streets are being impacted by the WSLE, and the transportation system needs to work for all modes.
4. Coordinate with the Port and NWSA in the relocation of on-street drayage truck parking. We can help keep truckers informed.
5. Engage the Port and NWSA early in the surplus property and TOD planning process. As property is redeveloped following construction, it is vital that new uses are compatible with port operations. Housing is not compatible.

Thank you again for this opportunity to provide comment. We look forward to our continuing our partnership and ongoing collaboration.

Sincerely,



John Wolfe
Chief Executive Officer
The Northwest Seaport Alliance



Karen Goon
Deputy Executive Director
Port of Seattle

Appendix C. Comments Received on the Final EIS and Responses

NWSA and the Port

#	Comments	Responses
1	<p>Support for preferred alternative: Our maritime cargo terminals and the related properties we manage will be impacted no matter what alternative is selected, but we support the preferred alternative as it provides the lowest level of direct impact to our maritime cargo operations.</p> <p>“Maintenance of Traffic” planning with port forecasts: During the years of construction and as recognized in the FEIS, Sound Transit will need to develop significant maintenance of traffic (MOT) plans that will include long-term road closures. COVID, recent labor strikes, and geopolitical issues have demonstrated that maritime freight volumes are volatile. We must continue planning for the cyclical nature of said freight volumes, recognizing the strengths of the Pacific Northwest as an international gateway.</p> <p>Contractor coordination with POS/NWSA in contract specifications: As Sound Transit moves forward with this significant investment, we ask that the design/build project’s specifications include that the contractor must coordinate MOT plans with the Port/NWSA. We look forward to providing freight information to support a resilient transportation system during construction.</p> <p>An economically cohesive Duwamish MIC through business relocations: This vibrant light rail network will traverse urban centers and residential neighborhoods as well as the Duwamish Manufacturing and Industrial Center (MIC). The line benefits from stations with employment opportunities, such as in SODO and throughout the MIC, to complement the other planned and existing stations that are more suitable for housing. As the WSLE advances to construction, we recognize some businesses will be displaced. In the SODO area, we explore Sound Transit to minimize these displacements and support displaced businesses relocating within Seattle’s industrial areas to the greatest extent possible. Our economic contribution is enhanced by the collocation of maritime and industrial businesses.</p> <p>Transit-oriented workforce development: In addition, we will look to Sound Transit to support the maritime and supply chain ecosystem’s future in the MIC as it seeks to sell acquired property following construction of the WSLE. We recognize that Sound Transit has a robust transit-oriented development (TOD) program that seeks to create thriving station environments and can be a partner in that effort for SODO. We are uniquely suited to support Sound Transit in creating a station environment that benefits from the maritime and local economic and employment base of SODO.</p> <p>In summary and in the spirit of continuing our collaborative working relationship, as the project advances past the FEIS stage we request that Sound Transit:</p> <ol style="list-style-type: none"> 1. Include a contract specification requiring coordination with the Port/NWSA on construction impacts including impacts to waterways and maintenance of traffic on truck streets. 2. Minimize interruption to waterway passage and rail traffic critical to maritime freight and the operation of other water-dependent businesses. 3. Continue to work with us on protecting freight fluidity. Major Truck streets are being impacted by the WSLE, and the transportation system needs to work for all modes. 4. Coordinate with the Port and NWSA in the relocation of on-street drayage truck parking. We can help keep truckers informed. 5. Engage the Port and NWSA early in the surplus property and TOD planning process. As property is redeveloped following construction, it is vital that new uses are compatible with port operations. Housing is not compatible. 	<p>Thank you for your comment. Sound Transit will continue coordinating with NWSA and the Port as the West Seattle Link Extension design advances.</p>

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Appendix C- Business and Business Organization Comments

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Subject	Board Meeting Comments 9-26-24 Meeting from Pacific Iron & Metal Co.
From	Ryan Glant
To	Meeting Comments
Sent	Wednesday, September 25, 2024 3:40 PM
Attachments	<<Pac Iron Board Meeting Comments WSBLE FEIS 09252024.pdf>>

You don't often get email from rglant@paciron.com. [Learn why this is important](#)

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To whom it may concern – Please find attached our Board Meeting Written Comments for tomorrow’s meeting.

Thank you,
Ryan

Ryan Glant
CEO/President
Glant Pacific Companies
(Pacific Iron & Metal, Pacific Fabrics and Seattle's Doorhouse)
www.paciron.com
www.pacificfabrics.com
www.seattlesdoorhouse.com
Pacific Iron & Metal
2230 4th Ave South
Seattle, WA 98134
☎ 206-628-6242



Recycled Materials
Association
Sustainable. Resilient. Essential.



September 25, 2024

Sound Transit Board Meeting Comments 9-26-24
meetingcomments@soundtransit.org

Submitted via email

Re: West Seattle and Ballard Link Extensions Final EIS Board Comment

Pacific Iron & Metal Co., also known as Pac Iron, is a family-operated, 107-year-old industrial metal recycled materials facility located at 2230 4th Ave S in Seattle. We are one of the largest metal recyclers in the region, and the only one primarily focused on non-ferrous metals serving Seattle, Bellevue and the surrounding communities. Thanks to our global network of consumers curated from 100-plus years of relationship-making in the industry, we are uniquely positioned to serve our public, private and governmental partners with their critical metal recycling needs.

We have operated at our location in SODO for more than 80 years, serving many of the public agencies and large companies that are integral to the region's economy. Pac Iron handles millions of pounds of non-ferrous metal each month for clients in both the private and public sector, including, but not limited to, Puget Sound Energy, City of Tacoma, Seattle City Light, Snohomish County PUD, the City of Mercer Island, the US Coast Guard, Sound Transit, and countless others. We also serve hundreds of the region's machine shops and other manufacturers that supply critical aerospace and marine parts both for defense contracts and commercial business. All of these partners expect and must have our service available without interruption. In an extremely mature industry, our location at the nexus of I-5 and I-90 and our proximity to the Port of Seattle are critical to our ability to efficiently serve the needs of our customers.

Our location is also home to two sister businesses, Seattle's Doorhouse and Pacific Fabrics. Pacific Fabrics is a beloved retail store for the sewing community, and Seattle's Doorhouse is the go-to location for homeowners and contractors looking for reasonably-priced and reliable doors with a quick delivery. Across our three businesses, we employ more than 70 people in family-wage jobs.

At this Board's meeting, dated November 17, 2022, members of the Board and the Chair of the System Expansion Committee spoke on the record of refinements the System Expansion Committee requested of the project team to eliminate the dramatic effect some of the SODO station designs had on our businesses, as further outlined in the System Expansion Committee's meeting minutes from November 10, 2022 as follows: "Such refinements would mitigate impacts to Pac-Iron and local industry..." Those refinements appear to have been memorialized within Option 1-c for the SODO Station design as outlined in the FEIS recently released. We note that one of the parcels on which Pacific Iron & Metal operates has been listed in Appendix L as being potentially affected in all station designs, including Option 1-c, which was meant to mitigate impacts to our business. After discussion with members of the Sound Transit design team since the release of the FEIS, it is our understanding that the impacts of the station design as currently designed would be extremely minimal to non-existent.

Pacific Iron & Metal and its sister businesses wishes to thank the Board and Sound Transit staff for its efforts to mitigate the adverse effects of the project on the three affected businesses and its employees and customers. With our comments today, we would respectfully ask that their continue to be dialogue with the leadership team at Pacific Iron as the station design is further fine-tuned to ensure the mitigation remains intact as the project progresses along.

Sincerely,

Ryan Glant



CEO/President

Pacific Iron & Metal
2230 4th Ave S
Seattle, WA 98134
rglant@paciron.com
(206) 628-6242

Appendix C. Comments Received on the Final EIS and Responses

Communication ID: 554778 – Pacific Iron and Metal

#	Comments	Responses
1	<p>After discussion with members of the Sound Transit design team since the release of the FEIS, it is our understanding that the impacts of the station design as currently designed would be extremely minimal to non-existent. Pacific Iron & Metal and its sister businesses wishes to thank the Board and Sound Transit staff for its efforts to mitigate the adverse effects of the project on the three affected businesses and its employees and customers. With our comments today, we would respectfully ask that their continue to be dialogue with the leadership team at Pacific Iron as the station design is further fine-tuned to ensure the mitigation remains intact as the project progresses along.</p>	<p>Thank you for your comment. Sound Transit will continue to coordinate with affected property owners and adjacent property owners as the West Seattle Link Extension advances.</p>

Subject	Light trail impacts on the WS BIA
From	Chris Mackay
To	Email The Board
Sent	Monday, September 30, 2024 3:27 PM
Attachments	<<Impacts on WSJA BIA during Light Rail construction.pdf>>

You don't often get email from chris@wsjunction.org. [Learn why this is important](#)

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Hello Sound Transit Board,

I wanted to alert you to the impact that light rail construction will have on our West Seattle BIA budget and therefore our ability to offer services.

The attached letter (sent today to Mayor Bruce Harrell and Lauren Swift at Sound Transit) outlines that impact.

Let me know if you have any questions.

Let me know if you have any questions,

Warmly,

Chris Mackay
Executive Director
West Seattle Junction Association
206-502-8824





September 30, 2024

Lauren Swift
Sound Transit
401 S. Jackson St
Seattle, WA 98116

Bruce Harrell
Mayor of the City of Seattle
600 Fourth Ave, 7th Floor
Seattle, WA 98104

Subject: Urgent Request for Mitigation Support for the West Seattle Business Improvement Area During Light Rail Construction

Dear Mayor Harrell and Ms. Swift,

I hope this message finds you well. I am writing on behalf of the West Seattle Business Improvement Area (BIA) to express our concern regarding the anticipated financial impact of the West Seattle Light Rail station construction on our local businesses. While we wholeheartedly support the Light Rail expansion and the future benefits it will bring, the construction phase poses a significant challenge to the financial sustainability of our BIA.

Background on the West Seattle Junction Association (WSJA):

The West Seattle Junction Association, established in 1987, serves as a Business Improvement Area comprised of local merchants and businesses. With a dedicated Board of Directors and committees, we organize key activities that enhance the community, including marketing, beautification, events, safety initiatives, and cleaning services. Over the years, the WSJA has been a cornerstone of economic vitality, hosting community events, supporting local businesses, and maintaining the vibrancy of our neighborhood.

The key benefits we provide to the Junction business district include:

- Fostering a strong and vibrant community atmosphere for businesses and residents alike.
- Driving increased retail sales and patronage within the Junction.
- Enhancing the business image and consumer awareness of the area.
- Overseeing neighborhood beautification projects and special events.
- Managing a robust "Clean and Safe" program that includes a dedicated cleaning crew and private security.
- Offering low-cost parking options for patrons of the Junction.
- Promoting local businesses through targeted marketing efforts.
- Providing a platform for community engagement and advocacy.

The Impact of Light Rail Construction

The West Seattle Junction BIA currently represents 253 businesses, with an 8% expansion pending approval. For 2024, our projected revenue is approximately \$450,000, carefully allocated to cover essential services, including

parking management, safety, events, marketing, beautification, and staffing. Unfortunately, 38 businesses within the Junction will be demolished to accommodate the new station (Station 3), resulting in a projected loss of \$48,209 annually throughout the construction period.

Our BIA operates on a self-declared revenue model, and the anticipated revenue loss—over 10% of our annual budget—will severely impact the services we provide to the community. As construction is expected to continue well into the 2030s, this prolonged reduction in resources threatens our ability to maintain the high standard of services and support our local merchants rely on.

Request for Mitigation Support

While we fully acknowledge the importance of transit infrastructure, we respectfully request the establishment of a mitigation fund to support the West Seattle Junction Association during the construction phase. This financial assistance would enable us to continue delivering critical services that maintain the vitality of the Junction business district and ensure its resilience through this challenging period.

We appreciate your attention to this pressing matter and are eager to discuss potential solutions that can help us sustain the Junction community during the Light Rail construction.

Thank you for your time and consideration.

Warm regards,
Chris Mackay
Executive Director
West Seattle Business Improvement Area

Appendix C. Comments Received on the Final EIS and Responses

Communication ID: 555051 – West Seattle Junction Association

#	Comments	Responses
1	<p>The Impact of Light Rail Construction</p> <p>The West Seattle Junction BIA currently represents 253 businesses, with an 8% expansion pending approval. For 2024, our projected revenue is approximately \$450,000, carefully allocated to cover essential services, including parking management, safety, events, marketing, beautification, and staffing. Unfortunately, 38 businesses within the Junction will be demolished to accommodate the new station (Station 3), resulting in a projected loss of \$48,209 annually throughout the construction period.</p> <p>Our BIA operates on a self-declared revenue model, and the anticipated revenue loss—over 10% of our annual budget—will severely impact the services we provide to the community. As construction is expected to continue well into the 2030s, this prolonged reduction in resources threatens our ability to maintain the high standard of services and support our local merchants rely on.</p> <p>Request for Mitigation Support</p> <p>While we fully acknowledge the importance of transit infrastructure, we respectfully request the establishment of a mitigation fund to support the West Seattle Junction Association during the construction phase. This financial assistance would enable us to continue delivering critical services that maintain the vitality of the Junction business district and ensure its resilience through this challenging period.</p> <p>We appreciate your attention to this pressing matter and are eager to discuss potential solutions that can help us sustain the Junction community during the Light Rail construction.</p>	<p>Sound Transit appreciates your engagement during the West Seattle Link Extension planning and environmental process. Our business relations team will be in contact later during the design phase to discuss construction mitigation approaches.</p>

Subject	Resolution No. R2024-22, Selecting the West Seattle project to be built
From	Rachel Smith
To	Meeting Comments
Sent	Thursday, October 10, 2024 1:10 PM
Attachments	< <2024_1010_SMCC_West_Seattle_Project.pdf> >

Dear Chair Balducci and Committee Members,

On behalf of the Seattle Metropolitan Chamber of Commerce and our 2,500 members, please find attached a letter urging the committee to forward a recommendation to the Board of Directors to approve Resolution No. R2024-22, selecting the project to be built for the West Seattle Link Extension Project.

Thank you,

Rachel Smith

President and CEO

[Seattle Metropolitan Chamber of Commerce](#)

rachels@seattlechamber.com | **d:** (206) 389-7222 | **c:** (918) 809-2449

Visit our [website](#) for events, business news, advocacy information and jobs, plus - text SEATTLE to 52886 - and never miss an important update from the Chamber.



October 10, 2024

Claudia Balducci, Chair
System Expansion Committee
Sound Transit Board of Directors
401 S. Jackson Street
Seattle, WA 98104

Dear Chair Balducci and Committee Members,

On behalf of the Seattle Metropolitan Chamber of Commerce and our 2,500 members, I am writing to urge the committee to forward a recommendation to the Board of Directors to approve Resolution No. R2024-22, selecting the project to be built for the West Seattle Link Extension Project.

The Chamber and its members are enthusiastic supporters of the expansion of light rail throughout the Puget Sound region. Connecting light rail to West Seattle and communities in between will support a thriving, equitable, and inclusive regional economy that is predicated on people being able to safely and reliably get to work and school and back home to their families and enjoy the natural beauty and recreational and cultural opportunities that surround us.

Recently, the Board of Directors was briefed on increased cost estimates for the West Seattle link extension, a situation which other infrastructure projects in the Puget Sound region and across the country are also facing. Unprecedented rates of inflation, national supply chain disruptions, and large capital delivery programs across the country are creating challenges for public agencies charged with delivering infrastructure investments.

Selecting the West Seattle link extension project to be built creates the best opportunity for the agency to proactively address these challenges through engineering, construction methodology and delivery approach, and financial strategies. We appreciate the Board directing agency staff in Motion No. M2024-59 to prepare a work plan on the programmatic, financial, and project-level measures and opportunities the agency will pursue to inform a financially sound project. This work plan will provide transparency and accountability for the Board and public and help to ensure the project and the entire ST3 program are delivered as committed to the public.

We look forward to continuing to work with you, agency staff, and the City of Seattle to ensure this project results in a high-quality transit service that serves the people of Seattle and Sound Transit district for the next 100 years.

Sincerely,

Rachel Smith
President & CEO

Appendix C. Comments Received on the Final EIS and Responses

Communication ID: 555320 – Seattle Metropolitan Chamber of Commerce

#	Comments	Responses
1	<p>I am writing to urge the committee to forward a recommendation to the Board of Directors to approve Resolution No. R2024-22, selecting the project to be built for the West Seattle Link Extension Project.</p> <p>The Chamber and its members are enthusiastic supporters of the expansion of light rail throughout the Puget Sound region. Connecting light rail to West Seattle and communities in between will support a thriving, equitable, and inclusive regional economy that is predicated on people being able to safely and reliably get to work and school and back home to their families and enjoy the natural beauty and recreational and cultural opportunities that surround us.</p> <p>Recently, the Board of Directors was briefed on increased cost estimates for the West Seattle link extension, a situation which other infrastructure projects in the Puget Sound region and across the country are also facing. Unprecedented rates of inflation, national supply chain disruptions, and large capital delivery programs across the country are creating challenges for public agencies charged with delivering infrastructure investments.</p> <p>Selecting the West Seattle link extension project to be built creates the best opportunity for the agency to proactively address these challenges through engineering, construction methodology and delivery approach, and financial strategies. We appreciate the Board directing agency staff in Motion No. M2024-59 to prepare a work plan on the programmatic, financial, and project-level measures and opportunities the agency will pursue to inform a financially sound project. This work plan will provide transparency and accountability for the Board and public and help to ensure the project and the entire ST3 program are delivered as committed to the public.</p> <p>We look forward to continuing to work with you, agency staff, and the City of Seattle to ensure this project results in a high-quality transit service that serves the people of Seattle and Sound Transit district for the next 100 years.</p>	<p>Your support for the West Seattle Link Extension has been noted. Sound Transit looks forward to continuing coordination through the design and construction phases.</p>

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Subject	Fwd: WSLE - please consider NO BUILD option
From	Daniel O'Malley
To	Email The Board
Sent	Sunday, October 20, 2024 12:14 PM
Attachments	<<SoundTransit_LightRail_20241020_BladeGallery.pdf>>

You don't often get email from omalley@bladegallery.com. [Learn why this is important](#)

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Dear Mike Riker,

The ST3 transportation vote asked voters to consider improved public transit, encouraging economic development and protecting the environment. While these are enviable goals, the environmental review process has instead revealed significant negative social, economic, and environmental impacts of the West Seattle Light Rail project.

Rather than improving transit in West Seattle, independent transit experts have suggested the WSLE transit times and ridership will degrade, not improve after this project is completed. In fact, experts have suggested that Light Rail will produce increased transfer requirements and wait times compared to the current ridership experience.

The amount of carbon generation from this project will be more than the carbon reducing impacts of the WSLE trains over five decades of operation. This certainly makes the lofty environmental claims of the project limited.

Cost estimates jumped \$1.6 billion (as reported in The Urbanist) from 4 billion. This is a 30-40% increase for the West Seattle Link. In fact, Sound Transit has subsequently revealed that the increase may be \$2.7-3.1 billion more than the Draft EIS estimate. While cost overruns on large projects are not unique, this large of a cost estimate jump is extremely unusual. Additionally, given the long timelines already incorporated into the project, it is likely that the actual cost will be significantly higher.

The West Seattle Link has come under sharp criticism for planned displacements of businesses both in SODO (such as our business) and in West Seattle. The SODO segment is decimating the historic warehouse district (of which our building is a part). While some costs to those businesses will be covered, numerous meetings with Sound Transit have made it clear that businesses such as ours will not be fully “made-whole” and we should expect to have substantial losses caused by this forced move. Given that this is shortly after the economic hardships caused by COVID19, subsequent inflation, and interest rate hikes, it is likely that many businesses such as ours may be ultimately be forced out of operation – leading to a community loss and ultimately a tax revenue loss. With over 500 letters and emails sent by our customers, vendors, and community members during the EIS comment period, it is clear that many people are feeling our potential loss.

Given the significant negative impacts of this development, the ballooning costs, questionable transit benefits, and negative environmental impact, I urge the board to consider the No Build option for the West Seattle Light Rail.

Thank you for your consideration in this project and for my small business.

Sincerely,

Daniel O'Malley

President, BladeGallery Inc

SODO, Seattle

www.bladegallery.com | www.epicedge.com | www.bladeconnection.com | www.shaveenvy.com



BLADEGALLERY.COM



October 20, 2024

The ST3 transportation vote asked voters to consider improved public transit, encouraging economic development and protecting the environment. While these are enviable goals, the environmental review process has instead revealed significant negative social, economic, and environmental impacts of the West Seattle Light Rail project.

Rather than improving transit in West Seattle, independent transit experts have suggested the WSLE transit times and ridership will degrade, not improve after this project is completed. In fact, experts have suggested that Light Rail will produce increased transfer requirements and wait times compared to the current ridership experience.

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Given the significant negative impacts of this development, the ballooning costs, questionable transit benefits, and negative environmental impact, I urge the board to consider the No Build option for the West Seattle Light Rail.

Thank you for your consideration in this project and for my small business.

Sincerely,

Daniel O'Malley
President

Appendix C. Comments Received on the Final EIS and Responses

Communication ID: 555599 – Blade Gallery

#	Comments	Responses
1	Given the significant negative impacts of this development, the ballooning costs, questionable transit benefits, and negative environmental impact, I urge the board to consider the No Build option for the West Seattle Light Rail.	Your support for the No Build Alternative has been noted.



October 18, 2024

VIA EMAIL

Goran Sparrman
Interim Chief Executive Officer, Sound Transit
401 S Jackson St.
Seattle, WA 98104

RE: SODO BIA Concerns Regarding WSLE FEIS and Impacts to SODO Industrial District

Dear Mr. Sparrman:

We write this letter to articulate the SODO Business Improvement Area's (BIA) concerns about the West Seattle Link Extension Final Environmental Impact Statement (EIS) and the plan's catastrophic impacts to Seattle's thriving industrial sector. **On behalf of the over 1200 business and 50,000 employees of SODO, and in the strongest of terms, we urge Sound Transit to conduct a supplemental Final EIS for the SODO and Duwamish segments of the West Seattle Link Extension instead of advancing the project to the design phase.**

Further study is essential because the current Final EIS **1) undermines public accountability** by adding new project elements without public engagement; **2) fails to adequately discuss mitigation plans**, thereby underestimating impacts and costs; and **3) contradicts itself and other key planning documents**, demonstrating a fundamental misunderstanding of SODO, its operations, and its regional importance. These issues permeate the material concerns we share with you later on in this document, and the Final EIS is an insufficient document with many ambiguities. Ultimately, this is a matter of public accountability.

Since 2017, the SODO BIA has actively worked to educate Sound Transit on how SODO's unique, industrial ecosystem operates and to ensure the district's needs are met during the planning, construction, and operation of the light rail expansion. We have been clear with staff that the stakes of building light rail through Seattle's industrial heart are high but not insurmountable, and we recognized and acted upon the critical need to familiarize decisionmakers with what is at risk if the light rail expansion is insensitive to SODO's operations. More specifically, the BIA participated in the EIS scoping, regularly hosted public engagement events for Sound Transit, provided tours for Sound Transit board members and staff, and submitted technical questions and comments on the Draft EIS. The Final EIS clearly demonstrates that the BIA's efforts have been in vain.

SODO has been treated as an afterthought throughout the ST3 planning process, a neighborhood to be damaged for the greater good, and not a focus of concern. We have hoped and worked and pushed to create a collaborative relationship with Sound Transit staff and the City of Seattle to design a high-performing, state-of-the-art multimodal transportation network, but our efforts have ultimately been unsuccessful. While Sound Transit staff have failed SODO, we now look to the Sound Transit Board of Directors to provide the much-needed leadership. Our specific concerns are listed later on in this letter and in the technical appendix attached. Our concerns largely pertain to the following items:

- **4th Avenue S Redesign & Closure of the SODO Busway**
- **Potential Redirect and Temporary Station for Existing Light Rail**
- **Relocation of 230-kV Power Lines & 6th Avenue S Impacts**
- **S Lander Street Overpass Design & Impacts**
- **Sequencing, Connectivity, & Mobility**
- **Pre-Construction & FIFA World Cup**
- **SODO Trail Mitigation**

Background

The SODO Business Improvement Area (BIA) is a robust and diverse 950-acre (41,382,000 SF) business district centered around a strong industrial base critical to Seattle’s people and its economy. More than 1,200 businesses and 50,000 jobs are located in SODO. With regard to the West Seattle Link Extension, the SODO BIA’s boundaries include the SODO segment and the eastern half of the Duwamish segment, but the project segments do not delineate any material differences for the district itself; the impacts from one project segment can and will impact the other segment.

Earlier in 2024, the SODO BIA worked with the University of Washington’s Evans School of Public Policy and Governance and its Student Consulting Lab to better understand the economic impact of SODO on the greater Puget Sound Region. After a thorough literature review and business engagement, the research team concluded that SODO is an optimal neighborhood for industrial businesses that rely on the efficient movement of goods and materials due to its geographic location. With the Port of Seattle in the west, I-90 and downtown to the north, I-5 to the east, Boeing Field to the south, and rail throughout, SODO’s location is unparalleled for industry – ideal for early development, manufacturing, and logistics. The unique industrial environment allows for operations that are loud, smelly, and could not otherwise be conducted in a more densely populated or less industrial area. Please see the attached Economic Appendix for a selection of quotes from the Final EIS and the Evans School report that highlight SODO’s local and regional economic importance.

SODO has one of the highest single-occupancy vehicle commuter rates in Seattle, in part, because the district’s public transit lacks last-mile connections, and regional services are mis-timed to serve this area. Most jobs in SODO start early and do not follow the typical nine-to-five hours of operation, and our transit system serves to shuttle people through SODO to downtown instead of serving the people that work here. Commuters and visitors destined for downtown Seattle rely on the Link Light Rail, 4th Avenue S, the SODO Busway, and the SODO Trail. All of these are set to be heavily disrupted or permanently altered due to the West Seattle Link Extension. The Final EIS minimally discusses these disruptions or their impacts, and the main mitigation strategy can best be summarized as a “just trust us” approach.

Trust-building has largely been absent from Sound Transit’s planning process for the SODO district. Instead, Sound Transit staff chose not to grant SODO ‘Community Advisory Group’ status, and the BIA was forced to attend two different advisory groups focused on other parts of the city. This issue was intensified by the separation into the West Seattle Link Extension and the Ballard Link Extension at S Holgate Street, officially cutting SODO in half and making it truly impossible to determine what the actual impacts on SODO will be until both projects are completed.

According to [Sound Transit’s website](#), the Final EIS is supposed to “[Inform] the public, Tribes, agencies and decision makers about the preferred alternative and other alternatives, including

potential environmental consequences, ways to avoid, minimize and mitigate potential impacts.” Unfortunately, the process Sound Transit staff chose to take has produced a document that fails to meet those standards. Below, you will find a brief summary of major issues, and we have attached a technical appendix with more specific information on each item.

Specific Comments and Requests

4th Avenue S Changes & Busway Mitigation

Between 1,440 and 1,920 buses will use 4th Avenue S every day due to the permanent closure of the SODO Busway, likely triggering a full rework of 4th Avenue S between S Spokane Street and S Holgate Street. The Final EIS does not identify a mitigation strategy and provides inadequate detail on the associated impacts and project sequencing. Analyses conducted are misaligned with SODO operations.

Potential Temporary Station

In the Final EIS, Sound Transit introduced a potential temporary station for the 1 Line during construction. This is a completely new project element with extensive impacts to transit users, businesses, and property owners that has had no public input.

230-kV Power Line Relocation & 6th Avenue S

Sound Transit needs to relocate high-voltage power lines from the SODO Busway to build the new light rail line, but the Final EIS fails to identify property and right-of-way impacts. Other, non-Final EIS documents suggest property demolition will be a part of this work. According to the Final EIS, 6th Avenue S is expected to experience full closure for indeterminate periods of time, and due to Seattle’s Compete Streets Ordinance, the power line relocation may also require a full rework of 6th Avenue S. Furthermore, Sound Transit incorrectly asserts, **“Effects to future land uses are anticipated to be minimal because this area is within the Duwamish Manufacturing/Industrial Center and redevelopment into denser land uses is not anticipated in the City of Seattle Comprehensive Plan” (Page 4.2-12)**. However, in 2023, the City of Seattle completed the Industrial & Maritime Strategy which created a new zoning category of Industry and Innovation zone in this area that would support denser development.

Sequencing, Connectivity & Mobility

The West Seattle Link Extension will require extensive changes and closures to 4th Avenue S, 6th Avenue S, the SODO Busway, and S Lander Street. While potential timing is highlighted for some individual elements of construction on these roadways, there is little consideration to sequencing these changes to reduce the impacts to businesses and maintain functionality in the district. All modes of transportation are expected to feel the impact of these closures, especially freight and transit as key connectors lose functionality throughout the life of the project and beyond. Little-to-no thought is given to the pedestrian experience during construction.

Pre-Construction & FIFA World Cup

Based off of previous conversations with Sound Transit staff, mitigation projects, such as the 4th Avenue S rework or the 230-kV power line relocation, may start before official construction begins in 2027. The lack of detail regarding project scope, sequencing, timing, and impact for any pre-2027 work is worrisome given the crowds anticipated for the FIFA World Cup in 2026, and the FIFA World Club Cup in 2025. It is extremely concerning that we may be functioning at reduced capacity and on temporary routes with nearly a million people coming to SODO.

S Lander Street Overpass

The Final EIS contains minimal discussion and drawings of the proposed overpass at S Lander Street between 6th Avenue S & 4th Avenue S. It is highly unlikely that the overpass can be built without significant changes to these intersections, including raising them several feet and adding hills to a flat area, which will hinder freight and pedestrian mobility.

SODO Trail Mitigation

The Final EIS identifies the SODO Trail will be moved to 6th Avenue S, but there are no specific plans to explain what this will look like during the construction period or how it will integrate with other mitigation efforts.

These concerns are explained in more detail in the following technical memo, and it should be noted that the issues identified here do not constitute the totality of impacts to the SODO district from light rail expansion. As we write this letter, we are preparing to enter the scoping process for Ballard Link Extension Draft EIS and will be evaluating a second set of significant impacts to this district that to date are still not completely known.

Recommendations

We understand Sound Transit is making improvements to their organization and culture, but the West Seattle Link Extension is not receiving those benefits. Advancing the West Seattle Link Extension forward would be highly irresponsible at this time. With the extensive issues in the Final EIS, an opaque planning process, and large cost increases, Sound Transit staff have put the Board of Directors in an uncomfortable and difficult position. Conducting a supplemental EIS is an opportunity for Sound Transit staff to address significant issues while re-instilling trust and accountability.

Beyond a supplemental EIS, the BIA submitted a series of recommendations in our comments on the Draft EIS. These recommendations were not taken up by Sound Transit, but we are including them below:

*One of the best ways Sound Transit and the City of Seattle can help the SODO BIA is by entering into a **Memorandum of Agreement** that will protect in place SODO's businesses, workers, residents, and commuters, and provide a high-performing multi-modal transportation network. **This should include a SODO/Duwamish Community Advisory Group; Neighborhood Traffic Mitigation Committee, Construction Hub Coordinator, Land Use planning, regular in-person/on-site information and meetings with SODO BIA leadership, and a Mitigation Fund.***

Thank you for your attention to this very important matter. We look forward to working with you collectively to protect, preserve, and enhance SODO's unique and critical business community.

Best regards,
SODO Business Improvement Area



Erin Goodman
Executive Director

Cc: Bruce Harrell, Mayor, City of Seattle
Dan Strauss, Councilmember, City of Seattle
Dow Constantine, King County Executive
Dave Somers, Snohomish County Executive
Claudia Balducci, Councilmember, King County
Girmay Zahilay, Councilmember, King County
Peter von Reichbauer, Councilmember, King County
Dave Upthegrove, Council Chair, King County
Roger Millar, Washington Secretary of Transportation
Nancy Backus, Mayor, City of Auburn
Angela Birney, Mayor, City of Redmond
Bruce Dammeier, Pierce County Executive
Cassie Franklin, Mayor, City of Everett
Christine Frizzell, Mayor, City of Lynnwood
Ed Prince, Councilmember, City of Renton
Kim Roscoe, Mayor, City of Fife
Kristina Walker, Councilmember, City of Tacoma
Mark Riker, Labor Liaison

This appendix is meant to convey the economic importance of SODO. SODO is the heart of the Duwamish Manufacturing/Industrial Center (DMIC) due to its close proximity to state and national highway systems, the Port of Seattle and Duwamish River, the national rail network, Downtown Seattle, and Boeing Field. Below, you will find excerpts from Sound Transit's Final EIS for the West Seattle Link Extension and the Evans School Consultant's report referenced in our letter.

West Seattle Link Extension Final EIS; Sound Transit et al., 2024

"As one of the largest industrial centers in the Pacific Northwest, [the DMIC] has an estimated employment of close to 70,000 jobs across key sectors such as manufacturing, construction, resource extraction, and wholesale/transportation/utilities (City of Seattle et al. 2020)" (Page 4.3-4).

"Overall, the [DMIC] supports 104,800 jobs and \$24.3 billion in business revenue throughout the King County economy directly and through indirect (the business supply chain) and induced (household income expenditures) effects. For every job supported by businesses in the center, 1.6 full-time equivalent jobs are supported throughout the King County economy. The regional economic impact of these businesses is measured at 5.9 full-time equivalent jobs per million dollars in business revenues and \$1.40 of output for every dollar of business revenues (City of Seattle et al. 2020)" (Page 4.3-4).

SODO Economic and Policy Analysis Report; Harvey, C., Varela, J., Alzawad, M., and Kang, S., 2024

"As highlighted in the 'Urban Manufacturing in Seattle' report, industrial lands account for just 4% of Seattle's land area but provide around 100,000 jobs and \$21 billion in annual economic activity" (Page 13-14).

"Major companies like Starbucks and Costco are either headquartered in or closely associated with SODO. Over 1,200 individual businesses make up the SODO neighborhood, with 70+ restaurants, 70+ manufacturers and producers, and 85+ stores/outlets available. Despite SODO's assets, the neighborhood's economic contributions are often misunderstood and understated" (Page 48).

"Stakeholder interviews emphasized that over 550 businesses in SODO pay roughly 30% of Seattle's total business operating tax" (Page 48).

"A sense of pride exists in SODO. The neighborhood, situated right beside the natural deep-water Port of Seattle, moves goods from the American Midwest to nations across the globe. SODO includes neighborhood bakeries, electric car manufacturers, wine cellars, the headquarters of Fortune 500 companies, local breweries, mom and pop restaurants, transloading facilities, and vintage markets. This diverse conglomeration of business and industry remains the beating heart of Seattle, and those who frequent the area understand deeply how much of an asset SODO remains for the city" (Page 54).

Technical Appendix

SODO Business Improvement Area

This appendix was created by private consultants for the SODO Business Improvement Area. The consultants provided a technical review and recommendations. In a few places, the BIA adds some context and commentary regarding local operations.

4th Ave S Changes & SODO Busway Closure

The following issues and mitigation requests to alleviate short-term and long-term closure impacts of the King County Metro dedicated busway corridor should consider:

The Draft EIS had little discussion of mitigation efforts for the SODO Busway closure; the BIA requested a more detailed analysis of impacts of the closures with specific mitigation alternatives explored, so the traffic impacts could be determined.

The Final EIS fails to provide adequate discussion on these mitigation efforts or conclusions. From Appendix N1 – Transportation Technical Report, Section 3.4.1 Long-Term Impacts, the Final EIS states:

Impacts to transit facilities would be addressed through ongoing coordination between Sound Transit, the City of Seattle, Metro, and the Federal Transit Administration to identify capital, routing, and access management strategies that would be implemented before transit service operations would be affected. Sound Transit would implement agreed-upon improvements that mitigate impacts directly associated with the project.

Closure of the SODO Busway with Preferred Option SODO-1c, Alternative SODO-1a, and Option SODO-1b would impact transit speed and reliability, and layover in the SODO area. Sound Transit has coordinated with the City of Seattle and Metro on the following mitigation strategies:

Implementation of transit speed and reliability strategies on 4th Avenue South between South Spokane Street and South Royal Brougham Way. Potential strategies could include business access and transit lanes, freight and bus lanes, or queue jump lanes.

The Busway facility will close quickly early in construction and under the Preferred Alternative close permanently. The proposal is to shift up to 40 buses per hour (one-way or two-way unsure from Section 3.4.3.1.2) onto 4th Avenue S. Mitigation explored to offset this truck and arterial corridor could include queue jumps, BAT lanes, truck/bus only lane.

Section 3.11.2.2 cites 60 - 80 buses per peak hour would be shifted to 4th Avenue S, so the above number appears to be directional.

As part of this busway closure, up to 110 on-street parking spaces, including up to four General Load Zone spaces, and up to 65 on-street parking spaces in the Duwamish Segment per Appendix N1.

Long-term impacts to freight mobility and congestion along 1st Avenue S, 4th Avenue S, 6th Avenue S, and Airport Way should be expected as buses shifted to 4th Avenue negatively impact general congestion levels and create diversion to alternative parallel routes. Increased travel time of up to 1 additional minute between S Lander and S Holgate is forecasted for all vehicles based on a VISIM analysis during construction (Section 4.4.2.2 in Appendix N1). **It is unclear as to the long-term impacts**

Technical Appendix

SODO Business Improvement Area

on 4th Avenue S due to the busway closure given the uncertainty of mitigation that could include removal of an existing travel lane/parking lane.

Loading and lead railroad tracks on the east side of the SODO Busway south of South Lander Street, including those that serve Franz Bakery and the 7th Avenue South lead tracks, would be retained. The preferred alignment of the maintenance tracks is south of the Franz maintenance building within existing Seattle ROW.

- Appendix L, Part 1 identifies these tracks as likely acquisitions.

Roadway construction closures under the Preferred Alternative should shift traffic onto vicinity arterials including:

Construction Scenario 1 – S Lander Street Closure from 4th Avenue S to 6th Avenue S (Expected Period 3.5 years)

- 400 vehicles per hour (vph) onto S Holgate Street
- 200 vph onto S Lander Street
- Undisclosed increases on 1st Avenue S, 6th Avenue S, and Airport Way S
- **BIA Commentary:**
 - S Holgate Street is a failed street with an active vacation request and planned construction from Amtrak.
 - S Holgate Street has the most dangerous rail crossing in Washington State, regularly backing up due to train traffic.
 - The existing S Lander Street overpass is only partially functional for freight operations.

Construction Scenario 2 – All Existing SB Lanes of 4th Avenue would be closed, and the entire roadway would be reduced to 2 lanes in each direction from S Hinds Street to S Spokane Street.

- 200 vph onto 1st Ave and 6th Ave
- Undisclosed increases on other east-west arterials

It should be noted that, that Loss of Service (LOS) analytics behind these construction scenarios were identified in the Final EIS; however, they show no substantial impact with closures under the Lander Street Closure scenario in Appendix N1. There was no LOS analysis performed of the 4th Avenue S closure with Scenario 2.

Likely Mitigation Issues

Parking impacts existing businesses along 4th Avenue S that rely on street parking to operate service and retail businesses. Identify property to purchase and build surface or structured parking for existing businesses in strategic locations.

Long-term impacts to freight mobility and congestion along 1st Avenue S, 4th Avenue S, 6th Avenue S, and Airport Way S should be expected as buses shifted to 4th Avenue negatively impact general congestion levels and create diversion to alternative parallel routes. Potential mitigation options:

- Require Sound Transit to grade-separate Holgate to compensate for increased congestion.

Technical Appendix

SODO Business Improvement Area

- Construct alternative routes or dedicated freight mobility route.

The proposed consolidation of bus and truck traffic along 4th Avenue S is not a viable option as “trucks require significant turning movement dimensions to perform” basic maneuvers at key intersections to access businesses, driveways, or other arterial corridors to the Port or other trucking operations.

Sound Transit’s conclusion is a general statement that leaves no specific resolution includes:

Specific mitigation for the permanent closure of the SODO Busway would be determined through coordination between Sound Transit, City of Seattle, Port of Seattle, Northwest Seaport Alliance, and King County Metro. Source: Page 4-26 | AE 0036-17 | Transportation Technical Report.

At a minimum, the SODO BIA should be included in this list of partners/stakeholders as a mandatory condition.

Temporary SODO Station on 6th Avenue S

The following issues and mitigation options to alleviate short-term impacts of closure of the existing SODO station include:

- The potential temporary station along 6th Ave S was not included in the Draft EIS.
- This plan would fully demolish the west side of 6th Ave S from S Lander St to S Holgate St.
- **There has been no opportunity for public comment on this reroute or the impacts to other transit users.**

Sound Transit proposes the study of the feasibility of building an interim station/platform in the vicinity of the existing SODO Station with connections to transit routes on 4th Avenue South and South Lander Street. Key factors that require further study are whether there are adequate access routes to an interim station given the construction in the area and the operations/regulatory considerations to build and operate an interim station.

Per Section 3.3.2.2 Construction Impacts in Appendix N1, details of construction phasing would not be finalized until final design, but a long-term (greater than 1 year without any further details) closure of the existing SODO Station is needed while the 1 Line operates on a temporary track around the construction area. There could also be short-term service interruptions for 1 Line service to relocate overhead catenary system wires and adjust the track and other related roadway and station construction. These short-term service interruptions could result in longer headways during single-track operations or complete service interruptions during nights and weekends.

A conceptual layout of the temporary station is provided in **Exhibit T-4** (Source: Appendix J, FEIS). Due to the lack of any detail of short-term construction or service-related impacts of this station closure or how it would operate on an interim basis, no specific mitigation measures can be identified.

At a minimum, the SODO BIA should work with its partner agencies and business groups to require Sound Transit to provide full disclosure of this interim station so that transit riders, businesses within the area and other existing transit transfers are full identified and mitigated.

Technical Appendix

SODO Business Improvement Area

230KV Transmission Relocation

The following issues related to relocation of the 230KV SCL transmission line within the existing KC Metro Busway include:

- The only reference to a potential powerline relocation in the Draft EIS was a schematic note within its the appendices. As such, there has been inadequate discussion for the public to comment on this matter nor was there any evaluation of its impacts disclosed or included in the FEIS.
- The Final EIS provides a very general discussion and fails to include project impacts on a major truck street and any building/private property adjacent to the footprint along the east side of 6th Avenue S.

Per 4.3.3.1 Impacts Common to All Alternatives, Appendix N1:

In the SODO and Duwamish segments, all project alternatives would require relocation of 26-kilovolt and 230-kilovolt utilities along the SODO Busway and 6th Avenue South. Construction activity would progress in stages along the corridors such that closures would be localized rather than closing the entire corridor at once. South Holgate Street and South Lander Street would each have partial closures at the SODO Busway for up to one month at a time. One to two lanes of 6th Avenue South would be closed at a time, with each closure lasting up to 4 months.

Full closures of 6th Avenue South would also occur between South Massachusetts Street and South Spokane Street and between Diagonal Avenue and South Hinds Street. Intersection closures could also occur during overnight hours. Because these are short-term closures (less than 1 year), they are not quantitatively analyzed in further detail. Additional road or lane closures may be needed for utility relocation, which will be determined during final design in coordination with the utility owner.

It should be noted that any overnight closures would have direct impact onto Franz Bakery and potentially other industrial/manufacturing uses that are accessed via 6th Avenue S.

There are no specific exhibits of the exact alignment or spacing of tall transmission poles to complete this power line relocation, however, generally the alignment is identified along the east side of 6th Avenue S with an averaged 50-foot-wide area shown as relocation area (beginning in Appendix J, Sheet L50-GSP017).

Pacific Iron & Metal

The following issues related to relocation of the property impacts on the properties of Pacific Iron & Metal (immediately north of the SODO UPSP facility) include:

- Despite the Sound Transit Board directing staff to avoid Pacific Iron & Metal property, the Final EIS clearly shows the preferred alternative station footprint on Pacific Iron & Metal property and utilization of a long-term lease they have with the City of Seattle within the undeveloped S Walker Street ROW.
- Pacific Iron & Metal plays a critical role to municipal function throughout the central Puget Sound region, and their water treatment system may likely be harmed by Sound Transit's

Technical Appendix

SODO Business Improvement Area

plans (although no details of property impact within the SE quadrant of their site are currently known).

- Concerns also exist surrounding the changes to 4th Ave S (outlined above and how this may impact their critical functions, parking allowances currently along the eastern side of 4th Avenue S or their access driveways.

Page L4.1-2, Appendix L, identifies Pacific Iron & Metal with potential property impacts under all Alternatives. The Preferred Option SODO-1c would be an at-grade station immediately adjacent to the Pacific Iron & Metal properties. Detailed review of the 30% plans reveals a small property acquisition that appears to be beyond the current fence of the property within the railway track area. No significant impact of the preferred alternative is expected directly onto their property, except for loss of on-street parking along 4th Avenue S.

The most northern portion of the Pacific Iron & Metal property is within the S Walker Street City ROW. It is unclear if any of this area is proposed by ST for station emergency egress areas or not.

See attached **Exhibit T-2** with notes.

USPS Building Access & Lander Street Overpass

The following issues related to the proposed Lander Street Overpass and access to the existing SODO USPS Building and Distribution Facility include:

- Limited discussion and schematics on the proposed overpass make it difficult to determine functionality and impacts.
- We know that to build this overpass, there will be significant changes to 4th Ave S, 6th Ave S, and the existing overpass to the west (between 3rd Avenue S and 1st Avenue S) along S Lander Street.
- The design is expected to create a new elevation in a flat area, hindering freight mobility and generating storm drainage impacts yet to be disclosed.
- The only location for the USPS to receive large freight deliveries is via an existing at-grade garage access on S Lander Street. The Final EIS does provide some language around retaining access to the USPS facility from the south.
- USPS remains concerned that the West Seattle Link Extension will negatively impact their operations, and the BIA has attempted to facilitate meetings between the USPS and Sound Transit since the DEIS was published.

The Preferred Option SODO-1c, Alternative SODO-1a, and Option SODO-1b would build a new South Lander Street vehicle overpass above the light rail tracks between 4th Avenue South and 6th Avenue South. The overpass would likely impact the existing semi-truck and garage access to the United States Postal Service Carrier Annex and Distribution Center/Terminal Post Office. Sound Transit proposes to provide alternative access to this garage via demolition of an existing building south of South Lander Street with an at-grade driveway onto 4th Avenue South.

Technical Appendix

SODO Business Improvement Area

It is unclear if adequate vertical clearance between the proposed new access roadway and the grade-separated bridge structure of South Lander Street would provide a minimum of 15 feet, as there are no design details within the FEIS that addresses this vertical clearance. Additionally, it is unclear how truck accessibility to the existing garage entry can be completed at a new location onto 4th Avenue S given its proximity to the signalized intersection of 4th Avenue S and S Lander Street (i.e., turning conflicts and truck turning radius requirements for WB-67 or WB-72 design vehicles).

Require Sound Transit to provide to-scale drawings of 30% plans of vertical elements of Lander Street Overpass between 4th Avenue and 6th Avenue S along South Lander Street.

Require Sound Transit to perform Autoturn analysis of WB-67 or WB-72 design vehicles with site access routing to USPS buildings/garage and how access onto 4th Avenue S would be provided for large vehicles. Require Sound Transit and SDOT to coordinate directly with USPS on new truck route to the identified route under the new Lander Street overpass.

The proposed consolidation of bus and truck traffic along 4th Avenue S is not a viable option as “trucks require significant turning movement dimensions to perform” basic maneuvers at key intersections to access businesses, driveways, or other arterial corridors to Port or other trucking operations. A dedicated median within 4th Avenue S may be likely to ensure no impacts to USPS truck access.

See attached **Exhibit T-1** with notes.

Franz Bakery

The following issues related to the Franz Bakery production facility include:

- Franz Bakery and its rail system was identified as being impacted by the FEIS, though the impacts in review of the 30% plans appear to be minimal under the Preferred Alternative.
- The rail lines servicing Franz may all be acquired by Sound Transit. Although there is a specific mention that rails alongside the building will remain functional in Appendix N1 (Section 9.1.3 where...*loading and lead tracks on the east side of the SODO Busway south of South Lander Street, including those that serve Franz Bakery and the 7th Avenue South lead tracks, would be retained. No other long-term effects to rail operations are expected*).

The Preferred Option DUWA-1a would a grade-separated track alignment immediately south of the existing Franz Bakery maintenance building within the S Hanford Street ROW. Detailed review of the 30% plans reveals a small property acquisition immediately west of this building, a small triangle piece southeast of the rail spur and likely an aerial easement sliver along the southern property boundary. No significant impact of the preferred alternative is expected directly onto the property, except for loss of a circulation/parking area within the existing S Hanford Street City ROW.

Impacts from the new 230KV Power Line along 6th Avenue S on Franz Bakery site are unclear. Short-term impacts of power loss during any period would be significant at this facility manufactures a wide variety of bread products 24-hours every day of the week.

Construction of the new aerial maintenance track within the S Hanford Street ROW could generate potential short-term impacts to rail spur tracks that serve the Franz Bakery. The ownership group of the Franz Bakery property and building have been in direct contact with Sound Transit since the DEIS was

Technical Appendix

SODO Business Improvement Area

released and contingency plans are being identified for truck deliveries or delayed rail delivery options in case of track closures or ground settlement occurs during construction of large piers to support the new aerial maintenance tracks. It is expected that ground stabilization measures will be included in the detailed construction drawings once the design has progressed further than the current 30% level.

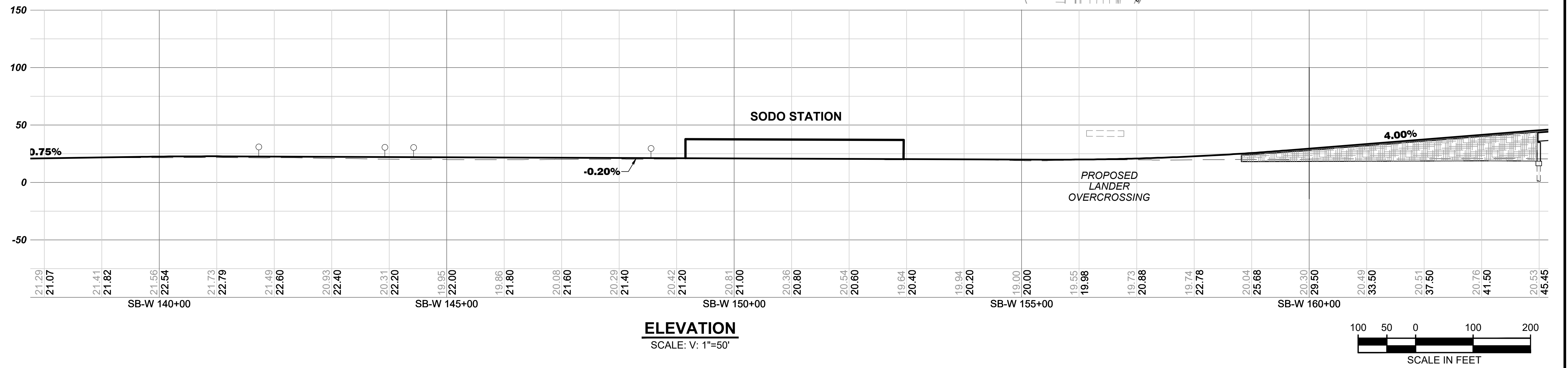
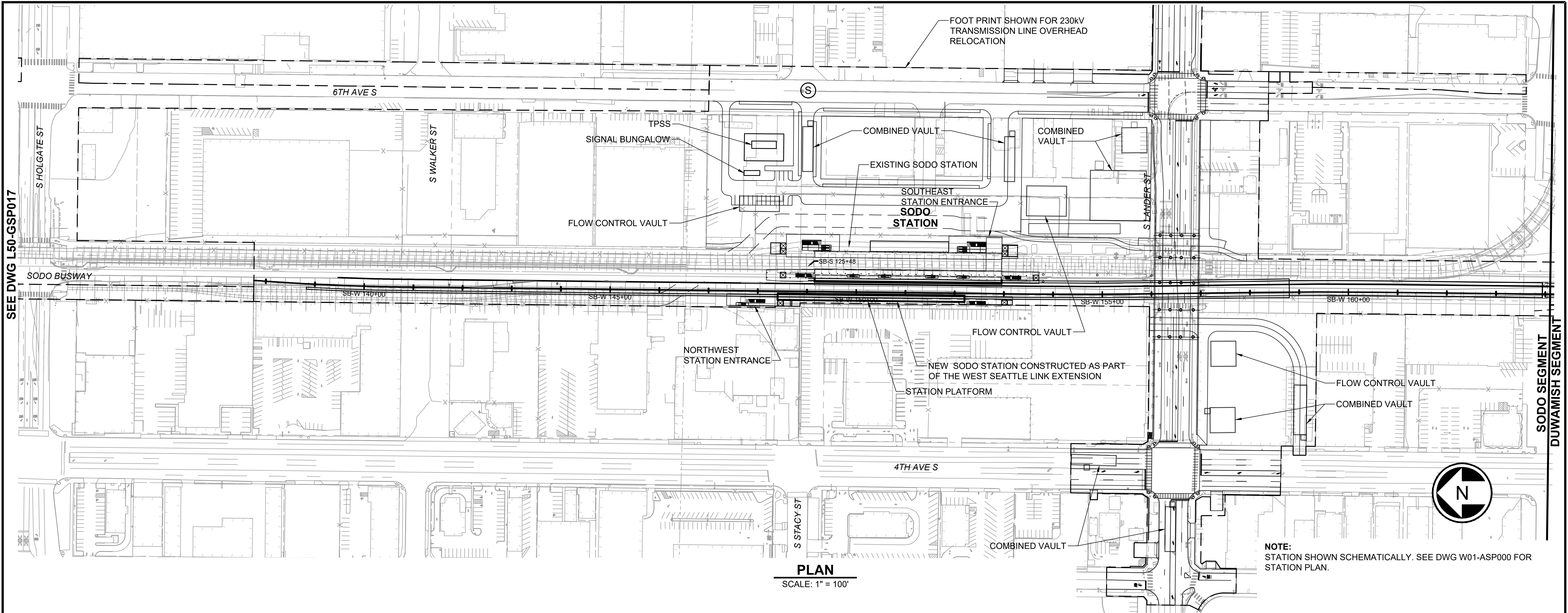
See attached **Exhibit T-3** with notes.

SODO Trail Mitigation

The following issues related to the SODO Trail include:

- The Final EIS identifies (in Section 6.3.2.2 Construction Impacts) that the SODO Trail will be closed for up to 4 years under all the Alternatives between South Stacy Street and South Forest Street. Pedestrians and bicycles would likely be detoured to 6th Avenue South, approximately 280 feet to the east, with east-west access maintained at adjacent street crossings. Sound Transit will work with the City of Seattle to identify and implement a design on 6th Avenue South (or other location as agreed upon) that achieves, to the extent feasible, a similar level of protection and comfort as the affected facility. Per Page 7-15, Appendix N1, the FEIS states that....*depending on the selected design, this detour onto 6th Avenue S could increase users' exposure to, and potential conflicts with vehicles.*
- In addition, under Preferred Option SODO-1c, Alternative SODO-1a, and Option SODO-1b, the sidewalks on both sides of South Lander Street between 4th Avenue South and 6th Avenue South would be closed for approximately 3 years during construction of the South Lander Street overpass.
- It is unclear how pedestrians and bikes can remain safe along 6th Avenue S which along its length would also experience closures for rail facility construction and 230KV transmission relocation activities or be provided clear SODO station accessibility for the transit user destined to the SODO Business District.

SEE DWG L50-GSP017



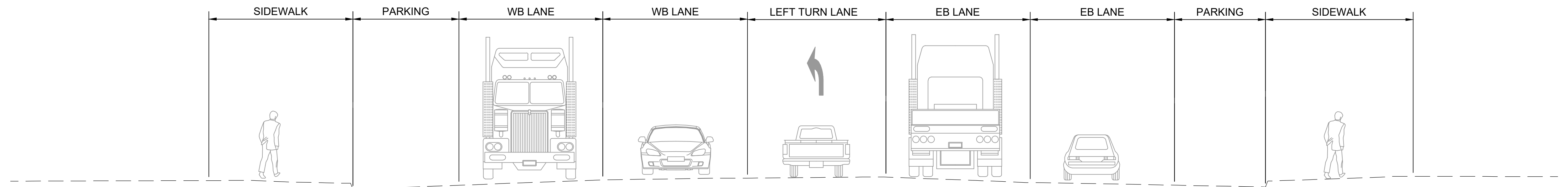
EXIHIBIT T-1

WEST SEATTLE LINK EXTENSION

FINAL EIS - CONCEPTUAL DESIGN
SODO SEGMENT
PREFERRED AT-GRADE LANDER ACCESS STATION OPTION (SODO-1c)
PLAN AND PROFILE

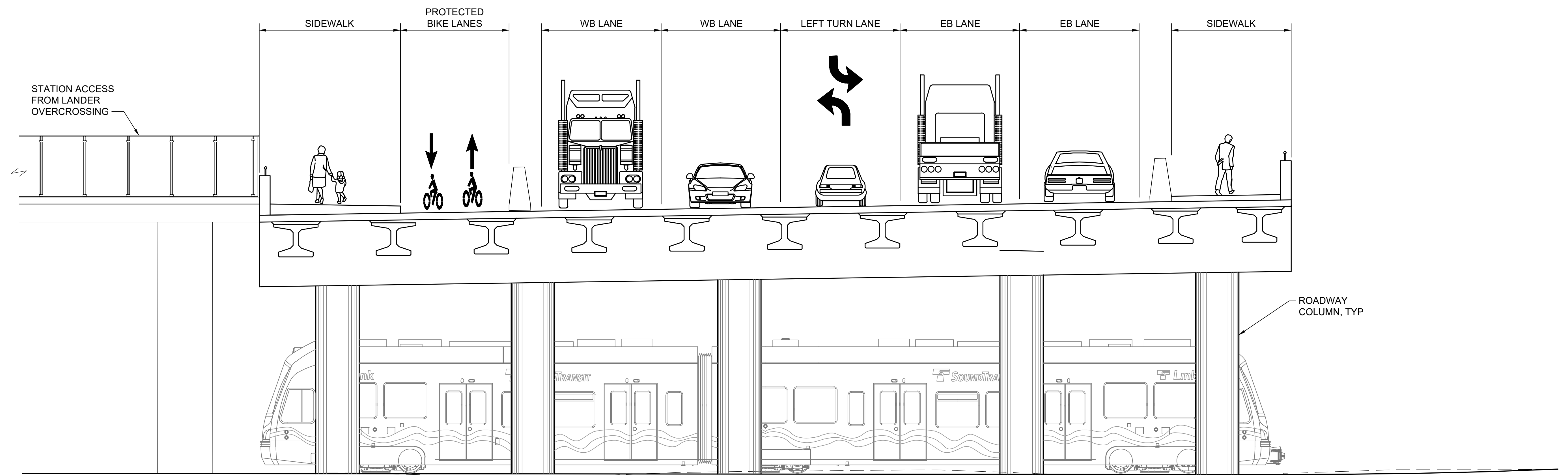
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EXISTING ROADWAY SECTION - S LANDER ST (LOOKING EAST)

NTS



PROPOSED ROADWAY SECTION - S LANDER ST (LOOKING EAST)

NTS

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EXHIBIT T-1

WEST SEATTLE LINK EXTENSION

FINAL EIS - CONCEPTUAL DESIGN
SODO SEGMENT
S LANDER STREET
SODO-1a, SODO-1b, AND SODO-1c
ROADWAY TYPICAL SECTION

L50-CYX105

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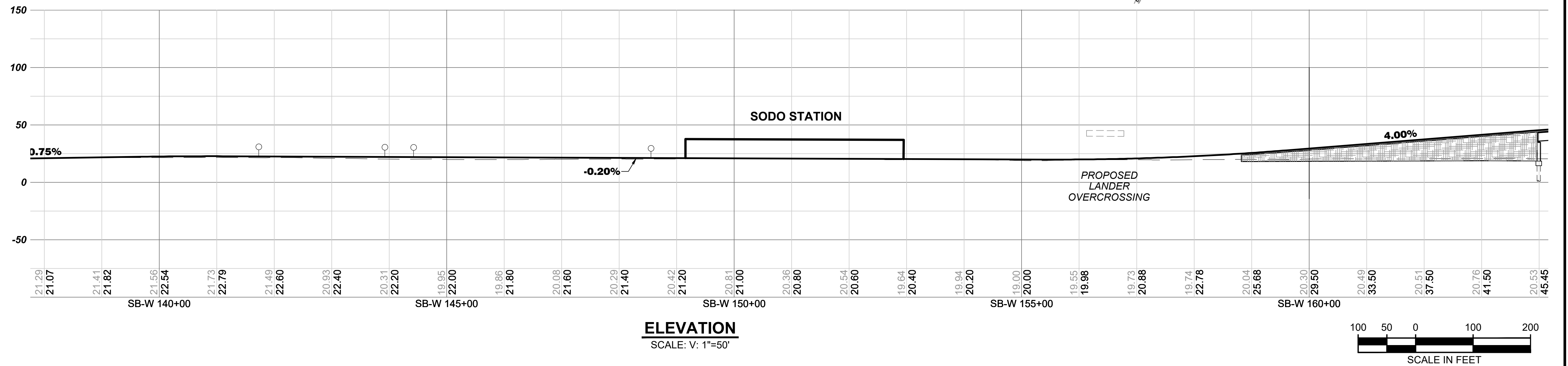
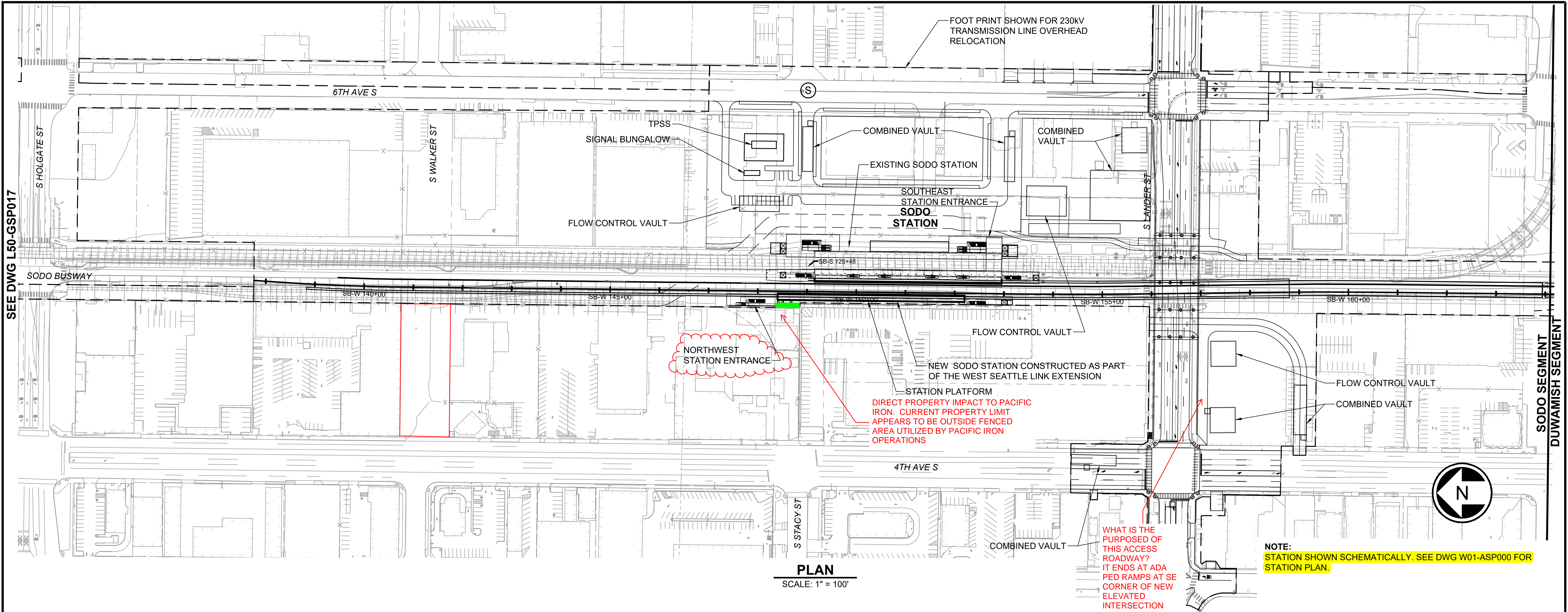


EXHIBIT T-2

WEST SEATTLE LINK EXTENSION

FINAL EIS - CONCEPTUAL DESIGN
SODO SEGMENT
PREFERRED AT-GRADE LANDER ACCESS STATION OPTION (SODO-1c)
PLAN AND PROFILE

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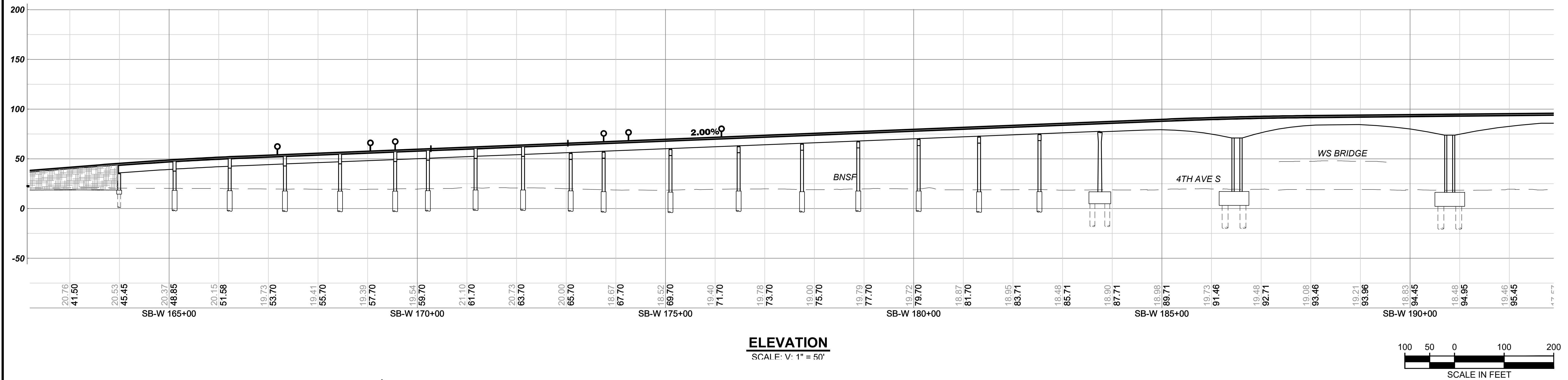
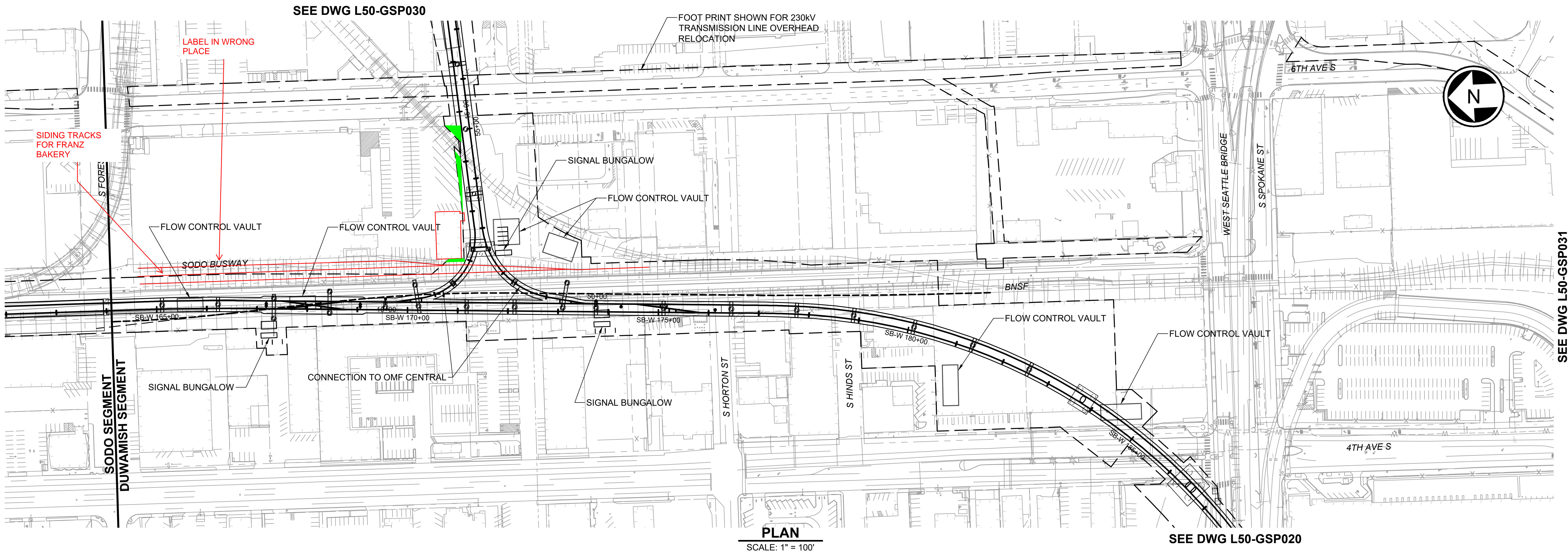


EXHIBIT T-3

WEST SEATTLE LINK EXTENSION

FINAL EIS - CONCEPTUAL DESIGN
DUWAMISH SEGMENT
PREFERRED SOUTH CROSSING ALTERNATIVE (DUW-1a)
PLAN AND PROFILE

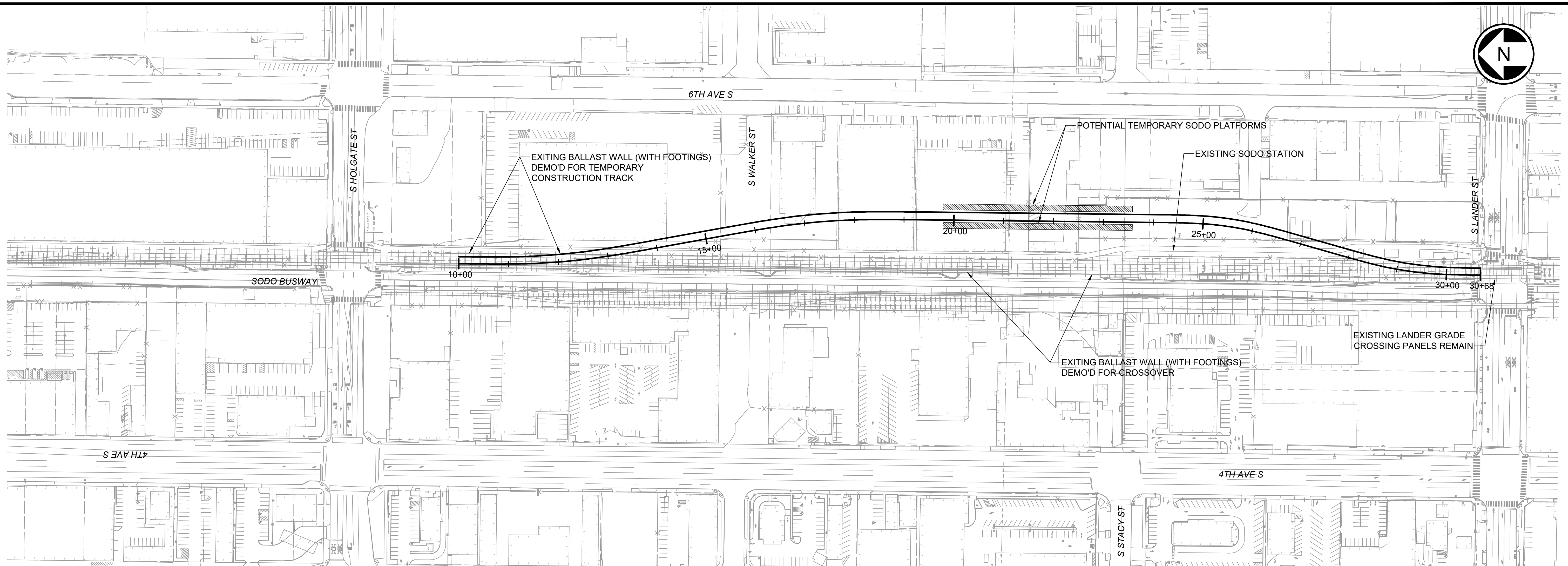
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PLAN
SCALE: 1" = 100'

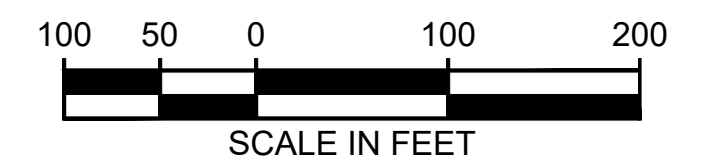


EXHIBIT T-4

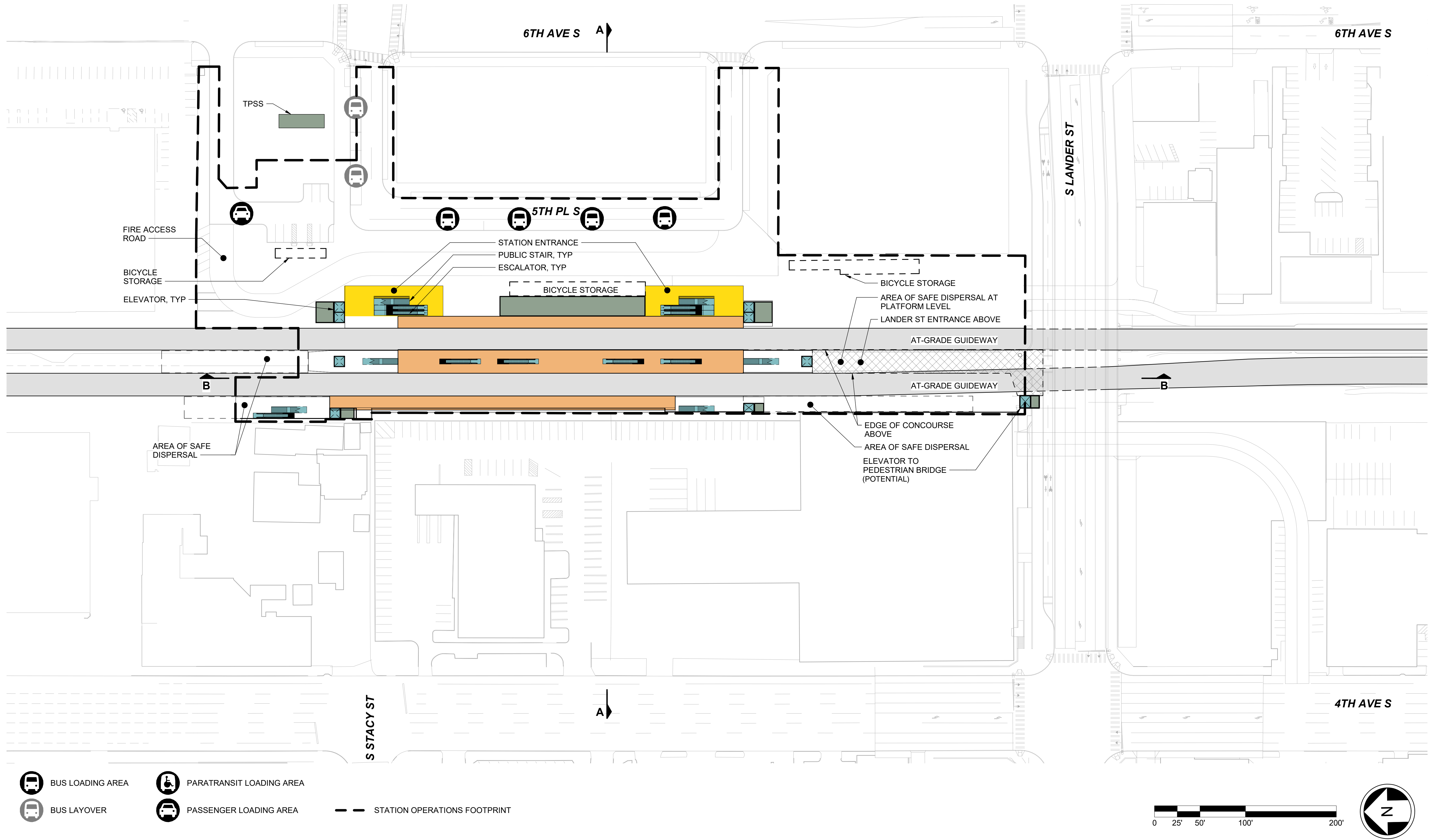
WEST SEATTLE LINK EXTENSION

FINAL EIS - CONCEPTUAL DESIGN
SODO SEGMENT
TEMPORARY CONSTRUCTION TRACK
PLAN AND PROFILE

L50-GSP008

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WEST SEATTLE LINK EXTENSION

EXHIBIT T-4

FINAL EIS - CONCEPTUAL DESIGN
SODO SEGMENT
PREFERRED AT-GRADE LANDER ACCESS STATION OPTION (SODO-1c)
SITE PLAN

W01-ASP000

LOC. ID: W01
PG. #: 19
03/2023

Appendix C. Comments Received on the Final EIS and Responses

Communication ID: 555600 – SODO BIA

#	Comments	Responses
1	<p>4th Avenue S Changes & Busway Mitigation</p> <p>Between 1,440 and 1,920 buses will use 4th Avenue S every day due to the permanent closure of the SODO Busway, likely triggering a full rework of 4th Avenue S between S Spokane Street and S Holgate Street. The Final EIS does not identify a mitigation strategy and provides inadequate detail on the associated impacts and project sequencing. Analyses conducted are misaligned with SODO operations.</p>	<p>Please see Section 3.4, Affected Environment and Impacts during Operation – Transit, and Section 3.11, Construction Impacts, of Chapter 3, Transportation Environment and Consequences, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on permanent impacts to the SODO Busway and proposed mitigation. Mitigation for the SODO busway was developed in coordination with King County Metro and the City of Seattle.</p> <p>Mitigation measures for the West Seattle Link Extension are described in the West Seattle Link Extension Final EIS consistent with the current level of project design and the requirements of the environmental review process. Mitigation measures are detailed in Chapter 3, Transportation Environment and Consequences, and Chapter 4, Affected Environment and Environmental Consequences, for all alternatives. Appendix I, Mitigation Plan, includes detailed mitigation measures for the preferred alternatives evaluated in the Final EIS.</p> <p>Mitigation measures will continue to be refined through final design and as the project goes through the permitting phases and process. Sound Transit is committed to satisfying all applicable federal, state, and local environmental regulations and to responsibly and reasonably mitigate significant adverse environmental project impacts consistent with Sound Transit policies and applicable regulations.</p>
2	<p>Potential Temporary Station</p> <p>In the Final EIS, Sound Transit introduced a potential temporary station for the 1 Line during construction. This is a completely new project element with extensive impacts to transit users, businesses, and property owners that has had no public input.</p>	<p>As project design advances, more information is known about project needs during construction. The potential need for a temporary station and track during construction of the new station in SODO was identified by the project team based on additional analysis of construction phasing conducted between the West Seattle and Ballard Link Extension (WSBLE) Draft EIS and West Seattle Link Extension Final EIS. The temporary track and potential temporary station were included to reduce impacts to light rail riders during construction. This temporary station and track are proposed on properties identified as affected in the WSBLE Draft EIS and does not increase the number of property acquisitions over that identified in the WSBLE Draft EIS. Potential temporary construction impacts for the SODO Station area were updated in the Final EIS to reflect this updated analysis.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
		<p>Property owners were notified that their properties were potentially affected by one or more alternatives for the WSBLE project in fall 2021, prior to publication of the WSBLE Draft EIS. These letters invited property owners to meet with Sound Transit to find out more about the project and the property acquisition process. Similar letters were again sent prior to publication of the Final EIS in summer of 2024.</p> <p>Consistent with the State Environmental Protection Act (SEPA), the West Seattle Link Extension Final EIS provides the public and decision makers with information about the West Seattle Link Extension “at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified” (Washington Administrative Code [WAC] 197-11-055(2)). This is also consistent with the National Environmental Policy Act (NEPA), which provides that “Agencies shall integrate the NEPA process with other planning at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts” (40 Code of Federal Regulations 1501.2). The EIS has been prepared using approximately 10 to 15 percent level of design. This level of design allows for meaningful evaluation of alternatives, impacts, and potential mitigation measures. As noted in several places in the Final EIS, after a decision has been made to select the project to be built, the project would undergo additional engineering and design and mitigation measures would be refined. SEPA acknowledges that “the EIS need not analyze measures in detail” (WAC 197-11-440(6)(c)(iv)). Specific mitigation measures would be developed during the final design, and permitting phases and process would be coordinated with local permitting authorities.</p>
3	<p>230-kV Power Line Relocation & 6th Avenue S</p> <p>Sound Transit needs to relocate high-voltage power lines from the SODO Busway to build the new light rail line, but the Final EIS fails to identify property and right-of-way impacts. Other, non-Final EIS documents suggest property demolition will be a part of this work. According to the Final EIS, 6th Avenue S is expected to experience full closure for indeterminate periods of time, and due to Seattle’s Compete Streets</p>	<p>Properties that would be acquired for the 230-kilovolt power line relocation are identified in Appendix L4.1, Acquisitions, Displacements, and Relocations, of the Final EIS. As stated in Section 4.1, Acquisitions, Displacements, and Relocations, of the Final EIS, “...the project would require easements, such as subsurface easements, aerial easements, and temporary construction easements. These easements would not require displacement of surface uses, and the easement area is not included in the data presented here.” 6th Avenue South was included in construction footprints used for</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>Ordinance, the power line relocation may also require a full rework of 6th Avenue S. Furthermore, Sound Transit incorrectly asserts, "Effects to future land uses are anticipated to be minimal because this area is within the Duwamish Manufacturing/Industrial Center and redevelopment into denser land uses is not anticipated in the City of Seattle Comprehensive Plan" (Page 4.2-12). However, in 2023, the City of Seattle completed the Industrial & Maritime Strategy which created a new zoning category of Industry and Innovation zone in this area that would support denser development.</p>	<p>analysis in the Final EIS and impacts to the roadway during construction are discussed in Chapter 3, Transportation Environment and Consequences, and Appendix N.1, Transportation Technical Report.</p> <p>The City of Seattle updated zoning in October 2023 to be consistent with the Industrial and Maritime Strategy. Analysis for the Final EIS was completed in September 2023 and therefore does not include the October 2023 zoning changes.</p> <p>Direct land use impacts are determined by conversion of land to a transportation use. The Final EIS analysis includes conversion of industrial land to a permanent transportation use.</p>
4	<p>Sequencing, Connectivity & Mobility</p> <p>The West Seattle Link Extension will require extensive changes and closures to 4th Avenue S, 6th Avenue S, the SODO Busway, and S Lander Street. While potential timing is highlighted for some individual elements of construction on these roadways, there is little consideration to sequencing these changes to reduce the impacts to businesses and maintain functionality in the district. All modes of transportation are expected to feel the impact of these closures, especially freight and transit as key connectors lose functionality throughout the life of the project and beyond. Little-to-no thought is given to the pedestrian experience during construction.</p>	<p>Construction impacts presented in Section 3.11.2, SODO Segment, of the Final EIS and Section 4 of Appendix N.1 to the Final EIS describe impacts to roadways in SODO during construction and potential mitigation. For example, mitigation includes development of a Construction Access and Traffic Management Plan for the project to include maintaining business access; minimizing construction disruption during large events; providing alternate routes for freight, general traffic, and non-motorized access; parking management; pavement restoration as appropriate; and maintaining transit operations. Mitigation also includes coordination of closures of parallel arterials or access points with the goal of avoiding simultaneous closures. See response to comment 1 regarding the level of detail provided for mitigation measures in the Final EIS.</p>
5	<p>Pre-Construction & FIFA World Cup</p> <p>Based off of previous conversations with Sound Transit staff, mitigation projects, such as the 4th Avenue S rework or the 230-kV power line relocation, may start before official construction begins in 2027. The lack of detail regarding project scope, sequencing, timing, and impact for any pre-2027 work is worrisome given the crowds anticipated for the FIFA World Cup in 2026, and the FIFA World Club Cup in 2025. It is extremely concerning that we may be functioning at reduced capacity and on temporary routes with nearly a million people coming to SODO.</p>	<p>See response to comments 2 and 4.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
6	<p>S Lander Street Overpass</p> <p>The Final EIS contains minimal discussion and drawings of the proposed overpass at S Lander Street between 6th Avenue S & 4th Avenue S. It is highly unlikely that the overpass can be built without significant changes to these intersections, including raising them several feet and adding hills to a flat area, which will hinder freight and pedestrian mobility.</p>	<p>Please see Appendix J of the Final EIS for conceptual design drawings. Transportation impacts related to this project element are described in Chapter 3, Transportation Environment and Consequences. See response to comment 2 regarding the level of detail provided in the Final EIS.</p>
7	<p>SODO Trail Mitigation</p> <p>The Final EIS identifies the SODO Trail will be moved to 6th Avenue S, but there are no specific plans to explain what this will look like during the construction period or how it will integrate with other mitigation efforts.</p>	<p>Information on construction impacts in Section 3.11.2, SODO Segment, of the Final EIS identifies 6th Avenue South as the likely detour route for the SODO Trail. The specific design of the facility would be determined in collaboration with the City and other stakeholders. See response to comment 1 regarding the level of detail provided in mitigation measures.</p>
8	<p>Advancing the West Seattle Link Extension forward would be highly irresponsible at this time. With the extensive issues in the Final EIS, an opaque planning process, and large cost increases, Sound Transit staff have put the Board of Directors in an uncomfortable and difficult position. Conducting a supplemental EIS is an opportunity for Sound Transit staff to address significant issues while re-instilling trust and accountability.</p>	<p>The Sound Transit Board considers a number of factors in selecting the project to be built. Those factors include potential environmental impacts; equity; Tribe, agency, business, community organization, and public comments; cost; schedule; ridership; and potential long-term benefits.</p> <p>See response to comment 2 regarding the level of detail provided in the final EIS.</p>
9	<p>One of the best ways Sound Transit and the City of Seattle can help the SODO BIA is by entering into a Memorandum of Agreement that will protect in place SODO's businesses, workers, residents, and commuters, and provide a high-performing multi-modal transportation network. This should include a SODO/Duwamish Community Advisory Group; Neighborhood Traffic Mitigation Committee, Construction Hub Coordinator, Land Use planning, regular in-person/on-site information and meetings with SODO BIA leadership, and a Mitigation Fund.</p>	<p>Sound Transit will take your suggestions into consideration and coordinate with the SODO Business Improvement Area (BIA) and the City of Seattle regarding your concerns.</p>

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Appendix C- Community Organization Comments

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Subject	10/10 System Expansion Committee Meeting Public Comment:
From	Darcell Slovek-Walker
To	Meeting Comments
Sent	Wednesday, October 9, 2024 4:18 PM

October 9, 2024

Dear Members of the System Expansion Committee,

On behalf of the staff and Board of Directors of Transitional Resources, we would like to extend our sincere gratitude to you and your team for your ongoing efforts to preserve our organization throughout Sound Transit's WSLE project. Your team's diligence and attention during this process means so much to our community as we work to provide the most essential services of permanent housing and behavioral health treatment to those in need.

We understand the complexity and challenges associated with large-scale transit projects, and we deeply appreciate your willingness to consider the impact on our facilities and services. We have reviewed the most recent preferred alternative route, DEL-6b, and feel it is a viable option that preserves Transitional Resources' housing and services. This is critical to our organization and the people we serve.

At the same time, we hope you will also consider preserving our surrounding community as well. Our neighbors embrace Transitional Resources' mission and are an integral part of our clients recovery. WSJ-6 No Avalon Station with DEL-7 Tunnel Entrance at SW Yancy North Side & East of SW Avalon Way not only keeps our neighborhood whole, but we feel it is best for all of West Seattle. It is less expensive, reduces the amount of track and the height of the track that is above ground, displaces fewer businesses and residences, and should be less disruptive in the construction process.

We urge you to consider the option that not only saves Transitional Resources, but our nearby community as well. This will satisfy the community's needs and create a more equitable and accessible region for all. Thank you again for your consideration and dedication to the needs of our clients, our client's families, our staff, and the needs of our community. Your efforts are greatly appreciated.

Kind regards,

Miriam Chilton

Darcell Slovek-Walker Acting President and Treasurer

Chief Executive Officer Transitional Resources' Board of Directors

Darcell Slovek-Walker, MA, LMHC
Chief Executive Officer
Transitional Resources
(206) 883-2026

Appendix C. Comments Received on the Final EIS and Responses

Communication ID: 555338 – Transitional Resources Board of Directors

#	Comments	Responses
1	<p>We understand the complexity and challenges associated with large-scale transit projects, and we deeply appreciate your willingness to consider the impact on our facilities and services. We have reviewed the most recent preferred alternative route, DEL-6b, and feel it is a viable option that preserves Transitional Resources' housing and services. This is critical to our organization and the people we serve.</p>	<p>Your support for Preferred Option DEL-6b has been noted.</p>
2	<p>At the same time, we hope you will also consider preserving our surrounding community as well. Our neighbors embrace Transitional Resources' mission and are an integral part of our clients recovery. WSJ-6 No Avalon Station with DEL-7 Tunnel Entrance at SW Yancy North Side & East of SW Avalon Way not only keeps our neighborhood whole, but we feel it is best for all of West Seattle. It is less expensive, reduces the amount of track and the height of the track that is above ground, displaces fewer businesses and residences, and should be less disruptive in the construction process.</p> <p>We urge you to consider the option that not only saves Transitional Resources, but our nearby community as well. This will satisfy the community's needs and create a more equitable and accessible region for all.</p>	<p>Your support for Alternatives DEL-7 and WSJ-6 has been noted.</p> <p>Sound Transit has adjusted alternatives during conceptual design to avoid or minimize impacts, including property acquisitions, to the extent possible. Refinement of project design will continue throughout final design.</p>

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Subject	Comment from SmarterTransit.org to the Sound Transit Board of Directors about the West Seattle project
From	John Niles
To	Email The Board
Cc	Maggie Fimia
Sent	Thursday, October 10, 2024 11:22 AM
Attachments	< 10.10.24 Comment to the Sound Transit Board of Directors.pdf >

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Sound Transit Board Members:

FYI, please see attached for an on-record comment on WSLE from SmarterTransit.org. It's about what the FEIS reports on that project.

Thank you,
John Niles
206-781-4475

--

John S. Niles

Seattle citizen and Sound Transit customer

Founder and Co-chair, Smarter Transit

President, Global Telematics | globaltelematics.com | [linkedin.com/in/globaltelematics/](https://www.linkedin.com/in/globaltelematics/)

Executive Research Director, CATES -- Center for Advanced Transportation and Energy Solutions

Research Associate, Mineta Transportation Institute, San José State University

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**Comment to the Sound Transit Board of Directors
System Expansion Committee Meeting of 10.10.24
from [John Niles and Maggie Fimia, Co-Chairs](#) of [SmarterTransit.org](#)**

We invite your attention below to this October 8th analysis of the West Seattle Link Light Rail Extension by Charles Prestrud, WSDOT's former planning manager for King and Snohomish counties, and prior to joining WSDOT, system planning manager for Community Transit.

We've highlighted major points.

In summary, we strongly agree with Mr. Prestrud's concluding paragraph in this essay:

In 1996, 2008, and 2016 Sound Transit sold voters on the idea that building a light rail system was the solution to the region's growing transportation needs. Now the FEIS for West Seattle extension project shows that the agency's rigid adherence to light rail has become the obstacle to consideration of far more cost-effective alternatives.

We thus urge the Board to respond to the WSLE FEIS and draft Resolution 2024-22 by selecting the No Build alternative and ordering consideration of more cost-effective alternatives aligned with Sound Transit's authority, such as those mentioned in the essay by Mr. Prestrud. Board members have the authority and the responsibility to spend taxpayers' dollars wisely.

Please do the right thing for our Region.

The West Seattle Link Extension has gone off the Rails



- [CHARLES PRESTRUD](#), Director, Washington Policy Center, Coles Center for Transportation

On September 20th Sound Transit published the Final Environmental Impact Statement (FEIS) for the proposed light rail extension to West Seattle. Ordinarily, publishing the FEIS is one of the final steps in the decision-making process with subsequent Board approval only a formality.

“The West Seattle Link Extension has gone off the rails” continued

However, in this instance information revealed in the FEIS is so unfavorable the Board may realize it is time to reconsider whether it makes sense to proceed as planned.

The news that got the Board’s attention was a cost increase from the 2023 estimate of \$4 billion to somewhere between \$5.1 and \$5.6 billion. The bad news didn’t end there. Sound Transit staff then offered an even higher “opinion of probable cost” of between \$6.7 and \$7.1 billion, which is “based on a different cost estimating methodology and considers potential savings due to value engineering and other agency changes.” This ought to raise the question of what a realistic “probable cost” would be without the “potential savings.”

The new estimate is about triple the cost estimate provided in 2016 when the ST3 plan was approved, which, at \$2.3 billion, was hardly a bargain. The revised cost is over \$1.5 billion per mile for a line that is only four miles long and adds just four stations. On a per-mile basis that would make it one of the costliest light rail lines in the world, but nowhere near the most productive.

The Sound Transit Board seemed surprised at the cost increase, but they had every reason to expect the West Seattle extension would be difficult and expensive. The proposed alignment runs through built-up areas, most of the line needs to be elevated or in tunnels, a tall bridge over the Duwamish River will be needed, and considerable right-of-way will need to be purchased from businesses and homeowners. Even if Sound Transit didn’t have a twenty-year history of large cost over-runs on rail projects, the West Seattle extension had obvious challenges and risks likely to drive up the cost.

In the past Sound Transit has been resourceful in handling cost overruns. A combination of strategies including pushing out completion dates, increasing debt, and securing additional federal funding has allowed projects to go forward, even if much more slowly than originally promised. Now, however, Sound Transit is approaching its debt limit. The agency’s financial plan already assumes issuance of \$24.7 billion in bonds through 2046, plus another \$4.2 billion in federal loans to be repaid. By 2038 Sound Transit expects to pay over a billion dollars per year in debt service. Therefore, piling on more debt would be problematic, and in any case wouldn’t improve performance of the project, only make the ultimate cost even higher.

Faced with this difficult situation, a financially prudent governing board would ask whether it makes sense to proceed with a project that has tripled in cost and busts the budget, but the Sound Transit Board has taken a different approach. In board motion M2024-59 Sound Transit directs staff to “...develop a workplan on the programmatic, financial, and project level measures and opportunities the agency will pursue to improve the agency’s financial situation and move WSLE through design to inform a financially sound project to be baselined...”. What the motion does not do is develop alternatives or ask whether the project still makes sense. And, in case you were wondering, “baselined” is a sort of euphemism for moving the goal posts.

The Board’s motion shows that Sound Transit is approaching the problem as though it is just about the agency budget, but that narrow view ignores the bigger question raised by the FEIS, which is that despite the extravagant cost the project accomplishes very little. The fine print of the FEIS reveals total transit ridership in the region under the No-Build alternative would produce 99.7% of the ridership of the light rail alternative. In other words, the light rail extension would produce less than a one percent increase in total transit ridership for an investment of

“The West Seattle Link Extension has gone off the rails” continued

over \$6 billion. That is an exceedingly poor return on such a massive investment. You might be hoping that even if the project doesn't do much to increase ridership it might reduce congestion or greenhouse gas emissions. Alas, the FEIS also informs us that vehicle hours of delay would change by less than one half of one percent, and total vehicle miles travelled changes even less, just two tenths of one percent. As result, the West Seattle extension will not reduce greenhouse gas emissions, improve transportation system efficiency, or meaningfully improve the mobility of West Seattle residents.

Why does spending billions of dollars on a light rail line accomplish so little? Part of the reason is that King County Metro already provides RapidRide express bus service along the same route. The incremental improvement in service that light rail might provide is very small, in fact so small that it attracts very few new riders. The existing RapidRide service also has the advantage that it starts farther south and continues through downtown to the South Lake Union area. In contrast, the light rail line would serve only three stops in West Seattle, require transfers to reach other destinations, and be useless for most trips that West Seattle residents make.

The success of the RapidRide routes suggests a solution to Sound Transit's problem. It wouldn't be difficult to further enhance RapidRide service so it served more destinations and ran more frequently. The RapidRide C line already benefits from bus-only lanes on the West Seattle Bridge, HWY 99, and Westlake Ave. Additional transit priority improvements could be made to increase speed and reliability.

Transit planning should also recognize that many West Seattle residents travel to Renton, South Center, Auburn and Kent. None of those places are served by light rail but all could easily be served by expanded bus service. That would cost only a small fraction of what Sound Transit proposes to spend on the light rail extension, and the service could be added much sooner without having to condemn property, bulldoze homes, and cut down trees, all of which would happen if the preferred light rail project goes forward. Sound Transit, if they were forward thinking, could also begin to plan for ways to improve local circulation and connections to neighborhoods with automated vehicles. The rapid pace of autonomous vehicle development suggests such vehicles may be widely available years before the light rail line would be in service.

If the Sound Transit Board insists on viewing the situation as just a budget problem, they are likely to discover there is no good solution. If, however, they broaden their thinking to consider alternatives to light rail they will discover there are vastly superior ways of improving mobility. Rather than directing staff to find new revenue the Board should request an analysis of lower cost and lower risk alternatives. That should include a benefit/cost analysis that provides an objective basis for comparison of the possible alternatives.

In 1996, 2008, and 2016 Sound Transit sold voters on the idea that building a light rail system was the solution to the region's growing transportation needs. Now the FEIS for West Seattle extension project shows that the agency's rigid adherence to light rail has become the obstacle to consideration of far more cost-effective alternatives.

Appendix C. Comments Received on the Final EIS and Responses

Communication ID: 555405 – Smarter Transit

#	Comments	Responses
1	<p>In summary, we strongly agree with Mr. Prestrud's concluding paragraph in this essay:</p> <p>In 1996, 2008, and 2016 Sound Transit sold voters on the idea that building a light rail system was the solution to the region's growing transportation needs. Now the FEIS for West Seattle extension project shows that the agency's rigid adherence to light rail has become the obstacle to consideration of far more cost-effective alternatives.</p> <p>We thus urge the Board to respond to the WSLE FEIS and draft Resolution 2024-22 by selecting the No Build alternative and ordering consideration of more cost-effective alternatives aligned with Sound Transit's authority, such as those mentioned in the essay by Mr. Prestrud. Board members have the authority and the responsibility to spend taxpayers' dollars wisely. Please do the right thing for our Region.</p>	<p>Your support for the No Build Alternative has been noted.</p>
2	<p>Faced with this difficult situation, a financially prudent governing board would ask whether it makes sense to proceed with a project that has tripled in cost and busts the budget, but the Sound Transit Board has taken a different approach. In board motion M2024-59 Sound Transit directs staff to "...develop a workplan on the programmatic, financial, and project level measures and opportunities the agency will pursue to improve the agency's financial situation and move WSLE through design to inform a financially sound project to be baselined...". What the motion does not do is develop alternatives or ask whether the project still makes sense. And, in case you were wondering, "baselined" is a sort of euphemism for moving the goal posts.</p>	<p>The Sound Transit Board considers a number of factors in selecting the project to be built. Those factors include potential environmental impacts; equity; Tribe, agency, business, community organization, and public comments; cost; schedule; ridership; and potential long-term benefits.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
3	<p>The Board's motion shows that Sound Transit is approaching the problem as though it is just about the agency budget, but that narrow view ignores the bigger question raised by the FEIS, which is that despite the extravagant cost the project accomplishes very little. The fine print of the FEIS reveals total transit ridership in the region under the No-Build alternative would produce 99.7% of the ridership of the light rail alternative. In other words, the light rail extension would produce less than a one percent increase in total transit ridership for an investment of over \$6 billion. That is an exceedingly poor return on such a massive investment. You might be hoping that even if the project doesn't do much to increase ridership it might reduce congestion or greenhouse gas emissions. Alas, the FEIS also informs us that vehicle hours of delay would change by less than one half of one percent, and total vehicle miles travelled changes even less, just two tenths of one percent. As result, the West Seattle extension will not reduce greenhouse gas emissions, improve transportation system efficiency, or meaningfully improve the mobility of West Seattle residents.</p> <p>Why does spending billions of dollars on a light rail line accomplish so little? Part of the reason is that King County Metro already provides RapidRide express bus service along the same route. The incremental improvement in service that light rail might provide is very small, in fact so small that it attracts very few new riders. The existing RapidRide service also has the advantage that it starts farther south and continues through downtown to the South Lake Union area. In contrast, the light rail line would serve only three stops in West Seattle, require transfers to reach other destinations, and be useless for most trips that West Seattle residents make.</p>	<p>See response to comment 2 regarding Sound Transit Board decisions on the West Seattle Link Extension.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
4	<p>The success of the RapidRide routes suggests a solution to Sound Transit's problem. It wouldn't be difficult to further enhance RapidRide service so it served more destinations and ran more frequently. The RapidRide C line already benefits from bus-only lanes on the West Seattle Bridge, HWY 99, and Westlake Ave. Additional transit priority improvements could be made to increase speed and reliability.</p>	<p>The project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p> <p>A list of bus route service changes for each of the Build Alternatives is provided in Section 3.3.2, Build Alternatives, of Appendix N1, Transportation Technical Report, of this West Seattle Link Extension Final Environmental Impact Statement (EIS). Bus service assumptions for both the No Build Alternative and Build Alternatives were developed by King County Metro Transit (Metro) and Sound Transit as part of the project's Transit Service Integration Technical Memorandum, provided as Appendix B to Attachment N.1A, Transportation Technical Analysis Methodology, of Appendix N.1. Bus service would be restructured to integrate with the project, which would result in removing or truncating some lines but generally replacing them with reliable, high frequency light rail service. The 2042 Build Alternatives assume there will be changes to bus service in the West Seattle Link Extension project corridor to integrate with the new light rail line. The service changes are based on Metro Connects and coordination with Metro regarding this project.</p>
5	<p>Transit planning should also recognize that many West Seattle residents travel to Renton, South Center, Auburn and Kent. None of those places are served by light rail but all could easily be served by expanded bus service.</p>	<p>See response to comment 4 regarding the corridor selection for the West Seattle Link Extension. The West Seattle Link Extension would allow for future extension south, and the Sound Transit 3 Plan includes study of future high-capacity transit connecting West Seattle to Burien.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
6	<p>If the Sound Transit Board insists on viewing the situation as just a budget problem, they are likely to discover there is no good solution. If, however, they broaden their thinking to consider alternatives to light rail they will discover there are vastly superior ways of improving mobility. Rather than directing staff to find new revenue the Board should request an analysis of lower cost and lower risk alternatives. That should include a benefit/cost analysis that provides an objective basis for comparison of the possible alternatives.</p> <p>In 1996, 2008, and 2016 Sound Transit sold voters on the idea that building a light rail system was the solution to the region's growing transportation needs. Now the FEIS for West Seattle extension project shows that the agency's rigid adherence to light rail has become the obstacle to consideration of far more cost-effective alternatives.</p>	<p>As described in Chapter 2, Alternatives Considered, of the Final EIS, third-party funding or found cost savings will likely be needed for the West Seattle Link Extension alternatives. For example, based on current cost estimates and revenue projections, the Preferred Alternatives for the West Seattle Link Extension is anticipated to exceed the cost assumptions contained in Sound Transit's re-aligned financial plan.</p> <p>Sound Transit, City of Seattle, and King County acknowledge there may be shared responsibility to address the additional cost difference between the final project to be built and the re-aligned financial plan through either additional funding or cost-savings opportunities. As described in Motion 2023-18, the City of Seattle and King County provided letters to Sound Transit on March 23, 2023, indicating their intent to work with Sound Transit to further analyze costs and funding sources over the next year and develop a funding agreement in advance of the Board action to select a project to be built.</p> <p>Chapter 2 also explains that when the Sound Transit Board identified alternatives for study in the West Seattle and Ballard Link Extensions (WSBLE) Draft EIS, early cost estimates indicated that alternatives with a tunnel in West Seattle could have required additional funding; that is, funding beyond what was assumed in the Sound Transit 3 financing plan. Additional funding for these alternatives would have needed to come from contributions from partner agencies outside of Sound Transit, such as the City of Seattle or others. The alternatives that were anticipated to require "third-party" funding were identified with an asterisk (*) throughout the WSBLE Draft EIS.</p> <p>Following publication of the WSBLE Draft EIS, more specific cost estimates were reviewed by Sound Transit. Because of the rising price of real estate, some tunnel alternatives would not necessarily cost more than elevated alternatives. As a result of these developments, the asterisk indicating third-party funding has been removed from alternative names in the Final EIS. Please see Section 2.9, Project Funding and Cost Comparison, of this Final EIS for updated capital costs.</p>

SOUND TRANSIT'S LINK LIGHT RAIL EXPANSION TO WEST SEATTLE - **WHY BUILD IT?**

Our transit experience will get worse: Buses deliver as many passengers *today* between downtown and West Seattle on a *one-seat, no transfer ride* as light rail will in 20 years - with 2-3 transfers! This **7** *4-billion/four mile light rail project will take us only to SODO by 2032.* This investment of time and tax dollars should result in something *better* than we already have. **WEST SEATTLE DESERVES A BETTER SOLUTION!**

We Support Mass Transit **and light rail is wrong for West Seattle:**

Seventy (70) West Seattle businesses will be destroyed and relocated to accommodate the tracks, but *where?*

500 West Seattle jobs will be lost when these businesses close.

Families and neighbors will lose: Daycare at Alki Beach Academy, music lessons and camps at Mode Music and School of Rock, and swimming lessons at West Seattle Health Club.

Neighborhood food sources will disappear to make room for the stations:
Delridge - Deli Mart, Ounces, Uptown Espresso, Subway. **Avalon** - Pecos Pit, Starbucks, Taco Time, West Seattle Brewing Co, Jones BBQ, 7-11. **Alaska Junction** - Safeway, Nikko Teriyaki, Bartell.

The environment will lose: The light rail line will plough through the **West Duwamish Greenbelt**, destroying **Pigeon Point** trees that house 24 Great Blue Heron nests. It will also irreparably damage **Longfellow Creek** beaver and salmon habitats. Construction of this light rail project will generate more carbon emissions than 10,000 regular cars generate in a decade!

We can give our community better transit *without* destroying it!

Join our email list: contact@rethinkthelink.org

West Seattle Light Rail Environmental Impact Statement-Conclusion (EIS-C)

An independent assessment of the environmental impact
of the Sound Transit West Seattle-Link Extension (WSLE) light rail proposal

Submitted by Rethink The Link (RTTL) and Regional Transit Colleagues

Revision 4.6 October 13, 2024

Comments or Questions? Contact RTTL at email contact@rethinkthelink.org

Section 1: Executive Summary

The Ballard-West Seattle light rail discussion started from the premise that roadway-based modes could not handle peak period passenger demand in that corridor. Thus, in 2016, Sound Transit presented a Ballard-West Seattle link extension (WSBLE) light rail proposal in its ST3 transportation package. It offered simple criteria for voters to consider:

- improve public transit,
- encourage economic development, equity, community-building and social justice,
- protect the environment.

Sound Transit's January 2022 WSBLE Draft Environmental Impact Statement (DEIS) was designed to show that:

- these simple criteria would be satisfied, and
- WSBLE's proposed advantages would outweigh its disadvantages.

The DEIS combined both West Seattle and Ballard light rail segments into one project routed through downtown Seattle. But changes to the Ballard portion required additional work. So Sound Transit and the USDOT Federal Transit Administration decided to separate them into two projects, move forward with a separate environmental review for the West Seattle (WSLE) portion, and delay review for the Ballard portion.

Since then, independent transit experts have researched and analyzed information from the West Seattle sections of the WSBLE DEIS, public comments submitted about the DEIS, the Final EIS released September 20th, and additional public transit research findings. **Since the 2016 ST3 vote, Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE.** With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension (WSLE) does not satisfy the ST3 and DEIS criteria, and should not be built. The experts found that:

- WSLE transit times and therefore ridership will degrade, not improve West Seattle transit service after the WSLE and Ballard LE open in 2032 and 2042 respectively
- The construction generation of carbon will be more than carbon-reducing impacts of WSLE trains can mitigate over five future decades of WSLE operation.
- Acres of forest and habitat will be eliminated, and much more of it irreparably damaged
- Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network:

- Economic development in West Seattle and Chinatown-International District will be set back for at least a decade
- Equity, community-building and social justice will be set back at least a decade,
- And raising the question, based upon the newest, September 2024 WSLE cost estimate: “How can six to seven billion dollars be better spent to improve public transit?”

The Sound Transit Board can and should choose the No Build option for the WSLE.

- Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016, allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.
- ST Executive Corridor Director Cahill Ridge’s told the November 2017 West Seattle Transportation Coalition public meeting that ST “has no Plan B” for WSLE if financial, disruptive technology or other factors arise. He was incorrect. ST has several Plan B options available.
- Lower carbon, less expensive and less destructive public transit options than WSLE have been studied by Sound Transit, are available and serving West Seattle riders better now than rail will in the future, including but not limited to:
 - a. Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane
 - b. Add north and south Busway exits from east end of West Seattle Bridge
 - c. Add to exclusive bus lanes in West Seattle
 - d. Complete Metro Transit initiative to electrify bus fleet
- No Build is a legitimate, legal, and responsible choice, included under federal and state law in all environmental reviews of large, disruptive transit construction projects. ST3 project sponsors can and should consider this option and should note that the facts overall point to selection of No Build.

This document addresses the West Seattle link extension specifically, and the WSLE generally. It contributes summary information to the decision-making processes for:

- a. local and state government officials who regulate and influence Sound Transit decision making, and
- b. citizens who pay significant taxes (see “revenues vs. costs” below) to fund Sound Transit, in the expectation that their government will provide improved mobility services.
- c. Government decision makers who have to decide what the WSLE Record of Decision (ROD) will finally state as the result of the environmental process for WSLE.

Section 2: Current Transit Ridership and Forecasts for West Seattle-Downtown Corridor, and Region

1. **The WSLE light rail plan will not improve transit or rider experience on the Downtown-West Seattle corridor. It will make them worse.**
 - a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though heavy traffic may cause it to take longer.
 - b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see “transfer penalty” in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer.

- c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers.
2. **Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.**
- a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.
 - b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)
 - i. The FEIS sorts ridership forecasts based on several options:
 - (a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built
 - (b) Two station scenario, without Avalon station
 - (c) Three station scenario with Delridge, Avalon and Junction stations
 - ii. Appendix 2 of Sound Transit's Transportation Technical Report shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.
 - c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day.
 - d. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.
 - i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix, **Per Capita Transit Ridership Is Declining**).
3. **Sound Transit is not building what voters approved as ST3 in 2016:**
- a. Voters are getting a different rail plan than Sound Transit presented as ST3 in 2016:
 - i. The original Ballard-West Seattle line (WSBLE) is now two separate lines – BLE and WSLE
 - ii. **The \$1.7 billion ST3 budget for WSLE is now \$6-\$7 billion.** Listed Rapid Ride corridor improvements have not been made, and its 2030 delivery date will not be met.
 - iii. The ST3 proposal did not describe Pigeon Point deforestation, "irreparable" habitat damage, or any notice of a large carbon footprint from construction as documented in earlier Sound Transit projects.
 - iv. Additional carbon and pollution generated from 5-8 years of traffic congestion is not specified in the DEIS but may be tallied in SDOT's (Seattle Dept. of Transportation) annual carbon assessment.
 - b. Since 2016, ST has altered proposed routes, plans, and station configurations without filing any DEIS amendments, or providing public notices as changes are made.

- c. Though the Sound Transit Board of Directors has not approved a West Seattle route, Sound Transit is delivering notices of potential buyouts and teardowns to property owners along a “placeholder” route.
- 4. **Few people who voted for ST3 in 2016 understood the significant negative impacts of WSLE.**
 - a. Until 2015, Sound Transit’s ST3 plans only included a light rail connection to Ballard.
 - b. Changing course in 2016, Sound Transit included a short light rail line to West Seattle in ST3. It promised that if voters approved ST3, bus and rapid transit service would be improved, and detailed light rail planning and public outreach would follow.
 - c. Few voters understood the negative impacts WSLE would have on their transit experiences, on the environment, and in losses of homes, businesses and jobs.
- 5. **Puget Sound Regional Council (PSRC) and Sound Transit data show that by 2050, light rail will only carry 3% of all regional trips, and buses only about 5% -- despite PSRC expecting 1.8 million more residents living in the Snohomish-King-Pierce region.**
 - a. PSRC expects buses and trains together will carry just 15% of trips in Seattle.
 - b. A government rationale for supporting WSLE is that transferring passengers onto the four-mile rail line will free buses it can redeploy for more frequent local service.
 - i. Data and experience, including “transfer penalty” and truncated bus routes, do not appear to support this rationale.
 - ii. Metro Transit stated to the West Seattle Transportation Coalition in 2014 that it will cancel a bus route costing more than \$7 per rider (about \$10 in 2024 dollars). The September 2024 WSLE cost estimate of \$6-\$7 billion to serve 27,000 riders, puts its per rider expenditure on 2032 opening day at \$222,000-\$260,000 per rider (see Economics 3.2.a. below).
 - 1. Using ST estimates of 4 million WSLE riders per year and adding \$40 million per year cost for operations and maintenance, reduces per rider cost to \$1500 for the first year, eventually plateauing at \$600 per rider in perpetuity.
 - 2. If rail does not replace bus, and per-trip cost from point A to point B is not reduced, moving riders from bus to rail is not beneficial. If only the rider’s trip is measured, without including distance, the result may be misleading. For example:
 - a. Neither Metro Transit nor Sound Transit appear to have made cost-benefit calculations to assess the transit cost effectiveness of WSLE.
 - b. Metro’s plan for WSLE to replace four miles of bus corridor means it will deliver \$10 /rider passengers to one station of a \$1500 /rider rail line, then use another \$10 /rider bus to pick up the portion of those riders who don’t continue on rail.
 - c. Passengers who ride further on rail may also transfer to bus at the end of their rail segment.

- iii. Electrification of the Metro bus fleet, and expansion of flexibly routed bus service that would connect riders more efficiently to destinations within and beyond West Seattle, would yield a far better cost-benefit ratio. It could be funded with a fraction of the \$6-\$7 billion estimated for a single, four-station WSLE route.
 - iv. Improving bus service should also include City of Seattle exercising its municipal authority to eliminate road bottlenecks to give buses more priority in traffic.
- 6. **The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle corridor.**
 - a. ST's WSBLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service.
 - b. Presently, public and private roadway buses, vanpools and ride-share services can be programmed to carry more riders than light rail, often faster and less expensively. And their routes can be modified – unlike light rail -- as conditions change.
 - 1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers
 - 2. King County Metro:
 - a. is planning to transition its entire fleet of buses to electric power.
 - b. has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas.
- 7. **The light rail bridge – that has not yet been designed, would extend 1.5 miles from SODO to Pigeon Point at a minimum 100 feet height over the Spokane St. viaduct, SR99, and the Duwamish River. This presents risks of rising expenses and construction delays, including:**
 - a. No passenger railroad bridge of this length and consistent height has ever been built.
 - b. The bridge will run over the Seattle Fault earthquake and liquefaction zone, creating engineering challenges and downstream risks.
 - i. Structural shifting caused by the 2001 Nisqually earthquake contributed to the 2022 failure of the West Seattle high bridge, and its 2-1/2 year closure for repairs. The proposed WSLE bridge follows the same pathway, but at twice the elevation.

Section 3: Economics

- 1. **At \$6-\$7 billion (\$1.5 billion-\$1.75 billion per mile) for 4 miles (Seattle Transit Blog), WSLE is the world's second-most expensive urban rail project, behind NYC's subway upgrade (\$2.8 billion /mile), but a ahead of San Francisco's subway (\$920 million /mile)**
 - a. The cost covers only the light rail segment between SODO and West Seattle

- b. Additional cost will be incurred for building the SODO to downtown Seattle tunnel link.
- 2. **On opening day 2032, Sound Transit will have spent more than \$1 million per rider to put each passenger on the WSLE train** (including construction, interest payment, operations, and maintenance costs).
 - a. Opening day WSLE cost is based on Metro Transit continuing to run the C, H and 21X bus lines between West Seattle and downtown until the SODO-Downtown segment is complete in 2042. In an email to the Federal Transportation Administration, ST estimated 5,400 boardings per day between 2032 and 2042.
 - b. After 2042, when bus service ends on the corridor, Sound Transit estimates ridership will increase to 27,000 boardings per day. Adding an estimated \$2 billion cost for the SODO-Downtown, second tunnel segment, cost may drop to \$334,000 per rider.
 - i. Depending on Sound Transit's amortization schedule for the \$9 billion total WSLE + Downtown segment construction expenditure, plus interest payments, plus \$40 million estimated annual WSLE operations & maintenance cost, overlaying annual ridership estimates of 4 million, per rider cost may plateau between \$600-\$1500 in perpetuity.
 - c. In advocating for WSLE rail to replace buses on the 4-mile SODO-WS corridor, Metro Transit is advocating to deliver \$10 per rider passengers to a \$600 to \$1 million per rider WSLE train station, for a four-mile ride, where another \$10 per rider Metro bus will pick them up.
 - d. The non-profit Transportation Choices Coalition testified at Sound Transit's September 26, 2024, board meeting that price should be no object. Between Washington's powerful Congressional delegation able to funnel debt-relief capital to Sound Transit, and the perpetual \$1780 per year in Sound Transit taxes that every Pierce, King and Snohomish county household has been paying since 2017, TCC believes money will be perpetually available for light rail projects.
 - e. In 2022, Sound Transit reported a \$12 billion budget shortfall, then recast its accounting to appear \$6 billion in debt. At ST's September 19, 2024, board meeting, ST CEO Goran Sparrman and Deputy CEO of Megaproject Delivery Terri Mestas asserted that the \$6-\$7 billion cost for WSLE can be managed.
 - f. It would appear that, if cost is no object, Sound Transit could spend any amount required to tunnel from SODO to the east bank of the Duwamish, use an immersed tube or other tunnel to cross beneath the Duwamish, then tunnel from the west bank to the West Seattle Junction, reducing most impacts listed here.
 - i. This project would require Sound Transit to generate a separate EIS.
- 3. **WSLE may present revenue losses and opportunity costs for transit across the region (Snohomish, King, and Pierce counties), and for the key light rail city of Seattle.**
 - a. While city and county revenues have decreased, Sound Transit will eliminate businesses, services and properties that pay into municipal tax rolls.
 - i. Neither ST, Seattle nor King County has run cost-benefit analyses to judge whether trading a decade's worth of WSLE-caused tax revenue losses for anticipated future revenue will pencil out – given that:

1. Neither ST nor the City of Seattle has calculated what net economic benefits WSLE will create for West Seattle, the CID and SODO, and
 2. While light rail creates benefits in some areas, West Seattle commerce and real estate markets up to now have not significantly suffered, even during the pandemic.
- b. **At least 70 West Seattle businesses and services will be forced to move or close, but the final number can't be determined until ST chooses a WSLE alignment.**
- i. In West Seattle, 500-1000 jobs connected to displaced businesses and services will be lost. In SODO and Chinatown-International District areas, additional businesses will be displaced or close, and more jobs lost.
 - ii. The number of businesses displaced will depend on the WSLE alignment ST finally chooses. West Seattle blogger Marie McKinsey offered this list of possible business displacements, extending from Jefferson Square (37 closures) to Delridge (West Seattle Athletic Club, Uptown Espresso, Skylark Cafe), to West Marginal Way.
 - iii. Patronage estimates by affected businesses (e.g., 7-11, Taco Time, Starbucks) average 1000 customers per day, with more for larger enterprises (e.g., Trader Joe's, Safeway).
 - iv. Businesses forcibly relocated have low survival rates, particularly in minority and low-to-middle income neighborhoods: 1974 Urban Renewal study: (<https://www.kcdc.org/wp-content/uploads/2022/10/A-Case-Study-of-the-Consequences-of-Displacement-Caused-by-Urban.pdf>). "The non-survival rate was highest among the small eating and drinking, food stores, and miscellaneous retail and services."
 - v. Demographic trends show movement of upscale, primarily White workers moving back to urban centers of employment and commerce, and non-White workers and businesses moving or (immigrants) taking up residence in suburban areas (see Appendix 5. 'Great Inversion')
 1. As these trends continue, it is even less likely minority businesses will be able to successfully relocate, and even less likely the employees of these businesses will find places they can afford to live.
 2. While light rail helps move people to areas of the city where they can recreate and consume, it does not support people who are providing the businesses and jobs for the more metropolitan population.
- c. Rather than create an estimated \$6-\$7 billion in lost WSLE opportunity costs for Seattle and the region, the money could be better invested in other transit options within the WSLE corridor and beyond, yielding a lower carbon footprint, and fewer environmental, social and economic impacts.
4. **Freight, public transit, emergency services and commuters will be disrupted, and productivity impacted as West Seattle's main roads north and south of the WS high bridge are blocked during construction.**

Section 4: Local Environment and Global Climate

1. As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:

- **attracting new riders, and**
- **expanding walkable, car-free urbanism near three new West Seattle light rail stations.**
 - a. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e) forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6-3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total...").
 - 1. The restatement is used to extend the mitigation period by at least 50 years – to 2080, or later.
 - 2. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them.
 - 3. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period
 - 4. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit.
 - 5. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy
 - i. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032.
 - ii. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080.**
 - iii. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941 tons.
 - 1. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941 tons per year reduced, yields a payback period of 48 years – until the year 2080, to mitigate WSLE construction carbon.
 - b. **The Build option will only reduce car and light truck miles traveled by 0.02%** compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total – Table 4.6-1, "Regional Vehicle Miles Traveled and Average Daily Traffic Change"). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.
 - c. **Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes.** This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.
 - d. **The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit**

Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.")

- TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...")
 - The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2,941 tons generated by the methodology Sound Transit uses in the WSLE FEIS.
 - This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly.
 - While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile, 160 foot-tall, elevated light rail bridge has ever been built or fully calculated.
- e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.
- f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's and King County's goals are to achieve carbon neutrality by 2050.
- However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use.
 - As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day.
 - Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not.
- g. **The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated.** Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from [TreePAC.org](https://www.treepac.org/). Those trees would have absorbed an estimated 64,000 tons of carbon a year ([City of Seattle & One tree Planted](#)) – nearly half the carbon output from WSLE construction.

The City of Seattle can ill afford to lose tree canopy. Seattle has lost 255 acres of trees since 2017 (acreage cut by Sound Transit within city limits may be included in the Seattle count). Globally in 2023, forests and other land ecosystems emitted almost as much carbon dioxide as they absorbed, due to fires, deforestation, and other factors.

- a. Eliminating acres of forest will exacerbate Seattle's heat islands, which are worst around light rail stations, areas where the city's commerce and employment are concentrated, and within its low income and of-color communities, which Lower economic areas are more prone to heat adverse conditions, fewer parks and tree cover. They are less economically able to afford air conditioning or other means to keep cool.
 - Heat sink areas, King County Executive (& ST Chair) Dow Constantine's "Three Million Trees Initiative", City of Seattle's Trees for Neighborhoods program, KC Land Conservation Initiative: <https://kingcounty.gov/en/legacy/elected/executive/constantine/news/release/2021/june/23-heat-mapping-results> (June 23, 2021)
- b. The WSLE will eliminate three acres of north Pigeon Point Forest, plus 1-3 more acres of West Seattle green space, and beaver, salmon, heron and other species habitats there and on the Duwamish River and Longfellow Creek.
 - Sound Transit has not calculated costs for man-made elements to replace erosion control, storm water management, oxygen production, carbon sink, shade, and other ecosystem services provided by green infrastructure.
- c. As Sound Transit runs its modest program to replace trees it has eliminated, and Seattle's recent \$13 million in federal grants will fund planting trees in Delridge and the Chinatown International District, the two entities will simply be working back from the deficit ST will cause with WSLE.
- d. Replacing mature trees with saplings is what Nature does after a natural disaster. ST is imitating a natural disaster.

2. Under Washington's Climate Commitment Act (CCA), Sound Transit's claimed level of carbon emissions in the FEIS – 141,000 metric tons over five to six years of construction – qualify it as a "large quantity carbon emissions generator" (LQG). The LQG threshold is 25,000 metric tons of carbon per year.

- a. The best way to avoid emission is not to generate them (see **Minnesota** below).
- b. The WSBLE DEIS does not address purchases of carbon offsets, or other high-quantity mitigation plans for this massive output.
- c. The Puget Sound Clean Air Agency's (PSCAA) analysis finds ". the Chinatown International District and Duwamish Valley neighborhoods facing disproportionate air pollution impacts, impacts from WSBLE construction, and more sensitive health outcomes in the form of higher air quality-related hospitalizations."
- d. PSCAA AQ Director Kathy Strange commented in 2022 on Sound Transit's WSBLE DEIS, that "...transportation emissions will be improved in the long-term because of light rail..." The data prove otherwise.
- e. Currently, Minnesota is the only U.S. state holding its agencies accountable to its climate goals. A provision in its 2024 transportation law requires both state and municipal transportation planning agencies to take the state's climate goals into account when assessing new projects.

3. Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE.

Section 5: Equity

1. Sound Transit's WSLE proposal does not prioritize equity.

- a. The WSLE will serve the more affluent parts of West Seattle, while travel from less affluent, more diverse areas with more mobility disadvantaged citizens will require more transfers and take longer
- b. A "transfer penalty" will affect riders arriving at stations by bus at ground level. They must either ride or climb multiple levels up or down to reach a train. At the Junction station, walk time may add five minutes to the transfer, and the wait time for the next train may add another 10.
- c. Light rail will not improve access for residents who live in West Seattle's transit deserts (those lacking convenient access to transit within ¼ mile walk).
 - i. Metro buses re-deployed after the 2042 opening of WS-CID service will not deliver residents remaining in West Seattle to new locations of businesses and services WSLE will have displaced.
 - ii. WSLE will instead encourage more use of private vehicles to reach these locations.
- d. Elimination of the Frye Business Center and commercial properties to the north and south for construction of the Delridge and Avalon light rail stations will:
 - i. exacerbate the "food desert" of grocery and prepared food providers between North Delridge and California Ave SW, for the area's mixed demographic communities
 - ii. eliminate the walkable/15-minute Delridge-Avalon neighborhood, and deprive these communities of gathering places, and medical, social, business and recreational services

2. To make way for light rail, WSLE will eliminate over one hundred houses and apartments.

- a. The full number of residential buildings to be razed cannot be estimated, as Sound Transit has not chosen a final route. It will bulldoze everything from single houses in Delridge to 92 apartments in Jefferson Square. The Executive Summary of the WSLE FEIS indicates that the Preferred Alternative will require displacing 165 to 173 residential properties, and 132 to 133 businesses employing 1,230 people.
- b. Despite large numbers of new housing units and apartments built in West Seattle since 2014, rent and purchase costs have increased, not decreased. That has pushed out less wealthy residents (see *Seattle Times* May 12, 2024) and increased their needs to travel longer distances for work, shopping and entertainment, most often by car. Many have moved to other cities.
- c. Transit-oriented development (TOD -- dense housing, such as apartments, multiplexes, and ADUs) has been built along the Delridge, Avalon and East Junction bus routes of Rapid Ride H and C, and 21 and 128. Sound Transit will bulldoze a significant portion for the rail line, and not replace it for up to 10 years, further depriving West Seattle of affordable housing, while wasting public resources.

3. The Sound Transit Board has the authority to choose the No Build option for WSLE.

- a. Under Section 2 of the ST3 package that voters approved in 2016, the board must reconsider projects that are infeasible, unaffordable and/or unbuildable. WSLE is all three.
- b. Contrary to what regional and city leaders are saying, the WSBLE and WSLE light rail proposals can be re-considered, and better transit options can be chosen – under the No Build option
- c. No Build is a legitimate, legal, and responsible choice, which is included, under federal and state law, in all environmental reviews of large, disruptive transit construction projects. Based on the findings of the environmental process through this date, project sponsors should adopt the No Build option.
- d. The No Build option for WSLE will only affect the West Seattle corridor:
 - i. other ST3 projects could continue to be studied and implemented, as they are subject to a separate environmental process, and
 - ii. Sound Transit will still be able to get Federal Capital Investment Grants for non-light rail transit, and for expansion of high-capacity fixed-route bus transit.

Concluding Summary:

1. The Downtown-West Seattle (WSLE) light rail line should not be built (No Build option). Within the No Build option, the Ballard-Downtown segment should also be reconsidered.
2. Sound Transit's WSLE presents more disadvantages than advantages, including overwhelmingly negative social, economic and environmental impacts. As such, it fails to satisfy basic criteria set forth by ST3 and its FEIS for improving corridor transit. The costs, and negative environmental, economic and residential impacts of WSLE outweigh the benefits of building it
3. Current transit modes carry more passengers now, without transfers and wait times, than light rail promises to carry when completed. WSLE will degrade rather than improve the ridership experience.
4. The 146,000 tons of carbon that WSLE construction will generate – reduced from 614,000 tons in the Draft EIS -- plus elimination of and damage to acres of forest and habitat, will be more than the benefits of a short light rail line can mitigate through year 2105.
5. Choosing the light rail investment over more flexible, effective and cheaper transit modes presents opportunity costs for the City of Seattle, and the regional transit network.
6. Sound Transit can achieve better ridership by continuing to expand and electrify King County Metro and ST Regional Express bus services, on the West Seattle peninsula, W. Seattle-Downtown corridor, and beyond.

Any Sound Transit taxing district resident opposed to the construction of the West Seattle light rail extension has three paths of action:

1. Use emailtheboard@soundtransit.org to contact all board members. As 17 of its 18 members are elected officials, and accountable to voters, each can be contacted directly by their own constituents.
 - o The Seattle members include City Council Member Daniel Strauss, Mayor Bruce Harrell, Council Member Rob Saka **, ST Board Chair Dow Constantine **, and King County Council Member Girmay Zahilay. (** indicates lives in West Seattle). City

Council Member Rob Saka chairs the City Council's Transportation Committee. King County Council Member Teresa Mosqueda also lives in West Seattle.

- Include specific information from this document in messages to officials
- Contact board and council members by letter, phone and email, and urge (or demand) that they:
 - Stand up for businesses, jobs, housing, communities, and the environment in Seattle.
 - Call for adopting the **No Build Option** still listed in the FEIS for WSLE and visible for years in the DEIS for WSBLE.
 - Require Sound Transit to consider cheaper, less destructive, lower carbon transit options for the Downtown-West Seattle corridor than rail.
 - Support using other modes, including buses, bus rapid transit, and other transit service connections to the regional rail network
- 2. Contact Port of Seattle Commissioners Fred Felleman, Commissioner-Secretary Ryan Calkins, Commissioner-Vice President Toshiko Hasegawa, Commissioner-President Hamdi Mohamed, Regional Transportation Manager Geraldine Poor, Chief of Staff Aaron Pritchard, and management staff LeeAnne Schirato, Kathy Roeder and Sabrina Bolieu.
 - Ask them to object vigorously and officially to impacts the WSLE bridge will cause, and that the Port of Seattle has opposed, including obstruction of the East and West Duwamish waterways, impairment of maritime traffic and businesses, damage to the Duwamish River and Longfellow Creek ecosystems, and a huge carbon footprint.
- 3. Email local business organizations that will be affected:
 - * West Seattle Chamber of Commerce
 - * West Seattle Junction Association

Appendix

Additional Considerations from Research Literature

1. Consumer willingness to fund light rail development decreases as cost increases

Economists at the Federal Reserve Bank of St Louis showed that when consumers understand the actual costs of getting light-rail services, the amount is generally more than they are willing to pay.

Nationwide, annual light-rail operating costs (\$778.3 million) far exceed fare revenue (\$226.1 million). The balance (\$552.2 million) is paid for with tax dollars. Examples (see also Snohomish-King-Pierce below): Fare revenues cover only 28.2% of system operating costs for St. Louis, 19.4% for Baltimore and 21.4% for Buffalo. If construction costs are added, losses become so large, no light-rail system can possibly recoup its costs.

Based solely on dollar cost, economists at the Federal Reserve Bank of St. Louis suggest that annual light-rail subsidies in St. Louis could instead be used more efficiently to buy a hybrid Toyota Prius every five years and pay annual maintenance costs of \$6,000 for 7700 low-income transit riders – with minimal pollution increases, and only a 0.5 percent increase in traffic congestion. Funds would still be left for all other MetroLink riders to pay for ride-share and bus fares.

Houston: When Houston Metro proposed the Purple line in 2008, it estimated a \$591 million cost, and 28,750 weekday riders. By September 2020, costs reached \$822 million, with daily expected ridership decreased to 5,230, meaning a per rider cost of about \$150,000 to build the Purple Line.

Snohomish-King-Pierce Counties:

1. Sound Transit revenues do not cover its operating expenses
 - a. Sound Transit farebox revenues in 2023 covered only 16% of Link light rail operating costs (lower than the 40% minimum policy threshold), 9% of ST Express bus operating costs (below the 20% threshold), and 7% of Sounder costs (below the 23% threshold).
 - b. Revenue vs. cost gaps widen more when construction costs are added. Examples:
 - i. Adding together operations, maintenance and construction costs, light rail fare revenues cover less than 3%.
 - ii. For Sounder North commuter rail, ST over-estimated ridership by 90%, and underestimated total costs vs. farebox revenue by 95%.
 - c. As regional revenues will never cover or recoup its full costs, Sound Transit must add millions of dollars in federal grants and borrowed money to cover them.

2. Station development does not generally benefit low-income transit users

A 2019 University of Houston study finds mixed effects on the welfare of neighborhoods after light rail construction. Researchers estimated an \$11,000 average increase in median income for neighborhoods near the new rail line development; but most gains go to high-income neighborhoods, while low-income neighborhoods see their income decline. The observed income polarization may be explained by poverty magnet and gentrification effects occurring simultaneously across the treated neighborhoods.

Light Rail Transit (LRT) does not appear to consistently deliver on its progressive policy goals of alleviating labor-skill mismatch, creating time cost savings, and increasing income mobility.

3. Light rail development does not reduce congestion

Los Angeles: While light rail investments may increase transit accessibility and ridership within high-demand corridors, it does not reduce congestion.

4. Per Capita Transit Ridership Is Declining

Since 2013, U.S. transit ridership has declined, despite continued growth in population.

Ridership has peaked and decreased seven different times since 1980, but overall, transit ridership per capita has decreased by nearly 15%. Researchers are evaluating economic considerations, fuel price, changing modal choices, and other areas as possible causes for the decline.

Demographic trends help to explain declining transit usage:

a. The U.S. population is aging. While young age cohorts have a higher propensity for transit use, they represent a lower share of the population.

b. Simultaneously, significant population declines in some of the counties with high-quality transit service and use is being mirrored by population growth in counties with lower levels of transit service and use. Rapidly growing counties had half the rate of commuting to work by transit as did rapidly declining counties.

c. Over 90% of U.S. population growth in 2023 occurred outside of its 124 largest cities. Among the 124 cities that the U.S. Census Bureau reports with populations over 200,000, about a third have lost population except 14 over 200,000 populations cities in Texas, and nine in Florida. Medium-sized cities in Florida, the Carolinas, and Las Vegas suburbs also added to the population. Americans are presently trading dense, urban, transit-oriented cities for less expensive, more spacious living elsewhere. How this will play out in transit development and politics are key questions.

5. Great Inversion

Suburbia increasingly sorted on bases of socio-economic status and race (Nijman, 2020; Nijman & Clery, 2015). As suburbs continue growing:

- a. based on economic affordability (Kolko, 2017),
- b. central-cities appear to revive and renew growth, as city as “the office,” especially for growing numbers of self-employed and freelancers, in the new urban, knowledge transfer and networking economy, that thrives in a high density and high circulation environment (Carlino, 2015; Kloosterman, 2020; Scott, 2017).

Cities and city centers as preeminent sites of consumption, consumer services, and amenities: Glaeser, Kolko, and Saiz (2000). Also, rise of cities as sites of *consumption* (Jayne, 2005)

Significance of actual vs. relative numbers of workers, types of workers, incomes, and vulnerabilities of ‘gig economy’ and ‘sharing/platform economy’: (Graham, Hjorth, & Ledonvirta, 2017; Davidson & Infranca, 2016; Shambaugh, Nunn, & Bauer, 2018).

6. Public transit is losing its customer base

During the pandemic, people formed new mobility habits, and most are not returning to regular use of urban buses and trains. In a 2022 survey of 38 transit agencies worldwide, researchers found a 10% loss in the transit customer base, as reported by the International Association of Public Transit.

As of spring 2024, Sound Transit has not yet consistently reached its original 2010 light rail ridership target to the University District, even including the extension to Northgate, according to the U.S. Federal Transit Administration's National Transit Database (NTD). ST's original goal was an average of 2.7 million boardings per month. While it has touched that level in a few months since 2018, such as for Taylor Swift events in SODO, this ridership level has not been reached on average in 2024. Across all central Puget Sound transit agencies, NTD reports transit ridership as of April 2024 was 30% lower than in pre-pandemic 2019.

6. City of Seattle critique of ST3 DEIS (quote of excerpts):

- Sound Transit is considering cost savings refinements in response to its 2021 ST3 Realignment. Some of these proposed strategies are drastic.
 - We discourage scope reductions that do not bring commensurate benefit to the system and its riders, and that are not consistent with what was committed to voters.
 - We do not support strategies that would reduce access to the system.
- The City supports studying refinements that help control costs and provide meaningful benefits to local communities and the broader transit system and its riders, including:
 - Mix-and-match refinements for flexibility to choose segment alternatives that provide greatest benefit or fewest impacts;
 - Refinements to stations that would improve safe, non-motorized access;
 - Refinements that would avoid, minimize, or mitigate adverse project impacts.

7. Pandemic-caused vacancy rate increases in downtown areas

Between April 2019 and January 2023, Seattle had the second-highest downtown commercial vacancy rate in the U.S. (14.2%). "Seattle's office vacancy rate reached 23.2% in July 2024, according to a recent report by Commercial Edge Research, highlighting the city's struggle to adapt to post-pandemic market conditions,"

While Metro Transit ridership in 2024 has recovered to 75% of pre-COVID levels, full ridership recovery is questionable as work from home + hybrid structures continue, and central employment and commerce locations diversify from downtown Seattle.

8. Three factors drive excessive U.S. transit project costs

As Sound Transit cost overruns have been chronic, the New York experience provides a cautionary tale about how to structure transit projects, and how to avoid pitfalls.

Factors that add approximately 85% to costs include extra money going to red tape, wasted contingencies, paying workers during delays, defensive design, and profit. Specifically, the factors include:

- Lack of design standardization: this leads to fewer economies of scale, the inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process.
- Labor: 40-60% of the project's hard costs in the U.S. Labor costs in low-cost cases: Turkey, Italy, and Sweden are in the 19-30% range; Sweden, the highest-wage case among them, is 23%.
- U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher.

Appendix C. Comments Received on the Final EIS and Responses

Communication ID: 555630 – Rethink the Link

#	Comments	Responses
1	<p>SOUND TRANSIT'S LINK LIGHT RAIL EXPANSION TO WEST SEATTLE - WHY BUILD IT?</p> <p>Our transit experience will get worse: Buses deliver as many passengers today between downtown and West Seattle one-seat, no transfer ride as light rail will in 20 years - with 2-3 transfers! This 7-billion/ four mile light rail project will take us only to SODO by 2032. This investment of time and tax dollars should result in something better than we already have. WEST SEATTLE DESERVES A BETTER SOLUTION!</p> <p>We Support Mass Transit and light rail is wrong for West Seattle:</p> <p>Seventy (70) West Seattle businesses will be destroyed and relocated to accommodate the tracks, but where?</p> <p>500 West Seattle jobs will be lost when these businesses close.</p> <p>Families and neighbors will lose: Daycare at Alki Beach Academy. music lessons and camps at Mode Music and School of Rock, and swimming lessons at West Seattle Health Club.</p> <p>Neighborhood food sources will disappear to make room for the stations: Delridge - Deli Mart, Ounces, Uptown Espresso, Subway. Avalon - Pecos Pit, Starbucks, Taco Time, West Seattle Brewing Co, Jones BBQ, 7-11. Alaska Junction - Safeway, Nikko Teriyaki, Bartell.</p> <p>The environment will lose: The light rail line will plough through the West Duwamish Greenbelt, destroying Pigeon Point trees that house 24 Great Blue Heron nests. It will also irreparably damage Longfellow Creek beaver and salmon habitats. Construction of this light rail project will generate more carbon emissions than 10.000 regular cars generate in a decade!</p> <p>We can give our community better transit without destroying it!</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
2	<p>Since the 2016 ST3 vote, Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE. With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension (WSLE) does not satisfy the ST3 and DEIS criteria, and should not be built. The experts found that:</p> <ul style="list-style-type: none"> • WSLE transit times and therefore ridership will degrade, not improve West Seattle transit service after the WSLE and Ballard LE open in 2032 and 2042 respectively • The construction generation of carbon will be more than carbon-reducing impacts of WSLE trains can mitigate over five future decades of WSLE operation. • Acres of forest and habitat will be eliminated, and much more of it irreparably damaged • Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network: • Economic development in West Seattle and Chinatown-International District will be set back for at least a decade • Equity, community-building and social justice will be set back at least a decade, • And raising the question, based upon the newest, September 2024 WSLE cost estimate: "How can six to seven billion dollars be better spent to improve public transit?" 	<p>Your support for the No Build Alternative has been noted.</p>
3	<p>Lower carbon, less expensive and less destructive public transit options than WSLE have been studied by Sound Transit, are available and serving West Seattle riders better now than rail will in the future, including but not limited to:</p> <ol style="list-style-type: none"> a. Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane b. Add north and south Busway exits from east end of West Seattle Bridge c. Add to exclusive bus lanes in West Seattle d. Complete Metro Transit initiative to electrify bus fleet 	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>
4	<p>The WSLE light rail plan will not improve transit or rider experience on the Downtown- West Seattle corridor. It will make them worse.</p>	<p>Chapter 3, Transportation Environment and Consequences, provides ridership forecasts and travel times.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though heavy traffic may cause it to take longer.</p> <p>b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see "transfer penalty" in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer.</p> <p>c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers.</p> <p>Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.</p> <p>a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.</p> <p>b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)</p> <p>i. The FEIS sorts ridership forecasts based on several options:</p> <ul style="list-style-type: none"> a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built b) Two station scenario, without Avalon station c) Three station scenario with Delridge, Avalon and Junction stations <p>ii. Appendix 2 of Sound Transit's Transportation Technical Report shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.</p> <p>c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day.</p> <p>d. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower</p>	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>carbon footprint and fewer environmental, economic and residential impacts.</p> <p>i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix, Per Capita Transit Ridership Is Declining).</p>	
5	<p>The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle corridor.</p> <p>a. ST's WSBLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service.</p> <p>b. Presently, public and private roadway buses, vanpools and ride-share services can be programmed to carry more riders than light rail, often faster and less expensively. And their routes can be modified - unlike light rail -- as conditions change.</p> <p>1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers</p> <p>2. King County Metro:</p> <p>a) is planning to transition its entire fleet of buses to electric power.</p> <p>b) has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas.</p>	<p>See response to comment 3 regarding mode selection for the West Seattle Link Extension. A list of bus route service changes for each of the Build Alternatives is provided in Section 3.3.2, Build Alternatives, of Appendix N.1 of this West Seattle Link Extension Final EIS. Bus service assumptions for both the No Build Alternative and Build Alternatives were developed by Metro and Sound Transit as part of the project's Transit Service Integration Technical Memorandum, provided as Appendix B to Attachment N.1A of Appendix N.1. Bus service would be restructured to integrate with the project, which would result in removing or truncating some lines but generally replacing them with reliable, high frequency light rail service. The bus service hours savings from removing or truncating routes would be redeployed elsewhere in accordance with Metro's service guidelines. The 2042 Build Alternatives assume there will be changes to bus service in the West Seattle Link Extension project corridor to integrate with the new light rail line. The service changes are based on Metro Connects and coordination with Metro regarding this project.</p>
6	<p>As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:</p> <ul style="list-style-type: none"> • attracting new riders, and • expanding walkable, car-free urbanism near three new West Seattle light rail stations. <p>a. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e)</p>	<p>Please refer to Section 4.6, Air Quality, and Section 4.10, Energy Impacts, of the West Seattle Link Extension Final EIS for updated air quality and energy analyses. As described in Section 4.6.6.1.2, Construction Emissions, construction emissions were calculated using Federal Transit Administration's (FTA's) Transit Greenhouse Gas Estimator V3.0. The guidance for this is listed in the references and is available online at: https://www.transit.dot.gov/sites/fta.dot.gov/files/2022-04/FTA-GHG-Emissions-Estimator-v3-User-</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6- 3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total...").</p> <ol style="list-style-type: none"> 1. The restatement is used to extend the mitigation period by at least 50 years-to 2080, or later. 2. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them. 3. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period 4. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit. 5. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy <ol style="list-style-type: none"> i. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032. ii. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080. ** iii. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941tons. 1. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941tons per year reduced, yields a payback period of 48 years - until the year 2080, to mitigate WSLE construction carbon. b. The Build option will only reduce car and light truck miles traveled by 0.02% compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total -Table 4.6-1, 	<p>Guide.pdf. Printouts of the results from this estimator are available in Appendix L4.6E, Greenhouse Gas Analysis. Section 4.6.6.1.2 also discusses the emerging nature of this field of analysis and provides additional context for interpreting these results.</p> <p>Refer to Appendix L4.6E of the Final EIS for more information on the greenhouse gas emissions modeling.</p> <p>For more information on Sound Transit's environmental policy and sustainability initiatives, please visit Sound Transit's website at https://www.soundtransit.org/get-to-knowus/environment-sustainability.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>"Regional Vehicle Miles Traveled and Average Daily Traffic Change"). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.</p> <p>c. Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes. This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry-academic organization at the University of Washington.</p> <p>d. The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.")</p> <ul style="list-style-type: none"> • TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...") • The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2,941 tons generated by the methodology Sound Transit uses in the WSLE FEIS. • This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly. • While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated. <p>e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per</p>	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.</p> <p>f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's and King County's goals are to achieve carbon neutrality by 2050.</p> <ul style="list-style-type: none"> • However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use. • As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day. • Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not. <p>g. The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated. Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from TreePAC.org. Those trees would have absorbed an estimated 64,000 tons of carbon a year (City of Seattle & One tree Planted)- nearly half the carbon output from WSBLE construction.</p>	

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Subject	Do NOT move WSLE to “design” phase: Comment to ST board 10/24/2024
From	MartinWesterman
To	Email The Board
Cc	Zahilay, Girmay; Teresa Mosqueda; Rob Saka; Strauss, Dan; Harrell, Bruce; Rudolph, Catherine; Dave.Somers@co.snohomish.wa.us; Franklin, Cassie
Sent	Thursday, October 24, 2024 1:31 PM
Attachments	<<Final RethinkTheLink, Environmental Conclusion, Oct 13, 2024, Version 4.8.pdf>>

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the “fish” button in Outlook. Thank you! ST Information Security

Greetings esteemed leaders,

We ask the board to vote NO on moving WSLE to “design phase.”

Every time you use “the voters have spoken” as your rationale for proceeding with WSLE, you know that your voters did NOT approve this in the 2016 ST3 package. They approved a WSBLE package that would improve transit, and study light rail. Sound Transit has not used ST3 money yet to improve transit in the three-county region. Sound Transit HAS generated a light rail study, that found WSLE will not improve transit ridership, reduce congestion, or contribute to social justice and economic development. It will irreparably damage the environment, exacerbate heat islands, create food deserts and not improve transit deserts between SODO and the West Seattle Junction.

The board has been acting as if costs are irrelevant to this project. In fact, Motion 2024-59 directs ST’s CEO to shift WSLE baseline costs to make the project, which is \$5 billion over what voters approved in 2016, appear more affordable over a longer term than voters approved. We urge you to vote NO on this motion. You have all received our FEIS document, assembled by regional transit experts, and attached again here.

Appendix 8 is a consulting document that found three factors driving excessive U.S. transit project costs. It provides warnings for ST, and guidance on how to avoid pitfalls that add approximately 85% to transportation costs:

- Lack of design standardization — leading to fewer economies of scale, inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process.
- Labor costs: about 40-60% of US projects' hard costs, vs. labor costs in other countries studied (Turkey, Italy, and Sweden), that ranged from 19%-30% with Sweden as highest-wage case at 23%.
- U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher; and extra money for red tape, wasted contingencies, paying workers during delays, defensive design, and profit.

Are WSLE economics irrelevant to this board? Are you believing what Transportation Choices Coalition has told you — that money grows on trees? The term “affordable schedule” should be meaningful in the WSLE EIS process: you should be understanding that taxpayer funds and patience are limited, especially as WSLE is now 3 times more expensive than voters approved in 2016, and per costs have climbed to \$1.3 million /rider. I urge you to stop using my 2016 approval vote on ST3, for \$1.75 billion, as your excuse for proceeding with WSLE alone for \$7 billion. For that cost, you could electrify the entire Metro Transit fleet in King County, and improve transit across three counties. You remind me of an old joke about two women eating in a restaurant. One says, “This food is terrible,” and the other says, “And such tiny portions!” For a terrible WSLE proposal, we get so little public transit.

All the best on your reaching better transit decisions than you have been making so far,
Martin Westerman, West Seattle / 206-427-9039

Regional Transit Partners
Attachment: FEIS-C

West Seattle Light Rail Environmental Impact Statement-Conclusion (EIS-C)

An independent assessment of the environmental impact
of the Sound Transit West Seattle-Link Extension (WSLE) light rail proposal

Submitted by Rethink The Link (RTTL) and Regional Transit Colleagues

Revision 4.8 October 19, 2024

Comments or Questions? Contact RTTL at email contact@rethinkthelink.org

Section 1: Executive Summary

The Ballard-West Seattle light rail discussion started from the premise that roadway-based modes could not handle peak period passenger demand in that corridor. Thus, in 2016, Sound Transit presented a Ballard-West Seattle link extension (WSBLE) light rail proposal in its ST3 transportation package. It offered simple criteria for voters to consider:

- improve public transit,
- encourage economic development, equity, community-building and social justice,
- protect the environment.

Sound Transit's January 2022 WSBLE Draft Environmental Impact Statement (DEIS) was designed to show that:

- these simple criteria would be satisfied, and
- WSBLE's proposed advantages would outweigh its disadvantages.

The DEIS combined both West Seattle and Ballard light rail segments into one project routed through downtown Seattle. But changes to the Ballard portion required additional work. So Sound Transit and the USDOT Federal Transit Administration decided to separate them into two projects, move forward with a separate environmental review for the West Seattle (WSLE) portion, and delay review for the Ballard portion.

Since then, independent transit experts have researched and analyzed information from the West Seattle sections of the WSBLE DEIS, public comments submitted about the DEIS, the Final EIS released September 20th, and additional public transit research findings. **Since the 2016 ST3 vote, Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE.** With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension (WSLE) does not satisfy the ST3 and DEIS criteria, and should not be built. The experts found that:

- WSLE transit times and therefore ridership will degrade, not improve West Seattle transit service after the WSLE and Ballard LE open in 2032 and 2042 respectively
- The construction generation of carbon will be more than carbon-reducing impacts of WSLE trains can mitigate over five future decades of WSLE operation.
- Acres of forest and habitat will be eliminated, and much more of it irreparably damaged
- Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network:

- Economic development in West Seattle and Chinatown-International District will be set back for at least a decade
- Equity, community-building and social justice will be set back at least a decade,
- And raising the question, based upon the newest, September 2024 WSLE cost estimate: “How can six to seven billion dollars be better spent to improve public transit?”

The Sound Transit Board can and should choose the No Build option for the WSLE.

- [Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016](#), allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.
- ST Executive Corridor Director Cahill Ridge’s told the November 2017 West Seattle Transportation Coalition public meeting that ST “has no Plan B” for WSLE if financial, disruptive technology or other factors arise. He was incorrect. ST has several Plan B options available.
- Lower carbon, less expensive and less destructive public transit options than WSLE have been studied by Sound Transit, are available and serving West Seattle riders better now than rail will in the future, including but not limited to:
 - a. Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane
 - b. Add north and south Busway exits from east end of West Seattle Bridge
 - c. Add to exclusive bus lanes in West Seattle
 - d. Complete Metro Transit initiative to electrify bus fleet
- No Build is a legitimate, legal, and responsible choice, included under federal and state law in all environmental reviews of large, disruptive transit construction projects. ST3 project sponsors can and should consider this option and should note that the facts overall point to selection of No Build.

This document addresses the West Seattle link extension specifically, and the WSBLE generally. It contributes summary information to the decision-making processes for:

- a. local and state government officials who regulate and influence Sound Transit decision making, and
- b. citizens who pay significant taxes (see “revenues vs. costs” below) to fund Sound Transit, in the expectation that their government will provide improved mobility services.
- c. Government decision makers who have to decide what the WSLE Record of Decision (ROD) will finally state as the result of the environmental process for WSLE.

Section 2: Current Transit Ridership and Forecasts for West Seattle-Downtown Corridor, and Region

1. **The WSLE light rail plan will not improve transit or rider experience on the Downtown-West Seattle corridor. It will make them worse.**
 - a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though heavy traffic may cause it to take longer.
 - b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see “transfer penalty” in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer.

- c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers.
2. **Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.**
- a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.
 - b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)
 - i. The FEIS sorts ridership forecasts based on several options:
 - (a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built
 - (b) Two station scenario, without Avalon station
 - (c) Three station scenario with Delridge, Avalon and Junction stations
 - ii. Appendix 2 of [Sound Transit's Transportation Technical Report](#) shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.
 - c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day.
 - d. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.
 - i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix, **Per Capita Transit Ridership Is Declining**).
3. **[Sound Transit is not building what voters approved](#) as ST3 in 2016:**
- a. Voters are getting a different rail plan than Sound Transit presented as ST3 in 2016:
 - i. The original Ballard-West Seattle line (WSBLE) is now two separate lines – BLE and WSLE
 - ii. **The \$1.7 billion ST3 budget for WSLE is now \$6-\$7 billion.** Listed Rapid Ride corridor improvements have not been made, and its 2030 delivery date will not be met.
 - iii. The ST3 proposal did not describe Pigeon Point deforestation, "irreparable" habitat damage, or any notice of a large carbon footprint from construction as documented in earlier Sound Transit projects.
 - iv. Additional carbon and pollution generated from 5-8 years of traffic congestion is not specified in the DEIS but may be tallied in SDOT's (Seattle Dept. of Transportation) annual carbon assessment.
 - b. Since 2016, ST has altered proposed routes, plans, and station configurations without filing any DEIS amendments, or providing public notices as changes are made.

- c. Though the Sound Transit Board of Directors has not approved a West Seattle route, Sound Transit is delivering notices of potential buyouts and teardowns to property owners along a “placeholder” route.
- 4. **Few people who voted for ST3 in 2016 understood the significant negative impacts of WSLE.**
 - a. Until 2015, Sound Transit’s ST3 plans only included a light rail connection to Ballard.
 - b. Changing course in 2016, Sound Transit included a short light rail line to West Seattle in ST3. It promised that if voters approved ST3, bus and rapid transit service would be improved, and detailed light rail planning and public outreach would follow.
 - c. Few voters understood the negative impacts WSLE would have on their transit experiences, on the environment, and in losses of homes, businesses and jobs.
- 5. **Puget Sound Regional Council (PSRC) and Sound Transit data show that by 2050, light rail will only carry 3% of all regional trips, and buses only about 5% -- despite PSRC expecting 1.8 million more residents living in the Snohomish-King-Pierce region.**
 - a. PSRC expects buses and trains together will carry just 15% of trips in Seattle.
 - b. A government rationale for supporting WSLE is that transferring passengers onto the four-mile rail line will free buses it can redeploy for more frequent local service.
 - i. Data and experience, including “transfer penalty” and truncated bus routes, do not appear to support this rationale.
 - ii. Metro Transit stated to the West Seattle Transportation Coalition in 2014 that it will cancel a bus route costing more than \$7 per rider (about \$10 in 2024 dollars). The September 2024 WSLE cost estimate of \$6-\$7 billion to serve 27,000 riders, puts its per rider expenditure on 2032 opening day at \$222,000-\$260,000 per rider (see Economics 3.2.a. below).
 - 1. Using ST estimates of 4 million WSLE riders per year and adding \$40 million per year cost for operations and maintenance, reduces per rider cost to \$1500 for the first year, eventually plateauing at \$600 per rider in perpetuity.
 - 2. If rail does not replace bus, and per-trip cost from point A to point B is not reduced, moving riders from bus to rail is not beneficial. If only the rider's trip is measured, without including distance, the result may be misleading. For example:
 - a. Neither Metro Transit nor Sound Transit appear to have made cost-benefit calculations to assess the transit cost effectiveness of WSLE.
 - b. Metro’s plan for WSLE to replace four miles of bus corridor means it will deliver \$10 /rider passengers to one station of a \$1500 /rider rail line, then use another \$10 /rider bus to pick up the portion of those riders who don’t continue on rail.
 - c. Passengers who ride further on rail may also transfer to bus at the end of their rail segment.

- iii. Electrification of the Metro bus fleet, and expansion of flexibly routed bus service that would connect riders more efficiently to destinations within and beyond West Seattle, would yield a far better cost-benefit ratio. It could be funded with a fraction of the \$6-\$7 billion estimated for a single, four-station WSLE route.
 - iv. Improving bus service should also include City of Seattle exercising its municipal authority to eliminate road bottlenecks to give buses more priority in traffic.
- 6. **The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle corridor.**
 - a. ST's WSBLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service.
 - b. Presently, public and private roadway buses, vanpools and ride-share services can be programmed to carry more riders than light rail, often faster and less expensively. And their routes can be modified – unlike light rail -- as conditions change.
 - 1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers
 - 2. King County Metro:
 - a. is planning to transition its entire fleet of buses to electric power.
 - b. has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas.
- 7. **The light rail bridge – that has not yet been designed, would extend 1.5 miles from SODO to Pigeon Point at a minimum 100 feet height over the Spokane St. viaduct, SR99, and the Duwamish River. This presents risks of rising expenses and construction delays, including:**
 - a. No passenger railroad bridge of this length and consistent height has ever been built.
 - b. The bridge will run over the [Seattle Fault earthquake and liquefaction zone](#), creating engineering challenges and downstream risks.
 - i. Structural shifting caused by the 2001 Nisqually earthquake contributed to the 2022 failure of the West Seattle high bridge, and its 2-1/2 year closure for repairs. The proposed WSLE bridge follows the same pathway, but at twice the elevation.

Section 3: Economics

- 1. **At the present \$6-\$7 billion estimate for WSLE, Sound Transit will have spent \$1.1-\$1.3 million per rider to put each passenger on the train** (including construction, interest payment, operations, and maintenance costs).

- a. Opening day per rider WSLE cost is based on ST's May 12, 2023, email to the Federal Transportation Administration, estimating 5,400 boardings per day between 2032 and 2042 – as Metro Transit continues to run its C, H and 21X bus lines between West Seattle and downtown until the SODO-Downtown segment is complete in 2042.
 - i. After Year 1, expecting approximately 194,000 riders per year, per rider cost may drop to \$3107-\$3621 per rider, and by 2042, drop to \$381-\$330 per rider.
 - b. By 2042, it is estimated that Sound Transit will have spent an additional \$2 billion for the SODO-Downtown segment, including a second tunnel. Metro Transit will terminate Rapid Ride C, H and 21X bus service on the corridor. From that point, Sound Transit estimates WSLE ridership will increase to 27,000 boardings per day. Cost on opening day may thereby drop to \$296,000-\$334,000 per rider, calculating a \$8-\$9 billion total for the complete extension.
 - i. Depending on Sound Transit's amortization schedule for the \$8-\$9 billion total WSLE + Downtown segment construction expenditure, plus interest payments, plus \$40 million estimated annual WSLE operations & maintenance cost, overlaying annual ridership estimates of 4 million, per rider cost may plateau between \$600-\$1500 in perpetuity.
 - c. In advocating for WSLE rail to replace buses on the 4-mile SODO-WS corridor, Metro Transit is advocating to deliver \$10 per rider passengers to a \$600 to \$1.3 million per rider WSLE train station, for a four-mile ride, to a stop where they may transfer to another \$10 per rider Metro bus.
 - d. The non-profit Transportation Choices Coalition testified at Sound Transit's September 26, 2024, board meeting that price should be no object. Between Washington's powerful Congressional delegation able to funnel debt-relief capital to Sound Transit, and the perpetual \$1780 per year in Sound Transit taxes that every Pierce, King and Snohomish County household has been paying since 2017, TCC believes money will be perpetually available for light rail projects.
 - e. In 2022, Sound Transit reported a \$12 billion budget shortfall, then recast its accounting to appear \$6 billion in debt. At ST's September 19, 2024, board meeting, ST CEO Goran Sparrman and Deputy CEO of Megaproject Delivery Terri Mestas asserted that the \$6-\$7 billion cost for WSLE can be managed.
 - f. It would appear that, if cost is no object, Sound Transit could spend any amount needed for WSLE, and tunnel from SODO to the east bank of the Duwamish, use an immersed tube or other tunnel to cross beneath the Duwamish, then tunnel from the west bank to the West Seattle Junction, reducing most impacts listed here.
 - i. This project would require Sound Transit to generate a separate EIS.
2. **At \$6-\$7 billion (\$1.5 billion-\$1.75 billion per mile) for 4 miles (Seattle Transit Blog), WSLE is the world's second-most expensive urban rail project**, behind NYC's subway upgrade (\$2.8 billion /mile), but ahead of San Francisco's subway (\$920 million /mile)
- a. The cost covers only the light rail segment between SODO and West Seattle
 - b. Additional cost will be incurred for building the SODO to downtown Seattle tunnel link.

- 3. WSLE may present revenue losses and opportunity costs for transit across the region (Snohomish, King, and Pierce counties), and for the key light rail city of Seattle.**
- a. While city and county revenues have decreased, Sound Transit will eliminate businesses, services and properties that pay into municipal tax rolls.
 - i. Neither ST, Seattle nor King County has run cost-benefit analyses to judge whether trading a decade's worth of WSLE-caused tax revenue losses for anticipated future revenue will pencil out – given that:
 - 1. Neither ST nor the City of Seattle has calculated what net economic benefits WSLE will create for West Seattle, the CID and SODO, and
 - 2. While light rail creates benefits in some areas, West Seattle commerce and real estate markets up to now have not significantly suffered, even during the pandemic.
 - b. **At least 70 West Seattle businesses and services will be forced to move or close, but the final number can't be determined until ST chooses a WSLE alignment.**
 - i. In West Seattle, 500-1000 jobs connected to displaced businesses and services will be lost. In SODO and Chinatown-International District areas, additional businesses will be displaced or close, and more jobs lost.
 - ii. The number of businesses displaced will depend on the WSLE alignment ST finally chooses. [West Seattle blogger Marie McKinsey](#) offered this list of possible business displacements, extending from Jefferson Square (37 closures) to Delridge (West Seattle Athletic Club, Uptown Espresso, Skylark Cafe), to West Marginal Way.
 - iii. Patronage estimates by affected businesses (e.g., 7-11, Taco Time, Starbucks) average 1000 customers per day, with more for larger enterprises (e.g., Trader Joe's, Safeway).
 - iv. Businesses forcibly relocated have low survival rates, particularly in minority and low-to-middle income neighborhoods: 1974 Urban Renewal study: (<https://www.kcdc.org/wp-content/uploads/2022/10/A-Case-Study-of-the-Consequences-of-Displacement-Caused-by-Urban.pdf>). "The non-survival rate was highest among the small eating and drinking, food stores, and miscellaneous retail and services."
 - v. Demographic trends show movement of upscale, primarily White workers moving back to urban centers of employment and commerce, and non-White workers and businesses moving or (immigrants) taking up residence in suburban areas (see Appendix 5. 'Great Inversion')
 - 1. As these trends continue, it is even less likely minority businesses will be able to successfully relocate, and even less likely the employees of these businesses will find places they can afford to live.
 - 2. While light rail helps move people to areas of the city where they can recreate and consume, it does not support people who are providing the businesses and jobs for the more metropolitan population.
 - c. Rather than create an estimated \$6-\$7 billion in lost WSLE opportunity costs for Seattle and the region, the money could be better invested in other transit options within the

WSBLE corridor and beyond, yielding a lower carbon footprint, and fewer environmental, social and economic impacts.

4. **Freight, public transit, emergency services and commuters will be disrupted, and productivity impacted as West Seattle's main roads north and south of the WS high bridge are blocked during construction.**

Section 4: Local Environment and Global Climate

1. As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:

- **attracting new riders, and**
- **expanding walkable, car-free urbanism near three new West Seattle light rail stations.**
 - a. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e) forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6-3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total...").
 1. The restatement is used to extend the mitigation period by at least 50 years – to 2080, or later.
 2. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them.
 3. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period
 4. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit.
 5. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy
 - i. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032.
 - ii. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080.**
 - iii. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941 tons.
 1. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941 tons per year reduced, yields a payback period of 48 years – until the year 2080, to mitigate WSLE construction carbon.
 - b. **The Build option will only reduce car and light truck miles traveled by 0.02%** compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total – Table 4.6-1, "Regional Vehicle Miles Traveled and Average Daily Traffic Change"). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.

- c. **Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes.** This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.
- d. **The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.")**
 - TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...")
 - The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2.941 tons generated by the methodology Sound Transit uses in the WSLE FEIS.
 - This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly.
 - While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated.
- e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.
- f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's and King County's goals are to achieve carbon neutrality by 2050.
 - However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use.
 - As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day.
 - Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not.
- g. **The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated.** Sound Transit has already cut about 16,000 trees (apx. 140

acres) for its north-south line, according to a count from [TreePAC.org](https://www.treepac.org/). Those trees would have absorbed an estimated 64,000 tons of carbon a year ([City of Seattle & One tree Planted](#)) – nearly half the carbon output from WSBL construction.

The City of Seattle can ill afford to lose tree canopy. Seattle has lost 255 acres of trees since 2017 (acreage cut by Sound Transit within city limits may be included in the Seattle count). Globally [in 2023, forests and other land ecosystems emitted almost as much carbon dioxide as they absorbed](#), due to fires, deforestation, and other factors.

- a. Eliminating acres of forest will exacerbate Seattle’s heat islands, which are worst around light rail stations, areas where the city’s commerce and employment are concentrated, and within its low income and of-color communities, which Lower economic areas are more prone to heat adverse conditions, fewer parks and tree cover. They are less economically able to afford air conditioning or other means to keep cool.
 - Heat sink areas, King County Executive (& ST Chair) Dow Constantine’s "Three Million Trees Initiative", City of Seattle's Trees for Neighborhoods program, KC Land Conservation Initiative: <https://kingcounty.gov/en/legacy/elected/executive/constantine/news/release/2021/june/23-heat-mapping-results> (June 23, 2021)
- b. The WSLE will eliminate three acres of north Pigeon Point Forest, plus 1-3 more acres of West Seattle green space, and beaver, salmon, heron and other species habitats there and on the Duwamish River and Longfellow Creek.
 - Sound Transit has not calculated costs for man-made elements to replace erosion control, storm water management, oxygen production, carbon sink, shade, and other ecosystem services provided by green infrastructure.
- c. As Sound Transit runs its modest program to replace trees it has eliminated, and Seattle’s recent \$13 million in federal grants will fund planting trees in Delridge and the Chinatown International District , the two entities will simply be working back from the deficit ST will cause with WSLE.
- d. Replacing mature trees with saplings is what Nature does after a natural disaster. ST is imitating a natural disaster.

2. Under Washington’s Climate Commitment Act (CCA), Sound Transit’s claimed level of carbon emissions in the FEIS – 141,000 metric tons over five to six years of construction – qualify it as a “large quantity carbon emissions generator” (LQG). The LQG threshold is 25,000 metric tons of carbon per year.

- a. The best way to avoid emission is not to generate them (see **Minnesota** below).
- b. The WSBL DEIS does not address purchases of carbon offsets, or other high-quantity mitigation plans for this massive output.
- c. The Puget Sound Clean Air Agency’s (PSCAA) analysis finds “. the Chinatown International District and Duwamish Valley neighborhoods facing disproportionate air pollution impacts, impacts from WSBL construction, and more sensitive health outcomes in the form of higher air quality-related hospitalizations.”
- d. PSCAA AQ Director Kathy Strange commented in 2022 on Sound Transit’s WSBL DEIS, that “...transportation emissions will be improved in the long-term because of light rail...” The data prove otherwise.

- e. Currently, [Minnesota is the only U.S. state holding its agencies accountable to its climate goals](#). A provision in its 2024 transportation law requires both state and municipal transportation planning agencies to take the state's climate goals into account when assessing new projects.

3. Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE.

Section 5: Equity

1. Sound Transit's WSLE proposal does not prioritize equity.

- a. The WSLE will serve the more affluent parts of West Seattle, while travel from less affluent, more diverse areas with more mobility disadvantaged citizens will require more transfers and take longer
- b. A "transfer penalty" will affect riders arriving at stations by bus at ground level. They must either ride or climb multiple levels up or down to reach a train. At the Junction station, walk time may add five minutes to the transfer, and the wait time for the next train may add another 10.
- c. Light rail will not improve access for residents who live in West Seattle's transit deserts (those lacking convenient access to transit within ¼ mile walk).
 - i. Metro buses re-deployed after the 2042 opening of WS-CID service will not deliver residents remaining in West Seattle to new locations of businesses and services WSLE will have displaced.
 - ii. WSLE will instead encourage more use of private vehicles to reach these locations.
- d. Elimination of the Frye Business Center and commercial properties to the north and south for construction of the Delridge and Avalon light rail stations will:
 - i. exacerbate the "food desert" of grocery and prepared food providers between North Delridge and California Ave SW, for the area's mixed demographic communities
 - ii. eliminate the walkable/15-minute Delridge-Avalon neighborhood, and deprive these communities of gathering places, and medical, social, business and recreational services

2. To make way for light rail, WSLE will eliminate over one hundred houses and apartments.

- a. The full number of residential buildings to be razed cannot be estimated, as Sound Transit has not chosen a final route. It will bulldoze everything from single houses in Delridge to 92 apartments in Jefferson Square. The Executive Summary of the WSLE FEIS indicates that the Preferred Alternative will require displacing 165 to 173 residential properties, and 132 to 133 businesses employing 1,230 people.
- b. Despite large numbers of new housing units and apartments built in West Seattle since 2014, rent and purchase costs have increased, not decreased. That has pushed out less wealthy residents (see *Seattle Times* May 12, 2024) and increased their needs to travel longer distances for work, shopping and entertainment, most often by car. Many have moved to other cities.

- c. Transit-oriented development (TOD -- dense housing, such as apartments, multiplexes, and ADUs) has been built along the Delridge, Avalon and East Junction bus routes of Rapid Ride H and C, and 21 and 128. Sound Transit will bulldoze a significant portion for the rail line, and not replace it for up to 10 years, further depriving West Seattle of affordable housing, while wasting public resources.

3. The Sound Transit Board has the authority to choose the No Build option for WSLE.

- a. Under Section 2 of the ST3 package that voters approved in 2016, the board must reconsider projects that are infeasible, unaffordable and/or unbuildable. WSLE is all three.
- b. Contrary to what regional and city leaders are saying, the WSBLE and WSLE light rail proposals can be re-considered, and better transit options can be chosen – under the No Build option
- c. No Build is a legitimate, legal, and responsible choice, which is included, under federal and state law, in all environmental reviews of large, disruptive transit construction projects. Based on the findings of the environmental process through this date, project sponsors should adopt the No Build option.
- d. The No Build option for WSLE will only affect the West Seattle corridor:
 - i. other ST3 projects could continue to be studied and implemented, as they are subject to a separate environmental process, and
 - ii. Sound Transit will still be able to get [Federal Capital Investment Grants](#) for non-light rail transit, and for expansion of high-capacity fixed-route bus transit.

Concluding Summary:

- 1. The Downtown-West Seattle (WSLE) light rail line should not be built (No Build option). Within the No Build option, the Ballard-Downtown segment should also be reconsidered.
- 2. Sound Transit's WSLE presents more disadvantages than advantages, including overwhelmingly negative social, economic and environmental impacts. As such, it fails to satisfy basic criteria set forth by ST3 and its FEIS for improving corridor transit. The costs, and negative environmental, economic and residential impacts of WSLE outweigh the benefits of building it
- 3. Current transit modes carry more passengers now, without transfers and wait times, than light rail promises to carry when completed. WSLE will degrade rather than improve the ridership experience.
- 4. The 146,000 tons of carbon that WSLE construction will generate – reduced from 614,000 tons in the Draft EIS -- plus elimination of and damage to acres of forest and habitat, will be more than the benefits of a short light rail line can mitigate through year 2105.
- 5. Choosing the light rail investment over more flexible, effective and cheaper transit modes presents opportunity costs for the City of Seattle, and the regional transit network.
- 6. Sound Transit can achieve better ridership by continuing to expand and electrify King County Metro and ST Regional Express bus services, on the West Seattle peninsula, W. Seattle-Downtown corridor, and beyond.

Any Sound Transit taxing district resident opposed to the construction of the West Seattle light rail extension has three paths of action:

1. Use emailtheboard@soundtransit.org to contact all board members. As 17 of its 18 members are elected officials, and accountable to voters, [each can be contacted directly](#) by their own constituents.
 - The Seattle members include City Council Member [Daniel Strauss](#), Mayor [Bruce Harrell](#), Council Member [Rob Saka](#) **, ST Board Chair [Dow Constantine](#) **, and King County Council Member [Girmay Zahilay](#). (** indicates lives in West Seattle). City Council Member Rob Saka chairs the City Council's Transportation Committee. [King County Council Member Teresa Mosqueda](#) also lives in West Seattle.
 - Include specific information from this document in messages to officials
 - Contact board and council members by letter, phone and email, and urge (or demand) that they:
 - Stand up for businesses, jobs, housing, communities, and the environment in Seattle.
 - Call for adopting the **No Build Option** still listed in the FEIS for WSLE and visible for years in the DEIS for WSBL.
 - Require Sound Transit to consider cheaper, less destructive, lower carbon transit options for the Downtown-West Seattle corridor than rail.
 - Support using other modes, including buses, bus rapid transit, and other transit service connections to the regional rail network
2. Contact Port of Seattle Commissioners [Fred Felleman](#), Commissioner-Secretary [Ryan Calkins](#), Commissioner-Vice President [Toshiko Hasegawa](#), Commissioner-President [Hamdi Mohamed](#), Regional Transportation Manager [Geraldine Poor](#), Chief of Staff [Aaron Pritchard](#), and management staff [LeeAnne Schirato](#), [Kathy Roeder](#) and [Sabrina Bolieu](#).
 - Ask them to object vigorously and officially to impacts the WSLE bridge will cause, and that the Port of Seattle has opposed, including obstruction of the East and West Duwamish waterways, impairment of maritime traffic and businesses, damage to the Duwamish River and Longfellow Creek ecosystems, and a huge carbon footprint.
3. Email local business organizations that will be affected:
 - * [West Seattle Chamber of Commerce](#)
 - * [West Seattle Junction Association](#)

Appendix

Additional Considerations from Research Literature

1. Consumer willingness to fund light rail development decreases as cost increases

[Economists at the Federal Reserve Bank of St Louis](#) showed that when consumers understand the actual costs of getting light-rail services, the amount is generally more than they are willing to pay.

Nationwide, annual light-rail operating costs (\$778.3 million) far exceed fare revenue (\$226.1 million). The balance (\$552.2 million) is paid for with tax dollars. Examples (see also Snohomish-King-Pierce below): Fare revenues cover only 28.2% of system operating costs for St. Louis, 19.4% for Baltimore and 21.4% for Buffalo. If construction costs are added, losses become so large, no light-rail system can possibly recoup its costs.

Based solely on dollar cost, economists at the Federal Reserve Bank of St. Louis suggest that annual light-rail subsidies in St. Louis could instead be used more efficiently to buy a hybrid Toyota Prius every five years and pay annual maintenance costs of \$6,000 for 7700 low-income transit riders – with minimal pollution increases, and only a 0.5 percent increase in traffic congestion. Funds would still be left for all other MetroLink riders to pay for ride-share and bus fares.

Houston: When [Houston Metro proposed the Purple line in 2008](#), it estimated a \$591 million cost, and 28,750 weekday riders. By September 2020, costs reached \$822 million, with daily expected ridership decreased to 5,230, meaning a per rider cost of about \$150,000 to build the Purple Line.

Snohomish-King-Pierce Counties:

1. [Sound Transit revenues do not cover its operating expenses](#)
 - a. Sound Transit farebox revenues in 2023 covered only 16% of Link light rail operating costs (lower than the 40% minimum policy threshold), 9% of ST Express bus operating costs (below the 20% threshold), and 7% of Sounder costs (below the 23% threshold).
 - b. Revenue vs. cost gaps widen more when construction costs are added. Examples:
 - i. Adding together operations, maintenance and construction costs, light rail fare revenues cover less than 3%.
 - ii. For Sounder North commuter rail, ST over-estimated ridership by 90%, and underestimated total costs vs. farebox revenue by 95%.
 - c. As regional revenues will never cover or recoup its full costs, Sound Transit must add millions of dollars in federal grants and borrowed money to cover them.

2. Station development does not generally benefit low-income transit users

A [2019 University of Houston study](#) finds mixed effects on the welfare of neighborhoods after light rail construction. Researchers estimated an \$11,000 average increase in median income for neighborhoods near the new rail line development; but most gains go to high-income neighborhoods, while low-income neighborhoods see their income decline. The observed income polarization may be explained by poverty magnet and gentrification effects occurring simultaneously across the treated neighborhoods.

Light Rail Transit (LRT) does not appear to consistently deliver on its progressive policy goals of alleviating labor-skill mismatch, creating time cost savings, and increasing income mobility.

3. Light rail development does not reduce congestion

[Los Angeles: While light rail investments may increase transit accessibility and ridership within high-demand corridors, it does not reduce congestion.](#)

4. Per Capita Transit Ridership Is Declining

[Since 2013, U.S. transit ridership has declined, despite continued growth in population.](#)

Ridership has peaked and decreased seven different times since 1980, but overall, transit ridership per capita has decreased by nearly 15%. Researchers are evaluating economic considerations, fuel price, changing modal choices, and other areas as possible causes for the decline.

Demographic trends help to explain declining transit usage:

a. The U.S. [population is aging](#). While young age cohorts have a higher propensity for transit use, they represent a lower share of the population.

b. Simultaneously, significant population declines in some of the counties with high-quality transit service and use is being mirrored by population growth in counties with lower levels of transit service and use. Rapidly growing counties had half the rate of commuting to work by transit as did rapidly declining counties.

c. [Over 90% of U.S. population growth in 2023 occurred outside of its 124 largest cities.](#)

Among the 124 cities that the U.S. Census Bureau reports with populations over 200,000, about a third have lost population except 14 over 200,000 populations cities in Texas, and nine in Florida. Medium-sized cities in Florida, the Carolinas, and Las Vegas suburbs also added to the population. Americans are presently trading dense, urban, transit-oriented cities for less expensive, more spacious living elsewhere. How this will play out in transit development and politics are key questions.

5. Great Inversion

Suburbia increasingly sorted on bases of socio-economic status and race ([Nijman, 2020](#); [Nijman & Clery, 2015](#)). As suburbs continue growing:

- a. based on economic affordability ([Kolko, 2017](#)),
- b. central-cities appear to revive and renew growth, as city as “the office,” especially for growing numbers of self-employed and freelancers, in the new urban, knowledge transfer and networking economy, that thrives in a high density and high circulation environment ([Carlino, 2015](#); [Kloosterman, 2020](#); [Scott, 2017](#)).

Cities and city centers as preeminent sites of consumption, consumer services, and amenities: [Glaeser, Kolko, and Saiz \(2000\)](#). Also, rise of cities as sites of *consumption* ([Jayne, 2005](#))

Significance of actual vs. relative numbers of workers, types of workers, incomes, and vulnerabilities of ‘gig economy’ and ‘sharing/platform economy’: ([Graham, Hjorth, & Ledonvirta, 2017](#); [Davidson & Infranca, 2016](#); [Shambaugh, Nunn, & Bauer, 2018](#)).

6. Public transit is losing its customer base

During the pandemic, people formed new mobility habits, and most are not returning to regular use of urban buses and trains. In a 2022 survey of 38 transit agencies worldwide, researchers found a 10% loss in the transit customer base, as reported by the [International Association of Public Transit](#).

As of spring 2024, Sound Transit has not yet consistently reached its original 2010 light rail ridership target to the University District, even including the extension to Northgate, according to the U.S. Federal Transit Administration's National Transit Database (NTD). ST's original goal was an average of 2.7 million boardings per month. While it has touched that level in a few months since 2018, such as for Taylor Swift events in SODO, this ridership level has not been reached on average in 2024. Across all central Puget Sound transit agencies, NTD reports transit ridership as of April 2024 was 30% lower than in pre-pandemic 2019.

6. City of Seattle critique of ST3 DEIS (quote of excerpts):

- Sound Transit is considering cost savings refinements in response to its 2021 ST3 Realignment. Some of these proposed strategies are drastic.
 - We discourage scope reductions that do not bring commensurate benefit to the system and its riders, and that are not consistent with what was committed to voters.
 - We do not support strategies that would reduce access to the system.
- The City supports studying refinements that help control costs and provide meaningful benefits to local communities and the broader transit system and its riders, including:
 - Mix-and-match refinements for flexibility to choose segment alternatives that provide greatest benefit or fewest impacts;
 - Refinements to stations that would improve safe, non-motorized access;
 - Refinements that would avoid, minimize, or mitigate adverse project impacts.

7. Pandemic-caused vacancy rate increases in downtown areas

Between April 2019 and January 2023, [Seattle had the second-highest downtown commercial vacancy rate in the U.S. \(14.2%\)](#). ["Seattle's office vacancy rate reached 23.2% in July 2024, according to a recent report by Commercial Edge Research,](#) highlighting the city's struggle to adapt to post-pandemic market conditions,"

While Metro Transit ridership in 2024 has recovered to 75% of pre-COVID levels, full ridership recovery is questionable as work from home + hybrid structures continue, and central employment and commerce locations diversify from downtown Seattle.

8. Three factors drive excessive U.S. transit project costs

As Sound Transit cost overruns have been chronic, the [New York experience provides a cautionary tale](#) about how to structure transit projects, and how to avoid pitfalls.

Factors that add approximately 85% to costs include extra money going to red tape, wasted contingencies, paying workers during delays, defensive design, and profit. Specifically, the factors include:

- Lack of design standardization: this leads to fewer economies of scale, the inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process.
- Labor: 40-60% of the project's hard costs in the U.S. Labor costs in low-cost cases: Turkey, Italy, and Sweden are in the 19-30% range; Sweden, the highest-wage case among them, is 23%.
- U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher.

Appendix C. Comments Received on the Final EIS and Responses

Communication ID: 556066 – Rethink the Link

#	Comments	Responses
1	<p>We ask the board to vote NO on moving WSLE to "design phase."</p> <p>Every time you use "the voters have spoken" as your rationale for proceeding with WSLE, you know that your voters did NOT approve this in the 2016 ST3 package. They approved a WSBLE package that would improve transit, and study light rail. Sound Transit has not used ST3 money yet to improve transit in the three-county region. Sound Transit HAS generated a light rail study, that found WSLE will not improve transit ridership, reduce congestion, or contribute to social justice and economic development. It will irreparably damage the environment, exacerbate heat islands, create food deserts and not improve transit deserts between SODO and the West Seattle Junction.</p> <p>The board has been acting as if costs are irrelevant to this project. In fact, Motion 2024-59 directs ST's CEO to shift WSLE baseline costs to make the project, which is \$5 billion over what voters approved in 2016, appear more affordable over a longer term than voters approved. We urge you to vote NO on this motion. You have all received our FEIS document, assembled by regional transit experts, and attached again here. Appendix 8 is a consulting document that found three factors driving excessive U.S. transit project costs. It provides warnings for ST, and guidance on how to avoid pitfalls that add approximately 85% to transportation costs:</p> <ul style="list-style-type: none"> • Lack of design standardization on — leading to fewer economies of scale, inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process. • Labor costs: about 40-60% of US projects' hard costs, vs. labor costs in other countries studied (Turkey, Italy, and Sweden), that ranged from 19%-30% with Sweden as highest-wage case at 23%. • U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher; and extra money for red tape, wasted contingencies, paying workers during delays, defensive design, and profit. <p>Are WSLE economics irrelevant to this board? Are you believing what Transportation Choices Coalition has told you — that money grows on trees? The term "affordable schedule" should be meaningful in the WSLE EIS process: you should be understanding</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>that taxpayer funds and patience are limited, especially as WSLE is now 3 times more expensive than voters approved in 2016, and per costs have climbed to \$1.3 million/rider. I urge you to stop using my 2016 approval vote on ST3, for \$1.75 billion, as your excuse for proceeding with WSLE alone for \$7 billion. For that cost, you could electrify the entire Metro Transit fleet in King County, and improve transit across three counties. You remind me of an old joke about two women eating in a restaurant. One says, 'This food is terrible,' and the other says, "And such tiny portions!" For a terrible WSLE proposal, we get so little public transit.</p>	
2	<p>Since the 2016 ST3 vote, Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE. With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension (WSLE) does not satisfy the ST3 and DEIS criteria, and should not be built. The experts found that:</p> <ul style="list-style-type: none"> • WSLE transit times and therefore ridership will degrade, not improve West Seattle transit service after the WSLE and Ballard LE open in 2032 and 2042 respectively • The construction generation of carbon will be more than carbon-reducing impacts of WSLE trains can mitigate over five future decades of WSLE operation. • Acres of forest and habitat will be eliminated, and much more of it irreparably damaged • Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network: • Economic development in West Seattle and Chinatown-International District will be set back for at least a decade • Equity, community-building and social justice will be set back at least a decade, • And raising the question, based upon the newest, September 2024 WSLE cost estimate: "How can six to seven billion dollars be better spent to improve public transit?" 	<p>Your support for the No Build Alternative has been noted.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
3	<p>Lower carbon, less expensive and less destructive public transit options than WSLE have been studied by Sound Transit, are available and serving West Seattle riders better now than rail will in the future, including but not limited to:</p> <ul style="list-style-type: none"> a. Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane b. Add north and south Busway exits from east end of West Seattle Bridge c. Add to exclusive bus lanes in West Seattle <p>Complete Metro Transit initiative to electrify bus fleet</p>	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>
4	<p>1. The WSLE light rail plan will not improve transit or rider experience on the Downtown- West Seattle corridor. It will make them worse.</p> <ul style="list-style-type: none"> a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though heavy traffic may cause it to take longer. b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see "transfer penalty" in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer. c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers. <p>2. Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.</p> <ul style="list-style-type: none"> a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment. b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences) i. The FEIS sorts ridership forecasts based on several options: <ul style="list-style-type: none"> a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built b) Two station scenario, without Avalon station c) Three station scenario with Delridge, Avalon and Junction stations 	<p>Chapter 3, Transportation Environment and Consequences, provides ridership forecasts and travel times.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<ul style="list-style-type: none">ii. Appendix 2 of Sound Transit's Transportation Technical Report shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day.d. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix,** Per Capita Transit Ridership Is Declining**).	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
5	<p>The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle corridor.</p> <ol style="list-style-type: none"> a. ST's WSBLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service. b. Presently, public and private roadway buses, vanpools and ride-share services can be programmed to carry more riders than light rail, often faster and less expensively. And their routes can be modified - unlike light rail -- as conditions change. <ol style="list-style-type: none"> 1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers 2. King County Metro: <ol style="list-style-type: none"> a) is planning to transition its entire fleet of buses to electric power. b) has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas. 	<p>See response to comment 3 regarding mode selection for the West Seattle Link Extension. A list of bus route service changes for each of the Build Alternatives is provided in Section 3.3.2, Build Alternatives, of Appendix N1, Transportation Technical Report of this West Seattle Link Extension Final EIS. Bus service assumptions for both the No Build Alternative and Build Alternatives were developed by Metro and Sound Transit as part of the project's Transit Service Integration technical memorandum, provided as Appendix B, Transit Service Integration Technical Memorandum, to Attachment N.1A of Appendix N1. Bus service would be restructured to integrate with the project, which would result in removing or truncating some lines but generally replacing them with reliable, high frequency light rail service. The bus service hours savings from removing or truncating routes would be redeployed elsewhere in accordance with Metro's service guidelines. The 2042 Build Alternatives assume there will be changes to bus service in the West Seattle Link Extension project corridor to integrate with the new light rail line. The service changes are based on Metro Connects and coordination with Metro regarding this project.</p>
6	<p>As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:</p> <ul style="list-style-type: none"> • attracting new riders, and • expanding walkable, car-free urbanism near three new West Seattle light rail stations. <ol style="list-style-type: none"> a. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e) forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6- 3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total..."). <ol style="list-style-type: none"> 1. The restatement is used to extend the mitigation period by at least 50 years-to 2080, or later. 	<p>Please refer to Section 4.6, Air Quality, and Section 4.10, Energy Impacts, of the West Seattle Link Extension Final EIS for air quality and energy analyses. As described in Section 4.6.6.1.2, Construction Emissions, construction emissions were calculated using FTA's Transit Greenhouse Gas Estimator V3.0. The guidance for this is listed in the references and is available online at: https://www.transit.dot.gov/sites/fta.dot.gov/files/2022-04/FTA-GHG-Emissions-Estimator-v3-User-Guide.pdf. Printouts of the results from this estimator are available in Appendix L4.6E, Greenhouse Gas Analysis. Section 4.6.6.1.2 also discusses the emerging nature of this field of analysis and provides additional context for interpreting these results.</p> <p>See Appendix L4.6E of the Final EIS for more information on the greenhouse gas emissions modeling.</p> <p>For more information on Sound Transit's environmental policy and sustainability initiatives, please visit Sound Transit's website at</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>2. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them.</p> <p>3. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period</p> <p>4. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit.</p> <p>5. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy</p> <p>i. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032.</p> <p>ii. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080. **</p> <p>iii. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941tons.</p> <p>1. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941tons per year reduced, yields a payback period of 48 years - until the year 2080, to mitigate WSLE construction carbon.</p> <p>b. The Build option will only reduce car and light truck miles traveled by 0.02% compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total -Table 4.6-1, "Regional Vehicle Miles Traveled and Average Daily Traffic Change"). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.</p> <p>c. Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes. This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon</p>	<p>https://www.soundtransit.org/get-to-knowus/environment-sustainability.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>Leadership Forum (CLF), a nonprofit, industry-academic organization at the University of Washington.</p> <p>d. The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.")</p> <ul style="list-style-type: none"> • TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...") • The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2.941 tons generated by the methodology Sound Transit uses in the WSLE FEIS. • This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly. • While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated. <p>e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.</p> <p>f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's and King County's goals are to achieve carbon neutrality by 2050.</p> <ul style="list-style-type: none"> • However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays 	


Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>the WSLE opportunity for drivers to reduce their personal vehicle use.</p> <ul style="list-style-type: none">As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day.Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not. <p>g. The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated. Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from TreePAC.org. Those trees would have absorbed an estimated 64,000 tons of carbon a year (City of Seattle & One tree Planted)- nearly half the carbon output from WSBLE construction.</p>	

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FEIS Comments

From knitter.wells@gmail.com <knitter.wells@gmail.com>
on behalf of
West Seattle Bike Connections <westseattlebikeconnections@gmail.com>
Date Thu 10/24/2024 1:08 PM
To West Seattle Link Extension <westseattlelink@soundtransit.org>

 1 attachments (94 KB)

Sound Transit FEIS Comments 2024-10-18.pdf;

You don't often get email from westseattlebikeconnections@gmail.com. [Learn why this is important](#)

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

West Seattle Bike Connections is a volunteer-run organization dedicated to making West Seattle a safer and better place to walk and bike. My colleagues and I found some items in the FEIS documents that warrant attention before design advances. Please forward these comments to the appropriate people at Sound Transit for consideration.

Thank you so much,

Katherine Wells

westseattlebikeconnections.org



October 24, 2022

WSBLE Final Environmental Impact Statement Comments

% Lauren Swift

Sound Transit

401 S Jackson St

Seattle, WA 98104

Submitted via email to westseattlelink@soundtransit.org

Subject: West Seattle Link Extension Final Environmental Impact Statement

To Whom It May Concern:

West Seattle Bike Connections (WSBC) is a volunteer community organization working to make our corner of the city a more comfortable place to bike and walk. Most West Seattle neighborhoods will be within biking distance of future Sound Transit stations and our comments focus on impacts related to active transportation integration (walking, biking, and other non-motorized transportation). There are a number of points in the current FEIS for the West Seattle and SODO segments that we feel should be highlighted before design work advances.

3.7.3.4

"Alternatives DEL-1a and DEL-3 would remove the sidewalk on the south side of Southwest Genesee Street between Southwest Avalon Way and 26th Avenue Southwest; DEL-4 would remove a portion of that sidewalk segment. This sidewalk runs alongside the West Seattle Golf Course fence; pedestrians would instead travel along the sidewalk on the north side of the street. A bus stop would remain on the south side of Southwest Genesee Street with access maintained from the north sidewalk by a pedestrian crossing and treatments to provide safe access."

Please try to reroute or otherwise retain the sidewalk on the south side of the street if one of these alternatives is chosen. Having to cross the street twice to get where you're going is burdensome, dangerous, and liable to be ignored by someone walking to a bus stop.

3.8.3.4

"Preferred Option DEL-6b would also require the permanent closure of 32nd Avenue Southwest. Sound Transit is considering options to provide a pedestrian connection from Southwest Andover Street to 32nd Avenue Southwest south of the cul-de-sac; however, it is unknown if a connection would be feasible until final design. If a pedestrian connection cannot be maintained, then non-motorized users would likely divert to Southwest Avalon Way, where there are higher numbers of vehicle-pedestrian conflicts."

Would the closure of 32nd Avenue SW make the Fauntleroy Expressway overpass unusable? The pedestrian overpass is a well-used facility and saves cyclists and pedestrians many blocks of travel over using alternate routes, and should be preserved if at all possible.

3.11.2.4

“All Build Alternatives in the SODO Segment would require relocation of 26-kilovolt and 230-kilovolt utilities along the SODO Busway and 6th Avenue South, which would require short-term closures of sections of the SODO Trail, South Holgate Street, South Lander Street, and 6th Avenue South during different stages of construction. In addition to the utility relocation closures, for each alternative, the SODO Trail would be closed for the duration of light rail construction between South Stacy Street and South Forest Street (approximately 4 years). Pedestrians and bicycles would be detoured to 6th Avenue South, with east-west access maintained at adjacent street crossings. With Preferred Option SODO-1c, Alternative SODO-1a, and Option SODO-1b, the sidewalks on both sides of South Lander Street between 4th Avenue South and 6th Avenue South would be closed for approximately 3 years during construction of the South Lander Street overpass. During this time, pedestrians would be detoured to a temporary connection south of South Lander Street to connect between 4th Avenue South and 6th Avenue South.”

What is meant by “detoured to a temporary connection south of South Lander Street”? The next cross-street is quite far away.

It makes sense that the SODO Trail will be closed during construction but it sounds like 6th Avenue South will be restricted at times due to relocation of utilities. How can cyclists and pedestrians be kept safe when 6th Avenue South is both restricted AND carrying extra detour traffic?

3.11.3.4

“Preferred Alternative DUW-1a and Option DUW-1b would require a detour of the Delridge Connector Trail to the West Seattle Bridge Trail during construction. Rather than running along the east side of Delridge Way Southwest, the trail would be detoured along the 23rd Avenue Southwest pathway on the west side of Delridge Way Southwest (starting at roughly Southwest Charlestown Street), connecting to the trail on the north side of the West Seattle Bridge. The 22nd Avenue Southwest connection to the Delridge Connector Trail and the stairway between 22nd Avenue Southwest and Delridge Way Southwest would also be temporarily closed during construction. Bicyclists would be detoured via Southwest Andover Street and 23rd Avenue Southwest, where they could use the new signal at Delridge Way Southwest and 23rd Avenue Southwest to access the Delridge Connector Trail detour route.”

The 23rd Avenue SW Pathway on the west side of Delridge Way is far too narrow, dark and bumpy for the number of users it will see during construction. It's a useful connector trail, however, and will be a fantastic permanent facility for accessing the Delridge station if improved.

3.11.3.4

“Moreover, there may be periods of construction when the sidewalk on the west side of West Marginal Way Southwest and the planned pedestrian path of the east side of West Marginal Way Southwest are closed concurrent with the Southwest Marginal Place closure. Due to the limited street network and topographical constraints, pedestrian and bicycle travel on existing facilities may not be possible during those times. Sound Transit would continue to consider alternative means to transport pedestrians and bicycles through the corridor.”

This situation needs to be avoided if at all possible. There is no reasonable and safe north-south bike detour route east of the Duwamish River, and a detour to Delridge Way or other routes within West Seattle does not exist. And we need to consider that the West Marginal Way SW route is used by large numbers of cyclists when the low Spokane St bridge is closed due to maintenance or malfunction.

3.11.4.4

“During construction of Preferred Option DEL-6b and Alternative DEL-7, 26th Avenue Southwest south of Southwest Andover Street would be closed on nights and weekends. This would include closure of the sidewalks on both sides of 26th Avenue Southwest. This roadway is a neighborhood greenway so bicyclists would need to use an alternate route such as 28th Avenue Southwest. No additional non-motorized effects beyond the general roadway impacts described in the Construction Impacts Common to All Alternatives section are expected for Preferred Option DEL-6b.”

This is a pretty major closure for bicyclists and 28th Ave SW isn't a great replacement if cars are also using 28th as a detour route. Traffic calming infrastructure on 28th such as speed humps and chicanes could help keep cyclists safe.

3.11.4.4

“With Alternative DEL-1a, Option DEL-1b, and Alternative DEL-3, the closure of Southwest Genesee Street would temporarily preclude its use by pedestrians and cyclists as well as motorized vehicles. With Alternative DEL-4, portions of Southwest Genesee Street would be partially closed. The irregular street grid in that area would require some out-of-direction travel. Traffic diversion from Southwest Genesee Street would likely also cause an increase in vehicle traffic on 26th Avenue Southwest, which is a neighborhood greenway.”

26th Ave SW already sees a lot of car traffic when Delridge Way backs up. Diverters would be a simple way to keep the greenway safe and route cars to arterials.

WSLE Final Environmental Impact Statement Comments
West Seattle Bike Connections

3.11.5.1.1: Construction scenario 4

“Partial closure of the intersection at Fauntleroy Way Southwest and Southwest Avalon Way. One approach lane and one departure lane were assumed at each leg of the intersection. (Construction activities would close one quadrant of the intersection at a time; this analysis assumes that a consistent amount of vehicular capacity would be maintained during each quadrant closure).”

This partial closure of Fauntleroy Way would impact the protected bike lanes on Avalon Way. Would cyclists still have a lane of their own in this scenario? This seems like a major impact that isn't mentioned in the Non-motorized Facilities sections.

We also have generalized concerns about the SODO stations that involve a car overpass. While the Lander St overpass will decrease interactions between people, vehicles and trains (and keep traffic moving) it also means that anyone traveling east-west or accessing the station will have to go up a fairly steep grade only to go down to get where they're going. Please try to add elevators on both ends of the overpass if the sidewalk will be barely ADA accessible.

Sincerely,

Katherine Wells, on behalf of
West Seattle Bike Connections
westseattlebikeconnections@gmail.com

Appendix C. Comments Received on the Final EIS and Responses

Communication ID: 556076 – West Seattle Bike Connections

#	Comments	Responses
1	<p>There are a number of points in the current FEIS for the West Seattle and SODO segments that we feel should be highlighted before design work advances.</p> <p>3.7.3.4</p> <p>“Alternatives DEL-1a and DEL-3 would remove the sidewalk on the south side of Southwest Genesee Street between Southwest Avalon Way and 26th Avenue Southwest; DEL-4 would remove a portion of that sidewalk segment. This sidewalk runs alongside the West Seattle Golf Course fence; pedestrians would instead travel along the sidewalk on the north side of the street. A bus stop would remain on the south side of Southwest Genesee Street with access maintained from the north sidewalk by a pedestrian crossing and treatments to provide safe access.”</p> <p>Please try to reroute or otherwise retain the sidewalk on the south side of the street if one of these alternatives is chosen. Having to cross the street twice to get where you’re going is burdensome, dangerous, and liable to be ignored by someone walking to a bus stop.</p>	<p>The Southwest Genesee Street right-of-way has a limited width and is bordered by parkland and a steep slope; therefore, Alternatives DEL-1a and DEL-3 result in the removal of the sidewalk on the south side of the street.</p> <p>These alternatives were not selected as the project to be built.</p>
2	<p>3.8.3.4</p> <p>“Preferred Option DEL-6b would also require the permanent closure of 32nd Avenue Southwest. Sound Transit is considering options to provide a pedestrian connection from Southwest Andover Street to 32nd Avenue Southwest south of the cul-de-sac; however, it is unknown if a connection would be feasible until final design. If a pedestrian connection cannot be maintained, then non-motorized users would likely divert to Southwest Avalon Way, where there are higher numbers of vehicle-pedestrian conflicts.”</p> <p>Would the closure of 32nd Avenue SW make the Fauntleroy Expressway overpass unusable? The pedestrian overpass is a well-used facility and saves cyclists and pedestrians many blocks of travel over using alternate routes, and should be preserved if at all possible.</p>	<p>The Fauntleroy Expressway Overpass would remain open. Please see Section 3.7, Affected Environment and Impacts during Operation – Non-motorized Facilities, of the West Seattle Link Extension Final EIS, for a description of impacts to non-motorized facilities with Preferred Option DEL-6b.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
3	<p>3.11.2.4</p> <p>“All Build Alternatives in the SODO Segment would require relocation of 26-kilovolt and 230-kilovolt utilities along the SODO Busway and 6th Avenue South, which would require short-term closures of sections of the SODO Trail, South Holgate Street, South Lander Street, and 6th Avenue South during different stages of construction. In addition to the utility relocation closures, for each alternative, the SODO Trail would be closed for the duration of light rail construction between South Stacy Street and South Forest Street (approximately 4 years). Pedestrians and bicycles would be detoured to 6th Avenue South, with east-west access maintained at adjacent street crossings. With Preferred Option SODO-1c, Alternative SODO-1a, and Option SODO-1b, the sidewalks on both sides of South Lander Street between 4th Avenue South and 6th Avenue South would be closed for approximately 3 years during construction of the South Lander Street overpass. During this time, pedestrians would be detoured to a temporary connection south of South Lander Street to connect between 4th Avenue South and 6th Avenue South.”</p> <p>What is meant by “detoured to a temporary connection south of South Lander Street”? The next cross-street is quite far away.</p> <p>It makes sense that the SODO Trail will be closed during construction but it sounds like 6th Avenue South will be restricted at times due to relocation of utilities. How can cyclists and pedestrians be kept safe when 6th Avenue South is both restricted AND carrying extra detour traffic?</p>	<p>As noted in Section 3.11.6.4, Non-motorized Facilities, of the Final EIS and Section 6.4.2, Construction Impacts, of Appendix N.1, Transportation Technical Report, of the Final EIS, Sound Transit will work with the City of Seattle to develop and implement a construction management plan to provide alternate facilities for non-motorized travel that, to the extent feasible, offer a similar level of protection and comfort to the temporarily closed facility.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
4	<p>3.11.3.4</p> <p>“Preferred Alternative DUW-1a and Option DUW-1b would require a detour of the Delridge Connector Trail to the West Seattle Bridge Trail during construction. Rather than running along the east side of Delridge Way Southwest, the trail would be detoured along the 23rd Avenue Southwest pathway on the west side of Delridge Way Southwest (starting at roughly Southwest Charlestown Street), connecting to the trail on the north side of the West Seattle Bridge. The 22nd Avenue Southwest connection to the Delridge Connector Trail and the stairway between 22nd Avenue Southwest and Delridge Way Southwest would also be temporarily closed during construction. Bicyclists would be detoured via Southwest Andover Street and 23rd Avenue Southwest, where they could use the new signal at Delridge Way Southwest and 23rd Avenue Southwest to access the Delridge Connector Trail detour route.”</p> <p>The 23rd Avenue SW Pathway on the west side of Delridge Way is far too narrow, dark and bumpy for the number of users it will see during construction. It's a useful connector trail, however, and will be a fantastic permanent facility for accessing the Delridge station if improved.</p>	<p>Please see Section 6.4, Potential Mitigation Measures, of Appendix N.1, Transportation Technical Report, for information on the proposed mitigation for this trail closure.</p>
5	<p>3.11.3.4</p> <p>“Moreover, there may be periods of construction when the sidewalk on the west side of West Marginal Way Southwest and the planned pedestrian path of the east side of West Marginal Way Southwest are closed concurrent with the Southwest Marginal Place closure. Due to the limited street network and topographical constraints, pedestrian and bicycle travel on existing facilities may not be possible during those times. Sound Transit would continue to consider alternative means to transport pedestrians and bicycles through the corridor.”</p> <p>This situation needs to be avoided if at all possible. There is no reasonable and safe north-south bike detour route east of the Duwamish River, and a detour to Delridge Way or other routes within West Seattle does not exist. And we need to consider that the West Marginal Way SW route is used by large numbers of cyclists when the low Spokane St bridge is closed due to maintenance or malfunction.</p>	<p>Your comment has been noted.</p> <p>As noted, Sound Transit will work with the City of Seattle to develop and implement a construction management plan to provide alternate facilities for non-motorized travel that, to the extent feasible, offer a similar level of protection and comfort to the temporarily closed facility.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
6	<p>3.11.4.4</p> <p>“During construction of Preferred Option DEL-6b and Alternative DEL-7, 26th Avenue Southwest south of Southwest Andover Street would be closed on nights and weekends. This would include closure of the sidewalks on both sides of 26th Avenue Southwest. This roadway is a neighborhood greenway so bicyclists would need to use an alternate route such as 28th Avenue Southwest. No additional non-motorized effects beyond the general roadway impacts described in the Construction Impacts Common to All Alternatives section are expected for Preferred Option DEL-6b.”</p> <p>This is a pretty major closure for bicyclists and 28th Ave SW isn't a great replacement if cars are also using 28th as a detour route. Traffic calming infrastructure on 28th such as speed humps and chicanes could help keep cyclists safe.</p>	<p>Your comment has been noted.</p> <p>As noted, Sound Transit will work with the City of Seattle to develop and implement a construction management plan to provide alternate facilities for non-motorized travel that, to the extent feasible, offer a similar level of protection and comfort to the temporarily closed facility.</p>
7	<p>3.11.4.4</p> <p>“With Alternative DEL-1a, Option DEL-1b, and Alternative DEL-3, the closure of Southwest Genesee Street would temporarily preclude its use by pedestrians and cyclists as well as motorized vehicles. With Alternative DEL-4, portions of Southwest Genesee Street would be partially closed. The irregular street grid in that area would require some out-of-direction travel. Traffic diversion from Southwest Genesee Street would likely also cause an increase in vehicle traffic on 26th Avenue Southwest, which is a neighborhood greenway.”</p> <p>26th Ave SW already sees a lot of car traffic when Delridge Way backs up. Diverters would be a simple way to keep the greenway safe and route cars to arterials.</p>	<p>Your comment has been noted. These alternatives were not selected as the project to be built.</p>
8	<p>3.11.5.1.1: Construction scenario 4</p> <p>“Partial closure of the intersection at Fautleroy Way Southwest and Southwest Avalon Way. One approach lane and one departure lane were assumed at each leg of the intersection. (Construction activities would close one quadrant of the intersection at a time; this analysis assumes that a consistent amount of vehicular capacity would be maintained during each quadrant closure).”</p> <p>This partial closure of Fautleroy Way would impact the protected bike lanes on Avalon Way. Would cyclists still have a lane of their own in this scenario? This seems like a major impact that isn't mentioned in the Non-motorized Facilities sections.</p>	<p>As noted, Sound Transit will work with the City of Seattle to develop and implement a construction management plan to provide alternate facilities for non-motorized travel that, to the extent feasible, offer a similar level of protection and comfort to the temporarily closed facility.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
9	<p>We also have generalized concerns about the SODO stations that involve a car overpass. While the Lander St overpass will decrease interactions between people, vehicles and trains (and keep traffic moving) it also means that anyone traveling east-west or accessing the station will have to go up a fairly steep grade only to go down to get where they're going. Please try to add elevators on both ends of the overpass if the sidewalk will be barely ADA accessible.</p>	<p>As described in Section 3.7, Affected Environment and Impacts during Operation – Non-motorized Facilities, of the Final EIS, new facilities would meet Americans with Disabilities Act requirements as well as local and federal design standards, as appropriate.</p>

February 20, 2025

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Secretary Sean Duffy
US Department of Transportation
Federal Transit Administration
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Sound Transit West Seattle Light Rail project – Urgent request

Secretary Duffy,

The Sound Transit West Seattle Light Rail extension project is in the final stages of review by the Federal Transit Administration (FTA) for a Record of Decision. The project has very serious problems that are inconsistent with your recent Order regarding sound economic analysis. These problems merit your attention before that decision is handed down on February 28.

The West Seattle project is an early phase of what is called ST 3, the latest version of Sound Transit's program for Light Rail in the Puget Sound area with a current \$148 Billion program budget through 2046.

Sound Transit (ST) has been planning the West Seattle Extension for nearly 2 years and published a Final Environmental Impact Statement (FEIS) dated August 5, 2024. (<https://www.soundtransit.org/get-to-know-us/documents-reports/west-seattle-link-extension-final-environmental-impact-statement>) The FEIS was approved by Susan Fletcher, Regional Administrator, NEPA Responsible Official For Federal Transit Administration, Region 10.

Sound Transit expects the USDOT's FTA to issue a federal 'Record of Decision' (ROD) in early 2025. The West Seattle project, which is only four miles long, is currently estimated to cost \$6-7 Billion per the FEIS. Sound Transit has previously received very substantial FTA grant funding and anticipates billions of dollars in additional FTA grants for light rail projects going forward.

The West Seattle light rail proposal does not meet the minimum requirements of USDOT to receive federal funding per your recent Order published in The Hill on Feb. 3, 2025, titled ENSURING RELIANCE UPON SOUND ECONOMIC ANALYSIS IN DOT POLICIES, PROGRAMS AND ACTIVITIES. Specifically, the Order states in section 5.a:

"The Departments grantmaking, lending, policymaking and rulemaking activities shall be based on sound economic principles and analysis supported by rigorous cost-benefit requirements and data-driven decisions."...

The FEIS for the West Seattle Link Extension is explicit in identifying that:


1. No rigorous cost/benefit analysis has been completed based on USDOT's requirements.
2. No programmatic alternative analysis meeting USDOT's requirements has been completed.
3. The planning and analysis that have been conducted was based on pre-COVID data that is no longer valid.
4. The FEIS identified Significant Environmental Impacts which have not been mitigated (and could easily be avoided with alternative transit investments).
5. The forecast ridership is abysmal, especially given the existing bus system serving West Seattle, meaning that 'Net new transit ridership' is tiny.
6. The project will increase Greenhouse Gas Emissions (GHG) emissions due to the very large amount of energy used in construction (cement, steel, tunneling, earth-moving, etc.).
7. The 60 lost businesses, hundreds of homes removed, large swaths of trees cut, impacts on the Duwamish Waterway, and the multiyear construction impacts to the community are all significant environmental impacts that can be avoided.
8. Sound Transit projects have multi-billion-dollar cost increases that call into question the agency's ability to fully fund and construct projects as proposed. The agency is approaching its debt limit and it is possible that projects will need to be reduced in scope or delayed, or both.

In summary, the project has such serious substantive and procedural flaws that a ROD is not justified. A review of FTA files would reveal that Sound Transit has a long history of obtaining Federal grants based on unrealistic assumptions and half-baked plans that quickly turn into costly boondoggles. Much more thorough scrutiny is needed before FTA signs off on another very dubious project.

We sincerely request your office delay the ROD for this project until a realistic and comprehensive Alternatives Analysis and Cost Benefit Analysis have been completed and the Federal Transit Administration has had an opportunity to review updated project documents.

Time is of the essence. We understand that the ROD preparation process is underway in preparation for release within weeks.

Thank you.



Todd Myers
Vice President for Research

Attachment: <https://www.washingtonpolicy.org/publications/detail/the-west-seattle-link-extension-has-gone-off-the-rails>

Cc: Executive Director Matthew Welbes
Associate Administrator for Planning and Environment Mark Ferroni

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The West Seattle light rail proposal does not meet the minimum requirements of USDOT to receive federal funding per your recent Order published on The Hill on Feb. 3, 2025, titled ENSURING RELIANCE UPON SOUND ECONOMIC ANALYSIS IN DOT POLICIES, PROGRAMS AND ACTIVITIES. Specifically, the Order states in section 5.a:</p> <p>“The Departments grantmaking, lending, policymaking and rulemaking activities shall be based on sound economic principles and analysis supported by rigorous cost-benefit requirements and data-driven decisions.”...</p> <p>The FEIS for the West Seattle Link Extension is explicit in identifying that:</p> <ol style="list-style-type: none"> 1. No rigorous cost/benefit analysis has been completed based on USDOT’s requirements. 2. No programmatic alternative analysis meeting USDOT’s requirements has been completed. 3. The planning and analysis that have been conducted was based on pre-COVID data that is no longer valid. 4. The FEIS identified Significant Environmental Impacts which have not been mitigated (and could easily be avoided with alternative transit investments). 5. The forecast ridership is abysmal, especially given the existing bus system serving West Seattle, meaning that ‘Net new transit ridership’ is tiny. 6. The project will increase Greenhouse Gas Emissions (GHG) emissions due to the very large amount of energy used in construction (cement, steel, tunneling, earth-moving, etc.). 7. The 60 lost businesses, hundreds of homes removed, large swaths of trees cut, impacts on the Duwamish Waterway, and the multiyear construction impacts to the community 	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>Neither the National Environmental Policy Act nor the State Environmental Policy Act, which the Final EIS was prepared pursuant to, require a cost/benefit analysis.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension.</p> <p>See Chapter 2, Alternatives Considered, of the Final EIS for a discussion of the alternatives analysis process completed for the project.</p> <p>See Chapter 3, Transportation Environment and Consequences, of the Final EIS for information on the ridership analysis.</p> <p>FTA and Sound Transit acknowledge the current impacts of the recent social response to the (COVID-19) pandemic and the resulting decline in travel demand that began in March 2020. At this time, it is impossible to predict future changes to the project purpose and need, schedule, and impacts that may result from a COVID-19 response of an unpredictable nature and length. Should substantial changes in the planning assumptions, project schedule, project scope, or surrounding project environment result because of a prolonged COVID-19 response, FTA and Sound Transit will consider additional project evaluation and public input consistent with NEPA and SEPA.</p> <p>Puget Sound Regional Council also acknowledges the pandemic in VISION 2050 (Puget Sound Regional Council 2020, page 124), stating:</p> <p>Over the last decade, transit ridership has experienced robust growth, with the central Puget Sound region being one of only four regions across the county with consistent growth in transit boardings. While COVID-19 has caused sudden and dramatic drops in transit ridership and revenue and has perhaps accelerated the acceptance of remote work</p>

Appendix C. Comments Received on the Final EIS and Responses

	<p>are all significant environmental impacts that can be avoided.</p> <p>8. Sound Transit projects have multi-billion-dollar cost increases that call into question the agency's ability to fully fund and construct projects as proposed. The agency is approaching its debt limit and it is possible that projects will need to be reduced in scope or delayed, or both.</p>	<p>environments, transit will continue to be a critical element for mobility as the region grows over the next 30 years.</p> <p>The region's historic investment in transit, and continued investments across modes, are critical due to the increases in congestion and travel delay seen in the region over the past decade. Since 2010, the region has grown by over 440,000 residents and 381,000 jobs. Prior to the COVID-19 pandemic, delay on the region's freeway corridors had increased more than 50 percent since 2014, and the average travel time to work had continued to steadily increase across all modes, averaging around 30 minutes. Notably, the share of commuters with travel times over 60 minutes increased steeply and was higher than the share of commuters with travel times less than 10 minutes.</p> <p>Puget Sound Regional Council's <i>Regional Transportation Plan 2022 – 2050</i> (Puget Sound Regional Council 2022) also acknowledges the pandemic's effect on ridership along with the continuing need to serve growth:</p> <p>The COVID-19 pandemic will continue to have near-term impacts on regular transit boardings. However, jurisdictions and transit agencies in the region are continuing to plan for growth in a way that will increase ridership and meet long-term projections of transit boardings.</p> <p>Consistent with the State Environmental Protection Act (SEPA), the West Seattle Link Extension Final Environmental Impact Statement (EIS) provides the public and decision makers with information about the West Seattle Link Extension "at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified" (Washington Administrative Code [WAC] 197-11-055(2)). This is also consistent with the National Environmental Policy Act (NEPA), which directs agencies to integrate NEPA with other planning early in the process to ensure that planning and decisions consider environmental values and to minimize delays. The EIS has been prepared using approximately 10 to 15 percent level of design. This level of design allows for</p>
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Appendix C. Comments Received on the Final EIS and Responses

		<p>meaningful evaluation of alternatives, impacts, and potential mitigation measures.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>
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Appendix C- Individuals- Form Letter Comments

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Appendix C. Comments Received on the Final EIS and Responses

Letter:

There's a clear winner: WSJ-6 "No Avalon Station Tunnel Alternative" listed on page 26 of the Sept-24 Executive Summary. Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative." My editorial comment underlined.

- WSJ-6 "No Avalon Station Tunnel" costs less \$1.4-1.50 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion. This design is less likely to experience cost overruns due to litigation and construction delays.
- Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge. Tunnel under Avalon Blvd on the East side of Yancy reduces SFH & Roadway impacts.
- Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative. The BofA Space should be turned into a transit hub for bus train transfers, the property is under utilized currently.
- Two station design complicates the bus/train transition. Better to create a centralized bus/train transfer at the Junction station.
- Improved Trip times to SoDO and downtown. Quickened trip times will drive ridership, the Avalon Station .25/miles from the Junction station.
- 10 Residential displacements and the cost of property acquisition on 32nd Ave are eliminated.
- ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for WSEA. If the Avalon station build proceeds WSE will suffer years of roadway impacts and taxpayers will pay more for a system that could have been built more economically and quickly.

Comment Response:

#	Comments	Responses
1	<p>There's a clear winner: WSJ-6 "No Avalon Station Tunnel Alternative" listed on page 26 of the Sept-24 Executive Summary.</p> <p>Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative." My editorial comment underlined.</p> <ul style="list-style-type: none"> • WSJ-6 "No Avalon Station Tunnel" costs less \$1.4-1.50 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion. This design is less likely to experience cost overruns due to litigation and construction delays. • Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge. Tunnel under Avalon Blvd on the East side of Yancy reduces SFH & Roadway impacts. • Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative. The BofA Space should be turned into a transit hub for bus train transfers, the property is under utilized currently. • Two station design complicates the bus/train transition. Better to create a centralized bus/train transfer at the Junction station. • Improved Trip times to SoDO and downtown. Quickened trip times will drive ridership, the Avalon Station .25/miles from the Junction station. • 10 Residential displacements and the cost of property acquisition on 32nd Ave are eliminated. • ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy. <p>In closing, WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for WSEA. If the Avalon station build proceeds WSE will suffer years of roadway impacts and taxpayers will pay more for a system that could have been built more economically and quickly.</p>	<p>Your support for Alternative WSJ-6 has been noted.</p> <p>Sound Transit has adjusted alternatives during conceptual design to avoid or minimize impacts, including property acquisitions, to the extent possible. Refinement of project design will continue throughout final design. Tunnel portal locations are dependent on existing slopes, track curvature, and track grade requirements.</p>

Appendix C. Comments Received on the Final EIS and Responses

List of Commenters:

Communication ID	Name	Email
555005	Gary Reifel	garyreifel@gmail.com
555064	Ryan Hink	ryan.hink@gmail.com
555065	Mary Ellen Cunningham	mecseattle@gmail.com
555078	Steven Zsitvay	steevzee@comcast.net
555142	Chad Hembrow	chadhembrow@comcast.net
555143	Myra Ferriols	mferriols@gmail.com
555288	Heidi Shining-Forrer	hvnnonastik@comcast.net
555289	Mark Forrer	mforrer@comcast.net
555292	Lauren Frey	lauren_frey@ajg.com
555326	Marcia Kato	None provided
555327	Paul Haury	None provided
555328	Robert McCall	None provided
555330	Mary Heinze	None provided
555332	Mary Ellen Cunningham	None provided
555333	Leah Hammack	None provided
555334	Joyce Aoyama	jtaoyama@aol.com
555336	Steven Zsitvay	None provided
555341	Lucy Barefoot	None provided
555350	Paul Haury	None provided

From: Gary Reifel <gary.reifel@gmail.com>

Sent: Saturday, October 5, 2024 10:16 AM

To: Swift, Lauren <lauren.swift@soundtransit.org>

Subject: Re: Notice of Availability - West Seattle Link Extension Final Environmental Impact Statement and Draft Programmatic Agreement- Invitation to Comment

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CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Hi Lauren,

I write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winner: WSJ-6 "No Avalon Station Tunnel Alternative"** listed on page 26 of the Sept-24 Executive Summary.

Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative." My editorial comment underlined.

- WSJ-6 "No Avalon Station Tunnel" **costs less** \$1.4-1.50 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion. *This design is less likely to experience cost overruns due to litigation and construction delays.*
- Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge. *Tunnel under Avalon Blvd on the East side of Yancy reduces SFH & Roadway impacts.*
- Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative. *The BofA Space should be turned into a transit hub for bus train transfers, the property is under utilized currently.*
- Two station design complicates the bus/train transition. Better to create a centralized bus/train transfer at the Junction station.
- Improved Trip times to SoDO and downtown. *Quickened trip times will drive ridership, the Avalon Station .25/miles from the Junction station.*
- 10 Residential displacements and the cost of property acquisition on 32nd Ave are eliminated.
- ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for WSEA. If the Avalon station build proceeds WSE will suffer years of roadway impacts and taxpayers will pay more for a system that could have been built more economically and quickly.

Thank you,

Gary Reifel - a 20+ year resident of West Seattle
206-601-1051

From: Ryan Hink <ryan.hink@gmail.com>

Sent: Tuesday, October 8, 2024 9:58 PM

To: Meeting Comments <MeetingComments@soundtransit.org>; carlasrogers@gmail.com; kcexec@kingcounty.gov; Swift, Lauren <lauren.swift@soundtransit.org>; rob.saka@seattle.gov; Harrell, Bruce <Bruce.Harrell@Seattle.gov>

Subject: Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy Noth Side & East of SW. Avalon Way

Some people who received this message don't often get email from ryan.hink@gmail.com. [Learn why this is important](#)

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Hello, Dow Constantine, Carla Rogers, Lauren Swift, Rob Saka, and Bruce Harrell,

I write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winning route:**

- **The WSJ-6 "No Avalon Station Tunnel Alternative"** listed on Figure Table ES-4 of the Sept-24 Executive Summary,
- With the ***Tunnel Entrance*** (noted on in the "**Lower Height No Avalon Station Tunnel Connection Alternative DEL-7**," listed on Figure ES-23,) ***moved 500 to 700 feet East for an entrance on the east side of SW Avalon Way/Northside of SW Yancey St.***

Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative."

My editorial comments found in the sub bullets.

- WSJ-6 "No Avalon Station Tunnel" **costs less** \$1.4-1.5 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion.
 - This design is less likely to experience cost overruns due to litigation and construction delays.

- Preserves the West Seattle neighborhood between SW. Avalon Way to the Bank of America parking lot.
- Avoids creating a pedestrian risk of a geographically redundant station located at the entrance to the West Seattle Bridge.
- Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge.
- Removes 22 residential acquisitions and displacements and the cost of property acquisition for South section of 32nd Ave SW.
- DEL-7 to WSJ-6 connection, *with tunnel entrance moved to the east side of SW Avalon Way & SW Yancey St.*
 - **2 less intersections impacted**, 1, SW Andover St. and 32nd Ave. SW, and 2, SW. Avalon Way and SW Andover St./SW Yancey Street
 - Adds approximately 80 feet of depth of ground buffer for reducing the vibration disturbance impacting the W. Seattle Bridge Freeway
 - And vibration and sound for the residents of SW. Avalon Way, 32nd Ave. SW., Fauntleroy Way SW, 33rd and 34th Ave. SW.
 - Offers a lower height for elevated track leaving the Delridge station (**reduced elevated construction engineering and material costs**).
 - Avoids closing primary egress/ingress and economic impacts cutting hardships on businesses and neighborhoods during construction, SW. Avalon Way.
 - Removes 10 Residential displacements + 1 Condominium Building and the cost of property acquisition for North section of 32nd Ave SW.
- Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative.
 - The B of A space should be turned into a transit hub for bus train transfers, the property is underutilized currently.
 - Better to create a centralized bus/train transfer at the Junction station instead of increasing a pedestrian injury and traffic accident risk by locating a transit station near the West Seattle Bridge entrance.
 - Quickened trip times (less the Avalon Station .39 miles from the Junction station) times to SoDo & Downtown will help drive ridership.
- ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSEA will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you,

Ryan Hink, 8 year resident of West Seattle

Seattle, Washington

206-724-1169

From: Mary Ellen Cunningham <mecseattle@gmail.com>

Sent: Tuesday, October 8, 2024 9:15 PM

To: Swift, Lauren <lauren.swift@soundtransit.org>

Subject: Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy North Side & East of SW. Avalon Way

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Hello Lauren Swift.

I write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winning route:**

- **The WSJ-6 "No Avalon Station Tunnel Alternative"** listed on Figure Table ES-4 of the Sept-24 Executive Summary,
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Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative."

My editorial comments found in the sub bullets.

- WSJ-6 "No Avalon Station Tunnel" ***costs less*** \$1.4-1.5 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion.
 - This design is less likely to experience cost overruns due to litigation and construction delays.

- Preserves the West Seattle neighborhood between SW. Avalon Way to the Bank of America parking lot.
 - Avoids creating a pedestrian risk of a geographically redundant station located at the entrance to the West Seattle Bridge.
 - Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge.
 - Removes 22 residential acquisitions and displacements and the cost of property acquisition for South section of 32nd Ave SW.
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 - **2 less intersections impacted**, 1, SW Andover St. and 32nd Ave. SW, and 2, SW. Avalon Way and SW Andover St./SW Yancey Street
 - Adds approximately 80 feet of depth of ground buffer for reducing the vibration disturbance impacting the W. Seattle Bridge Freeway
 - And vibration and sound for the residents of SW. Avalon Way, 32nd Ave. SW., Fauntleroy Way SW, 33rd and 34th Ave. SW.
 - Offers a lower height for elevated track leaving the Delridge station (**reduced elevated construction engineering and material costs**).
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 - Removes 10 Residential displacements + 1 Condominium Building and the cost of property acquisition for North section of 32nd Ave SW.
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 - Quickened trip times (less the Avalon Station .39 miles from the Junction station) times to SoDo & Downtown will help drive ridership.
- ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you,

Mary Ellen Cunningham, 25 year resident of West Seattle

206.406.3159

Mary Ellen Cunningham
206.406.3159

From: Steven Zsitvay <steevzee@comcast.net>

Sent: Wednesday, October 9, 2024 3:36 PM

To: Swift, Lauren <lauren.swift@soundtransit.org>

Subject: Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy Noth Side & East of SW. Avalon Way"

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Good Afternoon Ms. Swift,

I write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winning route:**

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My editorial comments found in the sub bullets.

- WSJ-6 "No Avalon Station Tunnel" ***costs less*** \$1.4-1.5 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion.
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 - Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge.
 - Removes 22 residential acquisitions and displacements and the cost of property acquisition for South section of 32nd Ave SW.
- DEL-7 to WSJ-6 connection, *with tunnel entrance moved to the east side of SW Avalon Way & SW Yancey St.*
 - ***2 less intersections impacted***, 1, SW Andover St. and 32nd Ave. SW, and 2, SW. Avalon Way and SW Andover St./SW Yancey Street

- Adds approximately 80 feet of depth of ground buffer for reducing the vibration disturbance impacting the W. Seattle Bridge Freeway
 - And vibration and sound for the residents of SW. Avalon Way, 32nd Ave. SW., Fauntleroy Way SW, 33rd and 34th Ave. SW.
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 - The B of A space should be turned into a transit hub for bus train transfers, the property is underutilized currently.
 - Better to create a centralized bus/train transfer at the Junction station instead of increasing a pedestrian injury and traffic accident risk by locating a transit station near the West Seattle Bridge entrance.
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 - ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you for your attention,

Steven Zsitvay

30 year resident of West Seattle

steevzee@comcast.net

(206) 930-6919

Subject	Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy Noth Side & East of SW. Avalon Way.
From	chad.hembrow@comcast.net
To	Meeting Comments; carlasrogers@gmail.com ; kcexec@kingcounty.gov ; Swift, Lauren; rob.saka@seattle.gov ; Harrell, Bruce
Sent	Thursday, October 10, 2024 10:56 AM

Hello, Dow Constantine, Carla Rogers, Lauren Swift, Rob Saka, and Bruce Harrell,

I write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winning route:**

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Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative."

My editorial comments found in the sub bullets.

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 - Removes 22 residential acquisitions and displacements and the cost of property acquisition for South section of 32nd Ave SW.
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 - Adds approximately 80 feet of depth of ground buffer for reducing the vibration disturbance impacting the W. Seattle Bridge Freeway

- And vibration and sound for the residents of SW. Avalon Way, 32nd Ave. SW., Fauntleroy Way SW, 33rd and 34th Ave. SW.
 - Offers a lower height for elevated track leaving the Delridge station (**reduced elevated construction engineering and material costs**).
 - Avoids closing primary egress/ingress and economic impacts cutting hardships on businesses and neighborhoods during construction, SW. Avalon Way.
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 - ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you,

Chad Hembrow, 15 year resident of West Seattle

Seattle, Washington

206.919.1821

From: Myra Ferriols <myferriols@gmail.com>

Sent: Thursday, October 10, 2024 11:43 AM

To: Meeting Comments <MeetingComments@soundtransit.org>; carlasrogers@gmail.com; kcexec@kingcounty.gov; Swift, Lauren <lauren.swift@soundtransit.org>; rob.saka@seattle.gov; Harrell, Bruce <Bruce.Harrell@Seattle.gov>

Cc: Myra Ferriols <myferriols@gmail.com>; Vince Ferriols <v.ferriols@yahoo.com>

Subject: Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy Noth Side & East of SW. Avalon Way.

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If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you,
 Myra (daughter) and Vince (Father) Ferriols, 76 year resident of West Seattle
 Seattle, Washington (on our property)

Thank you,

Myra
206-818-8746

From: Heidi Shininger-Forrer <hvnnonastik@comcast.net>

Sent: Thursday, October 10, 2024 6:41 PM

To: Meeting Comments <MeetingComments@soundtransit.org>; carlasrogers@gmail.com; kcexec@kingcounty.gov; Swift, Lauren <lauren.swift@soundtransit.org>; rob.saka@seattle.gov; Harrell, Bruce <Bruce.Harrell@Seattle.gov>

Cc: heidi Shininger-Forrer <hvnnonastik@comcast.net>; Mark FORRER <mforrer@comcast.net>

Subject: Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy North Side & East of SW. Avalon Way.

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Hello, Dow Constantine, Carla Rogers, Lauren Swift, Rob Saka, and Bruce Harrell,

I am writing today to advocate for the good of the environment, West Seattle, my neighborhood and neighbors, and to encourage you to consider an improved option for the final route for the West Seattle Link.

That option is: WSJ-6 "No Avalon Station w/Del-7 Tunnel Entrance at SW Yancy North Side & East of SW Avalon Way.

Dropping the Avalon Station, and moving the tunnel entrance East of (below) Avalon will preserve most of our neighborhood and lowers the number of neighboring businesses that would be displaced. There will be less environmental impact and disruption to daily life in our beloved West Seattle neighborhood. This option reduces the amount of track and height of the track above ground. Additionally, this option will lessen the disruption of the construction process. Though my first choice for many valid reasons is still the "No Build Option", this option to drop the Avalon Station, still gets light rail to West Seattle, and helps preserve the character of the neighborhood. The elimination of the Avalon Station is less expensive than the preferred route. A major concern on a project that has ballooned to an astronomical cost, which could still grow.

Please consider the over all negative environmental impact, and future generations who will have to live with this decision, and shoulder the financial burden.

Additionally, please consider reading this article, and watching this video link on the case for a "NO Build Option" which is still on the table.

Washington Policy Center-

West Seattle Link Extension has gone off the Rails:

<https://www.washingtonpolicy.org/publications/detail/the-west-seattle-link-extension-has-gone-off-the-rails?>

10 Reasons to not build West Seattle Light Rail:

<https://www.youtube.com/watch?v=OoKod7Np8Xk>

Below are many valid, carefully and thoughtfully compiled points put together by my neighbors, who's lives will be directly impacted by this decision.

We write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winning route:**

- The WSJ-6 “No Avalon Station Tunnel Alternative” listed on Figure Table ES-4 of the Sept-24 Executive Summary,
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- WSJ-6 “No Avalon Station Tunnel” ***costs less*** \$1.4-1.5 billion vs. the ‘preferred alternative’ \$1.75 - 1.9 billion.
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 - Avoids closing primary egress/ingress and economic impacts cutting hardships on businesses and neighborhoods during construction, SW. Avalon Way.
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- Better to create a centralized bus/train transfer at the Junction station instead of increasing a pedestrian injury and traffic accident risk by locating a transit station near the West Seattle Bridge entrance.
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-
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Thank you,

Heidi Shininger-Forrer, 20 year resident of West Seattle

Seattle, Washington

206-484-6802

From: MARK FORRER <mforrer@comcast.net>

Sent: Thursday, October 10, 2024 9:06:11 PM

To: Meeting Comments <MeetingComments@soundtransit.org>; carlasrogers@gmail.com <carlasrogers@gmail.com>; kcexec@kingcounty.gov <kcexec@kingcounty.gov>; Swift, Lauren <lauren.swift@soundtransit.org>; rob.saka@seattle.gov <rob.saka@seattle.gov>; Harrell, Bruce <Bruce.Harrell@Seattle.gov>; MARK FORRER <mforrer@comcast.net>

Subject: Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy North Side & East of SW. Avalon Way.

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Yo,
Dow Constantine, Carla Rogers, Lauren Swift, Rob Saka, and Bruce Harrell,

What the heck is wrong with you? You know this whole thing is a bad idea... Ridiculous cost for 4 miles??? So why are you pushing it through? It isn't going to help anybody in West Seattle. You are going to destroy a bunch of businesses and the Alaskan Junction. You are not going to improve anything in regards to West Seattle life or improve ridership. Save money, environment, homes and businesses and not do this.

I am writing today to advocate for the good of the environment, West Seattle, my neighborhood and neighbors, and to encourage you to consider an improved option for the final route for the West Seattle Link.

That option is: WSJ-6 "No Avalon Station w/Del-7 Tunnel Entrance at SW Yancy North Side & East of SW Avalon Way.

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- With the ***Tunnel Entrance*** (noted on in the “**Lower Height No Avalon Station Tunnel Connection Alternative DEL-7,**” listed on Figure ES-23,) ***moved 500 to 700 feet East for an entrance on the east side of SW Avalon Way/Northside of SW Yancey St.***

Here’s why this design is a considerable improvement over WSJ-5b the “preferred medium tunnel alternative.”

My editorial comments found in the sub bullets.

- WSJ-6 “No Avalon Station Tunnel” ***costs less*** \$1.4-1.5 billion vs. the ‘preferred alternative’ \$1.75 - 1.9 billion.
 - This design is less likely to experience cost overruns due to litigation and construction delays.
 - Preserves the West Seattle neighborhood between SW. Avalon Way to the Bank of America parking lot.
 - Avoids creating a pedestrian risk of a geographically redundant station located at the entrance to the West Seattle Bridge.
 - Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge.
 - Removes 22 residential acquisitions and displacements and the cost of property acquisition for South section of 32nd Ave SW.
- DEL-7 to WSJ-6 connection, *with tunnel entrance moved to the east side of SW Avalon Way & SW Yancey St.*
 - ***2 less intersections impacted***, 1, SW Andover St. and 32nd Ave. SW, and 2, SW. Avalon Way and SW Andover St./SW Yancey Street
 - Adds approximately 80 feet of depth of ground buffer for reducing the vibration disturbance impacting the W. Seattle Bridge Freeway
 - And vibration and sound for the residents of SW. Avalon Way, 32nd Ave. SW., Fauntleroy Way SW, 33rd and 34th Ave. SW.
 - Offers a lower height for elevated track leaving the Delridge station (***reduced elevated construction engineering and material costs***).
 - Avoids closing primary egress/ingress and economic impacts cutting hardships on businesses and neighborhoods during construction, SW. Avalon Way.
 - Removes 10 Residential displacements + 1 Condominium Building and the cost of property acquisition for North section of 32nd Ave SW.
- Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative.
 - The Bank of America space should be turned into a transit hub for bus train transfers, the property is underutilized currently.

- Better to create a centralized bus/train transfer at the Junction station instead of increasing a pedestrian injury and traffic accident risk by locating a transit station near the West Seattle Bridge entrance.
 - Quickened trip times (less the Avalon Station .39 miles from the Junction station) times to SoDo & Downtown will help drive ridership.
-
- ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you,

Mark Forrer

Seattle, Washington

206-484-6804

From: Lauren Frey <Lauren_Frey@ajg.com>

Sent: Friday, October 11, 2024 8:33:11 AM

To: Meeting Comments <MeetingComments@soundtransit.org>; carlasrogers@gmail.com <carlasrogers@gmail.com>; kcexec@kingcounty.gov <kcexec@kingcounty.gov>; Swift, Lauren <lauren.swift@soundtransit.org>; rob.saka@seattle.gov <rob.saka@seattle.gov>; Harrell, Bruce <Bruce.Harrell@Seattle.gov>

Subject: Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy Noth Side & East of SW. Avalon Way.

Some people who received this message don't often get email from lauren_frey@ajg.com. [Learn why this is important](#)

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Hello, Dow Constantine, Carla Rogers, Lauren Swift, Rob Saka, and Bruce Harrell,

I write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winning route:**

- **The WSJ-6 "No Avalon Station Tunnel Alternative"** listed on Figure Table ES-4 of the Sept-24 Executive Summary,
- With the ***Tunnel Entrance*** (noted on in the "**Lower Height No Avalon Station Tunnel Connection Alternative DEL-7**," listed on Figure ES-23,) ***moved 500 to 700 feet East for an entrance on the east side of SW Avalon Way/Northside of SW Yancey St.***

Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative."

My editorial comments found in the sub bullets.

- WSJ-6 "No Avalon Station Tunnel" **costs less** \$1.4-1.5 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion.
 - This design is less likely to experience cost overruns due to litigation and construction delays.
 - Preserves the West Seattle neighborhood between SW. Avalon Way to the Bank of America parking lot.
 - Avoids creating a pedestrian risk of a geographically redundant station located at the entrance to the West Seattle Bridge.
 - Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge.
 - Removes 22 residential acquisitions and displacements and the cost of property acquisition for South section of 32nd Ave SW.
- DEL-7 to WSJ-6 connection, *with tunnel entrance moved to the east side of SW Avalon Way & SW Yancey St.*
 - **2 less intersections impacted**, 1, SW Andover St. and 32nd Ave. SW, and 2, SW. Avalon Way and SW Andover St./SW Yancey Street
 - Adds approximately 80 feet of depth of ground buffer for reducing the vibration disturbance impacting the W. Seattle Bridge Freeway
 - And vibration and sound for the residents of SW. Avalon Way, 32nd Ave. SW., Fauntleroy Way SW, 33rd and 34th Ave. SW.
 - Offers a lower height for elevated track leaving the Delridge station (**reduced elevated construction engineering and material costs**).
 - Avoids closing primary egress/ingress and economic impacts cutting hardships on businesses and neighborhoods during construction, SW. Avalon Way.

- Removes 10 Residential displacements + 1 Condominium Building and the cost of property acquisition for North section of 32nd Ave SW.
- Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative.
 - The B of A space should be turned into a transit hub for bus train transfers, the property is underutilized currently.
 - Better to create a centralized bus/train transfer at the Junction station instead of increasing a pedestrian injury and traffic accident risk by locating a transit station near the West Seattle Bridge entrance.
 - Quickened trip times (less the Avalon Station .39 miles from the Junction station) times to SoDo & Downtown will help drive ridership.
- ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you,
 Lauren Frey, 20 year resident of West Seattle
 Seattle, Washington

Lauren Frey
Claims Consultant, Marine
 CA License No. 0D82224



Insurance | Risk Management | Consulting

Gallagher 2825 Eastlake Ave E, Suite 110, Seattle, WA 98102
 D: (206) 607 0958 | M: (206) 914 6835
lauren_frey@ajg.com | AJG.com

Arthur J. Gallagher Risk Management Services, LLC.
 CA License No. 0D69293
 Arthur J. Gallagher & Co. Insurance Brokers of California, Inc.
 CA License No. 0726293

Subject	West Seattle Extension: WSJ-6
From	Markat Kato
To	Meeting Comments
Sent	Monday, October 7, 2024 1:52 PM

Dear ST Board Members,

I write to advocate for the West Seattle rail design that's best for West Seattle. Of the designs proposed there's a clear winner: **WSJ-6 "No Avalon Station Tunnel Alternative"**

This design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative" for many reasons, all outlined on pg. 26 of the West SEA Executive Summary published in September.

- **WSJ-6 design costs less:** \$1.4-1.50 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion. *This design is also less likely to experience cost overruns due to litigation and construction delays. Keep it simple and do what's right for Seattle's Taxpayers at large, this design does that.*
- **Zero intersection or roadway impacts vs. 2+ years of construction/roadway Bridge disruption.** *Tunneling under Avalon Blvd on the East side of Yancy will dramatically reduce SFH & roadway impacts.*
- **Projected ridership is roughly equal 7,500 vs 7,600.** *The BofA building and parking lot should be turned into a transit hub for bus train transfers, this will increase ridership. Again keep bus/train transfers simple at one station.*
- **The two station design complicates the bus/train transitions.** *A centralized bus/train transfer at the Junction station is best; consider the BofA property and parking lot for a transit center central to shopping.*
- **Single station design quickens trips to SoDO and downtown by 5 minutes or more.** *Quicker trips will drive ridership. Note the Avalon and Junction stations are separated by a quarter mile, building both makes no sense.*
- **10 Residential displacements will be eliminated.** *Reduces build cost and property acquisitions, the Avalon station will be a costly misstep if kept.*
- **38 fewer business displacements** one of which includes portions of Transitional Housing's facilities at the intersection of Avalon Blvd. and SW Yancy St.

In closing, the WSJ-6 design which eliminates the Avalon station and tunnels to a single Junction station is the best design. West Seattle residents will suffer years of roadway impacts, and taxpayers will pay more for a system that could have been built more economically and swiftly without the Avalon Station.

Thank you,
Marcia Kato
WS resident

Subject	Arguments for WSJ-6 "No Avalon Station w/ Tunnel Entrance at SW Yancy Noth Side & East of SW. Avalon Way.
From	Paul Haury
To	Meeting Comments; carlasrogers@gmail.com ; kcexec@kingcounty.gov ; Swift, Lauren; rob.saka@seattle.gov ; Harrell, Bruce
Cc	Paul Haury
Sent	Monday, October 7, 2024 8:20 PM

Hello, Dow Constantine, Carla Rogers, Lauren Swift, Rob Saka, and Bruce Harrell,

I write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winning route:**

- **The WSJ-6 "No Avalon Station Tunnel Alternative"** listed on Figure Table ES-4 of the Sept-24 Executive Summary,
- With the **Tunnel Entrance** (noted on in the "**Lower Height No Avalon Station Tunnel Connection Alternative DEL-7**," listed on Figure ES-23,) **moved 500 to 700 feet East for an entrance on the east side of SW Avalon Way/Northside of SW Yancey St.**

Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative."

My editorial comments found in the sub bullets.

- WSJ-6 "No Avalon Station Tunnel" **costs less** \$1.4-1.5 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion.
 - This design is less likely to experience cost overruns due to litigation and construction delays.
 - Preserves the West Seattle neighborhood between SW. Avalon Way to the Bank of America parking lot.
 - Avoids creating a pedestrian risk of a geographically redundant station located at the entrance to the West Seattle Bridge.
 - Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge.
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- DEL-7 to WSJ-6 connection, *with tunnel entrance moved to the east side of SW Avalon Way & SW Yancey St.*
 - **2 less intersections impacted**, 1, SW Andover St. and 32nd Ave. SW, and 2, SW. Avalon Way and SW Andover St./SW Yancey Street
 - Adds approximately 80 feet of depth of ground buffer for reducing the vibration disturbance impacting the W. Seattle Bridge Freeway
 - And vibration and sound for the residents of SW. Avalon Way, 32nd Ave. SW., Fauntleroy Way SW, 33rd and 34th Ave. SW.
 - Offers a lower height for elevated track leaving the Delridge station (**reduced elevated construction engineering and material costs**).
 - Avoids closing primary egress/ingress and economic impacts cutting hardships on businesses and neighborhoods during construction, SW. Avalon Way.
 - Removes 10 Residential displacements + 1 Condominium Building and the cost of property acquisition for Noth section of 32nd Ave SW.
- Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative.
 - The B of A space should be turned into a transit hub for bus train transfers, the property is underutilized currently.
 - Better to create a centralized bus/train transfer at the Junction station instead of increasing a pedestrian injury and traffic accident risk by locating a transit station near the West Seattle Bridge

entrance.

- Quickened trip times (less the Avalon Station .39 miles from the Junction station) times to SoDo & Downtown will help drive ridership.
- ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you,

Paul Haury, 22 year resident of West Seattle
Seattle, Washington
206-714-6113

Subject	Arguements for WSJ-6 "NO AVALON STATION, DEL-7 Tunnel Entrance @ SW Yancy North Side and East of SW Avalon Way
From	ROBERT MCCALL
To	Meeting Comments; kcexec@kingcounty.gov ; rob.saka@seattle.gov ; Swift, Lauren; joe.mcdermott@kingcounty.gov ; Harrell, Bruce
Cc	ROBERT MCCALL
Sent	Tuesday, October 8, 2024 9:40 AM

Hello Dow Constantine, Carla Rogers, Lauren Swift, Rob Saka, and Bruce Harrell,

As one of the many businesses and/or households greatly affected by this behemoth of a project, I write to advocate for a final West Seattle Link design that's better for West Seattle and the integrity of our great neighborhood. I live at 4105 32nd Ave SW where we built our home 18 years ago as our "forever" family home so we will, as will many, many others, be affected in no small way both physically and emotionally with this massively impactful project. While I'm no advocate of light rail to West Seattle, in light of the likely inevitability of it, I share with thousands of other folx that **there's a clear winning route:**

- **The WSJ-6 "No Avalon Station Tunnel Alternative"** listed on Figure Table ES-4 of the Sept-24 Executive Summary,
- With the ***Tunnel Entrance*** (noted on in the "**Lower Height No Avalon Station Tunnel Connection Alternative DEL-7,**" listed on Figure ES-23,) ***moved 500 to 700 feet East for an entrance on the east side of SW Avalon Way/Northside of SW Yancey St.***

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Editorial comments found in the sub bullets.

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 - ***2 less intersections impacted***, 1, SW Andover St. and 32nd Ave. SW, and 2, SW. Avalon Way and SW Andover St./SW Yancey Street
 - Adds approximately 80 feet of depth of ground buffer for reducing the vibration disturbance impacting the W. Seattle Bridge Freeway

- And vibration and sound for the residents of SW. Avalon Way, 32nd Ave. SW., Fauntleroy Way SW, 33rd and 34th Ave. SW.
 - Offers a lower height for elevated track leaving the Delridge station (**reduced elevated construction engineering and material costs**).
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 - ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

And very importantly the prospects of negatively impactful noise pollution, increased crime, unsightly impacts to the area, and other inevitable unintended nuisances should no question be considered and will no doubt be a lasting legacy of such a project.

Thank you,

Robert McCall
Chantelle McCall
Jacob McCall (16yrs old)
Olivia McCall (12yrs old)

20 year residents of West Seattle at
4105 32nd Ave SW
West Seattle, Washington

(206) 300-5210

Subject	Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy Noth Side & East of SW. Avalon Way.
From	MARY HEINZE
To	Meeting Comments; carlasrogers@gmail.com ; kcexec@kingcounty.gov ; Swift, Lauren; rob.saka@seattle.gov ; Harrell, Bruce
Sent	Tuesday, October 8, 2024 12:54 PM

Hello, Dow Constantine, Carla Rogers, Lauren Swift, Rob Saka, and Bruce Harrell,

I write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winning route:**

- **The WSJ-6 "No Avalon Station Tunnel Alternative"** listed on Figure Table ES-4 of the Sept-24 Executive Summary,
- With the ***Tunnel Entrance*** (noted on in the "**Lower Height No Avalon Station Tunnel Connection Alternative DEL-7,**" listed on Figure ES-23,) ***moved 500 to 700 feet East for an entrance on the east side of SW Avalon Way/Northside of SW Yancey St.***

Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative."

My editorial comments found in the sub bullets.

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 - Adds approximately 80 feet of depth of ground buffer for reducing the vibration disturbance impacting the W. Seattle Bridge Freeway
 - And vibration and sound for the residents of SW. Avalon Way, 32nd Ave. SW., Fauntleroy Way SW, 33rd and 34th Ave. SW.
 - Offers a lower height for elevated track leaving the Delridge station (**reduced elevated construction engineering and material costs**).

- Avoids closing primary egress/ingress and economic impacts cutting hardships on businesses and neighborhoods during construction, SW. Avalon Way.
- Removes 10 Residential displacements + 1 Condominium Building and the cost of property acquisition for North section of 32nd Ave SW.
- Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative.
 - The B of A space should be turned into a transit hub for bus train transfers, the property is underutilized currently.
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- ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you,

Mary Heinze, 40 year resident in current home, 73 resident of West Seattle
4017 32nd Ave SW
Seattle, Washington

206-697-8921

Subject	Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy North Side & East of SW. Avalon Way
From	Mary Ellen Cunningham
To	Meeting Comments
Sent	Tuesday, October 8, 2024 9:12 PM

Hello, Dow Constantine.

I write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winning route:**

- **The WSJ-6 "No Avalon Station Tunnel Alternative"** listed on Figure Table ES-4 of the Sept-24 Executive Summary,
- With the ***Tunnel Entrance*** (noted on in the "**Lower Height No Avalon Station Tunnel Connection Alternative DEL-7,**" listed on Figure ES-23,) ***moved 500 to 700 feet East for an entrance on the east side of SW Avalon Way/Northside of SW Yancey St.***

Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative."

My editorial comments found in the sub bullets.

- WSJ-6 "No Avalon Station Tunnel" **costs less** \$1.4-1.5 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion.
 - This design is less likely to experience cost overruns due to litigation and construction delays.
 - Preserves the West Seattle neighborhood between SW. Avalon Way to the Bank of America parking lot.
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 - And vibration and sound for the residents of SW. Avalon Way, 32nd Ave. SW., Fauntleroy Way SW, 33rd and 34th Ave. SW.

- Offers a lower height for elevated track leaving the Delridge station (***reduced elevated construction engineering and material costs***).
 - Avoids closing primary egress/ingress and economic impacts cutting hardships on businesses and neighborhoods during construction, SW. Avalon Way.
 - Removes 10 Residential displacements + 1 Condominium Building and the cost of property acquisition for Noth section of 32nd Ave SW.
- Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative.
 - The B of A space should be turned into a transit hub for bus train transfers, the property is underutilized currently.
 - Better to create a centralized bus/train transfer at the Junction station instead of increasing a pedestrian injury and traffic accident risk by locating a transit station near the West Seattle Bridge entrance.
 - Quickened trip times (less the Avalon Station .39 miles from the Junction station) times to SoDo & Downtown will help drive ridership.
 - ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you,

Mary Ellen Cunningham, 25 year resident of West Seattle

206.406.3159

Mary Ellen Cunningham

206.406.3159

Subject	Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy Noth Side & East of SW. Avalon Way.
From	Leah Hammack
To	Meeting Comments; carlasrogers@gmail.com ; kcexec@kingcounty.gov ; Swift, Lauren; rob.saka@seattle.gov ; Harrell, Bruce
Sent	Wednesday, October 9, 2024 10:29 AM

Hello, Dow Constantine, Carla Rogers, Lauren Swift, Rob Saka, and Bruce Harrell,

I write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winning route:**

- **The WSJ-6 "No Avalon Station Tunnel Alternative"** listed on Figure Table ES-4 of the Sept-24 Executive Summary,
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Here's why this design is a considerable improvement over WSJ-5b, the "preferred medium tunnel alternative."

Editorial comments found in the sub bullets.

- WSJ-6 "No Avalon Station Tunnel" **costs less** \$1.4-1.5 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion.
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 - Removes 22 residential acquisitions and displacements and the cost of property acquisition for the South section of 32nd Ave SW.
- DEL-7 to WSJ-6 connection, *with tunnel entrance moved to the east side of SW Avalon Way & SW Yancy St.*
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- Avoids closing primary egress/ingress and economic impacts cutting hardships on businesses and neighborhoods during construction, SW. Avalon Way.
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In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you,

Leah Hammack, 20 year resident of West Seattle

Seattle, Washington

206-979-0322

Subject	ST3 - Final line Design Should be WSJ-6
From	jtaoyama@aol.com
To	Meeting Comments
Sent	Wednesday, October 9, 2024 3:09 PM

Hello,

I write to advocate for the West Seattle rail design that's best for West Seattle. Of the designs proposed there's a clear winner: **WSJ-6 "No Avalon Station Tunnel Alternative"**

This design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative" for many reasons, all outlined on pg. 26 of the West SEA Executive Summary published in September.

- **WSJ-6 design costs less:** \$1.4-1.50 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion. *This design is also less likely to experience cost overruns due to litigation and construction delays. Keep it simple and do what's right for Seattle's Taxpayers at large, this design does that.*
- **Zero intersection or roadway impacts vs. 2+ years of construction/roadway Bridge disruption.** *Tunneling under Avalon Blvd on the East side of Yancy will dramatically reduce SFH & roadway impacts.*
- **Projected ridership is roughly equal 7,500 vs 7,600.** *The BofA building and parking lot should be turned into a transit hub for bus train transfers, this will increase ridership. Again keep bus/train transfers simple at one station.*
- **The two station design complicates the bus/train transitions.** *A centralized bus/train transfer at the Junction station is best; consider the BofA property and parking lot for a transit center central to shopping.*
- **Single station design quickens trips to SoDO and downtown by 5 minutes or more.** *Quicker trips will drive ridership. Note the Avalon and Junction stations are separated by a quarter mile, building both makes no sense.*
- **10 Residential displacements will be eliminated.** *Reduces build cost and property acquisitions, the Avalon station will be a costly misstep if kept.*
- **38 fewer business displacements** one of which includes portions of Transitional Housing's facilities at the intersection of Avalon Blvd. and SW Yancy St.

In closing, the WSJ-6 design which eliminates the Avalon station and tunnels to a single Junction station is the best design for WSEA. WSE will suffer years of roadway impacts and taxpayers will pay more for a system that could have been built more economically and swiftly without the Avalon Station. The stations seem too close to each other and will cause extra expense, congestion and parking issues.

Thank you,

Joyce Aoyama

Subject	Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy Noth Side & East of SW. Avalon Way.
From	Steven Zsitvay
To	Meeting Comments
Sent	Wednesday, October 9, 2024 3:19 PM

I write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winning route:**

- **The WSJ-6 "No Avalon Station Tunnel Alternative"** listed on Figure Table ES-4 of the Sept-24 Executive Summary,
- With the ***Tunnel Entrance*** (noted on in the "**Lower Height No Avalon Station Tunnel Connection Alternative DEL-7,**" listed on Figure ES-23,) ***moved 500 to 700 feet East for an entrance on the east side of SW Avalon Way/Northside of SW Yancey St.***

Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative."

My editorial comments found in the sub bullets.

- WSJ-6 "No Avalon Station Tunnel" ***costs less*** \$1.4-1.5 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion.
 - This design is less likely to experience cost overruns due to litigation and construction delays.
 - Preserves the West Seattle neighborhood between SW. Avalon Way to the Bank of America parking lot.
 - Avoids creating a pedestrian risk of a geographically redundant station located at the entrance to the West Seattle Bridge.
 - Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge.
 - Removes 22 residential acquisitions and displacements and the cost of property acquisition for South section of 32nd Ave SW.
- DEL-7 to WSJ-6 connection, *with tunnel entrance moved to the east side of SW Avalon Way & SW Yancey St.*
 - ***2 less intersections impacted***, 1, SW Andover St. and 32nd Ave. SW, and 2, SW. Avalon Way and SW Andover St./SW Yancey Street
 - Adds approximately 80 feet of depth of ground buffer for reducing the vibration disturbance impacting the W. Seattle Bridge Freeway
 - And vibration and sound for the residents of SW. Avalon Way, 32nd Ave. SW., Fauntleroy Way SW, 33rd and 34th Ave. SW.
 - Offers a lower height for elevated track leaving the Delridge station (***reduced elevated construction engineering and material costs***).
 - Avoids closing primary egress/ingress and economic impacts cutting hardships on businesses and neighborhoods during construction, SW. Avalon Way.
 - Removes 10 Residential displacements + 1 Condominium Building and the cost of property acquisition for Noth section of 32nd Ave SW.

- Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative.
 - The B of A space should be turned into a transit hub for bus train transfers, the property is underutilized currently.
 - Better to create a centralized bus/train transfer at the Junction station instead of increasing a pedestrian injury and traffic accident risk by locating a transit station near the West Seattle Bridge entrance.
 - Quickened trip times (less the Avalon Station .39 miles from the Junction station) times to SoDo & Downtown will help drive ridership.

- ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you for your attention,

Steven Zsitvay

30 year resident of West Seattle

steevzee@comcast.net

(206) 930-6919

Subject	12/8 Executive Committee Meeting Public Comment: Arguments for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance at SW Yancy North Side & East of SW. Avalon Way. Respecting Unceded Lands of the Duwamish People.
From	Luz Barefoot
To	Meeting Comments
Sent	Thursday, October 10, 2024 2:47 AM

Hello, board members in particular Dow Constantine, Carla Rogers, Lauren Swift, Rob Saka, and Bruce Harrell,

I am a 13 yr resident of the Unceded Lands of the Duwamish People here in West Seattle. I write to advocate for a final West Seattle Link design that's best for West Seattle. **There's a clear winning route:**

-

The WSJ-6 "No Avalon Station Tunnel Alternative" listed on Figure Table ES-4 of the Sept-24 Executive Summary,

-

With the

Tunnel Entrance

(noted on in the "**Lower Height No Avalon Station Tunnel Connection Alternative DEL-7,**" listed on Figure ES-23,)

moved 500 to 700 feet East for an entrance on the east side of SW Avalon Way/Northside of SW Yancey St.

Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative."

-

WSJ-6 "No Avalon Station Tunnel" **costs**

less \$1.4-1.5 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion.

-

This design is less likely to experience cost overruns due to litigation and construction delays.

-

Preserves the West Seattle neighborhood between SW. Avalon Way to the Bank of America parking lot.

-

Avoids creating a pedestrian risk of a geographically redundant station located at the entrance to the West Seattle Bridge.

-

Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fautleroy and the WSEA Bridge.

-

Removes 22 residential acquisitions and displacements and the cost of property acquisition for South section of 32nd Ave SW.

-

DEL-7 to WSJ-6 connection, *with*
tunnel entrance moved to the east side of SW Avalon Way & SW Yancey St.

-

2 less intersections impacted,

1, SW Andover St. and 32nd

Ave. SW, and 2, SW. Avalon Way and SW Andover St./SW Yancey Street

-

Adds approximately 80 feet of depth of ground buffer for reducing the vibration disturbance impacting the W. Seattle Bridge Freeway

-

And vibration and sound for the residents of SW. Avalon Way, 32nd

Ave. SW., Fauntleroy Way SW, 33rd

and 34th

Ave. SW.

-

Offers a lower height for elevated track leaving the Delridge station (**reduced elevated construction engineering and material costs**).

-

Avoids closing primary egress/ingress and economic impacts cutting hardships on businesses and neighborhoods during construction, SW. Avalon Way.

-

Removes 10 Residential displacements + 1 Condominium Building and the cost of property acquisition for North section of 32nd Ave SW.

-

Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative.

-

The Bank of America space should be turned into a transit hub for bus train transfers, the property is underutilized currently.

-

Better to create a centralized bus/train transfer at the Junction station instead of increasing a pedestrian injury and traffic accident risk by locating a transit station near the West Seattle Bridge entrance.

-

Quickened trip times (less the Avalon Station .39 miles from the Junction station) times to SoDo & Downtown will help drive ridership.

-

ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle.

If the Avalon station build proceeds WSE will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you,

Lucy Barefoot, 13 year resident of unceded lands of the Duwamish People in West Seattle

Seattle, Washington

770-870-9306

Subject	Public comment: System Expansion Committee Meeting 10-10-2024, Reasons for WSJ-6 "No Avalon Station w/ DEL-7 Tunnel Entrance moved East of SW Avalon Way
From	Paul Haury
To	Meeting Comments
Sent	Thursday, October 10, 2024 12:12 PM

Hello Sound Transit Committee,

I hope to build make it today for in person testimony. This submission serves as a written record, either in addition to, or in lieu of me not being able to arrive to testify in person.

I write to advocate for a final West Seattle Link design that's good for West Seattle. **There's a clear winning route:**

- **The WSJ-6 "No Avalon Station Tunnel Alternative"** listed on Figure Table ES-4 of the Sept-24 Executive Summary,
- With the **Tunnel Entrance** (noted on in the "**Lower Height No Avalon Station Tunnel Connection Alternative DEL-7**," listed on Figure ES-23,) **moved 500 to 700 feet East for an entrance on the east side of SW Avalon Way/Northside of SW Yancey St.**

Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative."

My editorial comments found in the sub bullets.

- WSJ-6 "No Avalon Station Tunnel" **costs less** \$1.4-1.5 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion.
 - This design is less likely to experience cost overruns due to litigation and construction delays.
 - Preserves the West Seattle neighborhood and businesses between SW. Avalon Way to the Bank of America parking lot.
 - Avoids creating a pedestrian risk of a geographically redundant station located at the entrance to the West Seattle Bridge.
 - Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge.
 - Removes 22 residential acquisitions and displacements and the cost of property acquisition for South section of 32nd Ave SW.
- DEL-7 to WSJ-6 connection, *with tunnel entrance moved to the east side of SW Avalon Way & SW Yancey St.*
 - **2 less intersections impacted**, 1, SW Andover St. and 32nd Ave. SW, and 2, SW. Avalon Way and SW Andover St./SW Yancey Street
 - Adds approximately 80 feet of depth of ground buffer for reducing the vibration disturbance impacting the W. Seattle Bridge Freeway
 - And vibration and sound for the residents of SW. Avalon Way, 32nd Ave. SW., Fauntleroy Way SW, 33rd and 34th Ave. SW.
 - Offers a lower height for elevated track leaving the Delridge station (**reduced elevated construction engineering and material costs**).
 - Avoids closing primary egress/ingress and economic impacts cutting hardships on businesses and neighborhoods during construction, SW. Avalon Way.
 - Removes 10 Residential displacements + 1 Condominium Building and the cost of property acquisition for North section of 32nd Ave SW.
- Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative.
 - The B of A space should be turned into a transit hub for bus train transfers, the property is underutilized currently.

- Better to create a centralized bus/train transfer at the Junction station instead of increasing a pedestrian injury and traffic accident risk by locating a transit station near the West Seattle Bridge entrance.
 - Quickened trip times (less the Avalon Station .39 miles from the Junction station) times to SoDo & Downtown will help drive ridership.
-
- ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, to available choice of DEL-7 w/ Tunnel Moved East of SW Avalon Way + WSJ-6 that eliminates the Avalon station, and tunnels to a single Junction station is the best design for West Seattle. It brings light rail in two W. Seattle with far less traffic and pedestrian safety impacts, and by Sound Transit projections looks like it's an easy \$500,000,000 less expensive.

If the Avalon station build proceeds West Seattle will suffer years of negative roadway and economic impacts, and taxpayers will pay more for a system that could have been built more economically and better for the people of West Seattle.

Thank you,

Paul Haury, 22 year resident of West Seattle
Seattle, Washington
206-714-6113

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Appendix C- Individuals- Substantive Comments

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Final EIS West Seattle Light Rail

From Baylee Frost <baylee.kline@gmail.com>

Date Fri 9/13/2024 5:50 PM

To West Seattle Link Extension <westseattlelink@soundtransit.org>

[You don't often get email from baylee.kline@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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To whom it may concern,

I have spent the last couple of days reviewing the documents put forth for the proposed plans for the rail link to West Seattle. I live in a neighborhood heavily impacted by all proposed plans and have several neighbors who have been actively trying to get us to join the growing chorus calling for a no build option. As a global citizen I have experienced the vastly superior rail systems in developed cities and have been looking forward to a more reliable mode of public transportation to get off the "island."

After reviewing the different routes for the Delridge segment/Avalon station I feel I must speak out against the preferred alternative. While I commend the efforts and understand the intent of saving transitional resources, I can't imagine it is worth the possibly 200 million in additional costs over the originally proposed DEL-6a. Surely it would be cheaper to build them a new and improved space. In light of the budget overages for this project, it doesn't seem like a fiscally responsible use of tax payer dollars to continue with the preferred route in light of this new information and I urge you to reconsider.

Additionally, I would like to advocate for keeping the Avalon station as this area is projected for a lot of growth and development and the hilly terrain in the area may very well deter riders from walking a mile to other stations. Thank you for your time and best of luck with the upcoming difficult decisions ahead.

Regards,

Baylee Frost

Sent from my iPhone

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>After reviewing the different routes for the Delridge segment/Avalon station I feel I must speak out against the preferred alternative. While I commend the efforts and understand the intent of saving transitional resources, I can't imagine it is worth the possibly 200 million in additional costs over the originally proposed DEL-6a. Surely it would be cheaper to build them a new and improved space. In light of the budget overages for this project, it doesn't seem like a fiscally responsible use of tax payer dollars to continue with the preferred route in light of this new information and I urge you to reconsider.</p>	<p>Your opposition to Preferred Option DEL-6b has been noted.</p>
2	<p>Additionally, I would like to advocate for keeping the Avalon station as this area is projected for a lot of growth and development and the hilly terrain in the area may very well deter riders from walking a mile to other stations.</p>	<p>Your support for the Avalon Station has been noted.</p>

Subject	West Seattle-Ballard light rail project
From	Brenda Howald
To	Email The Board
Sent	Wednesday, September 18, 2024 2:03 PM

You don't often get email from bjhowald@gmail.com. [Learn why this is important](#)

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Dear Board,

Dear Sound Transit Board members,

I live on 36th Ave. S.W. in West Seattle, very close to the intersection with Fauntleroy, just 2 blocks from the proposed Sound Transit light rail route that would go from the West Seattle Junction down Avalon., (then through Delridge and onto the West Seattle Bridge.) Our neighborhood has excellent bus connections to downtown Seattle and beyond through use of the C Line. We don't need light rail in this part of the city. Constructing the stations and tracks will bring marked noise to our neighborhood, and once the rail lines are up and operating, we can expect to hear the trains 24/7. It will erode our quality of life here greatly.

If you have money which must be spent in this neighborhood, add a few bus lines for a fraction of the cost of light rail. Please take the light rail project to another neighborhood that actually wants it.

Thank you,

Brenda Howald

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Constructing the stations and tracks will bring marked noise to our neighborhood, and once the rail lines are up and operating, we can expect to hear the trains 24/7. It will erode our quality of life here greatly.</p> <p>If you have money which must be spent in this neighborhood, add a few bus lines for a fraction of the cost of light rail. Please take the light rail project to another neighborhood that actually wants it.</p>	<p>The noise impacts of the project are described in Section 4.7, Noise and Vibration, and Appendix N.3, Noise and Vibration Technical Report, of the West Seattle Link Extension Final Environmental Impact Statement (EIS). Sound Transit is committed to minimizing project noise levels to below the Federal Transit Administration (FTA) impact criteria.</p> <p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>

Subject	Light rail
From	tagu4@comcast.net
To	Email The Board
Sent	Wednesday, September 18, 2024 11:11 AM

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Hello ST Board,

Rein in the spending. Admit when this is not a good idea to add light rail. Please rethink this light rail, especially to West Seattle with the new estimates. Add buses if needed to West Seattle. The cost to do all this is out of control and not even near finished so expect more.

Issaquah is so far out that I am angry having to pay for it without it being available anytime in the near future.

Jean Ann Aguirre

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Rein in the spending. Admit when this is not a good idea to add light rail. Please rethink this light rail, especially to West Seattle with the new estimates. Add buses if needed to West Seattle. The cost to do all this is out of control and not even near finished so expect more.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>

Subject	Agenda Item #7 - Reports to the Committee • Presentation on West Seattle Link Extension Final Environmental Impact Statement
From	jan.roberts
To	Meeting Comments
Sent	Wednesday, September 18, 2024 5:19 PM

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Light rail fails to serve “transit deserts” in our community where transit-dependent populations live and are underserved by mass transit. The current cost estimate for the West Seattle light rail link is over \$6 billion and rising for 4 miles of track from the Alaska Junction and only takes us SODO. The cost is obscene. The light rail extension will serve the parts of West Seattle that already have substantial access to mass transit. Alternatively, some of those funds be used to improve existing transit services on the West Seattle peninsula and serve areas in our community where transit-dependent populations live and are underserved by mass transit. It’s a win-win situation for everyone, and it can be achieved with little environmental impact and without people losing their businesses, homes, or jobs. However, these won’t be considered until the Sound Transit Board becomes directly elected. It’s past time for the overburdened taxpayers in the Regional Transit Authority’s taxing district to insist on better accountability from Sound Transit’s Board and bureaucracy. Perhaps it’s time for our State government to step in and fix this mess.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Light rail fails to serve “transit deserts” in our community where transit-dependent populations live and are underserved by mass transit. The current cost estimate for the West Seattle light rail link is over \$6 billion and rising for 4 miles of track from the Alaska Junction and only takes us SODO. The cost is obscene. The light rail extension will serve the parts of West Seattle that already have substantial access to mass transit. Alternatively, some of those funds be used to improve existing transit services on the West Seattle peninsula and serve areas in our community where transit-dependent populations live and are underserved by mass transit. It’s a win-win situation for everyone, and it can be achieved with little environmental impact and without people losing their businesses, homes, or jobs.</p>	<p>Transit riders headed to Downtown Seattle from south of the study area would transfer from bus transit to light rail. King County Metro Transit’s (Metro’s) RapidRide H Line would provide a transfer to light rail at the Delridge Station for residents in Highland Park and White Center, and residents in High Point would likely transfer from multiple Metro bus routes to light rail at the Avalon Station or Alaska Junction Station. Refer to Appendix G, Environmental Justice, for information on impacts and benefits to low-income populations and communities of color. Section 3.1.4, Environmental Justice Populations Outside of the Study Area, in Appendix G describes how the Racial Equity Toolkit process considered communities south in South Delridge, Highpoint, Highland Park, Westwood, and White Center during alternative development and preparation of the West Seattle and Ballard Link Extensions (WSBLE) Draft Environmental Impact Statement (EIS).</p>
2	<p>However, these won’t be considered until the Sound Transit Board becomes directly elected. It’s past time for the overburdened taxpayers in the Regional Transit Authority’s taxing district to insist on better accountability from Sound Transit’s Board and bureaucracy. Perhaps it’s time for our State government to step in and fix this mess.</p>	<p>Your comment has been noted.</p>

Subject	West Seattle Link
From	Chris Karnes
To	Email The Board
Sent	Thursday, September 19, 2024 10:37 PM

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Sound Transit Boardmembers-

My name is Chris Karnes. I live in Tacoma. I am a former member of the ST Citizen Oversight Panel appointed by the Board in 2017. My neighbors and I are anxiously awaiting construction and service to Seatac Airport via the final leg of light rail between Federal Way and Tacoma Dome. I am personally concerned about projected costs for the West Seattle Link extension. I worry that these increased costs could hamper Sound Transit's ability to deliver on the Tacoma Dome Link Extension (TDLE), due to the agency's debt ceiling.

TDLE has already been delayed twice to 2035. I fear it could face further postponements or scope reductions if West Seattle and Ballard Link costs continue to escalate without limit. TDLE's viability hinges on reaching the Tacoma Dome Station terminus, with limited opportunities for cost-cutting along that alignment.

It is time for the Board to seriously question the cost effectiveness of West Seattle Link if it means spending in excess of \$7 billion for 30,000 potential riders. King County Metro's ridership data shows that RapidRide C and H lines, which both serve West Seattle, served nearly 20,000 riders daily pre-pandemic. Is it really worth it to use so much of the region's financial capacity to build 4-car regional light rail to gain so few riders that are already generally well served by frequent and rapid service into Downtown Seattle today?

I am of the opinion that a no-build solution should be seriously considered if the necessary cost savings cannot be found. The Board should not allow one or two projects to tank the entire ST3 portfolio, not when there are areas with viable projects that lack robust regional transit access, like Pierce County.

I urge you to carefully consider these concerns and to advocate for solutions on the Board that balance regional transportation needs while ensuring responsible fiscal stewardship. Thank you for your time.

Sincerely,
Chris Karnes
Tacoma

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I am personally concerned about projected costs for the West Seattle Link extension. I worry that these increased costs could hamper Sound Transit's ability to deliver on the Tacoma Dome Link Extension (TDLE), due to the agency's debt ceiling.</p> <p>TDLE has already been delayed twice to 2035. I fear it could face further postponements or scope reductions if West Seattle and Ballard Link costs continue to escalate without limit. TDLE's viability hinges on reaching the Tacoma Dome Station terminus, with limited opportunities for cost-cutting along that alignment.</p> <p>It is time for the Board to seriously question the cost effectiveness of West Seattle Link if it means spending in excess of \$7 billion for 30,000 potential riders. King County Metro's ridership data shows that RapidRide C and H lines, which both serve West Seattle, served nearly 20,000 riders daily pre-pandemic. Is it really worth it to use so much of the region's financial capacity to build 4-car regional light rail to gain so few riders that are already generally well served by frequent and rapid service into Downtown Seattle today?</p> <p>I am of the opinion that a no-build solution should be seriously considered if the necessary cost savings cannot be found. The Board should not allow one or two projects to tank the entire ST3 portfolio, not when there are areas with viable projects that lack robust regional transit access, like Pierce County.</p>	<p>Your comment has been noted.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension. The purpose of the West Seattle Link Extension includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> • Provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan. • Connect regional centers as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's Regional Transit Long-Range Plan (2014). • Implement a system that is technically and financially feasible to build, operate, and maintain. <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>

Subject	9/19 executive committee public comment
From	Savannah Myers
To	Meeting Comments
Sent	Thursday, September 19, 2024 12:08 PM

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Dear Sound Transit Board Members,

I strongly support the “No Avalon Station” option for the West Seattle Link Extension. This option reduces residential and business displacements, minimizing community disruption while preserving parkland. It also offers significant cost savings, especially as project costs have escalated to \$6.7-\$7.1 billion. By eliminating Avalon Station, we can maintain a more streamlined and cost-effective project. Additionally, Delridge and Alaska Junction stations, along with bus integration, will provide sufficient transit access for the Avalon area, making the additional station unnecessary. I urge you to select this option for the benefit of our community.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I strongly support the “No Avalon Station” option for the West Seattle Link Extension. This option reduces residential and business displacements, minimizing community disruption while preserving parkland. It also offers significant cost savings, especially as project costs have escalated to \$6.7-\$7.1 billion. By eliminating Avalon Station, we can maintain a more streamlined and cost-effective project. Additionally, Delridge and Alaska Junction stations, along with bus integration, will provide sufficient transit access for the Avalon area, making the additional station unnecessary. I urge you to select this option for the benefit of our community.</p>	<p>Your support for Alternatives DEL-7 and WSJ-6 has been noted.</p>

Subject	9/19/2024 Executive Committee Meeting Public Comment:
From	Johannes Heine
To	Meeting Comments
Sent	Thursday, September 19, 2024 11:41 AM

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Dear Sound Transit Board Members,

I am writing to express my support for the "No Avalon Station" option in the West Seattle Link Extension (WSLE) project. While expanding light rail is critical, I believe the "No Avalon Station" option provides the most balanced and efficient solution for several key reasons:

1. Minimized Displacements and Environmental Impact

This option reduces residential and business displacements compared to alternatives, avoiding the disruption of up to 606 residential units and 35 businesses, and protecting parkland . It minimizes social and environmental upheaval in our community.

2. Cost Efficiency

The project cost has already escalated to \$6.7-\$7.1 billion, and removing Avalon Station is a more cost-effective alternative. Fewer stations reduce complexity and help manage the project's overall costs .

3. Sufficient Transit Coverage

The proximity of Delridge and Alaska Junction Stations will still provide excellent access to the Avalon neighborhood without the need for another stop. Improved bus-rail integration will support connectivity .

4. Less Construction Disruption

Removing Avalon Station reduces construction impacts, particularly along Fauntleroy Way and 35th Ave SW, minimizing disruptions to businesses and traffic .

Overall, the "No Avalon Station" option strikes the right balance between providing effective transit service, controlling costs, and minimizing impacts. I urge you to support this alternative.

Thank you for your time and consideration.

Johannes Heine
West Seattle Resident

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I am writing to express my support for the “No Avalon Station” option in the West Seattle Link Extension (WSLE) project. While expanding light rail is critical, I believe the “No Avalon Station” option provides the most balanced and efficient solution for several key reasons:</p> <p>Minimized Displacements and Environmental Impact</p> <p>This option reduces residential and business displacements compared to alternatives, avoiding the disruption of up to 606 residential units and 35 businesses, and protecting parkland . It minimizes social and environmental upheaval in our community.</p> <p>Cost Efficiency</p> <p>The project cost has already escalated to \$6.7-\$7.1 billion, and removing Avalon Station is a more cost-effective alternative. Fewer stations reduce complexity and help manage the project’s overall costs.</p> <p>Sufficient Transit Coverage</p> <p>The proximity of Delridge and Alaska Junction Stations will still provide excellent access to the Avalon neighborhood without the need for another stop. Improved bus-rail integration will support connectivity.</p> <p>Less Construction Disruption</p> <p>Removing Avalon Station reduces construction impacts, particularly along Fauntleroy Way and 35th Ave SW, minimizing disruptions to businesses and traffic .</p> <p>Overall, the “No Avalon Station” option strikes the right balance between providing effective transit service, controlling costs, and minimizing impacts. I urge you to support this alternative.</p>	<p>Your support for Alternatives DEL-7 and WSJ-6 has been noted.</p>

Subject	Comments - Sound Transit Executive Committee Meeting, September 19th, 2024
From	Donna Popich
To	Meeting Comments
Sent	Thursday, September 19, 2024 5:59 AM

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Dear Sound Transit Executive Committee Members,

I am a long-time West Seattle resident who voted for ST3. I am all for sensible transit.

What Does Not Make Transit Sense:

1. WSLE destroying a very densely populated, established community, including but limited to 70 businesses, over 500 housing units and acres of green space.
2. Cost overruns that are now costing taxpayers over 1.5 billion dollars per mile for an only 4+ mile route that doesn't go downtown.
3. Three (3) light rail stations built within a mile and a half of each other that offer NO PARKING.
4. Sensitive, protected and essential ecosystems destroyed and not fully mitigated, including Blue Heron rookeries, Peregrine Falcon nesting grounds, and salmon and beaver habitats. West Seattle cleans Seattle's air with over 1/3 of the city's tree canopy - 2 to 3 acres of these trees will be eliminated.
5. Sound Transit (ST) seems to be operating with outdated data. (The evolved needs of the West Seattle community must be taken into consideration),
6. ST3 is being built in a mainly affluent area of our community that already has transit options, while there is a transit desert down Delridge into White Center. This is an accessibility and an equity issue!
7. ST continuously maintains that the voters mandated building (exclusively) light rail. The voters want improved transit. There are more suitable options.
8. For up to a six-block radius of the construction zones, access to surrounding homes and businesses will be obstructed for years.
9. Carbon emission from building ST3 will take at best, 35 years to mitigate; and, at worst, over a century to mitigate.
10. The city is eliminating its own valuable taxpayer base by destroying an inordinate amount of businesses and homes that are tax revenue sources and then by obstructing access to existing businesses and homes.
11. ST insists that the West Seattle Bridge will not be closed during this project for up to 6 – 8 years; but, on the other hand, admits to the fact that the 35th Ave SW entrance to the bridge will be closed intermittently.

12. From my home in the Genesee Neighborhood, it takes 10 minutes to get downtown on the C Line. It will take 3 times that long (with at least one transfer) to get downtown using light rail.
13. To ST's own admission, only 3% of the population will use the WSLE.
14. There's a likelihood that our grandkids' grandkids will be paying for this project.
15. Why insist on proceeding with such a troubled, over budget (and counting) project when our taxpayer transit dollars can be better spent on suitable alternatives that better meet the needs of the West Seattle Community?

What DOES Make Transit Sense:

- 1. Put our taxpayer dollars to work pursuing more feasible, sensible, and affordable transit, including but not limited to enhanced (electric) bus service and BRT, roadway improvements, bridge and infrastructure maintenance.**
- 2. Have a *real* dialog between ST and the community.**
- 3. PUT ST3 ON HOLD INDEFINITELY!**

Thank you for your attention!

donna popich

4042 38th Ave SW

206-371-9003

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>What Does Not Make Transit Sense:</p> <ol style="list-style-type: none"> 1. WSLE destroying a very densely populated, established community, including but limited to 70 businesses, over 500 housing units and acres of green space. 2. Cost overruns that are now costing taxpayers over 1.5 billion dollars per mile for an only 4+ mile route that doesn't go downtown. 3. Three (3) light rail stations built within a mile and a half of each other that offer NO PARKING. 4. Sensitive, protected and essential ecosystems destroyed and not fully mitigated, including Blue Heron rookeries, Peregrine Falcon nesting grounds, and salmon and beaver habitats. West Seattle cleans Seattle's air with over 1/3 of the city's tree canopy - 2 to 3 acres of these trees will be eliminated. 5. Sound Transit (ST) seems to be operating with outdated data. (The evolved needs of the West Seattle community must be taken into consideration), 6. ST3 is being built in a mainly affluent area of our community that already has transit options, while there is a transit desert down Delridge into White Center. This is an accessibility and an equity issue! 7. ST continuously maintains that the voters mandated building (exclusively) light rail. The voters want improved transit. There are more suitable options. 8. For up to a six-block radius of the construction zones, access to surrounding homes and businesses will be obstructed for years. 9. Carbon emission from building ST3 will take at best, 35 years to mitigate; and, at worst, over a century to mitigate. 10. The city is eliminating its own valuable taxpayer base by destroying an inordinate amount of businesses and homes that are tax revenue sources and then by obstructing access to existing businesses and homes. 11. ST insists that the West Seattle Bridge will not be closed during this project for up to 6 – 8 years; but, on the other hand, admits to the fact that the 35th Ave SW entrance to the bridge will be closed intermittently. 12. From my home in the Genesee Neighborhood, it takes 10 minutes to get downtown on the C Line. It will take 3 times that long (with at least one transfer) to get downtown using light rail. 13. To ST's own admission, only 3% of the population will use the WSLE. 14. There's a likelihood that our grandkids' grandkids will be paying for this project. 15. Why insist on proceeding with such a troubled, over budget (and counting) project when our taxpayer transit dollars can be better spent on suitable alternatives that better meet the needs of the West Seattle Community? 	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
2	<p>What DOES Make Transit Sense:</p> <ol style="list-style-type: none">1. Put our taxpayer dollars to work pursuing more feasible, sensible, and affordable transit, including but not limited to enhanced (electric) bus service and BRT, roadway improvements, bridge and infrastructure maintenance.2. Have a real dialog between ST and the community.3. PUT ST3 ON HOLD INDEFINITELY!	<p>Your comment has been noted.</p>

Subject	Statement of in person public comment
From	Beth Boomgard
To	Meeting Comments
Cc	Joe Zagrodnik
Sent	Thursday, September 19, 2024 2:11 PM

[You don't often get email from beth.boomgard@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Public comment delivered in person at ST board meeting by Beth Boomgard-Zagrodnik.

The EIS does not sufficiently support moving forward with DEL-6b as the Delridge segment preferred alternative. We strongly urge the Board to reconsider and instead proceed with DEL-6a.

Compared to DEL-6a, the current preferred alternative results in :

- more commercial property acquisitions (19 v. 16 (-3))
- more job losses (130 v. 110, -20)
- and significantly higher noise impacts (160 vs. 68)
- and a price tag of an additional \$100-200 million

Additionally, DEL-6b ignores the impacts of the project on 12 single-family homes at 32nd Ave SW and Andover, including two I own. These homes are excluded from residential displacement counts but will be severely impacted, with:

- the train built mere feet away - closer than any other track to the front of a SFH in the system
- and destruction of the whole – not just the character – of the neighborhood during construction and operations with Visual, Aesthetic, Noise, Vibration, and Traffic impacts for all properties

Including these homes further neutralizes the difference between the alternatives (46 vs. 48 acquisitions).

Should the board make the arbitrary and capricious decision of continuing with the current preferred alternative, we would ask that Sound Transit consider acquiring some or all of the 12 homes, which I project would cost the agency less than \$10M in real property acquisition costs.

Why do this?

The parcels equate to ~85k square feet of land that is within a 5min walkshed of the Avalon station with amazing views of the Cascades to the West and the skyline of Seattle to the North.

Should Sound Transit acquire the parcels this land could be used for construction staging or immediately - instead of almost 20 years after the fact as was the case in the Rainier Valley - be transferred to transit-

oriented affordable housing developers to redevelop the parcels increasing the availability of affordable housing in the immediate walk shed of the Avalon Station in line with the construction timelines. This means Sound Transit would directly help increase the number of affordable housing units in the project vicinity.

Moreover, should Mayor Harrell be bolder in the One Seattle Plan regarding zoning in the neighborhood, there is opportunity for tremendous transit-oriented, affordable density on this combined parcel.

There is no reason that single family homes should be in the 5 min walk shed of a transit station and the only reason preventing this creative, mutually beneficial outcome is \$10M and the perception that Sound Transit is a train agency that should only focus on the design and development of high-capacity transit. You can and should do better.

I would happily welcome you to our home to show you what 6b means for us as parents and neighbors and small-business owners. More importantly, it would give you the opportunity to see with your own eyes how the parcels could be transformed to meet the true goal of the agency – a better future for all of us living in the Puget Sound.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The EIS does not sufficiently support moving forward with DEL-6b as the Delridge segment preferred alternative. We strongly urge the Board to reconsider and instead proceed with DEL-6a.</p> <p>Compared to DEL-6a, the current preferred alternative results in :</p> <ul style="list-style-type: none"> ○ more commercial property acquisitions (19 v. 16 (-3)) ○ more job losses (130 v. 110, -20) ○ and significantly higher noise impacts (160 vs. 68) ○ and a price tag of an additional \$100-200 million <p>Additionally, DEL-6b ignores the impacts of the project on 12 single-family homes at 32nd Ave SW and Andover, including two I own. These homes are excluded from residential displacement counts but will be severely impacted, with:</p> <p>the train built mere feet away - closer than any other track to the front of a SFH in the system</p> <ul style="list-style-type: none"> ○ and destruction of the whole – not just the character – of the neighborhood during construction and operations with Visual, Aesthetic, Noise, Vibration, and Traffic impacts for all properties ○ Including these homes further neutralizes the difference between the alternatives (46 vs. 48 acquisitions). <p>Should the board make the arbitrary and capricious decision of continuing with the current preferred alternative, we would ask that Sound Transit consider acquiring some or all of the 12 homes, which I project would cost the agency less than \$10M in real property acquisition costs.</p> <p>Why do this?</p> <p>The parcels equate to ~85k square feet of land that is within a 5min walkshed of the Avalon station with amazing views of the Cascades to the West and the skyline of Seattle to the North.</p> <p>Should Sound Transit acquire the parcels this land could be used for construction staging or immediately - instead of almost 20 years after the fact as was the case in the Rainier Valley - be transferred to transit-oriented affordable housing developers to redevelop the parcels increasing the availability of affordable housing in the immediate walk shed of the Avalon Station in line with the construction timelines.</p> <p>This means Sound Transit would directly help increase the number of affordable housing units in the project vicinity.</p> <p>Moreover, should Mayor Harrell be bolder in the One Seattle Plan regarding zoning in the neighborhood, there is opportunity for tremendous transit-oriented, affordable density on this combined parcel.</p> <p>There is no reason that single family homes should be in the 5 min walk shed of a transit station and the only reason preventing this creative, mutually beneficial outcome is \$10M and the perception that Sound Transit is a train agency that should only focus on the design and development of high-capacity transit. You can and should do better.</p>	<p>Your opposition to Preferred Option DEL-6b and support for Alternative DEL-6a has been noted. Properties to be acquired for project construction and operation will be finalized during final design, consistent with Sound Transit's enabling legislation and adopted Real Property Acquisition and Relocation Policy, Procedures, and Guidelines Summary (2017).</p>

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FW: 9/19/24 Sound Transit Executive Committee Meeting Public Comment for the record by John Niles, Smarter Transit

From Gamboa, Josephine <josephine.gamboa@soundtransit.org>

Date Fri 9/20/2024 8:46 AM

To West Seattle Link Extension <westseattlelink@soundtransit.org>; Wu, Phoebe <phoebe.wu@soundtransit.org>

 1 attachments (91 KB)

Prepared version of John Niles testimony to Sound Transit Executive Committee Sept 19, 2024.pdf;

Josephine Gamboa

Program Manager-Board Administration

Executive Department, Sound Transit

Pronouns: she/her

C 206-673-1126



From: John Niles <niles@globaltelematics.com>

Sent: Friday, September 20, 2024 8:08 AM

To: Meeting Comments <MeetingComments@soundtransit.org>

Subject: 9/19/24 Sound Transit Executive Committee Meeting Public Comment for the record by John Niles, Smarter Transit

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Sound Transit:

Full written version of my oral comments to the Sound Transit Executive Board and top management yesterday that I cut short to stay within two minutes. Please enter into the meeting record of yesterday.

Also, enter this document as a comment for the environmental record for the West Seattle light rail extension project.

--

John S. Niles

Co-founder, Smarter Transit

--

John S. Niles

President, Global Telematics | globaltelematics.com | [linkedin.com/in/globaltelematics/](https://www.linkedin.com/in/globaltelematics/)

Executive Research Director, CATES -- Center for Advanced Transportation and Energy Solutions

Research Associate, Mineta Transportation Institute, San José State University

Board Member, Ridesharing Institute

Regional Associate, Urban Robotics Foundation

Seattle, WA USA | +1-206-781-4475 | jniles@alum.mit.edu & all previous addresses still valid | Twitter:

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John Niles testimony to Sound Transit Executive Committee, September 19th.

I'm John Niles, Seattle resident, Sound Transit customer, and co-founder of Smarter Transit, an all volunteer, pro transit, non-partisan and non-profit organization. Congratulations for opening the Lynnwood extension. We hope it continues to see good ridership numbers.

Unfortunately, the current plans for ST3, extending light rail to West Seattle, Ballard, Issaquah, Tacoma and Everett is the most expensive way to attract the smallest number of new riders.

Thanks to the mandatory environmental process applied to the first of the planned ST3 segments, we are just now seeing the sustainability prospects for the West Seattle extension. And it's really bad news.

West Seattle performance forecasts so far revealed are screaming out non-sustainable metrics across all the three E's of sustainability: environment, economics, and equity.

For environment, the greenhouse gas emission measured in metric tons of carbon **exceed** the expected carbon reduction from new transit ridership and less driving in the vicinity of new light rail stations. I've looked up the formulas and done the math. Razing existing houses and businesses, cutting down trees, building trackway, bridges, tunnels, and stations with concrete generates carbon in massive amounts that will not be recovered for decades. If electric motors prevail in trucks, buses and cars in the 2040s, the carbon recovery won't ever pencil out.

On economics, the original ST3 design did not generate a benefit to cost ratio above one, and with the jump in the projected cost of the West Seattle line rising from under \$2 billion for the 2016 approval vote up to \$7 billion, plus with ridership projections not much above the RapidRide buses already serving the corridor, the ridership to cost ratio is abysmal. Instead, Sound Transit could contract with KC Metro for an electric bus service from Seattle CBD to all neighborhoods of the West Seattle peninsula down to Burien.

On equity, the same point of money and geographic coverage applies. Spend far fewer ST billions to serve all the neighborhoods with all disadvantaged demographic categories of folks living in the West Seattle peninsula, and avoid construction disruption and destruction affecting thousands of people living there now.

In conclusion, thank you for the environmental reviews to date, which are clearly screaming Do Not Build a multi-billion-dollar megaproject light rail short line into West Seattle, and spend just a portion of the money under existing Sound Transit authority for a solution that carries more riders for way less money.

Further, the incomplete EIS for the Ballard line is going in the same negative direction on sustainability. Can digging another tunnel under downtown Seattle possibly be good for the global climate?

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Unfortunately, the current plans for ST3, extending light rail to West Seattle, Ballard, Issaquah, Tacoma and Everett is the most expensive way to attract the smallest number of new riders.</p> <p>Thanks to the mandatory environmental process applied to the first of the planned ST3 segments, we are just now seeing the sustainability prospects for the West Seattle extension. And it's really bad news.</p> <p>West Seattle performance forecasts so far revealed are screaming out non-sustainable metrics across all the three E's of sustainability: environment, economics, and equity.</p> <p>For environment, the greenhouse gas emission measured in metric tons of carbon exceed the expected carbon reduction from new transit ridership and less driving in the vicinity of new light rail stations. I've looked up the formulas and done the math. Razing existing houses and businesses, cutting down trees, building trackway, bridges, tunnels, and stations with concrete generates carbon in massive amounts that will not be recovered for decades. If electric motors prevail in trucks, buses and cars in the 2040s, the carbon recovery won't ever pencil out.</p> <p>On economics, the original ST3 design did not generate a benefit to cost ratio above one, and with the jump in the projected cost of the West Seattle line rising from under \$2 billion for the 2016 approval vote up to \$7 billion, plus with ridership projections not much above the RapidRide buses already serving the corridor, the ridership to cost ratio is abysmal. Instead, Sound Transit could contract with KC Metro for an electric bus service from Seattle CBD to all neighborhoods of the West Seattle peninsula down to Burien.</p> <p>On equity, the same point of money and geographic coverage applies. Spend far fewer ST billions to serve all the neighborhoods with all disadvantaged demographic categories of folks living in the West Seattle peninsula, and avoid construction disruption and destruction affecting thousands of people living there now.</p> <p>In conclusion, thank you for the environmental reviews to date, which are clearly screaming Do Not Build a multi-billion-dollar megaproject light rail short line into West Seattle, and spend just a portion of the money under existing Sound Transit authority for a solution that carries more riders for way less money.</p>	<p>Your opposition to the West Seattle Link Extension has been noted. The project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor and station areas. The mode identified for this corridor was light rail. Refer to Chapter 1, Purpose and Need of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the need for the project.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>

Subject	West Seattle cost mitigation
From	rkoehler@cool-studio.net
To	Email The Board
Sent	Friday, September 20, 2024 1:36 PM

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Hello,

I have been a West Seattle resident and commuter for more than 20 years. I’m writing concerning the greater cost of ST3.

I have three ideas:

1. Drop Avalon station

Avalon station serves almost nobody. It’s sited at the entrance to the WS Bridge which puts it into conflict with cars.

Cancel it. We don’t need it. Save money.

2. Move Junction station one block east

Move the Junction station back to the Bank of America lot. This would be more central to the Junction, especially if Avalon is not built. It is adjacent to a large lot owned by Seattle Parks that could be borrowed for staging and then integrated into the station area.

It is smaller than the Jefferson Square site, and so cheaper. It will displace all those businesses and residents at Jefferson Square. Switching the plan to Jefferson Square (41st) really struck me as a needless land grab.

3. Build bus rapid transit (BRT) instead of light rail - a bus bridge

You may even be questioning whether rail is the right answer for West Seattle. A better answer could be focusing on bus transit. The scope could be reduced to only building a bus bridge over the Duwamish. That would save all the money on stations, tunnels, and elevated guideways.

This would tie into the busway through SODO that goes to SODO station. Work with Seattle to ensure that the bus corridor to the bridge remains and is improved.

It would be a flexible backup for the other two bridges over the Duwamish, given the bridges are sometimes closed for maintenance or will need to be replaced.

Most of West Seattle will be served by bus even after the rail is built. So, this would allow everyone living here to have a 1-seat ride instead of an unpopular transfer at a rail station.

Thank you,

Rich

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Drop Avalon station</p> <p>Avalon station serves almost nobody. It's sited at the entrance to the WS Bridge which puts it into conflict with cars. Cancel it. We don't need it. Save money.</p>	<p>Your support for Alternative WSJ-6 has been noted.</p>
2	<p>Build bus rapid transit (BRT) instead of light rail - a bus bridge</p> <p>You may even be questioning whether rail is the right answer for West Seattle. A better answer could be focusing on bus transit. The scope could be reduced to only building a bus bridge over the Duwamish. That would save all the money on stations, tunnels, and elevated guideways.</p> <p>This would tie into the busway through SODO that goes to SODO station. Work with Seattle to ensure that the bus corridor to the bridge remains and is improved.</p> <p>It would be a flexible backup for the other two bridges over the Duwamish, given the bridges are sometimes closed for maintenance or will need to be replaced.</p> <p>Most of West Seattle will be served by bus even after the rail is built. So, this would allow everyone living here to have a 1-seat ride instead of an unpopular transfer at a rail station.</p>	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension. The purpose of the West Seattle Link Extension includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> • Provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan. • Connect regional centers as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's Regional Transit Long-Range Plan (2014). • Implement a system that is technically and financially feasible to build, operate, and maintain.
3	<p>Move Junction station one block east</p> <p>Move the Junction station back to the Bank of America lot. This would be more central to the Junction, especially if Avalon is not built. It is adjacent to a large lot owned by Seattle Parks that could be borrowed for staging and then integrated into the station area.</p> <p>It is smaller than the Jefferson Square site, and so cheaper. It will displace all those businesses and residents at Jefferson Square. Switching the plan to Jefferson Square (41st) really struck me as a needless land grab.</p>	<p>As described in Section 2.1.1, Sound Transit Board Direction on Modified EIS Alternatives, of the Final EIS, the Sound Transit Board modified the Preferred Alternative in the West Seattle Junction Segment, Preferred Option WSJ-5b was added as a refinement to Draft EIS Alternative WSJ-5 (Final EIS Alternative WSJ-5a) to shift the Alaska Junction Station entrance closer to 42nd Avenue Southwest. Alternative WSJ-5a still includes the Draft EIS station location. Refinement of project design will continue throughout final design.</p>



FW: Notice of Availability - West Seattle Link Extension Final Environmental Impact Statement and Draft Programmatic Agreement- Invitation to Comment

From Swift, Lauren <lauren.swift@soundtransit.org>

Date Mon 9/23/2024 8:07 AM

To West Seattle Link Extension <westseattlelink@soundtransit.org>

Cc Wu, Phoebe <phoebe.wu@soundtransit.org>; Hampton, Jason <Jason.Hampton@soundtransit.org>

From: Donald Goodwin <D5Goodwin@Comcast.net>

Sent: Sunday, September 22, 2024 6:56 PM

To: Swift, Lauren <lauren.swift@soundtransit.org>; rob.saka@seattle.gov

Subject: Re: Notice of Availability - West Seattle Link Extension Final Environmental Impact Statement and Draft Programmatic Agreement- Invitation to Comment

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To those who Care,

The West Seattle Link Extension Project, needs to be Underground! The Link Extension Project down Martin Luther King, should have been underground. Since it was in a low income area, the decision makers did not Care! Currently, the Link Extension Project are underground or in industrial area's of the wealthier neighborhood. Why is it OK to go Way Over Budget in the wealthier neighborhood and not in District 1?

Please think of our Neighborhood Environment! Think of the Law Abiding, Tax Paying Citizens. District 1, Deserves to be treated fairly and equal to other area's in Seattle, King County, and Washington State.

Please call me, text me, or e-mail me if you have any questions, corrections, or criticisms for me!

Donald F. Goodwin

D5Goodwin@Comcast.net

206-714-1087

On September 12, 2024, at 1:29 PM, "Swift, Lauren" <lauren.swift@soundtransit.org> wrote:

Dear West Seattle and Ballard Link Extensions Draft Environmental Impact Statement Commenter/Hard copy requester:

On September 20, 2024, the Federal Transit Administration and Sound Transit will publish a Notice of Availability in the Federal Register for the Final Environmental Impact Statement (EIS) for the West Seattle Link Extension Project (Project). This Final EIS has been prepared in accordance with National and State Environmental Policy Act (NEPA/SEPA) requirements. It is available online at: <https://www.soundtransit.org/system-expansion/west-seattle-link-extension>. You are receiving this notice because you commented on the West Seattle Ballard Link Extension Draft EIS and/or requested a hard copy of that document.

The Draft EIS published in January 2022 evaluated both the West Seattle Link Extension and the Ballard Link Extension together as one West Seattle and Ballard Link Extensions Project. The extensions were evaluated together in the Draft EIS because of their location, schedule, and review efficiencies for partner agencies. As described in the July 10, 2023 letter to cooperating and participating agencies, the Sound Transit Board directed that further studies be prepared for the Ballard Link Extension, to evaluate additional station options and other refinements. Some of these project options and refinements require additional conceptual engineering and environmental review. Rather than delay completion of the environmental review process for the West Seattle Link Extension while additional review is conducted for the Ballard Link Extension, Sound Transit and FTA decided to move forward under separate environmental reviews for each extension. Accordingly, this Final EIS is for the West Seattle Link Extension only. The Ballard Link Extension will undergo separate environmental review, building on the analysis that has already been completed. This West Seattle Link Extension Final EIS includes responses to comments received on the West Seattle and Ballard Link Extensions Draft EIS that are specific to the West Seattle Link Extension or that would apply to both projects (See Appendix O, Draft EIS Comments). Comments specific to the Ballard Link Extension as well as those that apply to both projects will be responded to as part of the environmental review process for the Ballard Link Extension Project.

Final EIS Distribution

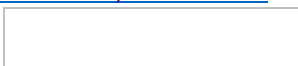
Distribution of the Final EIS is primarily electronic through the link provided above. Printed hard copies of the Executive Summary, Final EIS, and appendices, or a flash drive with the entire Final EIS are available upon request at dominique.jones@soundtransit.org.

Section 106 Update

Pursuant to 36 CFR Part 800 of the National Historic Preservation Act, FTA will publish a separate notice in the Federal Register to invite comments on the draft Programmatic Agreement that is published with the Final EIS. The link above includes access to the draft Section 106 Programmatic Agreement with the Historic and Archaeological Resources Technical Report (Appendix N.5). Comments on the Programmatic Agreement can be sent via email to wsle-programmatic-agreement-comment@soundtransit.org. Following the 30-day public comment period, FTA, in coordination with Sound Transit, will address comments on the Programmatic Agreement and revise the document accordingly. The Programmatic Agreement will be finalized through ongoing consultation with SHPO, Tribes and consulting parties, and executed prior to FTA's issuance of a NEPA Record of Decision.

Lauren Swift, AICP
Central Corridor Environmental and Business Operations Manager

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Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The West Seattle Link Extension Project, needs to be Underground! The Link Extension Project down Martin Luther King, should have been underground. Since it was in a low income area, the decision makers did not Care! Currently, the Link Extension Project are underground or in industrial area's of the wealthier neighborhood. Why is it OK to go Way Over Budget in the wealthier neighborhood and not in District 1?</p> <p>Please think of of our Neighborhood Environment! Think of the Law Abiding, Tax Paying Citizens. District 1, Deserves to be treated fairly and equal to other area's in Seattle, King County, and Washington State.</p>	<p>Your support for tunnel alternatives has been noted. Refer to Appendix G, Environmental Justice, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for a description of impacts and benefits to low-income communities and people of color.</p>

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From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- Data calls FTA to reconsider support for Sound Transit's West Seattle-Ballard light rail
Date: Wednesday, November 27, 2024 9:33:10 AM

From: MartinWesterman <artartart@seanet.com>
Sent: Monday, September 23, 2024 3:46 PM
To: Fletcher, Susan (FTA) <susan.fletcher@dot.gov>
Cc: Rastelli, Scot (FTA) <Scot.Rastelli@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; Swaby, Howard (FTA) <howard.swaby@dot.gov>; Stojak, Mark (FTA) <mark.stojak@dot.gov>; Ziglar, Kristine (FTA) <Kristine.Ziglar@dot.gov>; Berkson, Rachel <Rachel.Berkson@mail.house.gov>
Subject: Data calls FTA to reconsider support for Sound Transit's West Seattle-Ballard light rail

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Greetings Madame Administrator, Directors and Specialists,

We are encouraging you to suspend FTA's support for Sound Transit's Ballard-Downtown-West Seattle light rail proposal (WSBLE), until all costs, impacts and ridership data are reconsidered. The FEIS has just been issued, and the issues raised in the 2022 DEIS have not been addressed. Any move forward from here without reconsideration will look more like political expediency than wisdom,

Can the proposed \$5 billion budget for the Downtown-West Seattle segment (WSLE) be spent better to improve transit?

The FTA and UMTA have long expressed concerns over light rail's impact on transit costs:

- In 1986, UMTA Deputy Director Rick Setner told American Demographics Magazine that light rail was not flexible, it was cost prohibitive, and "If you have six miles to do, it makes no sense to build six miles of tunnel, track and wire." Yet, he said, "many city officials look at light rail as a panacea. It's new, it's glitzy, and they think it makes them a world class city."
- On May 18, 2010, USDOT Undersecretary, Peter Rogoff said that financial difficulties facing mass transit networks are partially due to an "unnecessary focus" on rail expansion over bus improvements. Using the flexibility of buses, "you can move a lot of people at very little cost compared to rail." Rogoff is also former CEO of Sound Transit.

Seattle was fully served by rail 100 years ago, when 50 miles of interurban rail lines connected it to Everett in the north and Tacoma in the south, and its 70 miles of urban trolley and streetcar lines covered the city. That included 12 miles of track from downtown to West Seattle (WS), where it connected the northern and southern ends of the 10 square mile West Seattle (WS) peninsula. Then in the 1940s, Seattle tore it all out. Now Sound Transit is trying to recreate it.

In 2016, Sound Transit's ST3 transportation package laid out simple criteria for voters to approve:

- improve public transit and boost ridership,
- protect the environment, and
- encourage economic development, equity, community-building and social justice.

In its 2022 DEIS, Sound Transit wanted to show that WSLE offered more advantages than disadvantages. Instead, ST has shown the opposite is true. Neither WSLE nor the Downtown-West Seattle segment satisfies ST3 and DEIS criteria. WSLE should not be built:

- WSLE transit times and therefore ridership will degrade rather than improve.
- Construction will generate 614,000 tons of carbon, more than WSLE trains can ever mitigate
- Acres of forest and habitat will be eliminated, much of it with irreparable damage
- Economic development will be set back for at least a decade
- Equity, community-building and social justice will be set back at least a decade.

As you may already know,

- Though light rail investments may increase transit and ridership within high-demand corridors, they do not reduce congestion in "sprawl" cities: (<https://transfersmagazine.org/magazine-article/issue-2/does-light-rail-reduce-traffic/>).
- Most median income gains near new rail line developments go to high-income neighborhoods, not low-income transit users: (<https://uh-ir.tdl.org/items/5f739132-7b70-4585-9884-fafa2b2634bd>):
- Per capita transit ridership is declining as mobility and commuting behavior shift away from traditional transportation modes: (<https://scitechdaily.com/environmental-trade-offs-of-autonomous-vehicles-convenience-will-likely-come-at-a-cost/> 18 May 2021, and *Environmental Research Letters*, and DOI: [10.1088/1748-9326/abf6f4](https://doi.org/10.1088/1748-9326/abf6f4)).
- U.S. transit ridership has declined since 2013, despite continued growth in population: (https://www.researchgate.net/publication/325906474_The_Effect_of_Demographic_Changes_on_Transit_Ridership_Trends)
- [Sound Transit revenues do not cover its operating expenses](#). When construction costs are added, investments will never be recouped.

Metro Transit in 2014 told the West Seattle Transportation Coalition citizen's group that it would cancel a bus route costing more than \$7 per rider (\$10 in 2024 dollars). Metro told WSTC in 2017 that the four-mile WSLE segment would free its buses from having to travel that corridor, and enable it to redeploy those buses for better local service in West Seattle, downtown and beyond.

- Metro is basically advocating to transfer its \$10 per rider passengers in West Seattle onto WSLE, which will cost \$185,000 per rider on its opening day, then transfer that passenger back to a \$10 per rider Metro bus for further conveyance.
- Note: ST has reduced its WSLE ridership forecasts by 50% since 2015, from 58,000 /day then to 27,000 /day now, and ST has not hit its ridership projections since 2010. WSLE cost may drop to \$600 per rider after the first year if ST ridership projections are accurate.
- Cost per hour of user benefit is key to determining cost effectiveness.
 - After tallying operating, maintenance. and capital costs, and dividing by hours of

benefit (travel time savings to existing and new riders, and net new riders), we get a result that may indicate that it may be beneficial to move people from bus to rail. That result will be misleading if the agency is only measuring a trip without including the full distance.

Beyond that, the Biden-Harris Administration is working to reduce U.S. carbon footprint. We expect USDOT (and UMTA and FTA) to be deeply engaged in this, both because the U.S. transportation sector generates about 31% of total U.S. energy-related carbon emissions, and because light rail construction generates more GhG than its running trains will ever mitigate:

- WSBL construction will output about three million tons of carbon, plus more generated by traffic congested during 5-8 years of build-out
- WSLE construction will generate 614,000 tons of carbon, plus traffic congestion GhGs
- Data and experience show that Sound Transit's mitigation plan — shifting drivers from personal vehicles to trains, will not occur in quantities that will mitigate the carbon it has generated
- ST has exacerbated its mitigation failure by already having cut about 140 acres of forest for its north-south trunk line; trees that would have absorbed approximately four million tons of carbon per year. ST has not tallied deforestation and erased sequestration material.
 - Deforestation also makes Seattle's heat islands worse, particularly in lower income areas
- Further, under Washington State's Climate Commitment Act (CCA), Sound Transit's level of carbon emissions – 500,000-600,000 tons per year – qualify it as a “large quantity carbon emissions generator.” Yet ST is not being required to pay for investments in carbon sequestration, as other entities are under the law.

The Puget Sound Regional Council predicts that by 2050, light rail will carry less than 3% of regional trips, buses less than 5%. and combined, the two modes will carry no more than 15% of Seattle trips. Unless FTA's ridership data and projections are more current than PSRC's, it would appear that FTA is supporting a \$4 billion investment in four miles of light rail that will not improve transit ridership.

In the 1980s, when the Shirley Highway HOV lanes in Northern Virginia were the busiest transit lanes in the U.S. outside of NYC, and carried more passengers than Chicago's Dan Ryan Expressway, UMTA approved Seattle's plan for a Third Ave. bus tunnel. Supporters expected it to help speed Metro Transit buses through downtown, improve bus service and rider experience, and reduce traffic congestion through downtown. Except for reducing traffic on a one-mile stretch of Third Avenue above the tunnel, none of the original expectations came true — even though it has now been converted to a bus-light rail tunnel. As part of WSLE, Sound Transit proposes to build a second tunnel, exclusively for light rail.

In 1988, Mr. Sentner said in some cities, light rail is appropriate, but in many more, it is cost prohibitive, has very limited application, or is not appropriate at all. "Instead of looking to be world class, cities should look to move people around," he said.

Currently between West Seattle and Downtown, riders can take a one seat, no transfer ride via bus. With light rail, they'll take a three seat, two-transfer ride over the same distance. A transit system can only be successful if it picks up people where they are, takes them where they want to go for a price they want, at time they want. With its transfer penalties and longer

transit times, WSLE is not an option for success.

We would be happy to meet with you to discuss better transit options for Seattle's west side transit corridor.

All the best,
Martin Westerman and Regional Transit Partners

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>We are encouraging you to suspend FTA's support for Sound Transit's Ballard-Downtown West Seattle light rail proposal (WSBLE), until all costs, impacts and ridership data are reconsidered. The FEIS has just been issued, and the issues raised in the 2022 DEIS have not been addressed. Any move forward from here without reconsideration will look more like political expediency than wisdom. Can the proposed \$5 billion budget for the Downtown-West Seattle segment (WSLE) be spent better to improve transit?</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>
2	<p>Currently between West Seattle and Downtown, riders can take a one seat, no transfer ride via bus. With light rail, they'll take a three seat, two-transfer ride over the same distance. A transit system can only be successful if it picks up people where they are, takes them where they want to go for a price they want, at time they want. With its transfer penalties and longer transit times, WSLE is not an option for success</p>	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension. The purpose of the West Seattle Link Extension includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> • Provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan. • Connect regional centers as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's Regional Transit Long-Range Plan (2014). • Implement a system that is technically and financially feasible to build, operate, and maintain.

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From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- Data calls FTA to reconsider support for Sound Transit's West Seattle-Ballard light rail
Date: Wednesday, November 27, 2024 9:33:32 AM
Attachments: [image001.png](#)

From: MartinWesterman <artartart@seanet.com>

Sent: Monday, September 23, 2024 3:14 PM

To: Fletcher, Susan (FTA) <susan.fletcher@dot.gov>

Cc: Rastelli, Scot (FTA) <Scot.Rastelli@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; Swaby, Howard (FTA) <howard.swaby@dot.gov>; Stojak, Mark (FTA) <mark.stojak@dot.gov>; Ziglar, Kristine (FTA) <Kristine.Ziglar@dot.gov>

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May we meet to discuss this issue? Our question is simple: can the proposed \$6-\$7 billion budget for the Downtown-West Seattle segment (WSLE) be spent better to improve transit? Perhaps you can help us find the answer.

The FTA and UMTA have long expressed concerns over light rail's impact on transit costs:

- In 1986, UMTA Deputy Director Rick Setner told American Demographics Magazine that light rail was not flexible, it was cost prohibitive, and "If you have six miles to do, it makes no sense to build six miles of tunnel, track and wire." Yet, he said, "many city officials look at light rail as a panacea. It's new, it's glitzy, and they think it makes them a world class city."
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In 2016, Sound Transit's ST3 transportation package laid out simple criteria for voters to approve:

- improve public transit and boost ridership,
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In its 2022 DEIS, Sound Transit sought to show that WSLE satisfied those criteria, and offered more advantages than disadvantages. Instead, ST has shown the opposite is true. Thus, WSLE should not be built:

- WSLE transit times and therefore ridership will degrade rather than improve.
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- U.S. transit ridership has declined since 2013, despite continued growth in population: (https://www.researchgate.net/publication/325906474_The_Effect_of_Demographic_Changes_on_Transit_Ridership_Trends)
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- Note: ST has reduced its WSLE ridership forecasts by 50% since 2015, from 58,000 /day to 27,000 /day now, and ST has not hit its ridership projections since 2010.
 - Reckoning ST's forecast yearly ridership (apx. 4 million) plus \$40 million O&M per year, the per rider cost may drop to somewhere between \$600 and \$1500 per

rider in the second year and subsequent years of service, if ST ridership projections are accurate.

Beyond that, the Biden-Harris Administration is working to reduce U.S. carbon footprint. We expect USDOT (and UMTA and FTA) to be engaged in this carbon reduction effort, both because the U.S. transportation sector generates about 31% of total U.S. energy-related carbon emissions, and because light rail construction generates more GhG than transfer of road drivers to its running trains will ever mitigate:

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- ST has exacerbated its mitigation failure by cutting carbon-absorbing trees —about 140 acres of forest so far for its north-south trunk line. The trees would have absorbed up to four million tons of carbon per year. ST has not tallied lost sequestration due to deforestation.
 - Deforestation also makes Seattle's heat islands worse, particularly in lower income areas — an overlooked inequity
- Further, under Washington State's Climate Commitment Act (CCA), Sound Transit's level of carbon emissions – 500,000-600,000 tons per year – qualify it as a “large quantity carbon emissions generator.” Yet ST is not being required to pay for investments in carbon sequestration, as other entities are under the law.

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In 1988, Mr. Sentner said in some cities, light rail is appropriate, but in many more, it is cost prohibitive, has very limited application, or is not appropriate at all. "Instead of looking to be world class, cities should look to move people around," he said. Cost per hour of user benefit is key to determining cost effectiveness. After tallying operating, maintenance, and capital costs, and dividing by hours of benefit (travel time savings to existing and new riders, and net new riders), we get a result that may indicate that it may be beneficial to move people from bus to rail. That result will be misleading if the agency is only measuring a trip without

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We would be happy to meet with you to discuss better transit options for Seattle's west side transit corridor.

All the best,
Martin Westerman, Martin Pagel, and Regional Transit Partners

Begin forwarded message:

From: "Martin Pagel" <mjpagel@gmail.com>
Subject: RE: STB's Nathan Dickey defends WSLE (sent by Robinson -- "I assume you read this")
Date: June 27, 2024 at 10:26:49 PM PDT
To: "MartinWesterman" <artartart@seanet.com>

Try:

Scot Rastelli
Director of Planning and Program Development
Federal Transit Administration – Region 10
915 Second Avenue; Suite 3192
Seattle, WA 98174
P: 206-220-7965

Mark A. Assam, AICP
Environmental Protection Specialist
U.S. Department of Transportation
Federal Transit Administration | Office of Environmental Programs
915 2nd Avenue, Suite 3192 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

From: MartinWesterman <artartart@seanet.com>
Sent: Thursday, June 27, 2024 9:14 PM
To: Martin Gondola Pagel <mjpagel@gmail.com>
Subject: Re: STB's Nathan Dickey defends WSLE (sent by Robinson -- "I

assume you read this")

FTA contact info:

[Regional Administrator](#)

[Staff Organization](#)

Contact Us

Region 10 Office
Federal Transit Administration
915 Second Avenue
Suite 3192
Seattle, WA 98174-1002
United States

Phone: [206-220-7954](tel:206-220-7954) 📞

Fax: [206-220-7518](tel:206-220-7518) 📠

Business Hours:

8:30 a.m.-5 p.m. PT, M-F

If you are deaf, hard of hearing, or have a speech disability, please dial 7-1-1 to access telecommunications relay services.

On Jun 27, 2024, at 9:12 PM, MartinWesterman
<artartart@seanet.com> wrote:

Here's the FTA Seattle office staff & duties list:

<Screenshot 2024-04-18 at 7.16.35 AM.png>FTA:

On Jun 26, 2024, at 12:32 PM, Martin Pagel
<mjpagel@gmail.com> wrote:

some people talk about steel ropes,
like: [SUSPENSION BRIDGE | English meaning - Cambridge Dictionary](#)

You could argue that "rope" is twisted strands and
come in natural fibers, nylon or metal wire
variety: [ROPE | English meaning - Cambridge Dictionary](#)

On Wed, Jun 26, 2024 at 11:44 AM John Niles
<niles@globaltelematics.com> wrote:

So the term rope is historical and not literal. I'm a
former naval officer and there was a distinction
between ropes and cables.

Sent from my T-Mobile 5G Device
Get [Outlook for Android](#)

From: Martin Pagel <mjpagel@gmail.com>
Sent: Wednesday, June 26, 2024 11:12:10 AM
To: John Niles <niles@globaltelematics.com>
Cc: MartinWesterman <artartart@seanet.com>
Subject: Re: STB's Nathan Dickey defends WSLE
(sent by Robinson -- "I assume you read this")

transit terminology varies around the world, in
particular for gondolas, but even regular transit
terms like "trams" are not well defined - Tacoma
Link should be a tram, not a light rail, but in Europe
light rail is not really used at all. What's a metro?
what's a light metro?

some talk about gondolas, some use ropeway or
cable based transit as the catch all for aerial tram,
pulse/group systems and detachable gondola
system.

On Wed, Jun 26, 2024 at 12:56 AM John Niles

<niles@globaltelematics.com> wrote:

Why is the word "ropeway" used to describe the Mexico system? Unlike a steel cable, it permits imagining that it can be cut with a sharp knife.

On 6/25/2024 9:29 PM, Martin Pagel wrote:

Mexico City has the best urban gondolas in North America,

--

John S. Niles

President, Global Telematics

| globaltelematics.com | [linkedin.com/in/globaltelematics/](https://www.linkedin.com/in/globaltelematics/)

Executive Research Director, CATES -- Center for Advanced Transportation and Energy Solutions
Research Associate, Mineta Transportation Institute, San José State University
Board Member, Ridesharing Institute
Regional Associate, Urban Robotics Foundation
Seattle, WA USA | +1-206-781-4475

| jniles@alum.mit.edu & all previous addresses still valid | Twitter: @EndOfDriving and @JN_Seattle

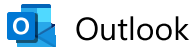
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Preview of book at <http://endofdriving.org>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
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2	Currently between West Seattle and Downtown, riders can take a one seat, no transfer ride via bus. With light rail, they'll take a three seat, two-transfer ride over the same distance. A transit system can only be successful if it picks up people where they are, takes them where they want to go for a price they want, at time they want. With its transfer penalties and longer transit times, WSLE is not an option for success.	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension. The purpose of the West Seattle Link Extension includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> • Provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan. • Connect regional centers as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's Regional Transit Long-Range Plan (2014). • Implement a system that is technically and financially feasible to build, operate, and maintain.



why not delridge way

From dan betts <dan06betts@gmail.com>

Date Mon 9/23/2024 4:11 PM

To West Seattle Link Extension <westseattlelink@soundtransit.org>

[You don't often get email from dan06betts@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Why don't you go along delridge way?
much easier than going to alaska junction!
Will serve more people over time.
Most of the people who live near avalon are living in retirement homes.
Most of the people who live along delridge way are the working class who
would use the light rail much more than the ones at Avalon or the Alaska
junction.
There is no parking at either Avalon or the Alaska junction, so the
number of people who could use it would be very limited.
Parking at or near Delridge way is much easier.

It would be much more cost effective to go South/North at street level
on Delridge Way and service more people.
You could build a parking garage at or near Westwood village or along
Roxbury; near either the safeway to the West or Greenbridge affordable
housing to the East.

Other option would be to have a large transit hub at the 1. North end of
Delridge Way and SW Charlestown Street or 2. build a large one on the
South Side of Harbor Island; or 3. near the River Mill.
This would be easier, service more people and be more cost effective.

I hope there is something that can be done to service more people in
West Seattle and I believe a route that went South at street level on
Delridge Way would do that.

thank you

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Why don't you go along delridge way? much easier than going to alaska junction! Will serve more people over time.</p> <p>Most of the people who live near avalon are living in retirement homes.</p> <p>Most of the people who live along delridge way are the working class who would use the light rail much more than the ones at Avalon or the Alaska junction.</p> <p>There is no parking at either Avalon or the Alaska junction, so the number of people who could use it would be very limited. Parking at or near Delridge way is much easier.</p> <p>It would be much more cost effective to go South/North at street level on Delridge Way and service more people.</p> <p>You could build a parking garage at or near Westwood village or along Roxbury; near either the safeway to the West or Greenbridge affordable housing to the East.</p>	<p>A potential light rail extension from West Seattle to Burien was considered in Sound Transit's Regional Transit Long-Range Plan (2014), which identifies Sound Transit's envisioned network of services when the regional transit system is complete. The West Seattle Link Extension represents the portion of the long-range plan for the West Seattle to Burien corridor that was included in the Sound Transit 3 Plan, the next phase of mass transit improvements in the Puget Sound region, financing for which was approved by the voters in 2016. Light rail to South Park, Georgetown, White Center, and Burien was studied as part of Sound Transit's South King County High-Capacity Transit Corridor Study (2014), which identified alternatives for consideration in the Sound Transit 3 package. Ultimately this service was not included in the Sound Transit 3 Plan. Instead, the plan includes service to West Seattle, which is an important access point for regional connections from more affordable areas south of the project corridor, such as High Point, Highland Park, and the unincorporated King County neighborhood of White Center. The West Seattle Link Extension would allow for future extension south, and the Sound Transit 3 Plan includes study of future high-capacity transit connecting West Seattle to Burien.</p>
2	<p>Other option would be to have a large transit hub at the 1. North end of Delridge Way and SW Charlestown Street or 2. build a large one on the South Side of Harbor Island; or 3. near the River Mill. This would be easier, service more people and be more cost effective.</p>	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>



Re: West Seattle Link Extension

From West Seattle Link Extension <westseattlelink@soundtransit.org>

Date Wed 10/2/2024 8:46 AM

To Martin Lee <marty747400@yahoo.com>

Thank you for your email. We have received your feedback and appreciate your continued engagement with the West Seattle Link Extension project.

We anticipate that the Sound Transit Board will consider action to select the project to be built as soon as October. The Board is expected to consider this action at its meetings on Oct. 10 and Oct. 24. The decision is based on years of technical analysis and community feedback. Then, the FTA is anticipated to issue a Record of Decision which will conclude the environmental review phase. More information is available on the [Board of Directors website](#).

Please visit our [project website](#) and [sign up for email updates](#) to stay connected with us and learn about upcoming project milestones.

Sincerely,
The West Seattle Link Extension team

Project team

West Seattle Link Extension
Sound Transit
tel 206-903-7229

Connect with us
soundtransit.org/wslink
facebook.com/SoundTransit
twitter.com/SoundTransit



From: Martin Lee <marty747400@yahoo.com>
Sent: Tuesday, September 24, 2024 8:47 AM
To: West Seattle Link Extension <westseattlelink@soundtransit.org>
Subject: West Seattle Link Extension

You don't often get email from marty747400@yahoo.com. [Learn why this is important](#)

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I recently received a brochure about the West Seattle Link Extension.
I noticed the plan was approved by voters in 2016, 8 years ago.
Since that time we have been through a pandemic, had a bridge that was being repaired for several years and people have changed their methods of commuting.

I saw a report from a news station that the extension was going to cost in excess of 7 Billion dollars. Not sure if this is the true number, but if it is, history has shown us that that number will grow as the project moves forward.

My question is: Due to all of these events, isn't it time to reevaluate the project? Are we sure we need this link to West Seattle, can the money be moved to other improvements, for example expanding I5?

I don't work in downtown Seattle, however, I go there frequently via the Rapid Transit C Bus. It works great, it's hardly ever over crowded, and due to the bus lanes, the time to get to downtown is minimal.

Will there be future meetings to discuss these matters? Can the project be reevaluated?

Regards,

Martin F. Lee
317-260-0928

Appendix C. Comments Received on the Final EIS and Responses

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1	<p>I recently received a brochure about the West Seattle Link Extension. I noticed the plan was approved by voters in 2016, 8 years ago. Since that time we have been through a pandemic, had a bridge that was being repaired for several years and people have changed their methods of commuting. I saw a report from a news station that the extension was going to cost in excess of 7 Billion dollars. Not sure if this is the true number, but if it is, history has shown us that that number will grow as the project moves forward. My question is: Due to all of these events, isn't it time to reevaluate the project? Are we sure we need this link to West Seattle, can the money be moved to other improvements, for example expanding I5? I don't work in downtown Seattle, however, I go there frequently via the Rapid Transit C Bus. It works great, it's hardly ever over crowded, and due to the bus lanes, the time to get to downtown is minimal.</p> <p>Will there be future meetings to discuss these matters? Can the project be reevaluated?</p>	<p>Your comment has been noted.</p> <p>Sound Transit will continue to coordinate with the community as design advances. Community events and meetings are posted to the project website https://www.soundtransit.org/system-expansion/west-seattle-link-extension.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension. The purpose of the West Seattle Link Extension includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> • Provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan. • Connect regional centers as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's Regional Transit Long-Range Plan (2014). • Implement a system that is technically and financially feasible to build, operate, and maintain. <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>

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Subject	West Seattle Light Rail
From	Bill Hirt
To	Meeting Comments
Sent	Tuesday, September 24, 2024 5:53 PM

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Attention Sound Transit Board.

below attachment from my blog <http://stopeastlinknow.blogspot.com> before continuing to proceed with the West Seattle extension.

You should consider the
Bill Hirt

The Seattle Times Sept. 18th Traffic Lab article, “West Seattle’s light rail estimate soars past \$6 billion” exemplifies the paper’s support for Sound Transit’s approach to the area’s transportation problems. Abetting claims the latest estimate “somewhere between \$6.7 billion and \$7.1 billion” are no reason to panic, but a good reason to forge ahead”.

What the voters approved in 2016, \$2.3 billion, has apparently gotten Terri Mestas, the deputy CEO Megaproject deliverer's approval, to spend the additional funds. That Sound Transit considers the need for drastic reductions as premature. Mestas said “her team still has a long runway to cope with West Seattle cost”. The article reports “an advisory panel of outside experts gave high marks for management reorganization, and said Sound Transit now has the best talent available”.

What she and her team (and outside experts) apparently won't consider is whether there’s any real need for light rail from Alaska Junction to Sodo. King County Metro already provides Rapid Ride C and Rapid Ride H, 24-hour service to the entire area. During peak commute Rapid Ride C buses run every 15 minutes from Westwood Village, Fauntleroy Ferry to Alaska Junction, down Avalon Way, across West Seattle Bridge to Highway 99, 3rd Ave in Seattle, and Westlake Ave to South Lake Union. Schedules typically show 20 minutes from Alaska Junction to 3rd Ave & Seneca. Late night and early morning intervals stretch from 20 minutes to hourly.

Rapid Ride H runs on a similar schedule from Burien T/C to White Center along Delridge Way to West Seattle Bridge to Highway 99 and 3rd Ave, taking 18 minutes from Myrtle St on Delridge to Madison St on 3rd Ave. KCM also provides Route 21 along 35th Ave in West Seattle, again down Avalon Way, across bridge to Sodo and 1st Ave into Seattle. It’s routed from 4:40 am to 12:42 am, again on similar intervals.

All three routes provide multiple stops for access in West Seattle and egress on 3rd Ave in Seattle and beyond. Yet access to West Seattle light rail is limited to stations at Alaska Junction, Avalon, and Delridge and egress at Sodo. There, commuters will need to transfer to Line 1, sharing its capacity into and out of the CID station. A dubious option at best as any potential transit time savings will be offset by the need to transfer

The bottom line is the Traffic Lab is the Seattle Times project that “comments on how transportation funds are spent”. Yet the Sept 18th article abets Sound Transit spending up to \$7,100 million, presumably on the assumption thousands of West Seattle area commuters will choose light rail rather than bus routes into and out of Seattle.

The Traffic Lab and the new Megaproject delivery hire need to consider “Does West Seattle need Light Rail?”.

Appendix C. Comments Received on the Final EIS and Responses

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1	<p>The bottom line is the Traffic Lab is the Seattle Times project that “comments on how transportation funds are spent”. Yet the Sept 18th article abets Sound Transit spending up to \$7,100 million, presumably on the assumption thousands of West Seattle area commuters will choose light rail rather than bus routes into and out of Seattle.</p> <p>The Traffic Lab and the new Megaproject delivery hire need to consider “Does West Seattle need Light Rail?”.</p>	Your comment has been noted.

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Subject	Re: Automatic reply: Will you allow Sound Transit to worsen the city's budget crisis, and destroy your turf?
From	MartinWesterman
To	Email The Board
Cc	tanya.woo@seattle.gov ; Teresa Mosqueda; Robert.Kettle@seattle.gov ; sara.nelson@seattle.gov ; Strauss, Dan; Zahilay, Girmay; Joy.Hollingsworth@seattle.gov ; Rob Saka; John Niles; Martin Gondola Pagel; Marilyn Kennell; Kim Schwarzkopf; Conrad Gondola Cipoletti; Alan McMurray; Aaron Broyde; James Boyle
Sent	Thursday, September 26, 2024 12:09 PM
Attachments	<<Final RethinkTheLink^J Environmental Conclusion^J Sept 24^J 2024^J Version 4.1.pdf>>

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Greetings ST Board members,

The nearly 1000-page West Seattle Link Extension FEIS released last week does not address most of the concerns raised by commenters on the 2022 Draft EIS. These included concerns raised by a wide range of organizations and businesses, including the City of Seattle, Seattle Green Spaces Coalition, Chinatown-International District citizen groups, Uwajimaya, West Seattle businesses, West Seattle SkyLink, regional transit experts, and many others.

Several of those commenters have therefore assembled an alternative FEIS that does offer options and solutions for these concerns. It is attached here, and will inform comments at today’s Sound Transit board meeting, and discussions going forward. It calls for the No Build option.

The ST3 transportation package that Sound Transit presented to voters in 2016 offered simple criteria for voters to consider:

- improve public transit,
- encourage economic development, equity, community-building and social justice,
- protect the environment.

Since the 2016 ST3 vote, Sound Transit divided WSBLE into Ballard (BLE) and West Seattle (WSLE) segments. Its environmental review process has revealed overwhelmingly negative social, economic and environmental impacts. As the West Seattle Link Extension (WSLE) presents significantly more drawbacks than advantages, and does not satisfy the ST3 and DEIS criteria, it should not be built.

Thank you,

Martin Westerman and Regional Transit Colleagues

I'm looking for a minimum level of competence on this board that is supposed to manage America's biggest light rail development.

In 2014, your Metro Transit representative Chris Arkills told the West Seattle Transportation Coalition that it will cancel a bus route if it costs more than \$7 per rider (that's about \$10 in 2024 dollars). That looked like Metro was being prudent with taxpayer money.

But the West Seattle light rail FEIS says light rail will only carry 27,000 riders per day in 2032. That's the same number West Seattle buses carry today. So the \$6 billion for WSLE means that Sound Transit will be spending \$222,200 per rider to get a four-mile light rail spur into West Seattle. According to ST's first year ridership estimates – about 4 million, that price should drop to about \$1500 per rider. Do you really think that is a reasonable cost for public transit?

If so, you're telling your constituents in Pierce, King and Snohomish Counties that you're OK with a \$10 per rider Metro bus dropping passengers at a \$1500 per rider West Seattle rail station for a four mile trip downtown, so a \$10 per rider bus can pick them up at the other end.

That doesn't look like competent management, or a prudent use of taxpayer money. In November of 2017, your representative Cahill Ridge told the West Seattle Transportation Coalition that Sound Transit has no Plan B on this rail project. He was wrong. You board members have several Plans B, all less expensive, all less destructive and all lower carbon than light rail. Under Section Two of the ST3 package, you are obliged to reconsider any project that is unaffordable, unbuildable and/or infeasible. The WSLE light rail project is all three.

It doesn't matter how many years down the road you take a bad plan. It is still a bad plan that shouldn't proceed any further. So please, show your competence, reconsider this plan, and select a No Build option for it.

West Seattle Light Rail Environmental Impact Statement-Conclusion (EIS-C)

An independent assessment of the environmental impact
of the Sound Transit West Seattle-Link Extension (WSLE) light rail proposal

Submitted by Rethink The Link (RTTL) and Regional Transit Colleagues

Revision 4.1 September 24, 2024

Comments or Questions? Contact RTTL at email contact@rethinkthelink.org

Section 1: Executive Summary

The Ballard-West Seattle light rail discussion started from the premise that roadway-based modes could not handle peak period passenger demand in that corridor. Thus, in 2016, Sound Transit presented a Ballard-West Seattle link extension (WSBLE) light rail proposal in its ST3 transportation package. It offered simple criteria for voters to consider:

- improve public transit,
- encourage economic development, equity, community-building and social justice,
- protect the environment.

Sound Transit's January 2022 WSBLE Draft Environmental Impact Statement (DEIS) was designed to show that:

- these simple criteria would be satisfied, and
- WSBLE's proposed advantages would outweigh its disadvantages.

The DEIS combined both West Seattle and Ballard light rail segments into one project routed through downtown Seattle. But changes to the Ballard portion required additional work. So Sound Transit and the USDOT Federal Transit Administration decided to separate them into two projects, move forward with a separate environmental review for the West Seattle (WSLE) portion, and delay review for the Ballard portion.

Since then, independent transit experts have researched and analyzed information from the West Seattle sections of the WSBLE DEIS, public comments submitted about the DEIS, the Final EIS released September 20th, and additional public transit research findings. **Since the 2016 ST3 vote, Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE.** With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension (WSLE) does not satisfy the ST3 and DEIS criteria, and should not be built. The experts found that:

- WSLE transit times and therefore ridership will degrade, not improve West Seattle transit service after the WSLE and Ballard LE open in 2032 and 2042 respectively
- The construction generation of carbon will be more than carbon-reducing impacts of WSLE trains can mitigate over five future decades of WSLE operation.
- Acres of forest and habitat will be eliminated, and much more of it irreparably damaged
- Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network:

- Economic development in West Seattle and Chinatown-International District will be set back for at least a decade
- Equity, community-building and social justice will be set back at least a decade,
- And raising the question, based upon the newest, September 2024 WSLE cost estimate: “How can six to seven billion dollars be better spent to improve public transit?”

The Sound Transit Board can and should choose the No Build option for the WSLE.

- [Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016](#), allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.
- ST Executive Corridor Director Cahill Ridge’s told the November 2017 West Seattle Transportation Coalition public meeting that ST “has no Plan B” for WSLE if financial, disruptive technology or other factors arise. He was incorrect. ST has several Plan B options available.
- Lower carbon, less expensive and less destructive public transit options than WSLE are available and serving West Seattle riders better now than rail will in the future.
- No Build is a legitimate, legal, and responsible choice, included under federal and state law in all environmental reviews of large, disruptive transit construction projects. ST3 project sponsors can and should consider this option and should note that the facts overall point to selection of No Build.

This document addresses the West Seattle link extension specifically, and the WSBLE generally. It contributes summary information to the decision-making processes for:

- a. local and state government officials who regulate and influence Sound Transit decision making, and
- b. citizens who pay significant taxes (see “revenues vs. costs” below) to fund Sound Transit, in the expectation that their government will provide improved mobility services.
- c. Government decision makers who have to decide what the WSLE Record of Decision (ROD) will finally state as the result of the environmental process for WSLE.

Section 2: Current Transit Ridership and Forecasts for West Seattle-Downtown Corridor, and Region

- 1. The WSLE light rail plan will not improve transit or rider experience on the Downtown-West Seattle corridor. It will make them worse.**
 - a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though heavy traffic may cause it to take longer.
 - b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see “transfer penalty” in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer.
 - c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers.
- 2. Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.**

- a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.
 - b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)
 - i. The FEIS sorts ridership forecasts based on several options:
 - (a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built
 - (b) Two station scenario, without Avalon station
 - (c) Three station scenario with Delridge, Avalon and Junction stations
 - ii. Appendix 2 of [Sound Transit's Transportation Technical Report](#) shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.
 - c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day.
 - d. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.
 - i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix, **Per Capita Transit Ridership Is Declining**).
3. [Sound Transit is not building what voters approved as ST3 in 2016:](#)
- a. Voters are getting a different rail plan than Sound Transit presented as ST3 in 2016:
 - i. The original Ballard-West Seattle line (WSBLE) is now two separate lines – BLE and WSLE
 - ii. **The \$1.7 billion ST3 budget for WSLE is now \$6-\$7 billion.** Listed Rapid Ride corridor improvements have not been made, and its 2030 delivery date will not be met.
 - iii. The ST3 proposal did not describe Pigeon Point deforestation, "irreparable" habitat damage, or any notice of a large carbon footprint from construction as documented in earlier Sound Transit projects.
 - iv. Additional carbon and pollution generated from 5-8 years of traffic congestion is not specified in the DEIS but may be tallied in SDOT's (Seattle Dept. of Transportation) annual carbon assessment.
 - b. Since 2016, ST has altered proposed routes, plans, and station configurations without filing any DEIS amendments, or providing public notices as changes are made.
 - c. Though the Sound Transit Board of Directors has not approved a West Seattle route, Sound Transit is delivering notices of potential buyouts and teardowns to property owners along a "placeholder" route.

4. **Few people who voted for ST3 in 2016 understood the significant negative impacts of WSLE.**
 - a. Until 2015, Sound Transit's ST3 plans only included a light rail connection to Ballard.
 - b. Changing course in 2016, Sound Transit included a short light rail line to West Seattle in ST3. It promised that if voters approved ST3, bus and rapid transit service would be improved, and detailed light rail planning and public outreach would follow.
 - c. Few voters understood the negative impacts WSLE would have on their transit experiences, on the environment, and in losses of homes, businesses and jobs.

5. **Puget Sound Regional Council (PSRC) and Sound Transit data show that by 2050, light rail will only carry 3% of all regional trips, and buses only about 5% -- despite PSRC expecting 1.8 million more residents living in the Snohomish-King-Pierce region.**
 - a. PSRC expects buses and trains together will carry just 15% of trips in Seattle.
 - b. A government rationale for supporting WSLE is that transferring passengers onto the four-mile rail line will free buses it can redeploy for more frequent local service.
 - i. Data and experience, including "transfer penalty" and truncated bus routes, do not appear to support this rationale.
 - ii. Metro Transit stated to the West Seattle Transportation Coalition in 2014 that it will cancel a bus route costing more than \$7 per rider (about \$10 in 2024 dollars). The September 2024 WSLE cost estimate of \$6-\$7 billion to serve 27,000 riders, puts its per rider expenditure on 2032 opening day at \$222,000-\$260,000 per rider (see Economics 3.2.a. below).
 1. Using ST estimates of 4 million WSLE riders per year and adding \$40 million per year cost for operations and maintenance, reduces per rider cost to \$1500 for the first year, eventually plateauing at \$600 per rider in perpetuity.
 2. If rail does not replace bus, and per-trip cost from point A to point B is not reduced, moving riders from bus to rail is not beneficial. If only the rider's trip is measured, without including distance, the result may be misleading. For example:
 - a. Neither Metro Transit nor Sound Transit appear to have made cost-benefit calculations to assess the transit cost effectiveness of WSLE.
 - b. Metro's plan for WSLE to replace four miles of bus corridor means it will deliver \$10 /rider passengers to one station of a \$1500 /rider rail line, then use another \$10 /rider bus to pick up the portion of those riders who don't continue on rail.
 - c. Passengers who ride further on rail may also transfer to bus at the end of their rail segment.
 - iii. Electrification of the Metro bus fleet, and expansion of flexibly routed bus service that would connect riders more efficiently to destinations within and beyond West Seattle, would yield a far better cost-benefit ratio. It could be funded with a fraction of the \$6-\$7 billion estimated for a single, four-station WSLE route.

- iv. Improving bus service should also include City of Seattle exercising its municipal authority to eliminate road bottlenecks to give buses more priority in traffic.
6. **The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle corridor.**
- a. ST's WSLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service.
 - b. Presently, public and private roadway buses, vanpools and ride-share services can be programmed to carry more riders than light rail, often faster and less expensively. And their routes can be modified – unlike light rail -- as conditions change.
 - 1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers
 - 2. King County Metro:
 - a. is planning to transition its entire fleet of buses to electric power.
 - b. has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas.
7. **The light rail bridge – that has not yet been designed – would extend two miles from SODO over the Duwamish River. This presents the risks of rising expenses and construction delays, including:**
- a. No passenger railroad bridge of this length and height (160 feet) has ever been built.
 - b. The bridge will run over the [Seattle Fault earthquake and liquefaction zone](#).

Section 3: Economics

- 1. **At \$1.5 billion-\$1.75 billion per mile for 4 miles (Seattle Transit Blog), WSLE is the world's second-most expensive rail project**, behind NYC's subway upgrade (\$2.8 billion /mile), but a bit ahead of San Francisco's subway (\$920 million / mile)
- 2. **On opening day, WSLE will have cost up to \$260,000 per rider** (including construction, operations, and maintenance costs).
 - a. Depending on Sound Transit's amortization schedule for the \$6-\$7 billion WSLE construction expenditure plus interest payments, plus \$40 million estimated for annual WSLE operations & maintenance cost, overlaying annual ridership estimates of 4 million yields per rider cost ranging between \$600-\$1500.
 - b. In advocating for WSLE, Metro Transit is advocating to deliver \$10 per rider passengers to a \$1500 per rider WSLE train station, for a four mile rail ride to Seattle, where another \$10 per rider Metro bus will pick them up.
- 3. **WSLE may present revenue losses and opportunity costs for transit across the region (Snohomish, King, and Pierce counties), and for the key light rail city of Seattle.**

- a. While city and county revenues have decreased, Sound Transit will eliminate businesses, services and properties that pay into municipal tax rolls.
 - i. Neither ST, Seattle nor King County has run cost-benefit analyses to judge whether trading a decade's worth of WSLE-caused tax revenue losses for anticipated future revenue will pencil out – given that:
 - 1. Neither ST nor the City of Seattle has calculated what net economic benefits WSLE will create for West Seattle, the CID and SODO, and
 - 2. While light rail creates benefits in some areas, West Seattle commerce and real estate markets up to now have not significantly suffered, even during the pandemic.
 - b. **At least 70 West Seattle businesses and services will be forced to move or close, but the final number can't be determined until ST chooses a WSLE alignment.**
 - i. In West Seattle, 500-1000 jobs connected to displaced businesses and services will be lost. In SODO and Chinatown-International District areas, additional businesses will be displaced or close, and more jobs lost.
 - ii. The number of businesses displaced will depend on the WSLE alignment ST finally chooses. [West Seattle blogger Marie McKinsey](#) offered this list of possible business displacements, extending from Jefferson Square (37 closures) to Delridge (West Seattle Athletic Club, Uptown Espresso, Skylark Cafe), to West Marginal Way.
 - iii. Patronage estimates by affected businesses (e.g., 7-11, Taco Time, Starbucks) average 1000 customers per day, with more for larger enterprises (e.g., Trader Joe's, Safeway).
 - c. Rather than create an estimated \$6-\$7 billion in lost WSLE opportunity costs for Seattle and the region, the money could be better invested in other transit options within the WSLE corridor and beyond, yielding a lower carbon footprint, and fewer environmental, social and economic impacts.
4. **Freight, public transit, emergency services and commuters will be disrupted, and productivity impacted as West Seattle's main roads north and south of the WS high bridge are blocked during construction.**

Section 4: Local Environment and Global Climate

1. As climate change now worsens, Sound Transit forecasts in the FEIS that its construction of WSLE preferred alignment will create more carbon emissions than it can mitigate by attracting new riders, and expanding walkable, car-free urbanism near three new West Seattle light rail stations.

- a. Based on a technical re-calculation in the Final EIS Sound Transit has set the mitigation period of WSLE construction-generated carbon to at least 2080, even while reducing the originally stated 614,000 metric tons of greenhouse gases (GHG) (DEIS table 4.2.6-3) to 140,952 tons (FEIS table 4.6.3). The total carbon footprint, which is primarily embodied in production of concrete used to build structures and track ways, is still significant.
 - Sound Transit claims that operating WSLE (including heating, ventilation and air conditioning (HVAC)) will:

- a. generate 60 metric tons of carbon annually, kept low based on using 100% renewable energy for station operations
- b. displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032.
 - **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080.**
- b. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941 tons. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941 tons per year reduced, yields a payback period of 48 years – until the year 2080, to mitigate WSLE construction carbon.
- c. Table 4.6-1, "Regional Vehicle Miles Traveled and Average Daily Traffic Change," shows the Build option will only reduce car and light truck miles traveled by 0.02% compared to the No Build option (15,400 reduction from 85,366,700 vehicles total). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.
- d. **Sound Transit has not done a proper impact evaluation for light rail alignments and possible other modes.** This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.
- e. **The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.")**
 - TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...")
 - The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2,941 tons generated by the methodology Sound Transit uses in the WSLE FEIS.
 - This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly.
 - While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated.
- f. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.

- g. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's and King County's goals are to achieve carbon neutrality by 2050.
 - However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use.
 - As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day.
 - Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not.
- h. **The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated.** Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from [TreePAC.org](https://www.treepac.org/). Those trees would have absorbed an estimated 64,000 tons of carbon a year ([City of Seattle](#) & [One tree Planted](#)) – nearly half the carbon output from WSLE construction.

The City of Seattle can ill afford to lose tree canopy. Seattle has lost 255 acres of trees since 2017 (acreage cut by Sound Transit within city limits may be included in the Seattle count). Globally [in 2023, forests and other land ecosystems emitted almost as much carbon dioxide as they absorbed](#), due to fires, deforestation, and other factors.

- i. Eliminating acres of forest will exacerbate Seattle's heat islands, which are worst around light rail stations, areas where the city's commerce and employment are concentrated, and within its low income and of-color communities.
- j. The WSLE will eliminate three acres of north Pigeon Point Forest, plus 1-3 more acres of West Seattle green space, and beaver, salmon, heron and other species habitats there and on the Duwamish River and Longfellow Creek.
 - Sound Transit has not calculated costs for man-made elements to replace erosion control, storm water management, oxygen production, carbon sink, shade, and other ecosystem services provided by green infrastructure.
- k. As Sound Transit runs its modest program to replace trees it has eliminated, and Seattle's recent \$13 million in federal grants will fund planting trees in Delridge and the Chinatown International District, the two entities will simply be working back from the deficit ST will cause with WSLE.
- l. Replacing mature trees with saplings is what Nature does after a natural disaster. ST is imitating a natural disaster.

2. Under Washington's Climate Commitment Act (CCA), Sound Transit's claimed level of carbon emissions in the FEIS – 141,000 metric tons over five to six years of construction – qualify it as a "large quantity carbon emissions generator" (LQG). The LQG threshold is 25,000 metric tons of carbon per year.

- a. The best way to avoid emission is not to generate them (see **Minnesota** below).

- b. The WSLE DEIS does not address purchases of carbon offsets, or other high-quantity mitigation plans for this massive output.
- c. The Puget Sound Clean Air Agency's (PSCAA) analysis finds ". the Chinatown International District and Duwamish Valley neighborhoods facing disproportionate air pollution impacts, impacts from WSLE construction, and more sensitive health outcomes in the form of higher air quality-related hospitalizations."
- d. PSCAA AQ Director Kathy Strange commented in 2022 on Sound Transit's WSLE DEIS, that "...transportation emissions will be improved in the long-term because of light rail..." The data prove otherwise.
- e. Currently, [Minnesota is the only U.S. state holding its agencies accountable to its climate goals](#). A provision in its 2024 transportation law requires both state and municipal transportation planning agencies to take the state's climate goals into account when assessing new projects.

3. Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE.

Section 5: Equity

1. Sound Transit's WSLE proposal does not prioritize equity.

- a. The WSLE will serve the more affluent parts of West Seattle, while travel from less affluent, more diverse areas with more mobility disadvantaged citizens will require more transfers and take longer
- b. A "transfer penalty" will affect riders arriving at stations by bus at ground level. They must either ride or climb multiple levels up or down to reach a train. At the Junction station, walk time may add five minutes to the transfer, and the wait time for the next train may add another 10.
- c. Light rail will not improve access for residents who live in West Seattle's transit deserts (those lacking convenient access to transit within ¼ mile walk).
 - i. Metro buses re-deployed after the 2042 opening of WS-CID service will not deliver residents remaining in West Seattle to new locations of businesses and services WSLE will have displaced.
 - ii. WSLE will instead encourage more use of private vehicles to reach these locations.
- d. Elimination of the Frye Business Center and commercial properties to the north and south for construction of the Delridge and Avalon light rail stations will:
 - i. exacerbate the "food desert" of grocery and prepared food providers between North Delridge and California Ave SW, for the area's mixed demographic communities
 - ii. eliminate the walkable/15-minute Delridge-Avalon neighborhood, and deprive these communities of gathering places, and medical, social, business and recreational services

2. To make way for light rail, WSLE will eliminate over one hundred houses and apartments.

- a. The full number of residential buildings to be razed cannot be estimated, as Sound Transit has not chosen a final route. It will bulldoze everything from single houses in Delridge to 92 apartments in Jefferson Square. The Executive Summary of the WSLE FEIS indicates that the Preferred Alternative will require displacing 165 to 173 residential properties, and 132 to 133 businesses employing 1,230 people.
- b. Despite large numbers of new housing units and apartments built in West Seattle since 2014, rent and purchase costs have increased, not decreased. That has pushed out less wealthy residents (see *Seattle Times* May 12, 2024) and increased their needs to travel longer distances for work, shopping and entertainment, most often by car. Many have moved to other cities.
- c. Transit-oriented development (TOD -- dense housing, such as apartments, multiplexes, and ADUs) has been built along the Delridge, Avalon and East Junction bus routes of Rapid Ride H and C, and 21 and 128. Sound Transit will bulldoze a significant portion for the rail line, and not replace it for up to 10 years, further depriving West Seattle of affordable housing, while wasting public resources.

3. The Sound Transit Board has the authority to choose the No Build option for WSLE.

- a. Under Section 2 of the ST3 package that voters approved in 2016, the board must reconsider projects that are infeasible, unaffordable and/or unbuildable. WSLE is all three.
- b. Contrary to what regional and city leaders are saying, the WSBLE and WSLE light rail proposals can be re-considered, and better transit options can be chosen – under the No Build option
- c. No Build is a legitimate, legal, and responsible choice, which is included, under federal and state law, in all environmental reviews of large, disruptive transit construction projects. Based on the findings of the environmental process through this date, project sponsors should adopt the No Build option.
- d. The No Build option for WSLE will only affect the West Seattle corridor:
 - i. other ST3 projects could continue to be studied and implemented, as they are subject to a separate environmental process, and
 - ii. Sound Transit will still be able to get [Federal Capital Investment Grants](#) for non-light rail transit, and for expansion of high-capacity fixed-route bus transit.

Concluding Summary:

- 1. The Downtown-West Seattle (WSLE) light rail line should not be built (No Build option). Within the No Build option, the Ballard-Downtown segment should also be reconsidered.
- 2. Sound Transit's WSLE presents more disadvantages than advantages, including overwhelmingly negative social, economic and environmental impacts. As such, it fails to satisfy basic criteria set forth by ST3 and its FEIS for improving corridor transit. The costs, and negative environmental, economic and residential impacts of WSLE outweigh the benefits of building it
- 3. Current transit modes carry more passengers now, without transfers and wait times, than light rail promises to carry when completed. WSLE will degrade rather than improve the ridership experience.

4. The 146,000 tons of carbon that WSLE construction will generate – reduced from 614,000 tons in the Draft EIS -- plus elimination of and damage to acres of forest and habitat, will be more than the benefits of a short light rail line can mitigate through year 2105.
5. Choosing the light rail investment over more flexible, effective and cheaper transit modes presents opportunity costs for the City of Seattle, and the regional transit network.
6. Sound Transit can achieve better ridership by continuing to expand and electrify King County Metro and ST Regional Express bus services, on the West Seattle peninsula, W. Seattle-Downtown corridor, and beyond.

Any Sound Transit taxing district resident opposed to the construction of the West Seattle light rail extension has three paths of action:

1. Use emailtheboard@soundtransit.org to contact all board members. As 17 of its 18 members are elected officials, and accountable to voters, [each can be contacted directly](#) by their own constituents.
 - The Seattle members include City Council Member [Daniel Strauss](#), Mayor [Bruce Harrell](#), Council Member [Rob Saka](#) **, ST Board Chair [Dow Constantine](#) **, and King County Council Member [Girmay Zahilay](#). (** indicates lives in West Seattle). City Council Member Rob Saka chairs the City Council's Transportation Committee. [King County Council Member Teresa Mosqueda](#) also lives in West Seattle.
 - Include specific information from this document in messages to officials
 - Contact board and council members by letter, phone and email, and urge (or demand) that they:
 - Stand up for businesses, jobs, housing, communities, and the environment in Seattle.
 - Call for adopting the **No Build Option** still listed in the FEIS for WSLE and visible for years in the DEIS for WSBLE.
 - Require Sound Transit to consider cheaper, less destructive, lower carbon transit options for the Downtown-West Seattle corridor than rail.
 - Support using other modes, including buses, bus rapid transit, and other transit service connections to the regional rail network
2. Contact Port of Seattle Commissioners [Fred Felleman](#), Commissioner-Secretary [Ryan Calkins](#), Commissioner-Vice President [Toshiko Hasegawa](#), Commissioner-President [Hamdi Mohamed](#), Regional Transportation Manager [Geraldine Poor](#), Chief of Staff [Aaron Pritchard](#), and management staff [LeeAnne Schirato](#), [Kathy Roeder](#) and [Sabrina Bolieu](#).
 - Ask them to object vigorously and officially to impacts the WSLE bridge will cause, and that the Port of Seattle has opposed, including obstruction of the East and West Duwamish waterways, impairment of maritime traffic and businesses, damage to the Duwamish River and Longfellow Creek ecosystems, and a huge carbon footprint.
3. Email local business organizations that will be affected:
 - * [West Seattle Chamber of Commerce](#)
 - * [West Seattle Junction Association](#)

Appendix

Additional Considerations from Research Literature

1. Consumer willingness to fund light rail development decreases as cost increases

[Economists at the Federal Reserve Bank of St Louis](#) showed that when consumers understand the actual costs of getting light-rail services, the amount is generally more than they are willing to pay.

Nationwide, annual light-rail operating costs (\$778.3 million) far exceed fare revenue (\$226.1 million). The balance (\$552.2 million) is paid for with tax dollars. Examples (see also Snohomish-King-Pierce below): Fare revenues cover only 28.2% of system operating costs for St. Louis, 19.4% for Baltimore and 21.4% for Buffalo. If construction costs are added, losses become so large, no light-rail system can possibly recoup its costs.

Based solely on dollar cost, economists at the Federal Reserve Bank of St. Louis suggest that annual light-rail subsidies in St. Louis could instead be used more efficiently to buy a hybrid Toyota Prius every five years and pay annual maintenance costs of \$6,000 for 7700 low-income transit riders – with minimal pollution increases, and only a 0.5 percent increase in traffic congestion. Funds would still be left for all other MetroLink riders to pay for ride-share and bus fares.

Houston: When [Houston Metro proposed the Purple line in 2008](#), it estimated a \$591 million cost, and 28,750 weekday riders. By September 2020, costs reached \$822 million, with daily expected ridership decreased to 5,230, meaning a per rider cost of about \$150,000 to build the Purple Line.

Snohomish-King-Pierce Counties:

1. [Sound Transit revenues do not cover its operating expenses](#)
 - a. Sound Transit farebox revenues in 2023 covered only 16% of Link light rail operating costs (lower than the 40% minimum policy threshold), 9% of ST Express bus operating costs (below the 20% threshold), and 7% of Sounder costs (below the 23% threshold).
 - b. Revenue vs. cost gaps widen more when construction costs are added. Examples:
 - i. Adding together operations, maintenance and construction costs, light rail fare revenues cover less than 3%.
 - ii. For Sounder North commuter rail, ST over-estimated ridership by 90%, and underestimated total costs vs. farebox revenue by 95%.
 - c. As regional revenues will never cover or recoup its full costs, Sound Transit must add millions of dollars in federal grants and borrowed money to cover them.

2. Station development does not generally benefit low-income transit users

A [2019 University of Houston study](#) finds mixed effects on the welfare of neighborhoods after light rail construction. Researchers estimated an \$11,000 average increase in median income for neighborhoods near the new rail line development; but most gains go to high-income neighborhoods, while low-income neighborhoods see their income decline. The observed income polarization may be explained by poverty magnet and gentrification effects occurring simultaneously across the treated neighborhoods.

Light Rail Transit (LRT) does not appear to consistently deliver on its progressive policy goals of alleviating labor-skill mismatch, creating time cost savings, and increasing income mobility.

3. Light rail development does not reduce congestion

[Los Angeles: While light rail investments may increase transit accessibility and ridership within high-demand corridors, it does not reduce congestion.](#)

4. Per Capita Transit Ridership Is Declining

[Since 2013, U.S. transit ridership has declined, despite continued growth in population.](#)

Ridership has peaked and decreased seven different times since 1980, but overall, transit ridership per capita has decreased by nearly 15%. Researchers are evaluating economic considerations, fuel price, changing modal choices, and other areas as possible causes for the decline.

Demographic trends help to explain declining transit usage:

a. The U.S. [population is aging](#). While young age cohorts have a higher propensity for transit use, they represent a lower share of the population.

b. Simultaneously, significant population declines in some of the counties with high-quality transit service and use is being mirrored by population growth in counties with lower levels of transit service and use. Rapidly growing counties had half the rate of commuting to work by transit as did rapidly declining counties.

c. [Over 90% of U.S. population growth in 2023 occurred outside of its 124 largest cities.](#)

Among the 124 cities that the U.S. Census Bureau reports with populations over 200,000, about a third have lost population except 14 over 200,000 populations cities in Texas, and nine in Florida. Medium-sized cities in Florida, the Carolinas, and Las Vegas suburbs also added to the population. Americans are presently trading dense, urban, transit-oriented cities for less expensive, more spacious living elsewhere. How this will play out in transit development and politics are key questions.

5. Public transit is losing its customer base

During the pandemic, people formed new mobility habits, and most are not returning to regular use of urban buses and trains. In a 2022 survey of 38 transit agencies worldwide, researchers found a 10% loss in the transit customer base, as reported by the [International Association of Public Transit](#).

As of spring 2024, Sound Transit has not yet consistently reached its original 2010 light rail ridership target to the University District, even including the extension to Northgate, according to the U.S. Federal Transit Administration's National Transit Database (NTD). ST's original goal was an average of 2.7 million boardings per month. While it has touched that level in a few months since 2018, such as for Taylor Swift events in SODO, this ridership level has not been reached on average in 2024. Across all central Puget Sound transit agencies, NTD reports transit ridership as of April 2024 was 30% lower than in pre-pandemic 2019.

6. City of Seattle critique of ST3 DEIS (quote of excerpts):

- Sound Transit is considering cost savings refinements in response to its 2021 ST3 Realignment. Some of these proposed strategies are drastic.
 - We discourage scope reductions that do not bring commensurate benefit to the system and its riders, and that are not consistent with what was committed to voters.
 - We do not support strategies that would reduce access to the system.
- The City supports studying refinements that help control costs and provide meaningful benefits to local communities and the broader transit system and its riders, including:
 - Mix-and-match refinements for flexibility to choose segment alternatives that provide greatest benefit or fewest impacts;
 - Refinements to stations that would improve safe, non-motorized access;
 - Refinements that would avoid, minimize, or mitigate adverse project impacts.

7. Pandemic-caused vacancy rate increases in downtown areas

Between April 2019 and January 2023, [Seattle had the second-highest downtown commercial vacancy rate in the U.S. \(14.2%\)](#). [“Seattle's office vacancy rate reached 23.2% in July 2024, according to a recent report by Commercial Edge Research,](#) highlighting the city's struggle to adapt to post-pandemic market conditions,”

While Metro Transit ridership in 2024 has recovered to 75% of pre-COVID levels, full ridership recovery is questionable as work from home + hybrid structures continue, and central employment and commerce locations diversify from downtown Seattle.

8. Three factors drive excessive U.S. transit project costs

As Sound Transit cost overruns have been chronic, the [New York experience provides a cautionary tale](#) about how to structure transit projects, and how to avoid pitfalls.

Factors that add approximately 85% to costs include extra money going to red tape, wasted contingencies, paying workers during delays, defensive design, and profit. Specifically, the factors include:

- Lack of design standardization: this leads to fewer economies of scale, the inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process.
- Labor: 40-60% of the project's hard costs in the U.S. Labor costs in low-cost cases: Turkey, Italy, and Sweden are in the 19-30% range; Sweden, the highest-wage case among them, is 23%.
- U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The WSLE FEIS shows it will only carry 27,000 riders per day in 2032 — the same number West Seattle Metro buses carry today. In 2014, your Metro Transit representative Chris Arkills told the West Seattle Transportation Coalition that it will cancel a bus route if it costs more than \$7 per rider (that's about \$10 in 2024 dollars). So at \$6 billion for WSLE, Sound Transit will be spending \$222,200 per rider to get a four-mile light rail spur into West Seattle. According to ST's first year ridership estimates — about 4 million, that price should drop to about \$1500 per rider. Do you really think that is a reasonable cost to pay for public transit? If so, you're telling your constituents in Pierce, King and Snohomish Counties that you're OK with a \$10 per rider Metro bus dropping passengers at a \$1500 per rider West Seattle rail station, so they can take a four mile trip to downtown Seattle, and a \$10 per rider bus can pick them up at the other end. That doesn't look like competent management or prudent use of taxpayer dollars. It is time to stop and reconsider the WSLE plan.</p>	<p>The Sound Transit Board considers a number of factors in selecting the project to be built. Those factors include potential environmental impacts; equity; Tribe, agency, business, community organization, and public comments; cost; schedule; ridership; and potential long-term benefits.</p>

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Subject	WEST SEATTLE LINK EXTENSION LIGHT RAIL
From	Marilyn Kennell
To	Meeting Comments
Sent	Thursday, September 26, 2024 10:45 AM

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According to Sound Transit 3 – Section 2: plans can be changed if an element is **unaffordable**, **infeasible** and/or **unbuildable**. The **WSLE** light rail is all three.

Sound Transit’s WSLE Final EIS shows that the new WS light rail construction costs are now estimated to be \$7 BILLION!

That is almost 3 times the original budget and therefore unaffordable!

A new public vote is **NOT** required.

Vote for the **NO BUILD OPTION ON WSLE** light rail.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>According to Sound Transit 3 – Section 2: plans can be changed if an element is unaffordable, infeasible and/or unbuildable. The WSLE light rail is all three. (1) Sound Transit's WSLE Final EIS shows that the new WS light rail construction costs are 28-40% over budget. (2) and (3) No passenger railroad bridge has ever been built at the length and height ST proposes for its Duwamish River crossing. Sound Transit's other "never-been-done-before (light rail tracks over a floating bridge) I-90 project is a cautionary tale). A new public vote is NOT required.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Subject	Sound transit light rail west Seattle
From	Gale Sketchley
To	Meeting Comments
Sent	Wednesday, September 18, 2024 8:09 PM

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Please listen to the legitimate concerns from all those affected from the upheaval of traffic access, , to all displaced persons, and wrecking of homes and businesses. This is a mess. All in the name of something voted on in 2016. The no build option works. You must not be swayed by those few who may or not use the light rail. Consider the problem of getting to a station and the long time involved in trying to get to work. Just to name a dew problems. Metro busses work so much better and help those without a car. The moneys going to this project are outrageous.

Sent from my iPad

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Please listen to the legitimate concerns from all those affected from the upheaval of traffic access, , to all displaced persons, and wrecking of homes and businesses. This is a mess. All in the name of something voted on in 2016. The no build option works. You must not be swayed by those few who may or not use the light rail. Consider the problem of getting to a station and the long time involved in trying to get to work. Just to name a dew problems. Metro busses work so much better and help those without a car. The moneys going to this project are outrageous.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Subject	No Build Alternative
From	Clint Barefoot
To	Meeting Comments
Sent	Thursday, September 26, 2024 12:31 PM

[You don't often get email from cwbarefoot32@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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To whom it may concern, Board of Directors:

The West Seattle extension will displace homes and businesses in a way that will forever change a community in a very negative way. Many of us have found a very special and inclusive community here, and will be forced to leave Seattle entirely. The goal has become fiscally irresponsible as costs have increased in a major way since the initial proposal. The tax payers did not agree to these skyrocketing costs. Wasting tax payer money on a project that replaces a community of people with a loud, dirty monstrosity like this would be a real shame and I think the constituency would agree, if not now then over time. As a resident of this area for 13 years, I believe ridership will be minimal. Decisions like this, that deal with huge sums of monetary commitment and effect tax payers, both those who contribute to wasted projects and those forced to move to Colorado or other such places (and take their tax base with them), can devastate a community. I urge the board NOT to pursue this waste of a project.

Thank you for your consideration.
-Clint Barefoot

Sent from my iPhone

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The West Seattle extension will displace homes and businesses in a way that will forever change a community in a very negative way. Many of us have found a very special and inclusive community here, and will be forced to leave Seattle entirely. The goal has become fiscally irresponsible as costs have increased in a major way since the initial proposal. The tax payers did not agree to these skyrocketing costs. Wasting tax payer money on a project that replaces a community of people with a loud, dirty monstrosity like this would be a real shame and I think the constituency would agree, if not now then over time. As a resident of this area for 13 years, I believe ridership will be minimal. Decisions like this, that deal with huge sums of monetary commitment and effect tax payers, both those who contribute to wasted projects and those forced to move to Colorado or other such places (and take their tax base with them), can devastate a community. I urge the board NOT to pursue this waste of a project.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Subject	Comment for today's ST Board meeting from smartertransit.org
From	Maggie Fimia
To	Meeting Comments
Sent	Thursday, September 26, 2024 11:20 AM

You don't often get email from mfimia@zipcon.com. [Learn why this is important](#)

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9.26.24 Testimony to the ST Board from smartertransit.org

After last week’s announcement that the West Seattle light rail extension is now close to \$7 billion, we are hoping that the Board will do the right thing and look at other truly viable alternatives that could be completed for a fraction of the cost and available in a few months or years vs. decades.

We strongly recommend that you add this friendly amendment to M2024-59 regarding the “Work Plan”:

The workplan will identify risks to timely completion of other projects in the ST3 plan and update ridership forecasts to reflect post-COVID trends in travel behavior and development patterns. To further inform board decisions, the CEO is directed to present analysis of a Bus Rapid Transit service for West Seattle, similar to the existing Metro RapidRide “C” line, that could be implemented as a temporary or permanent alternative to the proposed light rail extension. This analysis is to include estimates of capital costs, operating cost per rider, and a timeline for implementation.

There are two ways for public officials to make decisions, a control model or a collaborative model. The control model is the one used by lawyers in a courtroom. They know the outcome they want and gear all their information to get to that outcome. The collaborative model is the one we should use to decide public policy. It begins by getting agreement on, What is the problem we are trying to solve? Followed by, what are the viable alternatives for solving it? And finally, what are the costs and benefits of those alternatives?

Continuing to push for an alternative that brings very little new ridership and damages so many homes, businesses and the environment only fuels those who want to dismantle all government programs. Please do the right thing and put the brakes on this West Seattle extension.

Thank you,
Maggie Fimia, Co-Chair smartertransit.org

A Citizen’s Toolkit, For Repairing or Building a Democracy

<https://maggiefimia.com>

<https://www.linkedin.com/in/margaret-maggie-fimia-094444/>

<https://www.facebook.com/profile.php?id=100084914897899>

Smarter Transit

<https://smartertransit.org>

Mountlake Terrace WA

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>After last week's announcement that the West Seattle light rail extension is now close to \$7 billion, we are hoping that the Board will do the right thing and look at other truly viable alternatives that could be completed for a fraction of the cost and available in a few months or years vs. decades. We strongly recommend that you add this friendly amendment to M2024-59 regarding the "Work Plan": The workplan will identify risks to timely completion of other projects in the ST3 plan and update ridership forecasts to reflect post-COVID trends in travel behavior and development patterns. To further inform board decisions, the CEO is directed to present analysis of a Bus Rapid Transit service for West Seattle, similar to the existing Metro RapidRide "C" line, that could be implemented as a temporary or permanent alternative to the proposed light rail extension. This analysis is to include estimates of capital costs, operating cost per rider, and a timeline for implementation. There are two ways for public officials to make decisions, a control model or a collaborative model. The control model is the one used by lawyers in a courtroom. They know the outcome they want and gear all their information to get to that outcome. The collaborative model is the one we should use to decide public policy. It begins by getting agreement on, What is the problem we are trying to solve? Followed by, what are the viable alternatives for solving it? And finally, what are the costs and benefits of those alternatives? Continuing to push for an alternative that brings very little new ridership and damages so many homes, businesses and the environment only fuels those who want to dismantle all government programs. Please do the right thing and put the brakes on this West Seattle extension.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension. The purpose of the West Seattle Link Extension includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> • Provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan. • Connect regional centers as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's Regional Transit Long-Range Plan (2014). • Implement a system that is technically and financially feasible to build, operate, and maintain. <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>

Subject	Light rail no build
From	Gale Sketchley
To	Meeting Comments
Sent	Thursday, September 26, 2024 10:54 AM

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We do not need light rail No build is the only sane option. You would wreak havoc on West Seattle residents trying to navigate around junction and bridge access. Consider the escape route to downtown on highland park way to avoid this. It would be a mess and backups from people trying to go downtown. No Build!!!
Sent from my iPad

Appendix C. Comments Received on the Final EIS and Responses

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1	We do not need light rail No build is the only sane option. You would wreak havoc on West Seattle residents trying to navigate around junction and bridge access. Consider the escape route to downtown on highland park way to avoid this. It would be a mess and backups from people trying to go downtown. No Build!!!	Your support for the No Build Alternative has been noted.

Subject	WEST SEATTLE LINK EXTENSION LIGHT RAIL
From	Marilyn Kennell
To	Meeting Comments
Sent	Thursday, September 26, 2024 10:45 AM

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According to Sound Transit 3 – Section 2: plans can be changed if an element is **unaffordable**, **infeasible** and/or **unbuildable**. The WSLE light rail is all three.

Sound Transit’s WSLE Final EIS shows that the new WS light rail construction costs are now estimated to be \$7 BILLION!

That is almost 3 times the original budget and therefore unaffordable!

A new public vote is **NOT** required.

Vote for the **NO BUILD OPTION ON WSLE** light rail.

Appendix C. Comments Received on the Final EIS and Responses

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1	<p>According to Sound Transit 3 – Section 2: plans can be changed if an element is unaffordable, infeasible and/or unbuildable. The WSLE light rail is all three.</p> <p>Sound Transit's WSLE Final EIS shows that the new WS light rail construction costs are now estimated to be \$7 BILLION!</p> <p>That is almost 3 times the original budget and therefore unaffordable!</p> <p>A new public vote is NOT required.</p> <p>Vote for the NO BUILD OPTION ON WSLE light rail.</p>	<p>Your support for the No Build Alternative has been noted.</p>

Subject	Motion No. M2024-59
From	jan roberts
To	Meeting Comments
Sent	Thursday, September 26, 2024 9:12 AM

You don't often get email from jan.roberts77@gmail.com. [Learn why this is important](#)

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Motion No. M2024-59

It's time to explore the No Build Option.

While expanding the Sound Transit light rail to West Seattle presents an attractive vision of modern urban transit, the practical advantages of Bus Rapid Transit make it a more favorable option. BRT's cost-effectiveness, flexibility, rapid implementation, minimal community disruption, and environmental benefits collectively support its prioritization. By choosing BRT, West Seattle can more efficiently and effectively address its transit challenges, providing immediate benefits to commuters and paving the way for a more sustainable and adaptable future.

- Save Costs
- Save Businesses
- Save Homes
- Save the Environment
- Save jobs
- Serve all transit-dependent areas
- Save 4-5 years of major construction

Jan Roberts
West Seattle resident
206 920 0130

Appendix C. Comments Received on the Final EIS and Responses

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1	<p>It's time to explore the No Build Option.</p> <p>While expanding the Sound Transit light rail to West Seattle presents an attractive vision of modern urban transit, the practical advantages of Bus Rapid Transit make it a more favorable option. BRT's cost-effectiveness, flexibility, rapid implementation, minimal community disruption, and environmental benefits collectively support its prioritization. By choosing BRT, West Seattle can more efficiently and effectively address its transit challenges, providing immediate benefits to commuters and paving the way for a more sustainable and adaptable future.</p> <p>? Save Costs</p> <p>? Save Businesses</p> <p>? Save Homes</p> <p>? Save the Environment</p> <p>? Save jobs</p> <p>? Serve all transit-dependent areas</p> <p>? Save 4-5 years of major construction</p>	<p>Your support for the No Build Alternative has been noted.</p> <p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>

Subject	September ST Board Comments
From	Stephen A. Fesler
To	Meeting Comments
Sent	Thursday, September 26, 2024 8:39 AM

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the “fish” button in Outlook. Thank you! ST Information Security

Good afternoon. My name is Stephen Fesler. I think many of you know I'm a huge proponent of transit and transit expansion. I've followed Sound Transit and written about Sound Transit for years, and you know, I've largely been excited about the regional transit expansion that Sound Transit's been doing, but we are in a very difficult spot with ST3. Right now we're going to be talking about the West Seattle link extension and other ones as they move through the early planning process, which, mind you, is wild that we've taken this line to get through early planning.

But the sad news is that the West Seattle link extension is headed for just one singular year, another 77% cost increase, and that's on top of other substantial cost increases that are many times above the rate of inflation. These kinds of cost increases are really devastating news every time we get them, because these kinds of cost increases can only be absorbed by further delaying projects. Something clearly is very broken in our planning processes. And so it's certainly important that we have people like Terri Mastas on board. But you know, that's just not sufficient, when the reality is that this board ends up making really awful decisions along the way that set us up for these cost increases.

With the West Seattle link extension, we're FEISing this project with a medium tunnel that wasn't necessary. And you know, when you look at the numbers, it's very clear that doing an elevated alignment would have been far cheaper. Now the decks were set against that because the alignment option chosen was not to put it in the street, but to actually take other property needlessly along the way. That's just total malpractice, both in terms of this board's decision making, as well as Sound Transit staff and as consultants. Something's really broken there.

We're also probably going to see some pretty huge increases on the Ballard link extension, which are going to result in years of years, perhaps even decades of delays, since the project cost is almost set to double to \$20 billion.

But then we have projects like the Everett link extension, which is rightly elevated. But again, there were political decisions made by this board to not just do it elevated, but not do it in the street, and to essentially make super sprawling suburban stations. I don't know what we're doing there, but it's really bad when we're choosing to displace 100s (possibly 1,000s) of residents, jobs, and businesses on Broadway and in Casino Road. But on top of this, we're pursuing a deviation to Paine Field that is only going to poach riders from existing transit and not create any new transit riders, as your numbers show. I don't know what we're doing there.

Wishing that staff and consultants will fix this mess at the fully engineering and bidding stage is fantasy. We're not going to cut these project costs in half because of exactly the design choices made by this board during the environmental review process. We're cursed to absorb these costs and inherent delays if we do not change tact on alternatives. My wish is that this board will change course, but I'm not optimistic that will happen.

Fundamentally, we have the ability to make good decisions as a region. But historically it has not come from this board, and sadly I don't think that this board is set up to the task of delivering ST3 in any of our lifetimes. Thus, I believe this situation is exactly why this board must be abolished and replaced by one that isn't designed for very poor political parochial outcomes. Otherwise, I fear that we are doomed to keep failing on ST3.

Appendix C. Comments Received on the Final EIS and Responses

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Sound Transit Projects

Details	Communication
#554788	Subject: 9/26/2024 Board of Directors Meeting
Date Recieved: 9/26/2024	From: Johannes Heine To: Meeting Comments Sent: Thursday, September 26, 2024 1:11 PM
Created by: Joseph Dolejsi	Dear Sound Transit Board Members,
Audience:	I am writing to express my support for the "No Avalon Station" option in the West Seattle Link Extension (WSLE) project. While expanding light rail is critical, I believe the "No Avalon Station" option provides the most balanced and efficient solution for several key reasons:
Type of Draft EIS comment:	1. Minimized Displacements and Environmental Impact
Reach:	This option reduces residential and business displacements compared to alternatives, avoiding the disruption of up to 606 residential units and 35 businesses, and protecting parkland . It minimizes social and environmental upheaval in our community.
Participation:	
Engagement:	2. Cost Efficiency
Source:	The project cost has already escalated to \$6.7-\$7.1 billion, and removing Avalon Station is a more cost-effective alternative. Fewer stations reduce complexity and help manage the project's overall costs .
Assigned division:	
Category:	3. Sufficient Transit Coverage
Project Phase: Planning	The proximity of Delridge and Alaska Junction Stations will still provide excellent access to the Avalon neighborhood without the need for another stop. Improved bus-rail integration will support connectivity .
Project Segment: West Seattle and Ballard: West Seattle	4. Less Construction Disruption Removing Avalon Station reduces construction impacts, particularly along Fauntleroy Way and 35th Ave SW, minimizing disruptions to businesses and traffic .
Environmental phase: Final EIS	Overall, the "No Avalon Station" option strikes the right balance between providing effective transit service, controlling costs, and minimizing impacts. I urge you to support this alternative. Thank you for your time and consideration. Johannes Heine

Appendix C. Comments Received on the Final EIS and Responses

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1	<p>I am writing to express my support for the “No Avalon Station” option in the West Seattle Link Extension (WSLE) project. While expanding light rail is critical, I believe the “No Avalon Station” option provides the most balanced and efficient solution for several key reasons:</p> <p>1. Minimized Displacements and Environmental Impact</p> <p>This option reduces residential and business displacements compared to alternatives, avoiding the disruption of up to 606 residential units and 35 businesses, and protecting parkland. It minimizes social and environmental upheaval in our community.</p> <p>2. Cost Efficiency</p> <p>The project cost has already escalated to \$6.7-\$7.1 billion, and removing Avalon Station is a more cost-effective alternative. Fewer stations reduce complexity and help manage the project’s overall costs.</p> <p>3. Sufficient Transit Coverage</p> <p>The proximity of Delridge and Alaska Junction Stations will still provide excellent access to the Avalon neighborhood without the need for another stop. Improved bus-rail integration will support connectivity.</p> <p>4. Less Construction Disruption</p> <p>Removing Avalon Station reduces construction impacts, particularly along Fauntleroy Way and 35th Ave SW, minimizing disruptions to businesses and traffic. Overall, the “No Avalon Station” option strikes the right balance between providing effective transit service, controlling costs, and minimizing impacts. I urge you to support this alternative.</p>	<p>Your support for Alternatives DEL-7 and WSJ-6 has been noted.</p>

ST3 West Seattle link extension, no build	
From	Luz Barefoot
To	Meeting Comments
Sent	Thursday, September 26, 2024 1:06 PM

My name is Lucy Barefoot, resident of the Avalon neighborhood in West Seattle for 10 yrs. My husband and I are first time owners in this area and will hate to see our neighborhood plowed thru to make room for a link extension that: is not affordable, a station that does not make sense for minimum ridership. Instead, consider the NO BUILD option and put resources in current transportation options with Metro.

This decision must not be taking lightly as you take financially responsible decisions. As a voter and past supporter of ST3, I remind you that the WSLink should not be prioritize as it does not make sense for this region and at a skyrocketing price tag. Again, voters did not give you a blank check you can easily justify for this extension.

Lucy Barefoot.

Appendix C. Comments Received on the Final EIS and Responses

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From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- FEIS re: Data calls FTA to reconsider supporting Sound Transit's WSLE
Date: Wednesday, November 27, 2024 9:38:17 AM
Attachments: [Final RethinkTheLink, Environmental Conclusion, Sept 24, 2024, Version 4.1.docx](#)

From: MartinWesterman <artartart@seanet.com>
Sent: Friday, September 27, 2024 1:38 PM
To: Fletcher, Susan (FTA) <susan.fletcher@dot.gov>
Cc: Rastelli, Scot (FTA) <Scot.Rastelli@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; Swaby, Howard (FTA) <howard.swaby@dot.gov>; Stojak, Mark (FTA) <mark.stojak@dot.gov>; Ziglar, Kristine (FTA) <Kristine.Ziglar@dot.gov>; Berkson, Rachel <Rachel.Berkson@mail.house.gov>
Subject: Re: FEIS re: Data calls FTA to reconsider supporting Sound Transit's WSLE

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Greetings Madame Administrator, Directors and Specialists,

Since Sound Transit's nearly 1000-page West Seattle Link Extension FEIS, released Sept. 19, does not address most of the concerns raised by commenters on the 2022 Draft EIS, Rethink The Link and Regional Transit Partners have released a more accessible FEIS, attached here. Those raising DEIS concerns included the City of Seattle, Seattle Green Spaces Coalition, Chinatown-International District citizen groups, Uwajimaya, West Seattle businesses, West Seattle SkyLink, regional transit experts, and many others,

A non-profit, Transportation Choices Coalition, testified at Sound Transit's September 26, 2024, board meeting that price for a light rail project should be no object. Between Washington's powerful Congressional delegation able to funnel debt-relief capital infusions to Sound Transit, and the perpetual \$1780 per year in Sound Transit taxes that every Pierce, King and Snohomish county household has been paying since 2017, TCC believes money will be perpetually available for light rail projects.

Sound Transit reported being \$12 billion in debt in 2022, then recast its accounting to appear \$6 billion in debt. Now, it plans to spend \$6-\$7 billion on WSLE. At ST's September 19, 2024, board meeting, ST CEO Goran Sparrman and Deputy CEO of Megaproject Delivery Terri Mestas asserted that the new cost can be managed.

Again, opening day of WSLE, Sound Transit will have spent between \$222,000 and \$250,000 per rider to attract each rail passenger. Metro Transit will cancel a bus route if costs more than \$10 per rider. Eventually, with a 4 million rider per year Sound Transit forecast for WSLE, cost will plateau at about \$600 per rider. Where is FTA's limit on reasonable cost for delivering public transit?

Especially if that transit mode is predicted by 2050 to carry no more than 3% of regional ridership?

Looking forward to our team discussing this issue with you,

Martin Westerman / contact@rethinkthelink.org / 206-427-9039

RTTL and Regional Transit Partners

On Sep 23, 2024, at 3:45 PM, MartinWesterman <artartart@seanet.com> wrote:

Greetings Madame Administrator, Directors and Specialists,

We are encouraging you to suspend FTA's support for Sound Transit's Ballard-Downtown-West Seattle light rail proposal (WSBLE), until all costs, impacts and ridership data are reconsidered. The FEIS has just been issued, and the issues raised in the 2022 DEIS have not been addressed. Any move forward from here without reconsideration will look more like political expediency than wisdom,

Can the proposed \$5 billion budget for the Downtown-West Seattle segment (WSLE) be spent better to improve transit?

The FTA and UMTA have long expressed concerns over light rail's impact on transit costs:

- In 1986, UMTA Deputy Director Rick Setner told American Demographics Magazine that light rail was not flexible, it was cost prohibitive, and "If you have six miles to do, it makes no sense to build six miles of tunnel, track and wire." Yet, he said, "many city officials look at light rail as a panacea. It's new, it's glitzy, and they think it makes them a world class city."
- On May 18, 2010, USDOT Undersecretary, Peter Rogoff said that financial difficulties facing mass transit networks are partially due to an "unnecessary focus" on rail expansion over bus improvements. Using the flexibility of buses, "you can move a lot of people at very little cost compared to rail." Rogoff is also former CEO of Sound Transit.

Seattle [was fully served by rail 100 years ago](#), when 50 miles of interurban rail lines connected it to Everett in the north and Tacoma in the south, and its 70 miles of urban trolley and streetcar lines covered the city. That included 12 miles of track from downtown to West Seattle (WS), where it connected the northern and southern ends of the 10 square mile West Seattle (WS) peninsula. Then in the 1940s, Seattle tore it all out. Now Sound Transit is trying to recreate it.

In 2016, Sound Transit's ST3 transportation package laid out simple criteria for voters to approve:

- improve public transit and boost ridership,

protect the environment, and

- encourage economic development, equity, community-building and social justice.

In its 2022 DEIS, Sound Transit wanted to show that WSBLE offered more advantages than disadvantages. Instead, ST has shown the opposite is true. Neither WSBLE nor the Downtown-West Seattle segment satisfies ST3 and DEIS criteria. WSLE should not be built:

- WSLE transit times and therefore ridership will degrade rather than improve.
- Construction will generate 614,000 tons of carbon, more than WSLE trains can ever mitigate
- Acres of forest and habitat will be eliminated, much of it with irreparable damage
- Economic development will be set back for at least a decade
- Equity, community-building and social justice will be set back at least a decade.

As you may already know,

- Though light rail investments may increase transit and ridership within high-demand corridors, they do not reduce congestion in "sprawl" cities: (<https://transfersmagazine.org/magazine-article/issue-2/does-light-rail-reduce-traffic/>).
- Most median income gains near new rail line developments go to high-income neighborhoods, not low-income transit users: (<https://uh-ir.tdl.org/items/5f739132-7b70-4585-9884-fafa2b2634bd>):
- Per capita transit ridership is declining as mobility and commuting behavior shift away from traditional transportation modes: (<https://scitechdaily.com/environmental-trade-offs-of-autonomous-vehicles-convenience-will-likely-come-at-a-cost/>, 18 May 2021, and *Environmental Research Letters*, and [DOI: 10.1088/1748-9326/abf6f4](https://doi.org/10.1088/1748-9326/abf6f4)).
- U.S. transit ridership has declined since 2013, despite continued growth in population: (https://www.researchgate.net/publication/325906474_The_Effect_of_Demographic_Changes_on_Transit_Ridership_Trends)
- [Sound Transit revenues do not cover its operating expenses](#). When construction costs are added, investments will never be recouped.

Metro Transit in 2014 told the West Seattle Transportation Coalition citizen's group that it would cancel a bus route costing more than \$7 per rider (\$10 in 2024 dollars). Metro told WSTC in 2017 that the four-mile WSLE segment would free its buses from having to travel that corridor, and enable it to redeploy those buses for better local

service in West Seattle, downtown and beyond.

- Metro is basically advocating to transfer its \$10 per rider passengers in West Seattle onto WSLE, which will cost \$185,000 per rider on its opening day, then transfer that passenger back to a \$10 per rider Metro bus for further conveyance.
- Note: ST has reduced its WSLE ridership forecasts by 50% since 2015, from 58,000 /day then to 27,000 /day now, and ST has not hit its ridership projections since 2010. WSLE cost may drop to \$600 per rider after the first year if ST ridership projections are accurate.
- Cost per hour of user benefit is key to determining cost effectiveness.
 - After tallying operating, maintenance, and capital costs, and dividing by hours of benefit (travel time savings to existing and new riders, and net new riders), we get a result that may indicate that it may be beneficial to move people from bus to rail. That result will be misleading if the agency is only measuring a trip without including the full distance.

Beyond that, the Biden-Harris Administration is working to reduce U.S. carbon footprint. We expect USDOT (and UMTA and FTA) to be deeply engaged in this, both because the U.S. transportation sector generates about 31% of total U.S. energy-related carbon emissions, and because light rail construction generates more GhG than its running trains will ever mitigate:

- WSBLE construction will output about three million tons of carbon, plus more generated by traffic congested during 5-8 years of build-out
- WSLE construction will generate 614,000 tons of carbon, plus traffic congestion GhGs
- Data and experience show that Sound Transit's mitigation plan — shifting drivers from personal vehicles to trains, will not occur in quantities that will mitigate the carbon it has generated
- ST has exacerbated its mitigation failure by already having cut about 140 acres of forest for its north-south trunk line; trees that would have absorbed approximately four million tons of carbon per year. ST has not tallied deforestation and erased sequestration material.
 - Deforestation also makes Seattle's heat islands worse, particularly in lower income areas
- Further, under Washington State's Climate Commitment Act (CCA), Sound Transit's level of carbon emissions – 500,000-600,000 tons per year – qualify it as a “large quantity carbon emissions generator.” Yet ST is not being required to pay for investments in carbon sequestration, as other entities are under the law.

The Puget Sound Regional Council predicts that by 2050, light rail will carry less than 3% of regional trips, buses less than 5%. and combined, the two modes will carry no

more than 15% of Seattle trips. Unless FTA's ridership data and projections are more current than PSRC's, it would appear that FTA is supporting a \$4 billion investment in four miles of light rail that will not improve transit ridership.

In the 1980s, when the Shirley Highway HOV lanes in Northern Virginia were the busiest transit lanes in the U.S. outside of NYC, and carried more passengers than Chicago's Dan Ryan Expressway, UMTA approved Seattle's plan for a Third Ave. bus tunnel. Supporters expected it to help speed Metro Transit buses through downtown, improve bus service and rider experience, and reduce traffic congestion through downtown. Except for reducing traffic on a one-mile stretch of Third Avenue above the tunnel, none of the original expectations came true — even though it has now been converted to a bus-light rail tunnel. As part of WSLE, Sound Transit proposes to build a second tunnel, exclusively for light rail.

In 1988, Mr. Sentner said in some cities, light rail is appropriate, but in many more, it is cost prohibitive, has very limited application, or is not appropriate at all. "Instead of looking to be world class, cities should look to move people around," he said.

Currently between West Seattle and Downtown, riders can take a one seat, no transfer ride via bus. With light rail, they'll take a three seat, two-transfer ride over the same distance. A transit system can only be successful if it picks up people where they are, takes them where they want to go for a price they want, at time they want. With its transfer penalties and longer transit times, WSLE is not an option for success.

We would be happy to meet with you to discuss better transit options for Seattle's west side transit corridor.

All the best,
Martin Westerman and Regional Transit Partners

West Seattle Light Rail Environmental Impact Statement-Conclusion (EIS-C)

An independent assessment of the environmental impact
of the Sound Transit West Seattle-Link Extension (WSLE) light rail proposal

Submitted by Rethink The Link (RTTL) and Regional Transit Colleagues

Revision 4.1 September 24, 2024

Comments or Questions? Contact RTTL at email contact@rethinkthelink.org

Section 1: Executive Summary

The Ballard-West Seattle light rail discussion started from the premise that roadway-based modes could not handle peak period passenger demand in that corridor. Thus, in 2016, Sound Transit presented a Ballard-West Seattle link extension (WSBLE) light rail proposal in its ST3 transportation package. It offered simple criteria for voters to consider:

- improve public transit,
- encourage economic development, equity, community-building and social justice,
- protect the environment.

Sound Transit's January 2022 WSBLE Draft Environmental Impact Statement (DEIS) was designed to show that:

- these simple criteria would be satisfied, and
- WSBLE's proposed advantages would outweigh its disadvantages.

The DEIS combined both West Seattle and Ballard light rail segments into one project routed through downtown Seattle. But changes to the Ballard portion required additional work. So Sound Transit and the USDOT Federal Transit Administration decided to separate them into two projects, move forward with a separate environmental review for the West Seattle (WSLE) portion, and delay review for the Ballard portion.

Since then, independent transit experts have researched and analyzed information from the West Seattle sections of the WSBLE DEIS, public comments submitted about the DEIS, the Final EIS released September 20th, and additional public transit research findings. **Since the 2016 ST3 vote, Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE.** With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension (WSLE) does not satisfy the ST3 and DEIS criteria, and should not be built. The experts found that:

- WSLE transit times and therefore ridership will degrade, not improve West Seattle transit service after the WSLE and Ballard LE open in 2032 and 2042 respectively
- The construction generation of carbon will be more than carbon-reducing impacts of WSLE trains can mitigate over five future decades of WSLE operation.
- Acres of forest and habitat will be eliminated, and much more of it irreparably damaged
- Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network:

- Economic development in West Seattle and Chinatown-International District will be set back for at least a decade
- Equity, community-building and social justice will be set back at least a decade,
- And raising the question, based upon the newest, September 2024 WSLE cost estimate: “How can six to seven billion dollars be better spent to improve public transit?”

The Sound Transit Board can and should choose the No Build option for the WSLE.

- [Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016](#), allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.
- ST Executive Corridor Director Cahill Ridge’s told the November 2017 West Seattle Transportation Coalition public meeting that ST “has no Plan B” for WSLE if financial, disruptive technology or other factors arise. He was incorrect. ST has several Plan B options available.
- Lower carbon, less expensive and less destructive public transit options than WSLE are available and serving West Seattle riders better now than rail will in the future.
- No Build is a legitimate, legal, and responsible choice, included under federal and state law in all environmental reviews of large, disruptive transit construction projects. ST3 project sponsors can and should consider this option and should note that the facts overall point to selection of No Build.

This document addresses the West Seattle link extension specifically, and the WSBLE generally. It contributes summary information to the decision-making processes for:

- a. local and state government officials who regulate and influence Sound Transit decision making, and
- b. citizens who pay significant taxes (see “revenues vs. costs” below) to fund Sound Transit, in the expectation that their government will provide improved mobility services.
- c. Government decision makers who have to decide what the WSLE Record of Decision (ROD) will finally state as the result of the environmental process for WSLE.

Section 2: Current Transit Ridership and Forecasts for West Seattle-Downtown Corridor, and Region

- 1. The WSLE light rail plan will not improve transit or rider experience on the Downtown-West Seattle corridor. It will make them worse.**
 - a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though heavy traffic may cause it to take longer.
 - b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see “transfer penalty” in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer.
 - c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers.
- 2. Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.**

- a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.
 - b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)
 - i. The FEIS sorts ridership forecasts based on several options:
 - (a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built
 - (b) Two station scenario, without Avalon station
 - (c) Three station scenario with Delridge, Avalon and Junction stations
 - ii. Appendix 2 of [Sound Transit's Transportation Technical Report](#) shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.
 - c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day.
 - d. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.
 - i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix, **Per Capita Transit Ridership Is Declining**).
3. [Sound Transit is not building what voters approved as ST3 in 2016:](#)
- a. Voters are getting a different rail plan than Sound Transit presented as ST3 in 2016:
 - i. The original Ballard-West Seattle line (WSBLE) is now two separate lines – BLE and WSLE
 - ii. **The \$1.7 billion ST3 budget for WSLE is now \$6-\$7 billion.** Listed Rapid Ride corridor improvements have not been made, and its 2030 delivery date will not be met.
 - iii. The ST3 proposal did not describe Pigeon Point deforestation, "irreparable" habitat damage, or any notice of a large carbon footprint from construction as documented in earlier Sound Transit projects.
 - iv. Additional carbon and pollution generated from 5-8 years of traffic congestion is not specified in the DEIS but may be tallied in SDOT's (Seattle Dept. of Transportation) annual carbon assessment.
 - b. Since 2016, ST has altered proposed routes, plans, and station configurations without filing any DEIS amendments, or providing public notices as changes are made.
 - c. Though the Sound Transit Board of Directors has not approved a West Seattle route, Sound Transit is delivering notices of potential buyouts and teardowns to property owners along a "placeholder" route.

4. **Few people who voted for ST3 in 2016 understood the significant negative impacts of WSLE.**
 - a. Until 2015, Sound Transit's ST3 plans only included a light rail connection to Ballard.
 - b. Changing course in 2016, Sound Transit included a short light rail line to West Seattle in ST3. It promised that if voters approved ST3, bus and rapid transit service would be improved, and detailed light rail planning and public outreach would follow.
 - c. Few voters understood the negative impacts WSLE would have on their transit experiences, on the environment, and in losses of homes, businesses and jobs.

5. **Puget Sound Regional Council (PSRC) and Sound Transit data show that by 2050, light rail will only carry 3% of all regional trips, and buses only about 5% -- despite PSRC expecting 1.8 million more residents living in the Snohomish-King-Pierce region.**
 - a. PSRC expects buses and trains together will carry just 15% of trips in Seattle.
 - b. A government rationale for supporting WSLE is that transferring passengers onto the four-mile rail line will free buses it can redeploy for more frequent local service.
 - i. Data and experience, including "transfer penalty" and truncated bus routes, do not appear to support this rationale.
 - ii. Metro Transit stated to the West Seattle Transportation Coalition in 2014 that it will cancel a bus route costing more than \$7 per rider (about \$10 in 2024 dollars). The September 2024 WSLE cost estimate of \$6-\$7 billion to serve 27,000 riders, puts its per rider expenditure on 2032 opening day at \$222,000-\$260,000 per rider (see Economics 3.2.a. below).
 1. Using ST estimates of 4 million WSLE riders per year and adding \$40 million per year cost for operations and maintenance, reduces per rider cost to \$1500 for the first year, eventually plateauing at \$600 per rider in perpetuity.
 2. If rail does not replace bus, and per-trip cost from point A to point B is not reduced, moving riders from bus to rail is not beneficial. If only the rider's trip is measured, without including distance, the result may be misleading. For example:
 - a. Neither Metro Transit nor Sound Transit appear to have made cost-benefit calculations to assess the transit cost effectiveness of WSLE.
 - b. Metro's plan for WSLE to replace four miles of bus corridor means it will deliver \$10 /rider passengers to one station of a \$1500 /rider rail line, then use another \$10 /rider bus to pick up the portion of those riders who don't continue on rail.
 - c. Passengers who ride further on rail may also transfer to bus at the end of their rail segment.
 - iii. Electrification of the Metro bus fleet, and expansion of flexibly routed bus service that would connect riders more efficiently to destinations within and beyond West Seattle, would yield a far better cost-benefit ratio. It could be funded with a fraction of the \$6-\$7 billion estimated for a single, four-station WSLE route.

- iv. Improving bus service should also include City of Seattle exercising its municipal authority to eliminate road bottlenecks to give buses more priority in traffic.
6. **The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle corridor.**
- a. ST's WSLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service.
 - b. Presently, public and private roadway buses, vanpools and ride-share services can be programmed to carry more riders than light rail, often faster and less expensively. And their routes can be modified – unlike light rail -- as conditions change.
 - 1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers
 - 2. King County Metro:
 - a. is planning to transition its entire fleet of buses to electric power.
 - b. has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas.
7. **The light rail bridge – that has not yet been designed – would extend two miles from SODO over the Duwamish River. This presents the risks of rising expenses and construction delays, including:**
- a. No passenger railroad bridge of this length and height (160 feet) has ever been built.
 - b. The bridge will run over the [Seattle Fault earthquake and liquefaction zone](#).

Section 3: Economics

- 1. **At \$1.5 billion-\$1.75 billion per mile for 4 miles (Seattle Transit Blog), WSLE is the world's second-most expensive rail project**, behind NYC's subway upgrade (\$2.8 billion /mile), but a bit ahead of San Francisco's subway (\$920 million / mile)
- 2. **On opening day, WSLE will have cost up to \$260,000 per rider** (including construction, operations, and maintenance costs).
 - a. Depending on Sound Transit's amortization schedule for the \$6-\$7 billion WSLE construction expenditure plus interest payments, plus \$40 million estimated for annual WSLE operations & maintenance cost, overlaying annual ridership estimates of 4 million yields per rider cost ranging between \$600-\$1500.
 - b. In advocating for WSLE, Metro Transit is advocating to deliver \$10 per rider passengers to a \$1500 per rider WSLE train station, for a four mile rail ride to Seattle, where another \$10 per rider Metro bus will pick them up.
- 3. **WSLE may present revenue losses and opportunity costs for transit across the region (Snohomish, King, and Pierce counties), and for the key light rail city of Seattle.**

- a. While city and county revenues have decreased, Sound Transit will eliminate businesses, services and properties that pay into municipal tax rolls.
 - i. Neither ST, Seattle nor King County has run cost-benefit analyses to judge whether trading a decade's worth of WSLE-caused tax revenue losses for anticipated future revenue will pencil out – given that:
 - 1. Neither ST nor the City of Seattle has calculated what net economic benefits WSLE will create for West Seattle, the CID and SODO, and
 - 2. While light rail creates benefits in some areas, West Seattle commerce and real estate markets up to now have not significantly suffered, even during the pandemic.
 - b. **At least 70 West Seattle businesses and services will be forced to move or close, but the final number can't be determined until ST chooses a WSLE alignment.**
 - i. In West Seattle, 500-1000 jobs connected to displaced businesses and services will be lost. In SODO and Chinatown-International District areas, additional businesses will be displaced or close, and more jobs lost.
 - ii. The number of businesses displaced will depend on the WSLE alignment ST finally chooses. [West Seattle blogger Marie McKinsey](#) offered this list of possible business displacements, extending from Jefferson Square (37 closures) to Delridge (West Seattle Athletic Club, Uptown Espresso, Skylark Cafe), to West Marginal Way.
 - iii. Patronage estimates by affected businesses (e.g., 7-11, Taco Time, Starbucks) average 1000 customers per day, with more for larger enterprises (e.g., Trader Joe's, Safeway).
 - c. Rather than create an estimated \$6-\$7 billion in lost WSLE opportunity costs for Seattle and the region, the money could be better invested in other transit options within the WSLE corridor and beyond, yielding a lower carbon footprint, and fewer environmental, social and economic impacts.
4. **Freight, public transit, emergency services and commuters will be disrupted, and productivity impacted as West Seattle's main roads north and south of the WS high bridge are blocked during construction.**

Section 4: Local Environment and Global Climate

- 1. As climate change now worsens, Sound Transit forecasts in the FEIS that its construction of WSLE preferred alignment will create more carbon emissions than it can mitigate by attracting new riders, and expanding walkable, car-free urbanism near three new West Seattle light rail stations.**
- a. Based on a technical re-calculation in the Final EIS Sound Transit has set the mitigation period of WSLE construction-generated carbon to at least 2080, even while reducing the originally stated 614,000 metric tons of greenhouse gases (GHG) (DEIS table 4.2.6-3) to 140,952 tons (FEIS table 4.6.3). The total carbon footprint, which is primarily embodied in production of concrete used to build structures and track ways, is still significant.
 - Sound Transit claims that operating WSLE (including heating, ventilation and air conditioning (HVAC)) will:

- a. generate 60 metric tons of carbon annually, kept low based on using 100% renewable energy for station operations
- b. displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032.
 - **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080.**
- b. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941 tons. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941 tons per year reduced, yields a payback period of 48 years – until the year 2080, to mitigate WSLE construction carbon.
- c. Table 4.6-1, "Regional Vehicle Miles Traveled and Average Daily Traffic Change," shows the Build option will only reduce car and light truck miles traveled by 0.02% compared to the No Build option (15,400 reduction from 85,366,700 vehicles total). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.
- d. **Sound Transit has not done a proper impact evaluation for light rail alignments and possible other modes.** This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.
- e. **The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.")**
 - TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...")
 - The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2,941 tons generated by the methodology Sound Transit uses in the WSLE FEIS.
 - This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly.
 - While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated.
- f. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.

- g. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's and King County's goals are to achieve carbon neutrality by 2050.
 - However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use.
 - As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day.
 - Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not.
- h. **The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated.** Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from [TreePAC.org](https://www.treepac.org/). Those trees would have absorbed an estimated 64,000 tons of carbon a year ([City of Seattle](#) & [One tree Planted](#)) – nearly half the carbon output from WSLE construction.

The City of Seattle can ill afford to lose tree canopy. Seattle has lost 255 acres of trees since 2017 (acreage cut by Sound Transit within city limits may be included in the Seattle count). Globally [in 2023, forests and other land ecosystems emitted almost as much carbon dioxide as they absorbed](#), due to fires, deforestation, and other factors.

- i. Eliminating acres of forest will exacerbate Seattle's heat islands, which are worst around light rail stations, areas where the city's commerce and employment are concentrated, and within its low income and of-color communities.
- j. The WSLE will eliminate three acres of north Pigeon Point Forest, plus 1-3 more acres of West Seattle green space, and beaver, salmon, heron and other species habitats there and on the Duwamish River and Longfellow Creek.
 - Sound Transit has not calculated costs for man-made elements to replace erosion control, storm water management, oxygen production, carbon sink, shade, and other ecosystem services provided by green infrastructure.
- k. As Sound Transit runs its modest program to replace trees it has eliminated, and Seattle's recent \$13 million in federal grants will fund planting trees in Delridge and the Chinatown International District, the two entities will simply be working back from the deficit ST will cause with WSLE.
- l. Replacing mature trees with saplings is what Nature does after a natural disaster. ST is imitating a natural disaster.

2. Under Washington's Climate Commitment Act (CCA), Sound Transit's claimed level of carbon emissions in the FEIS – 141,000 metric tons over five to six years of construction – qualify it as a "large quantity carbon emissions generator" (LQG). The LQG threshold is 25,000 metric tons of carbon per year.

- a. The best way to avoid emission is not to generate them (see **Minnesota** below).

- b. The WSLE DEIS does not address purchases of carbon offsets, or other high-quantity mitigation plans for this massive output.
- c. The Puget Sound Clean Air Agency's (PSCAA) analysis finds ". the Chinatown International District and Duwamish Valley neighborhoods facing disproportionate air pollution impacts, impacts from WSLE construction, and more sensitive health outcomes in the form of higher air quality-related hospitalizations."
- d. PSCAA AQ Director Kathy Strange commented in 2022 on Sound Transit's WSLE DEIS, that "...transportation emissions will be improved in the long-term because of light rail..." The data prove otherwise.
- e. Currently, [Minnesota is the only U.S. state holding its agencies accountable to its climate goals](#). A provision in its 2024 transportation law requires both state and municipal transportation planning agencies to take the state's climate goals into account when assessing new projects.

3. Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE.

Section 5: Equity

1. Sound Transit's WSLE proposal does not prioritize equity.

- a. The WSLE will serve the more affluent parts of West Seattle, while travel from less affluent, more diverse areas with more mobility disadvantaged citizens will require more transfers and take longer
- b. A "transfer penalty" will affect riders arriving at stations by bus at ground level. They must either ride or climb multiple levels up or down to reach a train. At the Junction station, walk time may add five minutes to the transfer, and the wait time for the next train may add another 10.
- c. Light rail will not improve access for residents who live in West Seattle's transit deserts (those lacking convenient access to transit within ¼ mile walk).
 - i. Metro buses re-deployed after the 2042 opening of WS-CID service will not deliver residents remaining in West Seattle to new locations of businesses and services WSLE will have displaced.
 - ii. WSLE will instead encourage more use of private vehicles to reach these locations.
- d. Elimination of the Frye Business Center and commercial properties to the north and south for construction of the Delridge and Avalon light rail stations will:
 - i. exacerbate the "food desert" of grocery and prepared food providers between North Delridge and California Ave SW, for the area's mixed demographic communities
 - ii. eliminate the walkable/15-minute Delridge-Avalon neighborhood, and deprive these communities of gathering places, and medical, social, business and recreational services

2. To make way for light rail, WSLE will eliminate over one hundred houses and apartments.

- a. The full number of residential buildings to be razed cannot be estimated, as Sound Transit has not chosen a final route. It will bulldoze everything from single houses in Delridge to 92 apartments in Jefferson Square. The Executive Summary of the WSLE FEIS indicates that the Preferred Alternative will require displacing 165 to 173 residential properties, and 132 to 133 businesses employing 1,230 people.
- b. Despite large numbers of new housing units and apartments built in West Seattle since 2014, rent and purchase costs have increased, not decreased. That has pushed out less wealthy residents (see *Seattle Times* May 12, 2024) and increased their needs to travel longer distances for work, shopping and entertainment, most often by car. Many have moved to other cities.
- c. Transit-oriented development (TOD -- dense housing, such as apartments, multiplexes, and ADUs) has been built along the Delridge, Avalon and East Junction bus routes of Rapid Ride H and C, and 21 and 128. Sound Transit will bulldoze a significant portion for the rail line, and not replace it for up to 10 years, further depriving West Seattle of affordable housing, while wasting public resources.

3. The Sound Transit Board has the authority to choose the No Build option for WSLE.

- a. Under Section 2 of the ST3 package that voters approved in 2016, the board must reconsider projects that are infeasible, unaffordable and/or unbuildable. WSLE is all three.
- b. Contrary to what regional and city leaders are saying, the WSBLE and WSLE light rail proposals can be re-considered, and better transit options can be chosen – under the No Build option
- c. No Build is a legitimate, legal, and responsible choice, which is included, under federal and state law, in all environmental reviews of large, disruptive transit construction projects. Based on the findings of the environmental process through this date, project sponsors should adopt the No Build option.
- d. The No Build option for WSLE will only affect the West Seattle corridor:
 - i. other ST3 projects could continue to be studied and implemented, as they are subject to a separate environmental process, and
 - ii. Sound Transit will still be able to get [Federal Capital Investment Grants](#) for non-light rail transit, and for expansion of high-capacity fixed-route bus transit.

Concluding Summary:

- 1. The Downtown-West Seattle (WSLE) light rail line should not be built (No Build option). Within the No Build option, the Ballard-Downtown segment should also be reconsidered.
- 2. Sound Transit's WSLE presents more disadvantages than advantages, including overwhelmingly negative social, economic and environmental impacts. As such, it fails to satisfy basic criteria set forth by ST3 and its FEIS for improving corridor transit. The costs, and negative environmental, economic and residential impacts of WSLE outweigh the benefits of building it
- 3. Current transit modes carry more passengers now, without transfers and wait times, than light rail promises to carry when completed. WSLE will degrade rather than improve the ridership experience.

4. The 146,000 tons of carbon that WSLE construction will generate – reduced from 614,000 tons in the Draft EIS -- plus elimination of and damage to acres of forest and habitat, will be more than the benefits of a short light rail line can mitigate through year 2105.
5. Choosing the light rail investment over more flexible, effective and cheaper transit modes presents opportunity costs for the City of Seattle, and the regional transit network.
6. Sound Transit can achieve better ridership by continuing to expand and electrify King County Metro and ST Regional Express bus services, on the West Seattle peninsula, W. Seattle-Downtown corridor, and beyond.

Any Sound Transit taxing district resident opposed to the construction of the West Seattle light rail extension has three paths of action:

1. Use emailtheboard@soundtransit.org to contact all board members. As 17 of its 18 members are elected officials, and accountable to voters, [each can be contacted directly](#) by their own constituents.
 - The Seattle members include City Council Member [Daniel Strauss](#), Mayor [Bruce Harrell](#), Council Member [Rob Saka](#) **, ST Board Chair [Dow Constantine](#) **, and King County Council Member [Girmay Zahilay](#). (** indicates lives in West Seattle). City Council Member Rob Saka chairs the City Council's Transportation Committee. [King County Council Member Teresa Mosqueda](#) also lives in West Seattle.
 - Include specific information from this document in messages to officials
 - Contact board and council members by letter, phone and email, and urge (or demand) that they:
 - Stand up for businesses, jobs, housing, communities, and the environment in Seattle.
 - Call for adopting the **No Build Option** still listed in the FEIS for WSLE and visible for years in the DEIS for WSBLE.
 - Require Sound Transit to consider cheaper, less destructive, lower carbon transit options for the Downtown-West Seattle corridor than rail.
 - Support using other modes, including buses, bus rapid transit, and other transit service connections to the regional rail network
2. Contact Port of Seattle Commissioners [Fred Felleman](#), Commissioner-Secretary [Ryan Calkins](#), Commissioner-Vice President [Toshiko Hasegawa](#), Commissioner-President [Hamdi Mohamed](#), Regional Transportation Manager [Geraldine Poor](#), Chief of Staff [Aaron Pritchard](#), and management staff [LeeAnne Schirato](#), [Kathy Roeder](#) and [Sabrina Bolieu](#).
 - Ask them to object vigorously and officially to impacts the WSLE bridge will cause, and that the Port of Seattle has opposed, including obstruction of the East and West Duwamish waterways, impairment of maritime traffic and businesses, damage to the Duwamish River and Longfellow Creek ecosystems, and a huge carbon footprint.
3. Email local business organizations that will be affected:
 - * [West Seattle Chamber of Commerce](#)
 - * [West Seattle Junction Association](#)

Appendix

Additional Considerations from Research Literature

1. Consumer willingness to fund light rail development decreases as cost increases

[Economists at the Federal Reserve Bank of St Louis](#) showed that when consumers understand the actual costs of getting light-rail services, the amount is generally more than they are willing to pay.

Nationwide, annual light-rail operating costs (\$778.3 million) far exceed fare revenue (\$226.1 million). The balance (\$552.2 million) is paid for with tax dollars. Examples (see also Snohomish-King-Pierce below): Fare revenues cover only 28.2% of system operating costs for St. Louis, 19.4% for Baltimore and 21.4% for Buffalo. If construction costs are added, losses become so large, no light-rail system can possibly recoup its costs.

Based solely on dollar cost, economists at the Federal Reserve Bank of St. Louis suggest that annual light-rail subsidies in St. Louis could instead be used more efficiently to buy a hybrid Toyota Prius every five years and pay annual maintenance costs of \$6,000 for 7700 low-income transit riders – with minimal pollution increases, and only a 0.5 percent increase in traffic congestion. Funds would still be left for all other MetroLink riders to pay for ride-share and bus fares.

Houston: When [Houston Metro proposed the Purple line in 2008](#), it estimated a \$591 million cost, and 28,750 weekday riders. By September 2020, costs reached \$822 million, with daily expected ridership decreased to 5,230, meaning a per rider cost of about \$150,000 to build the Purple Line.

Snohomish-King-Pierce Counties:

1. [Sound Transit revenues do not cover its operating expenses](#)
 - a. Sound Transit farebox revenues in 2023 covered only 16% of Link light rail operating costs (lower than the 40% minimum policy threshold), 9% of ST Express bus operating costs (below the 20% threshold), and 7% of Sounder costs (below the 23% threshold).
 - b. Revenue vs. cost gaps widen more when construction costs are added. Examples:
 - i. Adding together operations, maintenance and construction costs, light rail fare revenues cover less than 3%.
 - ii. For Sounder North commuter rail, ST over-estimated ridership by 90%, and underestimated total costs vs. farebox revenue by 95%.
 - c. As regional revenues will never cover or recoup its full costs, Sound Transit must add millions of dollars in federal grants and borrowed money to cover them.

2. Station development does not generally benefit low-income transit users

A [2019 University of Houston study](#) finds mixed effects on the welfare of neighborhoods after light rail construction. Researchers estimated an \$11,000 average increase in median income for neighborhoods near the new rail line development; but most gains go to high-income neighborhoods, while low-income neighborhoods see their income decline. The observed income polarization may be explained by poverty magnet and gentrification effects occurring simultaneously across the treated neighborhoods.

Light Rail Transit (LRT) does not appear to consistently deliver on its progressive policy goals of alleviating labor-skill mismatch, creating time cost savings, and increasing income mobility.

3. Light rail development does not reduce congestion

[Los Angeles: While light rail investments may increase transit accessibility and ridership within high-demand corridors, it does not reduce congestion.](#)

4. Per Capita Transit Ridership Is Declining

[Since 2013, U.S. transit ridership has declined, despite continued growth in population.](#)

Ridership has peaked and decreased seven different times since 1980, but overall, transit ridership per capita has decreased by nearly 15%. Researchers are evaluating economic considerations, fuel price, changing modal choices, and other areas as possible causes for the decline.

Demographic trends help to explain declining transit usage:

a. The U.S. [population is aging](#). While young age cohorts have a higher propensity for transit use, they represent a lower share of the population.

b. Simultaneously, significant population declines in some of the counties with high-quality transit service and use is being mirrored by population growth in counties with lower levels of transit service and use. Rapidly growing counties had half the rate of commuting to work by transit as did rapidly declining counties.

c. [Over 90% of U.S. population growth in 2023 occurred outside of its 124 largest cities.](#)

Among the 124 cities that the U.S. Census Bureau reports with populations over 200,000, about a third have lost population except 14 over 200,000 populations cities in Texas, and nine in Florida. Medium-sized cities in Florida, the Carolinas, and Las Vegas suburbs also added to the population. Americans are presently trading dense, urban, transit-oriented cities for less expensive, more spacious living elsewhere. How this will play out in transit development and politics are key questions.

5. Public transit is losing its customer base

During the pandemic, people formed new mobility habits, and most are not returning to regular use of urban buses and trains. In a 2022 survey of 38 transit agencies worldwide, researchers found a 10% loss in the transit customer base, as reported by the [International Association of Public Transit](#).

As of spring 2024, Sound Transit has not yet consistently reached its original 2010 light rail ridership target to the University District, even including the extension to Northgate, according to the U.S. Federal Transit Administration's National Transit Database (NTD). ST's original goal was an average of 2.7 million boardings per month. While it has touched that level in a few months since 2018, such as for Taylor Swift events in SODO, this ridership level has not been reached on average in 2024. Across all central Puget Sound transit agencies, NTD reports transit ridership as of April 2024 was 30% lower than in pre-pandemic 2019.

6. City of Seattle critique of ST3 DEIS (quote of excerpts):

- Sound Transit is considering cost savings refinements in response to its 2021 ST3 Realignment. Some of these proposed strategies are drastic.
 - We discourage scope reductions that do not bring commensurate benefit to the system and its riders, and that are not consistent with what was committed to voters.
 - We do not support strategies that would reduce access to the system.
- The City supports studying refinements that help control costs and provide meaningful benefits to local communities and the broader transit system and its riders, including:
 - Mix-and-match refinements for flexibility to choose segment alternatives that provide greatest benefit or fewest impacts;
 - Refinements to stations that would improve safe, non-motorized access;
 - Refinements that would avoid, minimize, or mitigate adverse project impacts.

7. Pandemic-caused vacancy rate increases in downtown areas

Between April 2019 and January 2023, [Seattle had the second-highest downtown commercial vacancy rate in the U.S. \(14.2%\)](#). [“Seattle's office vacancy rate reached 23.2% in July 2024, according to a recent report by Commercial Edge Research,](#) highlighting the city's struggle to adapt to post-pandemic market conditions,”

While Metro Transit ridership in 2024 has recovered to 75% of pre-COVID levels, full ridership recovery is questionable as work from home + hybrid structures continue, and central employment and commerce locations diversify from downtown Seattle.

8. Three factors drive excessive U.S. transit project costs

As Sound Transit cost overruns have been chronic, the [New York experience provides a cautionary tale](#) about how to structure transit projects, and how to avoid pitfalls.

Factors that add approximately 85% to costs include extra money going to red tape, wasted contingencies, paying workers during delays, defensive design, and profit. Specifically, the factors include:

- Lack of design standardization: this leads to fewer economies of scale, the inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process.
- Labor: 40-60% of the project's hard costs in the U.S. Labor costs in low-cost cases: Turkey, Italy, and Sweden are in the 19-30% range; Sweden, the highest-wage case among them, is 23%.
- U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Again, opening day of WSLE, Sound Transit will have spent between \$222,000 and \$250,000 per rider to attract each rail passenger. Metro Transit will cancel a bus route if costs more than \$10 per rider. Eventually, with a 4 million rider per year Sound Transit forecast for WSLE, cost will plateau at about \$600 per rider. Where is FTA's limit on reasonable cost for delivering public transit? Especially if that transit mode is predicted by 2050 to carry no more than 3% of regional ridership?</p>	<p>The Sound Transit Board considers a number of factors in selecting the project to be built. Those factors include potential environmental impacts; equity; Tribe, agency, business, community organization, and public comments; cost; schedule; ridership; and potential long-term benefits.</p>
2	<p>Since the 2016 ST3 vote, Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE. With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension (WSLE) does not satisfy the ST3 and DEIS criteria, and should not be built. The experts found that:</p> <ul style="list-style-type: none"> • WSLE transit times and therefore ridership will degrade, not improve West Seattle transit service after the WSLE and Ballard LE open in 2032 and 2042 respectively • The construction generation of carbon will be more than carbon-reducing impacts of WSLE trains can mitigate over five future decades of WSLE operation. • Acres of forest and habitat will be eliminated, and much more of it irreparably damaged • Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network: • Economic development in West Seattle and Chinatown-International District will be set back for at least a decade • Equity, community-building and social justice will be set back at least a decade, • And raising the question, based upon the newest, September 2024 WSLE cost estimate: "How can six to seven billion dollars be better spent to improve public transit?" 	<p>Your support for the No Build Alternative has been noted.</p>
3	<p>Lower carbon, less expensive and less destructive public transit options than WSLE have been studied by Sound Transit, are available and serving West Seattle riders better now than rail will in the future.</p>	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
4	<p>1. The WSLE light rail plan will not improve transit or rider experience on the Downtown- West Seattle corridor. It will make them worse.</p> <ul style="list-style-type: none"> a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though heavy traffic may cause it to take longer. b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see "transfer penalty" in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer. c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers. <p>2. Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.</p> <ul style="list-style-type: none"> a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment. b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences) <ul style="list-style-type: none"> i. The FEIS sorts ridership forecasts based on several options: <ul style="list-style-type: none"> a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built b) Two station scenario, without Avalon station c) Three station scenario with Delridge, Avalon and Junction stations ii. Appendix 2 of Sound Transit's Transportation Technical Report shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares. c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day. d. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts. <ul style="list-style-type: none"> i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than 	<p>Chapter 3, Transportation Environment and Consequences, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) provides ridership forecasts and travel times.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	downtown Seattle (see Appendix,** Per Capita Transit Ridership Is Declining**).	
5	<p>The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle corridor.</p> <ol style="list-style-type: none"> a. ST's WSBLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service. b. Presently, public and private roadway buses, vanpools and ride-share services can be programmed to carry more riders than light rail, often faster and less expensively. And their routes can be modified - unlike light rail -- as conditions change. <ol style="list-style-type: none"> 1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers 2. King County Metro: <ol style="list-style-type: none"> a) is planning to transition its entire fleet of buses to electric power. b) has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas. 	<p>Refer to response to comment 3 regarding mode selection for the West Seattle Link Extension. A list of bus route service changes for each of the Build Alternatives is provided in Section 3.3.2, Build Alternatives, of Appendix N.1, Transportation Technical Report of the West Seattle Link Extension Final EIS. Bus service assumptions for both the No Build Alternative and Build Alternatives were developed by King County Metro Transit (Metro) and Sound Transit as part of Appendix B, Transit Service Integration Technical Memorandum, of Attachment N.1A, Transportation Technical Analysis Methodology, of Appendix N.1. Bus service would be restructured to integrate with the project, which would result in removing or truncating some lines but generally replacing them with reliable, high frequency light rail service. The bus service hours savings from removing or truncating routes would be redeployed elsewhere in accordance with Metro's service guidelines. The 2042 Build Alternatives assume there will be changes to bus service in the West Seattle Link Extension project corridor to integrate with the new light rail line. The service changes are based on Metro Connects and coordination with Metro regarding this project.</p>
6	<p>As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by attracting new riders, and expanding walkable, car-free urbanism near three new West Seattle light rail stations.</p> <ol style="list-style-type: none"> a. Based on a technical re-calculation in the Final EIS Sound Transit has set the mitigation period of WSLE construction-generated carbon to at least 2080, even while reducing the originally stated 614,000 metric tons of greenhouse gases (GHG) (DEIS table 4.2.6-3) to 140,952 tons (FEIS table 4.6.3). The total carbon footprint, which is primarily embodied in production of 	<p>Refer to Section 4.6, Air Quality, and Section 4.10, Energy Impacts, of the West Seattle Link Extension Final EIS for air quality and energy analyses. As described in Section 4.6.6.1.2, Construction Emissions, construction emissions were calculated using Federal Transit Administration's (FTA's) Transit Greenhouse Gas Estimator V3.0. Printouts of the results from this estimator are available</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>concrete used to build structures and track ways, is still significant.</p> <ul style="list-style-type: none"> • Sound Transit claims that operating WSLE (including heating, ventilation and air conditioning (HVAC)) will: <ul style="list-style-type: none"> a. generate 60 metric tons of carbon annually, kept low based on using 100% renewable energy for station operations b. displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032. <ul style="list-style-type: none"> ○ Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080. b. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941 tons. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941 tons per year reduced, yields a payback period of 48 years – until the year 2080, to mitigate WSLE construction carbon. c. Table 4.6-1, "Regional Vehicle Miles Traveled and Average Daily Traffic Change," shows the Build option will only reduce car and light truck miles traveled by 0.02% compared to the No Build option (15,400 reduction from 85,366,700 vehicles total). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic. d. Sound Transit has not done a proper impact evaluation for light rail alignments and possible other modes. This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington. e. The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.") <ul style="list-style-type: none"> • TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...") 	<p>in Appendix L4.6E, Greenhouse Gas Analysis. Section 4.6.6.1.2 also discusses the emerging nature of this field of analysis and provides additional context for interpreting these results.</p> <p>Refer to Appendix L4.6E for more information on the greenhouse gas emissions modeling.</p> <p>For more information on Sound Transit's environmental policy and sustainability initiatives, please visit Sound Transit's website at https://www.soundtransit.org/get-to-know-us/environment-sustainability.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<ul style="list-style-type: none"> The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2,941 tons generated by the methodology Sound Transit uses in the WSLE FEIS. This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly. While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile, -160 foot-tall, elevated light rail bridge has ever been built or fully calculated. <p>f. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.</p> <p>g. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's and King County's goals are to achieve carbon neutrality by 2050.</p> <ul style="list-style-type: none"> However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use. As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day. Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not. <p>The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated. Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from TreePAC.org. Those trees would have absorbed an estimated 64,000 tons of carbon a year (City of Seattle & One tree Planted)- nearly half the carbon output from WSBLE construction.</p>	

From: Matthew Maciejewski <mattmaci11@gmail.com>

Sent: Tuesday, October 8, 2024 8:38 PM

To: Meeting Comments <MeetingComments@soundtransit.org>; Swift, Lauren <lauren.swift@soundtransit.org>

Subject: West Seattle Rail WSJ-6 Alternative

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Hello,

I'm writing to vote for the WSJ-6 No Avalon Station Tunnel Alternative as opposed to the currently preferred WSJ-5b option. WSJ-6 is cheaper and causes far less disruption and displacements, while only lowering projected ridership by 100. A 1 station vs 2 station design has other benefits too - quicker trips to downtown from Junction, and lower maintenance costs.

Thanks,

Matt

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	I'm writing to vote for the WSJ-6 No Avalon Station Tunnel Alternative as opposed to the currently preferred WSJ-5b option. WSJ-6 is cheaper and causes far less disruption and displacements, while only lowering projected ridership by 100. A 1 station vs 2 station design has other benefits too - quicker trips to downtown from Junction, and lower maintenance costs.	Your support for Alternative WSJ-6 has been noted.

Subject	West Seattle Light Rail
From	Marsha Lubetkin
To	Email The Board
Sent	Sunday, September 29, 2024 4:38 PM

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Dear Sound Transit Board,

I would like to voice my opposition to the Sound Transit plan for West Seattle.

This project has ballooned to millions more dollars than what the voters approved 6 years ago. It will disrupt our life in West Seattle for years during construction. We all remember too well the chaos when the West Seattle Bridge was down for 2 years. Many businesses and homes will be destroyed, and if not torn down, businesses will be affected by all the construction and disruption. I

And for what? A 4-mile track to get us to SODO. We can easily get there by bus now. For a fraction of the cost for Sound Transit, we could improve our bus system and make it state-of-the-art.

I feel like we are barreling towards a really stupid decision. It feels like the wheels are already rolling and there is no stopping this. I really hope that is not the case. Please let's just use some common sense.

Let West Seattle stay the beautiful community it currently is. I'm not opposed to Light Rail, but I am opposed to it in West Seattle. It is not necessary to spend at least \$1,000,000,000 per mile to get us to SODO. Stop the madness please!

Sincerely,
MARSHA LUBETKIN

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I would like to voice my opposition to the Sound Transit plan for West Seattle.</p> <p>This project has ballooned to millions more dollars than what the voters approved 6 years ago. It will disrupt our life in West Seattle for years during construction. We all remember too well the chaos when the West Seattle Bridge was down for 2 years. Many businesses and homes will be destroyed, and if not torn down, businesses will be affected by all the construction and disruption. I</p> <p>And for what? A 4-mile track to get us to SODO. We can easily get there by bus now. For a fraction of the cost for Sound Transit, we could improve our bus system and make it state-of-the-art.</p> <p>I feel like we are barreling towards a really stupid decision. It feels like the wheels are already rolling and there is no stopping this. I really hope that is not the case. Please let's just use some common sense.</p> <p>Let West Seattle stay the beautiful community it currently is. I'm not opposed to Light Rail, but I am opposed to it in West Seattle. It is not necessary to spend at least \$1,000,000,000 per mile to get us to SODO.</p> <p>Stop the madness please!</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Sound Transit Projects

Details	Communication
<div>#554704</div> <div>Date Recieved: 9/30/2024</div> <div>Created by: Maddie Dewhirst</div> <div>Audience:</div> <div>Type of Draft</div> <div>EIS comment:</div> <div>Reach:</div> <div>Participation:</div> <div>Engagement:</div> <div>Source: Hotline</div> <div>Assigned division: Outreach</div> <div>Category:</div> <div>Project Phase: Planning</div> <div>Project Segment: West Seattle and Ballard: West Seattle</div> <div>Environmental phase:</div>	<div>Summary of voicemail:</div> <div>No idea why Sound Transit would want to destroy that much of West Seattle when they have the best bus service Donna has ever lived in. The buses go quite often and it would be from the same places they catch them right now so Donna doesn't understand why Sound Transit wants to destroy that many homes and businesses.</div>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	No idea why Sound Transit would want to destroy that much of West Seattle when they have the best bus service Donna has ever lived in. The buses go quite often and it would be from the same places they catch them right now so Donna doesn't understand why Sound Transit wants to destroy that many homes and businesses.	Your opposition to the West Seattle Link Extension has been noted.

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Hello Planning Committee Person,

I have lived on Delridge Way for decades. This neighborhood used to be a disconnected and often unsavory place. The West Seattle Athletic Club has been a powerful force for positive change.

Hundreds of us go here regularly and it has filled our lives with healthy habits and much healthier regard for self and others. We respect, like, and connect with our neighbors here. This place has cultivated *caring for ourselves and others*. It is of the utmost significance to protect and conserve this humanly beautiful place exactly where it is.

Thank you,

Erwin Galan

PS: when's the next public meeting?

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I have lived on Delridge Way for decades. This neighborhood used to be a disconnected and often unsavory place. The West Seattle Athletic Club has been a powerful force for positive change.</p> <p>Hundreds of us go here regularly and it has filled our lives with healthy habits and much healthier regard for self and others. We respect, like, and connect with our neighbors here.</p> <p>This place has cultivated caring for ourselves and others. It is of the utmost significance to protect and conserve this humanly beautiful place exactly where it is.</p>	Your comment has been noted.
2	PS: when's the next public meeting?	<p>Sound Transit will continue to coordinate with the community as design advances. Community events and meetings are posted to the project website</p> <p>https://www.soundtransit.org/system-expansion/west-seattle-link-extension.</p>

Subject	Please replace the West Seattle rail line with electric bus rapid transit
From	Eric Fisk
To	Email The Board
Sent	Tuesday, October 1, 2024 11:26 AM

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You are over 4x the cost of what voters approved. Cost per commuter is millions of dollars. It's time to be brave and rational. Thank you.

-eric fisk, 206-931-4629

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	You are over 4x the cost of what voters approved. Cost per commuter is millions of dollars. It's time to be brave and rational.	Your comment has been noted.

From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- Data calls FTA to reconsider support for Sound Transit's West Seattle-Ballard light rail
Date: Wednesday, November 27, 2024 9:32:12 AM

From: MartinWesterman <artartart@seanet.com>

Sent: Wednesday, October 2, 2024 5:01 AM

To: Littauer, Erin (FTA) <erin.littauer@dot.gov>

Cc: Rastelli, Scot (FTA) <Scot.Rastelli@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; Swaby, Howard (FTA) <howard.swaby@dot.gov>; Stojak, Mark (FTA) <mark.stojak@dot.gov>; Ziglar, Kristine (FTA) <Kristine.Ziglar@dot.gov>; Berkson, Rachel <Rachel.Berkson@mail.house.gov>; Jones, Heather (FTA) <heather.jones@dot.gov>; Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Girmay.Zahilay@kingcounty.gov; Teresa Mosqueda <teresa.mosqueda@kingcounty.gov>; Millar, Roger <roger.millar@wsdot.wa.gov>

Subject: Re: Data calls FTA to reconsider support for Sound Transit's West Seattle-Ballard light rail

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Greetings Ms. Littauer,

Thank you for your prompt response.

Our intention is to remind FTA, as awarding agency, of your agency's history and statements warning against the excessive costs and low efficacy of light rail vs. other, more effective modes for most urban transit applications. If FTA manages the environmental review process, including compliance with NEPA and other relevant environmental laws, then FTA clearly has influence over projects that receive FTA financial assistance.

One wonders what “the environmental review process” entails, when WSLE will erase more than three acres of forest, do irreparable harm to habitats and ecosystems, and take nearly 100 years to mitigate the 614,000 tons minimum of GhGs it will generate from construction (plus 5-8 years of traffic congestion during build-out).

Sound Transit’s FEIS affirms that the WSLE should be reconsidered, if not scrapped under the federally-mandated No Build option. In its ST3 transportation package, any project that is unaffordable, infeasible and/or unbuildable triggers the Section 2 reconsideration clause.

A project that is nearly \$5 billion over budget, will not (according to its FEIS) reduce traffic congestion or attract new riders, generates a carbon footprint that it will not mitigate until 2105, and features a two-mile, 160 foot high bridge that has never before been designed or built, is a project FTA should reconsider funding with taxpayer money.

My previous message was written before new WSLE figures — \$6-\$7 billion, were released. On

opening day for WSLE, Sound Transit will now have spent \$222,000-\$260,000 per rider to get each passenger on its train. Over time, per rider cost should still plateau at about \$600 per rider (if Sound Transit's ridership forecasts are accurate). FTA should be asking this sponsoring agency if it can use a \$600 per rider budget more effectively on other transit modes that are more efficient, lower carbon, less disruptive and less destructive.

As you may know, Sound Transit drop-in sessions are provided only to showcase WSLE proposals and plans. not provide forums for discussion. We have submitted, and continue to submit written and public comments to Sound Transit's board. We are still looking for strong, mitigating input from FTA, and a forum to discuss our concerns with your agency.

All the best,

Martin Westerman / 206-427-903
Regional Transit Partners and Rethink The Link

On Oct 1, 2024, at 3:57 PM, Littauer, Erin (FTA) <erin.littauer@dot.gov> wrote:

Mr. Westerman,

Thank you for your messages (emails recieved 9/23/2024 and voicemail on 9/26/2024) and interest in the West Seattle Link Extension (WSLE) project. The Federal Transit Administration (FTA) is a Federal Awarding Agency for the project and Sound Transit is the project sponsor. FTA manages the environmental review process, including compliance with the National Environmental Policy Act (NEPA) and other relevant environmental laws, for projects that receive financial assistance from FTA. The project sponsor is responsible for leading public involvement and for the selection of preferred alternatives.

In accordance with NEPA, Sound Transit is offering the following "Drop-in Sessions" for the WSLE project in October:

Drop-in session near Alaska Junction/Avalon

- **When:** Tuesday, Oct. 1, 4:30-6:30 p.m.
- **Where:** Alki Masonic Center, [4736 40th Ave SW](#), West Seattle
 - *Spanish and Vietnamese interpretation will be provided.*

Drop-in session in SODO

- **When:** Wednesday, Oct. 2, 11 a.m.-1 p.m.
- **Where:** Gallery B612, [1915 First Ave SW](#), SODO

The Sound Transit Board is anticipated to consider action to select the project to be built at its meetings on Oct. 10 and 24. Public comment will be accepted at those meetings. You can also submit written comments

towestseattlelink@soundtransit.org.

Thank you,

Erin Littauer
Environmental Protection Specialist
Federal Transit Administration- Region 10
U.S. Department of Transportation
Erin.littauer@dot.gov | www.transit.dot.gov

From: MartinWesterman <artartart@seanet.com>
Sent: Monday, September 23, 2024 3:46 PM
To: Fletcher, Susan (FTA) <susan.fletcher@dot.gov>
Cc: Rastelli, Scot (FTA) <Scot.Rastelli@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; Swaby, Howard (FTA) <howard.swaby@dot.gov>; Stojak, Mark (FTA) <mark.stojak@dot.gov>; Ziglar, Kristine (FTA) <Kristine.Ziglar@dot.gov>; Berkson, Rachel <Rachel.Berkson@mail.house.gov>
Subject: Data calls FTA to reconsider support for Sound Transit's West Seattle-Ballard light rail

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Greetings Madame Administrator, Directors and Specialists,

We are encouraging you to suspend FTA's support for Sound Transit's Ballard-Downtown-West Seattle light rail proposal (WSBLE), until all costs, impacts and ridership data are reconsidered. The FEIS has just been issued, and the issues raised in the 2022 DEIS have not been addressed. Any move forward from here without reconsideration will look more like political expediency than wisdom,

Can the proposed \$5 billion budget for the Downtown-West Seattle segment (WSLE) be spent better to improve transit?

The FTA and UMTA have long expressed concerns over light rail's impact on transit costs:

- In 1986, UMTA Deputy Director Rick Setner told American Demographics Magazine that light rail was not flexible, it was cost prohibitive, and "If you have six miles to do, it makes no sense to build six miles of tunnel, track and wire." Yet, he said, "many city officials look at light rail as a panacea. It's new, it's glitzy, and they think it makes them a world class city."
- On May 18, 2010, USDOT Undersecretary, Peter Rogoff said that financial difficulties facing mass transit networks are partially due to an

“unnecessary focus” on rail expansion over bus improvements. Using the flexibility of buses, “you can move a lot of people at very little cost compared to rail.” Rogoff is also former CEO of Sound Transit.

Seattle was fully served by rail 100 years ago, when 50 miles of interurban rail lines connected it to Everett in the north and Tacoma in the south, and its 70 miles of urban trolley and streetcar lines covered the city. That included 12 miles of track from downtown to West Seattle (WS), where it connected the northern and southern ends of the 10 square mile West Seattle (WS) peninsula. Then in the 1940s, Seattle tore it all out. Now Sound Transit is trying to recreate it.

In 2016, Sound Transit’s ST3 transportation package laid out simple criteria for voters to approve:

- improve public transit and boost ridership,
- protect the environment, and
- encourage economic development, equity, community-building and social justice.

In its 2022 DEIS, Sound Transit wanted to show that WSBLE offered more advantages than disadvantages. Instead, ST has shown the opposite is true.

Neither WSBLE nor the Downtown-West Seattle segment satisfies ST3 and DEIS criteria. WSLE should not be built:

- WSLE transit times and therefore ridership will degrade rather than improve.
- Construction will generate 614,000 tons of carbon, more than WSLE trains can ever mitigate
- Acres of forest and habitat will be eliminated, much of it with irreparable damage
- Economic development will be set back for at least a decade
- Equity, community-building and social justice will be set back at least a decade.

As you may already know,

- Though light rail investments may increase transit and ridership within high-demand corridors, they do not reduce congestion in “sprawl” cities: (<https://transfersmagazine.org/magazine-article/issue-2/does-light-rail-reduce-traffic/>).
- Most median income gains near new rail line developments go to high-income neighborhoods, not low-income transit users: (<https://uh-ir.tdl.org/items/5f739132-7b70-4585-9884-fafa2b2634bd>):
- Per capita transit ridership is declining as mobility and commuting behavior shift away from traditional transportation modes: (<https://scitechdaily.com/environmental-trade-offs-of-autonomous-vehicles-convenience-will-likely-come-at-a-cost/> 18 May 2021, and *Environmental Research Letters*, and **DOI: 10.1088/1748-9326/abf6f4**).
 - U.S. transit ridership has declined since 2013, despite continued growth in population: (https://www.researchgate.net/publication/325906474_The_Effect_of_Demographic_Changes_on_Transit_Ridership_Trends)

- [Sound Transit revenues do not cover its operating expenses](#). When construction costs are added, investments will never be recouped.

Metro Transit in 2014 told the West Seattle Transportation Coalition citizen's group that it would cancel a bus route costing more than \$7 per rider (\$10 in 2024 dollars). Metro told WSTC in 2017 that the four-mile WSLE segment would free its buses from having to travel that corridor, and enable it to redeploy those buses for better local service in West Seattle, downtown and beyond.

- Metro is basically advocating to transfer its \$10 per rider passengers in West Seattle onto WSLE, which will cost \$185,000 per rider on its opening day, then transfer that passenger back to a \$10 per rider Metro bus for further conveyance.
- Note: ST has reduced its WSLE ridership forecasts by 50% since 2015, from 58,000 /day then to 27,000 /day now, and ST has not hit its ridership projections since 2010. WSLE cost may drop to \$600 per rider after the first year if ST ridership projections are accurate.
- Cost per hour of user benefit is key to determining cost effectiveness.
 - After tallying operating, maintenance, and capital costs, and dividing by hours of benefit (travel time savings to existing and new riders, and net new riders), we get a result that may indicate that it may be beneficial to move people from bus to rail. That result will be misleading if the agency is only measuring a trip without including the full distance.

Beyond that, the Biden-Harris Administration is working to reduce U.S. carbon footprint. We expect USDOT (and UMTA and FTA) to be deeply engaged in this, both because the U.S. transportation sector generates about 31% of total U.S. energy-related carbon emissions, and because light rail construction generates more GhG than its running trains will ever mitigate:

- WSBL construction will output about three million tons of carbon, plus more generated by traffic congested during 5-8 years of build-out
- WSLE construction will generate 614,000 tons of carbon, plus traffic congestion GhGs
- Data and experience show that Sound Transit's mitigation plan — shifting drivers from personal vehicles to trains, will not occur in quantities that will mitigate the carbon it has generated
- ST has exacerbated its mitigation failure by already having cut about 140 acres of forest for its north-south trunk line; trees that would have absorbed approximately four million tons of carbon per year. ST has not tallied deforestation and erased sequestration material.
 - Deforestation also makes Seattle's heat islands worse, particularly in lower income areas
- Further, under Washington State's Climate Commitment Act (CCA), Sound Transit's level of carbon emissions – 500,000-600,000 tons per year – qualify it as a “large quantity carbon emissions generator.” Yet ST is not being required to pay for investments in carbon sequestration, as other entities are under the law.

The Puget Sound Regional Council predicts that by 2050, light rail will carry less than 3% of regional trips, buses less than 5%. and combined, the two modes will carry no more than 15% of Seattle trips. Unless FTA's ridership data and projections are more current than PSRC's, it would appear that FTA is supporting a \$4 billion investment in four miles of light rail that will not improve transit ridership.

In the 1980s, when the Shirley Highway HOV lanes in Northern Virginia were the busiest transit lanes in the U.S. outside of NYC, and carried more passengers than Chicago's Dan Ryan Expressway, UMTA approved Seattle's plan for a Third Ave. bus tunnel. Supporters expected it to help speed Metro Transit buses through downtown, improve bus service and rider experience, and reduce traffic congestion through downtown. Except for reducing traffic on a one-mile stretch of Third Avenue above the tunnel, none of the original expectations came true — even though it has now been converted to a bus-light rail tunnel. As part of WSLE, Sound Transit proposes to build a second tunnel, exclusively for light rail.

In 1988, Mr. Sentner said in some cities, light rail is appropriate, but in many more, it is cost prohibitive, has very limited application, or is not appropriate at all. "Instead of looking to be world class, cities should look to move people around," he said.

Currently between West Seattle and Downtown, riders can take a one seat, no transfer ride via bus. With light rail, they'll take a three seat, two-transfer ride over the same distance. A transit system can only be successful if it picks up people where they are, takes them where they want to go for a price they want, at time they want. With its transfer penalties and longer transit times, WSLE is not an option for success.

We would be happy to meet with you to discuss better transit options for Seattle's west side transit corridor.

All the best,
Martin Westerman and Regional Transit Partners

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Our intention is to remind FTA, as awarding agency, of your agency's history and statements warning against the excessive costs and low efficacy of light rail vs. other, more effective modes for most urban transit applications. If FTA manages the environmental review process, including compliance with NEPA and other relevant environmental laws, then FTA clearly has influence over projects that receive FTA financial assistance. One wonders what "the environmental review process" entails, when WSLE will erase more than three acres of forest, do irreparable harm to habitats and ecosystems, and take nearly 100 years to mitigate the 614,000 tons minimum of GhGs it will generate from construction (plus 5-8 years of traffic congestion during build-out).</p> <p>Sound Transit's FEIS affirms that the WSLE should be reconsidered, if not scrapped under the federally-mandated No Build option. In its ST3 transportation package, any project that is unaffordable, infeasible and/or unbuildable triggers the Section 2 reconsideration clause.</p> <p>A project that is nearly \$5 billion over budget, will not (according to its FEIS) reduce traffic congestion or attract new riders, generates a carbon footprint that it will not mitigate until 2105, and features a two-mile, 160 foot high bridge that has never before been designed or built, is a project FTA should reconsider funding with taxpayer money.</p> <p>My previous message was written before new WSLE figures — \$6-\$7 billion, were released. On opening day for WSLE, Sound Transit will now have spent \$222,000-\$260,000 per rider to get each passenger on its train. Over time, per rider cost should still plateau at about \$600 per rider (if Sound Transit's ridership forecasts are accurate). FTA should be asking this sponsoring agency if it can use a \$600 per rider budget more effectively on other transit modes that are more efficient, lower carbon, less disruptive and less destructive.</p> <p>As you may know, Sound Transit drop-in sessions are provided only to showcase WSLE proposals and plans. not provide forums for discussion. We have submitted, and continue to submit written and public comments to Sound Transit's board. We are still looking for strong, mitigating input from FTA, and a forum to discuss our concerns with your agency.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>

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Subject	Light rail extension into West SEattle
From	L. Scot Bastian
To	Email The Board
Sent	Thursday, October 3, 2024 4:37 PM

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RE: Light Rail extension into West Seattle

I am writing today to express my concerns about the light rail extension into West Seattle.

1. The cost of the extension has increased immensely, much higher than what was approved by the voters.
2. The number of commuters that this will support really is not very impressive--especially when you calculate the cost per rider.
3. Most of the light rail riders, in my opinion, will be cannibalized from the existing bus system.
4. Numerous West Seattle businesses will be disrupted or destroyed.
5. The absence of dedicated parking, which will require many riders to transfer from a bus and then transfer again at the Sodo station. (Most people will opt to drive, given a choice.)

I previously was a supporter of the light rail. In fact, I voted for it. But, for the reasons listed above, and other reasons, I have come to the conclusion that building the light rail extension is ill-advised. I strongly recommend that the no build option be considered. I suggest that the resources allocated to the light rail be deployed to support the existing public transportation system.

Thank you for your attention.

L. Scot Bastian Ph.D. (25 year resident of West Seattle and 33 year resident of Seattle)

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I am writing today to express my concerns about the light rail extension into West Seattle.</p> <p>The cost of the extension has increased immensely, much higher than what was approved by the voters.</p> <p>The number of commuters that this will support really is not very impressive--especially when you calculate the cost per rider.</p> <p>Most of the light rail riders, in my opinion, will be cannibalized from the existing bus system.</p> <p>Numerous West Seattle businesses will be disrupted or destroyed.</p> <p>The absence of dedicated parking, which will require many riders to transfer from a bus and then transfer again at the Sodo station. (Most people will opt to drive, given a choice.)</p> <p>I previously was a supporter of the light rail. In fact, I voted for it. But, for the reasons listed above, and other reasons, I have come to the conclusion that building the light rail extension is ill-advised. I strongly recommend that the no build option be considered. I suggest that the resources allocated to the light rail be deployed to support the existing public transportation system.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Subject	West Seattle Light Rail Spir
From	Larry Macmillan
To	Email The Board
Sent	Friday, October 4, 2024 8:06 AM

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RE: Light Rail extension into West Seattle

I am writing to express my objection to the light rail extension into West Seattle.

1. The cost of the extension has increased immensely, much higher than what was approved by the voters.
2. The number of commuters that this will support is not impressive--especially when you calculate the cost per rider.
3. I believe that most of the light rail riders, will be cannibalized from the existing bus system which I use.
4. Numerous West Seattle businesses will be disrupted or destroyed destroying communities like the one at West Seattle Health Club.
5. The absence of dedicated parking, which will require many riders to transfer from a bus and then transfer again at the Sodo station. I believe most people will opt to drive.

I previously was a supporter of the light rail. In fact, I voted for it. But, for the reasons listed above I have come to the conclusion that building the light rail extension is a bad idea. I strongly recommend that the no build option be considered. I suggest that the resources allocated to the light rail be deployed to support the existing public transportation system.

Thank you for your attention.

Larry Macmillan

6725 37th. Ave. S. W.

Seattle, WA 98126

lhmacmillan2005@gmail.com

206 769 8056

Sent from my iPhone

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I am writing to express my objection to the light rail extension into West Seattle.</p> <p>The cost of the extension has increased immensely, much higher than what was approved by the voters.</p> <p>The number of commuters that this will support is not impressive--especially when you calculate the cost per rider.</p> <p>I believe that most of the light rail riders, will be cannibalized from the existing bus system which I use.</p> <p>Numerous West Seattle businesses will be disrupted or destroyed destroying communities like the one at West Seattle Health Club.</p> <p>The absence of dedicated parking, which will require many riders to transfer from a bus and then transfer again at the Sodo station. I believe most people will opt to drive.</p> <p>I previously was a supporter of the light rail. In fact, I voted for it. But, for the reasons listed above I have come to the conclusion that building the light rail extension is a bad idea. I strongly recommend that the no build option be considered. I suggest that the resources allocated to the light rail be deployed to support the existing public transportation system.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Subject	West Seattle Light Rail Vote
From	Barbara Greenlee
To	Email The Board
Sent	Saturday, October 5, 2024 4:37 PM

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To the Board,

I was born here, have lived in West Seattle since 1946, and at this 45th and Edmunds address since 1971. Of course we have a had lot at stake as our neighborhood has been continually degraded and our taxes have finally become unaffordable while the "Urban Village" and threat of the proposed Light Rail has devastated our quality of life here. We are beyond the breaking point. Seven billion dollars now and the ever increasing price tag is finally the breaking for everyone else! Stop this four mile catastrophe now! Recall we've already paid for the Monorail. You are not geniuses.

Use the WS bus routes we've been missing for so long and let West Seattle be what West Seattle is, a unique cluster neighborhoods in the city. We do not have to be the Light Rail laughing stock boondoggle for the rest of the nation. We probably are already. Just stop it now! It's unaffordable and unnecessary!

Barbara and Merrill Greenlee

4808 45th Ave SW

Seattle, WA 98116

[Yahoo Mail: Search, Organize, Conquer](#)

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Of course we have a had lot at stake as our neighborhood has been continually degraded and our taxes have finally become unaffordable while the "Urban Village" and threat of the proposed Light Rail has devastated our quality of life here. We are beyond the breaking point. Seven billion dollars now and the ever increasing price tag is finally the breaking for everyone else! Stop this four mile catastrophe now! Recall we've already paid for the Monorail. You are not geniuses.</p> <p>Use the WS bus routes we've been missing for so long and let West Seattle be what West Seattle is, a unique cluster neighborhoods in the city. We do not have to be the Light Rail laughing stock boondoggle for the rest of the nation. We probably are already. Just stop it now! It's unaffordable and unnecessary!</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Subject	Light rail to West Seattle
From	Gale Sketchley
To	Email The Board
Sent	Saturday, October 5, 2024 10:09 AM

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Sent from my iPad: I believe the latest information on the no build option should be required reading for those making the decisions regarding the building of light rail to West Seattle. The articles and 16 page assessment of this huge project also requires the board members to change their stubbornness in supporting the other 3 options as a foregone conclusion. We need unbiased leadership in going forward not old thinking. No build option makes it clear that it has not addressed the significant issues for building light rail. I hope we can be assured that these elected leaders will work for the people of West Seattle.

Appendix C. Comments Received on the Final EIS and Responses

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1	I. believe the latest information on the no build option should be required reading for those making the decisions regarding the building of light rail to West Seattle. The articles and 16 page assessment of this huge project also requires the board members to change their stubbornness in supporting the other 3 options as a foregone conclusion. We need unbiased leadership in going forward not old thinking. No build option makes it clear that it has not addressed the significant issues for building light rail. I hope we can be assured that these elected leaders will work for the people of West Seattle.	Your opposition to the West Seattle Link Extension has been noted.

Subject	No build option
From	Gale Sketchley
To	Meeting Comments
Sent	Saturday, October 5, 2024 11:19 AM

Sent from my iPad. Required reading for the no build option : decisions should be made without previous biases for building the link. The latest information regarding this is found in environmental impact statement (EIS-C) pdf Rethink the link^J 394KB this is a comprehensive analysis of the failings of the sound transit to address the real issues. Leaders must reconsider their prior conclusions and really look at the reality of this project for the good of the people. Prior conclusions by those making these decisions must be addressed with a positive thorough thought process to other options than building the link. The board was elected to serve the people! Please do it! Thank you

Appendix C. Comments Received on the Final EIS and Responses

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Subject	Re: West Seattle Link Comment - WSJ-6 is the best design for West Seattle
From	Gary Reifel
To	Meeting Comments
Sent	Saturday, October 5, 2024 10:30 AM

Hi ST3 Board,

I attended the person meeting and was pleased to see/hear the WSEA line is progressing to final design.

There's a clear winner: WSJ-6 "No Avalon Station Tunnel Alternative" listed on page 26 of the Sept-24 Executive Summary.

Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative." My editorial comment underlined.

- WSJ-6 "No Avalon Station Tunnel" **costs less** \$1.4-1.50 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion. *This design is less likely to experience cost overruns due to litigation and construction delays.*
- Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge. *Tunnel under Avalon Blvd on the East side of Yancy reduces SFH & Roadway impacts.*
- Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative. *The BofA Space should be turned into a transit hub for bus train transfers, the property is under utilized currently.*
- Two station design complicates the bus/train transition. Better to create a centralized bus/train transfer at the Junction station.
- Improved Trip times to SoDO and downtown. *Quickened trip times will drive ridership, the Avalon Station .25/miles from the Junction station.*
- 10 Residential displacements and the cost of property acquisition on 32nd Ave are eliminated.
- ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy.

In closing, WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for WSEA. If the Avalon station build proceeds WSE will suffer years of roadway impacts and taxpayers will pay more for a system that could have been built more economically and quickly.

Thank you,

Gary Reifel - a 20+ year resident of West Seattle
206-601-1051

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>There's a clear winner: WSJ-6 "No Avalon Station Tunnel Alternative" listed on page 26 of the Sept-24 Executive Summary.</p> <ul style="list-style-type: none"> ○ Here's why this design is a considerable improvement over WSJ-5b the "preferred medium tunnel alternative." My editorial comment underlined. ○ WSJ-6 "No Avalon Station Tunnel" costs less \$1.4-1.50 billion vs. the 'preferred alternative' \$1.75 - 1.9 billion. This design is less likely to experience cost overruns due to litigation and construction delays. ○ Zero intersection or roadway impacts vs. 4+ years of construction roadway intersection of 35th, Fauntleroy and the WSEA Bridge. Tunnel under Avalon Blvd on the East side of Yancy reduces SFH & Roadway impacts. ○ Daily Ridership projection is about equal 7,500 vs 7,600 with the preferred alternative. The BofA Space should be turned into a transit hub for bus train transfers, the property is under utilized currently. ○ Two station design complicates the bus/train transition. Better to create a centralized bus/train transfer at the Junction station. ○ Improved Trip times to SoDO and downtown. Quickened trip times will drive ridership, the Avalon Station .25/miles from the Junction station. ○ 10 Residential displacements and the cost of property acquisition on 32nd Ave are eliminated. ○ ST3's assessment shows 38 fewer business displacements which includes Transitional Housing facilities at the intersection of Avalon Blvd. and Yancy. <p>In closing, WSJ-6 which eliminates the Avalon station and tunnels to a single Junction station is the best design for WSEA. If the Avalon station build proceeds WSE will suffer years of roadway impacts and taxpayers will pay more for a system that could have been built more economically and quickly.</p>	<p>Your support for Alternative WSJ-6 has been noted.</p>

Subject	Proposed West Seattle Light Rail Extension
From	Candace Shattuck
To	Email The Board
Sent	Sunday, October 6, 2024 1:46 PM

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I am writing to express my support for the NO BUILD option for the West Seattle Link Extension. Instead of repeating the reasons many others have, i.e. that busses already accomplish what we need, that the cost is staggering, that the bridge design is unproven, destruction of trees and habitat at Pigeon Point, etc, as outlined in Martin Westerman's excellent Sept 24 *Independent Assessment of Environmental Impact of the WSLE*. I hope you have read it.

Instead I want to lean in to another, underlying aspect: the way this proposal is being handled is a textbook example of why many people distrust government. I am rarely among that group, but in this case the stonewalling of thoughtful opposition, the bulldozing ahead despite serious questions, says something more is going on. How any responsible official can support this egregious project is a mystery to me. This is a quagmire you can still avoid and save face by taking the high road and electing the "No Build" option. Then set to work addressing real needs in other ways such as expanding bus service, maintaining roads and bridges and the like. That could really make a tangible difference, as well as gain public support and trust.

PLEASE RETHINK THE LINK.

With thanks,

Candace Shattuck
2745 California Ave SW, Apt 435
Seattle, WA 98116
410-725-1240

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I am writing to express my support for the NO BUILD option for the West Seattle Link Extension. Instead of repeating the reasons many others have, i.e. that busses already accomplish what we need, that the cost is staggering, that the bridge design is unproven, destruction of trees and habitat at Pigeon Point, etc, as outlined in Martin Westerman's excellent Sept 24 Independent Assessment of Environmental Impact of the WSLE. I hope you have read it.</p> <p>Instead I want to lean in to another, underlying aspect: the way this proposal is being handled is a textbook example of why many people distrust government. I am rarely among that group, but in this case the stonewalling of thoughtful opposition, the bulldozing ahead despite serious questions, says something more is afoot. How any responsible official can support this egregious project is a mystery to me. This is a quagmire you can still avoid and save face by taking the high road and electing the "No Build" option. Then set to work addressing real needs in other ways such as expanding bus service, maintaining roads and bridges and the like. That could really make a tangible difference, as well as gain public support and trust.</p> <p>PLEASE RETHINK THE LINK.</p>	<p>Your support for the No Build Alternative has been noted.</p>

Subject	WSLE TO Mission Cantina conflict of interest for Dow Constantine - his individual income benefits to override wasteful misuse of tax dollars
From	amine-tagline-0d@icloud.com
To	Email The Board
Sent	Sunday, October 6, 2024 11:58 PM

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The WSLE makes no sense other than for a very few:

- a few residences and businesses that stand to benefit from the new stops. Is Dow Constantine clouded in his judgment since he is owner of Mission Cantina?
- Sound Transit engineers that want to prove they can build across the Duwamish after still unable to deliver east link
- political members who don't want to lose scope growth and take another hit after the ID section was shut down.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The WSLE makes no sense other than for a very few:</p> <ul style="list-style-type: none">▪ a few residences and businesses that stand to benefit from the new stops. Is Dow Constantine clouded in his judgment since he is owner of Mission Cantina?▪ Sound Transit engineers that want to prove they can build across the Duwamish after still unable to deliver east link▪ political members who don't want to lose scope growth and take another hit after the ID section was shut down.	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Subject	The West Seattle Link Extension plan
From	Terry Scidmore
To	Email The Board; rob.saka@seattle.gov; teresa.mosqueda@seattle.gov
Sent	Monday, October 7, 2024 11:28 PM

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I'm asking if you would be so kind as to take a moment to read and reread the reasons The West Seattle Link Extension plan is not a viable plan, and reconsider before making your final decision.

Common sense says this plan just doesn't make sense.

There have been many detailed, well presented reasons why The West Seattle Link Extension should not be built - it is just too expensive, too damaging to the neighborhood's unique identities, the environment all along the path of the extension will be irreparably damaged, the various business communities will be impacted adversely, and the loss of viable housing that will likely not be rebuilt.

The West Seattle Link Extension plan is likely unbuildable due to escalating costs and untried design

I would like to add a few points to ponder from my own personal experience:

1) We've been here multiple times before - monorail ideas, tunnel ideas, light rail ideas, etc. When I lived in Highland Park (1983 -2017), I attended many of the meetings about whatever the newest transportation project promotion was. At every meeting I attended, the majority of the people from my neighborhood, who were currently taking buses to work in downtown or other areas, said they would continue to take their bus because the "new transportation idea" would require them to take additional buses to get to the "new transportation stations", adding both time and expense to their commute. The West Seattle Link Extension proposal has the same issue. It is being presented as a great and grand concept, but if the people taking the bus to work or shopping say right now they aren't going to take the "new transportation idea", I would believe them.

2) Cost has always been an issue. Data in every study with every "new transportation idea" suggests that expanded bus service would provide more flexibility, more quickly, and at a lower cost for neighborhoods like West Seattle for the people who are most likely going to be using the routes. Every "new transportation idea" seems to come with escalating costs and prolonged production issues. It is much less expensive, quicker, more flexible, and more viable to add good bus service.

Drawing from Dick Nelson's 2002 Selling a Transit Technology paper: "[Part 6: Alternatives](#) Using data from the City of Seattle's Intermediate Capacity Transit study, we calculate that the net social cost of the proposed Monorail is between three and four times greater than the same cost calculated for [Bus Rapid Transit \(BRT\)](#) in the same corridor. BRT would be a Metro bus improvement created by deploying low-floor articulated buses, curbside HOV lane operation, peak headways of five minutes, quarter mile minimum station spacing, and having higher speeds than buses now by installing signal preemption and other technologies. Capital costs for Monorail are higher than for BRT by a factor of six, and annual operating and maintenance costs are higher by a factor of nearly two. Monorail is more than twice as expensive as BRT for each passenger boarded."

This conclusion that buses are less expensive and more versatile is repeated in every "new transportation idea" study when it is honestly evaluated, including The West Seattle Link Extension plan.

3) The suggestion that \$50,000 will allow displaced businesses to relocate successfully is not realistic.

There is an older study about relocating minority businesses for urban renewal - what happened to the relocated businesses, who survived the relocation, who didn't, what resources would have helped the relocation. (<https://www.kcdc.org/wp-content/uploads/2022/10/A-Case-Study-of-the-Consequences-of-Displacement-Caused-by-Urban.pdf>) An interesting point of this study is "The non-survival rate was highest among the small eating and drinking, food stores, and miscellaneous retail and services. Fifty percent of the 14 eating and drinking establishments were unable to relocate, while 66 percent of the 9 food stores failed to relocate also. In addition, all 7 hotel and lodging establishments were unable to relocate, but all 5 of the apparel and accessory stores and the amusement and recreational services were able to relocate." There are many other studies about relocating businesses over the years that echo this same theme.

In another important point in the study, the author talks about the particular issues of minority businesses in a minority neighborhood. This particular neighborhood in the study was a black neighborhood, with black businesses run by black people, and patronized by black people. One issue in relocating was black businesses had to find black neighborhoods, with black patrons, with "room" for more black businesses like theirs. They didn't want to move to a new neighborhood and be in the position of competing with the same type of business for the same customer base. They wouldn't generally relocate their black business to a latino neighborhood, or a chinese neighborhood. Minority businesses have a more limited opportunity in relocating because they have to find a neighborhood that "fits" their business.

Which brings me to the International District. The largely asian population has asian businesses, providing services to asian customers, but also hiring mostly asian employees, who usually live in the neighborhood. Where will these businesses that will be displaced relocate to? Where will the employees who might also be displaced relocate to?

The September 10, 1996 Seattle Times article stated that Filsons stood firm about not relocating when the stadium site was chosen and would result in the relocation of 14 businesses, including 95 year old Filsons. Filsons shared the company had a very small area that it could relocate to, since its workforce in its clothing production was mostly made up of Asians who lived in the ID, and walked, rode a bike, or took at most one short bus ride to work. Moving outside of a very small area meant Filsons would lose not only valuable employees, but the employees would be forced to find other employment if they could not get to work in the manner, and at the cost, they had been able to do prior to the relocation. In a later article, Filsons also said the money provided to help out with relocation expenses was far short of what the relocation actually cost. Here is an actual October 7, 2024 cost estimate to open an expanded business venture which is similar to what many small businesses face when forced to relocate. I have a commercial building. One of my tenants just approached me about renting the second unit right next door in the same building when the current tenants lease ends in 2025, as well as continuing to rent his current location. His plan is to expand his business and he has been putting together his budget and getting quotes for what needs to be done. To remodel the unit next door, including demolition of walls, construction, electrical, plumbing, flooring, fixtures, lighting, painting, change of use permits, additional permits, additional employees, payroll costs, taxes, insurance needed during construction, and then new insurance when opening as his expanded business, first and last rents for both units, deposits, utilities, stocking the shelves, etc. would cost about \$150,000 - and possibly more. This is moving zero feet, not moving within a 50 mile radius relocation circle. How is \$50,000 going to help any of the displaced businesses relocate with any chance of success?

And this is a minority owned business in a minority neighborhood. If he had to relocate, he would have rather narrow options. He has built a client base in this neighborhood. His employees live in this neighborhood. He lives in this neighborhood - a block away from his business. He shops at the other neighborhood businesses, and they shop at his. His business, and the others surrounding him, are not high tech, investment, upper shelf, web based, cutting edge of the future type businesses. His business, and his neighbors' businesses, are doing what they know how to do - do business as it has been done in the country he came from.

In 1983, when I started my own business, my opening costs were \$28,000. \$50,000 would have been adequate in 1983, but not in 2024!

In my industry (retail picture framing), relocating your business even one block away usually results in a loss of 50% of your business. In my industry, customers may come into your store an average of once every 3 to 5 years or less, so if you move, they probably won't find you when they return. Businesses who have successfully moved were ones who planned for a 3 - 5 year relocation project - year one was the first year before the move, where every customer receives notification the business will be moving at xxx date to xxx address. Year two is relocation year, with continued advertisement and communication with every customer on file. Year three is at the new location, with again, continued communication with the customer base every quarter, and special offers and incentives to visit. The owners figured if they could get the customer in the door at the new location, they had about an 80% chance the customer would remember the shop had moved. This outreach continued for 2 more years after the move.

How many of the businesses that will be forced to relocate have the deep pockets and ability to plan for a three to five year transition of their business to a new community?

Common sense is needed here. I am asking you to use common sense.

Thank you for taking the time to read this. I am hoping you will consider and vote for the "no build" option for The West Seattle Link Extension plan.

Kind Regards,

Terry Scidmore-Finn

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The West Seattle Link Extension plan is not a viable plan, and reconsider before making your final decision.</p> <p>Common sense says this plan just doesn't make sense.</p> <p>There have been many detailed, well presented reasons why The West Seattle Link Extension should not be built - it is just too expensive, too damaging to the neighborhood's unique identities, the environment all along the path of the extension will be irreparably damaged, the various business communities will be impacted adversely, and the loss of viable housing that will likely not be rebuilt.</p> <p>The West Seattle Link Extension plan is likely unbuildable due to escalating costs and untried design</p> <p>I would like to add a few points to ponder from my own personal experience:</p> <p>We've been here multiple times before - monorail ideas, tunnel ideas, light rail ideas, etc. When I lived in Highland Park (1983 - 2017), I attended many of the meetings about whatever the newest transportation project promotion was. At every meeting I attended, the majority of the people from my neighborhood, who were currently taking buses to work in downtown or other areas, said they would continue to take their bus because the "new transportation idea" would require them to take additional buses to get to the "new transportation stations", adding both time and expense to their commute. The West Seattle Link Extension proposal has the same issue. It is being presented as a great and grand concept, but if the people taking the bus to work or shopping say right now they aren't going to take the "new transportation idea", I would believe them.</p> <p>Cost has always been an issue. Data in every study with every "new transportation idea" suggests that expanded bus service would provide more flexibility, more quickly, and at a lower cost for neighborhoods like West Seattle for the people who are most likely going to be using the routes. Every "new transportation idea" seems to come with escalating costs and prolonged production issues. It is much less expensive, quicker, more flexible, and more viable to add good bus service.</p> <p>Drawing from Dick Nelson's 2002 Selling a Transit Technology paper: "Part 6: Alternatives Using data from the City of Seattle's Intermediate Capacity Transit study, we calculate that the net social cost of the proposed Monorail is between three and four times greater than the same cost calculated for Bus Rapid Transit (BRT) in the same corridor. BRT would be a Metro bus improvement created by deploying low-floor articulated buses, curbside HOV lane operation, peak headways of five minutes, quarter mile minimum station spacing, and having higher speeds than buses now by installing signal preemption and other technologies. Capital costs for Monorail are higher than for BRT by a factor of six, and annual operating and maintenance costs are higher by a factor of nearly two. Monorail is more than twice as expensive as BRT for each passenger boarded."</p> <p>This conclusion that buses are less expensive and more versatile is repeated in every "new transportation idea" study when it is honestly evaluated, including The West Seattle Link Extension plan.</p>	<p>Your support for the No Build Alternative has been noted.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>The suggestion that \$50,000 will allow displaced businesses to relocate successfully is not realistic.</p> <p>There is an older study about relocating minority businesses for urban renewal - what happened to the relocated businesses, who survived the relocation, who didn't, what resources would have helped the relocation. (https://www.kcdc.org/wp-content/uploads/2022/10/A-Case-Study-of-the-Consequences-of-Displacement-Caused-by-Urban.pdf) An interesting point of this study is "The non-survival rate was highest among the small eating and drinking, food stores , and miscellaneous retail and services . Fifty percent of the 14 eating and drinking establishments were unable to relocate , while 66 percent of the 9 food stores failed to relocate also . In addition, all 7 hotel and lodging establishments were unable to relocate, but all 5 of the apparel and accessory stores and the amusement and recreational services were able to relocate." There are many other studies about relocating businesses over the years that echo this same theme.</p> <p>In another important point in the study, the author talks about the particular issues of minority businesses in a minority neighborhood. This particular neighborhood in the study was a black neighborhood, with black businesses run by black people, and patronized by black people. One issue in relocating was black businesses had to find black neighborhoods, with black patrons, with "room" for more black businesses like theirs. They didn't want to move to a new neighborhood and be in the position of competing with the same type of business for the same customer base. They wouldn't generally relocate their black business to a latino neighborhood, or a chinese neighborhood. Minority businesses have a more limited opportunity in relocating because they have to find a neighborhood that "fits" their business.</p> <p>Which brings me to the International District. The largely asian population has asian businesses, providing services to asian customers, but also hiring mostly asian employees, who usually live in the neighborhood. Where will these businesses that will be displaced relocate to? Where will the employees who might also be displaced relocate to?</p> <p>The September 10, 1996 Seattle Times article stated that Filsons stood firm about not relocating when the stadium site was chosen and would result in the relocation of 14 businesses, including 95 year old Filsons. Filsons shared the company had a very small area that it could relocate to, since its workforce in its clothing production was mostly made up of Asians who lived in the ID, and walked, rode a bike, or took at most one short bus ride to work. Moving outside of a very small area meant Filsons would lose not only valuable employees, but the employees would be forced to find other employment if they could not get to work in the manner, and at the cost, they had been able to do prior to the relocation. In a later article, Filsons also said the money provided to help out with relocation expenses was far short of what the relocation actually cost.</p> <p>Here is an actual October 7, 2024 cost estimate to open an expanded business venture which is similar to what many small businesses face when forced to relocate. I have a commercial building. One of my tenants just approached me about renting the second unit right next door in the same building when the current tenants lease ends in 2025, as well as continuing to rent his current location. His plan is to expand his business and he has been</p>	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>putting together his budget and getting quotes for what needs to be done. To remodel the unit next door, including demolition of walls, construction, electrical, plumbing, flooring, fixtures, lighting, painting, change of use permits, additional permits, additional employees, payroll costs, taxes, insurance needed during construction, and then new insurance when opening as his expanded business, first and last rents for both units, deposits, utilities, stocking the shelves, etc. would cost about \$150,000 - and possibly more. This is moving zero feet, not moving within a 50 mile radius relocation circle. How is \$50,000 going to help any of the displaced businesses relocate with any chance of success?</p> <p>And this is a minority owned business in a minority neighborhood. If he had to relocate, he would have rather narrow options. He has built a client base in this neighborhood. His employees live in this neighborhood. He lives in this neighborhood - a block away from his business. He shops at the other neighborhood businesses, and they shop at his. His business, and the others surrounding him, are not high tech, investment, upper shelf, web based, cutting edge of the future type businesses. His business, and his neighbors' businesses, are doing what they know how to do - do business as it has been done in the country he came from.</p> <p>In 1983, when I started my own business, my opening costs were \$28,000. \$50,000 would have been adequate in 1983, but not in 2024!</p> <p>In my industry (retail picture framing), relocating your business even one block away usually results in a loss of 50% of your business. In my industry, customers may come into your store an average of once every 3 to 5 years or less, so if you move, they probably won't find you when they return. Businesses who have successfully moved were ones who planned for a 3 - 5 year relocation project - year one was the first year before the move, where every customer receives notification the business will be moving at xxx date to xxx address. Year two is relocation year, with continued advertisement and communication with every customer on file. Year three is at the new location, with again, continued communication with the customer base every quarter, and special offers and incentives to visit. The owners figured if they could get the customer in the door at the new location, they had about an 80% chance the customer would remember the shop had moved. This outreach continued for 2 more years after the move.</p> <p>How many of the businesses that will be forced to relocate have the deep pockets and ability to plan for a three to five year transition of their business to a new community?</p> <p>Common sense is needed here. I am asking you to use common sense.</p> <p>Thank you for taking the time to read this. I am hoping you will consider and vote for the "no build" option for The West Seattle Link Extension plan.</p>	

Subject	West Seattle Rail WSJ-6 Alternative
From	Matthew Maciejewski
To	Meeting Comments; Swift, Lauren
Sent	Tuesday, October 8, 2024 8:37 PM

Hello,

I'm writing to vote for the WSJ-6 No Avalon Station Tunnel Alternative as opposed to the currently preferred WSJ-5b option. WSJ-6 is cheaper and causes far less disruption and displacements, while only lowering projected ridership by 100. A 1 station vs 2 station design has other benefits too - quicker trips to downtown from Junction, and lower maintenance costs.

Thanks,

Matt

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	I'm writing to vote for the WSJ-6 No Avalon Station Tunnel Alternative as opposed to the currently preferred WSJ-5b option. WSJ-6 is cheaper and causes far less disruption and displacements, while only lowering projected ridership by 100. A 1 station vs 2 station design has other benefits too - quicker trips to downtown from Junction, and lower maintenance costs.	Your support for Alternative WSJ-6 has been noted.

From: M Miller <marcylmiller@gmail.com>

Sent: Tuesday, October 8, 2024 5:14 PM

To: Meeting Comments <MeetingComments@soundtransit.org>; carlasrogers@gmail.com; kcexec@kingcounty.gov; Swift, Lauren <lauren.swift@soundtransit.org>; rob.saka@seattle.gov; Bruce.Harrell@seattle.gov

Subject: West Seattle Design

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To Whom It May Concern,

I've been involved in community feedback regarding the West Seattle Rail Design since 2020. My comments then are similar to those now. The best design for all of West Seattle is **WSJ-6 "No Avalon Station Tunnel Alternative."** We have been asking for this option for years along with a slight enhancement to move the tunnel opening to the east side of Avalon at Yancy.

This option costs less AND is a better rider experience, reducing the number of stops with little impact to ridership. We already know the project is far over budget. We also are aware of how close the Junction and Avalon stations are to one another, especially when considering station placements throughout the entire system and challenges with the Avalon location being so close to the bridge.

Tunneling under Avalon Blvd on the East Side of Yancy will reduce roadway impacts and is a allows for more equitable design that wealthier areas like Roosevelt received as they were able to advocate that the light rail move from an above ground to a tunneled approach. It reduces impact to businesses and residences.

In closing, the WSJ-6 design which eliminates the Avalon station and tunnels to a single Junction station is the best design for West Seattle

Thank you,

Marcy Miller

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The best design for all of West Seattle is WSJ-6 “No Avalon Station Tunnel Alternative.” We have been asking for this option for years along with a slight enhancement to move the tunnel opening to the east side of Avalon at Yancy.</p> <p>This option costs less AND is a better rider experience, reducing the number of stops with little impact to ridership. We already know the project is far over budget. We also are aware of how close the Junction and Avalon stations are to one another, especially when considering station placements throughout the entire system and challenges with the Avalon location being so close to the bridge.</p> <p>Tunneling under Avalon Blvd on the East Side of Yancy will reduce roadway impacts and is a allows for more equitable design that wealthier areas like Roosevelt received as they were able to advocate that the light rail move from an above ground to a tunneled approach. It reduces impact to businesses and residences.</p>	<p>Your support for Alternative WSJ-6 has been noted.</p>

Subject	Oppose the West Seattle Light Rail Project - Enhance Rapid Ride
From	hkemery@comcast.net
To	Email The Board
Sent	Wednesday, October 9, 2024 6:57 AM

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We respectfully oppose the current Sound Transit project proposal based on the following key concerns:

- **Excessive Costs:**

The projected cost of the proposed Sound Transit project is disproportionate to its benefits. Large-scale construction and long-term operational expenses present a significant financial burden on taxpayers, especially when there are more cost-effective alternatives available. Enhancing existing services, like RapidRide, can deliver comparable improvements at a fraction of the cost.

- **Project Impacts on Communities:**

The construction and development of new rail lines and associated infrastructure will cause significant disruptions to local communities, businesses, and residents. These impacts include potential displacement, noise pollution, road closures, and a reduction in accessibility to affected areas during the construction phase, causing harm to local economies and quality of life.

- **Environmental Concerns:**

The proposed project risks causing unnecessary environmental degradation. Large-scale construction projects often result in habitat destruction, air pollution, and increased carbon emissions. By contrast, improving existing transportation networks like RapidRide would have a far smaller environmental footprint while still achieving public transportation goals.

- **Better Reach with Enhanced RapidRide Service:**

The goals of increased connectivity and transportation efficiency can be more easily accomplished by enhancing the RapidRide network. Expanding RapidRide's reach, increasing frequency, and improving infrastructure would allow for broader coverage, benefiting a wider population without the need for expensive and environmentally damaging new infrastructure.

- **Faster Implementation and Flexibility:**

Improving the RapidRide system can be implemented more quickly and adjusted over time to meet changing demands. In contrast, large rail projects are notoriously slow, inflexible, and unable to respond to shifting transportation needs once completed.

In light of these facts, we urge Sound Transit to reconsider the current proposal and explore enhancements to existing services, such as RapidRide, that are more cost-effective, environmentally sustainable, and beneficial to the broader community.

Respectfully,
Holly Kemery

Holly M Kemery

206 484.4140 Text Enabled

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The projected cost of the proposed Sound Transit project is disproportionate to its benefits. Large-scale construction and long-term operational expenses present a significant financial burden on taxpayers, especially when there are more cost-effective alternatives available. Enhancing existing services, like RapidRide, can deliver comparable improvements at a fraction of the cost.</p> <p>Project Impacts on Communities:</p> <p>The construction and development of new rail lines and associated infrastructure will cause significant disruptions to local communities, businesses, and residents. These impacts include potential displacement, noise pollution, road closures, and a reduction in accessibility to affected areas during the construction phase, causing harm to local economies and quality of life.</p> <p>Environmental Concerns:</p> <p>The proposed project risks causing unnecessary environmental degradation. Large-scale construction projects often result in habitat destruction, air pollution, and increased carbon emissions. By contrast, improving existing transportation networks like RapidRide would have a far smaller environmental footprint while still achieving public transportation goals.</p> <p>Better Reach with Enhanced RapidRide Service:</p> <p>The goals of increased connectivity and transportation efficiency can be more easily accomplished by enhancing the RapidRide network. Expanding RapidRide's reach, increasing frequency, and improving infrastructure would allow for broader coverage, benefiting a wider population without the need for expensive and environmentally damaging new infrastructure.</p> <p>Faster Implementation and Flexibility:</p> <p>Improving the RapidRide system can be implemented more quickly and adjusted over time to meet changing demands. In contrast, large rail projects are notoriously slow, inflexible, and unable to respond to shifting transportation needs once completed.</p> <p>In light of these facts, we urge Sound Transit to reconsider the current proposal and explore enhancements to existing services, such as RapidRide, that are more cost-effective, environmentally sustainable, and beneficial to the broader community.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Subject	West Seattle Link Needs to be Better
From	Glenn Laubaugh
To	Email The Board
Sent	Wednesday, October 9, 2024 10:20 AM

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Dear SoundTransit Board;

I've been observing the developments of Link for some time. Obviously, the board has decided that West Seattle is the most important place to serve with the next light rail project.

So far, however, none of the projects appear to be able to deliver better transit for the area. Even after the finished project is completed, the vast majority of transit users in West Seattle will have to transfer from a bus to Link somewhere in West Seattle. If the deep tunnel is built, then that will require substantial time to get from the bus to the train, negating any advantage Link may have had over the existing buses.

The majority of this project needs to be paused until a version of the project that actually benefits transit users is developed.

The only part of this project that may be worth building, at this point, is to build the new West Seattle Bridge, only build it as a convertible light rail and bus bridge. Connect this bridge to the SoDo busway, and highway 99. This will provide more benefit to all transit users in West Seattle than any of the proposed Link options will. It provides though service from multiple points throughout West Seattle to downtown without having to transfer anywhere.

- Glenn L

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Obviously, the board has decided that West Seattle is the most important place to serve with the next light rail project.</p> <p>So far, however, none of the projects appear to be able to deliver better transit for the area. Even after the finished project is completed, the vast majority of transit users in West Seattle will have to transfer from a bus to Link somewhere in West Seattle. If the deep tunnel is built, then that will require substantial time to get from the bus to the train, negating any advantage Link may have had over the existing buses.</p> <p>The majority of this project needs to be paused until a version of the project that actually benefits transit users is developed.</p>	Your comment has been noted.
2	<p>The only part of this project that may be worth building, at this point, is to build the new West Seattle Bridge, only build it as a convertible light rail and bus bridge. Connect this bridge to the SoDo busway, and highway 99. This will provide more benefit to all transit users in West Seattle than any of the proposed Link options will. It provides through service from multiple points throughout West Seattle to downtown without having to transfer anywhere.</p>	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail</p>

Subject	Ballard/West Seattle Light Rail
From	Oliver Chen
To	Email The Board
Sent	Wednesday, October 9, 2024 11:58 AM

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Hi,

With the recent cost escalations on West Seattle light rail, I'd like to ask that you consider completing the Ballard light rail extension before West Seattle

My understanding is this, please correct me if I am mistaken:

- Without the Ballard extension, the West Seattle line will end in SODO
- Building the West Seattle line with its increased costs will result in a delay to the Ballard extension due to Sound Transit's debt capacity

Thank you for your time,

Oliver Chen

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>With the recent cost escalations on West Seattle light rail, I'd like to ask that you consider completing the Ballard light rail extension before West Seattle</p> <p>My understanding is this, please correct me if I am mistaken:</p> <p>Without the Ballard extension, the West Seattle line will end in SODO</p> <p>Building the West Seattle line with its increased costs will result in a delay to the Ballard extension due to Sound Transit's debt capacity</p>	<p>Refer to Chapter 2, Alternatives Considered, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for information regarding operations before and after the Ballard Link Extension opens.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>



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I am writing this to voice my opposition to bringing Sound Transit to West Seattle.

I oppose it for these reasons:

1. Cost. The price for 4 miles of track has ballooned since the voters approved Sound Transit. We are now looking at over \$1,000,000,000 per mile. The track would be 4 miles long. We currently have a pretty good bus system that gets us to SODO. For a pittance of what Sound Transit would cost, we could have an upgraded bus system.
2. Design. The high rise bridge to get the trains into & out of West Seattle has no track record. It's a new design & on a fault line. What could go wrong?
3. Disruption. Our beautiful community will be disrupted for years. Businesses will be lost. Homes will be destroyed. The West Seattle Bridge will be impacted. We all dealt with that for over 2 years.
4. Not needed. I am not opposed to Light Rail, but I am opposed to it in WestSeattle.

It is not needed & not worth all the chaos it will bring to our community.

I feel we need to rethink this & not just plow head. Please use common sense & stop this project totally.

Sincerely,
Marsha Lubetkin

Sent from my iPad

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I am writing this to voice my opposition to bringing Sound Transit to West Seattle. I oppose it for these reasons:</p> <ol style="list-style-type: none"> 1. Cost. The price for 4 miles of track has ballooned since the voters approved Sound Transit. We are now looking at over \$1,000,000,000 per mile. The track would be 4 miles long. We currently have a pretty good bus system that gets us to SODO. For a pittance of what Sound Transit would cost, we could have an upgraded bus system. 2. Design. The high rise bridge to get the trains into & out of West Seattle has no track record. It's a new design & on a fault line. What could go wrong? 3. Disruption. Our beautiful community will be disrupted for years. Businesses will be lost. Homes will be destroyed. The West Seattle Bridge will be impacted. We all dealt with that for over 2 years. 4. Not needed. I am not opposed to Light Rail, but I am opposed to it in West Seattle. It is not needed & not worth all the chaos it will bring to our community. <p>I feel we need to rethink this & not just plow head. Please use common sense & stop this project totally.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>

Subject	West Seattle Link
From	Noelle Million
To	Email The Board
Sent	Wednesday, October 9, 2024 9:18 AM

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This is to encourage you to think about the huge waste of our dollars it is to build a light rail link to West Seattle. I've been a bus rider in Seattle since early 1950's and I still choose not to drive, I love our bus system. This plan of yours is deeply disturbing to me. Please think of those of us who are vehemently opposed to your plan.

Please view the U-Video here. I agree 100% with this speaker.
Hoping you hear me and my neighbors loudly and clearly.

[10 reasons to not build West Seattle Light Rail
youtu.be](#)

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>This is to encourage you to think about the huge waste of our dollars it is to build a light rail link to West Seattle. I've been a bus rider in Seattle since early 1950's and I still choose not to drive, I love our bus system. This plan of yours is deeply disturbing to me. Please think of those of us who are vehemently opposed to your plan.</p> <p>Please view the U-Video here. I agree 100% with this speaker.</p> <p>https://www.youtube.com/watch?v=OoKod7Np8Xk</p> <p>Hoping you hear me and my neighbors loudly and clearly.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

From: tanya hurst <tanyahurst@gmail.com>

Sent: Thursday, October 10, 2024 12:21 PM

To: Harrell, Bruce <Bruce.Harrell@Seattle.gov>; rob.saka@seattle.gov; Swift, Lauren <lauren.swift@soundtransit.org>; kcexec@kingcounty.gov; carla.rogers@gmail.com; Meeting Comments <MeetingComments@soundtransit.org>

Subject: WSJ-6 DEL-7

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Hi,

I'm emailing to avoid additional cost and impact to the Avalon area of West Seattle. I'm advocating for WSJ-6 No Avalon Station w/DEL-7 option. This has the least amount of impact to our community. This will cost less, should have less cost overruns, preserve the neighborhood between SW Avalon Way to the Bank of America parking lot, avoid pedestrian risk with a station so close to the bridge and zero intersection or roadway impacts vs 4+ years of construction! Please consider this or the NO BUILD option.

Tanya Hurst

Appendix C. Comments Received on the Final EIS and Responses

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1	I'm emailing to avoid additional cost and impact to the Avalon area of West Seattle. I'm advocating for WSJ-6 No Avalon Station w/DEL-7 option. This has the least amount of impact to our community. This will cost less, should have less cost overruns, preserve the neighborhood between SW Avalon Way to the Bank of America parking lot, avoid pedestrian risk with a station so close to the bridge and zero intersection or roadway impacts vs 4+ years of construction! Please consider this or the NO BUILD option.	Your support for Alternatives DEL-7, WSJ-6, and the No Build Alternative has been noted.

Subject	Resolution No. R2024-22: Selecting the route, profile, and stations to be built for the West Seattle Link Extension project.
From	Marilyn Kennell
To	Meeting Comments
Cc	Alan McMurray; jan roberts
Sent	Thursday, October 10, 2024 10:05 AM

Resolution No. R2024-22: Selecting the route, profile, and stations to be built for the West Seattle Link Extension project.

Sound Transit's Final EIS disclosed that the 4-mile West Seattle light rail cost estimate is now over \$7 billion. Under Section 2 of the ST3 package, the board **must** reconsider projects that are infeasible, unaffordable and/or unbuildable. At \$1.5 billion dollars per mile - this project is "**unaffordable**". Therefore, we ask the board to recommend a NO BUILD solution to the ST 3 WSLE light rail project.

The Final EIS acknowledges that light rail construction will do irreparable damage to West Seattle's (1) environment and (2) community. The NO BUILD option would preclude this devastation.

(1) Sound Transit's present plans will claim 2 to 3 acres of our **urban canopy**. Chopping down thousands of trees in Delridge will increase that community's existing "heat island". Delridge suffers more than our leafy neighborhoods when the weather gets hot. Choosing the NO BUILD option will keep our poorer neighborhoods from becoming even hotter during coming heat waves.

Sound Transit acknowledges that cleaving off Pigeon Point and disrupting the Longfellow Creek eco-system will do "**irreparable**" and "**permanent**" damage. Mitigation plans for heron, salmon, and beaver habitats are vague or non-existent in the DEIS. To save West Seattle's irreplaceable eco-systems, we urge you to adopt the NO BUILD option.

(2) 70 some West Seattle businesses will be forced to close. 500 to 1000 people will lose their jobs. West Seattle will lose **13** grocery stores, restaurants, delis, and coffee shops creating a "food desert " from Delridge to the Alaska Junction. The more affluent among us will be able to drive (causing more car trips to alternate food sources) - but those without cars will, again, suffer disproportionately.

West Seattle children will lose two music schools; so 1000 kids will no longer have lessons and camps within walking distance. ST is planning to put a pillar through the West Seattle Health Club swimming pool where 1300 children take lessons. 6200 members of all ages will be bereft of a main source of health enhancing physical and social activities.

WEST SEATTLE IS CLOSE TO BEING A 15-MINUTE CITY - ALMOST EVERYTHING WE NEED IS WITHIN A 15 MINUTE WALK, BIKE OR BUS RIDE, OR A SHORT TRIP BY CAR. DESTROYING NEIGHBORHOODS, BUSINESSES, HOMES, JOBS AND DISRUPTING TRAFFIC FOR 6-8 YEARS (FOR 4 MILES OF LIGHT RAIL THAT WILL TAKE US ONLY TO SODO) - DOES NOT MAKE SENSE. WE ASK THE BOARD TO CALL FOR THE NO BUILD OPTION.

WE ARE FOR MASS-TRANSIT **AND** WE ARE AGAINST GOING AHEAD WITH WEST SEATTLE LIGHT RAIL. **NO BUILD** DOES NOT MEAN BUILD NOTHING - IT MEANS DO NOT BUILD A PROJECT THAT HAS MORE NEGATIVE IMPACTS THAN BENEFITS.

FOR \$7 BILLION DOLLARS, WE COULD BUY 3000 BRAND NEW ELECTRIC BUSES FOR WEST SEATTLE (THEY COST \$1 MILLION DOLLARS EACH) AND YOU WOULD STILL HAVE \$4 BILLION DOLLARS LEFT OVER FOR THE REST OF THE REGION'S TRANSIT NEEDS. **THE NO BUILD OPTION IS A WIN-WIN!**

MARILYN KENNEL
WEST SEATTLE

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Sound Transit's Final EIS disclosed that the 4-mile West Seattle light rail cost estimate is now over \$7 billion. Under Section 2 of the ST3 package, the board must reconsider projects that are infeasible, unaffordable and/or unbuildable. At \$1.5 billion dollars per mile - this project is "unaffordable". Therefore, we ask the board to recommend a NO BUILD solution to the ST 3 WSLE light rail project.</p> <p>The Final EIS acknowledges that light rail construction will do irreparable damage to West Seattle's (1) environment and (2) community. The NO BUILD option would preclude this devastation.</p> <p>(1) Sound Transit's present plans will claim 2 to 3 acres of our urban canopy. Chopping down thousands of trees in Delridge will increase that community's existing "heat island". Delridge suffers more than our leafy neighborhoods when the weather gets hot. Choosing the NO BUILD option will keep our poorer neighborhoods from becoming even hotter during coming heat waves.</p> <p>Sound Transit acknowledges that cleaving off Pigeon Point and disrupting the Longfellow Creek eco-system will do "irreparable" and "permanent" damage. Mitigation plans for heron, salmon, and beaver habitats are vague or non-existent in the DEIS. To save West Seattle's irreplaceable eco-systems, we urge you to adopt the NO BUILD option.</p> <p>(2) 70 some West Seattle businesses will be forced to close. 500 to 1000 people will lose their jobs. West Seattle will lose 13 grocery stores, restaurants, delis, and coffee shops creating a "food desert " from Delridge to the Alaska Junction. The more affluent among us will be able to drive (causing more car trips to alternate food sources) - but those without cars will, again, suffer disproportionately.</p> <p>West Seattle children will lose two music schools; so 1000 kids will no longer have lessons and camps within walking distance. ST is planning to put a pillar through the West Seattle Health Club swimming pool where 1300 children take lessons. 6200 members of all ages will be bereft of a main source of health enhancing physical and social activities.</p> <p>WEST SEATTLE IS CLOSE TO BEING A 15-MINUTE CITY - ALMOST EVERYTHING WE NEED IS WITHIN A 15 MINUTE WALK, BIKE OR BUS RIDE, OR A SHORT TRIP BY CAR. DESTROYING NEIGHBORHOODS, BUSINESSES, HOMES, JOBS AND DISRUPTING TRAFFIC FOR 6-8 YEARS (FOR 4 MILES OF LIGHT RAIL THAT WILL TAKE US ONLY TO SODO) - DOES NOT MAKE SENSE. WE ASK THE BOARD TO CALL FOR THE NO BUILD OPTION.</p> <p>WE ARE FOR MASS-TRANSIT AND WE ARE AGAINST GOING AHEAD WITH WEST SEATTLE LIGHT RAIL. NO BUILD DOES NOT MEAN BUILD NOTHING - IT MEANS DO NOT BUILD A PROJECT THAT HAS MORE NEGATIVE IMPACTS THAN BENEFITS.</p> <p>FOR \$7 BILLION DOLLARS, WE COULD BUY 3000 BRAND NEW ELECTRIC BUSES FOR WEST SEATTLE (THEY COST \$1 MILLION DOLLARS EACH) AND YOU WOULD STILL HAVE \$4 BILLION DOLLARS LEFT OVER FOR THE REST OF THE REGION'S TRANSIT NEEDS. THE NO BUILD OPTION IS A WIN-WIN!</p>	<p>Your support for the No Build Alternative has been noted.</p>

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Subject	It's going to be painful, but we need to do what is right: RBT
From	Maren Costa
To	Meeting Comments
Sent	Thursday, October 10, 2024 10:37 AM

The West Seattle light rail link is making less and less sense as we get closer and closer:

- It was already a very expensive project, traversing very difficult and sensitive terrain and ecosystems.
- The projected usage numbers, capacity, and trip times are unsatisfactory. In fact, it actually makes most people's commute *longer* and *more complicated* than the existing bus solutions.
- It does nothing to solve transit deserts.
- By the time it is slated to come online, it will already be outdated. I'm currently visiting San Francisco and there are self-driving cars everywhere. Imagine what transportation will be like 10 or 15 years from now when this project is finally finished.
- And it will be many more years before it is connected to anything north or south on this side of the bridge.
- The carbon impact to build it negates any carbon savings for hundreds of years.
- It is of course very disruptive to many businesses and residences.
- And now, the cost has ballooned beyond what was already a ridiculous price tag.

YES, we *absolutely* need public transit—public transit that is irresistibly convenient, safe, scalable and informed by current thinking and future possibilities. The West Seattle link will not deliver enough benefits—in fact, it will deliver quite a bit of harm—for a very steep price tag. We should not proceed with an expensive, ineffective project just because voters unwittingly voted for something years ago that they will not be happy with now. I think if voters had adequate time to understand what they are getting for what they are paying, this would not pass.

Thank you for considering our communities comments.

Maren Costa

U.S. Advisor

[Work For Climate](#)

[Book time with me](#)

206.817.1031

Appendix C. Comments Received on the Final EIS and Responses

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1	<p>The West Seattle light rail link is making less and less sense as we get closer and closer:</p> <p>It was already a very expensive project, traversing very difficult and sensitive terrain and ecosystems.</p> <p>The projected usage numbers, capacity, and trip times are unsatisfactory. In fact, it actually makes most people's commute longer and more complicated than the existing bus solutions.</p> <p>It does nothing to solve transit deserts.</p> <p>By the time it is slated to come online, it will already be outdated. I'm currently visiting San Francisco and there are self-driving cars everywhere. Imagine what transportation will be like 10 or 15 years from now when this project is finally finished.</p> <p>And it will be many more years before it is connected to anything north or south on this side of the bridge.</p> <p>The carbon impact to build it negates any carbon savings for hundreds of years.</p> <p>It is of course very disruptive to many businesses and residences.</p> <p>And now, the cost has ballooned beyond what was already a ridiculous price tag.</p> <p>YES, we absolutely need public transit—public transit that is irresistibly convenient, safe, scalable and informed by current thinking and future possibilities. The West Seattle link will not deliver enough benefits—in fact, it will deliver quite a bit of harm—for a very steep price tag. We should not proceed with an expensive, ineffective project just because voters unwittingly voted for something years ago that they will not be happy with now. I think if voters had adequate time to understand what they are getting for what they are paying, this would not pass.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Subject	10/10 System Expansion Committee Public Comment
From	Johannes Heine
To	Meeting Comments
Sent	Thursday, October 10, 2024 11:31 AM

Dear Sound Transit System Expansion Committee Members,

I strongly urge you to change the preferred alternative to DEL-7, the "No Avalon Station" option for the West Seattle Link Extension.

This option reduces residential and business displacements, minimizing community disruption while saving money, reducing transit time to downtown and with little to no effect on ridership estimates. By eliminating Avalon Station, we can maintain a more streamlined and cost-effective project.

I urge you to select this option for the benefit of our community.

Sincerely,

Johannes Heine

West Seattle Resident

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I strongly urge you to change the preferred alternative to DEL-7, the "No Avalon Station" option for the West Seattle Link Extension.</p> <p>This option reduces residential and business displacements, minimizing community disruption while saving money, reducing transit time to downtown and with little to no effect on ridership estimates. By eliminating Avalon Station, we can maintain a more streamlined and cost-effective project.</p> <p>I urge you to select this option for the benefit of our community.</p>	<p>Your support for Alternatives DEL-7 and WSJ-6 has been noted.</p>

Subject	WSJ-6 DEL-7
From	tanya_hurst
To	Harrell, Bruce; rob.saka@seattle.gov ; Swift, Lauren; kcexec@kingcounty.gov ; carla.rogers@gmail.com ; Meeting Comments
Sent	Thursday, October 10, 2024 12:21 PM

Hi,

I'm emailing to avoid additional cost and impact to the Avalon area of West Seattle. I'm advocating for WSJ-6 No Avalon Station w/DEL-7 option. This has the least amount of impact to our community. This will cost less, should have less cost overruns, preserve the neighborhood between SW Avalon Way to the Bank of America parking lot, avoid pedestrian risk with a station so close to the bridge and zero intersection or roadway impacts vs 4+ years of construction! Please consider this or the NO BUILD option.

Tanya Hurst

Appendix C. Comments Received on the Final EIS and Responses

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1	I'm emailing to avoid additional cost and impact to the Avalon area of West Seattle. I'm advocating for WSJ-6 No Avalon Station w/DEL-7 option. This has the least amount of impact to our community. This will cost less, should have less cost overruns, preserve the neighborhood between SW Avalon Way to the Bank of America parking lot, avoid pedestrian risk with a station so close to the bridge and zero intersection or roadway impacts vs 4+ years of construction! Please consider this or the NO BUILD option.	Your support for Alternatives DEL-7, WSJ-6, and the No Build Alternative has been noted.

Subject	12/8 Executive Committee Meeting Public Comment:
From	Pamela Adams
To	Meeting Comments
Sent	Thursday, October 10, 2024 12:39 PM

Dear System Expansion Committee:

The ST3 transportation package that Sound Transit presented to voters in 2016 offered simple criteria for voters to consider:

- improve public transit,
- encourage economic development, equity community building and social justice,
- **protect the environment.**

From my reading the EIS there are concerns in gaps of knowledge and understanding of how the West Seattle Light Rail Extension Link will not protect the environment, but will impact Pigeon Point and the Great Blue Heron historic nesting area, and more critically Longfellow Creek at the first daylight section.

Since 2023 this is the only Seattle watershed documenting wild coho salmon spawning for the past three fall seasons. These are endangered wild coho salmon spawning, and more amazing there are juvenile fry, and parr living year-round in the section of creek between Andover and Yancey -where there is a beaver dam holding water for the fish even in our drought conditions. Natural processes are taking place in this 4 mile creek that is already 52% paved over. This critical habitat area is right where the building of the link pillars are a slated to go. **How will the construction of the pillars not impact this sensitive watershed and salmon habitat?**

Please consider the NO BUILD option, and look to improving the existing transportation infrastructure in West Seattle.

Thank you,
Pamela Adams
Alki Beach Resident

More Information about the salmon and beavers in Longfellow Creek can be found here:

[BeaverInsights](#)
[beaverinsights.com](#)

Appendix C. Comments Received on the Final EIS and Responses

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1	<p>From my reading the EIS there are concerns in gaps of knowledge and understanding of how the West Seattle Light Rail Extension Link will not protect the environment, but will impact Pigeon Point and the Great Blue Heron historic nesting area, and more critically Longfellow Creek at the first daylight section.</p> <p>Since 2023 this is the only Seattle watershed documenting wild coho salmon spawning for the past three fall seasons. These are endangered wild coho salmon spawning, and more amazing there are juvenile fry, and parr living year-round in the section of creek between Andover and Yancey -where there is a beaver dam holding water for the fish even in our drought conditions. Natural processes are taking place in this 4 mile creek that is already 52% paved over. This critical habitat area is right where the building of the link pillars are a slated to go. **How will the construction of the pillars not impact this sensitive watershed and salmon habitat? **</p> <p>Please consider the NO BUILD option, and look to improving the existing transportation infrastructure in West Seattle.</p>	<p>Your support for No Build Alternative has been noted.</p>

Subject	WEST SEATTLE EXTENSION....
From	M Rogers
To	Email The Board
Sent	Thursday, October 10, 2024 12:57 PM

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To ALL Sound Transit Board Members,

I have been following plans for the Sound Transit West Seattle extension with great anxiety since I became aware of the impact it will have on the WEST SEATTLE HEALTH CLUB. I have been a member for many years as have so many others and the loss would be a huge blow to our community.

As a tax-paying resident of West Seattle, I cannot understand how Sound Transit can justify the billions of dollars to create a system that will benefit so few people and businesses and impact the environment so negatively. I have yet to read a compelling argument to move forward on this project! For a fraction of the cost, a network of electric busses operating on the existing streets of West Seattle could reach most of the residents of our community and would make so much more sense.

PLEASE RECONSIDER INCLUDING THE WEST SEATTLE EXTENSION IN THE SOUND TRANSIT SYSTEM!

Thank you,

Maureen Rogers, (206)326-0200

3624 56th Ave SW, Seattle, 98116

Appendix C. Comments Received on the Final EIS and Responses

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1	<p>As a tax-paying resident of West Seattle, I cannot understand how Sound Transit can justify the billions of dollars to create a system that will benefit so few people and businesses and impact the environment so negatively. I have yet to read a compelling argument to move forward on this project! For a fraction of the cost, a network of electric busses operating on the existing streets of West Seattle could reach most of the residents of our community and would make so much more sense.</p> <p>PLEASE RECONSIDER INCLUDING THE WEST SEATTLE EXTENSION IN THE SOUND TRANSIT SYSTEM!</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Subject	Find a better way to spend \$7 billion than on WSLE
From	MartinWesterman
To	Email The Board
Sent	Thursday, October 10, 2024 1:57 PM
Attachments	<<ST Board comment 10-10-24.docx>>

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Greetings board members,

Choose the No Build option for WSLE. Opening day, you will have spent a quarter of a million taxpayer dollars per rider to get each passenger on that train. You know that – adding capital costs, interest payments, operations and maintenance costs, the price tag for WSLE will never drop below \$600 per rider. And you know that King County Metro Transit will cancel a bus route if it costs more than \$10 per rider.

Find a better way to improve transit in our three county region with \$7 billion than spending it on WSLE.

Martin Westerman / Seattle / 206-427-9039

This committee seems determined to recommend building a four-mile rail stub for \$7 billion dollars. Even though you know that the day it opens, you will have spent a quarter of a million taxpayer dollars per rider to get each passenger on that train. You know that – adding capital costs, interest payments, operations and maintenance costs, the price tag for WSLE will never drop below \$600 per rider. You also know that King County Metro Transit will cancel a bus route if it costs more than \$10 per rider.

Your own FEIS states that this rail stub will not reduce traffic congestion. It will not carry any more passengers in 20 years than buses carry today. It will set back economic development and equity progress by about ten years – because you know that station development benefits higher income residents, and penalizes lower income ones.

Your FEIS also says that Sound Transit will cut acres of forest, do irreparable harm to ecosystems, and generate a carbon footprint that won't get mitigated until the end of this century. So you know Sound Transit is helping prevent Seattle and King County from reaching their goals for tree canopy coverage and carbon neutrality in 2050.

But we know this board is only looking at the money. And last week, we had the pleasure of hearing the Transportation Choices Coalition tell us that money grows on trees. It grows on trees in our Congressional delegation's offices Washington, DC, and it grows on tax-paying trees in every household in the 5900 square miles of Snohomish, King and Pierce counties.

If we can just pick money off those trees, then let's pick off \$15 billion, and run this four-mile rail stub in a continuous tunnel from SODO, under the Duwamish River to West Seattle. Then, you can spend another \$15 billion or \$20 or \$25 billion to tunnel all the way to Burien and Renton. But that still won't reduce congestion, add riders, improve rider experience, or reduce the impacts of climate change.

Let's also recall that ST3 voters approved a plan to improve transit, and study light rail. Now that the study is complete, it is clear that WSLE light rail will not work for West Seattle. So voters approved an escape clause for you from unaffordable, unbuildable and infeasible projects. It's called Section 2, and you have already exercised it several times in ST2 and ST3.

And let's introduce some phrases here: opportunity cost and return on investment. What else could you spend \$7 billion on that would actually improve regional transit? It's what we all voted for in ST3.

Instead, we're trying to understand how we'll be getting worse transit, because of what looks like 15 voting members of this board, representing about 4 million people spread across nearly 5,900 square miles of three counties, letting themselves get pushed around by three board members from Seattle.

Appendix C. Comments Received on the Final EIS and Responses

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1	<p>Choose the No Build option for WSLE. Opening day, you will have spent a quarter of a million taxpayer dollars per rider to get each passenger on that train. You know that – adding capital costs, interest payments, operations and maintenance costs, the price tag for WSLE will never drop below \$600 per rider. And you know that King County Metro Transit will cancel a bus route if it costs more than \$10 per rider.</p> <p>Find a better way to improve transit in our three county region with \$7 billion than spending it on WSLE.</p> <p>Martin Westerman / Seattle / 206-427-9039</p> <p>Attached comment:</p> <p>This committee seems determined to recommend building a four-mile rail stub for \$7 billion dollars. Even though you know that the day it opens, you will have spent a quarter of a million taxpayer dollars per rider to get each passenger on that train. You know that – adding capital costs, interest payments, operations and maintenance costs, the price tag for WSLE will never drop below \$600 per rider. You also know that King County Metro Transit will cancel a bus route if it costs more than \$10 per rider.</p> <p>Your own FEIS states that this rail stub will not reduce traffic congestion. It will not carry any more passengers in 20 years than buses carry today. It will set back economic development and equity progress by about ten years – because you know that station development benefits higher income residents, and penalizes lower income ones.</p> <p>Your FEIS also says that Sound Transit will cut acres of forest, do irreparable harm to ecosystems, and generate a carbon footprint that won't get mitigated until the end of this century. So you know Sound Transit is helping prevent Seattle and King County from reaching their goals for tree canopy coverage and carbon neutrality in 2050.</p> <p>But we know this board is only looking at the money. And last week, we had the pleasure of hearing the Transportation Choices Coalition tell us that money grows on trees. It grows on trees in our Congressional delegation's offices Washington, DC, and it grows on tax-paying trees in every household in the 5900 square miles of Snohomish, King and Pierce counties.</p> <p>If we can just pick money off those trees, then let's pick off \$15 billion, and run this four-mile rail stub in a continuous tunnel from SODO, under the Duwamish River to West Seattle. Then, you can spend another \$15 billion or \$20 or \$25 billion to tunnel all the way to Burien and Renton. But that still won't reduce congestion, add riders, improve rider experience, or reduce the impacts of climate change.</p> <p>Let's also recall that ST3 voters approved a plan to improve transit, and study light rail. Now that the study is complete, it is clear that WSLE light rail will not work for West Seattle. So voters approved an escape clause for you from unaffordable, unbuildable and infeasible projects. It's called Section 2, and you have already exercised it several times in ST2 and ST3.</p> <p>And let's introduce some phrases here: opportunity cost and return on investment. What else could you spend \$7 billion on that would actually improve regional transit? It's what we all voted for in ST3.</p>	<p>Your support for the No Build Alternative has been noted.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>Instead, we're trying to understand how we'll be getting worse transit, because of what looks like 15 voting members of this board, representing about 4 million people spread across nearly 5,900 square miles of three counties, letting themselves get pushed around by three board members from Seattle.</p> <p>Your constituents voted in 2016 to improve bus transit, and study light rail. Instead, with a FEIS study that basically says do not build the West Seattle link extension, you are about to recommend building it anyway – for \$7 billion dollars.</p> <p>This is despite you knowing that the day it opens, you will have spent more than a million taxpayer dollars per rider to get each passenger on that train (based on ST's estimate of fewer than 6000 daily riders between 2032 opening and 2042 downtown link completion (when Metro will still be running the C, H and 21X bus lines). When the second tunnel and a link to downtown opens (for approximately \$5 more billion), per rider price will drop to \$500,000 for every passenger on the train. Then gradually, if ST ridership predictions are accurate (27,000 per day), per rider cost will eventually plateau at \$600 per rider in perpetuity (including ST capital, interest payment, operations and maintenance costs). Meanwhile, you know that King County Metro Transit will cancel a bus route if costs exceed \$10 per rider.</p> <p>Your FEIS also states that this rail stub will not reduce traffic congestion, it won't carry any more passengers in 20 years than buses carry today, and it will set back West Seattle economic development and equity progress by about ten years. You know that station development benefits higher income residents, and penalizes lower income ones.</p> <p>You also know that the WSLE carbon footprint won't get mitigated until at least 2080, and Sound Transit does not calculate loss of carbon sink from the acres of forest it will bulldoze. So Sound Transit will help prevent Seattle and King County from reaching their goals for tree canopy coverage and carbon neutrality in 2050.</p> <p>The grand plan for the WSLE is to eventually extend it to Burien and to Renton. Today and last week, the Transportation Choices Coalition has told us that a poorly-designed survey by a Sound Transit contractor found that 60% of people support WSLE. TCC also told us that money grows on trees – trees growing in our Congressional delegation's offices Washington, DC, and growing on tax-paying trees in every household in the 5900 square miles of Snohomish, King and Pierce counties. Apparently, this board is not looking at impacts or improving transit. It is only looking at cost. Does this committee actually believe that money grows on trees? If price is no object, let's spend \$20 billion and tunnel all the way from SODO, under the Duwamish River, to West Seattle Junction. And you can spend twice that amount for funneling to Burien.</p> <p>On the other hand – your constituents approved a plan to improve transit, and study light rail, for a \$1.75 billion budget. That FEIS study is now complete. And it makes clear that WSLE light rail will not work for West Seattle. So even though most voters do not realize this, when they voted in 2016, they approved an escape clause for you in ST3. Section 2 says if a project is unaffordable, unbuildable and/or infeasible, you can re-consider or cancel it. The WSLE is all three. You have already exercised the Section 2 option several times in ST2 and ST3.</p>	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>What else could you spend \$7 billion on that would actually improve regional transit in our three counties? The FEIS says WSLE will make transit worse. So we're trying to understand how it appears that 15 voting members of this board, representing about 4 million people spread across nearly 5,900 square miles of Snohomish, King and Pierce counties, are letting themselves get pushed around by three board members from Seattle. Perhaps it is time for the members who make up the majority of this board to push back.</p>	

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Subject	West Seattle Link Extension route selection
From	Nathan Rose
To	Email The Board
Sent	Thursday, October 10, 2024 4:28 PM

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To the Sound Transit Board,

I'm writing in advance of the Sound Transit board meeting on October 24th, where a decision will be made for the West Seattle Link Extension route.

The board must not accept the current preferred route without a full analysis of the options listed in the FEIS. In particular, I wish to advocate for the 'Eliminate Avalon' option. I live less than half a mile from where the station would be, so it would personally be very convenient for it to be built. However, given the escalating costs of the overall project, the savings from eliminating the station are a gift to the city. The FEIS lists this savings as being between 400 and 500 million dollars, depending on which alternative it is compared to. Given the growing costs elsewhere in the project, an opportunity to save money should not be overlooked.

While saving a huge amount of income, there is minimal negative impact from choosing the 'Eliminate Avalon' route. The difference in ridership is only 100 rides per day! Sound Transit has stated that the shorter time between the Junction and Delridge stations will actually increase ridership from the Junction, and even moreso once the line is extended further south in the future.

The 'Eliminate Avalon' route will also result in 10 fewer residential displacements and 38 fewer business displacements. This is a significant benefit that the board must consider. To be clear, my home is not at risk of displacements, and its proximity to the line is roughly the same with this route as with the preferred route. So my opinion here is not based on personal impact.

I watched the System Expansion Committee Meeting on the 10th of October and was disturbed to see that there was no discussion at all about the routes in West Seattle. It is absurd that multiple board members commented on the power lines in SoDo, but no-one discussed the residents and businesses in West Seattle. We deserve more than to be glossed over for the sake of expedience. There are real impacts to the choice of route; the difference in residential and business impact, as well as equity, are significantly different between each option. These need to be discussed in a deep and thorough way. Regardless of which route is ultimately chosen, I hope that in the upcoming meeting the board members will dig deep into these issues and actually consider their impacts rather than continue to vote for the status quo.

Thanks for your time.

Nathan Rose

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The board must not accept the current preferred route without a full analysis of the options listed in the FEIS. In particular, I wish to advocate for the 'Eliminate Avalon' option. I live less than half a mile from where the station would be, so it would personally be very convenient for it to be built. However, given the escalating costs of the overall project, the savings from eliminating the station are a gift to the city. The FEIS lists this savings as being between 400 and 500 million dollars, depending on which alternative it is compared to. Given the growing costs elsewhere in the project, an opportunity to save money should not be overlooked.</p> <p>While saving a huge amount of income, there is minimal negative impact from choosing the 'Eliminate Avalon' route. The difference in ridership is only 100 rides per day! Sound Transit has stated that the shorter time between the Junction and Delridge stations will actually increase ridership from the Junction, and even moreso once the line is extended further south in the future.</p> <p>The 'Eliminate Avalon' route will also result in 10 fewer residential displacements and 38 fewer business displacements. This is a significant benefit that the board must consider. To be clear, my home is not at risk of displacements, and its proximity to the line is roughly the same with this route as with the preferred route. So my opinion here is not based on personal impact.</p> <p>I watched the System Expansion Committee Meeting on the 10th of October and was disturbed to see that there was no discussion at all about the routes in West Seattle. It is absurd that multiple board members commented on the power lines in SoDo, but no-one discussed the residents and businesses in West Seattle. We deserve more than to be glossed over for the sake of expedience. There are real impacts to the choice of route; the difference in residential and business impact, as well as equity, are significantly different between each option. These need to be discussed in a deep and thorough way. Regardless of which route is ultimately chosen, I hope that in the upcoming meeting the board members will dig deep into these issues and actually consider their impacts rather than continue to vote for the status quo.</p>	<p>Your opposition to the Preferred Alternative and support for Alternatives DEL-7 and WSJ-6 has been noted.</p>

Subject	Light rail west Seattle
From	Gale Sketchley
To	Email The Board
Sent	Friday, October 11, 2024 4:52 PM

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Sent from my iPad. This was a foregone conclusion before the meeting convened. The preferred option was railroaded in without even discussing other options. What is this? The board needs to be accountable for lack of transparency. Just hold the meeting and tell everybody it's the preferred option that is going to happen. It appears that no consideration was given to the no build option. No one read the opposition just pushed through their pick and moved on. This is not ok. More voices will arise because of this deception!!! You are supposed to be for the people who elected you, all the citizens of west Seattle. Thoroughly disgusted. Gale Sketchley

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>This was a foregone conclusion before the meeting convened. The preferred option was railroaded in without even discussing other options. What is this? The board needs to be accountable for lack of transparency. Just hold the meeting and tell everybody it's the preferred option that is going to happen. It appears that no consideration was given to the no build option. No one read the opposition just pushed through their pick and moved on. This is not ok. More voices will arise because of this deception!!! You are supposed to be for the people who elected you, all the citizens of west Seattle.</p>	<p>Your comment has been noted.</p>

Subject	Westerman revised WSLE comments: Find a better way to spend \$7 billion than on WSLE
From	MartinWesterman
To	Email The Board
Sent	Saturday, October 12, 2024 8:48 AM
Attachments	<<ST Board comment 10-10-24.docx>>

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Thank you for receiving comments

Your constituents voted in 2016 to improve bus transit, and study light rail. Instead, with a FEIS study that basically says do not build the West Seattle link extension, you are about to recommend building it anyway – for \$7 billion dollars.

This is despite you knowing that the day it opens, you will have spent more than a million taxpayer dollars per rider to get each passenger on that train (based on ST's estimate of fewer than 6000 daily riders between 2032 opening and 2042 downtown link completion (when Metro will still be running the C, H and 21X bus lines). When the second tunnel and a link to downtown opens (for approximately \$5 more billion), per rider price will drop to \$500,000 for every passenger on the train. Then gradually, if ST ridership predictions are accurate (27,000 per day), per rider cost will eventually plateau at \$600 per rider in perpetuity (including ST capital, interest payment, operations and maintenance costs). Meanwhile, you know that King County Metro Transit will cancel a bus route if costs exceed \$10 per rider.

Your FEIS also states that this rail stub will not reduce traffic congestion, it won't carry any more passengers in 20 years than buses carry today, and it will set back West Seattle economic development and equity progress by about ten years. You know that station development benefits higher income residents, and penalizes lower income ones.

You also know that the WSLE carbon footprint won't get mitigated until at least 2080, and Sound Transit does not calculate loss of carbon sink from the acres of forest it will bulldoze. So Sound Transit will help prevent Seattle and King County from reaching their goals for tree canopy coverage and carbon neutrality in 2050.

The grand plan for the WSLE is to eventually extend it to Burien and to Renton. Today and last week, the Transportation Choices Coalition has told us that a poorly-designed survey by a Sound Transit contractor found that 60% of people support WSLE. TCC also told us that money grows on trees – trees growing in our Congressional delegation's offices Washington, DC, and growing on tax-paying trees in every household in the 5900 square miles of Snohomish, King and Pierce counties. Apparently, this board is not looking at impacts or improving transit. It is only looking at cost. Does this committee actually believe that money grows on trees? If price is no object, let's spend \$20 billion and tunnel all the way from SODO, under the Duwamish River, to West Seattle Junction. And you can spend twice that amount for funneling to Burien.

On the other hand – your constituents approved a plan to improve transit, and study light rail, for a \$1.75 billion budget. That FEIS study is now complete. And it makes clear that WSLE light rail will not work for West Seattle. So even though most voters do not realize this, when they voted in 2016, they approved an escape clause for you in ST3. Section 2 says if a project is unaffordable, unbuildable and/or infeasible, you can re-consider or cancel it. The WSLE is all three. You have already exercised the Section 2 option several times in ST2 and ST3.

What else could you spend \$7 billion on that would actually improve regional transit in our three counties? The FEIS says WSLE will make transit worse. So we're trying to understand how it appears that 15 voting members of this board, representing about 4 million people spread

across nearly 5,900 square miles of Snohomish, King and Pierce counties, are letting themselves get pushed around by three board members from Seattle. Perhaps it is time for the members who make up the majority of this board to push back.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Your constituents voted in 2016 to improve bus transit, and study light rail. Instead, with a FEIS study that basically says do not build the West Seattle link extension, you are about to recommend building it anyway – for \$7 billion dollars.</p> <p>This is despite you knowing that the day it opens, you will have spent more than a million taxpayer dollars per rider to get each passenger on that train (based on ST's estimate of fewer than 6000 daily riders between 2032 opening and 2042 downtown link completion (when Metro will still be running the C, H and 21X bus lines). When the second tunnel and a link to downtown opens (for approximately \$5 more billion), per rider price will drop to \$500,000 for every passenger on the train. Then gradually, if ST ridership predictions are accurate (27,000 per day), per rider cost will eventually plateau at \$600 per rider in perpetuity (including ST capital, interest payment, operations and maintenance costs). Meanwhile, you know that King County Metro Transit will cancel a bus route if costs exceed \$10 per rider.</p> <p>Your FEIS also states that this rail stub will not reduce traffic congestion, it won't carry any more passengers in 20 years than buses carry today, and it will set back West Seattle economic development and equity progress by about ten years. You know that station development benefits higher income residents, and penalizes lower income ones.</p> <p>You also know that the WSLE carbon footprint won't get mitigated until at least 2080, and Sound Transit does not calculate loss of carbon sink from the acres of forest it will bulldoze. So Sound Transit will help prevent Seattle and King County from reaching their goals for tree canopy coverage and carbon neutrality in 2050.</p> <p>The grand plan for the WSLE is to eventually extend it to Burien and to Renton. Today and last week, the Transportation Choices Coalition has told us that a poorly-designed survey by a Sound Transit contractor found that 60% of people support WSLE. TCC also told us that money grows on trees – trees growing in our Congressional delegation's offices Washington, DC, and growing on tax-paying trees in every household in the 5900 square miles of Snohomish, King and Pierce counties. Apparently, this board is not looking at impacts or improving transit. It is only looking at cost. Does this committee actually believe that money grows on trees? If price is no object, let's spend \$20 billion and tunnel all the way from SODO, under the Duwamish River, to West Seattle Junction. And you can spend twice that amount for funneling to Burien.</p> <p>On the other hand – your constituents approved a plan to improve transit, and study light rail, for a \$1.75 billion budget. That FEIS study is now complete. And it makes clear that WSLE light rail will not work for West Seattle. So even though most voters do not realize this, when they voted in 2016, they approved an escape clause for you in ST3. Section 2 says if a project is unaffordable, unbuildable and/or infeasible, you can re-consider or cancel it. The WSLE is all three. You have already exercised the Section 2 option several times in ST2 and ST3.</p> <p>What else could you spend \$7 billion on that would actually improve regional transit in our three counties? The FEIS says WSLE will make transit worse. So we're trying to understand how it appears that 15 voting members of this board, representing about 4 million people spread across nearly 5,900 square miles of Snohomish, King and Pierce counties, are letting themselves get pushed around by three board members from Seattle. Perhaps it is time for the members who make up the majority of this board to push back.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>

Subject	NO BUILD for West Seattle light rail
From	Marsha Lubetkin
To	Email The Board
Sent	Tuesday, October 15, 2024 5:13 PM

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Dear Mr. Riker,

I am asking you to please vote NO BUILD for West Seattle light rail.
The cost has become prohibitive & will only go up. This was not what the voters approved in 2016.
Trains are not needed to get West Seattleites to SODO. Buses work well with no huge costs & disruption.
Please vote NO BUILD!

Sincerely,
Marsha Lubetkin

Sent from my iPad

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I am asking you to please vote NO BUILD for West Seattle light rail.</p> <p>The cost has become prohibitive & will only go up. This was not what the voters approved in 2016.</p> <p>Trains are not needed to get West Seattleites to SODO. Buses work well with no huge costs & disruption.</p> <p>Please vote NO BUILD!</p>	<p>Your support for the No Build Alternative has been noted.</p>

Subject	West Seattle Light Rail Extension: NO BUILD OPTION
From	Cory Gooch
To	Email The Board
Sent	Friday, October 18, 2024 2:18 PM

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Dear Mark Riker,

I am writing to members of the Sound Transit Board of Directors to express my dismay at the pending plans for the West Seattle Light Rail extension. The incredibly high, continually soaring costs and the widespread disruption that the construction will cause for our community outweigh any benefits, in my opinion.

Besides the destruction or disruption to an estimated 70 businesses and residences, the current plans will destroy important tree canopy, including a heron roost, around Pigeon Point and the north end of Longfellow Creek.

Far less money could be spent for improving public transit opportunities for West Seattleites. One example: Build a decent bus shelter on Lander Street in SODO so that those of us who want to use public transit to return home from SEA/TAC airport have a sheltered spot to await the #50 Metro bus.

Another example: Route the Rapid Ride C bus at the northern end of West Seattle so that it takes a very slight detour and stops on SW Spokane Street before getting onto the WS Bridge. This would allow folks like myself who live north of the Alaska Junction to park our cars (where there are ample, empty spots on Spokane) and utilize the Rapid Ride system, thus increasing ridership for an existing transit system. The sheltered bus stop and the available parking spots are already there!

These are just two examples of how money could be spent in far less costly and less disruptive ways to improve transit for West Seattle.

The thought of enduring the years of construction, with the related losses and disruptions, and knowing the HUGE costs involved (billions and billions of dollars!), makes me want to just pack up and leave this community after living here for over 20 years. I urge you to consider the No Build Option.

Yours sincerely,

Corliss Gooch
6215 SW Admiral Way
Seattle 98116

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The incredibly high, continually soaring costs and the widespread disruption that the construction will cause for our community outweigh any benefits, in my opinion.</p> <p>Besides the destruction or disruption to an estimated 70 businesses and residences, the current plans will destroy important tree canopy, including a heron roost, around Pigeon Point and the north end of Longfellow Creek.</p> <p>Far less money could be spent for improving public transit opportunities for West Seattleites. One example: Build a decent bus shelter on Lander Street in SODO so that those of us who want to use public transit to return home from SEA/TAC airport have a sheltered spot to await the #50 Metro bus.</p> <p>Another example: Route the Rapid Ride C bus at the northern end of West Seattle so that it takes a very slight detour and stops on SW Spokane Street before getting onto the WS Bridge. This would allow folks like myself who live north of the Alaska Junction to park our cars (where there are ample, empty spots on Spokane) and utilize the Rapid Ride system, thus increasing ridership for an existing transit system. The sheltered bus stop and the available parking spots are already there!</p> <p>These are just two examples of how money could be spent in far less costly and less disruptive ways to improve transit for West Seattle.</p> <p>The thought of enduring the years of construction, with the related losses and disruptions, and knowing the HUGE costs involved (billions and billions of dollars!), makes me want to just pack up and leave this community after living here for over 20 years. I urge you to consider the No Build Option.</p>	<p>Your support for the No Build Alternative has been noted.</p>

Subject	Please vote no on WSLE
From	Margaret Fredrick
To	Email The Board; Meeting Comments; Roscoe, Kim; millar@wsdot.wa.gov; franklyn@everettwa.gov; Somers, Dave; Backus, Nancy; Balducci, Claudia; mayor@lynnwoodwa.gov; Angela Birney; Jim Kastama; Prince, Ed; dan.strauss@soundtransit.org; Upthegrove, Dave; Walker, Kristina; von Reichbauer, Pete; Zahilay, Girmay; Rhonda.Lewis@Kingcounty.gov; Community Oversight Panel
Sent	Friday, October 18, 2024 11:54 PM

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Dear board members of Sound Transit,

I am a west seattle resident who is concerned about the proposed light rail extension in our area.the WSLE will have several negative impacts on the region, as explored in Rethink The Link's EIS-C document. A few of particular concern to me are as follows:

To build the extension, 3 acres of Pigeon Point Forest and 1-3 acres of of the West Duwamish Greenbelt will be cleared, which will also disturb the FEDERALLY RECOGNIZED heron rookery nearby. Great Blue Herons are also recognized by the Washington Department of Fish and wildlife as a "Priority Species" due to their sensitivity to habitat alteration.

The light rail will be built over Longfellow Creek, which will disturb the recovering salmon and beavers populations that reside there.

Is is estimated that the extension will displace approx. 133 businesses and 1,230 people. 165-173 residential homes would also be demolished.

The Cettolin House, which has been given historical landmark status, would also be in danger of demolition.

These are just a few of my concerns for a project that will take us only as far as SODO and will not increase rider numbers in general. The \$7 Billion+ in finances would be much better spent in strengthening the transit system we already have. So please consider moving forward with the No Build Option. It is a much more practical and sustainable option.

Thank you for your time,

Margaret Fredrick

Appendix C. Comments Received on the Final EIS and Responses

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1	<p>the WSLE will have several negative impacts on the region, as explored in Rethink The Link's EIS-C document. A few of particular concern to me are as follows:</p> <p>To build the extension, 3 acres of Pigeon Point Forest and 1-3 acres of of the West Duwamish Greenbelt will be cleared, which will also disturb the FEDERALLY RECOGNIZED heron rookery nearby. Great Blue Herons are also recognized by the Washington Department of Fish and wildlife as a "Priority Species" due to their sensitivity to habitat alteration.</p> <p>The light rail will be built over Longfellow Creek, which will disturb the recovering salmon and beavers populations that reside there.</p> <p>Is is estimated that the extension will displace approx. 133 businesses and 1,230 people. 165-173 residential homes would also be demolished.</p> <p>The Cettolin House, which has been given historical landmark status, would also be in danger of demolition.</p> <p>These are just a few of my concerns for a project that will take us only as far as SODO and will not increase rider numbers in general. The \$7 Billion+ in finances would be much better spent in strengthening the transit system we already have. So please consider moving forward with the No Build Option. It is a much more practical and sustainable option.</p>	<p>Your support for the No Build Alternative has been noted.</p>

From: Dan Kennedy <dankennedypnw@gmail.com>;

Received: Wed Oct 23 2024 14:27:28 GMT-0700 (Pacific Daylight Time)

To: Sound Transit Agency <main@soundtransit.org>; RTA Main Mailbox <main@soundtransit.org>; RTA Main Mailbox <main@soundtransit.org>; CS Main <main@soundtransit.org>;

Subject: WS Transit

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Just another voice to say that the West Seattle transit plans should be downsized to save homes, businesses and jobs like mine. Thanks.—Dan Kennedy
Sent from my iPhone

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	Just another voice to say that the West Seattle transit plans should be downsized to save homes, businesses and jobs like mine.	Your opposition to the West Seattle Link Extension has been noted.

Sound Transit Projects

Details	Communication
#555690 Date Recieved: 10/24/2024 Created by: Maddie Dewhirst Audience: Type of Draft EIS comment: Reach: Participation: Engagement: Source: Email Assigned division: Outreach Category: Project Phase: Planning Project Segment: West Seattle and Ballard: West Seattle Environmental phase:	<p>To Whom it May Concern,</p> <p>I am writing in regards to the West Seattle Light Rail plan. As a fourth generation West Seattleite, I'd like to express my strong opposition to the plan and request the No Build option, as well as request that the money be used to improve our West Seattle roads and existing public transportation instead.</p> <p>I oppose the plan for the following reasons:</p> <ul style="list-style-type: none"> Displacement of residents. To my knowledge, it is estimated that approximately 500 people will be displaced. Regardless of the plan to assist and reimburse these residents, these are members of our community! Each is living their own unique life, including possibly facing illness or other hardship. It's inhumane to force people out of their homes regardless of the money. Additionally, West Seattle is in the midst of an affordable housing crisis. Where will these people be moved to? Disruption (and possibly the demise) of our businesses. The businesses that will be impacted by this plan have immeasurable value to the community. It's folly to think that one of the largest childcare centers in Seattle or a health club that serves more than 6,000 people, will survive. The space and cost to re-establish those businesses elsewhere in West Seattle is just not realistic, not to mention the very real negative impact on real people if the businesses close. As a member of the West Seattle Health Club, I see first-hand how important the community at the club is and how essential it is to have a facility that is equipped to support the fitness needs of young, old, injured, healthy...the list goes on. Again, these are human beings that rely on the social interaction and the exercise. Where is the 75 year old woman who comes to water aerobics everyday going to go? Destruction of our ecosystems. We have written goals as a city to preserve our trees, mitigate climate change, rejuvenate our creeks, protect our wildlife! We are responsible for this. It is our moral obligation to do everything we can to ensure the health of our ecosystems. Without healthy air and water, humans cannot survive. Building the light rail will not improve peoples' quality of life, as the carbon emitted from the project and the loss of carbon sequestering trees will surely have an adverse effect on our air quality; not to mention the noise pollution. Where will the Herons of Pidgeon Point go? What will the fish do when they come back to Longfellow Creek and it's full of more run-off? Those are just two examples, but I strongly believe that the loss will be more than the gain. Cost and duration of the project. \$4 Billion Dollars! I know it's naïve of me to say, but don't we have other, more pressing issues in our city that that money could go to? I don't fully understand how money gets allocated, but I will assume that this money must be used for something related to infrastructure and/or transportation. So, we can't use it to help solve the homelessness problem or drug addiction problem we have in this city, but surely it can be used to improve our current infrastructure, including our crumbling streets. <p>I believe the prolonged chaos of this multi-year project will have devastating effects on our community. More tempers will flare in an already volatile driving environment, people will be dissuaded to come to West Seattle for the many fun events and sights, and the tension that built during the pandemic and over the past several years will be scratched like an old scab as people have to drastically change their routes and times to get anywhere. Will there be adequate support for SPD to direct traffic and handle the inevitable road rage and accidents?</p> <p>It's too much to ask of this community! I'm all for change, but the sick feeling I have deep in my gut is that West Seattle will be changed forever; from the small, familiar neighborhood that my Great Grandfather homesteaded in and has remained relatively the same in my 57 years (aside from the massive influx of people and housing) to a generic "hot spot" with the shadow of this cement monolith obscuring the beauty of this neighborhood. Trees, people, fish, birds, communities, gone, including me. Sadly, I won't be able to stay and witness the destruction.</p> <p>Please do not move forward with this project. I vote No Build and you will not get my vote in the future if you vote pro-build.</p> <p>Sincerely, Kirsten Whitemore 3715 41st Ave SW / 206-227-8740</p>

Appendix C. Comments Received on the Final EIS and Responses

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1	<p>I am writing in regards to the West Seattle Light Rail plan. As a fourth generation West Seattleite, I'd like to express my strong opposition to the plan and request the No Build option, as well as request that the money be used to improve our West Seattle roads and existing public transportation instead.</p> <p>I oppose the plan for the following reasons:</p> <p>Displacement of residents. To my knowledge, it is estimated that approximately 500 people will be displaced. Regardless of the plan to assist and reimburse these residents, these are members of our community! Each is living their own unique life, including possibly facing illness or other hardship. It's inhumane to force people out of their homes regardless of the money. Additionally, West Seattle is in the midst of an affordable housing crisis. Where will these people be moved to?</p> <p>Disruption (and possibly the demise) of our businesses. The businesses that will be impacted by this plan have immeasurable value to the community. It's folly to think that one of the largest childcare centers in Seattle or a health club that serves more than 6,000 people, will survive. The space and cost to re-establish those businesses elsewhere in West Seattle is just not realistic, not to mention the very real negative impact on real people if the businesses close. As a member of the West Seattle Health Club, I see first-hand how important the community at the club is and how essential it is to have a facility that is equipped to support the fitness needs of young, old, injured, healthy...the list goes on. Again, these are human beings that rely on the social interaction and the exercise. Where is the 75 year old woman who comes to water aerobics everyday going to go?</p> <p>Destruction of our ecosystems. We have written goals as a city to preserve our trees, mitigate climate change, rejuvenate our creeks, protect our wildlife! We are responsible for this. It is our moral obligation to do everything we can to ensure the health of our ecosystems. Without healthy air and water, humans cannot survive. Building the light rail will not improve peoples' quality of life, as the carbon emitted from the project and the loss of carbon sequestering trees will surely have an adverse effect on our air quality; not to mention the noise pollution. Where will the Herons of Pidgeon Point go? What will the fish do when they come back to Longfellow Creek and it's full of more run-off? Those are just two examples, but I strongly believe that the loss will be more than the gain.</p> <p>Cost and duration of the project. \$4 Billion Dollars! I know it's naïve of me to say, but don't we have other, more pressing issues in our city that that money could go to? I don't fully understand how money gets allocated, but I will assume that this money must be used for something related to infrastructure and/or transportation. So, we can't use it to help solve the homelessness problem or drug addiction problem we have in this city, but surely it can be used to improve our current infrastructure, including our crumbling streets.</p> <p>I believe the prolonged chaos of this multi-year project will have devastating effects on our community. More tempers will flare in an already volatile driving environment, people will be dissuaded to come to West Seattle for the many fun events and sights, and the tension that built during the pandemic and over the past several years will be scratched like an old scab as people have to drastically change their routes and times to get anywhere. Will there be adequate support for SPD to direct traffic and handle the inevitable road rage and accidents?</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Subject	10/24/2024 Full Board Comments: Oppose West Seattle Link Project To Be Built
From	Stephen A. Fesler
To	Meeting Comments; Email The Board
Sent	Thursday, October 24, 2024 12:56 PM

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Boardmembers:

I am asking you today to reject the proposal to select a project for the West Seattle Link extension and I say that as somebody who rides public transportation, strongly supports regional transit expansion, Sound Transit 3, and somebody who is a journalist that covers this stuff.

Unfortunately, the project that we're being asked to build here is the wrong version of the West Seattle Link extension. It is a gold plated version. It is the most expensive option on the table, and it is an option that we should not be exercising.

I recognize that there's a lot of opposition to this project entirely, and I'm not telling you to never do this project, but the option that we're looking at has seen costs rise so rapidly, well beyond inflation, and it has everything to do with the choices that this board has made over time to keep more costs onto the project.

You know, the technical advisory group that this board has commissioned is right that you need to be making decisions quickly, but you also need to be making the correct decisions. And that is not happening. And this motion today is not the correct decision.

There are better ways to do this project. We can do it as an elevated alignment. We can do it cheaper than what the consultants and staff have proposed by limiting its bounds within the street.

But you know, when we're seeing costs for the ST3 program rise many times, even controlling for inflation, to what voters approved in 2016, the only way that we can deal with that is by delaying projects. I know there's a wishful thinking that, Oh, if we just do a different bidding process, we'll save some money. Oh, if we do some value engineering here and there, we'll save some money. You will probably will but, you're not going to end up reducing the cost of these projects by half to within their budgets. It's just not reality.

And unfortunately, West Seattle is the canary in the coal mine because we know that not only has this project risen to astronomical levels -- three times the cost per rider of Ballard Link -- and the Ballard Link extension itself is going to \$20 billion up from \$11 billion something. We are really out of bounds and being able to afford the most gold plated options with ST3. And my big fear is, if we continue down this road of always selecting the most expensive project design alternatives for every single project, because that's the politically expedient thing is, we will never be able to afford ST3. We will never complete ST3.

Vote no today.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I am asking you today to reject the proposal to select a project for the West Seattle Link extension and I say that as somebody who rides public transportation, strongly supports regional transit expansion, Sound Transit 3, and somebody who is a journalist that covers this stuff. Unfortunately, the project that we're being asked to build here is the wrong version of the West Seattle Link extension. It is a gold plated version. It is the most expensive option on the table, and it is an option that we should not be exercising.</p> <p>I recognize that there's a lot of opposition to this project entirely, and I'm not telling you to never do this project, but the option that we're looking at has seen costs rise so rapidly, well beyond inflation, and it has everything to do with the choices that this board has made over time to keep more costs onto the project.</p> <p>You know, the technical advisory group that this board has commissioned is right that you need to be making decisions quickly, but you also need to be making the correct decisions. And that is not happening. And this motion today is not the correct decision.</p> <p>There are better ways to do this project. We can do it as an elevated alignment. We can do it cheaper than what the consultants and staff have proposed by limiting its bounds within the street.</p> <p>But you know, when we're seeing costs for the ST3 program rise many times, even controlling for inflation, to what voters approved in 2016, the only way that we can deal with that is by delaying projects. I know there's a wishful thinking that, Oh, if we just do a different bidding process, we'll save some money. Oh, if we do some value engineering here and there, we'll save some money. You will probably will but, you're not going to end up reducing the cost of these projects by half to within their budgets. It's just not reality.</p> <p>And unfortunately, West Seattle is the canary in the coal mine because we know that not only has this project risen to astronomical levels -- three times the cost per rider of Ballard Link - - and the Ballard Link extension itself is going to \$20 billion up from \$11 billion something. We are really out of bounds and being able to afford the most gold plated options with ST3. And my big fear is, if we continue down this road of always selecting the most expensive project design alternatives for every single project, because that's the politically expedient thing is, we will never be able to afford ST3. We will never complete ST3.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>

Subject	West Seattle Link
From	Candace Shattuck
To	Email The Board
Sent	Thursday, October 24, 2024 10:21 AM

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Sound Transit is trying to put the cart before the horse. Sound Transit should respond to the constructive criticism which has been offered and account for the budget BEFORE they are allowed to proceed, not while the project is underway. The eight-year-old “approvals” are pretty stale at this point. Please vote NO or NO BUILD on Motion 2024-59.

Candace Shattuck
2745 California Ave SW, Apt 435
Seattle, WA 98116
410-725-1240

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	Sound Transit is trying to put the cart before the horse. Sound Transit should respond to the constructive criticism which has been offered and account for the budget BEFORE they are allowed to proceed, not while the project is underway. The eight-year-old "approvals" are pretty stale at this point. Please vote NO or NO BUILD on Motion 2024-59.	Your opposition to the West Seattle Link Extension and support of the No Build Alternative has been noted.

Subject	I strongly oppose the demolition of the West Seattle Health Club and nearby small businesses
From	Christine Cranston
To	Meeting Comments; Email The Board
Sent	Thursday, October 24, 2024 10:10 AM

Some people who received this message don't often get email from cpcranston@gmail.com. [Learn why this is important](#)

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IMPORTANT AND URGENT: Please do not destroy the West Seattle Health Club. It's a core healthy part of the West Seattle community.

As a member of health clubs in that location for over 20 years, **I strongly oppose that decision.** The removal of the West Seattle Health Club would not only result in the loss of a gym but also displace a large community of over 6200 members and over 100 employees who travel to West Seattle and support the businesses in the area.

I love the West Seattle Health club because it includes all ages - from infants to 90 year olds - and it has a very wide range of healthy exercise options for all levels of fitness. It's also a racially, ethnically, economically, and sexual orientation diverse community. The teachers are excellent - knowledgeable and great examples of living a healthy lifestyle. I was a member of the club back when it was All Star Fitness. As of now, I enjoy the Pilates classes and the weights. I have friends at the club and acquaintances that it's a joy to see every week. The club is an antidote to the isolation and loneliness that many people are experiencing now. As you may know, physical exercise is one of the best ways to reduce mental and emotional health issues. So is community.

The club has a huge building with lots of space. It also has plenty of free parking. It would be prohibitively expensive and totally disruptive to move it to another location. Plus, there is no space left in West Seattle.

PLEASE CHANGE YOUR PLANS FOR WEST SEATTLE LIGHT RAIL SO IT DOES NOT NEGATIVELY AFFECT THE WEST SEATTLE HEALTH CLUB.

Thank you, Christine

Christine Cranston

cpcranston@gmail.com

<https://www.linkedin.com/in/christinecranston/>

206.355.7811

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>IMPORTANT AND URGENT: Please do not destroy the West Seattle Health Club. It's a core healthy part of the West Seattle community.</p> <p>As a member of health clubs in that location for over 20 years, I strongly oppose that decision. The removal of the West Seattle Health Club would not only result in the loss of a gym but also displace a large community of over 6200 members and over 100 employees who travel to West Seattle and support the businesses in the area.</p> <p>I love the West Seattle Health club because it includes all ages - from infants to 90 year olds - and it has a very wide range of healthy exercise options for all levels of fitness. It's also a racially, ethnically, economically, and sexual orientation diverse community. The teachers are excellent - knowledgeable and great examples of living a healthy lifestyle. I was a member of the club back when it was All Star Fitness. As of now, I enjoy the Pilates classes and the weights. I have friends at the club and acquaintances that it's a joy to see every week. The club is an antidote to the isolation and loneliness that many people are experiencing now. As you may know, physical exercise is one of the best ways to reduce mental and emotional health issues. So is community.</p> <p>The club has a huge building with lots of space. It also has plenty of free parking. It would be prohibitively expensive and totally disruptive to move it to another location. Plus, there is no space left in West Seattle.</p> <p>PLEASE CHANGE YOUR PLANS FOR WEST SEATTLE LIGHT RAIL SO IT DOES NOT NEGATIVELY AFFECT THE WEST SEATTLE HEALTH CLUB</p>	<p>Sound Transit has adjusted alternatives during conceptual design to avoid or minimize impacts, including property acquisitions, to the extent possible. Refinement of project design will continue throughout final design.</p>

Subject	Vote No on Motion 2024-59
From	michael@lgbtqa.com
To	Harrell, Bruce; Roscoe, Kim; millar@wsdot.wa.gov; nwpublicaffairs@wsdot.wa.gov; franklin@everettwa.gov; Somers, Dave; Backus, Nancy; Balducci, Claudia; Angela Birney; mayor@lynnwoodwa.gov; Prince, Ed; Strauss, Dan; dan.strauss@soundtransit.org; Upthegrove, Dave; Walker, Kristina; von Reichbauer, Pete; Zahilay, Girmay; rhonda.lewis@kingcounty.gov; Email The Board; Community Oversight Panel
Sent	Wednesday, October 23, 2024 6:03 PM

Some people who received this message don't often get email from michael@lgbtqa.com. [Learn why this is important](#)

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Hello, electeds and others,

I am indeed a fan of light rail and voted for it in 2016, but from everything I have seen, read, and heard about this current plan, it is genuinely absurd. Worse, it's highly irresponsible. Some of it is even borderline ethical. And for HOW MUCH?

You know the facts. I can't believe no one on the board of directors has the chutzpah to stand up the truth.

It only takes one first "NO" to show others it's ok to do the right thing and you've got their back.

Be that leader! **Please vote No on Motion 2024-59** and support the **NO BUILD** option.

This project needs to go back to the drawing board.

Michael Woodward
4511 35th Avenue SW
Apartment 406
Seattle, WA 98126

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I am indeed a fan of light rail and voted for it in 2016, but from everything I have seen, read, and heard about this current plan, it is genuinely absurd. Worse, it's highly irresponsible. Some of it is even borderline ethical. And for HOW MUCH?</p> <p>You know the facts. I can't believe no one on the board of directors has the chutzpah to stand up the truth.</p> <p>It only takes one first "NO" to show others it's ok to do the right thing and you've got their back.</p> <p>Be that leader! Please vote No on Motion 2024-59 and support the NO BUILD option.</p> <p>This project needs to go back to the drawing board.</p>	<p>Your opposition to the West Seattle Link Extension and support of the No Build Alternative has been noted.</p>

From: MartinWesterman <artartart@seanet.com>
Sent: Friday, January 24, 2025 5:36 AM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Re: Do NOT move WSLE to "design" phase: Comment to ST board 10/24/2024

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Thank you! ST Information Security

Good morning,

Please also enter my comment in the WSLE record of decision.

Thank you,
Martin Westerman

On Oct 28, 2024, at 11:28 AM, Email The Board <EmailTheBoard@soundtransit.org> wrote:

Good morning,

On behalf of the Sound Transit Board of Directors, thank you for your message concerning the West Seattle light rail project. Your comment was provided to the Board following the meeting and forwarded to our West Seattle project team for consideration.

Josephine Gamboa
Program Manager-Board Administration
Executive Department, Sound Transit
Pronouns: she/her

From: MartinWesterman <artartart@seanet.com>
Sent: Thursday, October 24, 2024 1:31 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Cc: Zahilay, Girmay <girmay.zahilay@kingcounty.gov>; Teresa Mosqueda <teresa.mosqueda@kingcounty.gov>; Rob Saka <rob.saka@seattle.gov>; Strauss, Dan <Dan.Strauss@seattle.gov>; Harrell, Bruce <Bruce.Harrell@Seattle.gov>; Rudolph, Catherine <catherine.rudolph@piercecountywa.gov>; Dave.Somers@co.snohomish.wa.us; Franklin, Cassie <cfranklin@everettwa.gov>
Subject: Do NOT move WSLE to "design" phase: Comment to ST board 10/24/2024

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Greetings esteemed leaders,

We ask the board to vote NO on moving WSLE to “design phase.”

Every time you use “the voters have spoken” as your rationale for proceeding with WSLE, you know that your voters did NOT approve this in the 2016 ST3 package. They approved a WSBL package that would improve transit, and study light rail. Sound Transit has not used ST3 money yet to improve transit in the three-county region. Sound Transit HAS generated a light rail study, that found WSLE will not improve transit ridership, reduce congestion, or contribute to social justice and economic development. It will irreparably damage the environment, exacerbate heat islands, create food deserts and not improve transit deserts between SODO and the West Seattle Junction.

The board has been acting as if costs are irrelevant to this project. In fact, Motion 2024-59 directs ST’s CEO to shift WSLE baseline costs to make the project, which is \$5 billion over what voters approved in 2016, appear more affordable over a longer term than voters approved. We urge you to vote NO on this motion.

You have all received our FEIS document, assembled by regional transit experts, and attached again here. Appendix 8 is a consulting document that found three factors driving excessive U.S. transit project costs. It provides warnings for ST, and guidance on how to avoid pitfalls that add approximately 85% to transportation costs:

- Lack of design standardization — leading to fewer economies of scale, inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process.
- Labor costs: about 40-60% of US projects' hard costs, vs. labor costs in other countries studied (Turkey, Italy, and Sweden), that ranged from 19%-30% with Sweden as highest-wage case at 23%.
- U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher; and extra money for red tape, wasted contingencies, paying workers during delays, defensive design, and profit.

Are WSLE economics irrelevant to this board? Are you believing what Transportation Choices Coalition has told you — that money grows on trees? The term “affordable schedule” should be meaningful in the WSLE EIS process: you should be understanding that taxpayer funds and patience are limited, especially as WSLE is now 3 times more expensive than voters approved in 2016, and per costs have climbed to \$1.3 million /rider.

I urge you to stop using my 2016 approval vote on ST3, for \$1.75 billion, as your excuse for proceeding with WSLE alone for \$7 billion. For that cost, you could electrify the entire Metro Transit fleet in King County, and improve transit across three counties. You remind me of an old joke about two women eating in a restaurant. One says, “This food is terrible,” and the other says, “And such tiny portions!” For a terrible WSLE proposal, we get so little public transit.

All the best on your reaching better transit decisions than you have been making so far,

Martin Westerman, West Seattle / 206-427-9039
Regional Transit Partners

Attachment: FEIS-C

West Seattle Light Rail Environmental Impact Statement-Conclusion (EIS-C)

An independent assessment of the environmental impact
of the Sound Transit West Seattle-Link Extension (WSLE) light rail proposal

Submitted by Rethink The Link (RTTL) and Regional Transit Colleagues

Revision 4.8 October 19, 2024

Comments or Questions? Contact RTTL at email contact@rethinkthelink.org

Section 1: Executive Summary

The Ballard-West Seattle light rail discussion started from the premise that roadway-based modes could not handle peak period passenger demand in that corridor. Thus, in 2016, Sound Transit presented a Ballard-West Seattle link extension (WSBLE) light rail proposal in its ST3 transportation package. It offered simple criteria for voters to consider:

- improve public transit,
- encourage economic development, equity, community-building and social justice,
- protect the environment.

Sound Transit's January 2022 WSBLE Draft Environmental Impact Statement (DEIS) was designed to show that:

- these simple criteria would be satisfied, and
- WSBLE's proposed advantages would outweigh its disadvantages.

The DEIS combined both West Seattle and Ballard light rail segments into one project routed through downtown Seattle. But changes to the Ballard portion required additional work. So Sound Transit and the USDOT Federal Transit Administration decided to separate them into two projects, move forward with a separate environmental review for the West Seattle (WSLE) portion, and delay review for the Ballard portion.

Since then, independent transit experts have researched and analyzed information from the West Seattle sections of the WSBLE DEIS, public comments submitted about the DEIS, the Final EIS released September 20th, and additional public transit research findings. **Since the 2016 ST3 vote, Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE.** With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension (WSLE) does not satisfy the ST3 and DEIS criteria, and should not be built. The experts found that:

- WSLE transit times and therefore ridership will degrade, not improve West Seattle transit service after the WSLE and Ballard LE open in 2032 and 2042 respectively
- The construction generation of carbon will be more than carbon-reducing impacts of WSLE trains can mitigate over five future decades of WSLE operation.
- Acres of forest and habitat will be eliminated, and much more of it irreparably damaged
- Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network:

- Economic development in West Seattle and Chinatown-International District will be set back for at least a decade
- Equity, community-building and social justice will be set back at least a decade,
- And raising the question, based upon the newest, September 2024 WSLE cost estimate: “How can six to seven billion dollars be better spent to improve public transit?”

The Sound Transit Board can and should choose the No Build option for the WSLE.

- [Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016](#), allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.
- ST Executive Corridor Director Cahill Ridge’s told the November 2017 West Seattle Transportation Coalition public meeting that ST “has no Plan B” for WSLE if financial, disruptive technology or other factors arise. He was incorrect. ST has several Plan B options available.
- Lower carbon, less expensive and less destructive public transit options than WSLE have been studied by Sound Transit, are available and serving West Seattle riders better now than rail will in the future, including but not limited to:
 - a. Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane
 - b. Add north and south Busway exits from east end of West Seattle Bridge
 - c. Add to exclusive bus lanes in West Seattle
 - d. Complete Metro Transit initiative to electrify bus fleet
- No Build is a legitimate, legal, and responsible choice, included under federal and state law in all environmental reviews of large, disruptive transit construction projects. ST3 project sponsors can and should consider this option and should note that the facts overall point to selection of No Build.

This document addresses the West Seattle link extension specifically, and the WSLE generally. It contributes summary information to the decision-making processes for:

- a. local and state government officials who regulate and influence Sound Transit decision making, and
- b. citizens who pay significant taxes (see “revenues vs. costs” below) to fund Sound Transit, in the expectation that their government will provide improved mobility services.
- c. Government decision makers who have to decide what the WSLE Record of Decision (ROD) will finally state as the result of the environmental process for WSLE.

Section 2: Current Transit Ridership and Forecasts for West Seattle-Downtown Corridor, and Region

1. **The WSLE light rail plan will not improve transit or rider experience on the Downtown-West Seattle corridor. It will make them worse.**
 - a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though heavy traffic may cause it to take longer.
 - b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see “transfer penalty” in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer.

- c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers.
2. **Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.**
- a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.
 - b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)
 - i. The FEIS sorts ridership forecasts based on several options:
 - (a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built
 - (b) Two station scenario, without Avalon station
 - (c) Three station scenario with Delridge, Avalon and Junction stations
 - ii. Appendix 2 of [Sound Transit's Transportation Technical Report](#) shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.
 - c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day.
 - d. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.
 - i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix, **Per Capita Transit Ridership Is Declining**).
3. **[Sound Transit is not building what voters approved](#) as ST3 in 2016:**
- a. Voters are getting a different rail plan than Sound Transit presented as ST3 in 2016:
 - i. The original Ballard-West Seattle line (WSBLE) is now two separate lines – BLE and WSLE
 - ii. **The \$1.7 billion ST3 budget for WSLE is now \$6-\$7 billion.** Listed Rapid Ride corridor improvements have not been made, and its 2030 delivery date will not be met.
 - iii. The ST3 proposal did not describe Pigeon Point deforestation, "irreparable" habitat damage, or any notice of a large carbon footprint from construction as documented in earlier Sound Transit projects.
 - iv. Additional carbon and pollution generated from 5-8 years of traffic congestion is not specified in the DEIS but may be tallied in SDOT's (Seattle Dept. of Transportation) annual carbon assessment.
 - b. Since 2016, ST has altered proposed routes, plans, and station configurations without filing any DEIS amendments, or providing public notices as changes are made.

- c. Though the Sound Transit Board of Directors has not approved a West Seattle route, Sound Transit is delivering notices of potential buyouts and teardowns to property owners along a “placeholder” route.
- 4. **Few people who voted for ST3 in 2016 understood the significant negative impacts of WSLE.**
 - a. Until 2015, Sound Transit’s ST3 plans only included a light rail connection to Ballard.
 - b. Changing course in 2016, Sound Transit included a short light rail line to West Seattle in ST3. It promised that if voters approved ST3, bus and rapid transit service would be improved, and detailed light rail planning and public outreach would follow.
 - c. Few voters understood the negative impacts WSLE would have on their transit experiences, on the environment, and in losses of homes, businesses and jobs.
- 5. **Puget Sound Regional Council (PSRC) and Sound Transit data show that by 2050, light rail will only carry 3% of all regional trips, and buses only about 5% -- despite PSRC expecting 1.8 million more residents living in the Snohomish-King-Pierce region.**
 - a. PSRC expects buses and trains together will carry just 15% of trips in Seattle.
 - b. A government rationale for supporting WSLE is that transferring passengers onto the four-mile rail line will free buses it can redeploy for more frequent local service.
 - i. Data and experience, including “transfer penalty” and truncated bus routes, do not appear to support this rationale.
 - ii. Metro Transit stated to the West Seattle Transportation Coalition in 2014 that it will cancel a bus route costing more than \$7 per rider (about \$10 in 2024 dollars). The September 2024 WSLE cost estimate of \$6-\$7 billion to serve 27,000 riders, puts its per rider expenditure on 2032 opening day at \$222,000-\$260,000 per rider (see Economics 3.2.a. below).
 - 1. Using ST estimates of 4 million WSLE riders per year and adding \$40 million per year cost for operations and maintenance, reduces per rider cost to \$1500 for the first year, eventually plateauing at \$600 per rider in perpetuity.
 - 2. If rail does not replace bus, and per-trip cost from point A to point B is not reduced, moving riders from bus to rail is not beneficial. If only the rider's trip is measured, without including distance, the result may be misleading. For example:
 - a. Neither Metro Transit nor Sound Transit appear to have made cost-benefit calculations to assess the transit cost effectiveness of WSLE.
 - b. Metro’s plan for WSLE to replace four miles of bus corridor means it will deliver \$10 /rider passengers to one station of a \$1500 /rider rail line, then use another \$10 /rider bus to pick up the portion of those riders who don’t continue on rail.
 - c. Passengers who ride further on rail may also transfer to bus at the end of their rail segment.

- iii. Electrification of the Metro bus fleet, and expansion of flexibly routed bus service that would connect riders more efficiently to destinations within and beyond West Seattle, would yield a far better cost-benefit ratio. It could be funded with a fraction of the \$6-\$7 billion estimated for a single, four-station WSLE route.
 - iv. Improving bus service should also include City of Seattle exercising its municipal authority to eliminate road bottlenecks to give buses more priority in traffic.
- 6. **The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle corridor.**
 - a. ST's WSBLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service.
 - b. Presently, public and private roadway buses, vanpools and ride-share services can be programmed to carry more riders than light rail, often faster and less expensively. And their routes can be modified – unlike light rail -- as conditions change.
 - 1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers
 - 2. King County Metro:
 - a. is planning to transition its entire fleet of buses to electric power.
 - b. has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas.
- 7. **The light rail bridge – that has not yet been designed, would extend 1.5 miles from SODO to Pigeon Point at a minimum 100 feet height over the Spokane St. viaduct, SR99, and the Duwamish River. This presents risks of rising expenses and construction delays, including:**
 - a. No passenger railroad bridge of this length and consistent height has ever been built.
 - b. The bridge will run over the [Seattle Fault earthquake and liquefaction zone](#), creating engineering challenges and downstream risks.
 - i. Structural shifting caused by the 2001 Nisqually earthquake contributed to the 2022 failure of the West Seattle high bridge, and its 2-1/2 year closure for repairs. The proposed WSLE bridge follows the same pathway, but at twice the elevation.

Section 3: Economics

- 1. **At the present \$6-\$7 billion estimate for WSLE, Sound Transit will have spent \$1.1-\$1.3 million per rider to put each passenger on the train** (including construction, interest payment, operations, and maintenance costs).

- a. Opening day per rider WSLE cost is based on ST's May 12, 2023, email to the Federal Transportation Administration, estimating 5,400 boardings per day between 2032 and 2042 – as Metro Transit continues to run its C, H and 21X bus lines between West Seattle and downtown until the SODO-Downtown segment is complete in 2042.
 - i. After Year 1, expecting approximately 194,000 riders per year, per rider cost may drop to \$3107-\$3621 per rider, and by 2042, drop to \$381-\$330 per rider.
 - b. By 2042, it is estimated that Sound Transit will have spent an additional \$2 billion for the SODO-Downtown segment, including a second tunnel. Metro Transit will terminate Rapid Ride C, H and 21X bus service on the corridor. From that point, Sound Transit estimates WSLE ridership will increase to 27,000 boardings per day. Cost on opening day may thereby drop to \$296,000-\$334,000 per rider, calculating a \$8-\$9 billion total for the complete extension.
 - i. Depending on Sound Transit's amortization schedule for the \$8-\$9 billion total WSLE + Downtown segment construction expenditure, plus interest payments, plus \$40 million estimated annual WSLE operations & maintenance cost, overlaying annual ridership estimates of 4 million, per rider cost may plateau between \$600-\$1500 in perpetuity.
 - c. In advocating for WSLE rail to replace buses on the 4-mile SODO-WS corridor, Metro Transit is advocating to deliver \$10 per rider passengers to a \$600 to \$1.3 million per rider WSLE train station, for a four-mile ride, to a stop where they may transfer to another \$10 per rider Metro bus.
 - d. The non-profit Transportation Choices Coalition testified at Sound Transit's September 26, 2024, board meeting that price should be no object. Between Washington's powerful Congressional delegation able to funnel debt-relief capital to Sound Transit, and the perpetual \$1780 per year in Sound Transit taxes that every Pierce, King and Snohomish County household has been paying since 2017, TCC believes money will be perpetually available for light rail projects.
 - e. In 2022, Sound Transit reported a \$12 billion budget shortfall, then recast its accounting to appear \$6 billion in debt. At ST's September 19, 2024, board meeting, ST CEO Goran Sparrman and Deputy CEO of Megaproject Delivery Terri Mestas asserted that the \$6-\$7 billion cost for WSLE can be managed.
 - f. It would appear that, if cost is no object, Sound Transit could spend any amount needed for WSLE, and tunnel from SODO to the east bank of the Duwamish, use an immersed tube or other tunnel to cross beneath the Duwamish, then tunnel from the west bank to the West Seattle Junction, reducing most impacts listed here.
 - i. This project would require Sound Transit to generate a separate EIS.
2. **At \$6-\$7 billion (\$1.5 billion-\$1.75 billion per mile) for 4 miles (Seattle Transit Blog), WSLE is the world's second-most expensive urban rail project**, behind NYC's subway upgrade (\$2.8 billion /mile), but ahead of San Francisco's subway (\$920 million /mile)
- a. The cost covers only the light rail segment between SODO and West Seattle
 - b. Additional cost will be incurred for building the SODO to downtown Seattle tunnel link.

- 3. WSLE may present revenue losses and opportunity costs for transit across the region (Snohomish, King, and Pierce counties), and for the key light rail city of Seattle.**
- a. While city and county revenues have decreased, Sound Transit will eliminate businesses, services and properties that pay into municipal tax rolls.
 - i. Neither ST, Seattle nor King County has run cost-benefit analyses to judge whether trading a decade's worth of WSLE-caused tax revenue losses for anticipated future revenue will pencil out – given that:
 - 1. Neither ST nor the City of Seattle has calculated what net economic benefits WSLE will create for West Seattle, the CID and SODO, and
 - 2. While light rail creates benefits in some areas, West Seattle commerce and real estate markets up to now have not significantly suffered, even during the pandemic.
 - b. **At least 70 West Seattle businesses and services will be forced to move or close, but the final number can't be determined until ST chooses a WSLE alignment.**
 - i. In West Seattle, 500-1000 jobs connected to displaced businesses and services will be lost. In SODO and Chinatown-International District areas, additional businesses will be displaced or close, and more jobs lost.
 - ii. The number of businesses displaced will depend on the WSLE alignment ST finally chooses. [West Seattle blogger Marie McKinsey](#) offered this list of possible business displacements, extending from Jefferson Square (37 closures) to Delridge (West Seattle Athletic Club, Uptown Espresso, Skylark Cafe), to West Marginal Way.
 - iii. Patronage estimates by affected businesses (e.g., 7-11, Taco Time, Starbucks) average 1000 customers per day, with more for larger enterprises (e.g., Trader Joe's, Safeway).
 - iv. Businesses forcibly relocated have low survival rates, particularly in minority and low-to-middle income neighborhoods: 1974 Urban Renewal study: (<https://www.kcdc.org/wp-content/uploads/2022/10/A-Case-Study-of-the-Consequences-of-Displacement-Caused-by-Urban.pdf>). "The non-survival rate was highest among the small eating and drinking, food stores, and miscellaneous retail and services."
 - v. Demographic trends show movement of upscale, primarily White workers moving back to urban centers of employment and commerce, and non-White workers and businesses moving or (immigrants) taking up residence in suburban areas (see Appendix 5. 'Great Inversion')
 - 1. As these trends continue, it is even less likely minority businesses will be able to successfully relocate, and even less likely the employees of these businesses will find places they can afford to live.
 - 2. While light rail helps move people to areas of the city where they can recreate and consume, it does not support people who are providing the businesses and jobs for the more metropolitan population.
 - c. Rather than create an estimated \$6-\$7 billion in lost WSLE opportunity costs for Seattle and the region, the money could be better invested in other transit options within the

WSBLE corridor and beyond, yielding a lower carbon footprint, and fewer environmental, social and economic impacts.

4. **Freight, public transit, emergency services and commuters will be disrupted, and productivity impacted as West Seattle's main roads north and south of the WS high bridge are blocked during construction.**

Section 4: Local Environment and Global Climate

1. As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:

- **attracting new riders, and**
- **expanding walkable, car-free urbanism near three new West Seattle light rail stations.**
 - a. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e) forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6-3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total...").
 1. The restatement is used to extend the mitigation period by at least 50 years – to 2080, or later.
 2. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them.
 3. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period
 4. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit.
 5. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy
 - i. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032.
 - ii. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080.**
 - iii. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941 tons.
 1. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941 tons per year reduced, yields a payback period of 48 years – until the year 2080, to mitigate WSLE construction carbon.
 - b. **The Build option will only reduce car and light truck miles traveled by 0.02%** compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total – Table 4.6-1, "Regional Vehicle Miles Traveled and Average Daily Traffic Change"). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.

- c. **Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes.** This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.
- d. **The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.")**
 - TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...")
 - The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2.941 tons generated by the methodology Sound Transit uses in the WSLE FEIS.
 - This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly.
 - While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated.
- e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.
- f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's and King County's goals are to achieve carbon neutrality by 2050.
 - However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use.
 - As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day.
 - Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not.
- g. **The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated.** Sound Transit has already cut about 16,000 trees (apx. 140

acres) for its north-south line, according to a count from [TreePAC.org](https://www.treepac.org/). Those trees would have absorbed an estimated 64,000 tons of carbon a year ([City of Seattle & One tree Planted](#)) – nearly half the carbon output from WSBLE construction.

The City of Seattle can ill afford to lose tree canopy. Seattle has lost 255 acres of trees since 2017 (acreage cut by Sound Transit within city limits may be included in the Seattle count). Globally [in 2023, forests and other land ecosystems emitted almost as much carbon dioxide as they absorbed](#), due to fires, deforestation, and other factors.

- a. Eliminating acres of forest will exacerbate Seattle’s heat islands, which are worst around light rail stations, areas where the city’s commerce and employment are concentrated, and within its low income and of-color communities, which Lower economic areas are more prone to heat adverse conditions, fewer parks and tree cover. They are less economically able to afford air conditioning or other means to keep cool.
 - Heat sink areas, King County Executive (& ST Chair) Dow Constantine’s "Three Million Trees Initiative", City of Seattle's Trees for Neighborhoods program, KC Land Conservation Initiative: <https://kingcounty.gov/en/legacy/elected/executive/constantine/news/release/2021/june/23-heat-mapping-results> (June 23, 2021)
- b. The WSLE will eliminate three acres of north Pigeon Point Forest, plus 1-3 more acres of West Seattle green space, and beaver, salmon, heron and other species habitats there and on the Duwamish River and Longfellow Creek.
 - Sound Transit has not calculated costs for man-made elements to replace erosion control, storm water management, oxygen production, carbon sink, shade, and other ecosystem services provided by green infrastructure.
- c. As Sound Transit runs its modest program to replace trees it has eliminated, and Seattle’s recent \$13 million in federal grants will fund planting trees in Delridge and the Chinatown International District , the two entities will simply be working back from the deficit ST will cause with WSLE.
- d. Replacing mature trees with saplings is what Nature does after a natural disaster. ST is imitating a natural disaster.

2. Under Washington’s Climate Commitment Act (CCA), Sound Transit’s claimed level of carbon emissions in the FEIS – 141,000 metric tons over five to six years of construction – qualify it as a “large quantity carbon emissions generator” (LQG). The LQG threshold is 25,000 metric tons of carbon per year.

- a. The best way to avoid emission is not to generate them (see **Minnesota** below).
- b. The WSBLE DEIS does not address purchases of carbon offsets, or other high-quantity mitigation plans for this massive output.
- c. The Puget Sound Clean Air Agency’s (PSCAA) analysis finds “. the Chinatown International District and Duwamish Valley neighborhoods facing disproportionate air pollution impacts, impacts from WSBLE construction, and more sensitive health outcomes in the form of higher air quality-related hospitalizations.”
- d. PSCAA AQ Director Kathy Strange commented in 2022 on Sound Transit’s WSBLE DEIS, that “...transportation emissions will be improved in the long-term because of light rail...” The data prove otherwise.

- e. Currently, [Minnesota is the only U.S. state holding its agencies accountable to its climate goals](#). A provision in its 2024 transportation law requires both state and municipal transportation planning agencies to take the state's climate goals into account when assessing new projects.

3. Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE.

Section 5: Equity

1. Sound Transit's WSLE proposal does not prioritize equity.

- a. The WSLE will serve the more affluent parts of West Seattle, while travel from less affluent, more diverse areas with more mobility disadvantaged citizens will require more transfers and take longer
- b. A "transfer penalty" will affect riders arriving at stations by bus at ground level. They must either ride or climb multiple levels up or down to reach a train. At the Junction station, walk time may add five minutes to the transfer, and the wait time for the next train may add another 10.
- c. Light rail will not improve access for residents who live in West Seattle's transit deserts (those lacking convenient access to transit within ¼ mile walk).
 - i. Metro buses re-deployed after the 2042 opening of WS-CID service will not deliver residents remaining in West Seattle to new locations of businesses and services WSLE will have displaced.
 - ii. WSLE will instead encourage more use of private vehicles to reach these locations.
- d. Elimination of the Frye Business Center and commercial properties to the north and south for construction of the Delridge and Avalon light rail stations will:
 - i. exacerbate the "food desert" of grocery and prepared food providers between North Delridge and California Ave SW, for the area's mixed demographic communities
 - ii. eliminate the walkable/15-minute Delridge-Avalon neighborhood, and deprive these communities of gathering places, and medical, social, business and recreational services

2. To make way for light rail, WSLE will eliminate over one hundred houses and apartments.

- a. The full number of residential buildings to be razed cannot be estimated, as Sound Transit has not chosen a final route. It will bulldoze everything from single houses in Delridge to 92 apartments in Jefferson Square. The Executive Summary of the WSLE FEIS indicates that the Preferred Alternative will require displacing 165 to 173 residential properties, and 132 to 133 businesses employing 1,230 people.
- b. Despite large numbers of new housing units and apartments built in West Seattle since 2014, rent and purchase costs have increased, not decreased. That has pushed out less wealthy residents (see *Seattle Times* May 12, 2024) and increased their needs to travel longer distances for work, shopping and entertainment, most often by car. Many have moved to other cities.

- c. Transit-oriented development (TOD -- dense housing, such as apartments, multiplexes, and ADUs) has been built along the Delridge, Avalon and East Junction bus routes of Rapid Ride H and C, and 21 and 128. Sound Transit will bulldoze a significant portion for the rail line, and not replace it for up to 10 years, further depriving West Seattle of affordable housing, while wasting public resources.

3. The Sound Transit Board has the authority to choose the No Build option for WSLE.

- a. Under Section 2 of the ST3 package that voters approved in 2016, the board must reconsider projects that are infeasible, unaffordable and/or unbuildable. WSLE is all three.
- b. Contrary to what regional and city leaders are saying, the WSBLE and WSLE light rail proposals can be re-considered, and better transit options can be chosen – under the No Build option
- c. No Build is a legitimate, legal, and responsible choice, which is included, under federal and state law, in all environmental reviews of large, disruptive transit construction projects. Based on the findings of the environmental process through this date, project sponsors should adopt the No Build option.
- d. The No Build option for WSLE will only affect the West Seattle corridor:
 - i. other ST3 projects could continue to be studied and implemented, as they are subject to a separate environmental process, and
 - ii. Sound Transit will still be able to get [Federal Capital Investment Grants](#) for non-light rail transit, and for expansion of high-capacity fixed-route bus transit.

Concluding Summary:

1. The Downtown-West Seattle (WSLE) light rail line should not be built (No Build option). Within the No Build option, the Ballard-Downtown segment should also be reconsidered.
2. Sound Transit's WSLE presents more disadvantages than advantages, including overwhelmingly negative social, economic and environmental impacts. As such, it fails to satisfy basic criteria set forth by ST3 and its FEIS for improving corridor transit. The costs, and negative environmental, economic and residential impacts of WSLE outweigh the benefits of building it
3. Current transit modes carry more passengers now, without transfers and wait times, than light rail promises to carry when completed. WSLE will degrade rather than improve the ridership experience.
4. The 146,000 tons of carbon that WSLE construction will generate – reduced from 614,000 tons in the Draft EIS -- plus elimination of and damage to acres of forest and habitat, will be more than the benefits of a short light rail line can mitigate through year 2105.
5. Choosing the light rail investment over more flexible, effective and cheaper transit modes presents opportunity costs for the City of Seattle, and the regional transit network.
6. Sound Transit can achieve better ridership by continuing to expand and electrify King County Metro and ST Regional Express bus services, on the West Seattle peninsula, W. Seattle-Downtown corridor, and beyond.

Any Sound Transit taxing district resident opposed to the construction of the West Seattle light rail extension has three paths of action:

1. Use emailtheboard@soundtransit.org to contact all board members. As 17 of its 18 members are elected officials, and accountable to voters, [each can be contacted directly](#) by their own constituents.
 - The Seattle members include City Council Member [Daniel Strauss](#), Mayor [Bruce Harrell](#), Council Member [Rob Saka](#) **, ST Board Chair [Dow Constantine](#) **, and King County Council Member [Girmay Zahilay](#). (** indicates lives in West Seattle). City Council Member Rob Saka chairs the City Council's Transportation Committee. [King County Council Member Teresa Mosqueda](#) also lives in West Seattle.
 - Include specific information from this document in messages to officials
 - Contact board and council members by letter, phone and email, and urge (or demand) that they:
 - Stand up for businesses, jobs, housing, communities, and the environment in Seattle.
 - Call for adopting the **No Build Option** still listed in the FEIS for WSLE and visible for years in the DEIS for WSBL.
 - Require Sound Transit to consider cheaper, less destructive, lower carbon transit options for the Downtown-West Seattle corridor than rail.
 - Support using other modes, including buses, bus rapid transit, and other transit service connections to the regional rail network
2. Contact Port of Seattle Commissioners [Fred Felleman](#), Commissioner-Secretary [Ryan Calkins](#), Commissioner-Vice President [Toshiko Hasegawa](#), Commissioner-President [Hamdi Mohamed](#), Regional Transportation Manager [Geraldine Poor](#), Chief of Staff [Aaron Pritchard](#), and management staff [LeeAnne Schirato](#), [Kathy Roeder](#) and [Sabrina Bolieu](#).
 - Ask them to object vigorously and officially to impacts the WSLE bridge will cause, and that the Port of Seattle has opposed, including obstruction of the East and West Duwamish waterways, impairment of maritime traffic and businesses, damage to the Duwamish River and Longfellow Creek ecosystems, and a huge carbon footprint.
3. Email local business organizations that will be affected:
 - * [West Seattle Chamber of Commerce](#)
 - * [West Seattle Junction Association](#)

Appendix

Additional Considerations from Research Literature

1. Consumer willingness to fund light rail development decreases as cost increases

[Economists at the Federal Reserve Bank of St Louis](#) showed that when consumers understand the actual costs of getting light-rail services, the amount is generally more than they are willing to pay.

Nationwide, annual light-rail operating costs (\$778.3 million) far exceed fare revenue (\$226.1 million). The balance (\$552.2 million) is paid for with tax dollars. Examples (see also Snohomish-King-Pierce below): Fare revenues cover only 28.2% of system operating costs for St. Louis, 19.4% for Baltimore and 21.4% for Buffalo. If construction costs are added, losses become so large, no light-rail system can possibly recoup its costs.

Based solely on dollar cost, economists at the Federal Reserve Bank of St. Louis suggest that annual light-rail subsidies in St. Louis could instead be used more efficiently to buy a hybrid Toyota Prius every five years and pay annual maintenance costs of \$6,000 for 7700 low-income transit riders – with minimal pollution increases, and only a 0.5 percent increase in traffic congestion. Funds would still be left for all other MetroLink riders to pay for ride-share and bus fares.

Houston: When [Houston Metro proposed the Purple line in 2008](#), it estimated a \$591 million cost, and 28,750 weekday riders. By September 2020, costs reached \$822 million, with daily expected ridership decreased to 5,230, meaning a per rider cost of about \$150,000 to build the Purple Line.

Snohomish-King-Pierce Counties:

1. [Sound Transit revenues do not cover its operating expenses](#)
 - a. Sound Transit farebox revenues in 2023 covered only 16% of Link light rail operating costs (lower than the 40% minimum policy threshold), 9% of ST Express bus operating costs (below the 20% threshold), and 7% of Sounder costs (below the 23% threshold).
 - b. Revenue vs. cost gaps widen more when construction costs are added. Examples:
 - i. Adding together operations, maintenance and construction costs, light rail fare revenues cover less than 3%.
 - ii. For Sounder North commuter rail, ST over-estimated ridership by 90%, and underestimated total costs vs. farebox revenue by 95%.
 - c. As regional revenues will never cover or recoup its full costs, Sound Transit must add millions of dollars in federal grants and borrowed money to cover them.

2. Station development does not generally benefit low-income transit users

A [2019 University of Houston study](#) finds mixed effects on the welfare of neighborhoods after light rail construction. Researchers estimated an \$11,000 average increase in median income for neighborhoods near the new rail line development; but most gains go to high-income neighborhoods, while low-income neighborhoods see their income decline. The observed income polarization may be explained by poverty magnet and gentrification effects occurring simultaneously across the treated neighborhoods.

Light Rail Transit (LRT) does not appear to consistently deliver on its progressive policy goals of alleviating labor-skill mismatch, creating time cost savings, and increasing income mobility.

3. Light rail development does not reduce congestion

[Los Angeles: While light rail investments may increase transit accessibility and ridership within high-demand corridors, it does not reduce congestion.](#)

4. Per Capita Transit Ridership Is Declining

[Since 2013, U.S. transit ridership has declined, despite continued growth in population.](#)

Ridership has peaked and decreased seven different times since 1980, but overall, transit ridership per capita has decreased by nearly 15%. Researchers are evaluating economic considerations, fuel price, changing modal choices, and other areas as possible causes for the decline.

Demographic trends help to explain declining transit usage:

a. The U.S. [population is aging](#). While young age cohorts have a higher propensity for transit use, they represent a lower share of the population.

b. Simultaneously, significant population declines in some of the counties with high-quality transit service and use is being mirrored by population growth in counties with lower levels of transit service and use. Rapidly growing counties had half the rate of commuting to work by transit as did rapidly declining counties.

c. [Over 90% of U.S. population growth in 2023 occurred outside of its 124 largest cities.](#)

Among the 124 cities that the U.S. Census Bureau reports with populations over 200,000, about a third have lost population except 14 over 200,000 populations cities in Texas, and nine in Florida. Medium-sized cities in Florida, the Carolinas, and Las Vegas suburbs also added to the population. Americans are presently trading dense, urban, transit-oriented cities for less expensive, more spacious living elsewhere. How this will play out in transit development and politics are key questions.

5. Great Inversion

Suburbia increasingly sorted on bases of socio-economic status and race ([Nijman, 2020](#); [Nijman & Clery, 2015](#)). As suburbs continue growing:

- a. based on economic affordability ([Kolko, 2017](#)),
- b. central-cities appear to revive and renew growth, as city as “the office,” especially for growing numbers of self-employed and freelancers, in the new urban, knowledge transfer and networking economy, that thrives in a high density and high circulation environment ([Carlino, 2015](#); [Kloosterman, 2020](#); [Scott, 2017](#)).

Cities and city centers as preeminent sites of consumption, consumer services, and amenities: [Glaeser, Kolko, and Saiz \(2000\)](#). Also, rise of cities as sites of *consumption* ([Jayne, 2005](#))

Significance of actual vs. relative numbers of workers, types of workers, incomes, and vulnerabilities of ‘gig economy’ and ‘sharing/platform economy’: ([Graham, Hjorth, & Ledonvirta, 2017](#); [Davidson & Infranca, 2016](#); [Shambaugh, Nunn, & Bauer, 2018](#)).

6. Public transit is losing its customer base

During the pandemic, people formed new mobility habits, and most are not returning to regular use of urban buses and trains. In a 2022 survey of 38 transit agencies worldwide, researchers found a 10% loss in the transit customer base, as reported by the [International Association of Public Transit](#).

As of spring 2024, Sound Transit has not yet consistently reached its original 2010 light rail ridership target to the University District, even including the extension to Northgate, according to the U.S. Federal Transit Administration's National Transit Database (NTD). ST's original goal was an average of 2.7 million boardings per month. While it has touched that level in a few months since 2018, such as for Taylor Swift events in SODO, this ridership level has not been reached on average in 2024. Across all central Puget Sound transit agencies, NTD reports transit ridership as of April 2024 was 30% lower than in pre-pandemic 2019.

6. City of Seattle critique of ST3 DEIS (quote of excerpts):

- Sound Transit is considering cost savings refinements in response to its 2021 ST3 Realignment. Some of these proposed strategies are drastic.
 - We discourage scope reductions that do not bring commensurate benefit to the system and its riders, and that are not consistent with what was committed to voters.
 - We do not support strategies that would reduce access to the system.
- The City supports studying refinements that help control costs and provide meaningful benefits to local communities and the broader transit system and its riders, including:
 - Mix-and-match refinements for flexibility to choose segment alternatives that provide greatest benefit or fewest impacts;
 - Refinements to stations that would improve safe, non-motorized access;
 - Refinements that would avoid, minimize, or mitigate adverse project impacts.

7. Pandemic-caused vacancy rate increases in downtown areas

Between April 2019 and January 2023, [Seattle had the second-highest downtown commercial vacancy rate in the U.S. \(14.2%\)](#). ["Seattle's office vacancy rate reached 23.2% in July 2024, according to a recent report by Commercial Edge Research,](#) highlighting the city's struggle to adapt to post-pandemic market conditions,"

While Metro Transit ridership in 2024 has recovered to 75% of pre-COVID levels, full ridership recovery is questionable as work from home + hybrid structures continue, and central employment and commerce locations diversify from downtown Seattle.

8. Three factors drive excessive U.S. transit project costs

As Sound Transit cost overruns have been chronic, the [New York experience provides a cautionary tale](#) about how to structure transit projects, and how to avoid pitfalls.

Factors that add approximately 85% to costs include extra money going to red tape, wasted contingencies, paying workers during delays, defensive design, and profit. Specifically, the factors include:

- Lack of design standardization: this leads to fewer economies of scale, the inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process.
- Labor: 40-60% of the project's hard costs in the U.S. Labor costs in low-cost cases: Turkey, Italy, and Sweden are in the 19-30% range; Sweden, the highest-wage case among them, is 23%.
- U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>We ask the board to vote NO on moving WSLE to “design phase.”</p> <p>Every time you use “the voters have spoken” as your rationale for proceeding with WSLE, you know that your voters did NOT approve this in the 2016 ST3 package. They approved a WSBLE package that would improve transit, and study light rail. Sound Transit has not used ST3 money yet to improve transit in the three-county region. Sound Transit HAS generated a light rail study, that found WSLE will not improve transit ridership, reduce congestion, or contribute to social justice and economic development. It will irreparably damage the environment, exacerbate heat islands, create food deserts and not improve transit deserts between SODO and the West Seattle Junction.</p> <p>The board has been acting as if costs are irrelevant to this project. In fact, Motion 2024-59 directs ST’s CEO to shift WSLE baseline costs to make the project, which is \$5 billion over what voters approved in 2016, appear more affordable over a longer term than voters approved. We urge you to vote NO on this motion.</p> <p>You have all received our FEIS document, assembled by regional transit experts, and attached again here. Appendix 8 is a consulting document that found three factors driving excessive U.S. transit project costs. It provides warnings for ST, and guidance on how to avoid pitfalls that add approximately 85% to transportation costs:</p> <ul style="list-style-type: none"> • Lack of design standardization — leading to fewer economies of scale, inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process. • Labor costs: about 40-60% of US projects' hard costs, vs. labor costs in other countries studied (Turkey, Italy, and Sweden), that ranged from 19%-30% with Sweden as highest-wage case at 23%. • U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher; and extra money for red tape, wasted contingencies, paying workers during delays, defensive design, and profit. <p>Are WSLE economics irrelevant to this board? Are you believing what Transportation Choices Coalition has told you — that money grows on trees? The term “affordable schedule” should be meaningful in the WSLE EIS process: you should be understanding that taxpayer funds and patience are limited, especially as WSLE is now 3 times more expensive than voters approved in 2016, and per costs have climbed to \$1.3 million /rider.</p> <p>I urge you to stop using my 2016 approval vote on ST3, for \$1.75 billion, as your excuse for proceeding with WSLE alone for \$7 billion. For that cost, you could electrify the entire Metro</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency’s financial situation and to inform a financially sound project to be baselined.</p>

Appendix C. Comments Received on the Final EIS and Responses

	Transit fleet in King County, and improve transit across three counties. You remind me of an old joke about two women eating in a restaurant. One says, "This food is terrible," and the other says, "And such tiny portions!" For a terrible WSLE proposal, we get so little public transit.	
2	<p>The environmental process and analysis for this project is also flawed by Sound Transit never having conducted a Modal Alternatives Analysis or Major Investment Analysis.</p> <p>This analysis would have informed the decisions that Sound Transit's Board made in choosing high-capacity transportation (HCT) mode(s) for the Downtown-SODO-West Seattle corridor. Items the analysis would have likely revealed:</p> <ol style="list-style-type: none"> 1. light rail is less cost effective on a per rider basis than bus and bus rapid transit (BRT). With no evidence of Sound Transit conducting this analysis, it has failed the board, and called the board's choice of light rail into question (See Section 5, Item 4 for details). 2. Bus alternatives could be deployed to serve the corridor for less than \$1 billion, and would most likely attract more transit riders than the additional 2000 that Sound Transit's FEIS predicts will ride WSLE by 2042 (see Section 2, Ridership 2.d. below). 	<p>Consistent with the State Environmental Protection Act (SEPA), the West Seattle Link Extension Final EIS provides the public and decision makers with information about the West Seattle Link Extension "at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified" (Washington Administrative Code [WAC] 197-11-055(2)). This is also consistent with the National Environmental Policy Act (NEPA), which provides that "Agencies shall integrate the NEPA process with other planning at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts" (40 Code of Federal Regulations 1501.2).</p> <p>Refer to response to comment 1 regarding the decision to select light rail as the mode for the West Seattle Link Extension.</p>
3	<p>Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE. With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension does not satisfy the ST3 and DEIS criteria and should not be built. Expert evaluation of the environmental record shows that:</p> <ul style="list-style-type: none"> • WSLE transit times and therefore ridership will degrade West Seattle transit service, not improve it after the WSLE and Ballard LE open in 2032 and 2042 respectively • The construction-generated carbon will be more than passenger loads on WSLE trains and TOD land use effects can mitigate over five future decades of WSLE operation. • Acres of forest and habitat will be eliminated, and much more of it irreparably damaged • Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network: • Economic development in West Seattle will be set back for at least a decade • Equity, community-building and social justice will be set back at least a decade, • -- raising the question, based upon the newest, September 2024 WSLE cost estimate: "How can six to seven billion dollars be better spent to improve public transit?" 	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Appendix C. Comments Received on the Final EIS and Responses

4	<p>Lower carbon, less expensive and less destructive public transit options than WSLE have been studied by Sound Transit, are available and serving West Seattle riders better now than rail will in the future, including but not limited to:</p> <ul style="list-style-type: none"> a. Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane b. Add north and south Busway exits from east end of West Seattle Bridge c. Add to exclusive bus lanes in West Seattle <p>Complete Metro Transit initiative to electrify bus fleet</p>	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>
5	<p>1. The WSLE light rail plan will not improve transit or rider experience on the Downtown- West Seattle corridor. It will make them worse.</p> <ul style="list-style-type: none"> a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though it may take longer if traffic is heavy. b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see "transfer penalty" in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer. c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers. <p>2. Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.</p> <ul style="list-style-type: none"> a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment. b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences) <ul style="list-style-type: none"> i. The FEIS sorts ridership forecasts based on several options: <ul style="list-style-type: none"> a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built b) Two station scenario, without Avalon station c) Three station scenario with Delridge, Avalon and Junction stations ii. Appendix 2 of Sound Transit's Transportation Technical Report shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares. c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day. 	<p>Chapter 3, Transportation Environment and Consequences, of the Final EIS provides ridership forecasts and travel times.</p>

Appendix C. Comments Received on the Final EIS and Responses

	<p>d. The Final EIS on page 3-2 states, “The addition of the West Seattle Link Extension to the regional transit system would result in about 2,000 net new daily transit trips by 2042.”</p> <p>This number is:</p> <p>i. not mentioned in the FEIS Executive Summary and is not otherwise publicized by Sound Transit on its website or in any other documents,</p> <p>ii. contradicted by ST’s 5/12/23 email to FTA.</p> <p>e. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.</p> <p>i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix 6., “Per Capita Transit Ridership Is Declining”).</p>	
6	<p>The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase..</p> <p>a. ST’s WSBLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service.</p> <p>b. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle corridor</p>	<p>Refer to response to comment 3 regarding mode selection for the West Seattle Link Extension. A list of bus route service changes for each of the Build Alternatives is provided in Section 3.3.2, Build Alternatives, of Appendix N.1, Transportation Technical Report of this West Seattle Link Extension Final EIS. Bus service assumptions for both the No Build Alternative and Build Alternatives were developed by King County Metro Transit (Metro) and Sound Transit as part of Appendix B, Transit Service Integration Technical Memorandum, of Attachment N.1A, Transportation Technical Analysis Methodology, in Appendix N.1. Bus service would be restructured to integrate with the project, which would result in removing or truncating some lines but generally replacing them with reliable, high-frequency light rail service. The bus service hours savings from removing or truncating routes would be redeployed elsewhere in accordance with Metro’s service guidelines. The 2042 Build Alternatives assume there will be changes to bus service in the West Seattle Link Extension project corridor to integrate with the new light rail line. The service changes are based on Metro Connects and coordination with Metro regarding this project.</p>
7	<p>As climate change worsens, Sound Transit’s FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:</p> <ul style="list-style-type: none"> attracting new riders, and 	<p>Refer to Section 4.6, Air Quality, and Section 4.10, Energy Impacts, of the West Seattle Link Extension Final EIS for air quality and energy analyses. As described in Section 4.6.6.1.2, Construction Emissions, construction emissions were calculated using FTA’s Transit</p>

Appendix C. Comments Received on the Final EIS and Responses

	<ul style="list-style-type: none"> • expanding walkable, car-free urbanism near three new West Seattle light rail stations. a. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e) forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6- 3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total..."). <ol style="list-style-type: none"> 1. The restatement is used to extend the mitigation period by at least 50 years-to 2080, or later. 2. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them. 3. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period 4. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit. 5. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy <ol style="list-style-type: none"> i. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032. ii. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080. ** iii. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reductio of 2,941tons. 1. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941tons per year reduced, yields a payback period of 48 years - until the year 2080, to mitigate WSLE construction carbon. b. The Build option will only reduce car and light truck miles traveled by 0.02% compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total -Table 4.6-1, "Regional Vehicle Miles Traveled and Average Daily Traffic Change"). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic. c. Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes. This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science 	<p>Greenhouse Gas Estimator V3.0. . Printouts of the results from this estimator are available in Appendix L4.6E, Greenhouse Gas Analysis. Section 4.6.6.1.2 also discusses the emerging nature of this field of analysis and provides additional context for interpreting these results.</p> <p>Refer to Appendix L4.6E for more information on the greenhouse gas emissions modeling.</p> <p>For more information on Sound Transit's environmental policy and sustainability initiatives, please visit Sound Transit's website at https://www.soundtransit.org/get-to-know-us/environment-sustainability.</p>
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Appendix C. Comments Received on the Final EIS and Responses

	<p>organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.</p> <p>d. The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.")</p> <ul style="list-style-type: none"> • TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...") • The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2,941 tons generated by the methodology Sound Transit uses in the WSLE FEIS. • This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly. • While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated. <p>e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.</p> <p>f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's and King County's goals are to achieve carbon neutrality by 2050.</p> <ul style="list-style-type: none"> • However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use. • As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day. • Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no 	
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Appendix C. Comments Received on the Final EIS and Responses

	<p>change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not.</p> <p>The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated. Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from TreePAC.org. Those trees would have absorbed an estimated 64,000 tons of carbon a year (City of Seattle & One tree Planted)- nearly half the carbon output from WSBLE construction.</p>	
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From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- WSLE - Citizen Concerns before issuing Record of Decision
Date: Wednesday, November 27, 2024 9:27:49 AM

From: Martin Pagel <mjpagel@gmail.com>
Sent: Thursday, October 31, 2024 9:19 PM
To: DOT Exec Sec (OST) <DOTExecSec@dot.gov>; Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; emailtheboard@soundtransit.org
Subject: WSLE - Citizen Concerns before issuing Record of Decision

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Secretary, Leaders, and Board members,

I am a transit advocate. I am concerned that Sound Transit's plan for the West Seattle Link Extension (WSLE) has some material shortcomings which are misrepresented by the WSLE EIS published by Sound Transit earlier this year.

While the draft EIS covered both West Seattle and the downtown to Ballard line, the EIS only evaluates the West Seattle to SODO portion. While the EIS now claims all the advantages of the full line (at least between West Seattle and downtown), it assumes that the downtown connection will be built before 2042. But it fails to mention the construction impacts of a new line through downtown and fails to disclose what ridership would look like until such connection gets built.

Sound Transit has a history of underestimating cost and delaying projects, and even dropping high-ridership stations (such as First Hill). During the pandemic, ST already "realigned" the ST3 plans once, by delaying projects to align with their financial capabilities. Now, cost for WSLE has escalated further, and ST already disclosed that similar increases will apply to the Ballard project. It recently announced that it will bump up against its debt ceiling in the next few years. It is very likely that funding will delay or even cancel the Ballard/downtown efforts.

For the Sound Transit Board and the public to understand its impact, the WSLE EIS needs to explain its benefits and impacts as a rail stub, as nobody knows when and whether it may tie into the larger network. When the EIS claims a ridership of 27,000, it is misleading the public when it does not mention that this will require additional funds and impact, that the project is still under discussion, and its schedule and funding are uncertain.

I understand that Sound Transit only expects a ridership of 5400 until the downtown connection is built (see email to FTA from 5/12/23), and KCMetro does not plan to change any of their WS to downtown routes, as two or three transfers would be unacceptable to riders. It

also means that until a WS-downtown connection is built, the line will not meet the needs of the project as claimed in EIS ES.2.3 and summarized as: “The West Seattle Link Extension is expected to reduce dependency on single-occupancy vehicles, slow down growth in vehicle miles traveled, conserve energy, and reduce greenhouse gas emissions. The project is anticipated to reduce daily vehicle miles traveled by approximately 17,000 by 2042, helping to achieve Washington state’s greenhouse gas emissions goals.”

The EIS even admits that there will not be any VMT (vehicle miles traveled) reduction until the connection is built.

While the EIS Executive Summary touts those advantages, it fails to mention that the EIS in Appendix L4.6E1 concludes that Sound Transit does not expect those sustainability advantages to offset the construction related carbon emissions. Instead, the project may generate 362,750 tons of carbon during its 50-year life span. This omission is another misrepresentation to the public.

Again, the calculation assumes a ridership of 27,000 and the downtown connection. However, it only takes the construction of the WSLE into consideration, not the construction of the additional tunnel through downtown, which would add another few hundred thousand tons of carbon and therefore makes this project even less attractive.

The ridership and carbon impact and the conclusions in the Executive Summary should be corrected before a ROC is considered.

Best

Martin Pagel

Seattle resident, transit advocate and blogger

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I am concerned that Sound Transit's plan for the West Seattle Link Extension (WSLE) has some material shortcomings which are misrepresented by the WSLE EIS published by Sound Transit earlier this year.</p> <p>While the draft EIS covered both West Seattle and the downtown to Ballard line, the EIS only evaluates the West Seattle to SODO portion. While the EIS now claims all the advantages of the full line (at least between West Seattle and downtown), it assumes that the downtown connection will be built before 2042. But it fails to mention the construction impacts of a new line through downtown and fails to disclose what ridership would look like until such connection gets built.</p>	<p>Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) describes the decision to separate the environmental review for the Ballard Link Extension. Future conditions for the Final EIS analysis include projects in Sound Transit's Regional Transit Long-Range Plan (2014), including the Ballard Link Extension.</p>
2	<p>For the Sound Transit Board and the public to understand its impact, the WSLE EIS needs to explain its benefits and impacts as a rail stub, as nobody knows when and whether it may tie into the larger network. When the EIS claims a ridership of 27,000, it is misleading the public when it does not mention that this will require additional funds and impact, that the project is still under discussion, and its schedule and funding are uncertain.</p> <p>I understand that Sound Transit only expects a ridership of 5400 until the downtown connection is built (see email to FTA from 5/12/23), and KCMetro does not plan to change any of their WS to downtown routes, as two or three transfers would be unacceptable to riders. It also means that until a WS-downtown connection is built, the line will not meet the needs of the project as claimed in EIS ES.2.3 and summarized as: "The West Seattle Link Extension is expected to reduce dependency on single-occupancy vehicles, slow down growth in vehicle miles traveled, conserve energy, and reduce greenhouse gas emissions. The project is anticipated to reduce daily vehicle miles traveled by approximately 17,000 by 2042, helping to achieve Washington state's greenhouse gas emissions goals."</p> <p>The EIS even admits that there will not be any VMT (vehicle miles traveled) reduction until the connection is built.</p>	<p>Refer to response to Comment 1 regarding the inclusion of the Ballard Link Extension as a future project in the Final EIS analysis.</p>
3	<p>While the EIS Executive Summary touts those advantages, it fails to mention that the EIS in Appendix L4.6E1 concludes that Sound Transit does not expect those sustainability advantages to offset the construction related carbon emissions. Instead, the project may generate 362,750 tons of carbon during its 50-year life span. This omission is another misrepresentation to the public.</p> <p>Again, the calculation assumes a ridership of 27,000 and the downtown connection. However, it only takes the construction of the WSLE into consideration, not the construction of the additional tunnel through downtown, which would add another few hundred thousand tons of carbon and therefore makes this project even less attractive</p>	<p>Please see Section 4.6, Air Quality, and Section 4.10, Energy Impacts, of the West Seattle Link Extension Final EIS for updated air quality and energy analyses. As described in Section 4.6.6.1.2, Construction Emissions, construction emissions were calculated using Federal Transit Administration's (FTA's) Transit Greenhouse Gas Estimator V3.0. . Printouts of the results from this estimator are available in Appendix L4.6E, Greenhouse Gas Analysis. Section 4.6.6.1.2 also discusses the emerging nature of this field of analysis and provides additional context for interpreting these results.</p> <p>Refer to Appendix L4.6E for more information on the greenhouse gas emissions modeling.</p>

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From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- West Seattle Light Rail Record of Decision, scheduled for release November 29, 2024. Timely Citizen Input
Date: Wednesday, November 27, 2024 9:29:35 AM

From: jan roberts <jan.roberts77@gmail.com>
Sent: Sunday, November 3, 2024 11:37 AM
To: DOT Exec Sec (OST) <DOTExecSec@dot.gov>; Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; josephine.gamboa@soundtransit.org
Subject: West Seattle Light Rail Record of Decision, scheduled for release November 29, 2024. Timely Citizen Input

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please consider: Lower carbon, less expensive, and less destructive public transit options that are available such as bus lane expansions and electrification of the bus fleet, that are available and could serve West Seattle riders more effectively than WSLE.

Thank you,

Jan Roberts
6600 38th Ave SW
Seattle, WA 98126
206 920 0130

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	Please consider: Lower carbon, less expensive, and less destructive public transit options that are available such as bus lane expansions and electrification of the bus fleet, that are available and could serve West Seattle riders more effectively than WSLE.	The Sound Transit Board considers a number of factors in selecting the project to be built. Those factors include potential environmental impacts; equity; Tribe, agency, business, community organization, and public comments; cost; schedule; ridership; and potential long-term benefits.

From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- West Seattle Light Rail Record of Decision, scheduled for release November 29, 2024. Timely Citizen Input
Date: Wednesday, November 27, 2024 9:29:01 AM

From: jan roberts <jan.roberts77@gmail.com>
Sent: Sunday, November 3, 2024 11:42 AM
To: DOT Exec Sec (OST) <DOTExecSec@dot.gov>; Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; josephine.gamboa@soundtransit.org
Subject: West Seattle Light Rail Record of Decision, scheduled for release November 29, 2024. Timely Citizen Input

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please consider the legal impacts WSLE will have.

Environmental: Significant carbon emissions and destruction of natural habitats.

Economic: High costs, displacement of businesses, and job losses.

Social: Setbacks in equity and community-building, increased travel times, and reduced transit efficiency.

Thank you,

Jan Roberts
6600 38th Ave SW
Seattle, WA 98126
206 920 0130

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Please consider the legal impacts WSLE will have.</p> <p>Environmental: Significant carbon emissions and destruction of natural habitats.</p> <p>Economic: High costs, displacement of businesses, and job losses.</p> <p>Social: Setbacks in equity and community-building, increased travel times, and reduced transit efficiency.</p>	<p>The Sound Transit Board considers a number of factors in selecting the project to be built. Those factors include potential environmental impacts; equity; Tribe, agency, business, community organization, and public comments; cost; schedule; ridership; and potential long-term benefits.</p>

From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- West Seattle Light Rail Record of Decision, scheduled for release November 29, 2024. Timely Citizen Input
Date: Wednesday, November 27, 2024 9:28:35 AM

From: jan roberts <jan.roberts77@gmail.com>
Sent: Sunday, November 3, 2024 12:01 PM
To: DOT Exec Sec (OST) <DOTExecSec@dot.gov>; Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; josephine.gamboa@soundtransit.org
Subject: West Seattle Light Rail Record of Decision, scheduled for release November 29, 2024. Timely Citizen Input

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please consider the high costs and financial burden on citizens:

The estimated cost of \$6-\$7 billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects, with questionable financial sustainability. A report on new financing ideas is due in coming months. Sound Transit's annual budget is \$3 billion, with total spending of [\\$148 billion from 2017 to 2046](#). The agency has legal power to issue bond debt in perpetuity to build voter-approved lines, and is already likely to pay into the 2060s. But mathematically, there are limits to what can be spent, and still keep a top credit rating.

Thank you,

Jan Roberts
6600 38th Ave SW
Seattle, WA 98126
206 920 0130

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Please consider the high costs and financial burden on citizens:</p> <p>The estimated cost of \$6-\$7 billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects, with questionable financial sustainability. A report on new financing ideas is due in coming months. Sound Transit's annual budget is \$3 billion, with total spending of \$148 billion from 2017 to 2046. The agency has legal power to issue bond debt in perpetuity to build voter-approved lines, and is already likely to pay into the 2060s. But mathematically, there are limits to what can be spent, and still keep a top credit rating.</p>	<p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>

From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- West Seattle Light Rail Record of Decision, scheduled for release November 29, 2024. Timely Citizen Input
Date: Wednesday, November 27, 2024 9:28:12 AM

From: jan roberts <jan.roberts77@gmail.com>
Sent: Sunday, November 3, 2024 12:07 PM
To: DOT Exec Sec (OST) <DOTExecSec@dot.gov>; Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; josephine.gamboa@soundtransit.org
Subject: West Seattle Light Rail Record of Decision, scheduled for release November 29, 2024. Timely Citizen Input

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please consider the high impact of light rail construction on businesses and jobs.

Displacement of Businesses:

At least 70 businesses in West Seattle will be forced to move or close due to the construction. The final number of displaced businesses will depend on the chosen alignment of the WSLE.

Job Losses:

The displacement of businesses will result in the loss of 500-1000 jobs in West Seattle. Additional job losses are expected in the SODO and Chinatown-International District areas.

Thank you,

Jan Roberts
6600 38th Ave SW
Seattle, WA 98126
206 920 0130

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Please consider the high impact of light rail construction on businesses and jobs.</p> <p>Displacement of Businesses:</p> <p>At least 70 businesses in West Seattle will be forced to move or close due to the construction. The final number of displaced businesses will depend on the chosen alignment of the WSLE.</p> <p>Job Losses:</p> <p>The displacement of businesses will result in the loss of 500-1000 jobs in West Seattle. Additional job losses are expected in the SODO and Chinatown-International District areas</p>	<p>The Sound Transit Board considers a number of factors in selecting the project to be built. Those factors include potential environmental impacts; equity; Tribe, agency, business, community organization, and public comments; cost; schedule; ridership; and potential long-term benefits.</p> <p>Sound Transit has adjusted alternatives during conceptual design to avoid or minimize impacts, including property acquisitions, to the extent possible. Refinement of project design will continue throughout final design.</p>

From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comment- West Seattle Light Rail Record of Decision, scheduled for release November 29, 2024. Timely Citizen Input.
Date: Wednesday, November 27, 2024 9:30:31 AM

From: Kristi DuPuy <kristidupuy@comcast.net>
Sent: Wednesday, November 6, 2024 10:13 AM
To: DOT Exec Sec (OST) <DOTExecSec@dot.gov>; Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; josephine.gamboa@soundtransit.org
Subject: West Seattle Light Rail Record of Decision, scheduled for release November 29, 2024. Timely Citizen Input.

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I am very concerned about the impact moving forward with the Light Rail Project in West Seattle, WA.

1. **Negative Impact on Transit Times and Ridership:**

- WSLE will degrade transit service, increasing travel times and requiring multiple transfers, which will negatively impact rider experience and reduce ridership efficiency.

2. **High Carbon Emissions from Construction:**

- The construction of WSLE will generate significant carbon emissions (140,952 metric tons), which will take decades to mitigate, making it environmentally unsustainable.

3. **Destruction of Forest and Habitat:**

- WSLE will eliminate acres of forest and habitat, causing irreparable environmental damage and exacerbating urban heat islands, particularly affecting low-income and minority communities.

4. **Economic and Social Setbacks:**

- The project will set back economic development, equity, and community-building efforts in West Seattle and the Chinatown-International District for at least a decade.

5. **High Costs and Financial Burden:**

- The estimated cost of \$6-\$7 billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects, with questionable financial sustainability.

6. **Displacement of Businesses and Residents:**

- WSLE will displace over 100 houses and apartments and at least 70 businesses, leading to job losses and further economic disruption in affected communities.

7. **Lack of Voter Awareness and Misinformation:**

- Many voters were unaware of the significant negative impacts of WSLE when they approved ST3 in 2016, including environmental damage and increased costs.

8. **Inefficiency Compared to Current Transit Modes:**

- Current bus and rapid transit services are more efficient, carrying more passengers with lower carbon footprints and fewer environmental impacts than the proposed light rail.

9. **Legal and Responsible No Build Option:**

- The Sound Transit Board has the authority to choose the No Build option, which is a legitimate and responsible choice under federal and state law, and would avoid the negative impacts of WSLE.

10. **Better Alternatives Available:**

- Lower carbon, less expensive, and less destructive public transit options, such as bus lane expansions and electrification of the bus fleet, are available and could serve West Seattle riders more effectively than WSLE.

Impacts:

- **Environmental:** Significant carbon emissions and destruction of natural habitats.
- **Economic:** High costs, displacement of businesses, and job losses.
- **Social:** Setbacks in equity and community-building, increased travel times, and reduced transit efficiency.
- **Legal:** The No Build option is a viable and responsible alternative that should be considered.

What is the environmental impact of light rail construction on Longfellow Creek

The document indicates that the construction of the West Seattle Link Extension (WSLE) light rail will have significant environmental impacts on Longfellow Creek. Specifically, it mentions:

1. Destruction of Habitat:

- The WSLE will eliminate and damage acres of forest and green space, which includes habitats for various species such as beavers, salmon, and herons that rely on Longfellow Creek.

2. Carbon Emissions:

- The construction will generate substantial carbon emissions, contributing to climate change and potentially affecting the local ecosystem around Longfellow Creek.

3. Ecosystem Services:

- The loss of forest and green space will reduce the natural ecosystem services provided by these areas, such as erosion control, stormwater management, oxygen production, and carbon absorption.

4. Heat Islands:

- The elimination of green spaces will exacerbate urban heat islands, which can negatively impact the local climate and biodiversity around Longfellow Creek.

Overall, the construction of the WSLE is expected to have detrimental effects on the environmental health and biodiversity of Longfellow Creek and its surrounding areas.

What is the impact of light rail construction on affected business?

The construction of the West Seattle Link Extension (WSLE) light rail will have several significant impacts on affected businesses:

1. Displacement of Businesses:

- At least 70 businesses in West Seattle will be forced to move or close due to the construction. The final number of displaced businesses will depend on the chosen alignment of the WSLE.

2. Job Losses:

The displacement of businesses will result in the loss of 500-1000 jobs in West Seattle. Additional job losses are expected in the SODO and Chinatown-International District areas.

3. **Economic Disruption:**

- The forced relocation of businesses can lead to low survival rates, particularly in minority and low-to-middle-income neighborhoods. This can result in long-term economic disruption for the affected communities.

4. **Customer Loss:**

- Businesses that are displaced or forced to relocate may lose their customer base, which can be detrimental to their survival and profitability.

5. **Impact on Local Economy:**

- The elimination of businesses and services that contribute to municipal tax rolls can result in revenue losses for the city and county. This can have broader economic implications for the local economy.

6. **Community Impact:**

- The displacement of businesses can disrupt the social fabric of the community, as local businesses often serve as gathering places and provide essential services to residents.

Overall, the construction of the WSLE is expected to have significant negative impacts on affected businesses, leading to economic disruption, job losses, and potential long-term harm to the local economy and community.

Please help!
Kristi DuPuy

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I am very concerned about the impact moving forward with the Light Rail Project in West Seattle, WA.</p> <p>1. Negative Impact on Transit Times and Ridership:</p> <ul style="list-style-type: none"> WSLE will degrade transit service, increasing travel times and requiring multiple transfers, which will negatively impact rider experience and reduce ridership efficiency. <p>2. High Carbon Emissions from Construction:</p> <ul style="list-style-type: none"> The construction of WSLE will generate significant carbon emissions (140,952 metric tons), which will take decades to mitigate, making it environmentally unsustainable. <p>3. Destruction of Forest and Habitat:</p> <ul style="list-style-type: none"> WSLE will eliminate acres of forest and habitat, causing irreparable environmental damage and exacerbating urban heat islands, particularly affecting low-income and minority communities. <p>4. Economic and Social Setbacks:</p> <ul style="list-style-type: none"> The project will set back economic development, equity, and community- building efforts in West Seattle and the Chinatown-International District for at least a decade. <p>5. High Costs and Financial Burden:</p> <ul style="list-style-type: none"> The estimated cost of \$6-\$7 billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects, with questionable financial sustainability. <p>6. Displacement of Businesses and Residents:</p> <ul style="list-style-type: none"> WSLE will displace over 100 houses and apartments and at least 70 businesses, leading to job losses and further economic disruption in affected communities. <p>7. Lack of Voter Awareness and Misinformation:</p> <ul style="list-style-type: none"> Many voters were unaware of the significant negative impacts of WSLE when they approved ST3 in 2016, including environmental damage and increased costs. <p>8. Inefficiency Compared to Current Transit Modes:</p> <ul style="list-style-type: none"> Current bus and rapid transit services are more efficient, carrying more passengers with lower carbon footprints and fewer environmental impacts than the proposed light rail. <p>9. Legal and Responsible No Build Option:</p> <ul style="list-style-type: none"> The Sound Transit Board has the authority to choose the No Build option, which is a legitimate and responsible choice under federal and state law, and would avoid the negative impacts of WSLE. <p>10. Better Alternatives Available:</p> <ul style="list-style-type: none"> Lower carbon, less expensive, and less destructive public transit options, such as bus lane expansions and 	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>electrification of the bus fleet, are available and could serve West Seattle riders more effectively than WSLE.</p> <p>Impacts:</p> <ul style="list-style-type: none"> • Environmental: Significant carbon emissions and destruction of natural habitats. • Economic: High costs, displacement of businesses, and job losses. • Social: Setbacks in equity and community-building, increased travel times, and reduced transit efficiency. • Legal: The No Build option is a viable and responsible alternative that should be considered. <p>What is the environmental impact of light rail construction on Longfellow Creek</p> <p>The document indicates that the construction of the West Seattle Link Extension (WSLE) light rail will have significant environmental impacts on Longfellow Creek. Specifically, it mentions:</p> <ol style="list-style-type: none"> 1. Destruction of Habitat: <ul style="list-style-type: none"> • The WSLE will eliminate and damage acres of forest and green space, which includes habitats for various species such as beavers, salmon, and herons that rely on Longfellow Creek. 2. Carbon Emissions: <ul style="list-style-type: none"> • The construction will generate substantial carbon emissions, contributing to climate change and potentially affecting the local ecosystem around Longfellow Creek. 3. Ecosystem Services: <ul style="list-style-type: none"> • The loss of forest and green space will reduce the natural ecosystem services provided by these areas, such as erosion control, stormwater management, oxygen production, and carbon absorption. 4. Heat Islands: <ul style="list-style-type: none"> • The elimination of green spaces will exacerbate urban heat islands, which can negatively impact the local climate and biodiversity around Longfellow Creek. <p>Overall, the construction of the WSLE is expected to have detrimental effects on the environmental health and biodiversity of Longfellow Creek and its surrounding areas.</p> <p>What is the impact of light rail construction on affected business?</p> <p>The construction of the West Seattle Link Extension (WSLE) light rail will have several significant impacts on affected businesses:</p> <ol style="list-style-type: none"> 1. Displacement of Businesses: <ul style="list-style-type: none"> • At least 70 businesses in West Seattle will be forced to move or close due to the construction. The final number of displaced businesses will depend on the chosen alignment of the WSLE. 	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>2. Job Losses:</p> <p>The displacement of businesses will result in the loss of 500-1000 jobs in West Seattle. Additional job losses are expected in the SODO and Chinatown-International District areas.</p> <p>3. Economic Disruption:</p> <ul style="list-style-type: none"> The forced relocation of businesses can lead to low survival rates, particularly in minority and low-to-middle-income neighborhoods. This can result in long-term economic disruption for the affected communities. <p>4. Customer Loss:</p> <ul style="list-style-type: none"> Businesses that are displaced or forced to relocate may lose their customer base, which can be detrimental to their survival and profitability. <p>5. Impact on Local Economy:</p> <ul style="list-style-type: none"> The elimination of businesses and services that contribute to municipal tax rolls can result in revenue losses for the city and county. This can have broader economic implications for the local economy. <p>6. Community Impact:</p> <ul style="list-style-type: none"> The displacement of businesses can disrupt the social fabric of the community, as local businesses often serve as gathering places and provide essential services to residents. <p>Overall, the construction of the WSLE is expected to have significant negative impacts on affected businesses, leading to economic disruption, job losses, and potential long-term harm to the local economy and community.</p>	

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From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- Sound Transit's West Seattle Link Extension Light Rail Record of Decision
Date: Wednesday, November 27, 2024 9:34:56 AM
Attachments: [Final RethinkTheLink, Environmental Conclusion, Oct 28, 2024, Version 4.9.pdf](#)

From: Marilyn Kennell <mkennell@gmail.com>

Sent: Thursday, November 7, 2024 1:53 PM

To: DOT Exec Sec (OST) <DOTExecSec@dot.gov>; Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; josephine.gamboa@soundtransit.org; doiexecsec@ios.doi.gov; Sixkiller.Casey@epa.gov

Cc: Niles globaltelematics.com <Niles@globaltelematics.com>; MartinWesterman <artartart@seanet.com>

Subject: Sound Transit's West Seattle Link Extension Light Rail Record of Decision

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Greetings,

I am a West Seattle resident who is very concerned about Sound Transit's West Seattle Link Extension light rail project. There are many reasons not to grant a Record of Decision for this project on November 29, 2024. The proposed light rail track will bulldoze homes and businesses, cut down acres of trees, and create "heat islands" and "food deserts" in our poorer neighborhoods. And it will NOT reduce greenhouse gas emission, improve transportation efficiency, or improve the mobility of West Seattle residents. We have tried to "talk" with Sound Transit about these issues at their board and systems expansion committee meetings (written and in person), but here is never a discussion - follow-up questions are not permitted. Public comment is met with blank stares, *if* the members look up from their cell-phones. An ironic calculus is used to determine how much time we are allotted - the more citizens sign up, the less time we get. Thirty seconds to make an existential plea to save our human, community, and natural environment is cruel and inhumane. I am on written and video record begging for a

community town hall. Even though West Seattle is less than 4 miles away from Sound Transit headquarters (a one-stop bus ride), the only interaction we have is at “station planning” events, where we get to choose between table-and-chairs or benches at the proposed stations. This is demeaning, and the sticky-notes for our comments are ludicrous.

The original \$1.7 billion ST3 budget for WSLE is now \$6-\$7 billion. Listed Rapid Ride corridor improvements have not been made, and Sound Transit’s 2030 delivery date will not be met. Voters are getting a different rail plan than Sound Transit presented as ST3 in 2016. The ST3 proposal did not describe Pigeon Point deforestation, “irreparable” habitat damage, or any notice of a large carbon footprint from construction as documented in earlier Sound Transit projects. Since 2016, ST has altered proposed routes, plans, and station configurations without filing any DEIS amendments, or providing public notices as changes are made.

On September 20, 2024, Sound Transit released a 900-page Final EIS. We have until November 29, 2024, to comment. To help our community comment on this overwhelming amount of material, members from two community coalitions have written an alternative Final Environmental Impact Statement. We presented our EIS-C to Sound Transit Chair Dow Constantine at the September 26, 2024 board meeting. All board members received prints copies via priority mail. Our eighteen-page document responds the ST WSLE FEIS’s statements that are outdated, vague, incomplete, and inaccurate. Our current revision is below:

We are asking you to not grant a Record of Decision for Sound Transit West Seattle Link Extension light rail. We should like

our alternative EIS-C made part of the public record.

With gratitude,

Marilyn Kennell
4022 32nd Avenue SW
Seattle, WA 98126
mkennell@gmail.com
(425)280-3538

West Seattle Light Rail Environmental Impact Statement-Conclusion (EIS-C)

An independent assessment of the environmental impact
of the Sound Transit West Seattle-Link Extension (WSLE) light rail proposal

Submitted by Rethink The Link (RTTL) and Regional Transit Colleagues

Revision 5.0 October 30, 2024

Comments or Questions? Contact RTTL at email contact@rethinkthelink.org

Section 1: Executive Summary

The Ballard-West Seattle light rail discussion started from the premise that roadway-based modes could not handle peak period passenger demand in that corridor. Thus, in 2016, Sound Transit presented a Ballard-West Seattle link extension (WSBLE) light rail proposal in its ST3 transportation package. It offered simple criteria for voters to consider:

- improve public transit,
- encourage economic development, equity, community-building and social justice,
- protect the environment.

Sound Transit's January 2022 WSBLE Draft Environmental Impact Statement (DEIS) was designed to show that:

- these simple criteria would be satisfied, and
- WSBLE's proposed advantages would outweigh its disadvantages.

The DEIS combined both West Seattle and Ballard light rail segments into one project routed through downtown Seattle. But changes to the Ballard portion required additional work. So Sound Transit and the USDOT Federal Transit Administration decided to separate them into two projects, move forward with a separate environmental review for the West Seattle (WSLE) portion, and delay review for the Ballard portion.

Since then, independent transit experts have researched and analyzed information from the West Seattle sections of the WSBLE DEIS, public comments submitted about the DEIS, the Final EIS released September 20th, and additional public transit research findings. **Since the 2016 ST3 vote, Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE.** With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension (WSLE) does not satisfy the ST3 and DEIS criteria, and should not be built. The experts found that:

- WSLE transit times and therefore ridership will degrade, not improve West Seattle transit service after the WSLE and Ballard LE open in 2032 and 2042 respectively
- The construction generation of carbon will be more than carbon-reducing impacts of WSLE trains can mitigate over five future decades of WSLE operation.
- Acres of forest and habitat will be eliminated, and much more of it irreparably damaged
- Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network:

- Economic development in West Seattle and Chinatown-International District will be set back for at least a decade
- Equity, community-building and social justice will be set back at least a decade,
- And raising the question, based upon the newest, September 2024 WSLE cost estimate: “How can six to seven billion dollars be better spent to improve public transit?”

The Sound Transit Board can and should choose the No Build option for the WSLE.

- [Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016](#), allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.
- ST Executive Corridor Director Cahill Ridge’s told the November 2017 West Seattle Transportation Coalition public meeting that ST “has no Plan B” for WSLE if financial, disruptive technology or other factors arise. He was incorrect. ST has several Plan B options available.
- Lower carbon, less expensive and less destructive public transit options than WSLE have been studied by Sound Transit, are available and serving West Seattle riders better now than rail will in the future, including but not limited to:
 - a. Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane
 - b. Add north and south Busway exits from east end of West Seattle Bridge
 - c. Add to exclusive bus lanes in West Seattle
 - d. Complete Metro Transit initiative to electrify bus fleet
- No Build is a legitimate, legal, and responsible choice, included under federal and state law in all environmental reviews of large, disruptive transit construction projects. ST3 project sponsors can and should consider this option and should note that the facts overall point to selection of No Build.

This document addresses the West Seattle link extension specifically, and the WSBLE generally. It contributes summary information to the decision-making processes for:

- a. local and state government officials who regulate and influence Sound Transit decision making, and
- b. citizens who pay significant taxes (see “revenues vs. costs” below) to fund Sound Transit, in the expectation that their government will provide improved mobility services.
- c. Government decision makers who have to decide what the WSLE Record of Decision (ROD) will finally state as the result of the environmental process for WSLE.

Section 2: Current Transit Ridership and Forecasts for West Seattle-Downtown Corridor, and Region

1. **The WSLE light rail plan will not improve transit or rider experience on the Downtown-West Seattle corridor. It will make them worse.**
 - a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though heavy traffic may cause it to take longer.
 - b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see “transfer penalty” in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer.

- c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers.
2. **Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.**
- a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.
 - b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)
 - i. The FEIS sorts ridership forecasts based on several options:
 - (a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built
 - (b) Two station scenario, without Avalon station
 - (c) Three station scenario with Delridge, Avalon and Junction stations
 - ii. Appendix 2 of [Sound Transit's Transportation Technical Report](#) shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.
 - c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day.
 - d. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.
 - i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix, **Per Capita Transit Ridership Is Declining**).
3. **[Sound Transit is not building what voters approved](#) as ST3 in 2016:**
- a. Voters are getting a different rail plan than Sound Transit presented as ST3 in 2016:
 - i. The original Ballard-West Seattle line (WSBLE) is now two separate lines – BLE and WSLE
 - ii. **The \$1.7 billion ST3 budget for WSLE is now \$6-\$7 billion.** Listed Rapid Ride corridor improvements have not been made, and its 2030 delivery date will not be met.
 - iii. The ST3 proposal did not describe Pigeon Point deforestation, "irreparable" habitat damage, or any notice of a large carbon footprint from construction as documented in earlier Sound Transit projects.
 - iv. Additional carbon and pollution generated from 5-8 years of traffic congestion is not specified in the DEIS but may be tallied in SDOT's (Seattle Dept. of Transportation) annual carbon assessment.
 - b. Since 2016, ST has altered proposed routes, plans, and station configurations without filing any DEIS amendments, or providing public notices as changes are made.

- c. Though the Sound Transit Board of Directors has not approved a West Seattle route, Sound Transit is delivering notices of potential buyouts and teardowns to property owners along a “placeholder” route.
- 4. **Few people who voted for ST3 in 2016 understood the significant negative impacts of WSLE.**
 - a. Until 2015, Sound Transit’s ST3 plans only included a light rail connection to Ballard.
 - b. Changing course in 2016, Sound Transit included a short light rail line to West Seattle in ST3. It promised that if voters approved ST3, bus and rapid transit service would be improved, and detailed light rail planning and public outreach would follow.
 - c. Few voters understood the negative impacts WSLE would have on their transit experiences, on the environment, and in losses of homes, businesses and jobs.
- 5. **Puget Sound Regional Council (PSRC) and Sound Transit data show that by 2050, light rail will only carry 3% of all regional trips, and buses only about 5% -- despite PSRC expecting 1.8 million more residents living in the Kitsap-Snohomish-King-Pierce region.**
 - a. PSRC expects that:
 - i. buses and trains together will carry just 15% of trips in Seattle.
 - ii. shared and single occupancy vehicles will carry most trips in the four-county region.
 - b. A government rationale for supporting WSLE is that transferring passengers onto the four-mile rail line will free buses it can redeploy for more frequent local service.
 - i. Data and experience, including “transfer penalty” and truncated bus routes, do not appear to support this rationale.
 - ii. Metro Transit stated to the West Seattle Transportation Coalition in 2014 that it will cancel a bus route costing more than \$7 per rider (about \$10 in 2024 dollars). The September 2024 WSLE cost estimate of \$6-\$7 billion to serve 27,000 riders, puts its per rider expenditure on 2032 opening day at \$222,000-\$260,000 per rider (see Economics 3.2.a. below).
 - 1. Using ST estimates of 4 million WSLE riders per year and adding \$40 million per year cost for operations and maintenance, reduces per rider cost to \$1500 for the first year, eventually plateauing at \$600 per rider in perpetuity.
 - 2. If rail does not replace bus, and per-trip cost from point A to point B is not reduced, moving riders from bus to rail is not beneficial. If only the rider's trip is measured, without including distance, the result may be misleading. For example:
 - a. Neither Metro Transit nor Sound Transit appear to have made cost-benefit calculations to assess the transit cost effectiveness of WSLE.
 - b. Metro’s plan for WSLE to replace four miles of bus corridor means it will deliver \$10 /rider passengers to one station of a \$1500 /rider rail line, then use another \$10 /rider bus to pick up the portion of those riders who don’t continue on rail.

- c. Passengers who ride further on rail may also transfer to bus at the end of their rail segment.
 - iii. Electrification of the Metro bus fleet, and expansion of flexibly routed bus service that would connect riders more efficiently to destinations within and beyond West Seattle, would yield a far better cost-benefit ratio. It could be funded with a fraction of the \$6-\$7 billion estimated for a single, four-station WSLE route.
 - iv. Improving bus service should also include City of Seattle exercising its municipal authority to eliminate road bottlenecks to give buses more priority in traffic.
- 6. **The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail study and planning phase.**
 - a. ST's WSBLE DEIS outlined non-rail improvements that could be made on West Seattle-Downtown corridor, such as roadway upgrades, and bus, van and other transit additions to increase service.
 - b. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle-SODO corridor.
 - c. Presently, public and private roadway buses, vanpools and ride-share services can carry more riders than light rail, often faster and less expensively.
 - d. Unlike fixed rail, routes for non-rail options can be modified – unlike light rail -- as conditions change, since roadways provide transit flexibility and redundancy options that fixed rail does not.
 - 1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers
 - 2. King County Metro:
 - a. is planning to transition its entire fleet of buses to electric power.
 - b. has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas.
- 7. **The light rail bridge – that has not yet been designed, would extend 1.5 miles from SODO to Pigeon Point at a minimum 100 feet height over the Spokane St. viaduct, SR99, and the Duwamish River. This presents risks of rising expenses and construction delays, including:**
 - a. No passenger railroad bridge of this length and consistent height has ever been built.
 - b. The bridge will run over the [Seattle Fault earthquake and liquefaction zone](#), creating engineering challenges and downstream risks.
 - i. Structural shifting caused by the 2001 Nisqually earthquake contributed to the 2022 failure of the West Seattle high bridge, and its 2-1/2 year closure for repairs. The proposed WSLE bridge follows the same pathway, but at twice the elevation.

Section 3: Economics

1. **At the present \$6-\$7 billion estimate for WSLE, Sound Transit will have spent \$1.1-\$1.3 million per rider to put each passenger on the train** (including construction, interest payment, operations, and maintenance costs).
 - a. Opening day per rider WSLE cost is based on ST's May 12, 2023, email to the Federal Transportation Administration, estimating 5,400 boardings per day between 2032 and 2042 – as Metro Transit continues to run its C, H and 21X bus lines between West Seattle and downtown until the SODO-Downtown segment is complete in 2042.
 - i. After Year 1, expecting approximately 194,000 riders per year, per rider cost may drop to \$3107-\$3621 per rider, and by 2042, drop to \$381-\$330 per rider.
 - b. By 2042, it is estimated that Sound Transit will have spent an additional \$2 billion for the SODO-Downtown segment, including a second tunnel. Metro Transit will terminate Rapid Ride C, H and 21X bus service on the corridor. From that point, Sound Transit estimates WSLE ridership will increase to 27,000 boardings per day. Cost on opening day may thereby drop to \$296,000-\$334,000 per rider, calculating a \$8-\$9 billion total for the complete extension.
 - i. Depending on Sound Transit's amortization schedule for the \$8-\$9 billion total WSLE + Downtown segment construction expenditure, plus interest payments, plus \$40 million estimated annual WSLE operations & maintenance cost, overlaying annual ridership estimates of 4 million, per rider cost may plateau between \$600-\$1500 in perpetuity.
 - c. In advocating for WSLE rail to replace buses on the 4-mile SODO-WS corridor, Metro Transit is advocating to deliver \$10 per rider passengers to a \$600 to \$1.3 million per rider WSLE train station, for a four-mile ride, to a stop where they may transfer to another \$10 per rider Metro bus.
 - d. The non-profit Transportation Choices Coalition testified at Sound Transit's September 26, 2024, board meeting that price should be no object. Between Washington's powerful Congressional delegation able to funnel debt-relief capital to Sound Transit, and the perpetual \$1780 per year in Sound Transit taxes that every Pierce, King and Snohomish County household has been paying since 2017, TCC believes money will be perpetually available for light rail projects.
 - e. In 2022, Sound Transit reported a \$12 billion budget shortfall, then recast its accounting to appear \$6 billion in debt. At ST's September 19, 2024, board meeting, ST CEO Goran Sparrman and Deputy CEO of Megaproject Delivery Terri Mestas asserted that the \$6-\$7 billion cost for WSLE can be managed.
 - f. It would appear that, if cost is no object, Sound Transit could spend any amount needed for WSLE, and tunnel from SODO to the east bank of the Duwamish, use an immersed tube or other tunnel to cross beneath the Duwamish, then tunnel from the west bank to the West Seattle Junction, reducing most impacts listed here.
 - i. This project would require Sound Transit to generate a separate EIS.
2. **At \$6-\$7 billion (\$1.5 billion-\$1.75 billion per mile) for 4 miles (Seattle Transit Blog), WSLE is the world's second-most expensive urban rail project**, behind NYC's subway upgrade (\$2.8 billion /mile), but ahead of San Francisco's subway (\$920 million /mile)
 - a. The cost covers only the light rail segment between SODO and West Seattle

- b. Additional cost will be incurred for building the SODO to downtown Seattle tunnel link.
- 3. WSLE may present revenue losses and opportunity costs for transit across the region (Snohomish, King, and Pierce counties), and for the key light rail city of Seattle.**
- a. While city and county revenues have decreased, Sound Transit will eliminate businesses, services and properties that pay into municipal tax rolls.
 - i. Neither ST, Seattle nor King County has run cost-benefit analyses to judge whether trading a decade's worth of WSLE-caused tax revenue losses for anticipated future revenue will pencil out – given that:
 - 1. Neither ST nor the City of Seattle has calculated what net economic benefits WSLE will create for West Seattle, the CID and SODO, and
 - 2. While light rail creates benefits in some areas, West Seattle commerce and real estate markets up to now have not significantly suffered, even during the pandemic.
 - b. **At least 70 West Seattle businesses and services will be forced to move or close, but the final number can't be determined until ST chooses a WSLE alignment.**
 - i. In West Seattle, 500-1000 jobs connected to displaced businesses and services will be lost. In SODO and Chinatown-International District areas, additional businesses will be displaced or close, and more jobs lost.
 - ii. The number of businesses displaced will depend on the WSLE alignment ST finally chooses. [West Seattle blogger Marie McKinsey](#) offered this list of possible business displacements, extending from Jefferson Square (37 closures) to Delridge (West Seattle Athletic Club, Uptown Espresso, Skylark Cafe), to West Marginal Way.
 - iii. Patronage estimates by affected businesses (e.g., 7-11, Taco Time, Starbucks) average 1000 customers per day, with more for larger enterprises (e.g., Trader Joe's, Safeway).
 - iv. Businesses forcibly relocated have low survival rates, particularly in minority and low-to-middle income neighborhoods: 1974 Urban Renewal study: (<https://www.kcdc.org/wp-content/uploads/2022/10/A-Case-Study-of-the-Consequences-of-Displacement-Caused-by-Urban.pdf>). "The non-survival rate was highest among the small eating and drinking, food stores, and miscellaneous retail and services."
 - v. Demographic trends show movement of upscale, primarily White workers moving back to urban centers of employment and commerce, and non-White workers and businesses moving or (immigrants) taking up residence in suburban areas (see Appendix 5. 'Great Inversion')
 - 1. As these trends continue, it is even less likely minority businesses will be able to successfully relocate, and even less likely the employees of these businesses will find places they can afford to live.
 - 2. While light rail helps move people to areas of the city where they can recreate and consume, it does not support people who are providing the businesses and jobs for the more metropolitan population.

- c. Rather than create an estimated \$6-\$7 billion in lost WSLE opportunity costs for Seattle and the region, the money could be better invested in other transit options within the WSLE corridor and beyond, yielding a lower carbon footprint, and fewer environmental, social and economic impacts.
- 4. **Freight, public transit, emergency services and commuters will be disrupted, and productivity impacted for 5-8 years, as West Seattle's main roads north, west and south of the WS High Bridge are blocked during construction.**

Section 4: Local Environment and Global Climate

1. As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:

- **attracting new riders, and**
- **expanding walkable, car-free urbanism near three new West Seattle light rail stations.**
 - a. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e) forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6-3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total...").
 - 1. The restatement is used to extend the mitigation period by at least 50 years – to 2080, or later.
 - 2. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them.
 - 3. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period
 - 4. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit.
 - 5. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy
 - i. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032.
 - ii. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080.**
 - iii. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941 tons.
 - 1. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941 tons per year reduced, yields a payback period of 48 years – until the year 2080, to mitigate WSLE construction carbon.
 - b. **The Build option will only reduce car and light truck miles traveled by 0.02% compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total – Table 4.6-1,**

- “Regional Vehicle Miles Traveled and Average Daily Traffic Change”). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.
- c. **Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes.** This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.
 - d. **The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit’s construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 (“An Update on Public Transportation’s Impacts on Greenhouse Gas Emissions.”)**
 - TCRP 226 outlines a “land use effect” of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. “Station Development...”)
 - The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2,941 tons generated by the methodology Sound Transit uses in the WSLE FEIS.
 - This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly.
 - While the DEIS Appendix L4.6 states that “general FTA estimates” have been applied, no federal project the size of WSLE’s 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated.
 - e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.
 - f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle’s and King County’s goals are to achieve carbon neutrality by 2050.
 - However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won’t be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use.
 - As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day.
 - Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not.

- g. **The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated.** Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from [TreePAC.org](https://www.treepac.org/). Those trees would have absorbed an estimated 64,000 tons of carbon a year ([City of Seattle](#) & [One tree Planted](#)) – nearly half the carbon output from WSBLE construction.
2. **The City of Seattle can ill afford to lose tree canopy.** Seattle has lost 255 acres of trees since 2017 (acreage cut by Sound Transit within city limits may be included in the Seattle count). Globally [in 2023, forests and other land ecosystems emitted almost as much carbon dioxide as they absorbed](#), due to fires, deforestation, and other factors.
- a. Eliminating acres of forest will exacerbate Seattle’s heat islands, which are worst around light rail stations, areas where the city’s commerce and employment are concentrated, and within its low income and of-color communities, which Lower economic areas are more prone to heat adverse conditions, fewer parks and tree cover. They are less economically able to afford air conditioning or other means to keep cool.
 - Heat sink areas, King County Executive (& ST Chair) Dow Constantine’s "Three Million Trees Initiative", City of Seattle's Trees for Neighborhoods program, KC Land Conservation Initiative: <https://kingcounty.gov/en/legacy/elected/executive/constantine/news/release/2021/june/23-heat-mapping-results> (June 23, 2021)
 - b. The WSLE will eliminate three acres of north Pigeon Point Forest, plus 1-3 more acres of West Seattle green space, and beaver, salmon, heron and other species habitats there and on the Duwamish River and Longfellow Creek.
 - Sound Transit has not calculated costs for man-made elements to replace erosion control, storm water management, oxygen production, carbon sink, shade, and other ecosystem services provided by green infrastructure.
 - c. As Sound Transit runs its modest program to replace trees it has eliminated, and Seattle’s recent \$13 million in federal grants will fund planting trees in Delridge and the Chinatown International District , the two entities will simply be working back from the deficit ST will cause with WSLE.
 - d. Replacing mature trees with saplings is what Nature does after a natural disaster. ST is imitating a natural disaster.
3. **Under Washington’s Climate Commitment Act (CCA), Sound Transit’s claimed level of carbon emissions in the FEIS – 141,000 metric tons over five to six years of construction – qualify it as a “large quantity carbon emissions generator” (LQG). The LQG threshold is 25,000 metric tons of carbon per year.**
- a. The best way to avoid emission is not to generate them (see **Minnesota** below).
 - b. The WSBLE DEIS does not address purchases of carbon offsets, or other high-quantity mitigation plans for this massive output.
 - c. The Puget Sound Clean Air Agency’s (PSCAA) analysis finds “. the Chinatown International District and Duwamish Valley neighborhoods facing disproportionate air pollution impacts, impacts from WSBLE construction, and more sensitive health outcomes in the form of higher air quality-related hospitalizations.”

- d. PSCAA AQ Director Kathy Strange commented in 2022 on Sound Transit’s WSLE DEIS, that “...transportation emissions will be improved in the long-term because of light rail...” The data prove otherwise.
 - e. Currently, [Minnesota is the only U.S. state holding its agencies accountable to its climate goals](#). A provision in its 2024 transportation law requires both state and municipal transportation planning agencies to take the state’s climate goals into account when assessing new projects. **And it provides a guideline Washington State could emulate.**
- 4. Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE.**
- 5. Since the 1980s, federal transportation agencies and transit experts, including former ST CEO Peter Rogoff, have questioned the value of light rail for most urban areas. (See Appendix 8).**

Section 5: Equity

1. Sound Transit’s WSLE proposal does not prioritize equity.

- a. The WSLE will serve the more affluent parts of West Seattle, while travel from less affluent, more diverse areas with more mobility disadvantaged citizens will require more transfers and take longer
- b. A “transfer penalty” will affect riders arriving at stations by bus at ground level. They must either ride or climb multiple levels up or down to reach a train. At the Junction station, walk time may add five minutes to the transfer, and the wait time for the next train may add another 10.
- c. Light rail will not improve access for residents who live in West Seattle’s transit deserts (those lacking convenient access to transit within ¼ mile walk).
 - i. Metro buses re-deployed after the 2042 opening of WS-CID service will not deliver residents remaining in West Seattle to new locations of businesses and services WSLE will have displaced.
 - ii. WSLE will instead encourage more use of private vehicles to reach these locations.
- d. Elimination of the Frye Business Center and commercial properties to the north and south for construction of the Delridge and Avalon light rail stations will:
 - i. exacerbate the “food desert” of grocery and prepared food providers between North Delridge and California Ave SW, for the area’s mixed demographic communities
 - ii. eliminate the walkable/15-minute Delridge-Avalon neighborhood, and deprive these communities of gathering places, and medical, social, business and recreational services

2. To make way for light rail, WSLE will eliminate over one hundred houses and apartments.

- a. The full number of residential buildings to be razed cannot be estimated, as Sound Transit has not chosen a final route. It will bulldoze everything from single houses in Delridge to 92 apartments in Jefferson Square. The Executive Summary of the WSLE

FEIS indicates that the Preferred Alternative will require displacing 165 to 173 residential properties, and 132 to 133 businesses employing 1,230 people.

- b. Despite large numbers of new housing units and apartments built in West Seattle since 2014, rent and purchase costs have increased, not decreased. That has pushed out less wealthy residents (see *Seattle Times* May 12, 2024) and increased their needs to travel longer distances for work, shopping and entertainment, most often by car. Many have moved to other cities.
- c. Transit-oriented development (TOD -- dense housing, such as apartments, multiplexes, and ADUs) has been built along the Delridge, Avalon and East Junction bus routes of Rapid Ride H and C, and 21 and 128. Sound Transit will bulldoze a significant portion for the rail line, and not replace it for up to 10 years, further depriving West Seattle of affordable housing, while wasting public resources.

3. The Sound Transit Board has the authority to choose the No Build option for WSLE.

- a. Under Section 2 of the ST3 package that voters approved in 2016, the board must reconsider projects that are infeasible, unaffordable and/or unbuildable. WSLE is all three.
- b. Contrary to what regional and city leaders are saying, the WSBLE and WSLE light rail proposals can be re-considered, and better transit options can be chosen – under the No Build option
- c. No Build is a legitimate, legal, and responsible choice, which is included, under federal and state law, in all environmental reviews of large, disruptive transit construction projects. Based on the findings of the environmental process through this date, project sponsors should adopt the No Build option.
- d. The No Build option for WSLE will only affect the West Seattle corridor:
 - i. other ST3 projects could continue to be studied and implemented, as they are subject to a separate environmental process, and
 - ii. Sound Transit will still be able to get [Federal Capital Investment Grants](#) for non-light rail transit, and for expansion of high-capacity fixed-route bus transit.

Concluding Summary:

- 1. The Downtown-West Seattle (WSLE) light rail line should not be built (No Build option). Within the No Build option, the Ballard-Downtown segment should also be reconsidered.
- 2. Sound Transit's WSLE presents more disadvantages than advantages, including overwhelmingly negative social, economic and environmental impacts. As such, it fails to satisfy basic criteria set forth by ST3 and its FEIS for improving corridor transit. The costs, and negative environmental, economic and residential impacts of WSLE outweigh the benefits of building it
- 3. Current transit modes carry more passengers now, without transfers and wait times, than light rail promises to carry when completed. WSLE will degrade rather than improve the ridership experience.
- 4. The 146,000 tons of carbon that WSLE construction will generate – reduced from 614,000 tons in the Draft EIS -- plus elimination of and damage to acres of forest and habitat, will be more than the benefits of a short light rail line can mitigate through year 2105.

5. Choosing the light rail investment over more flexible, effective and cheaper transit modes presents opportunity costs for the City of Seattle, and the regional transit network.
6. Sound Transit can achieve better ridership by continuing to expand and electrify King County Metro and ST Regional Express bus services, on the West Seattle peninsula, W. Seattle-Downtown corridor, and beyond.

Any Sound Transit taxing district resident opposed to the construction of the West Seattle light rail extension has three paths of action:

1. Use emailtheboard@soundtransit.org to contact all board members. As 17 of its 18 members are elected officials, and accountable to voters, [each can be contacted directly](#) by their own constituents.
 - The Seattle members include City Council Member [Daniel Strauss](#), Mayor [Bruce Harrell](#), Council Member [Rob Saka](#) **, ST Board Chair [Dow Constantine](#) **, and King County Council Member [Girmay Zahilay](#). (** indicates lives in West Seattle). City Council Member Rob Saka chairs the City Council's Transportation Committee. [King County Council Member Teresa Mosqueda](#) also lives in West Seattle.
 - Include specific information from this document in messages to officials
 - Contact board and council members by letter, phone and email, and urge (or demand) that they:
 - Stand up for businesses, jobs, housing, communities, and the environment in Seattle.
 - Call for adopting the **No Build Option** still listed in the FEIS for WSLE and visible for years in the DEIS for WSBLE.
 - Require Sound Transit to consider cheaper, less destructive, lower carbon transit options for the Downtown-West Seattle corridor than rail.
 - Support using other modes, including buses, bus rapid transit, and other transit service connections to the regional rail network
2. Contact Port of Seattle Commissioners [Fred Felleman](#), Commissioner-Secretary [Ryan Calkins](#), Commissioner-Vice President [Toshiko Hasegawa](#), Commissioner-President [Hamdi Mohamed](#), Regional Transportation Manager [Geraldine Poor](#), Chief of Staff [Aaron Pritchard](#), and management staff [LeeAnne Schirato](#), [Kathy Roeder](#) and [Sabrina Bolieu](#).
 - Ask them to object vigorously and officially to impacts the WSLE bridge will cause, and that the Port of Seattle has opposed, including obstruction of the East and West Duwamish waterways, impairment of maritime traffic and businesses, damage to the Duwamish River and Longfellow Creek ecosystems, and a huge carbon footprint.
3. Email local business organizations that will be affected:
 - * [West Seattle Chamber of Commerce](#)
 - * [West Seattle Junction Association](#)

Appendix

Additional Considerations from Research Literature

1. Consumer willingness to fund light rail development decreases as cost increases

[Economists at the Federal Reserve Bank of St Louis](#) showed that when consumers understand the actual costs of getting light-rail services, the amount is generally more than they are willing to pay.

Nationwide, annual light-rail operating costs (\$778.3 million) far exceed fare revenue (\$226.1 million). The balance (\$552.2 million) is paid for with tax dollars. Examples (see also Snohomish-King-Pierce below): Fare revenues cover only 28.2% of system operating costs for St. Louis, 19.4% for Baltimore and 21.4% for Buffalo. If construction costs are added, losses become so large, no light-rail system can possibly recoup its costs.

Based solely on dollar cost, economists at the Federal Reserve Bank of St. Louis suggest that annual light-rail subsidies in St. Louis could instead be used more efficiently to buy a hybrid Toyota Prius every five years and pay annual maintenance costs of \$6,000 for 7700 low-income transit riders – with minimal pollution increases, and only a 0.5 percent increase in traffic congestion. Funds would still be left for all other MetroLink riders to pay for ride-share and bus fares.

Houston: When [Houston Metro proposed the Purple line in 2008](#), it estimated a \$591 million cost, and 28,750 weekday riders. By September 2020, costs reached \$822 million, with daily expected ridership decreased to 5,230, meaning a per rider cost of about \$150,000 to build the Purple Line.

Snohomish-King-Pierce Counties:

1. [Sound Transit revenues do not cover its operating expenses](#)
 - a. Sound Transit farebox revenues in 2023 covered only 16% of Link light rail operating costs (lower than the 40% minimum policy threshold), 9% of ST Express bus operating costs (below the 20% threshold), and 7% of Sounder costs (below the 23% threshold).
 - b. Revenue vs. cost gaps widen more when construction costs are added. Examples:
 - i. Adding together operations, maintenance and construction costs, light rail fare revenues cover less than 3%.
 - ii. For Sounder North commuter rail, ST over-estimated ridership by 90%, and underestimated total costs vs. farebox revenue by 95%.
 - c. As regional revenues will never cover or recoup its full costs, Sound Transit must add millions of dollars in federal grants and borrowed money to cover them.

2. Three factors drive excessive U.S. transit project costs

As Sound Transit cost overruns have become chronic, the [New York experience provides a cautionary tale](#) about how to structure transit projects, and how to avoid pitfalls.

Factors that add approximately 85% to costs include extra money going to red tape, wasted contingencies, paying workers during delays, defensive design, and profit. Specific factors include:

- Lack of design standardization: this leads to fewer economies of scale, the inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process.

- Labor: 40-60% of the project's hard costs in the U.S. Labor costs in low-cost cases: Turkey, Italy, and Sweden are in the 19-30% range; Sweden, the highest-wage case among them, is 23%.
- U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher.

3. Station development does not generally benefit low-income transit users

A [2019 University of Houston study](#) finds mixed effects on the welfare of neighborhoods after light rail construction. Researchers estimated an \$11,000 average increase in median income for neighborhoods near the new rail line development; but most gains go to high-income neighborhoods, while low-income neighborhoods see their income decline. The observed income polarization may be explained by poverty magnet and gentrification effects occurring simultaneously across the treated neighborhoods.

Light Rail Transit (LRT) does not appear to consistently deliver on its progressive policy goals of alleviating labor-skill mismatch, creating time cost savings, and increasing income mobility.

4. Light rail development does not reduce congestion

[Los Angeles: While light rail investments may increase transit accessibility and ridership within high-demand corridors, it does not reduce congestion.](#)

5. Per Capita Transit Ridership Is Declining

[Since 2013, U.S. transit ridership has declined, despite continued growth in population.](#)

Ridership has peaked and decreased seven different times since 1980, but overall, transit ridership per capita has decreased by nearly 15%. Researchers are evaluating economic considerations, fuel price, changing modal choices, and other areas as possible causes for the decline.

Demographic trends help to explain declining transit usage:

a. The U.S. [population is aging](#). While young age cohorts have a higher propensity for transit use, they represent a lower share of the population.

b. Simultaneously, significant population declines in some of the counties with high-quality transit service and use is being mirrored by population growth in counties with lower levels of transit service and use. Rapidly growing counties had half the rate of commuting to work by transit as did rapidly declining counties.

c. [Over 90% of U.S. population growth in 2023 occurred outside of its 124 largest cities.](#)

Among the 124 cities that the U.S. Census Bureau reports with populations over 200,000, about a third have lost population except 14 over 200,000 populations cities in Texas, and nine in Florida. Medium-sized cities in Florida, the Carolinas, and Las Vegas suburbs also added to the population. Americans are presently trading dense, urban, transit-oriented cities for less expensive, more spacious living elsewhere. How this will play out in transit development and politics are key questions.

6. Great Inversion: socio-economic status and race re-sort urban-suburban residency

Suburbia increasingly sorted on bases of socio-economic status and race ([Nijman, 2020](#); [Nijman & Clery, 2015](#)). As suburbs continue growing:

- a. based on economic affordability ([Kolko, 2017](#)),
- b. central-cities appear to revive and renew growth, as city as “the office,” especially for growing numbers of self-employed and freelancers, in the new urban, knowledge transfer and networking economy, that thrives in a high density and high circulation environment ([Carlino, 2015](#); [Kloosterman, 2020](#); [Scott, 2017](#)).

Cities and city centers as preeminent sites of consumption, consumer services, and amenities: [Glaeser, Kolko, and Saiz \(2000\)](#). Also, rise of cities as sites of *consumption* ([Jayne, 2005](#))

Significance of actual vs. relative numbers of workers, types of workers, incomes, and vulnerabilities of ‘gig economy’ and ‘sharing/platform economy’: ([Graham, Hjorth, & Ledonvirta, 2017](#); [Davidson & Infranca, 2016](#); [Shambaugh, Nunn, & Bauer, 2018](#)).

7. Public transit is losing its customer base

During the pandemic, people formed new mobility habits, and most are not returning to regular use of urban buses and trains. In a 2022 survey of 38 transit agencies worldwide, researchers found a 10% loss in the transit customer base, as reported by the [International Association of Public Transit](#).

As of spring 2024, Sound Transit has not yet consistently reached its original 2010 light rail ridership target to the University District, even including the extension to Northgate, according to the U.S. Federal Transit Administration’s National Transit Database (NTD). ST’s original goal was an average of 2.7 million boardings per month. It has touched that level in a few months since 2018, such as for the Taylor Swift events in SODO. But it has not reached this ridership level on average in 2024. Across all central Puget Sound transit agencies, NTD reports transit ridership as of April 2024 was 30% lower than in pre-pandemic 2019.

8. Federal transit agencies and experts have questioned the value of urban light since the mid-1980s:

[Ken Orski, Urban Mobility Corp. transportation management consultant](#), quoted in mid-1986:

"Mass transportation is the way the other fellow is supposed to get to work."

[Sam Zimmerman, USDOT Urban Grants Manager](#), quoted in June, 1986 (Zimmerman helped Approve Seattle’s 3rd Ave tunnel project):

- “No city is a paradigm. Good transit solutions are showing up differently in different locations. Transit agency people are ... *involved in selling a product that is obsolete for the emerging market.* (emphasis added). The traditional transit market is relatively small, not growing, and travels mainly downtown, which is where buses and trains do the best job.”

[Rick Setner, UMTA Deputy Director](#) (now FTA), quoted at Washington, DC, in June 1986:

- Determining cost effectiveness and overall cost per hour of user benefit is a complex formula. It reckons all costs (capital, interest, operations, maintenance), divided by hours of benefit — including travel time savings to existing & new riders, plus net additional new riders.
- Transit agencies want benefit hours to increase, to make the most benefit for most people. Moving people from bus to rail is not beneficial if:
 - rail doesn't replace bus, and
 - the agency is just measuring per-trip cost of a single trip from point A to point B, without including full trip distance. The result may be misleading.

- Light rail is not flexible; it's the equivalent of a Maginot Line (see France post-World War 1). Each NYC line in 1938 carried more than all three subway lines do now — because population has shifted to suburbs.

Alan Pisarski, author of [Commuting in America](#), quoted in June 1986:

- “A low density, highly dispersed market without substantive corridors is not something traditional transit can respond to. One of the great games is defining the notion of what comprises “transit.” It gets broader every year. Today, it’s basically everything that is not an individual car: HOV lanes (Shirley Highway HOV lane, VA, is America’s busiest transportation corridor outside NYC), taxis, car & van pools.”
- “Many city officials look at light rail as a panacea: it’s new, glitzy, and makes them a “world class” city. In some cities it’s appropriate, in many more, it has very limited application, or it is not appropriate at all, because it’s cost prohibitive.”
 - “If you have six miles to do, it makes no sense to build six miles of tunnel, and/or lay six miles of track and wire. Instead of looking to be “world class” (a PR purpose), look to move people around (transit purpose).”
- “Traditional transit service is suburb to downtown office. Suburban 1980s jobs grew three times more than downtown areas, creating a dispersed pattern of commuter travel, which cannot be easily and conveniently served. It’s the reason why there’s so much traffic congestion: we’re more dependent on cars.”
- As of the mid-1980s:
 - Only 6-8% of employees working in station-based office developments use rail to commute to work. Up to 94% use SOVs (single occupancy vehicles). While rail stimulates development, it will create more traffic congestion than before, not reduce congestion.
 - Rail transit successfully stimulates development around suburban rail stations, but only plays a modest role in serving people who work in station-based offices.
 - Building new rail lines may actually have the perverse effect of exacerbating congestion & inequity (see **3. and 4.** above).

USDOT Undersecretary Peter Rogoff, May 18, 2010, addressing Federal Reserve Bank of Boston, MA (Rogoff is former Sound Transit CEO)

- Financial difficulties facing mass transit networks are partially due to an “unnecessary focus” on rail expansion over bus improvements. Using the flexibility of buses, “you can move a lot of people at very little cost compared to rail.”
- “Paint is cheap, rails [sic] systems are extremely expensive”. He further stated, “...paint a designated bus lane on the street system. Throw in signal preemption, and you can move a lot of people at very little cost compared to rail.”

UMTA 1995 COMPARISON OF SELECTED RAIL SYSTEM COSTS, RIDERSHIPS ^

	<u>LENGTH</u>	<u>COST</u>		<u>AVG. RIDERS PER DAY</u>	
	<u>miles</u>	<u>estmt'd.</u>	<u>actual</u>	<u>estmt'd.</u>	<u>actual</u>
Buffalo, NY	6.4	\$336M	\$536M	184,000 (1995)	35,000
Baltimore	14.0	\$450M	\$990M	206,000 (1980)	55,000*/**
Wash., DC	70	\$2.5B	\$10B	800,000 (1990)	500,000**
Portland, OR	15	\$143M	\$214M	42,500 (1995)	20,000
Sacramento	18	\$136M	\$196M	20,000 (1990)	13,000
San Francisco	71	\$700M	\$1.7B	255,000 (1975)	200,000**
San Diego	20	\$***	\$258M	12,000 (1981)	30,000
Atlanta	32	\$1.37B	\$2.9B	578,000 (1995)	195,000**
Miami, FL	20	\$795M	\$1.05B	202,000 (1995)	36,000**

M = million / B = billion

Atlanta & Washington figures assume full system in place

* Baltimore did not open until 1984

** Indicates heavy rail system. Systems are generally funded with 75% federal, 25% local money.

*** San Diego had no federal funding for its first 15.9-mile line

^ Source: Urban Mass Transit Administration

8. [City of Seattle critique of ST3 DEIS](#) (quote of excerpts):

- Sound Transit is considering cost savings refinements in response to its 2021 ST3 Realignment. Some of these proposed strategies are drastic.
 - We discourage scope reductions that do not bring commensurate benefit to the system and its riders, and that are not consistent with what was committed to voters.
 - We do not support strategies that would reduce access to the system.
- The City supports studying refinements that help control costs and provide meaningful benefits to local communities and the broader transit system and its riders, including:
 - Mix-and-match refinements for flexibility to choose segment alternatives that provide greatest benefit or fewest impacts;
 - Refinements to stations that would improve safe, non-motorized access;
 - Refinements that would avoid, minimize, or mitigate adverse project impacts.

9. [Pandemic-caused vacancy rate increases in downtown areas](#)

Between April 2019 and January 2023, [Seattle had the second-highest downtown commercial vacancy rate in the U.S. \(14.2%\)](#). [“Seattle's office vacancy rate reached 23.2% in July 2024, according to a recent report by Commercial Edge Research,](#) highlighting the city's struggle to adapt to post-pandemic market conditions,”

While Metro Transit ridership in 2024 has recovered to 75% of pre-COVID levels, full ridership recovery is questionable as work from home + hybrid structures continue, and central employment and commerce locations diversify from downtown Seattle.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>There are many reasons not to grant a Record of Decision for this project on November 29, 2024. The proposed light rail track will bulldoze homes and businesses, cut down acres of trees, and create “heat islands” and “food deserts” in our poorer neighborhoods. And it will NOT reduce greenhouse gas emission, improve transportation efficiency, or improve the mobility of West Seattle residents.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>
2	<p>The original \$1.7 billion ST3 budget for WSLE is now \$6-\$7 billion. Listed Rapid Ride corridor improvements have not been made, and Sound Transit’s 2030 delivery date will not be met. Voters are getting a different rail plan than Sound Transit presented as ST3 in 2016. The ST3 proposal did not describe Pigeon Point deforestation, “irreparable” habitat damage, or any notice of a large carbon footprint from construction as documented in earlier Sound Transit projects. Since 2016, ST has altered proposed routes, plans, and station configurations without filing any DEIS amendments, or providing public notices as changes are made.</p>	<p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency’s financial situation and to inform a financially sound project to be baselined. Refer to Appendix F, Public Involvement, Tribal Consultation, and Agency Coordination, for more information on the public involvement activities and notifications that occurred between 2018 and 2024 during planning and Environmental Impact Statement (EIS) preparation for the West Seattle Link Extension.</p> <p>Consistent with the State Environmental Protection Act (SEPA), the West Seattle Link Extension Final EIS provides the public and decision makers with information about the West Seattle Link Extension “at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified” (Washington Administrative Code [WAC] 197-11-055(2)). This is also consistent with the National Environmental Policy Act (NEPA), which provides that “Agencies shall integrate the NEPA process with other planning at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts” (40 Code of Federal Regulations 1501.2).</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
3	<p>Since the 2016 ST3 vote, Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE. With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension (WSLE) does not satisfy the ST3 and DEIS criteria, and should not be built. The experts found that:</p> <ul style="list-style-type: none"> • WSLE transit times and therefore ridership will degrade, not improve West Seattle transit service after the WSLE and Ballard LE open in 2032 and 2042 respectively • The construction generation of carbon will be more than carbon-reducing impacts of WSLE trains can mitigate over five future decades of WSLE operation. • Acres of forest and habitat will be eliminated, and much more of it irreparably damaged • Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network: • Economic development in West Seattle and Chinatown-International District will be set back for at least a decade • Equity, community-building and social justice will be set back at least a decade, • And raising the question, based upon the newest, September 2024 WSLE cost estimate: "How can six to seven billion dollars be better spent to improve public transit?" 	<p>Your support for the No Build Option has been noted.</p>
4	<p>Lower carbon, less expensive and less destructive public transit options than WSLE have been studied by Sound Transit, are available and serving West Seattle riders better now than rail will in the future, including but not limited to:</p> <ol style="list-style-type: none"> a. Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane b. Add north and south Busway exits from east end of West Seattle Bridge c. Add to exclusive bus lanes in West Seattle d. Complete Metro Transit initiative to electrify bus fleet 	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>
5	<p>1. The WSLE light rail plan will not improve transit or rider experience on the Downtown- West Seattle corridor. It will make them worse.</p> <ol style="list-style-type: none"> a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though heavy traffic may cause it to take longer. b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see "transfer penalty" in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer. c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers. 	<p>Chapter 3, Transportation Environment and Consequences, of the Final EIS provides ridership forecasts and travel times.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>2. Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.</p> <p>a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.</p> <p>b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)</p> <p>i. The FEIS sorts ridership forecasts based on several options:</p> <p>a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built</p> <p>b) Two station scenario, without Avalon station</p> <p>c) Three station scenario with Delridge, Avalon and Junction stations</p> <p>ii. Appendix 2 of Sound Transit's Transportation Technical Report shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.</p> <p>c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day.</p> <p>d. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.</p> <p>i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix,** Per Capita Transit Ridership Is Declining**).</p>	
6	<p>a. The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase .ST's WSLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service.</p> <p>b. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle-SODO corridor.</p> <p>c. Presently, public and private roadway buses, vanpools and ride-share services can carry more riders than light rail, often faster and less expensively.</p>	<p>Refer to response to comment 3 regarding mode selection for the West Seattle Link Extension. A list of bus route service changes for each of the Build Alternatives is provided in Section 3.3.2, Build Alternatives, of Appendix N.1, Transportation Technical Report of the West Seattle Link Extension Final EIS. Bus service assumptions for both the No Build Alternative and Build Alternatives were developed by King County Metro Transit (Metro) and Sound Transit as part of Appendix B, Transit Service Integration Technical Memorandum, of Attachment N.1A, Transportation Technical Analysis</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>d. Unlike fixed rail, routes for non-rail options can be modified – unlike light rail – as conditions change, since roadways provide transit flexibility and redundancy options that fixed rail does not.</p> <p>1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers</p> <p>2. King County Metro:</p> <p>a. is planning to transition its entire fleet of buses to electric power.</p> <p>b. has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand</p> <p>a) Metro Flex van service in some, but not all underserved WS areas.</p>	<p>Methodology, in Appendix N.1. Bus service would be restructured to integrate with the project, which would result in removing or truncating some lines but generally replacing them with reliable, high frequency light rail service. The bus service hours savings from removing or truncating routes would be redeployed elsewhere in accordance with Metro's service guidelines. The 2042 Build Alternatives assume there will be changes to bus service in the West Seattle Link Extension project corridor to integrate with the new light rail line. The service changes are based on Metro Connects and coordination with Metro regarding this project.</p>
7	<p>As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:</p> <ul style="list-style-type: none"> • attracting new riders, and • expanding walkable, car-free urbanism near three new West Seattle light rail stations. <p>a. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e) forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6-3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total...").</p> <ol style="list-style-type: none"> 1. The restatement is used to extend the mitigation period by at least 50 years-to 2080, or later. 2. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them. 3. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period 4. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit. 5. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy <p>i. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032.</p>	<p>Refer to Section 4.6, Air Quality, and Section 4.10, Energy Impacts, of the West Seattle Link Extension Final EIS for air quality and energy analyses. As described in Section 4.6.6.1.2, Construction Emissions, construction emissions were calculated using Federal Transit Administration's (FTA's) Transit Greenhouse Gas Estimator V3.0. Printouts of the results from this estimator are available in Appendix L4.6E, Greenhouse Gas Analysis. Section 4.6.6.1.2 also discusses the emerging nature of this field of analysis and provides additional context for interpreting these results.</p> <p>Refer to Appendix L4.6E for more information on the greenhouse gas emissions modeling.</p> <p>For more information on Sound Transit's environmental policy and sustainability initiatives, please visit Sound Transit's website at https://www.soundtransit.org/get-to-know-us/environment-sustainability.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>ii. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080. **</p> <p>iii. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941tons.</p> <p>1. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941tons per year reduced, yields a payback period of 48 years - until the year 2080, to mitigate WSLE construction carbon.</p> <p>b. The Build option will only reduce car and light truck miles traveled by 0.02% compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total -Table 4.6-1, "Regional Vehicle Miles Traveled and Average Daily Traffic Change"). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.</p> <p>c. Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes. This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.</p> <p>d. The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.")</p> <ul style="list-style-type: none"> • TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...") • The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2,941 tons generated by the methodology Sound Transit uses in the WSLE FEIS. • This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly. • While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated. 	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.</p> <p>f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's and King County's goals are to achieve carbon neutrality by 2050.</p> <ul style="list-style-type: none"> • However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use. • As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day. • Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not. <p>g. The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated. Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from TreePAC.org. Those trees would have absorbed an estimated 64,000 tons of carbon a year (City of Seattle & One tree Planted)- nearly half the carbon output from WSLE construction.</p>	

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From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- West Seattle Light Rail Record of Decision - Nov 29, 2024
Date: Wednesday, November 27, 2024 9:26:35 AM

From: Diane Hamilton <diane_h1@hotmail.com>
Sent: Friday, November 8, 2024 10:06 AM
To: Assam, Mark (FTA) <Mark.Assam@dot.gov>
Subject: Fw: West Seattle Light Rail Record of Decision - Nov 29, 2024

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Mark Assam, Federal Transit Administration,

The West Seattle Light Rail plan is not giving residents what we voted for and should be halted for further analysis. The \$6-7 billion dollar cost would make it the world's most expensive urban rail system and still would require riders to switch trains south of Downtown Seattle and does not reach far enough into West Seattle. It would displace more than 70 businesses which would hurt our local economy not to mention the 500-1000 jobs that will be lost by that economic hit.

It would also displace more than 100 homes and apartments and many of these residents have lived here for 10, 20, even 30 years so the homes we have known and created will be destroyed. Even those homes and apartments that will be able to remain will still have their entire communities destroyed as we know them.

Please pause this project until it can be done in a way that makes sense and doesn't cost billions of dollars for not providing what it promised in the beginning.

Sincerely,

Diane C Hamilton

4044 32nd Ave SW

Seattle, WA 98126

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The West Seattle Light Rail plan is not giving residents what we voted for and should be halted for further analysis. The \$6-7 billion dollar cost would make it the world's most expensive urban rail system and still would require riders to switch trains south of Downtown Seattle and does not reach far enough into West Seattle. It would displace more than 70 businesses which would hurt our local economy not to mention the 500-1000 jobs that will be lost by that economic hit.</p> <p>It would also displace more than 100 homes and apartments and many of these residents have lived here for 10, 20, even 30 years so the homes we have known and created will be destroyed. Even those homes and apartments that will be able to remain will still have their entire communities destroyed as we know them.</p> <p>Please pause this project until it can be done in a way that makes sense and doesn't cost billions of dollars for not providing what it promised in the beginning.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- West Seattle light rail
Date: Wednesday, November 27, 2024 9:26:10 AM

-----Original Message-----

From: Gale Sketchley <gsketchley@comcast.net>
Sent: Friday, November 8, 2024 4:19 PM
To: Assam, Mark (FTA) <Mark.Assam@dot.gov>
Subject: West Seattle light rail

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Sent from my iPad This decision to go ahead with Sound Transits preferred option was pushed through with little transparency and. many legitimate concerns. Research was ignored regarding environmental and pollution issues,Possibly breaking some laws. The cost over runs in the billions will eventually be on the tax payers back. The no build option was never really addressed. The public really is at the mercy of this board who did not do proper investigation on the above mentioned concerns. Please address these at your next board meeting. Thank you Gale Sketchley.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>This decision to go ahead with Sound Transits preferred option was pushed through with little transparency and many legitimate concerns. Research was ignored regarding environmental and pollution issues, Possibly breaking some laws. The cost over runs in the billions will eventually be on the tax payers back. The no build option was never really addressed. The public really is at the mercy of this board who did not do proper investigation on the above mentioned concerns. Please address these at your next board meeting.</p>	<p>Consistent with the State Environmental Protection Act (SEPA), the West Seattle Link Extension Final Environmental Impact Statement (EIS) provides the public and decision makers with information about the West Seattle Link Extension “at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified” (Washington Administrative Code [WAC] 197-11-055(2)). This is also consistent with the National Environmental Policy Act (NEPA), which provides that “Agencies shall integrate the NEPA process with other planning at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts” (40 Code of Federal Regulations 1501.2). The EIS has been prepared using approximately 10 to 15 percent level of design. This level of design allows for meaningful evaluation of alternatives, impacts, and potential mitigation measures.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency’s financial situation and to inform a financially sound project to be baselined.</p>

From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- Citizen Input for West Seattle Light Rail (Sound Transit) Record of Decision, ROD release date Nov. 29, 2024
Date: Wednesday, November 27, 2024 9:29:25 AM
Attachments: [Final RethinkTheLink, Environmental Conclusion, version 5.1, Nov 13, 2024.pdf](#)

From: MartinWesterman <artartart@seanet.com>
Sent: Thursday, November 14, 2024 7:21 PM
To: Assam, Mark (FTA) <Mark.Assam@dot.gov>
Cc: Niles globaltelematics.com <Niles@globaltelematics.com>; Martin Gondola Pagel <mjpagel@gmail.com>; Marilyn Kennell <mkennell@gmail.com>; Conrad Gondola Cipoletti <conrad.cipoletti@gmail.com>
Subject: Citizen Input for West Seattle Light Rail (Sound Transit) Record of Decision, ROD release date Nov. 29, 2024

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Greetings Environmental Specialist Assam,

I'm forwarding West Seattle Light Rail Environmental Impact Statement-Conclusion (EIS-C) version 5.1, which supersedes all previous versions, as
Citizen Comment for Entry into the WSLE (Sound Transit) Record of Decision. We respectfully request an FTA response.

This is an independent assessment of the environmental impact of the Sound Transit West Seattle-Link Extension (WSLE) light rail proposal. This final, November 14, 2024 version is now submitted by [Rethink The Link](#) (RTTL) and Regional Transit Colleagues.

Key environmental findings from our research include research omissions and absences of data by Sound Transit in several areas:

- No Modal Alternatives Analysis conducted, making choice of light rail to serve the West Seattle-Downtown Seattle corridor questionable.
- Carbon calculations and reductions are not transparent, mitigation strategy takes 50-80 years to effect
- \$1.3 million cost per rider on WSLE opening day (5400 riders, \$7 billion cost)
- Opportunity costs not calculated: 10 year's loss of business and property tax revenues for Seattle and King County, degrading of transit service and ridership, degrading of community equity, irreparable environmental damage, no budget calculation for man-made elements to replace erosion control, storm water management, oxygen production, carbon sink, shade, and other ecosystem services

Destruction of forest canopy and habitat will exacerbate heat islands, and lose natural carbon absorbing resources

Full analysis by Rethink The Link and Regional Transit Colleagues is attached.

All the best,

Martin Westerman, John Niles, Martin Pagel, Marilyn Kennell

West Seattle Light Rail Environmental Impact Statement-Conclusion (EIS-C)

Citizen Comment for Entry into the WSLE Record of Decision With FTA Response Respectfully Requested

An independent assessment of the environmental impact
of the Sound Transit West Seattle-Link Extension (WSLE) light rail proposal

Submitted by Rethink The Link (RTTL) and Regional Transit Colleagues

Revision 5.1 November 14, 2024 | Replaces earlier versions

Hot linked documents should be considered as attached to this document.

Comments or Questions? Contact RTTL at contact@rethinkthelink.org

Section 1: Executive Summary

The Ballard-Downtown-West Seattle light rail discussion started from the premise that roadway-based modes could not handle peak period passenger demand in that corridor. Thus, in 2016, Sound Transit presented a West Seattle-Ballard link extension (WSBLE) light rail proposal in its ST3 transportation package. It offered simple criteria for voters to consider:

- improve public transit,
- encourage economic development, equity, community-building and social justice,
- protect the environment.

Sound Transit's January 2022 WSBLE Draft Environmental Impact Statement (DEIS) was designed to show that:

- the simple criteria outlined in ST3 would be satisfied, and
- WSBLE's proposed advantages would outweigh its disadvantages.

In the 2016 ST3 package, and the 2022 Draft EIS, the West Seattle and Ballard light rail segments were combined into one project routed through downtown Seattle. As changes to the Ballard portion required additional work, Sound Transit and the USDOT Federal Transit Administration (FTA) separated Ballard into its own project, and moved forward with a discrete West Seattle (WSLE) environmental review process. WSLE has been separated again into West Seattle-SODO and SODO-downtown segments, and ST has now initiated a new EIS review process for the Ballard-downtown portion.

Independent transit experts present their findings here, based on:

- researching and analyzing information from the West Seattle sections of the 2022 WSBLE DEIS, public comments submitted about the DEIS, and the Final EIS (FEIS) released September 20, 2024,
- related transit studies and historical records, (see [Appendix](#) of this document), and
- comments to Sound Transit's Board of Directors after their selection of a WSLE trackway route on October 24, 2024.

With Sound Transit estimating a \$6.5-\$7.1 billion cost for WSLE alone, funding for the Ballard project's estimated \$12 billion cost could be delayed or even canceled. This stems from Sound Transit

historically underestimating costs, over-estimating ridership, delaying projects, and now approaching its debt ceiling horizon in the next few years.

Given these circumstances, Sound Transit cannot confirm when and whether WSLE may tie into the larger light rail network. In the FEIS, it forecasts 27,000 daily riders on WSLE, but it will not deliver that many until 2042, when the SODO-downtown tunnel segment is completed – requiring additional funds and creating additional impacts. Between 2032 (expected WSLE delivery date) and 2042, King County Metro will continue running its West Seattle-downtown buses. This led ST to inform the FTA (by email 5/12/23) that expected WSLE ridership will be 5400 per day for the 2032-2042 period.

Thus, WSLE will not deliver on claims summarized in FEIS ES.2.3, that it “is expected to reduce dependency on single-occupancy vehicles, slow down growth in vehicle miles traveled, conserve energy, and reduce greenhouse gas emissions.” It will not “reduce daily vehicle miles traveled by approximately 17,000 by 2042, helping to achieve Washington state’s greenhouse gas emissions goals.”

The environmental process and analysis for this project is also flawed by Sound Transit never having conducted a Modal Alternatives Analysis or Major Investment Analysis.

This analysis would have informed the decisions that Sound Transit’s Board made in choosing high-capacity transportation (HCT) mode(s) for the Downtown-SODO-West Seattle corridor. Items the analysis would have likely revealed:

1. light rail is less cost effective on a per rider basis than bus and bus rapid transit (BRT). With no evidence of Sound Transit conducting this analysis, it has failed the board, and called the board’s choice of light rail into question (See **Section 5, Item 4** for details).
2. Bus alternatives could be deployed to serve the corridor for less than \$1 billion, and would most likely attract more transit riders than the additional 2000 that Sound Transit’s FEIS predicts will ride WSLE by 2042 (see Section 2, Ridership 2.d. below).

Sound Transit’s environmental review process has revealed more disadvantages than advantages with the WSLE. With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension does not satisfy the ST3 and DEIS criteria and should not be built. Expert evaluation of the environmental record shows that:

- WSLE transit times and therefore ridership will degrade West Seattle transit service, not improve it after the WSLE and Ballard LE open in 2032 and 2042 respectively
- The construction-generated carbon will be more than passenger loads on WSLE trains and TOD land use effects can mitigate over five future decades of WSLE operation.
- Acres of forest and habitat will be eliminated, and much more of it irreparably damaged
- Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network:
 - Economic development in West Seattle will be set back for at least a decade
 - Equity, community-building and social justice will be set back at least a decade,
 - -- raising the question, based upon the newest, September 2024 WSLE cost estimate: “How can six to seven billion dollars be better spent to improve public transit?”

The Sound Transit Board can and should choose the No Build option for the WSLE.

- [Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016](#), allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.
- ST Executive Corridor Director Cahill Ridge's told the November 2017 West Seattle Transportation Coalition public meeting that ST "has no Plan B" for WSLE if financial, disruptive technology or other factors arise. He was incorrect. ST has several Plan B options available.
- Lower carbon, less expensive and less disruptive and destructive public transit options than WSLE have been studied by Sound Transit, are available now, and serving West Seattle riders better than rail will in the future. Options include, but are not limited to:
 - a. Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane
 - b. Add north and south Busway exits from east end of West Seattle Bridge
 - c. Add to exclusive bus lanes in West Seattle
 - d. Complete the Metro Transit initiative to electrify its bus fleet
- No Build is a legitimate, legal, and responsible choice, included under federal and state law in all environmental reviews of large, disruptive transit construction projects. ST3 project sponsors can and should consider this option and should note that the facts overall point to selection of No Build.

This document addresses the West Seattle link extension specifically, and the WSLE generally. It contributes summary information to the decision-making processes for:

- local and state government officials who regulate and influence Sound Transit decision making, and
- citizens who pay significant taxes (see "revenues vs. costs" below) to fund Sound Transit, in the expectation that their government will provide improved mobility services.
- government decision makers who have to decide what the WSLE Record of Decision (ROD) will finally state as the result of the environmental process for WSLE.

Section 2: Current Transit Ridership and Forecasts for West Seattle-Downtown Corridor, and Region

- 1. The WSLE light rail plan will not improve transit or rider experience on the Downtown-West Seattle corridor. It will make them worse.**
 - a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though it may take longer if traffic is heavy.
 - b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfer times in West Seattle and SODO (see "transfer penalty" in [Equity 1.b](#) below). Traffic may still be a factor causing bus rides to take longer.
 - c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers.
- 2. Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.**
 - a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to

approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.

- b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)
 - i. The FEIS sorts ridership forecasts based on several options:
 - (a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built
 - (b) Two station scenario, without Avalon station
 - (c) Three station scenario with Delridge, Avalon and Junction stations
 - ii. Appendix 2 of [Sound Transit's Transportation Technical Report](#) shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.
 - c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro Transit, whose 2020 West Seattle-Downtown corridor count was 27,000 riders per day.
 - d. The Final EIS on page 3-2 states, "The addition of the West Seattle Link Extension to the regional transit system would result in about 2,000 net new daily transit trips by 2042." This number is:
 - i. not mentioned in the FEIS Executive Summary and is not otherwise publicized by Sound Transit on its website or in any other documents,
 - ii. contradicted by ST's 5/12/23 email to FTA.
 - e. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.
 - i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see **Appendix 6., "Per Capita Transit Ridership Is Declining"**).
3. [Sound Transit is not building what voters approved](#) as ST3 in 2016:
Voters are getting a different rail plan than Sound Transit presented as ST3 in 2016:
- i. The original Ballard-West Seattle line (WSBLE) is now two separate lines – BLE and WSLE
 - ii. **The \$1.7 billion ST3 budget for WSLE is now \$6-\$7 billion.** Listed Rapid Ride corridor improvements have not been made, and WSLE's 2030 delivery date will not be met.
 - iii. The ST3 proposal did not describe Pigeon Point deforestation, "irreparable" habitat damage, or give any notice of a large carbon footprint from construction as documented in earlier Sound Transit projects.
 - iv. Additional carbon and pollution generated from 5-8 years of traffic congestion is not specified in the DEIS but may be tallied in SDOT's (Seattle Dept. of Transportation) annual carbon assessment.
4. **Few people who voted for ST3 in 2016 understood WSLE's significant negative impacts.**
- a. Until 2015, Sound Transit's ST3 plans only included a light rail connection to Ballard.

- b. Changing course in 2016, Sound Transit included a short light rail line to West Seattle in ST3. It promised that if voters approved ST3, bus and rapid transit service would be improved, and detailed light rail planning and public outreach would follow.
- c. The ST3 proposal did not mention negative impacts that WSLE would generate on voters' transit experiences, the environment, and losses of homes, businesses and jobs.

5. Puget Sound Regional Council (PSRC) and Sound Transit data show that by 2050, light rail will only carry 3% of all regional trips, and buses only about 5% -- despite PSRC expecting 1.8 million more residents living in the Kitsap-Snohomish-King-Pierce region.

- a. PSRC expects that:
 - i. buses and trains together will carry just 15% of trips In Seattle.
 - ii. most trips in the four-county region will be carried by shared and single occupancy vehicles.
- b. The Metro Transit rationale for supporting WSLE is that transferring passengers onto the four-mile rail line will free buses it can redeploy for more frequent local service.
 - i. Data and experience, including "transfer penalty" and truncated bus routes, do not appear to support this rationale.
 - ii. Metro Transit stated to the West Seattle Transportation Coalition in 2014 that it will cancel a bus route costing more than \$7 per rider (about \$10 in 2024 dollars). The September 2024 WSLE cost estimate of \$6-\$7 billion to serve 27,000 riders, puts its per rider expenditure on its 2032 opening day at \$222,000-\$260,000 per rider (see Economics 3.2.a. below).
 - 1. Using ST estimates of 4 million WSLE riders per year and adding \$40 million per year cost for operations and maintenance, per rider cost may decrease to \$1500 for the first year, and eventually plateau at \$600 per rider in perpetuity.
 - 2. If rail does not replace bus, and per-trip cost from point A to point B is not reduced, then moving riders from bus to rail is not beneficial. If only the rider's trip is measured, without including distance, the result may be misleading. For example:
 - a. Neither Metro Transit nor Sound Transit appear to have made cost-benefit calculations to assess the transit cost effectiveness of WSLE.
 - b. Metro's plan for WSLE to replace four miles of bus corridor means it will deliver \$10 /rider passengers to one station of a \$1500 /rider rail line, then use another \$10 /rider bus to pick up the portion of those riders who don't continue on rail.
 - c. Passengers who ride further on rail may also transfer to bus at the end of their rail segment.
 - iii. Electrification of the Metro bus fleet, and expansion of flexibly routed bus service that would connect riders more efficiently to destinations within and beyond West Seattle, and would yield a far better cost-benefit ratio. It could be funded with a fraction of the \$6-\$7 billion estimated for a single, four-station SODO-WSLE route.

- iv. Improving bus service should also include City of Seattle exercising its municipal authority to eliminate road bottlenecks and give buses more priority in traffic.
6. **The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail study and planning phase.**
- a. ST's WSBLE DEIS outlined non-rail improvements that could be made on West Seattle-Downtown corridor, such as roadway upgrades, and bus, van and other transit additions to increase service.
 - b. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle-SODO-Downtown corridor.
 - c. Presently, public and private roadway buses, vanpools and ride-share services can carry more riders than light rail, often faster and less expensively.
 - d. Unlike fixed rail, routes for non-rail options can be modified as conditions change, because roadways provide transit flexibility and redundancy options that rail cannot.
 - 1. As the Seattle area grows, transit alternatives other than light rail can, and according to PSRC, will provide better rider experiences, including more direct service, shorter wait times, and fewer transfers
 - 2. King County Metro:
 - a. is planning to transition its entire fleet of buses to electric power.
 - b. has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas.
7. **The unique light rail bridge – that has not yet been designed, would extend 1.5 miles from SODO to Pigeon Point at a minimum 100-foot height over the Spokane St. viaduct, SR99, and the Duwamish River. This presents risks of rising expenses and construction delays:**
- a. No passenger railroad bridge of this length and consistent height has ever been built.
 - b. The bridge will run over the [Seattle Fault earthquake and liquefaction zone](#), creating engineering challenges and downstream risks.
 - i. Structural shifting caused by the 2001 Nisqually earthquake contributed to the 2022 failure of the West Seattle high bridge, and its 2-1/2 year closure for repairs. The proposed WSLE bridge follows the same pathway at a generally higher elevation.

Section 3: Economics

- 1. **At the present \$6-\$7 billion estimate, Sound Transit will have spent \$1.1-\$1.3 million per rider to put each passenger on the train for WSLE's opening day** (including construction, interest payment, operations, and maintenance costs).
 - a. Opening day per rider WSLE cost is based on ST's May 12, 2023, email to the Federal Transportation Administration, estimating 5,400 boardings per day between 2032 and 2042, during the 10-year period Metro Transit continues to run its C, H and 21X bus lines

on the West Seattle-Downtown corridor, until the SODO-Downtown segment is complete in 2042.

- i. After Year 1, expecting approximately 194,000 riders per year, per rider cost may drop to \$3107-\$3621 per rider, and by 2042, drop to \$381-\$330 per rider.
 - b. By 2042, it is estimated that Sound Transit will have spent an additional \$2 billion (or possibly more) for the SODO-Downtown segment, including a second tunnel. Metro Transit will terminate Rapid Ride C, H and 21X bus service on the corridor. From that point, Sound Transit estimates WSLE ridership will increase to 27,000 boardings per day. Cost on opening day may thereby drop to \$296,000-\$334,000 per rider, calculating a \$8-\$9 billion total for the complete extension.
 - i. Depending on Sound Transit's amortization schedule for the \$8-\$9 billion total WSLE + Downtown segment construction expenditure, plus interest payments, plus \$40 million estimated annual WSLE operations & maintenance cost, overlaying annual ridership estimates of 4 million, per rider cost may plateau between \$600-\$1500 in perpetuity.
 - c. **In advocating for WSLE rail to replace buses on the 4-mile SODO-WS corridor, Metro Transit is advocating to deliver \$10 per rider passengers to a \$600 to \$1.3 million per rider WSLE train station, for a four-mile ride, to a stop where they may transfer to another \$10 per rider Metro bus.**
 - d. The non-profit Transportation Choices Coalition testified at Sound Transit's September 26, 2024, board meeting that price should be no object. Between Washington's powerful Congressional delegation able to funnel debt-relief capital to Sound Transit, and the perpetual \$1780 minimum per year in Sound Transit taxes that every Pierce, King and Snohomish County household has been paying since 2017, TCC believes money will be perpetually available for light rail projects.
 - e. In 2022, Sound Transit reported a \$12 billion budget shortfall, then recast its accounting to appear \$6 billion in debt. At ST's September 19, 2024, board meeting, ST CEO Goran Sparrman and Deputy CEO of Megaproject Delivery Terri Mestas asserted that the \$6-\$7 billion cost for WSLE can be managed.
 - f. It would appear that, if cost were no object, Sound Transit could spend any amount needed for WSLE, and tunnel from SODO to the east bank of the Duwamish, use an immersed tube or other tunnel to cross beneath the Duwamish, then tunnel from the west bank to the West Seattle Junction, reducing most impacts listed here.
 - i. This project revision would require Sound Transit to generate a separate EIS.
2. **At \$6-\$7 billion (\$1.5 billion-\$1.75 billion per mile) for 4 miles (Seattle Transit Blog), WSLE is the world's second-most expensive urban rail project**, behind NYC's subway upgrade (\$2.8 billion /mile), but ahead of San Francisco's subway (\$920 million /mile)
 - a. The \$6-\$7 billion estimate covers only the SODO-West Seattle light rail segment
 - b. Additional cost will be incurred to build the SODO-Downtown Seattle tunnel link.
3. **WSLE may present revenue losses and opportunity costs for transit across the region (Snohomish, King, and Pierce counties), and for the key light rail city of Seattle.**

- a. While city and county revenues have decreased, Sound Transit will eliminate businesses, services and properties that pay into municipal tax rolls.
 - i. Neither ST, Seattle nor King County has run cost-benefit analyses to judge whether trading a decade's worth of WSLE-caused tax revenue losses for anticipated future revenue will pencil out – given that:
 - 1. Neither ST nor the City of Seattle has calculated what net economic benefits WSLE will create for West Seattle, the CID and SODO, and
 - 2. While light rail creates benefits in some areas, West Seattle commerce and real estate markets up to now have not significantly suffered, even during the pandemic.
- b. Rejecting more economical transit options presents substantial opportunity costs. For the same budgetary outlay, lower cost options could likely manage prospective demand, and deliver more services for more people (See "Overlooked transport project planning process..." **Appendix Item 3.**).
 - i. The study found that the 'do-minimum' option (e.g., buses to serve a corridor vs. more expensive options such as light rail) generates a Ridership to Cost Ratio (RCR) nine times higher than the Locally Preferred Alternative (LPA – light rail in our locality), and the second-best alternative produced an average RCR that was 86% higher than the LPA.
- c. **The FEIS states that WSLE may displace up to 133 businesses, employing 1,230 people. The final number will be uncertain until ST chooses a final WSLE alignment.**
 - i. The business (commercial and service), and job losses will be spread between West Seattle (70-100 businesses, up to 1000 jobs), SODO industrial and Chinatown-International District (CID) areas.
 - ii. The number of businesses displaced will depend on the WSLE preferred alignment finally chose. [West Seattle blogger Marie McKinsey](#) offered this list of possible business displacements in 2022, extending from Jefferson Square (37 closures) to Delridge (West Seattle Athletic Club, Uptown Espresso, Skylark Cafe), to West Marginal Way. As ST focuses more on a preferred alignment, losses will become more clear.
 - iii. Patronage estimates by affected businesses (e.g., 7-11, Taco Time, Starbucks) average 1000 customers per day, with more for larger enterprises (e.g., Trader Joe's, Safeway).
 - iv. Businesses forcibly relocated have low survival rates, particularly in minority and low-to-middle income neighborhoods: 1974 Urban Renewal study: (<https://www.kcdc.org/wp-content/uploads/2022/10/A-Case-Study-of-the-Consequences-of-Displacement-Caused-by-Urban.pdf>). "The non-survival rate was highest among the small eating and drinking, food stores, and miscellaneous retail and services."
 - v. Demographic trends show upscale, primarily White workers moving back to urban centers of employment and commerce, and non-White workers and businesses moving or (immigrants) taking up residence in suburban areas (see "'Great Inversion,'" **Appendix 7**).

1. As these trends continue, it is even less likely minority businesses will be able to successfully relocate, and even less likely the employees of these businesses will find places they can afford to live.
 2. While light rail helps move people to areas of the city where they can recreate and consume, it does not support people who are providing the businesses and jobs for the more metropolitan population.
 - d. Rather than allowing WSLE to create an estimated \$6-\$7 billion in opportunity costs for Seattle and the region, the money could be better invested in other transit options within the WSBL corridor and beyond, yielding a lower carbon footprint, and fewer environmental, social and economic impacts.
4. **Freight, public transit, emergency services and commuters will be disrupted, and productivity impacted for 5-8 years, as West Seattle's main roads north, west and south of the WS High Bridge are blocked during construction.**

Section 4: Local Environment and Global Climate

1. **As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:**
- **attracting new riders, and**
 - **expanding walkable, car-free urbanism near three new West Seattle light rail stations.**
- a. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e) forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6-3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total...").
 1. The restatement is used to extend the mitigation period by at least 50 years – to 2080, or later.
 2. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them.
 3. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period
 4. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit.
 5. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy
 - i. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032.
 - ii. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080.**

- iii. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941 tons.
 - 1. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941 tons per year reduced, yields a payback period of 48 years – until the year 2080, to mitigate WSLE construction carbon.
- b. **The Build option will only reduce car and light truck miles traveled by 0.02%** compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total – Table 4.6-1, “Regional Vehicle Miles Traveled and Average Daily Traffic Change”). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.
- c. **Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes.** This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.
- d. **The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit’s construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 (“An Update on Public Transportation’s Impacts on Greenhouse Gas Emissions.”)**
 - TCRP 226 outlines a “land use effect” of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also “below, and [Appendix 2](#). “Station Development...”)
 - The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2,941 tons generated by the methodology Sound Transit uses in the WSLE FEIS.
 - This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again, to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly.
 - While the DEIS Appendix L4.6 states that “general FTA estimates” have been applied, no federal project the size of WSLE’s 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated.
- e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.
- f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle’s and King County’s goals are to achieve carbon neutrality by 2050.
 - However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won’t be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use.

- As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day.
 - Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not.
- g. **The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated.** Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from [TreePAC.org](https://treepac.org). Those trees would have absorbed an estimated 64,000 tons of carbon a year ([City of Seattle & One tree Planted](#)) – nearly half the carbon output from WSBL construction.
2. **The City of Seattle can ill afford to lose more tree canopy.** Seattle has lost 255 acres of trees since 2017 (acreage cut by Sound Transit within city limits may be included in the Seattle count). Globally [in 2023, forests and other land ecosystems emitted almost as much carbon dioxide as they absorbed](#), due to fires, deforestation, and other factors.
- a. Eliminating acres of forest will exacerbate Seattle’s heat islands, which are worst around light rail stations, areas where the city’s commerce and employment are concentrated, and within its low income and of-color communities. Lower economic areas are more prone to suffer from adverse heat conditions, fewer parks and less tree cover. They are less economically able to afford air conditioning or other means to keep cool.
 - Heat sink areas, King County Executive (& ST Chair) Dow Constantine’s "Three Million Trees Initiative", City of Seattle’s Trees for Neighborhoods program, KC Land Conservation Initiative:
<https://kingcounty.gov/en/legacy/elected/executive/constantine/news/release/2021/june/23-heat-mapping-results> (June 23, 2021)
 - b. The WSLE will eliminate three acres of north Pigeon Point Forest, plus 1-3 more acres of West Seattle green space, and beaver, salmon, heron and other species habitats there and on the Duwamish River and Longfellow Creek.
 - Sound Transit has not calculated costs for man-made elements to replace erosion control, storm water management, oxygen production, carbon sink, shade, and other ecosystem services provided by green infrastructure.
 - c. As Sound Transit runs its modest program to replace trees it has eliminated, and Seattle’s recent \$13 million in federal grants will help fund planting trees in Delridge and the Chinatown International District, the two entities will simply be working back from the deficit ST will cause with WSLE.
 - d. Replacing mature trees with saplings is what Nature does after a natural disaster. Sound Transit is imitating a natural disaster.
3. **Under Washington’s Climate Commitment Act (CCA), Sound Transit’s claimed level of carbon emissions in the FEIS – 146,000 metric tons over five to six years of construction – qualify it as a “large quantity carbon emissions generator” (LQG). The LQG threshold is 25,000 metric tons of carbon per year.**

- a. The best way to avoid emission is not to generate them (see **Minnesota** below).
 - b. The WSBLE DEIS does not address purchases of carbon offsets, or other high-quantity mitigation plans for this massive output.
 - c. The Puget Sound Clean Air Agency's (PSCAA) analysis finds ". the Chinatown International District and Duwamish Valley neighborhoods facing disproportionate air pollution impacts, impacts from WSBLE construction, and more sensitive health outcomes in the form of higher air quality-related hospitalizations."
 - d. PSCAA AQ Director Kathy Strange commented in 2022 on Sound Transit's WSBLE DEIS, that "...transportation emissions will be improved in the long-term because of light rail..." The data prove otherwise.
 - e. Currently, [Minnesota is the only U.S. state holding its agencies accountable to its climate goals](#). A provision in its 2024 transportation law requires both state and municipal transportation planning agencies to take the state's climate goals into account when assessing new projects. **And it provides a guideline Washington State could emulate.**
- 4. Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE.**
- 5. Since the 1980s, federal transportation agencies and transit experts, including former ST CEO Peter Rogoff, have questioned the value of light rail for most urban areas. (See [Appendix 9](#)).**

Section 5: Equity

1. Sound Transit's WSLE proposal does not prioritize equity.

- a. The WSLE will serve the more affluent parts of West Seattle, while travel from less affluent, more diverse areas with more mobility disadvantaged citizens will require more transfers and take longer
- b. A "transfer penalty" will affect riders arriving at stations by bus at ground level. They must either ride or climb multiple levels up or down to reach a train. At the Junction station, walk time may add five minutes to the transfer, and the wait time for the next train may add another 10.
- c. Light rail will not improve access for residents who live in West Seattle's transit deserts (those lacking convenient access to transit within ¼ mile walk).
 - i. Metro buses re-deployed after the 2042 opening of WS-CID service will not deliver residents in West Seattle to new locations of businesses and services that WSLE will have displaced.
 - ii. Building WSLE will instead encourage more use of private vehicles to reach these new business, service and shopping locations.
- d. Elimination of the Frye Business Center and commercial properties to the north and south for construction of the Delridge and Avalon light rail stations will:
 - i. exacerbate the "food desert" of grocery and prepared food providers between North Delridge and California Ave SW, for the area's mixed demographic communities

- ii. eliminate the walkable/15-minute Delridge-Avalon neighborhood, and deprive these communities of gathering places, and medical, social, business and recreational services

2. To make way for light rail, WSLE will eliminate over one hundred houses and apartments.

- a. The full number of residential buildings to be razed cannot be estimated. While Sound Transit's Directors have selected a route, until construction plans and budgets are set, there will be uncertainties. Current documentation indicates that Sound Transit will bulldoze everything from single houses in Delridge to 92 apartments in Jefferson Square. The Executive Summary of the WSLE FEIS indicates that the Preferred Alternative will require displacing 165 to 173 residential properties.
- b. Despite large numbers of new housing units and apartments built in West Seattle since 2014, rent and purchase costs have increased, not decreased. That has pushed out less wealthy residents (see *Seattle Times* May 12, 2024) and increased their needs to travel longer distances for work, shopping and entertainment, most often by car. Many have moved to other cities.
- c. Transit-oriented development (TOD -- dense housing, such as apartments, multiplexes, and ADUs) has been built along the Delridge, Avalon and East Junction bus routes of Rapid Ride H and C, and 21 and 128. Sound Transit will bulldoze a significant portion of existing bus-served TOD for the rail line, and not replace it for up to 10 years, further depriving West Seattle of affordable housing, while wasting public resources.

3. The Sound Transit Board has the authority to choose the No Build option for WSLE.

- a. Under Section 2 of the ST3 package that voters approved in 2016, the board must reconsider projects that are infeasible, unaffordable and/or unbuildable. WSLE is all three.
- b. Contrary to what regional and city leaders are saying, the WSBLE and WSLE light rail proposals can be re-considered, and better transit options can be chosen – under the No Build option
- c. No Build is a legitimate, legal, and responsible choice, which is included, under federal and state law, in all environmental reviews of large, disruptive transit construction projects. Based on the findings of the environmental process through this date, project sponsors should adopt the No Build option.
- d. The No Build option for WSLE will only affect the West Seattle corridor:
 - i. other ST3 projects could continue to be studied and implemented, as they are subject to a separate environmental process, and
 - ii. Sound Transit will still be able to get [Federal Capital Investment Grants](#) for non-light rail transit, and for expansion of high-capacity fixed-route bus transit.

4. Since no Modal Alternatives Analysis (MAA) was ever done, the environmental process and analysis for this project are flawed. This makes the Sound Transit board's choice of light rail questionable.

- 1. The decision to use light rail, rather than other, lower-carbon, less expensive, disruptive and destructive alternatives, was made prior to EIS analysis. Generally, an alternatives

- analysis is required to assure that the best and second-best options are considered, especially when benefit-to-cost ratios vary significantly across the alternatives.
2. Sound Transit and partner agencies conducted an MAA analysis to justify selecting Stride BRT for the I-405 corridor. The 2014 modal analysis for the Downtown Seattle to West Seattle corridor, however ([South King County HCT Corridor Study](#)) was completed with ST2 funding, and aimed at justifying extension of the ST3 light rail program to the exclusion of all other modes.
 - a. This ten-year-old, pre-ST3 work does not present an up-to-date, objective modal alternatives analysis. It did not weigh all potential BRT features and characteristics, or justify more than \$7 billion expenditure for a four-mile light rail line, with massive, adverse construction impacts.
 - b. ST's 2024 FEIS forecast that WSLE light rail would attract an additional 2,000 transit riders per day in the 2040s, presents an insignificant level of customer growth for a \$7 billion public outlay. Until Sound Transit completes an objective environmental process, that compares all reasonable modal alternatives for this corridor, further development of high-capacity transit should be put on hold.
 3. In not listing any modal alternatives to light rail, the FEIS bases its rationale on funding, not comparative analysis:
 - a. **"The [West Seattle light rail extension] project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016.** The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode identified for this corridor was light rail." [Comment response 4 on citizen comment 0672 in Appendix O of the WSLE FEIS]
 - b. Page 6.2 of the FEIS explains further that alternative bus modes were not considered: "A purpose of the project, as identified in Chapter 1, "Purpose and Need for West Seattle and Ballard Link Extensions," is to provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan. **The mode (bus) was considered in the Level 1 analysis but was not carried forward since it was not identified and analyzed in the Sound Transit 3 Plan.**"

Concluding Summary:

1. The Downtown-West Seattle (WSLE) light rail line should not be built (No Build option). Within the No Build option, the Ballard-Downtown segment should also be reconsidered.
2. Sound Transit's WSLE presents more disadvantages than advantages, including overwhelmingly negative social, economic and environmental impacts. As such, it fails to satisfy basic criteria set forth by ST3 and its FEIS for improving corridor transit. The costs, and negative environmental, economic and residential impacts of WSLE outweigh the benefits of building it
3. Current transit modes carry more passengers now, without transfers and wait times, than light rail promises to carry when completed. WSLE will degrade rather than improve the ridership experience.
4. The 146,000 tons of carbon that WSLE construction will generate – reduced from 614,000 tons in the Draft EIS -- plus elimination of and damage to acres of carbon absorbing forest and habitat, will be more than what a short light rail line can mitigate through year 2105.

5. Choosing the light rail investment over more flexible, effective and cheaper transit modes presents significant opportunity costs for the City of Seattle, and the regional transit network.
6. Sound Transit can achieve better ridership by continuing to expand and electrify King County Metro and ST Regional Express bus services, on the West Seattle peninsula, W. Seattle-Downtown corridor, and beyond.

Any Sound Transit taxing district resident opposed to the construction of the West Seattle light rail extension has three paths of action:

1. Use emailtheboard@soundtransit.org to contact all board members. As 17 of its 18 members are elected officials, and accountable to voters, [each can be contacted directly](#) by their own constituents.
 - The Seattle members include City Council Member [Daniel Strauss](#), Mayor [Bruce Harrell](#), Council Member [Rob Saka](#) **, ST Board Chair [Dow Constantine](#) **, and King County Council Member [Girmay Zahilay](#). (** indicates lives in West Seattle). City Council Member Rob Saka chairs the City Council's Transportation Committee. [King County Council Member Teresa Mosqueda](#) also lives in West Seattle.
 - Include specific information from this document in messages to officials
 - Contact board and council members by letter, phone and email, and urge (or demand) that they:
 - Stand up for businesses, jobs, housing, communities, and the environment in Seattle.
 - Call for adopting the **No Build Option** still listed in both the 2024 WSLE FEIS and the 2022 WSBLE DEIS.
 - Require Sound Transit to consider cheaper, less destructive, lower carbon transit options than rail for the Downtown-West Seattle corridor.
 - Support using other modes, including buses, bus rapid transit, and other transit service connections to the regional rail network
2. Contact Port of Seattle Commissioners [Fred Felleman](#), [Ryan Calkins](#), [Toshiko Hasegawa](#), and [Hamdi Mohamed](#), Regional Transportation Manager [Geraldine Poor](#), Chief of Staff [Aaron Pritchard](#), and management staff [LeeAnne Schirato](#), [Kathy Roeder](#) and [Sabrina Bolieu](#).
 - Ask them to object vigorously and officially to impacts the WSLE bridge will cause, and remind them of what the Port of Seattle has opposed – obstruction of the East and West Duwamish waterways, impairment of maritime traffic and businesses, damage to the Duwamish River and Longfellow Creek ecosystems, and a huge carbon footprint.
3. Email local business organizations that will be affected:
 - * [West Seattle Chamber of Commerce](#)
 - * [West Seattle Junction Association](#)

Appendix

Additional Considerations from Research Literature

1. Consumer willingness to fund light rail development decreases as cost increases

[Economists at the Federal Reserve Bank of St Louis](#) showed that when consumers understand the actual costs of getting light-rail services, the amount is generally more than they are willing to pay.

Nationwide, annual light-rail operating costs (\$778.3 million) far exceed fare revenue (\$226.1 million). The balance (\$552.2 million) is paid for with tax dollars. Examples (see also Snohomish-King-Pierce below): Fare revenues cover only 28.2% of system operating costs for St. Louis, 19.4% for Baltimore and 21.4% for Buffalo. If construction costs are added, losses become so large, no light-rail system can possibly recoup its costs.

Based solely on dollar cost, economists at the Federal Reserve Bank of St. Louis suggest that annual light-rail subsidies in St. Louis could instead be used more efficiently to buy a hybrid Toyota Prius every five years and pay annual maintenance costs of \$6,000 for 7,700 low-income transit riders – with minimal pollution increases, and only a 0.5 percent increase in traffic congestion. Funds would still be left for all other MetroLink riders to pay for ride-share and bus fares.

Houston: When [Houston Metro proposed the Purple line in 2008](#), it estimated a \$591 million cost, and 28,750 weekday riders. By September 2020, costs reached \$822 million, with daily expected ridership decreased to 5,230, meaning a per rider cost of about \$150,000 to build the Purple Line.

Snohomish-King-Pierce Counties:

1. [Sound Transit revenues do not cover its operating expenses](#)
 - a. Sound Transit farebox revenues in 2023 covered only 16% of Link light rail operating costs (lower than the 40% minimum policy threshold), 9% of ST Express bus operating costs (below the 20% threshold), and 7% of Sounder costs (below the 23% threshold).
 - b. Revenue vs. cost gaps widen more when construction costs are added. Examples:
 - i. Adding together operations, maintenance and construction costs, light rail fare revenues cover less than 3%.
 - ii. For Sounder North commuter rail, ST over-estimated ridership by 90%, and underestimated total costs vs. farebox revenue by 95%.
 - c. As regional revenues will never cover or recoup its full costs, Sound Transit must add millions of dollars in federal grants and borrowed money to cover them.

2. Three factors drive excessive U.S. transit project costs

As Sound Transit cost overruns have become chronic, the [New York experience provides a cautionary tale](#) about how to structure transit projects, and how to avoid pitfalls.

Factors that add approximately 85% to costs include extra money going to red tape, wasted contingencies, paying workers during delays, defensive design, and profit. Specific factors include:

- Lack of design standardization: this leads to fewer economies of scale, the inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process.

- Labor: 40-60% of the project's hard costs in the U.S. Labor costs in low-cost cases: Turkey, Italy, and Sweden are in the 19-30% range; Sweden, the highest-wage case among them, is 23%.
- U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher.

3. Selection of urban transit alternatives shows bias toward light rail over alternative modes, even when rail serves fewer riders at higher cost.

"The overlooked transport project planning process — What happens before selecting the Locally Preferred Alternative?" by [Yadi Wang](#) & [David Levinson](#), in [Transportation Research Interdisciplinary Perspectives, Volume 19](#), May 2023, 100809 //

<https://www.sciencedirect.com/science/article/pii/S2590198223000568>

Analyzing 43 U.S. light rail projects, the study found that on average, the 'do-minimum' option generates a Ridership to Cost Ratio (RCR) nine times higher than the Locally Preferred Alternative (LPA), and the average RCR produced by the second-best alternative is 86% higher than that of the LPA, indicating **substantial opportunity costs of rejecting more economical courses of action**, which could have likely managed prospective demand at much lower costs and delivered more services for more people at the same budgetary outlay.

Yet, transit agencies and officials only compared the preferred light rail mode against the traditional bus mode in the Transportation Systems Management (TSM) base option, indicating selection bias and discrimination in early-stage appraisal and decision-making.

4. Station development does not generally benefit low-income transit users

A [2019 University of Houston study](#) finds mixed effects on the welfare of neighborhoods after light rail construction. Researchers estimated an \$11,000 average increase in median income for neighborhoods near the new rail line development; but most gains go to high-income neighborhoods, while low-income neighborhoods see their income decline. The observed income polarization may be explained by poverty magnet and gentrification effects occurring simultaneously across the treated neighborhoods.

Light Rail Transit (LRT) does not appear to consistently deliver on its progressive policy goals of alleviating labor-skill mismatch, creating time cost savings, and increasing income mobility.

5. Light rail development does not reduce congestion

[Los Angeles: While light rail investments may increase transit accessibility and ridership within high-demand corridors, it does not reduce congestion.](#)

6. Per Capita Transit Ridership Is Declining

[Since 2013, U.S. transit ridership has declined, despite continued growth in population.](#)

Ridership has peaked and decreased seven different times since 1980, but overall, transit ridership per capita has decreased by nearly 15%. Researchers are evaluating economic considerations, fuel price, changing modal choices, and other areas as possible causes for the decline.

Demographic trends help to explain declining transit usage:

- a. The U.S. [population is aging](#). While young age cohorts have a higher propensity for transit use, they represent a lower share of the population.
- b. Simultaneously, significant population declines in some of the counties with high-quality transit service and use is being mirrored by population growth in counties with lower levels of transit service and use. Rapidly growing counties had half the rate of commuting to work by transit as did rapidly declining counties.
- c. [Over 90% of U.S. population growth in 2023 occurred outside of its 124 largest cities](#). Among the 124 cities that the U.S. Census Bureau reports with populations over 200,000, about a third have lost population except 14 over 200,000 populations cities in Texas, and nine in Florida. Medium-sized cities in Florida, the Carolinas, and Las Vegas suburbs also added to the population. Americans are presently trading dense, urban, transit-oriented cities for less expensive, more spacious living elsewhere. How this will play out in transit development and politics are key questions.

7. The Great Inversion: socio-economic status and race re-sort urban-suburban residency

Suburbia increasingly sorted on bases of socio-economic status and race ([Nijman, 2020](#); [Nijman & Clery, 2015](#)). As suburbs continue growing:

- a. based on economic affordability ([Kolko, 2017](#)),
- b. central-cities appear to revive and renew growth, as city as “the office,” especially for growing numbers of self-employed and freelancers, in the new urban, knowledge transfer and networking economy, that thrives in a high density and high circulation environment ([Carlino, 2015](#); [Kloosterman, 2020](#); [Scott, 2017](#)).

Cities and city centers as preeminent sites of consumption, consumer services, and amenities: [Glaeser, Kolko, and Saiz \(2000\)](#). Also, rise of cities as sites of *consumption* ([Jayne, 2005](#))

Significance of actual vs. relative numbers of workers, types of workers, incomes, and vulnerabilities of ‘gig economy’ and ‘sharing/platform economy’: ([Graham, Hjorth, & Ledonvirta, 2017](#); [Davidson & Infranca, 2016](#); [Shambaugh, Nunn, & Bauer, 2018](#)).

8. Public transit is losing its customer base

During the pandemic, people formed new mobility habits, and most are not returning to regular use of urban buses and trains. In a 2022 survey of 38 transit agencies worldwide, researchers found a 10% loss in the transit customer base, as reported by the [International Association of Public Transit](#).

As of spring 2024, Sound Transit has not yet consistently reached its original 2010 light rail ridership target to the University District, even including the extension to Northgate, according to the U.S. Federal Transit Administration’s National Transit Database (NTD). ST’s original goal was an average of 2.7 million boardings per month. It has touched that level in a few months since 2018, such as for the Taylor Swift events in SODO. But it has not reached this ridership level on average in 2024. Across all central Puget Sound transit agencies, NTD reports transit ridership as of April 2024 was 30% lower than in pre-pandemic 2019.

9. Federal transit agencies and experts have questioned the value of urban light since the mid-1980s:

[Ken Orski, Urban Mobility Corp. transportation management consultant](#), quoted in mid-1986:
“Mass transportation is the way the other fellow is supposed to get to work.”

Sam Zimmerman, USDOT Urban Grants Manager, quoted in June, 1986 (Zimmerman helped Approve Seattle's 3rd Ave tunnel project):

- “No city is a paradigm. Good transit solutions are showing up differently in different locations. Transit agency people are ... *involved in selling a product that is obsolete for the emerging market.* (emphasis added). The traditional transit market is relatively small, not growing, and travels mainly downtown, which is where buses and trains do the best job.”

Rick Setner, UMTA Deputy Director (now FTA), quoted at Washington, DC, in June 1986:

- Determining cost effectiveness and overall cost per hour of user benefit is a complex formula. It reckons all costs (capital, interest, operations, maintenance), divided by hours of benefit — including travel time savings to existing & new riders, plus net additional new riders.
- Transit agencies want benefit hours to increase, to make the most benefit for most people. Moving people from bus to rail is not beneficial if:
 - rail doesn't replace bus, and
 - the agency is just measuring per-trip cost of a single trip from point A to point B, without including full trip distance. The result may be misleading.
- Light rail is not flexible; it's the equivalent of a Maginot Line (see France post-World War 1). Each NYC line in 1938 carried more than all three subway lines do now — because population has shifted to suburbs.

Alan Pisarski, author of [Commuting in America](#), quoted in June 1986:

- “A low density, highly dispersed market without substantive corridors is not something traditional transit can respond to. One of the great games is defining the notion of what comprises “transit.” It gets broader every year. Today, it's basically everything that is not an individual car: HOV lanes (Shirley Highway HOV lane, VA, is America's busiest transportation corridor outside NYC), taxis, car & van pools.”
- “Many city officials look at light rail as a panacea: it's new, glitzy, and makes them a “world class” city. In some cities it's appropriate, in many more, it has very limited application, or it is not appropriate at all, because it's cost prohibitive.”
 - “If you have six miles to do, it makes no sense to build six miles of tunnel, and/or lay six miles of track and wire. Instead of looking to be “world class” (a PR purpose), look to move people around (transit purpose).”
- “Traditional transit service is suburb to downtown office. Suburban 1980s jobs grew three times more than downtown areas, creating a dispersed pattern of commuter travel, which cannot be easily and conveniently served. It's the reason why there's so much traffic congestion: we're more dependent on cars.”
- As of the mid-1980s:
 - Only 6-8% of employees working in station-based office developments use rail to commute to work. Up to 94% use SOVs (single occupancy vehicles). While rail stimulates development, it will create more traffic congestion than before, not reduce congestion.
 - Rail transit successfully stimulates development around suburban rail stations, but only plays a modest role in serving people who work in station-based offices.

- Building new rail lines may actually have the perverse effect of exacerbating congestion & inequity (see **3. and 4.** above).

USDOT Undersecretary Peter Rogoff, May 18, 2010, addressing Federal Reserve Bank of Boston, MA (Rogoff is former Sound Transit CEO)

- Financial difficulties facing mass transit networks are partially due to an “unnecessary focus” on rail expansion over bus improvements. Using the flexibility of buses, “you can move a lot of people at very little cost compared to rail.”
- “Paint is cheap, rails [sic] systems are extremely expensive”. He further stated, “...paint a designated bus lane on the street system. Throw in signal preemption, and you can move a lot of people at very little cost compared to rail.”

UMTA 1995 COMPARISON OF SELECTED RAIL SYSTEM COSTS, RIDERSHIPS ^

	<u>LENGTH</u>	<u>COST</u>		<u>AVG. RIDERS PER DAY</u>	
	<u>miles</u>	<u>estmt'd.</u>	<u>actual</u>	<u>estmt'd.</u>	<u>actual</u>
Buffalo, NY	6.4	\$336M	\$536M	184,000 (1995)	35,000
Baltimore	14.0	\$450M	\$990M	206,000 (1980)	55,000*/**
Wash., DC	70	\$2.5B	\$10B	800,000 (1990)	500,000**
Portland, OR	15	\$143M	\$214M	42,500 (1995)	20,000
Sacramento	18	\$136M	\$196M	20,000 (1990)	13,000
San Francisco	71	\$700M	\$1.7B	255,000 (1975)	200,000**
San Diego	20	\$***	\$258M	12,000 (1981)	30,000
Atlanta	32	\$1.37B	\$2.9B	578,000 (1995)	195,000**
Miami, FL	20	\$795M	\$1.05B	202,000 (1995)	36,000**

M = million / B = billion

Atlanta & Washington figures assume full system in place

* Baltimore did not open until 1984

** Indicates heavy rail system. Systems are generally funded with 75% federal, 25% local money.

*** San Diego had no federal funding for its first 15.9-mile line

^ Source: Urban Mass Transit Administration

10. [City of Seattle critique of ST3 DEIS](#) (quote of excerpts):

- Sound Transit is considering cost savings refinements in response to its 2021 ST3 Realignment. Some of these proposed strategies are drastic.
 - We discourage scope reductions that do not bring commensurate benefit to the system and its riders, and that are not consistent with what was committed to voters.
 - We do not support strategies that would reduce access to the system.
- The City supports studying refinements that help control costs and provide meaningful benefits to local communities and the broader transit system and its riders, including:
 - Mix-and-match refinements for flexibility to choose segment alternatives that provide greatest benefit or fewest impacts;

- Refinements to stations that would improve safe, non-motorized access;
- Refinements that would avoid, minimize, or mitigate adverse project impacts.

11. Pandemic-caused vacancy rate increases in downtown areas

Between April 2019 and January 2023, [Seattle had the second-highest downtown commercial vacancy rate in the U.S. \(14.2%\)](#). [“Seattle's office vacancy rate reached 23.2% in July 2024](#), according to [a recent report by Commercial Edge Research](#), highlighting the city's struggle to adapt to post-pandemic market conditions,”

While Metro Transit ridership in 2024 has recovered to 75% of pre-COVID levels, full ridership recovery is questionable as work from home + hybrid structures continue, and central employment and commerce locations diversify from downtown Seattle.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Key environmental findings from our research include research omissions and absences of data by Sound Transit in several areas:</p> <ul style="list-style-type: none"> No Modal Alternatives Analysis conducted, making choice of light rail to serve the West Seattle-Downtown Seattle corridor questionable. Carbon calculations and reductions are not transparent, mitigation strategy takes 50-80 years to effect \$1.3 million cost per rider on WSLE opening day (5400 riders, \$7 billion cost) Opportunity costs not calculated: 10 year's loss of business and property tax revenues for Seattle and King County, degrading of transit service and ridership, degrading of community equity, irreparable environmental damage, no budget calculation for man-made elements to replace erosion control, storm water management, oxygen production, carbon sink, shade, and other ecosystem services <p>Destruction of forest canopy and habitat will exacerbate heat islands, and lose natural carbon absorbing resources</p>	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension. The purpose of the West Seattle Link Extension includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> Provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan. Connect regional centers as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's Regional Transit Long-Range Plan (2014). Implement a system that is technically and financially feasible to build, operate, and maintain. <p>Refer to Section 4.6, Air Quality, and Section 4.10, Energy Impacts, of the West Seattle Link Extension Final EIS for updated air quality and energy analyses. As described in Section 4.6.6.1.2, Construction Emissions, construction emissions were calculated using Federal Transit Administration's (FTA's) Transit Greenhouse Gas Estimator V3.0. Printouts of the results from this estimator are available in Appendix L4.6E, Greenhouse Gas Analysis. Section 4.6.6.1.2 also discusses the emerging nature of this field of analysis and provides additional context for interpreting these results.</p> <p>Refer to Appendix L4.6E for more information on the greenhouse gas emissions modeling.</p> <p>Refer to the West Seattle Link Extension Final EIS for a full discussion of the environmental impacts of the build and no build alternatives for each environmental resource.</p>
2	<p>The environmental process and analysis for this project is also flawed by Sound Transit never having conducted a Modal Alternatives Analysis or Major Investment Analysis.</p> <p>This analysis would have informed the decisions that Sound Transit's Board made in choosing high-capacity transportation (HCT) mode(s) for the Downtown-SODO-West Seattle corridor. Items the analysis would have likely revealed:</p>	<p>Consistent with the State Environmental Protection Act (SEPA), the West Seattle Link Extension Final EIS provides the public and decision makers with information about the West Seattle Link Extension "at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified" (Washington Administrative Code [WAC] 197-11-055(2)). This is also consistent with</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>1. light rail is less cost effective on a per rider basis than bus and bus rapid transit (BRT). With no evidence of Sound Transit conducting this analysis, it has failed the board, and called the board's choice of light rail into question (See Section 5, Item 4 for details).</p> <p>2. Bus alternatives could be deployed to serve the corridor for less than \$1 billion, and would most likely attract more transit riders than the additional 2000 that Sound Transit's FEIS predicts will ride WSLE by 2042 (see Section 2, Ridership 2.d. below).</p>	<p>the National Environmental Policy Act (NEPA), which provides that "Agencies shall integrate the NEPA process with other planning at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts" (40 Code of Federal Regulations 1501.2).</p> <p>Refer to response to comment 1 regarding the decision to select light rail as the mode for the West Seattle Link Extension.</p>
3	<p>Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE. With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension does not satisfy the ST3 and DEIS criteria and should not be built. Expert evaluation of the environmental record shows that:</p> <ul style="list-style-type: none"> • WSLE transit times and therefore ridership will degrade West Seattle transit service, not improve it after the WSLE and Ballard LE open in 2032 and 2042 respectively • The construction-generated carbon will be more than passenger loads on WSLE trains and TOD land use effects can mitigate over five future decades of WSLE operation. • Acres of forest and habitat will be eliminated, and much more of it irreparably damaged • Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network: • Economic development in West Seattle will be set back for at least a decade • Equity, community-building and social justice will be set back at least a decade, • -- raising the question, based upon the newest, September 2024 WSLE cost estimate: "How can six to seven billion dollars be better spent to improve public transit?" 	<p>Your opposition to the West Seattle Link Extension has been noted.</p>
4	<p>Lower carbon, less expensive and less destructive public transit options than WSLE have been studied by Sound Transit, are available and serving West Seattle riders better now than rail will in the future, including but not limited to:</p> <ul style="list-style-type: none"> d. Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane e. Add north and south Busway exits from east end of West Seattle Bridge 	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<ul style="list-style-type: none"> f. Add to exclusive bus lanes in West Seattle g. Complete Metro Transit initiative to electrify bus fleet 	
5	<p>1. The WSLE light rail plan will not improve transit or rider experience on the Downtown- West Seattle corridor. It will make them worse.</p> <ul style="list-style-type: none"> d. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though it may take longer if traffic is heavy. e. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see "transfer penalty" in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer. f. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers. <p>2. Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.</p> <ul style="list-style-type: none"> e. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment. f. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences) iii. The FEIS sorts ridership forecasts based on several options: <ul style="list-style-type: none"> d) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built e) Two station scenario, without Avalon station f) Three station scenario with Delridge, Avalon and Junction stations iv. Appendix 2 of Sound Transit's Transportation Technical Report shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares. g. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day. h. The Final EIS on page 3-2 states, "The addition of the West Seattle Link Extension to the regional 	<p>Chapter 3, Transportation Environment and Consequences, of the Final EIS provides ridership forecasts and travel times.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>transit system would result in about 2,000 net new daily transit trips by 2042.”</p> <p>This number is:</p> <ul style="list-style-type: none"> i. not mentioned in the FEIS Executive Summary and is not otherwise publicized by Sound Transit on its website or in any other documents, ii. contradicted by ST’s 5/12/23 email to FTA. <p>e. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.</p> <p>i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix 6., “Per Capita Transit Ridership Is Declining”).</p>	
6	<p>The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase..</p> <ul style="list-style-type: none"> c. ST’s WSBLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service. d. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle corridor e. Presently, public and private roadway buses, vanpools and ride-share services can be programmed to carry more riders than light rail, often faster and less expensively. f. Unlike fixed rail, routes for non-rail options can be modified as conditions change, because roadways provide transit flexibility and redundancy options that rail cannot. <ul style="list-style-type: none"> 1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers 2. King County Metro: <ul style="list-style-type: none"> a) is planning to transition its entire fleet of buses to electric power. b) has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas. 	<p>Refer to response to comment 3 regarding mode selection for the West Seattle Link Extension. A list of bus route service changes for each of the Build Alternatives is provided in Section 3.3.2, Build Alternatives, of Appendix N.1, Transportation Technical Report of this West Seattle Link Extension Final EIS. Bus service assumptions for both the No Build Alternative and Build Alternatives were developed by King County Metro Transit (Metro) and Sound Transit as part of Appendix B, Transit Service Integration Technical Memorandum, of Attachment N.1A, Transportation Technical Analysis Methodology, in Appendix N.1. Bus service would be restructured to integrate with the project, which would result in removing or truncating some lines but generally replacing them with reliable, high-frequency light rail service. The bus service hours savings from removing or truncating routes would be redeployed elsewhere in accordance with Metro’s service guidelines. The 2042 Build Alternatives assume there will be changes to bus service in the West Seattle Link Extension project corridor to integrate with the new light rail line. The service changes are based on Metro Connects and coordination with Metro regarding this project.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
7	<p>As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:</p> <ul style="list-style-type: none"> • attracting new riders, and • expanding walkable, car-free urbanism near three new West Seattle light rail stations. <p>g. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e) forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6- 3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total...").</p> <p>6. The restatement is used to extend the mitigation period by at least 50 years-to 2080, or later.</p> <p>7. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them.</p> <p>8. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period</p> <p>9. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit.</p> <p>10. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy</p> <p>iv. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032.</p> <p>v. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080. **</p> <p>vi. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reductio of 2,941tons.</p> <p>2. Dividing the re-calculated, annualized 140,952 construction tons generated by</p>	<p>Refer to Section 4.6, Air Quality, and Section 4.10, Energy Impacts, of the West Seattle Link Extension Final EIS for air quality and energy analyses. As described in Section 4.6.6.1.2, Construction Emissions, construction emissions were calculated using FTA's Transit Greenhouse Gas Estimator V3.0. . Printouts of the results from this estimator are available in Appendix L4.6E, Greenhouse Gas Analysis. Section 4.6.6.1.2 also discusses the emerging nature of this field of analysis and provides additional context for interpreting these results.</p> <p>Refer to Appendix L4.6E for more information on the greenhouse gas emissions modeling.</p> <p>For more information on Sound Transit's environmental policy and sustainability initiatives, please visit Sound Transit's website at https://www.soundtransit.org/get-to-know-us/environment-sustainability.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>2,941 tons per year reduced, yields a payback period of 48 years - until the year 2080, to mitigate WSLE construction carbon.</p> <p>h. The Build option will only reduce car and light truck miles traveled by 0.02% compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total -Table 4.6-1, "Regional Vehicle Miles Traveled and Average Daily Traffic Change"). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.</p> <p>i. Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes. This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.</p> <p>j. The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.")</p> <ul style="list-style-type: none"> • TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...") • The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2.941 tons generated by the methodology Sound Transit uses in the WSLE FEIS. • This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly. • While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile,-160 	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>foot-tall, elevated light rail bridge has ever been built or fully calculated.</p> <p>k. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.</p> <p>l. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's and King County's goals are to achieve carbon neutrality by 2050.</p> <ul style="list-style-type: none">• However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use.• As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day.• Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not. <p>m. The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated. Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from TreePAC.org. Those trees would have absorbed an estimated 64,000 tons of carbon a year (City of Seattle & One tree Planted)- nearly half the carbon output from WSBLE construction.</p>	

From: [Littauer, Erin \(FTA\)](#)
To: [Littauer, Erin \(FTA\)](#)
Subject: WSLE Comments- Delay Issuing Sound Transit WSLE light rail Record of Decision
Date: Wednesday, November 27, 2024 9:24:41 AM

From: Marilyn Kennell <mkennell@gmail.com>
Sent: Friday, November 22, 2024 9:26 AM
To: DOT Exec Sec (OST) <DOTExecSec@dot.gov>
Cc: Fletcher, Susan (FTA) <susan.fletcher@dot.gov>
Subject: Delay Issuing Sound Transit WSLE light rail Record of Decision

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Secretary Pete,

Sound Transit's Final EIS disclosed that the 4-mile West Seattle light rail cost estimate is now over \$7 billion. Under Section 2 of the ST3 package, the board **must** reconsider infeasible, unaffordable, and unbuildable projects. At 2 billion dollars per mile, this project is "**unaffordable**."

We, Rethink the Link and Smarter Transit, object to this spending and to how greatly and negatively WSLE light rail will impact West Seattle's economy, environment, services, and social fabric. Poorer neighborhoods will suffer disproportionately. Even if Sound Transit were to push out the timeline and find the needed funding, WSLE light rail has more disadvantages than advantages.

Our EIS-C <https://rethinkthelink.org/home/our-alternative-final-environmental-impact-statement-eis-c> has viable, cost-effective solutions that Sound Transit should have given due consideration in the final EIS. We request that the FTA delay issuing a Record of Decision until Sound Transit Board members have time to seriously consider (1) robust enhancement of Bus Rapid Transit and (2) the NO BUILD option.

Snohomish County and Pierce County taxpayers have been paying for and waiting for light rail for many years. Sound Transit should concentrate on

moving people more efficiently along the north-south corridor instead of spending \$7 billion on the West Seattle stub, which will only take us to SODO in ten years.

Marilyn Kennell
4022 32nd Avenue SW
Seattle, WA 98126

mkennell@gmail.com

(425)280-3538

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Sound Transit's Final EIS disclosed that the 4-mile West Seattle light rail cost estimate is now over \$7 billion. Under Section 2 of the ST3 package, the board must reconsider infeasible, unaffordable, and unbuildable projects. At 2 billion dollars per mile, this project is "unaffordable."</p> <p>We, Rethink the Link and Smarter Transit, object to this spending and to how greatly and negatively WSLE light rail will impact West Seattle's economy, environment, services, and social fabric. Poorer neighborhoods will suffer disproportionately. Even if Sound Transit were to push out the timeline and find the needed funding, WSLE light rail has more disadvantages than advantages.</p> <p>Our EIS-C https://rethinkthelink.org/home/our-alternative-final-environmental-impact-statement-eis-c has viable, cost-effective solutions that Sound Transit should have given due consideration in the final EIS. We request that the FTA delay issuing a Record of Decision until Sound Transit Board members have time to seriously consider (1) robust enhancement of Bus Rapid Transit and (2) the NO BUILD option. Snohomish County and Pierce County taxpayers have been paying for and waiting for light rail for many years. Sound Transit should concentrate on moving people more efficiently along the north-south corridor instead of spending \$7 billion on the West Seattle stub, which will only take us to SODO in ten years.</p>	<p>Your opposition to the West Seattle Link Extension and support for the No Build Alternative has been noted.</p> <p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>

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From: [Marie McKinsey](#)
To: [DOT Exec Sec \(OST\)](#)
Cc: [Fletcher, Susan \(FTA\)](#); [Assam, Mark \(FTA\)](#)
Subject: Sound Transit Light Rail Extension to West Seattle, Washington
Date: Sunday, December 15, 2024 5:09:58 PM

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello Secretary Pete,

I know that your chapter as the Secretary of Transportation is coming to a close, and I am sad about that. I have appreciated your clear-eyed leadership these four years.

I imagine you have heard of Sound Transit's light rail expansion plans for Washington State. The final Environmental Impact Statement for the West Seattle portion was presented in October. As I understand it, officials from the federal government now need to review it and offer input on where we go from here. Which is why I am writing.

I am a West Seattle resident and blogger. I am alarmed by the amount of destruction this project will cause to businesses, homes, and sensitive wildlife habitat. In exchange, it appears that we get little to no benefit. Here are three blog posts I have written over the past couple of years on the subject. I hope they will give you a citizen's perspective.

1) When the Draft Environmental Impact Statement came out in April of 2022, I wondered which businesses in our community would be affected. I knew that, by law, Sound Transit was required to give us that information. But it was not easy to find. I spent a lot of time looking through the DEIS to find the addresses. I finally found them buried in Appendix L. However, Appendix L didn't give business names, only addresses of properties.

A couple of friends of mine and I took on the task of Googling the addresses of businesses we thought might be in the path of the project. Then we checked the Sound Transit address list to see if we could find them. From there, we came up with names of businesses that could be lost, and I wrote this blog post.

<https://www.whereiamnow.net/post/how-many-west-seattle-businesses-will-we-lose-because-of-sound-transit-light-rail>

This post was published before the DEIS comment period was over. It created a furor in the neighborhood. I believe a lot of people submitted comments on the DEIS after reading it.

2) Proponents of the project insist that since voters approved the project, it has to be built. There can be no other option. However, for all aspects of the project, Sound Transit was required to offer a "No Build" option, which estimates what will happen by 2042 if the project isn't built. As I understand it, that option is just as valid as the "build" options. In spite of protests to the contrary, Sound Transit's studies indicate that the project is not a good use of taxpayer's money.

<https://www.whereiamnow.net/post/sound-transit-presents-an-excellent-case-for-the-no-build-option>

3) Finally, after talking to West Seattle residents who live in different parts of the neighborhood, and hearing their complaints about transit service, I decided to do an audit of what we have. I wanted to look beyond my Alki Beach neighborhood (a bit of a transit desert) to see what works, what doesn't, who is left out, and what we need to improve transportation here on the peninsula. This is my report.

<https://www.whereiamnow.net/post/here-s-why-west-seattle-needs-a-comprehensive-transit-plan>

(I feel like this study should have been done by one of the local transportation agencies and used as a starting point for discussions in the neighborhood about ways to improve transit.)

The West Seattle Link Extension that voters approved years ago was supposed to cost around \$1.7 billion - a lot of money to travel just 4 miles, a route already covered by a segment of the Metro 50 bus route. In October, when Sound Transit confirmed their "approved alternative," which again duplicates the same route as the bus, the estimated cost had ballooned to \$7 billion.

I believe we have officially entered into the boondoggle phase of the project.

<https://westseattleblog.com/?s=sound+transit>

If the No Build option is adopted, a portion of the taxes raised to pay for light rail can be legally channeled into other forms of transit that will actually improve transportation on the peninsula. Those improvements can be implemented relatively quickly. Instead, I'm afraid all we'll get is a mangled neighborhood and a train that no one needs.

Thank you for your attention. Please let me know if you have any questions.

Best regards,

Marie McKinsey
2434 55th Ave SW
Apt. B
Seattle, WA 98116

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The West Seattle Link Extension that voters approved years ago was supposed to cost around \$1.7 billion - a lot of money to travel just 4 miles, a route already covered by a segment of the Metro 50 bus route. In October, when Sound Transit confirmed their "approved alternative, which again duplicates the same route as the bus, the estimated cost had ballooned to \$7 billion.</p> <p>I believe we have officially entered into the boondoggle phase of the project.</p> <p>https://westseattleblog.com/?s=sound+transit</p> <p>If the No Build option is adopted, a portion of the taxes raised to pay for light rail can be legally channeled into other forms of transit that will actually improve transportation on the peninsula. Those improvements can be implemented relatively quickly. Instead, I'm afraid all we'll get is a mangled neighborhood and a train that no one needs.</p>	<p>Your opposition the West Seattle Link Extension and support of the No Build Alternative has been noted.</p> <p>On Oct. 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a workplan to improve the agency's financial situation and to inform a financially sound project to be baselined</p>

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Sound Transit Projects

I-85 Sandra Braun

Details	Communication
#559492	From: Sandra L Braun <slbraun13@me.com> Sent: Wednesday, January 29, 2025 5:49 PM To: Gamboa, Josephine <josephine.gamboa@soundtransit.org> Subject: Sound Transit Light Rail - Disaster - Seattle, WA
Date Recieved: 2/3/2025	
Created by: Maddie Dewhirst	Dear Josephine Gamboa, I attended a West Seattle, King County, WA State, Community Transit/Light Rail Forum on Saturday January 25th. It is unreal what I learned about the proposal by Sound Transit (ST), the impact statement and understanding that we the people, did not vote for, now 9 years later, what is proposed. And, there was no study for better options.
Audience:	
Type of Draft	I'm sorry no one from Sound Transit attended, having been invited.
EIS comment:	
Reach:	Much of the news was alarming but some statements stood out:
Participation:	
Engagement:	<ol style="list-style-type: none">1. The environmental impact is a disaster! The environmental study is lost in the appendix and ST gives little concern.2. The Debt/Service - interest on loans was not figured in the equation of cost.3. The cost was stated at 1.9 Billion/per mile for 4 miles. The use estimate was 5400/day. Ridiculous if estimates are accurate.4. The locations marginalize the already marginalized. There would be multiple transfer for people to get to the main transit locations. This eats away at more travel time and cost. Also, the line does not connect people, as initially proposed, for easy access to additional down town transit.5. No Metro improvements until the light rail is completed!!!6. Concrete for the building will come from the plant under the bridge! Construction results in TONS of air polluting carbon.7. What if transit breaks down? No replacement funds, therefore a permanent tax? If shut down for repairs, the per day cost is crazy expensive and is not something the tax base can cover.8. Both Snohomish and Pierce counties voted this down.9. West Seattle is going to go through, I believe, a major war with traffic issues.
Source: Email	
Assigned division: Outreach	
Category:	
Project Phase: Planning	
Project Segment: West Seattle and Ballard: West Seattle	The more I list, the more I could go on. The hardest to stomach, is that Sound Transit is not listening. Secondly, it was stated that politics are playing hard in this issue. What must done and allowed, is a full review of Sound Transits proposal. How do we get to that?
Environmental phase:	I find the Sound Transit line preposterous! Thank you for your time. I pray there is action. West Seattle resident, Sandra Braun West Seattle Resident King County Seattle, WA

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Much of the news was alarming but some statements stood out:</p> <ol style="list-style-type: none"> 1. The environmental impact is a disaster! The environmental study is lost in the appendix and ST gives little concern. 2. The Debt/Service - interest on loans was not figured in the equation of cost. 3. The cost was stated at 1.9 Billion/per mile for 4 miles. The use estimate was 5400/day. <p>Ridiculous if estimates are accurate.</p> <ol style="list-style-type: none"> 4. The locations marginalize the already marginalized. There would be multiple transfer for people to get to the main transit locations. This eats away at more travel time and cost. Also, the line does not connect people, as initially proposed, for easy access to additional down town transit. 5. No Metro improvements until the light rail is completed!!! 6. Concrete for the building will come from the plant under the bridge! Construction results in TONS of air polluting carbon. 7. What if transit breaks down? No replacement funds, therefore a permanent tax? If shut down for repairs, the per day cost is crazy expensive and is not something the tax base can cover. 8. Both Snohomish and Pierce counties voted this down. 9. West Seattle is going to go through, I believe, a major war with traffic issues. 	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p> <p>Transit riders headed to Downtown Seattle from south of the study area would transfer from bus transit to light rail. King County Metro Transit's (Metro's) RapidRide H Line would provide a transfer to light rail at the Delridge Station for residents in Highland Park and White Center, and residents in High Point would likely transfer from multiple Metro bus routes to light rail at the Avalon Station or Alaska Junction Station. Refer to Appendix G, Environmental Justice, for information on impacts and benefits to low-income populations and communities of color. Section 3.1.4, Environmental Justice Populations.</p> <p>Bus service assumptions for both the No Build Alternative and Build Alternatives were developed by King County Metro Transit (Metro) and Sound Transit as part of Appendix B, Transit Service Integration Technical Memorandum, of Attachment N.1A, Transportation Technical Analysis Methodology, of Appendix N.1. Bus service would be restructured to integrate with the project, which would result in removing or truncating some lines but generally replacing them with reliable, high frequency light rail service.</p> <p>Refer to Section 4.6, Air Quality, and Section 4.10, Energy Impacts, of the West Seattle Link Extension Final EIS for air quality and energy analyses. As described in Section 4.6.6.1.2, Construction Emissions, construction emissions were calculated using Federal Transit Administration's (FTA's) Transit Greenhouse Gas Estimator V3.0. Printouts of the results from this estimator are available in Appendix L4.6E, Greenhouse Gas Analysis. Section 4.6.6.1.2 also discusses the emerging nature of this field of analysis and provides additional context for interpreting these results.</p> <p>Refer to Appendix L4.6E for more information on the greenhouse gas emissions modeling.</p>

Sound Transit Projects

I-86 Donna Popich

Details	Communication
#559491	From: Donna Popich <donna@popich4@gmail.com>
Date Recieved: 1/30/2025	Sent: Thursday, January 30, 2025 5:12 AM To: Somers, Dave J <Dave.Somers@co.snohomish.wa.us> Subject: WSLE and Light Rail Projects
Created by: Maddie Dewhirst	Dear Mr. Somers,
Audience:	The current West Seattle Light Rail project is a far cry from what voters approved in 2016. Back then, we were promised an efficient, well-integrated transit system that would seamlessly connect neighborhoods to the downtown core without excessive disruption or skyrocketing costs. Little did we know that these were simply empty promises not backed by feasibility, environmental, or logistical studies.
Type of Draft EIS comment:	Today, the project has been plagued by delays, ballooning budgets, (1.9 billion per mile and growing), and proposals that threaten to disrupt our established community with this flawed route. Instead of delivering on its original vision, this project has become an example of politics, broken promises, and poor planning, leaving residents to realize that this is not the future of transit that they were promised and that they supported.
Reach:	
Participation:	Local residents are acutely aware of ST3's issues, which include but are not limited to, escalating costs, delays, challenges with the route and design, inequities, resident/business displacements, deceptions, redundancy with our current bus service, and permanent damage to the environment, and we have lost trust in WSLE and in the ST Board. This lack of trust will be further demonstrated with our votes.
Engagement:	
Source: Email	It is a highly ill-conceived notion if any member(s) or the former chair of the ST Board think that they will be hanging their legacies on the light rail projects in Western Washington.
Assigned division: Outreach	Please consider more cost-effective, timely, and less environmentally and community destructive options, including improved bus routes and electric buses. Then maybe Snohomish County can finally get the light rail its citizens have been promised and have been paying for, for years.
Category:	
Project Phase: Planning	Thank you for your attention to this matter.
Project Segment: West Seattle and Ballard: West Seattle	donna popich 4042 38th Ave SW Seattle, WA 98126 206-371-9003
Environmental phase:	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Today, the project has been plagued by delays, ballooning budgets, (1.9 billion per mile and growing), and proposals that threaten to disrupt our established community with this flawed route. Instead of delivering on its original vision, this project has become an example of politics, broken promises, and poor planning, leaving residents to realize that this is not the future of transit that they were promised and that they supported.</p> <p>Local residents are acutely aware of ST3's issues, which include but are not limited to, escalating costs, delays, challenges with the route and design, inequities, resident/business displacements, deceptions, redundancy with our current bus service, and permanent damage to the environment, and we have lost trust in WSLE and in the ST Board. This lack of trust will be further demonstrated with our votes.</p> <p>Please consider more cost-effective, timely, and less environmentally and community destructive options, including improved bus routes and electric buses.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p> <p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>

Sound Transit Projects

I-87 Kirsten Whittlemore

Details	Communication
#559493 Date Recieved: 1/30/2025 Created by: Maddie Dewhirst Audience: Type of Draft EIS comment: Reach: Participation: Engagement: Source: Email Assigned division: Outreach Category: Project Phase: Planning Project Segment: West Seattle and Ballard: West Seattle Environmental phase:	<p>From: Kirsten Whittlemore <kirstenwhittlemore@outlook.com> Sent: Thursday, January 30, 2025 2:04 PM To: Gamboa, Josephine <josephine.gamboa@soundtransit.org> Cc: Kirsten Whittlemore <kirstenwhittlemore@outlook.com> Subject: Citizen Input for the West Seattle Light Rail Record of Decision</p> <p>Dear Ms. Gamboa –</p> <p>Please route this email and attachments within Sound Transit, including to Board members. Thank you.</p> <p>Dear Sound Transit, including all Board Members –</p> <p>I am writing to you with a request that you carefully examine the current Sound Transit West Seattle Light Rail Extension Environmental Impact Statement (attachment 1) and the alternative EIS that was drafted by Rethink the Link (attachment 2), and exert your influence to stop the Sound Transit project in favor of an alternative, less costly, plan. Below are summary points of well researched and verified impacts that the current plan would have (specific details and data on each can be found in the Rethink the Link EIS).</p> <ul style="list-style-type: none"> • Negative Impact on Transit Times and Ridership: WSLE will degrade transit service, increasing travel times and requiring multiple transfers, which will negatively impact rider experience and reduce ridership efficiency. • High Carbon Emissions from Construction: The construction of WSLE will generate significant carbon emissions (140,952 metric tons), which will take decades to mitigate, making it environmentally unsustainable. • Destruction of Forest and Habitat: WSLE will eliminate acres of forest and habitat, causing irreparable environmental damage and exacerbating urban heat islands, particularly affecting low-income and minority communities. • Economic and Social Setbacks: The project will set back economic development, equity, and community-building efforts in West Seattle and the Chinatown-International District for at least a decade. • High Costs and Financial Burden: The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects, with questionable financial sustainability. • Displacement of Businesses and Residents: WSLE will displace over 100 houses and apartments and at least 70 businesses, leading to job losses and further economic disruption in affected communities. • Lack of Voter Awareness and Misinformation: Many voters were unaware of the significant negative impacts of WSLE when they approved ST3 in 2016, including environmental damage and increased costs. • Inefficiency Compared to Current Transit Modes: Current bus and rapid transit services are more efficient, carrying more passengers with lower carbon footprints and fewer environmental impacts than the proposed light rail. • Legal and Responsible No Build Option: The Sound Transit Board has the authority to choose the No Build option, which is a legitimate and responsible choice under federal and state law and would avoid the negative impacts of WSLE. • Better Alternatives Available: Lower carbon, less expensive, and less destructive public transit options, such as bus lane expansions and electrification of the bus fleet, are available and could serve West Seattle riders more effectively than WSLE. <p>Sincerely, Kirsten Whittlemore 3715 41st Ave SW / 206-227-8740</p>

West Seattle Light Rail Environmental Impact Statement-Conclusion (EIS-C)

Citizen Comment for Entry into the WSLE Record of Decision With FTA Response Respectfully Requested

An independent assessment of the environmental impact
of the Sound Transit West Seattle-Link Extension (WSLE) light rail proposal

Submitted by Rethink The Link (RTTL) and Regional Transit Colleagues

Revision 5.1 November 14, 2024 | Replaces earlier versions

Hot linked documents should be considered as attached to this document.

Comments or Questions? Contact RTTL at contact@rethinkthelink.org

Section 1: Executive Summary

The Ballard-Downtown-West Seattle light rail discussion started from the premise that roadway-based modes could not handle peak period passenger demand in that corridor. Thus, in 2016, Sound Transit presented a West Seattle-Ballard link extension (WSBLE) light rail proposal in its ST3 transportation package. It offered simple criteria for voters to consider:

- improve public transit,
- encourage economic development, equity, community-building and social justice,
- protect the environment.

Sound Transit's January 2022 WSBLE Draft Environmental Impact Statement (DEIS) was designed to show that:

- the simple criteria outlined in ST3 would be satisfied, and
- WSBLE's proposed advantages would outweigh its disadvantages.

In the 2016 ST3 package, and the 2022 Draft EIS, the West Seattle and Ballard light rail segments were combined into one project routed through downtown Seattle. As changes to the Ballard portion required additional work, Sound Transit and the USDOT Federal Transit Administration (FTA) separated Ballard into its own project, and moved forward with a discrete West Seattle (WSLE) environmental review process. WSLE has been separated again into West Seattle-SODO and SODO-downtown segments, and ST has now initiated a new EIS review process for the Ballard-downtown portion.

Independent transit experts present their findings here, based on:

- researching and analyzing information from the West Seattle sections of the 2022 WSBLE DEIS, public comments submitted about the DEIS, and the Final EIS (FEIS) released September 20, 2024,
- related transit studies and historical records, (see [Appendix](#) of this document), and
- comments to Sound Transit's Board of Directors after their selection of a WSLE trackway route on October 24, 2024.

With Sound Transit estimating a \$6.5-\$7.1 billion cost for WSLE alone, funding for the Ballard project's estimated \$12 billion cost could be delayed or even canceled. This stems from Sound Transit

historically underestimating costs, over-estimating ridership, delaying projects, and now approaching its debt ceiling horizon in the next few years.

Given these circumstances, Sound Transit cannot confirm when and whether WSLE may tie into the larger light rail network. In the FEIS, it forecasts 27,000 daily riders on WSLE, but it will not deliver that many until 2042, when the SODO-downtown tunnel segment is completed – requiring additional funds and creating additional impacts. Between 2032 (expected WSLE delivery date) and 2042, King County Metro will continue running its West Seattle-downtown buses. This led ST to inform the FTA (by email 5/12/23) that expected WSLE ridership will be 5400 per day for the 2032-2042 period.

Thus, WSLE will not deliver on claims summarized in FEIS ES.2.3, that it “is expected to reduce dependency on single-occupancy vehicles, slow down growth in vehicle miles traveled, conserve energy, and reduce greenhouse gas emissions.” It will not “reduce daily vehicle miles traveled by approximately 17,000 by 2042, helping to achieve Washington state’s greenhouse gas emissions goals.”

The environmental process and analysis for this project is also flawed by Sound Transit never having conducted a Modal Alternatives Analysis or Major Investment Analysis.

This analysis would have informed the decisions that Sound Transit’s Board made in choosing high-capacity transportation (HCT) mode(s) for the Downtown-SODO-West Seattle corridor. Items the analysis would have likely revealed:

1. light rail is less cost effective on a per rider basis than bus and bus rapid transit (BRT). With no evidence of Sound Transit conducting this analysis, it has failed the board, and called the board’s choice of light rail into question (See **Section 5, Item 4** for details).
2. Bus alternatives could be deployed to serve the corridor for less than \$1 billion, and would most likely attract more transit riders than the additional 2000 that Sound Transit’s FEIS predicts will ride WSLE by 2042 (see Section 2, Ridership 2.d. below).

Sound Transit’s environmental review process has revealed more disadvantages than advantages with the WSLE. With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension does not satisfy the ST3 and DEIS criteria and should not be built. Expert evaluation of the environmental record shows that:

- WSLE transit times and therefore ridership will degrade West Seattle transit service, not improve it after the WSLE and Ballard LE open in 2032 and 2042 respectively
- The construction-generated carbon will be more than passenger loads on WSLE trains and TOD land use effects can mitigate over five future decades of WSLE operation.
- Acres of forest and habitat will be eliminated, and much more of it irreparably damaged
- Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network:
 - Economic development in West Seattle will be set back for at least a decade
 - Equity, community-building and social justice will be set back at least a decade,
 - -- raising the question, based upon the newest, September 2024 WSLE cost estimate: “How can six to seven billion dollars be better spent to improve public transit?”

The Sound Transit Board can and should choose the No Build option for the WSLE.

- [Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016](#), allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.
- ST Executive Corridor Director Cahill Ridge's told the November 2017 West Seattle Transportation Coalition public meeting that ST "has no Plan B" for WSLE if financial, disruptive technology or other factors arise. He was incorrect. ST has several Plan B options available.
- Lower carbon, less expensive and less disruptive and destructive public transit options than WSLE have been studied by Sound Transit, are available now, and serving West Seattle riders better than rail will in the future. Options include, but are not limited to:
 - a. Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane
 - b. Add north and south Busway exits from east end of West Seattle Bridge
 - c. Add to exclusive bus lanes in West Seattle
 - d. Complete the Metro Transit initiative to electrify its bus fleet
- No Build is a legitimate, legal, and responsible choice, included under federal and state law in all environmental reviews of large, disruptive transit construction projects. ST3 project sponsors can and should consider this option and should note that the facts overall point to selection of No Build.

This document addresses the West Seattle link extension specifically, and the WSLE generally. It contributes summary information to the decision-making processes for:

- local and state government officials who regulate and influence Sound Transit decision making, and
- citizens who pay significant taxes (see "revenues vs. costs" below) to fund Sound Transit, in the expectation that their government will provide improved mobility services.
- government decision makers who have to decide what the WSLE Record of Decision (ROD) will finally state as the result of the environmental process for WSLE.

Section 2: Current Transit Ridership and Forecasts for West Seattle-Downtown Corridor, and Region

1. **The WSLE light rail plan will not improve transit or rider experience on the Downtown-West Seattle corridor. It will make them worse.**
 - a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though it may take longer if traffic is heavy.
 - b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfer times in West Seattle and SODO (see "transfer penalty" in [Equity 1.b](#) below). Traffic may still be a factor causing bus rides to take longer.
 - c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers.
2. **Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.**
 - a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to

approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.

- b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)
 - i. The FEIS sorts ridership forecasts based on several options:
 - (a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built
 - (b) Two station scenario, without Avalon station
 - (c) Three station scenario with Delridge, Avalon and Junction stations
 - ii. Appendix 2 of [Sound Transit's Transportation Technical Report](#) shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.
 - c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro Transit, whose 2020 West Seattle-Downtown corridor count was 27,000 riders per day.
 - d. The Final EIS on page 3-2 states, "The addition of the West Seattle Link Extension to the regional transit system would result in about 2,000 net new daily transit trips by 2042." This number is:
 - i. not mentioned in the FEIS Executive Summary and is not otherwise publicized by Sound Transit on its website or in any other documents,
 - ii. contradicted by ST's 5/12/23 email to FTA.
 - e. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.
 - i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see **Appendix 6., "Per Capita Transit Ridership Is Declining"**).
3. [Sound Transit is not building what voters approved](#) as ST3 in 2016:
- Voters are getting a different rail plan than Sound Transit presented as ST3 in 2016:
- i. The original Ballard-West Seattle line (WSBLE) is now two separate lines – BLE and WSLE
 - ii. **The \$1.7 billion ST3 budget for WSLE is now \$6-\$7 billion.** Listed Rapid Ride corridor improvements have not been made, and WSLE's 2030 delivery date will not be met.
 - iii. The ST3 proposal did not describe Pigeon Point deforestation, "irreparable" habitat damage, or give any notice of a large carbon footprint from construction as documented in earlier Sound Transit projects.
 - iv. Additional carbon and pollution generated from 5-8 years of traffic congestion is not specified in the DEIS but may be tallied in SDOT's (Seattle Dept. of Transportation) annual carbon assessment.
4. **Few people who voted for ST3 in 2016 understood WSLE's significant negative impacts.**
- a. Until 2015, Sound Transit's ST3 plans only included a light rail connection to Ballard.

- b. Changing course in 2016, Sound Transit included a short light rail line to West Seattle in ST3. It promised that if voters approved ST3, bus and rapid transit service would be improved, and detailed light rail planning and public outreach would follow.
- c. The ST3 proposal did not mention negative impacts that WSLE would generate on voters' transit experiences, the environment, and losses of homes, businesses and jobs.

5. Puget Sound Regional Council (PSRC) and Sound Transit data show that by 2050, light rail will only carry 3% of all regional trips, and buses only about 5% -- despite PSRC expecting 1.8 million more residents living in the Kitsap-Snohomish-King-Pierce region.

- a. PSRC expects that:
 - i. buses and trains together will carry just 15% of trips In Seattle.
 - ii. most trips in the four-county region will be carried by shared and single occupancy vehicles.
- b. The Metro Transit rationale for supporting WSLE is that transferring passengers onto the four-mile rail line will free buses it can redeploy for more frequent local service.
 - i. Data and experience, including "transfer penalty" and truncated bus routes, do not appear to support this rationale.
 - ii. Metro Transit stated to the West Seattle Transportation Coalition in 2014 that it will cancel a bus route costing more than \$7 per rider (about \$10 in 2024 dollars). The September 2024 WSLE cost estimate of \$6-\$7 billion to serve 27,000 riders, puts its per rider expenditure on its 2032 opening day at \$222,000-\$260,000 per rider (see Economics 3.2.a. below).
 - 1. Using ST estimates of 4 million WSLE riders per year and adding \$40 million per year cost for operations and maintenance, per rider cost may decrease to \$1500 for the first year, and eventually plateau at \$600 per rider in perpetuity.
 - 2. If rail does not replace bus, and per-trip cost from point A to point B is not reduced, then moving riders from bus to rail is not beneficial. If only the rider's trip is measured, without including distance, the result may be misleading. For example:
 - a. Neither Metro Transit nor Sound Transit appear to have made cost-benefit calculations to assess the transit cost effectiveness of WSLE.
 - b. Metro's plan for WSLE to replace four miles of bus corridor means it will deliver \$10 /rider passengers to one station of a \$1500 /rider rail line, then use another \$10 /rider bus to pick up the portion of those riders who don't continue on rail.
 - c. Passengers who ride further on rail may also transfer to bus at the end of their rail segment.
 - iii. Electrification of the Metro bus fleet, and expansion of flexibly routed bus service that would connect riders more efficiently to destinations within and beyond West Seattle, and would yield a far better cost-benefit ratio. It could be funded with a fraction of the \$6-\$7 billion estimated for a single, four-station SODO-WSLE route.

- iv. Improving bus service should also include City of Seattle exercising its municipal authority to eliminate road bottlenecks and give buses more priority in traffic.
6. **The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail study and planning phase.**
- a. ST's WSBLE DEIS outlined non-rail improvements that could be made on West Seattle-Downtown corridor, such as roadway upgrades, and bus, van and other transit additions to increase service.
 - b. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle-SODO-Downtown corridor.
 - c. Presently, public and private roadway buses, vanpools and ride-share services can carry more riders than light rail, often faster and less expensively.
 - d. Unlike fixed rail, routes for non-rail options can be modified as conditions change, because roadways provide transit flexibility and redundancy options that rail cannot.
 - 1. As the Seattle area grows, transit alternatives other than light rail can, and according to PSRC, will provide better rider experiences, including more direct service, shorter wait times, and fewer transfers
 - 2. King County Metro:
 - a. is planning to transition its entire fleet of buses to electric power.
 - b. has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas.
7. **The unique light rail bridge – that has not yet been designed, would extend 1.5 miles from SODO to Pigeon Point at a minimum 100-foot height over the Spokane St. viaduct, SR99, and the Duwamish River. This presents risks of rising expenses and construction delays:**
- a. No passenger railroad bridge of this length and consistent height has ever been built.
 - b. The bridge will run over the [Seattle Fault earthquake and liquefaction zone](#), creating engineering challenges and downstream risks.
 - i. Structural shifting caused by the 2001 Nisqually earthquake contributed to the 2022 failure of the West Seattle high bridge, and its 2-1/2 year closure for repairs. The proposed WSLE bridge follows the same pathway at a generally higher elevation.

Section 3: Economics

- 1. **At the present \$6-\$7 billion estimate, Sound Transit will have spent \$1.1-\$1.3 million per rider to put each passenger on the train for WSLE's opening day** (including construction, interest payment, operations, and maintenance costs).
 - a. Opening day per rider WSLE cost is based on ST's May 12, 2023, email to the Federal Transportation Administration, estimating 5,400 boardings per day between 2032 and 2042, during the 10-year period Metro Transit continues to run its C, H and 21X bus lines

on the West Seattle-Downtown corridor, until the SODO-Downtown segment is complete in 2042.

- i. After Year 1, expecting approximately 194,000 riders per year, per rider cost may drop to \$3107-\$3621 per rider, and by 2042, drop to \$381-\$330 per rider.
 - b. By 2042, it is estimated that Sound Transit will have spent an additional \$2 billion (or possibly more) for the SODO-Downtown segment, including a second tunnel. Metro Transit will terminate Rapid Ride C, H and 21X bus service on the corridor. From that point, Sound Transit estimates WSLE ridership will increase to 27,000 boardings per day. Cost on opening day may thereby drop to \$296,000-\$334,000 per rider, calculating a \$8-\$9 billion total for the complete extension.
 - i. Depending on Sound Transit's amortization schedule for the \$8-\$9 billion total WSLE + Downtown segment construction expenditure, plus interest payments, plus \$40 million estimated annual WSLE operations & maintenance cost, overlaying annual ridership estimates of 4 million, per rider cost may plateau between \$600-\$1500 in perpetuity.
 - c. **In advocating for WSLE rail to replace buses on the 4-mile SODO-WS corridor, Metro Transit is advocating to deliver \$10 per rider passengers to a \$600 to \$1.3 million per rider WSLE train station, for a four-mile ride, to a stop where they may transfer to another \$10 per rider Metro bus.**
 - d. The non-profit Transportation Choices Coalition testified at Sound Transit's September 26, 2024, board meeting that price should be no object. Between Washington's powerful Congressional delegation able to funnel debt-relief capital to Sound Transit, and the perpetual \$1780 minimum per year in Sound Transit taxes that every Pierce, King and Snohomish County household has been paying since 2017, TCC believes money will be perpetually available for light rail projects.
 - e. In 2022, Sound Transit reported a \$12 billion budget shortfall, then recast its accounting to appear \$6 billion in debt. At ST's September 19, 2024, board meeting, ST CEO Goran Sparrman and Deputy CEO of Megaproject Delivery Terri Mestas asserted that the \$6-\$7 billion cost for WSLE can be managed.
 - f. It would appear that, if cost were no object, Sound Transit could spend any amount needed for WSLE, and tunnel from SODO to the east bank of the Duwamish, use an immersed tube or other tunnel to cross beneath the Duwamish, then tunnel from the west bank to the West Seattle Junction, reducing most impacts listed here.
 - i. This project revision would require Sound Transit to generate a separate EIS.
2. **At \$6-\$7 billion (\$1.5 billion-\$1.75 billion per mile) for 4 miles (Seattle Transit Blog), WSLE is the world's second-most expensive urban rail project, behind NYC's subway upgrade (\$2.8 billion /mile), but ahead of San Francisco's subway (\$920 million /mile)**
 - a. The \$6-\$7 billion estimate covers only the SODO-West Seattle light rail segment
 - b. Additional cost will be incurred to build the SODO-Downtown Seattle tunnel link.
 3. **WSLE may present revenue losses and opportunity costs for transit across the region (Snohomish, King, and Pierce counties), and for the key light rail city of Seattle.**

- a. While city and county revenues have decreased, Sound Transit will eliminate businesses, services and properties that pay into municipal tax rolls.
 - i. Neither ST, Seattle nor King County has run cost-benefit analyses to judge whether trading a decade's worth of WSLE-caused tax revenue losses for anticipated future revenue will pencil out – given that:
 - 1. Neither ST nor the City of Seattle has calculated what net economic benefits WSLE will create for West Seattle, the CID and SODO, and
 - 2. While light rail creates benefits in some areas, West Seattle commerce and real estate markets up to now have not significantly suffered, even during the pandemic.
- b. Rejecting more economical transit options presents substantial opportunity costs. For the same budgetary outlay, lower cost options could likely manage prospective demand, and deliver more services for more people (See "Overlooked transport project planning process..." **Appendix Item 3.**).
 - i. The study found that the 'do-minimum' option (e.g., buses to serve a corridor vs. more expensive options such as light rail) generates a Ridership to Cost Ratio (RCR) nine times higher than the Locally Preferred Alternative (LPA – light rail in our locality), and the second-best alternative produced an average RCR that was 86% higher than the LPA.
- c. **The FEIS states that WSLE may displace up to 133 businesses, employing 1,230 people. The final number will be uncertain until ST chooses a final WSLE alignment.**
 - i. The business (commercial and service), and job losses will be spread between West Seattle (70-100 businesses, up to 1000 jobs), SODO industrial and Chinatown-International District (CID) areas.
 - ii. The number of businesses displaced will depend on the WSLE preferred alignment finally chose. [West Seattle blogger Marie McKinsey](#) offered this list of possible business displacements in 2022, extending from Jefferson Square (37 closures) to Delridge (West Seattle Athletic Club, Uptown Espresso, Skylark Cafe), to West Marginal Way. As ST focuses more on a preferred alignment, losses will become more clear.
 - iii. Patronage estimates by affected businesses (e.g., 7-11, Taco Time, Starbucks) average 1000 customers per day, with more for larger enterprises (e.g., Trader Joe's, Safeway).
 - iv. Businesses forcibly relocated have low survival rates, particularly in minority and low-to-middle income neighborhoods: 1974 Urban Renewal study: (<https://www.kcdc.org/wp-content/uploads/2022/10/A-Case-Study-of-the-Consequences-of-Displacement-Caused-by-Urban.pdf>). "The non-survival rate was highest among the small eating and drinking, food stores, and miscellaneous retail and services."
 - v. Demographic trends show upscale, primarily White workers moving back to urban centers of employment and commerce, and non-White workers and businesses moving or (immigrants) taking up residence in suburban areas (see "'Great Inversion,'" **Appendix 7**).

1. As these trends continue, it is even less likely minority businesses will be able to successfully relocate, and even less likely the employees of these businesses will find places they can afford to live.
 2. While light rail helps move people to areas of the city where they can recreate and consume, it does not support people who are providing the businesses and jobs for the more metropolitan population.
 - d. Rather than allowing WSLE to create an estimated \$6-\$7 billion in opportunity costs for Seattle and the region, the money could be better invested in other transit options within the WSBL corridor and beyond, yielding a lower carbon footprint, and fewer environmental, social and economic impacts.
4. **Freight, public transit, emergency services and commuters will be disrupted, and productivity impacted for 5-8 years, as West Seattle's main roads north, west and south of the WS High Bridge are blocked during construction.**

Section 4: Local Environment and Global Climate

1. **As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:**
- **attracting new riders, and**
 - **expanding walkable, car-free urbanism near three new West Seattle light rail stations.**
 - a. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e) forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6-3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total...").
 1. The restatement is used to extend the mitigation period by at least 50 years – to 2080, or later.
 2. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them.
 3. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period
 4. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit.
 5. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy
 - i. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032.
 - ii. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080.**

- iii. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941 tons.
 - 1. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941 tons per year reduced, yields a payback period of 48 years – until the year 2080, to mitigate WSLE construction carbon.
- b. **The Build option will only reduce car and light truck miles traveled by 0.02%** compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total – Table 4.6-1, “Regional Vehicle Miles Traveled and Average Daily Traffic Change”). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.
- c. **Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes.** This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.
- d. **The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit’s construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 (“An Update on Public Transportation’s Impacts on Greenhouse Gas Emissions.”)**
 - TCRP 226 outlines a “land use effect” of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also “below, and [Appendix 2](#). “Station Development...”)
 - The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2,941 tons generated by the methodology Sound Transit uses in the WSLE FEIS.
 - This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again, to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly.
 - While the DEIS Appendix L4.6 states that “general FTA estimates” have been applied, no federal project the size of WSLE’s 2+ mile, 160 foot-tall, elevated light rail bridge has ever been built or fully calculated.
- e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.
- f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle’s and King County’s goals are to achieve carbon neutrality by 2050.
 - However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won’t be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use.

- As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day.
 - Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not.
 - g. **The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated.** Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from [TreePAC.org](https://treepac.org). Those trees would have absorbed an estimated 64,000 tons of carbon a year ([City of Seattle](#) & [One tree Planted](#)) – nearly half the carbon output from WSBL construction.
2. **The City of Seattle can ill afford to lose more tree canopy.** Seattle has lost 255 acres of trees since 2017 (acreage cut by Sound Transit within city limits may be included in the Seattle count). Globally [in 2023, forests and other land ecosystems emitted almost as much carbon dioxide as they absorbed](#), due to fires, deforestation, and other factors.
- a. Eliminating acres of forest will exacerbate Seattle’s heat islands, which are worst around light rail stations, areas where the city’s commerce and employment are concentrated, and within its low income and of-color communities. Lower economic areas are more prone to suffer from adverse heat conditions, fewer parks and less tree cover. They are less economically able to afford air conditioning or other means to keep cool.
 - Heat sink areas, King County Executive (& ST Chair) Dow Constantine’s “Three Million Trees Initiative”, City of Seattle’s Trees for Neighborhoods program, KC Land Conservation Initiative:
<https://kingcounty.gov/en/legacy/elected/executive/constantine/news/release/2021/june/23-heat-mapping-results> (June 23, 2021)
 - b. The WSLE will eliminate three acres of north Pigeon Point Forest, plus 1-3 more acres of West Seattle green space, and beaver, salmon, heron and other species habitats there and on the Duwamish River and Longfellow Creek.
 - Sound Transit has not calculated costs for man-made elements to replace erosion control, storm water management, oxygen production, carbon sink, shade, and other ecosystem services provided by green infrastructure.
 - c. As Sound Transit runs its modest program to replace trees it has eliminated, and Seattle’s recent \$13 million in federal grants will help fund planting trees in Delridge and the Chinatown International District, the two entities will simply be working back from the deficit ST will cause with WSLE.
 - d. Replacing mature trees with saplings is what Nature does after a natural disaster. Sound Transit is imitating a natural disaster.
3. **Under Washington’s Climate Commitment Act (CCA), Sound Transit’s claimed level of carbon emissions in the FEIS – 146,000 metric tons over five to six years of construction – qualify it as a “large quantity carbon emissions generator” (LQG). The LQG threshold is 25,000 metric tons of carbon per year.**

- a. The best way to avoid emission is not to generate them (see **Minnesota** below).
 - b. The WSBLE DEIS does not address purchases of carbon offsets, or other high-quantity mitigation plans for this massive output.
 - c. The Puget Sound Clean Air Agency's (PSCAA) analysis finds ". the Chinatown International District and Duwamish Valley neighborhoods facing disproportionate air pollution impacts, impacts from WSBLE construction, and more sensitive health outcomes in the form of higher air quality-related hospitalizations."
 - d. PSCAA AQ Director Kathy Strange commented in 2022 on Sound Transit's WSBLE DEIS, that "...transportation emissions will be improved in the long-term because of light rail..." The data prove otherwise.
 - e. Currently, [Minnesota is the only U.S. state holding its agencies accountable to its climate goals](#). A provision in its 2024 transportation law requires both state and municipal transportation planning agencies to take the state's climate goals into account when assessing new projects. **And it provides a guideline Washington State could emulate.**
- 4. Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE.**
- 5. Since the 1980s, federal transportation agencies and transit experts, including former ST CEO Peter Rogoff, have questioned the value of light rail for most urban areas. (See [Appendix 9](#)).**

Section 5: Equity

1. Sound Transit's WSLE proposal does not prioritize equity.

- a. The WSLE will serve the more affluent parts of West Seattle, while travel from less affluent, more diverse areas with more mobility disadvantaged citizens will require more transfers and take longer
- b. A "transfer penalty" will affect riders arriving at stations by bus at ground level. They must either ride or climb multiple levels up or down to reach a train. At the Junction station, walk time may add five minutes to the transfer, and the wait time for the next train may add another 10.
- c. Light rail will not improve access for residents who live in West Seattle's transit deserts (those lacking convenient access to transit within ¼ mile walk).
 - i. Metro buses re-deployed after the 2042 opening of WS-CID service will not deliver residents in West Seattle to new locations of businesses and services that WSLE will have displaced.
 - ii. Building WSLE will instead encourage more use of private vehicles to reach these new business, service and shopping locations.
- d. Elimination of the Frye Business Center and commercial properties to the north and south for construction of the Delridge and Avalon light rail stations will:
 - i. exacerbate the "food desert" of grocery and prepared food providers between North Delridge and California Ave SW, for the area's mixed demographic communities

- ii. eliminate the walkable/15-minute Delridge-Avalon neighborhood, and deprive these communities of gathering places, and medical, social, business and recreational services

2. To make way for light rail, WSLE will eliminate over one hundred houses and apartments.

- a. The full number of residential buildings to be razed cannot be estimated. While Sound Transit's Directors have selected a route, until construction plans and budgets are set, there will be uncertainties. Current documentation indicates that Sound Transit will bulldoze everything from single houses in Delridge to 92 apartments in Jefferson Square. The Executive Summary of the WSLE FEIS indicates that the Preferred Alternative will require displacing 165 to 173 residential properties.
- b. Despite large numbers of new housing units and apartments built in West Seattle since 2014, rent and purchase costs have increased, not decreased. That has pushed out less wealthy residents (see *Seattle Times* May 12, 2024) and increased their needs to travel longer distances for work, shopping and entertainment, most often by car. Many have moved to other cities.
- c. Transit-oriented development (TOD -- dense housing, such as apartments, multiplexes, and ADUs) has been built along the Delridge, Avalon and East Junction bus routes of Rapid Ride H and C, and 21 and 128. Sound Transit will bulldoze a significant portion of existing bus-served TOD for the rail line, and not replace it for up to 10 years, further depriving West Seattle of affordable housing, while wasting public resources.

3. The Sound Transit Board has the authority to choose the No Build option for WSLE.

- a. Under Section 2 of the ST3 package that voters approved in 2016, the board must reconsider projects that are infeasible, unaffordable and/or unbuildable. WSLE is all three.
- b. Contrary to what regional and city leaders are saying, the WSBLE and WSLE light rail proposals can be re-considered, and better transit options can be chosen – under the No Build option
- c. No Build is a legitimate, legal, and responsible choice, which is included, under federal and state law, in all environmental reviews of large, disruptive transit construction projects. Based on the findings of the environmental process through this date, project sponsors should adopt the No Build option.
- d. The No Build option for WSLE will only affect the West Seattle corridor:
 - i. other ST3 projects could continue to be studied and implemented, as they are subject to a separate environmental process, and
 - ii. Sound Transit will still be able to get [Federal Capital Investment Grants](#) for non-light rail transit, and for expansion of high-capacity fixed-route bus transit.

4. Since no Modal Alternatives Analysis (MAA) was ever done, the environmental process and analysis for this project are flawed. This makes the Sound Transit board's choice of light rail questionable.

- 1. The decision to use light rail, rather than other, lower-carbon, less expensive, disruptive and destructive alternatives, was made prior to EIS analysis. Generally, an alternatives

- analysis is required to assure that the best and second-best options are considered, especially when benefit-to-cost ratios vary significantly across the alternatives.
2. Sound Transit and partner agencies conducted an MAA analysis to justify selecting Stride BRT for the I-405 corridor. The 2014 modal analysis for the Downtown Seattle to West Seattle corridor, however ([South King County HCT Corridor Study](#)) was completed with ST2 funding, and aimed at justifying extension of the ST3 light rail program to the exclusion of all other modes.
 - a. This ten-year-old, pre-ST3 work does not present an up-to-date, objective modal alternatives analysis. It did not weigh all potential BRT features and characteristics, or justify more than \$7 billion expenditure for a four-mile light rail line, with massive, adverse construction impacts.
 - b. ST's 2024 FEIS forecast that WSLE light rail would attract an additional 2,000 transit riders per day in the 2040s, presents an insignificant level of customer growth for a \$7 billion public outlay. Until Sound Transit completes an objective environmental process, that compares all reasonable modal alternatives for this corridor, further development of high-capacity transit should be put on hold.
 3. In not listing any modal alternatives to light rail, the FEIS bases its rationale on funding, not comparative analysis:
 - a. **"The [West Seattle light rail extension] project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016.** The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode identified for this corridor was light rail." [Comment response 4 on citizen comment 0672 in Appendix O of the WSLE FEIS]
 - b. Page 6.2 of the FEIS explains further that alternative bus modes were not considered: "A purpose of the project, as identified in Chapter 1, "Purpose and Need for West Seattle and Ballard Link Extensions," is to provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan. **The mode (bus) was considered in the Level 1 analysis but was not carried forward since it was not identified and analyzed in the Sound Transit 3 Plan.**"

Concluding Summary:

1. The Downtown-West Seattle (WSLE) light rail line should not be built (No Build option). Within the No Build option, the Ballard-Downtown segment should also be reconsidered.
2. Sound Transit's WSLE presents more disadvantages than advantages, including overwhelmingly negative social, economic and environmental impacts. As such, it fails to satisfy basic criteria set forth by ST3 and its FEIS for improving corridor transit. The costs, and negative environmental, economic and residential impacts of WSLE outweigh the benefits of building it
3. Current transit modes carry more passengers now, without transfers and wait times, than light rail promises to carry when completed. WSLE will degrade rather than improve the ridership experience.
4. The 146,000 tons of carbon that WSLE construction will generate – reduced from 614,000 tons in the Draft EIS -- plus elimination of and damage to acres of carbon absorbing forest and habitat, will be more than what a short light rail line can mitigate through year 2105.

5. Choosing the light rail investment over more flexible, effective and cheaper transit modes presents significant opportunity costs for the City of Seattle, and the regional transit network.
6. Sound Transit can achieve better ridership by continuing to expand and electrify King County Metro and ST Regional Express bus services, on the West Seattle peninsula, W. Seattle-Downtown corridor, and beyond.

Any Sound Transit taxing district resident opposed to the construction of the West Seattle light rail extension has three paths of action:

1. Use emailtheboard@soundtransit.org to contact all board members. As 17 of its 18 members are elected officials, and accountable to voters, [each can be contacted directly](#) by their own constituents.
 - The Seattle members include City Council Member [Daniel Strauss](#), Mayor [Bruce Harrell](#), Council Member [Rob Saka](#) **, ST Board Chair [Dow Constantine](#) **, and King County Council Member [Girmay Zahilay](#). (** indicates lives in West Seattle). City Council Member Rob Saka chairs the City Council's Transportation Committee. [King County Council Member Teresa Mosqueda](#) also lives in West Seattle.
 - Include specific information from this document in messages to officials
 - Contact board and council members by letter, phone and email, and urge (or demand) that they:
 - Stand up for businesses, jobs, housing, communities, and the environment in Seattle.
 - Call for adopting the **No Build Option** still listed in both the 2024 WSLE FEIS and the 2022 WSBLE DEIS.
 - Require Sound Transit to consider cheaper, less destructive, lower carbon transit options than rail for the Downtown-West Seattle corridor.
 - Support using other modes, including buses, bus rapid transit, and other transit service connections to the regional rail network
2. Contact Port of Seattle Commissioners [Fred Felleman](#), [Ryan Calkins](#), [Toshiko Hasegawa](#), and [Hamdi Mohamed](#), Regional Transportation Manager [Geraldine Poor](#), Chief of Staff [Aaron Pritchard](#), and management staff [LeeAnne Schirato](#), [Kathy Roeder](#) and [Sabrina Bolieu](#).
 - Ask them to object vigorously and officially to impacts the WSLE bridge will cause, and remind them of what the Port of Seattle has opposed – obstruction of the East and West Duwamish waterways, impairment of maritime traffic and businesses, damage to the Duwamish River and Longfellow Creek ecosystems, and a huge carbon footprint.
3. Email local business organizations that will be affected:
 - * [West Seattle Chamber of Commerce](#)
 - * [West Seattle Junction Association](#)

Appendix

Additional Considerations from Research Literature

1. Consumer willingness to fund light rail development decreases as cost increases

[Economists at the Federal Reserve Bank of St Louis](#) showed that when consumers understand the actual costs of getting light-rail services, the amount is generally more than they are willing to pay.

Nationwide, annual light-rail operating costs (\$778.3 million) far exceed fare revenue (\$226.1 million). The balance (\$552.2 million) is paid for with tax dollars. Examples (see also Snohomish-King-Pierce below): Fare revenues cover only 28.2% of system operating costs for St. Louis, 19.4% for Baltimore and 21.4% for Buffalo. If construction costs are added, losses become so large, no light-rail system can possibly recoup its costs.

Based solely on dollar cost, economists at the Federal Reserve Bank of St. Louis suggest that annual light-rail subsidies in St. Louis could instead be used more efficiently to buy a hybrid Toyota Prius every five years and pay annual maintenance costs of \$6,000 for 7,700 low-income transit riders – with minimal pollution increases, and only a 0.5 percent increase in traffic congestion. Funds would still be left for all other MetroLink riders to pay for ride-share and bus fares.

Houston: When [Houston Metro proposed the Purple line in 2008](#), it estimated a \$591 million cost, and 28,750 weekday riders. By September 2020, costs reached \$822 million, with daily expected ridership decreased to 5,230, meaning a per rider cost of about \$150,000 to build the Purple Line.

Snohomish-King-Pierce Counties:

1. [Sound Transit revenues do not cover its operating expenses](#)
 - a. Sound Transit farebox revenues in 2023 covered only 16% of Link light rail operating costs (lower than the 40% minimum policy threshold), 9% of ST Express bus operating costs (below the 20% threshold), and 7% of Sounder costs (below the 23% threshold).
 - b. Revenue vs. cost gaps widen more when construction costs are added. Examples:
 - i. Adding together operations, maintenance and construction costs, light rail fare revenues cover less than 3%.
 - ii. For Sounder North commuter rail, ST over-estimated ridership by 90%, and underestimated total costs vs. farebox revenue by 95%.
 - c. As regional revenues will never cover or recoup its full costs, Sound Transit must add millions of dollars in federal grants and borrowed money to cover them.

2. Three factors drive excessive U.S. transit project costs

As Sound Transit cost overruns have become chronic, the [New York experience provides a cautionary tale](#) about how to structure transit projects, and how to avoid pitfalls.

Factors that add approximately 85% to costs include extra money going to red tape, wasted contingencies, paying workers during delays, defensive design, and profit. Specific factors include:

- Lack of design standardization: this leads to fewer economies of scale, the inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process.

- Labor: 40-60% of the project's hard costs in the U.S. Labor costs in low-cost cases: Turkey, Italy, and Sweden are in the 19-30% range; Sweden, the highest-wage case among them, is 23%.
- U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher.

3. Selection of urban transit alternatives shows bias toward light rail over alternative modes, even when rail serves fewer riders at higher cost.

"The overlooked transport project planning process — What happens before selecting the Locally Preferred Alternative?" by [Yadi Wang](#) & [David Levinson](#), in [Transportation Research Interdisciplinary Perspectives, Volume 19](#), May 2023, 100809 //

<https://www.sciencedirect.com/science/article/pii/S2590198223000568>

Analyzing 43 U.S. light rail projects, the study found that on average, the 'do-minimum' option generates a Ridership to Cost Ratio (RCR) nine times higher than the Locally Preferred Alternative (LPA), and the average RCR produced by the second-best alternative is 86% higher than that of the LPA, indicating **substantial opportunity costs of rejecting more economical courses of action**, which could have likely managed prospective demand at much lower costs and delivered more services for more people at the same budgetary outlay.

Yet, transit agencies and officials only compared the preferred light rail mode against the traditional bus mode in the Transportation Systems Management (TSM) base option, indicating selection bias and discrimination in early-stage appraisal and decision-making.

4. Station development does not generally benefit low-income transit users

A [2019 University of Houston study](#) finds mixed effects on the welfare of neighborhoods after light rail construction. Researchers estimated an \$11,000 average increase in median income for neighborhoods near the new rail line development; but most gains go to high-income neighborhoods, while low-income neighborhoods see their income decline. The observed income polarization may be explained by poverty magnet and gentrification effects occurring simultaneously across the treated neighborhoods.

Light Rail Transit (LRT) does not appear to consistently deliver on its progressive policy goals of alleviating labor-skill mismatch, creating time cost savings, and increasing income mobility.

5. Light rail development does not reduce congestion

[Los Angeles: While light rail investments may increase transit accessibility and ridership within high-demand corridors, it does not reduce congestion.](#)

6. Per Capita Transit Ridership Is Declining

[Since 2013, U.S. transit ridership has declined, despite continued growth in population.](#)

Ridership has peaked and decreased seven different times since 1980, but overall, transit ridership per capita has decreased by nearly 15%. Researchers are evaluating economic considerations, fuel price, changing modal choices, and other areas as possible causes for the decline.

Demographic trends help to explain declining transit usage:

- a. The U.S. [population is aging](#). While young age cohorts have a higher propensity for transit use, they represent a lower share of the population.
- b. Simultaneously, significant population declines in some of the counties with high-quality transit service and use is being mirrored by population growth in counties with lower levels of transit service and use. Rapidly growing counties had half the rate of commuting to work by transit as did rapidly declining counties.
- c. [Over 90% of U.S. population growth in 2023 occurred outside of its 124 largest cities](#). Among the 124 cities that the U.S. Census Bureau reports with populations over 200,000, about a third have lost population except 14 over 200,000 populations cities in Texas, and nine in Florida. Medium-sized cities in Florida, the Carolinas, and Las Vegas suburbs also added to the population. Americans are presently trading dense, urban, transit-oriented cities for less expensive, more spacious living elsewhere. How this will play out in transit development and politics are key questions.

7. The Great Inversion: socio-economic status and race re-sort urban-suburban residency

Suburbia increasingly sorted on bases of socio-economic status and race ([Nijman, 2020](#); [Nijman & Clery, 2015](#)). As suburbs continue growing:

- a. based on economic affordability ([Kolko, 2017](#)),
- b. central-cities appear to revive and renew growth, as city as “the office,” especially for growing numbers of self-employed and freelancers, in the new urban, knowledge transfer and networking economy, that thrives in a high density and high circulation environment ([Carlino, 2015](#); [Kloosterman, 2020](#); [Scott, 2017](#)).

Cities and city centers as preeminent sites of consumption, consumer services, and amenities: [Glaeser, Kolko, and Saiz \(2000\)](#). Also, rise of cities as sites of *consumption* ([Jayne, 2005](#))

Significance of actual vs. relative numbers of workers, types of workers, incomes, and vulnerabilities of ‘gig economy’ and ‘sharing/platform economy’: ([Graham, Hjorth, & Ledonvirta, 2017](#); [Davidson & Infranca, 2016](#); [Shambaugh, Nunn, & Bauer, 2018](#)).

8. Public transit is losing its customer base

During the pandemic, people formed new mobility habits, and most are not returning to regular use of urban buses and trains. In a 2022 survey of 38 transit agencies worldwide, researchers found a 10% loss in the transit customer base, as reported by the [International Association of Public Transit](#).

As of spring 2024, Sound Transit has not yet consistently reached its original 2010 light rail ridership target to the University District, even including the extension to Northgate, according to the U.S. Federal Transit Administration’s National Transit Database (NTD). ST’s original goal was an average of 2.7 million boardings per month. It has touched that level in a few months since 2018, such as for the Taylor Swift events in SODO. But it has not reached this ridership level on average in 2024. Across all central Puget Sound transit agencies, NTD reports transit ridership as of April 2024 was 30% lower than in pre-pandemic 2019.

9. Federal transit agencies and experts have questioned the value of urban light since the mid-1980s:

[Ken Orski, Urban Mobility Corp. transportation management consultant](#), quoted in mid-1986:
 “Mass transportation is the way the other fellow is supposed to get to work.”

Sam Zimmerman, USDOT Urban Grants Manager, quoted in June, 1986 (Zimmerman helped Approve Seattle's 3rd Ave tunnel project):

- “No city is a paradigm. Good transit solutions are showing up differently in different locations. Transit agency people are ... *involved in selling a product that is obsolete for the emerging market.* (emphasis added). The traditional transit market is relatively small, not growing, and travels mainly downtown, which is where buses and trains do the best job.”

Rick Setner, UMTA Deputy Director (now FTA), quoted at Washington, DC, in June 1986:

- Determining cost effectiveness and overall cost per hour of user benefit is a complex formula. It reckons all costs (capital, interest, operations, maintenance), divided by hours of benefit — including travel time savings to existing & new riders, plus net additional new riders.
- Transit agencies want benefit hours to increase, to make the most benefit for most people. Moving people from bus to rail is not beneficial if:
 - rail doesn't replace bus, and
 - the agency is just measuring per-trip cost of a single trip from point A to point B, without including full trip distance. The result may be misleading.
- Light rail is not flexible; it's the equivalent of a Maginot Line (see France post-World War 1). Each NYC line in 1938 carried more than all three subway lines do now — because population has shifted to suburbs.

Alan Pisarski, author of [Commuting in America](#), quoted in June 1986:

- “A low density, highly dispersed market without substantive corridors is not something traditional transit can respond to. One of the great games is defining the notion of what comprises “transit.” It gets broader every year. Today, it's basically everything that is not an individual car: HOV lanes (Shirley Highway HOV lane, VA, is America's busiest transportation corridor outside NYC), taxis, car & van pools.”
- “Many city officials look at light rail as a panacea: it's new, glitzy, and makes them a “world class” city. In some cities it's appropriate, in many more, it has very limited application, or it is not appropriate at all, because it's cost prohibitive.”
 - “If you have six miles to do, it makes no sense to build six miles of tunnel, and/or lay six miles of track and wire. Instead of looking to be “world class” (a PR purpose), look to move people around (transit purpose).”
- “Traditional transit service is suburb to downtown office. Suburban 1980s jobs grew three times more than downtown areas, creating a dispersed pattern of commuter travel, which cannot be easily and conveniently served. It's the reason why there's so much traffic congestion: we're more dependent on cars.”
- As of the mid-1980s:
 - Only 6-8% of employees working in station-based office developments use rail to commute to work. Up to 94% use SOVs (single occupancy vehicles). While rail stimulates development, it will create more traffic congestion than before, not reduce congestion.
 - Rail transit successfully stimulates development around suburban rail stations, but only plays a modest role in serving people who work in station-based offices.

- Building new rail lines may actually have the perverse effect of exacerbating congestion & inequity (see **3. and 4.** above).

USDOT Undersecretary Peter Rogoff, May 18, 2010, addressing Federal Reserve Bank of Boston, MA (Rogoff is former Sound Transit CEO)

- Financial difficulties facing mass transit networks are partially due to an “unnecessary focus” on rail expansion over bus improvements. Using the flexibility of buses, “you can move a lot of people at very little cost compared to rail.”
- “Paint is cheap, rails [sic] systems are extremely expensive”. He further stated, “...paint a designated bus lane on the street system. Throw in signal preemption, and you can move a lot of people at very little cost compared to rail.”

UMTA 1995 COMPARISON OF SELECTED RAIL SYSTEM COSTS, RIDERSHIPS ^

	<u>LENGTH</u>	<u>COST</u>		<u>AVG. RIDERS PER DAY</u>	
	<u>miles</u>	<u>estmt'd.</u>	<u>actual</u>	<u>estmt'd.</u>	<u>actual</u>
Buffalo, NY	6.4	\$336M	\$536M	184,000 (1995)	35,000
Baltimore	14.0	\$450M	\$990M	206,000 (1980)	55,000*/**
Wash., DC	70	\$2.5B	\$10B	800,000 (1990)	500,000**
Portland, OR	15	\$143M	\$214M	42,500 (1995)	20,000
Sacramento	18	\$136M	\$196M	20,000 (1990)	13,000
San Francisco	71	\$700M	\$1.7B	255,000 (1975)	200,000**
San Diego	20	\$***	\$258M	12,000 (1981)	30,000
Atlanta	32	\$1.37B	\$2.9B	578,000 (1995)	195,000**
Miami, FL	20	\$795M	\$1.05B	202,000 (1995)	36,000**

M = million / B = billion

Atlanta & Washington figures assume full system in place

* Baltimore did not open until 1984

** Indicates heavy rail system. Systems are generally funded with 75% federal, 25% local money.

*** San Diego had no federal funding for its first 15.9-mile line

^ Source: Urban Mass Transit Administration

10. [City of Seattle critique of ST3 DEIS](#) (quote of excerpts):

- Sound Transit is considering cost savings refinements in response to its 2021 ST3 Realignment. Some of these proposed strategies are drastic.
 - We discourage scope reductions that do not bring commensurate benefit to the system and its riders, and that are not consistent with what was committed to voters.
 - We do not support strategies that would reduce access to the system.
- The City supports studying refinements that help control costs and provide meaningful benefits to local communities and the broader transit system and its riders, including:
 - Mix-and-match refinements for flexibility to choose segment alternatives that provide greatest benefit or fewest impacts;

- Refinements to stations that would improve safe, non-motorized access;
- Refinements that would avoid, minimize, or mitigate adverse project impacts.

11. Pandemic-caused vacancy rate increases in downtown areas

Between April 2019 and January 2023, [Seattle had the second-highest downtown commercial vacancy rate in the U.S. \(14.2%\)](#). [“Seattle's office vacancy rate reached 23.2% in July 2024](#), according to [a recent report by Commercial Edge Research](#), highlighting the city's struggle to adapt to post-pandemic market conditions,”

While Metro Transit ridership in 2024 has recovered to 75% of pre-COVID levels, full ridership recovery is questionable as work from home + hybrid structures continue, and central employment and commerce locations diversify from downtown Seattle.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I am writing to you with a request that you carefully examine the current Sound Transit West Seattle Light Rail Extension Environmental Impact Statement (attachment 1) and the alternative EIS that was drafted by Rethink the Link (attachment 2), and exert your influence to stop the Sound Transit project in favor of an alternative, less costly, plan. Below are summary points of well researched and verified impacts that the current plan would have (specific details and data on each can be found in the Rethink the Link EIS).</p> <p>Negative Impact on Transit Times and Ridership:</p> <p>WSLE will degrade transit service, increasing travel times and requiring multiple transfers, which will negatively impact rider experience and reduce ridership efficiency.</p> <ul style="list-style-type: none"> • High Carbon Emissions from Construction: <p>The construction of WSLE will generate significant carbon emissions (140,952 metric tons), which will take decades to mitigate, making it environmentally unsustainable.</p> <ul style="list-style-type: none"> • Destruction of Forest and Habitat: <p>WSLE will eliminate acres of forest and habitat, causing irreparable environmental damage and exacerbating urban heat islands, particularly affecting low-income and minority communities.</p> <ul style="list-style-type: none"> • Economic and Social Setbacks: <p>The project will set back economic development, equity, and community-building efforts in West Seattle and the Chinatown-International District for at least a decade.</p> <ul style="list-style-type: none"> • High Costs and Financial Burden: <p>The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects, with questionable financial sustainability.</p> <ul style="list-style-type: none"> • Displacement of Businesses and Residents: <p>WSLE will displace over 100 houses and apartments and at least 70 businesses, leading to job losses and further economic disruption in affected communities.</p> <ul style="list-style-type: none"> • Lack of Voter Awareness and Misinformation: <p>Many voters were unaware of the significant negative impacts of WSLE when they approved ST3 in 2016, including environmental damage and increased costs.</p> <ul style="list-style-type: none"> • Inefficiency Compared to Current Transit Modes: <p>Current bus and rapid transit services are more efficient, carrying more passengers with lower carbon footprints and fewer environmental impacts than the proposed light rail.</p> <ul style="list-style-type: none"> • Legal and Responsible No Build Option: <p>The Sound Transit Board has the authority to choose the No Build option, which is a legitimate and responsible choice under federal and state law and would avoid the negative impacts of WSLE.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>• Better Alternatives Available:</p> <p>Lower carbon, less expensive, and less destructive public transit options, such as bus lane expansions and electrification of the bus fleet, are available and could serve West Seattle riders more effectively than WSLE.</p>	
2	<p>Since the 2016 ST3 vote, Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE. With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension (WSLE) does not satisfy the ST3 and DEIS criteria, and should not be built. The experts found that:</p> <ul style="list-style-type: none"> • WSLE transit times and therefore ridership will degrade, not improve West Seattle transit service after the WSLE and Ballard LE open in 2032 and 2042 respectively • The construction generation of carbon will be more than carbon-reducing impacts of WSLE trains can mitigate over five future decades of WSLE operation. • Acres of forest and habitat will be eliminated, and much more of it irreparably damaged • Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network: • Economic development in West Seattle and Chinatown-International District will be set back for at least a decade • Equity, community-building and social justice will be set back at least a decade, <p>And raising the question, based upon the newest, September 2024 WSLE cost estimate: "How can six to seven billion dollars be better spent to improve public transit?"</p>	<p>Your support for the No Build Alternative has been noted.</p>
3	<p>Lower carbon, less expensive and less destructive public transit options than WSLE have been studied by Sound Transit, are available and serving West Seattle riders better now than rail will in the future.</p>	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>
4	<p>1. The WSLE light rail plan will not improve transit or rider experience on the Downtown- West Seattle corridor. It will make them worse.</p> <p>a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though heavy traffic may cause it to take longer.</p> <p>b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfers in West Seattle and SODO (see "transfer penalty" in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer.</p>	<p>Chapter 3, Transportation Environment and Consequences, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) provides ridership forecasts and travel times.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers.</p> <p>2. Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.</p> <p>a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.</p> <p>b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)</p> <p>i. The FEIS sorts ridership forecasts based on several options:</p> <ul style="list-style-type: none"> a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built b) Two station scenario, without Avalon station c) Three station scenario with Delridge, Avalon and Junction stations <p>ii. Appendix 2 of Sound Transit's Transportation Technical Report shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.</p> <p>c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day.</p> <p>d. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.</p> <p>The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix, ** Per Capita Transit Ridership Is Declining**).</p>	
5	<p>The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle corridor.</p> <p>a. ST's WSBLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service.</p> <p>b. Presently, public and private roadway buses, vanpools and ride-share services can be programmed to carry more riders than light rail, often faster and less</p>	<p>Refer to response to comment 3 regarding mode selection for the West Seattle Link Extension. A list of bus route service changes for each of the Build Alternatives is provided in Section 3.3.2, Build Alternatives, of Appendix N.1, Transportation Technical Report of the West Seattle Link Extension Final EIS. Bus service assumptions for both the No Build Alternative and Build Alternatives were developed by King County Metro Transit (Metro) and Sound Transit as part of Appendix B, Transit Service Integration</p>

Appendix C. Comments Received on the Final EIS and Responses

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	<p>expensively. And their routes can be modified - unlike light rail -- as conditions change.</p> <ol style="list-style-type: none"> 1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers 2. King County Metro: <ol style="list-style-type: none"> a) is planning to transition its entire fleet of buses to electric power. <p>has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas.</p>	<p>Technical Memorandum, of Attachment N.1A, Transportation Technical Analysis Methodology, of Appendix N.1. Bus service would be restructured to integrate with the project, which would result in removing or truncating some lines but generally replacing them with reliable, high frequency light rail service. The bus service hours savings from removing or truncating routes would be redeployed elsewhere in accordance with Metro's service guidelines. The 2042 Build Alternatives assume there will be changes to bus service in the West Seattle Link Extension project corridor to integrate with the new light rail line. The service changes are based on Metro Connects and coordination with Metro regarding this project.</p>
6	<p>As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by attracting new riders, and expanding walkable, car-free urbanism near three new West Seattle light rail stations.</p> <ol style="list-style-type: none"> a. Based on a technical re-calculation in the Final EIS Sound Transit has set the mitigation period of WSLE construction-generated carbon to at least 2080, even while reducing the originally stated 614,000 metric tons of greenhouse gases (GHG) (DEIS table 4.2.6-3) to 140,952 tons (FEIS table 4.6.3). The total carbon footprint, which is primarily embodied in production of concrete used to build structures and track ways, is still significant. <ul style="list-style-type: none"> • Sound Transit claims that operating WSLE (including heating, ventilation and air conditioning (HVAC)) will: <ol style="list-style-type: none"> a. generate 60 metric tons of carbon annually, kept low based on using 100% renewable energy for station operations b. displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032. <ul style="list-style-type: none"> ○ Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080. b. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941 tons. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941 tons per year reduced, yields a payback period of 48 years – until the year 2080, to mitigate WSLE construction carbon. 	<p>Refer to Section 4.6, Air Quality, and Section 4.10, Energy Impacts, of the West Seattle Link Extension Final EIS for air quality and energy analyses. As described in Section 4.6.6.1.2, Construction Emissions, construction emissions were calculated using Federal Transit Administration's (FTA's) Transit Greenhouse Gas Estimator V3.0. Printouts of the results from this estimator are available in Appendix L4.6E, Greenhouse Gas Analysis. Section 4.6.6.1.2 also discusses the emerging nature of this field of analysis and provides additional context for interpreting these results.</p> <p>Refer to Appendix L4.6E for more information on the greenhouse gas emissions modeling.</p> <p>For more information on Sound Transit's environmental policy and sustainability initiatives, please visit Sound Transit's website at https://www.soundtransit.org/get-to-know-us/environment-sustainability.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>c. Table 4.6-1, "Regional Vehicle Miles Traveled and Average Daily Traffic Change," shows the Build option will only reduce car and light truck miles traveled by 0.02% compared to the No Build option (15,400 reduction from 85,366,700 vehicles total). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.</p> <p>d. Sound Transit has not done a proper impact evaluation for light rail alignments and possible other modes. This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.</p> <p>e. The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.")</p> <ul style="list-style-type: none"> • TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...") • The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2,941 tons generated by the methodology Sound Transit uses in the WSLE FEIS. • This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly. • While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated. <p>f. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.</p> <p>g. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's</p>	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>and King County's goals are to achieve carbon neutrality by 2050.</p> <ul style="list-style-type: none"> • However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use. • As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day. • Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not. <p>The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated. Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from TreePAC.org. Those trees would have absorbed an estimated 64,000 tons of carbon a year (City of Seattle & One tree Planted)- nearly half the carbon output from WSBLE construction.</p>	

From: Candace Shattuck <candace.shattuck@gmail.com>

Sent: Friday, January 31, 2025 2:08 PM

To: Assam, Mark (FTA) <Mark.Assam@dot.gov>

Subject: Citizen Input for the West Seattle Light Rail Record of Decision, scheduled for release February 28, 2025

You don't often get email from candace.shattuck@gmail.com. [Learn why this is important](#)

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I write to urge that you not approve this project. A copy of an alternative EIS prepared by Rethink the Link, a group of citizens including qualified experts in the field who dissent, is attached. It expresses the reasons not to proceed far better than I can. What I want to add is an ordinary citizen's POV. In this case, someone who has only lived in the city for 4-1/2 yers, having moved here from a rural area with no public transportation whatever. I'd like to give you what I believe is an unbiased view of a senior member of the community who chooses to use busses frequently.

The project was approved back in 2016 as part of a larger regional transportation package, much of which has been completed and not all of which is operating well. The West Seattle extension was included in vague terms which Sound Transit interprets as light rail; there are other far more affordable options which do not involve the major limitations of the current proposal, which include exorbitant cost, displacement of a significant number of residences and businesses; destruction of irreplaceable forest and habitat, and so on. What voters approved was transportation to downtown. The proposed route only goes to what is referred to locally as SODO, meaning South of Downtown. Their proposal all but ignores the issue of adequate parking, which is already tight. Although it is only conjecture, I am doubtful the proposal would pass today.

There are few IF ANY benefits of the Sound Transit plan. It is a mystery to me why they seem so determined to proceed. There are many better ways to spend transportation dollars: even a small fraction of the estimated \$7B could make dramatic, useful, and socially positive improvements in the bus system, which is already very good.

Pease support the NO BUILD option.

Candace Shattuck
2745 California Ave SW, Apt 435
Seattle, WA 98116
410-725-1240

Attached: Alternate EIS

https://static1.squarespace.com/static/62fa7817a9f2447f1d8f8c65/t/6736cbcf6b2f507723608d9/1731644367738/RethinkTheLink_Final_EIS-C_v5.1.pdf

West Seattle Light Rail Environmental Impact Statement-Conclusion (EIS-C)

Citizen Comment for Entry into the WSLE Record of Decision With FTA Response Respectfully Requested

An independent assessment of the environmental impact
of the Sound Transit West Seattle-Link Extension (WSLE) light rail proposal

Submitted by Rethink The Link (RTTL) and Regional Transit Colleagues

Revision 5.1 November 14, 2024 | Replaces earlier versions

Hot linked documents should be considered as attached to this document.

Comments or Questions? Contact RTTL at contact@rethinkthelink.org

Section 1: Executive Summary

The Ballard-Downtown-West Seattle light rail discussion started from the premise that roadway-based modes could not handle peak period passenger demand in that corridor. Thus, in 2016, Sound Transit presented a West Seattle-Ballard link extension (WSBLE) light rail proposal in its ST3 transportation package. It offered simple criteria for voters to consider:

- improve public transit,
- encourage economic development, equity, community-building and social justice,
- protect the environment.

Sound Transit's January 2022 WSBLE Draft Environmental Impact Statement (DEIS) was designed to show that:

- the simple criteria outlined in ST3 would be satisfied, and
- WSBLE's proposed advantages would outweigh its disadvantages.

In the 2016 ST3 package, and the 2022 Draft EIS, the West Seattle and Ballard light rail segments were combined into one project routed through downtown Seattle. As changes to the Ballard portion required additional work, Sound Transit and the USDOT Federal Transit Administration (FTA) separated Ballard into its own project, and moved forward with a discrete West Seattle (WSLE) environmental review process. WSLE has been separated again into West Seattle-SODO and SODO-downtown segments, and ST has now initiated a new EIS review process for the Ballard-downtown portion.

Independent transit experts present their findings here, based on:

- researching and analyzing information from the West Seattle sections of the 2022 WSBLE DEIS, public comments submitted about the DEIS, and the Final EIS (FEIS) released September 20, 2024,
- related transit studies and historical records, (see [Appendix](#) of this document), and
- comments to Sound Transit's Board of Directors after their selection of a WSLE trackway route on October 24, 2024.

With Sound Transit estimating a \$6.5-\$7.1 billion cost for WSLE alone, funding for the Ballard project's estimated \$12 billion cost could be delayed or even canceled. This stems from Sound Transit

historically underestimating costs, over-estimating ridership, delaying projects, and now approaching its debt ceiling horizon in the next few years.

Given these circumstances, Sound Transit cannot confirm when and whether WSLE may tie into the larger light rail network. In the FEIS, it forecasts 27,000 daily riders on WSLE, but it will not deliver that many until 2042, when the SODO-downtown tunnel segment is completed – requiring additional funds and creating additional impacts. Between 2032 (expected WSLE delivery date) and 2042, King County Metro will continue running its West Seattle-downtown buses. This led ST to inform the FTA (by email 5/12/23) that expected WSLE ridership will be 5400 per day for the 2032-2042 period.

Thus, WSLE will not deliver on claims summarized in FEIS ES.2.3, that it “is expected to reduce dependency on single-occupancy vehicles, slow down growth in vehicle miles traveled, conserve energy, and reduce greenhouse gas emissions.” It will not “reduce daily vehicle miles traveled by approximately 17,000 by 2042, helping to achieve Washington state’s greenhouse gas emissions goals.”

The environmental process and analysis for this project is also flawed by Sound Transit never having conducted a Modal Alternatives Analysis or Major Investment Analysis.

This analysis would have informed the decisions that Sound Transit’s Board made in choosing high-capacity transportation (HCT) mode(s) for the Downtown-SODO-West Seattle corridor. Items the analysis would have likely revealed:

1. light rail is less cost effective on a per rider basis than bus and bus rapid transit (BRT). With no evidence of Sound Transit conducting this analysis, it has failed the board, and called the board’s choice of light rail into question (See **Section 5, Item 4** for details).
2. Bus alternatives could be deployed to serve the corridor for less than \$1 billion, and would most likely attract more transit riders than the additional 2000 that Sound Transit’s FEIS predicts will ride WSLE by 2042 (see Section 2, Ridership 2.d. below).

Sound Transit’s environmental review process has revealed more disadvantages than advantages with the WSLE. With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension does not satisfy the ST3 and DEIS criteria and should not be built. Expert evaluation of the environmental record shows that:

- WSLE transit times and therefore ridership will degrade West Seattle transit service, not improve it after the WSLE and Ballard LE open in 2032 and 2042 respectively
- The construction-generated carbon will be more than passenger loads on WSLE trains and TOD land use effects can mitigate over five future decades of WSLE operation.
- Acres of forest and habitat will be eliminated, and much more of it irreparably damaged
- Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network:
 - Economic development in West Seattle will be set back for at least a decade
 - Equity, community-building and social justice will be set back at least a decade,
 - -- raising the question, based upon the newest, September 2024 WSLE cost estimate: “How can six to seven billion dollars be better spent to improve public transit?”

The Sound Transit Board can and should choose the No Build option for the WSLE.

- [Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016](#), allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.
- ST Executive Corridor Director Cahill Ridge's told the November 2017 West Seattle Transportation Coalition public meeting that ST "has no Plan B" for WSLE if financial, disruptive technology or other factors arise. He was incorrect. ST has several Plan B options available.
- Lower carbon, less expensive and less disruptive and destructive public transit options than WSLE have been studied by Sound Transit, are available now, and serving West Seattle riders better than rail will in the future. Options include, but are not limited to:
 - a. Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane
 - b. Add north and south Busway exits from east end of West Seattle Bridge
 - c. Add to exclusive bus lanes in West Seattle
 - d. Complete the Metro Transit initiative to electrify its bus fleet
- No Build is a legitimate, legal, and responsible choice, included under federal and state law in all environmental reviews of large, disruptive transit construction projects. ST3 project sponsors can and should consider this option and should note that the facts overall point to selection of No Build.

This document addresses the West Seattle link extension specifically, and the WSLE generally. It contributes summary information to the decision-making processes for:

- local and state government officials who regulate and influence Sound Transit decision making, and
- citizens who pay significant taxes (see "revenues vs. costs" below) to fund Sound Transit, in the expectation that their government will provide improved mobility services.
- government decision makers who have to decide what the WSLE Record of Decision (ROD) will finally state as the result of the environmental process for WSLE.

Section 2: Current Transit Ridership and Forecasts for West Seattle-Downtown Corridor, and Region

1. **The WSLE light rail plan will not improve transit or rider experience on the Downtown-West Seattle corridor. It will make them worse.**
 - a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though it may take longer if traffic is heavy.
 - b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on-transfer times in West Seattle and SODO (see "transfer penalty" in [Equity 1.b](#) below). Traffic may still be a factor causing bus rides to take longer.
 - c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers.
2. **Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.**
 - a. ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to

approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.

- b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)
 - i. The FEIS sorts ridership forecasts based on several options:
 - (a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built
 - (b) Two station scenario, without Avalon station
 - (c) Three station scenario with Delridge, Avalon and Junction stations
 - ii. Appendix 2 of [Sound Transit's Transportation Technical Report](#) shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.
 - c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro Transit, whose 2020 West Seattle-Downtown corridor count was 27,000 riders per day.
 - d. The Final EIS on page 3-2 states, "The addition of the West Seattle Link Extension to the regional transit system would result in about 2,000 net new daily transit trips by 2042." This number is:
 - i. not mentioned in the FEIS Executive Summary and is not otherwise publicized by Sound Transit on its website or in any other documents,
 - ii. contradicted by ST's 5/12/23 email to FTA.
 - e. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.
 - i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see **Appendix 6., "Per Capita Transit Ridership Is Declining"**).
3. [Sound Transit is not building what voters approved](#) as ST3 in 2016:
- Voters are getting a different rail plan than Sound Transit presented as ST3 in 2016:
- i. The original Ballard-West Seattle line (WSBLE) is now two separate lines – BLE and WSLE
 - ii. **The \$1.7 billion ST3 budget for WSLE is now \$6-\$7 billion.** Listed Rapid Ride corridor improvements have not been made, and WSLE's 2030 delivery date will not be met.
 - iii. The ST3 proposal did not describe Pigeon Point deforestation, "irreparable" habitat damage, or give any notice of a large carbon footprint from construction as documented in earlier Sound Transit projects.
 - iv. Additional carbon and pollution generated from 5-8 years of traffic congestion is not specified in the DEIS but may be tallied in SDOT's (Seattle Dept. of Transportation) annual carbon assessment.
4. **Few people who voted for ST3 in 2016 understood WSLE's significant negative impacts.**
- a. Until 2015, Sound Transit's ST3 plans only included a light rail connection to Ballard.

- b. Changing course in 2016, Sound Transit included a short light rail line to West Seattle in ST3. It promised that if voters approved ST3, bus and rapid transit service would be improved, and detailed light rail planning and public outreach would follow.
- c. The ST3 proposal did not mention negative impacts that WSLE would generate on voters' transit experiences, the environment, and losses of homes, businesses and jobs.

5. Puget Sound Regional Council (PSRC) and Sound Transit data show that by 2050, light rail will only carry 3% of all regional trips, and buses only about 5% -- despite PSRC expecting 1.8 million more residents living in the Kitsap-Snohomish-King-Pierce region.

- a. PSRC expects that:
 - i. buses and trains together will carry just 15% of trips In Seattle.
 - ii. most trips in the four-county region will be carried by shared and single occupancy vehicles.
- b. The Metro Transit rationale for supporting WSLE is that transferring passengers onto the four-mile rail line will free buses it can redeploy for more frequent local service.
 - i. Data and experience, including "transfer penalty" and truncated bus routes, do not appear to support this rationale.
 - ii. Metro Transit stated to the West Seattle Transportation Coalition in 2014 that it will cancel a bus route costing more than \$7 per rider (about \$10 in 2024 dollars). The September 2024 WSLE cost estimate of \$6-\$7 billion to serve 27,000 riders, puts its per rider expenditure on its 2032 opening day at \$222,000-\$260,000 per rider (see Economics 3.2.a. below).
 - 1. Using ST estimates of 4 million WSLE riders per year and adding \$40 million per year cost for operations and maintenance, per rider cost may decrease to \$1500 for the first year, and eventually plateau at \$600 per rider in perpetuity.
 - 2. If rail does not replace bus, and per-trip cost from point A to point B is not reduced, then moving riders from bus to rail is not beneficial. If only the rider's trip is measured, without including distance, the result may be misleading. For example:
 - a. Neither Metro Transit nor Sound Transit appear to have made cost-benefit calculations to assess the transit cost effectiveness of WSLE.
 - b. Metro's plan for WSLE to replace four miles of bus corridor means it will deliver \$10 /rider passengers to one station of a \$1500 /rider rail line, then use another \$10 /rider bus to pick up the portion of those riders who don't continue on rail.
 - c. Passengers who ride further on rail may also transfer to bus at the end of their rail segment.
 - iii. Electrification of the Metro bus fleet, and expansion of flexibly routed bus service that would connect riders more efficiently to destinations within and beyond West Seattle, and would yield a far better cost-benefit ratio. It could be funded with a fraction of the \$6-\$7 billion estimated for a single, four-station SODO-WSLE route.

- iv. Improving bus service should also include City of Seattle exercising its municipal authority to eliminate road bottlenecks and give buses more priority in traffic.
6. **The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail study and planning phase.**
- a. ST's WSBLE DEIS outlined non-rail improvements that could be made on West Seattle-Downtown corridor, such as roadway upgrades, and bus, van and other transit additions to increase service.
 - b. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle-SODO-Downtown corridor.
 - c. Presently, public and private roadway buses, vanpools and ride-share services can carry more riders than light rail, often faster and less expensively.
 - d. Unlike fixed rail, routes for non-rail options can be modified as conditions change, because roadways provide transit flexibility and redundancy options that rail cannot.
 - 1. As the Seattle area grows, transit alternatives other than light rail can, and according to PSRC, will provide better rider experiences, including more direct service, shorter wait times, and fewer transfers
 - 2. King County Metro:
 - a. is planning to transition its entire fleet of buses to electric power.
 - b. has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas.
7. **The unique light rail bridge – that has not yet been designed, would extend 1.5 miles from SODO to Pigeon Point at a minimum 100-foot height over the Spokane St. viaduct, SR99, and the Duwamish River. This presents risks of rising expenses and construction delays:**
- a. No passenger railroad bridge of this length and consistent height has ever been built.
 - b. The bridge will run over the [Seattle Fault earthquake and liquefaction zone](#), creating engineering challenges and downstream risks.
 - i. Structural shifting caused by the 2001 Nisqually earthquake contributed to the 2022 failure of the West Seattle high bridge, and its 2-1/2 year closure for repairs. The proposed WSLE bridge follows the same pathway at a generally higher elevation.

Section 3: Economics

- 1. **At the present \$6-\$7 billion estimate, Sound Transit will have spent \$1.1-\$1.3 million per rider to put each passenger on the train for WSLE's opening day** (including construction, interest payment, operations, and maintenance costs).
 - a. Opening day per rider WSLE cost is based on ST's May 12, 2023, email to the Federal Transportation Administration, estimating 5,400 boardings per day between 2032 and 2042, during the 10-year period Metro Transit continues to run its C, H and 21X bus lines

on the West Seattle-Downtown corridor, until the SODO-Downtown segment is complete in 2042.

- i. After Year 1, expecting approximately 194,000 riders per year, per rider cost may drop to \$3107-\$3621 per rider, and by 2042, drop to \$381-\$330 per rider.
 - b. By 2042, it is estimated that Sound Transit will have spent an additional \$2 billion (or possibly more) for the SODO-Downtown segment, including a second tunnel. Metro Transit will terminate Rapid Ride C, H and 21X bus service on the corridor. From that point, Sound Transit estimates WSLE ridership will increase to 27,000 boardings per day. Cost on opening day may thereby drop to \$296,000-\$334,000 per rider, calculating a \$8-\$9 billion total for the complete extension.
 - i. Depending on Sound Transit's amortization schedule for the \$8-\$9 billion total WSLE + Downtown segment construction expenditure, plus interest payments, plus \$40 million estimated annual WSLE operations & maintenance cost, overlaying annual ridership estimates of 4 million, per rider cost may plateau between \$600-\$1500 in perpetuity.
 - c. **In advocating for WSLE rail to replace buses on the 4-mile SODO-WS corridor, Metro Transit is advocating to deliver \$10 per rider passengers to a \$600 to \$1.3 million per rider WSLE train station, for a four-mile ride, to a stop where they may transfer to another \$10 per rider Metro bus.**
 - d. The non-profit Transportation Choices Coalition testified at Sound Transit's September 26, 2024, board meeting that price should be no object. Between Washington's powerful Congressional delegation able to funnel debt-relief capital to Sound Transit, and the perpetual \$1780 minimum per year in Sound Transit taxes that every Pierce, King and Snohomish County household has been paying since 2017, TCC believes money will be perpetually available for light rail projects.
 - e. In 2022, Sound Transit reported a \$12 billion budget shortfall, then recast its accounting to appear \$6 billion in debt. At ST's September 19, 2024, board meeting, ST CEO Goran Sparrman and Deputy CEO of Megaproject Delivery Terri Mestas asserted that the \$6-\$7 billion cost for WSLE can be managed.
 - f. It would appear that, if cost were no object, Sound Transit could spend any amount needed for WSLE, and tunnel from SODO to the east bank of the Duwamish, use an immersed tube or other tunnel to cross beneath the Duwamish, then tunnel from the west bank to the West Seattle Junction, reducing most impacts listed here.
 - i. This project revision would require Sound Transit to generate a separate EIS.
2. **At \$6-\$7 billion (\$1.5 billion-\$1.75 billion per mile) for 4 miles (Seattle Transit Blog), WSLE is the world's second-most expensive urban rail project, behind NYC's subway upgrade (\$2.8 billion /mile), but ahead of San Francisco's subway (\$920 million /mile)**
 - a. The \$6-\$7 billion estimate covers only the SODO-West Seattle light rail segment
 - b. Additional cost will be incurred to build the SODO-Downtown Seattle tunnel link.
 3. **WSLE may present revenue losses and opportunity costs for transit across the region (Snohomish, King, and Pierce counties), and for the key light rail city of Seattle.**

- a. While city and county revenues have decreased, Sound Transit will eliminate businesses, services and properties that pay into municipal tax rolls.
 - i. Neither ST, Seattle nor King County has run cost-benefit analyses to judge whether trading a decade's worth of WSLE-caused tax revenue losses for anticipated future revenue will pencil out – given that:
 - 1. Neither ST nor the City of Seattle has calculated what net economic benefits WSLE will create for West Seattle, the CID and SODO, and
 - 2. While light rail creates benefits in some areas, West Seattle commerce and real estate markets up to now have not significantly suffered, even during the pandemic.
- b. Rejecting more economical transit options presents substantial opportunity costs. For the same budgetary outlay, lower cost options could likely manage prospective demand, and deliver more services for more people (See "Overlooked transport project planning process..." **Appendix Item 3.**).
 - i. The study found that the 'do-minimum' option (e.g., buses to serve a corridor vs. more expensive options such as light rail) generates a Ridership to Cost Ratio (RCR) nine times higher than the Locally Preferred Alternative (LPA – light rail in our locality), and the second-best alternative produced an average RCR that was 86% higher than the LPA.
- c. **The FEIS states that WSLE may displace up to 133 businesses, employing 1,230 people. The final number will be uncertain until ST chooses a final WSLE alignment.**
 - i. The business (commercial and service), and job losses will be spread between West Seattle (70-100 businesses, up to 1000 jobs), SODO industrial and Chinatown-International District (CID) areas.
 - ii. The number of businesses displaced will depend on the WSLE preferred alignment finally chose. [West Seattle blogger Marie McKinsey](#) offered this list of possible business displacements in 2022, extending from Jefferson Square (37 closures) to Delridge (West Seattle Athletic Club, Uptown Espresso, Skylark Cafe), to West Marginal Way. As ST focuses more on a preferred alignment, losses will become more clear.
 - iii. Patronage estimates by affected businesses (e.g., 7-11, Taco Time, Starbucks) average 1000 customers per day, with more for larger enterprises (e.g., Trader Joe's, Safeway).
 - iv. Businesses forcibly relocated have low survival rates, particularly in minority and low-to-middle income neighborhoods: 1974 Urban Renewal study: (<https://www.kcdc.org/wp-content/uploads/2022/10/A-Case-Study-of-the-Consequences-of-Displacement-Caused-by-Urban.pdf>). "The non-survival rate was highest among the small eating and drinking, food stores, and miscellaneous retail and services."
 - v. Demographic trends show upscale, primarily White workers moving back to urban centers of employment and commerce, and non-White workers and businesses moving or (immigrants) taking up residence in suburban areas (see "'Great Inversion,'" **Appendix 7**).

1. As these trends continue, it is even less likely minority businesses will be able to successfully relocate, and even less likely the employees of these businesses will find places they can afford to live.
 2. While light rail helps move people to areas of the city where they can recreate and consume, it does not support people who are providing the businesses and jobs for the more metropolitan population.
 - d. Rather than allowing WSLE to create an estimated \$6-\$7 billion in opportunity costs for Seattle and the region, the money could be better invested in other transit options within the WSBL corridor and beyond, yielding a lower carbon footprint, and fewer environmental, social and economic impacts.
4. **Freight, public transit, emergency services and commuters will be disrupted, and productivity impacted for 5-8 years, as West Seattle's main roads north, west and south of the WS High Bridge are blocked during construction.**

Section 4: Local Environment and Global Climate

1. **As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:**
 - **attracting new riders, and**
 - **expanding walkable, car-free urbanism near three new West Seattle light rail stations.**
 - a. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e) forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6-3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total...").
 1. The restatement is used to extend the mitigation period by at least 50 years – to 2080, or later.
 2. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them.
 3. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period
 4. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit.
 5. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy
 - i. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032.
 - ii. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080.**

- iii. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941 tons.
 - 1. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941 tons per year reduced, yields a payback period of 48 years – until the year 2080, to mitigate WSLE construction carbon.
- b. **The Build option will only reduce car and light truck miles traveled by 0.02%** compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total – Table 4.6-1, “Regional Vehicle Miles Traveled and Average Daily Traffic Change”). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic.
- c. **Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes.** This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington.
- d. **The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit’s construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 (“An Update on Public Transportation’s Impacts on Greenhouse Gas Emissions.”)**
 - TCRP 226 outlines a “land use effect” of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also “below, and [Appendix 2](#). “Station Development...”)
 - The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2,941 tons generated by the methodology Sound Transit uses in the WSLE FEIS.
 - This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again, to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly.
 - While the DEIS Appendix L4.6 states that “general FTA estimates” have been applied, no federal project the size of WSLE’s 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated.
- e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.
- f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle’s and King County’s goals are to achieve carbon neutrality by 2050.
 - However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won’t be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use.

- As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day.
 - Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not.
 - g. **The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated.** Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from [TreePAC.org](https://treepac.org). Those trees would have absorbed an estimated 64,000 tons of carbon a year ([City of Seattle](#) & [One tree Planted](#)) – nearly half the carbon output from WSBL construction.
2. **The City of Seattle can ill afford to lose more tree canopy.** Seattle has lost 255 acres of trees since 2017 (acreage cut by Sound Transit within city limits may be included in the Seattle count). Globally [in 2023, forests and other land ecosystems emitted almost as much carbon dioxide as they absorbed](#), due to fires, deforestation, and other factors.
- a. Eliminating acres of forest will exacerbate Seattle’s heat islands, which are worst around light rail stations, areas where the city’s commerce and employment are concentrated, and within its low income and of-color communities. Lower economic areas are more prone to suffer from adverse heat conditions, fewer parks and less tree cover. They are less economically able to afford air conditioning or other means to keep cool.
 - Heat sink areas, King County Executive (& ST Chair) Dow Constantine’s “Three Million Trees Initiative”, City of Seattle’s Trees for Neighborhoods program, KC Land Conservation Initiative:
<https://kingcounty.gov/en/legacy/elected/executive/constantine/news/release/2021/june/23-heat-mapping-results> (June 23, 2021)
 - b. The WSLE will eliminate three acres of north Pigeon Point Forest, plus 1-3 more acres of West Seattle green space, and beaver, salmon, heron and other species habitats there and on the Duwamish River and Longfellow Creek.
 - Sound Transit has not calculated costs for man-made elements to replace erosion control, storm water management, oxygen production, carbon sink, shade, and other ecosystem services provided by green infrastructure.
 - c. As Sound Transit runs its modest program to replace trees it has eliminated, and Seattle’s recent \$13 million in federal grants will help fund planting trees in Delridge and the Chinatown International District, the two entities will simply be working back from the deficit ST will cause with WSLE.
 - d. Replacing mature trees with saplings is what Nature does after a natural disaster. Sound Transit is imitating a natural disaster.
3. **Under Washington’s Climate Commitment Act (CCA), Sound Transit’s claimed level of carbon emissions in the FEIS – 146,000 metric tons over five to six years of construction – qualify it as a “large quantity carbon emissions generator” (LQG). The LQG threshold is 25,000 metric tons of carbon per year.**

- a. The best way to avoid emission is not to generate them (see **Minnesota** below).
 - b. The WSBLE DEIS does not address purchases of carbon offsets, or other high-quantity mitigation plans for this massive output.
 - c. The Puget Sound Clean Air Agency's (PSCAA) analysis finds ". the Chinatown International District and Duwamish Valley neighborhoods facing disproportionate air pollution impacts, impacts from WSBLE construction, and more sensitive health outcomes in the form of higher air quality-related hospitalizations."
 - d. PSCAA AQ Director Kathy Strange commented in 2022 on Sound Transit's WSBLE DEIS, that "...transportation emissions will be improved in the long-term because of light rail..." The data prove otherwise.
 - e. Currently, [Minnesota is the only U.S. state holding its agencies accountable to its climate goals](#). A provision in its 2024 transportation law requires both state and municipal transportation planning agencies to take the state's climate goals into account when assessing new projects. **And it provides a guideline Washington State could emulate.**
- 4. Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE.**
- 5. Since the 1980s, federal transportation agencies and transit experts, including former ST CEO Peter Rogoff, have questioned the value of light rail for most urban areas. (See [Appendix 9](#)).**

Section 5: Equity

1. Sound Transit's WSLE proposal does not prioritize equity.

- a. The WSLE will serve the more affluent parts of West Seattle, while travel from less affluent, more diverse areas with more mobility disadvantaged citizens will require more transfers and take longer
- b. A "transfer penalty" will affect riders arriving at stations by bus at ground level. They must either ride or climb multiple levels up or down to reach a train. At the Junction station, walk time may add five minutes to the transfer, and the wait time for the next train may add another 10.
- c. Light rail will not improve access for residents who live in West Seattle's transit deserts (those lacking convenient access to transit within ¼ mile walk).
 - i. Metro buses re-deployed after the 2042 opening of WS-CID service will not deliver residents in West Seattle to new locations of businesses and services that WSLE will have displaced.
 - ii. Building WSLE will instead encourage more use of private vehicles to reach these new business, service and shopping locations.
- d. Elimination of the Frye Business Center and commercial properties to the north and south for construction of the Delridge and Avalon light rail stations will:
 - i. exacerbate the "food desert" of grocery and prepared food providers between North Delridge and California Ave SW, for the area's mixed demographic communities

- ii. eliminate the walkable/15-minute Delridge-Avalon neighborhood, and deprive these communities of gathering places, and medical, social, business and recreational services

2. To make way for light rail, WSLE will eliminate over one hundred houses and apartments.

- a. The full number of residential buildings to be razed cannot be estimated. While Sound Transit's Directors have selected a route, until construction plans and budgets are set, there will be uncertainties. Current documentation indicates that Sound Transit will bulldoze everything from single houses in Delridge to 92 apartments in Jefferson Square. The Executive Summary of the WSLE FEIS indicates that the Preferred Alternative will require displacing 165 to 173 residential properties.
- b. Despite large numbers of new housing units and apartments built in West Seattle since 2014, rent and purchase costs have increased, not decreased. That has pushed out less wealthy residents (see *Seattle Times* May 12, 2024) and increased their needs to travel longer distances for work, shopping and entertainment, most often by car. Many have moved to other cities.
- c. Transit-oriented development (TOD -- dense housing, such as apartments, multiplexes, and ADUs) has been built along the Delridge, Avalon and East Junction bus routes of Rapid Ride H and C, and 21 and 128. Sound Transit will bulldoze a significant portion of existing bus-served TOD for the rail line, and not replace it for up to 10 years, further depriving West Seattle of affordable housing, while wasting public resources.

3. The Sound Transit Board has the authority to choose the No Build option for WSLE.

- a. Under Section 2 of the ST3 package that voters approved in 2016, the board must reconsider projects that are infeasible, unaffordable and/or unbuildable. WSLE is all three.
- b. Contrary to what regional and city leaders are saying, the WSBLE and WSLE light rail proposals can be re-considered, and better transit options can be chosen – under the No Build option
- c. No Build is a legitimate, legal, and responsible choice, which is included, under federal and state law, in all environmental reviews of large, disruptive transit construction projects. Based on the findings of the environmental process through this date, project sponsors should adopt the No Build option.
- d. The No Build option for WSLE will only affect the West Seattle corridor:
 - i. other ST3 projects could continue to be studied and implemented, as they are subject to a separate environmental process, and
 - ii. Sound Transit will still be able to get [Federal Capital Investment Grants](#) for non-light rail transit, and for expansion of high-capacity fixed-route bus transit.

4. Since no Modal Alternatives Analysis (MAA) was ever done, the environmental process and analysis for this project are flawed. This makes the Sound Transit board's choice of light rail questionable.

- 1. The decision to use light rail, rather than other, lower-carbon, less expensive, disruptive and destructive alternatives, was made prior to EIS analysis. Generally, an alternatives

- analysis is required to assure that the best and second-best options are considered, especially when benefit-to-cost ratios vary significantly across the alternatives.
2. Sound Transit and partner agencies conducted an MAA analysis to justify selecting Stride BRT for the I-405 corridor. The 2014 modal analysis for the Downtown Seattle to West Seattle corridor, however ([South King County HCT Corridor Study](#)) was completed with ST2 funding, and aimed at justifying extension of the ST3 light rail program to the exclusion of all other modes.
 - a. This ten-year-old, pre-ST3 work does not present an up-to-date, objective modal alternatives analysis. It did not weigh all potential BRT features and characteristics, or justify more than \$7 billion expenditure for a four-mile light rail line, with massive, adverse construction impacts.
 - b. ST's 2024 FEIS forecast that WSLE light rail would attract an additional 2,000 transit riders per day in the 2040s, presents an insignificant level of customer growth for a \$7 billion public outlay. Until Sound Transit completes an objective environmental process, that compares all reasonable modal alternatives for this corridor, further development of high-capacity transit should be put on hold.
 3. In not listing any modal alternatives to light rail, the FEIS bases its rationale on funding, not comparative analysis:
 - a. **"The [West Seattle light rail extension] project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016.** The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode identified for this corridor was light rail." [Comment response 4 on citizen comment 0672 in Appendix O of the WSLE FEIS]
 - b. Page 6.2 of the FEIS explains further that alternative bus modes were not considered: "A purpose of the project, as identified in Chapter 1, "Purpose and Need for West Seattle and Ballard Link Extensions," is to provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan. **The mode (bus) was considered in the Level 1 analysis but was not carried forward since it was not identified and analyzed in the Sound Transit 3 Plan.**"

Concluding Summary:

1. The Downtown-West Seattle (WSLE) light rail line should not be built (No Build option). Within the No Build option, the Ballard-Downtown segment should also be reconsidered.
2. Sound Transit's WSLE presents more disadvantages than advantages, including overwhelmingly negative social, economic and environmental impacts. As such, it fails to satisfy basic criteria set forth by ST3 and its FEIS for improving corridor transit. The costs, and negative environmental, economic and residential impacts of WSLE outweigh the benefits of building it
3. Current transit modes carry more passengers now, without transfers and wait times, than light rail promises to carry when completed. WSLE will degrade rather than improve the ridership experience.
4. The 146,000 tons of carbon that WSLE construction will generate – reduced from 614,000 tons in the Draft EIS -- plus elimination of and damage to acres of carbon absorbing forest and habitat, will be more than what a short light rail line can mitigate through year 2105.

5. Choosing the light rail investment over more flexible, effective and cheaper transit modes presents significant opportunity costs for the City of Seattle, and the regional transit network.
6. Sound Transit can achieve better ridership by continuing to expand and electrify King County Metro and ST Regional Express bus services, on the West Seattle peninsula, W. Seattle-Downtown corridor, and beyond.

Any Sound Transit taxing district resident opposed to the construction of the West Seattle light rail extension has three paths of action:

1. Use emailtheboard@soundtransit.org to contact all board members. As 17 of its 18 members are elected officials, and accountable to voters, [each can be contacted directly](#) by their own constituents.
 - The Seattle members include City Council Member [Daniel Strauss](#), Mayor [Bruce Harrell](#), Council Member [Rob Saka](#) **, ST Board Chair [Dow Constantine](#) **, and King County Council Member [Girmay Zahilay](#). (** indicates lives in West Seattle). City Council Member Rob Saka chairs the City Council's Transportation Committee. [King County Council Member Teresa Mosqueda](#) also lives in West Seattle.
 - Include specific information from this document in messages to officials
 - Contact board and council members by letter, phone and email, and urge (or demand) that they:
 - Stand up for businesses, jobs, housing, communities, and the environment in Seattle.
 - Call for adopting the **No Build Option** still listed in both the 2024 WSLE FEIS and the 2022 WSBLE DEIS.
 - Require Sound Transit to consider cheaper, less destructive, lower carbon transit options than rail for the Downtown-West Seattle corridor.
 - Support using other modes, including buses, bus rapid transit, and other transit service connections to the regional rail network
2. Contact Port of Seattle Commissioners [Fred Felleman](#), [Ryan Calkins](#), [Toshiko Hasegawa](#), and [Hamdi Mohamed](#), Regional Transportation Manager [Geraldine Poor](#), Chief of Staff [Aaron Pritchard](#), and management staff [LeeAnne Schirato](#), [Kathy Roeder](#) and [Sabrina Bolieu](#).
 - Ask them to object vigorously and officially to impacts the WSLE bridge will cause, and remind them of what the Port of Seattle has opposed – obstruction of the East and West Duwamish waterways, impairment of maritime traffic and businesses, damage to the Duwamish River and Longfellow Creek ecosystems, and a huge carbon footprint.
3. Email local business organizations that will be affected:
 - * [West Seattle Chamber of Commerce](#)
 - * [West Seattle Junction Association](#)

Appendix

Additional Considerations from Research Literature

1. Consumer willingness to fund light rail development decreases as cost increases

[Economists at the Federal Reserve Bank of St Louis](#) showed that when consumers understand the actual costs of getting light-rail services, the amount is generally more than they are willing to pay.

Nationwide, annual light-rail operating costs (\$778.3 million) far exceed fare revenue (\$226.1 million). The balance (\$552.2 million) is paid for with tax dollars. Examples (see also Snohomish-King-Pierce below): Fare revenues cover only 28.2% of system operating costs for St. Louis, 19.4% for Baltimore and 21.4% for Buffalo. If construction costs are added, losses become so large, no light-rail system can possibly recoup its costs.

Based solely on dollar cost, economists at the Federal Reserve Bank of St. Louis suggest that annual light-rail subsidies in St. Louis could instead be used more efficiently to buy a hybrid Toyota Prius every five years and pay annual maintenance costs of \$6,000 for 7,700 low-income transit riders – with minimal pollution increases, and only a 0.5 percent increase in traffic congestion. Funds would still be left for all other MetroLink riders to pay for ride-share and bus fares.

Houston: When [Houston Metro proposed the Purple line in 2008](#), it estimated a \$591 million cost, and 28,750 weekday riders. By September 2020, costs reached \$822 million, with daily expected ridership decreased to 5,230, meaning a per rider cost of about \$150,000 to build the Purple Line.

Snohomish-King-Pierce Counties:

1. [Sound Transit revenues do not cover its operating expenses](#)
 - a. Sound Transit farebox revenues in 2023 covered only 16% of Link light rail operating costs (lower than the 40% minimum policy threshold), 9% of ST Express bus operating costs (below the 20% threshold), and 7% of Sounder costs (below the 23% threshold).
 - b. Revenue vs. cost gaps widen more when construction costs are added. Examples:
 - i. Adding together operations, maintenance and construction costs, light rail fare revenues cover less than 3%.
 - ii. For Sounder North commuter rail, ST over-estimated ridership by 90%, and underestimated total costs vs. farebox revenue by 95%.
 - c. As regional revenues will never cover or recoup its full costs, Sound Transit must add millions of dollars in federal grants and borrowed money to cover them.

2. Three factors drive excessive U.S. transit project costs

As Sound Transit cost overruns have become chronic, the [New York experience provides a cautionary tale](#) about how to structure transit projects, and how to avoid pitfalls.

Factors that add approximately 85% to costs include extra money going to red tape, wasted contingencies, paying workers during delays, defensive design, and profit. Specific factors include:

- Lack of design standardization: this leads to fewer economies of scale, the inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process.

- Labor: 40-60% of the project's hard costs in the U.S. Labor costs in low-cost cases: Turkey, Italy, and Sweden are in the 19-30% range; Sweden, the highest-wage case among them, is 23%.
- U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher.

3. Selection of urban transit alternatives shows bias toward light rail over alternative modes, even when rail serves fewer riders at higher cost.

"The overlooked transport project planning process — What happens before selecting the Locally Preferred Alternative?" by [Yadi Wang](#) & [David Levinson](#), in [Transportation Research Interdisciplinary Perspectives, Volume 19](#), May 2023, 100809 // <https://www.sciencedirect.com/science/article/pii/S2590198223000568>

Analyzing 43 U.S. light rail projects, the study found that on average, the 'do-minimum' option generates a Ridership to Cost Ratio (RCR) nine times higher than the Locally Preferred Alternative (LPA), and the average RCR produced by the second-best alternative is 86% higher than that of the LPA, indicating **substantial opportunity costs of rejecting more economical courses of action**, which could have likely managed prospective demand at much lower costs and delivered more services for more people at the same budgetary outlay.

Yet, transit agencies and officials only compared the preferred light rail mode against the traditional bus mode in the Transportation Systems Management (TSM) base option, indicating selection bias and discrimination in early-stage appraisal and decision-making.

4. Station development does not generally benefit low-income transit users

A [2019 University of Houston study](#) finds mixed effects on the welfare of neighborhoods after light rail construction. Researchers estimated an \$11,000 average increase in median income for neighborhoods near the new rail line development; but most gains go to high-income neighborhoods, while low-income neighborhoods see their income decline. The observed income polarization may be explained by poverty magnet and gentrification effects occurring simultaneously across the treated neighborhoods.

Light Rail Transit (LRT) does not appear to consistently deliver on its progressive policy goals of alleviating labor-skill mismatch, creating time cost savings, and increasing income mobility.

5. Light rail development does not reduce congestion

[Los Angeles: While light rail investments may increase transit accessibility and ridership within high-demand corridors, it does not reduce congestion.](#)

6. Per Capita Transit Ridership Is Declining

[Since 2013, U.S. transit ridership has declined, despite continued growth in population.](#)

Ridership has peaked and decreased seven different times since 1980, but overall, transit ridership per capita has decreased by nearly 15%. Researchers are evaluating economic considerations, fuel price, changing modal choices, and other areas as possible causes for the decline.

Demographic trends help to explain declining transit usage:

- a. The U.S. [population is aging](#). While young age cohorts have a higher propensity for transit use, they represent a lower share of the population.
- b. Simultaneously, significant population declines in some of the counties with high-quality transit service and use is being mirrored by population growth in counties with lower levels of transit service and use. Rapidly growing counties had half the rate of commuting to work by transit as did rapidly declining counties.
- c. [Over 90% of U.S. population growth in 2023 occurred outside of its 124 largest cities](#). Among the 124 cities that the U.S. Census Bureau reports with populations over 200,000, about a third have lost population except 14 over 200,000 populations cities in Texas, and nine in Florida. Medium-sized cities in Florida, the Carolinas, and Las Vegas suburbs also added to the population. Americans are presently trading dense, urban, transit-oriented cities for less expensive, more spacious living elsewhere. How this will play out in transit development and politics are key questions.

7. The Great Inversion: socio-economic status and race re-sort urban-suburban residency

Suburbia increasingly sorted on bases of socio-economic status and race ([Nijman, 2020](#); [Nijman & Clery, 2015](#)). As suburbs continue growing:

- a. based on economic affordability ([Kolko, 2017](#)),
- b. central-cities appear to revive and renew growth, as city as “the office,” especially for growing numbers of self-employed and freelancers, in the new urban, knowledge transfer and networking economy, that thrives in a high density and high circulation environment ([Carlino, 2015](#); [Kloosterman, 2020](#); [Scott, 2017](#)).

Cities and city centers as preeminent sites of consumption, consumer services, and amenities: [Glaeser, Kolko, and Saiz \(2000\)](#). Also, rise of cities as sites of *consumption* ([Jayne, 2005](#))

Significance of actual vs. relative numbers of workers, types of workers, incomes, and vulnerabilities of ‘gig economy’ and ‘sharing/platform economy’: ([Graham, Hjorth, & Ledonvirta, 2017](#); [Davidson & Infranca, 2016](#); [Shambaugh, Nunn, & Bauer, 2018](#)).

8. Public transit is losing its customer base

During the pandemic, people formed new mobility habits, and most are not returning to regular use of urban buses and trains. In a 2022 survey of 38 transit agencies worldwide, researchers found a 10% loss in the transit customer base, as reported by the [International Association of Public Transit](#).

As of spring 2024, Sound Transit has not yet consistently reached its original 2010 light rail ridership target to the University District, even including the extension to Northgate, according to the U.S. Federal Transit Administration’s National Transit Database (NTD). ST’s original goal was an average of 2.7 million boardings per month. It has touched that level in a few months since 2018, such as for the Taylor Swift events in SODO. But it has not reached this ridership level on average in 2024. Across all central Puget Sound transit agencies, NTD reports transit ridership as of April 2024 was 30% lower than in pre-pandemic 2019.

9. Federal transit agencies and experts have questioned the value of urban light since the mid-1980s:

[Ken Orski, Urban Mobility Corp. transportation management consultant](#), quoted in mid-1986:
 “Mass transportation is the way the other fellow is supposed to get to work.”

Sam Zimmerman, USDOT Urban Grants Manager, quoted in June, 1986 (Zimmerman helped Approve Seattle's 3rd Ave tunnel project):

- “No city is a paradigm. Good transit solutions are showing up differently in different locations. Transit agency people are ... *involved in selling a product that is obsolete for the emerging market.* (emphasis added). The traditional transit market is relatively small, not growing, and travels mainly downtown, which is where buses and trains do the best job.”

Rick Setner, UMTA Deputy Director (now FTA), quoted at Washington, DC, in June 1986:

- Determining cost effectiveness and overall cost per hour of user benefit is a complex formula. It reckons all costs (capital, interest, operations, maintenance), divided by hours of benefit — including travel time savings to existing & new riders, plus net additional new riders.
- Transit agencies want benefit hours to increase, to make the most benefit for most people. Moving people from bus to rail is not beneficial if:
 - rail doesn't replace bus, and
 - the agency is just measuring per-trip cost of a single trip from point A to point B, without including full trip distance. The result may be misleading.
- Light rail is not flexible; it's the equivalent of a Maginot Line (see France post-World War 1). Each NYC line in 1938 carried more than all three subway lines do now — because population has shifted to suburbs.

Alan Pisarski, author of [Commuting in America](#), quoted in June 1986:

- “A low density, highly dispersed market without substantive corridors is not something traditional transit can respond to. One of the great games is defining the notion of what comprises “transit.” It gets broader every year. Today, it's basically everything that is not an individual car: HOV lanes (Shirley Highway HOV lane, VA, is America's busiest transportation corridor outside NYC), taxis, car & van pools.”
- “Many city officials look at light rail as a panacea: it's new, glitzy, and makes them a “world class” city. In some cities it's appropriate, in many more, it has very limited application, or it is not appropriate at all, because it's cost prohibitive.”
 - “If you have six miles to do, it makes no sense to build six miles of tunnel, and/or lay six miles of track and wire. Instead of looking to be “world class” (a PR purpose), look to move people around (transit purpose).”
- “Traditional transit service is suburb to downtown office. Suburban 1980s jobs grew three times more than downtown areas, creating a dispersed pattern of commuter travel, which cannot be easily and conveniently served. It's the reason why there's so much traffic congestion: we're more dependent on cars.”
- As of the mid-1980s:
 - Only 6-8% of employees working in station-based office developments use rail to commute to work. Up to 94% use SOVs (single occupancy vehicles). While rail stimulates development, it will create more traffic congestion than before, not reduce congestion.
 - Rail transit successfully stimulates development around suburban rail stations, but only plays a modest role in serving people who work in station-based offices.

- Building new rail lines may actually have the perverse effect of exacerbating congestion & inequity (see **3. and 4.** above).

USDOT Undersecretary Peter Rogoff, May 18, 2010, addressing Federal Reserve Bank of Boston, MA (Rogoff is former Sound Transit CEO)

- Financial difficulties facing mass transit networks are partially due to an “unnecessary focus” on rail expansion over bus improvements. Using the flexibility of buses, “you can move a lot of people at very little cost compared to rail.”
- “Paint is cheap, rails [sic] systems are extremely expensive”. He further stated, “...paint a designated bus lane on the street system. Throw in signal preemption, and you can move a lot of people at very little cost compared to rail.”

UMTA 1995 COMPARISON OF SELECTED RAIL SYSTEM COSTS, RIDERSHIPS ^

	<u>LENGTH</u>	<u>COST</u>		<u>AVG. RIDERS PER DAY</u>	
	<u>miles</u>	<u>estmt'd.</u>	<u>actual</u>	<u>estmt'd.</u>	<u>actual</u>
Buffalo, NY	6.4	\$336M	\$536M	184,000 (1995)	35,000
Baltimore	14.0	\$450M	\$990M	206,000 (1980)	55,000*/**
Wash., DC	70	\$2.5B	\$10B	800,000 (1990)	500,000**
Portland, OR	15	\$143M	\$214M	42,500 (1995)	20,000
Sacramento	18	\$136M	\$196M	20,000 (1990)	13,000
San Francisco	71	\$700M	\$1.7B	255,000 (1975)	200,000**
San Diego	20	\$***	\$258M	12,000 (1981)	30,000
Atlanta	32	\$1.37B	\$2.9B	578,000 (1995)	195,000**
Miami, FL	20	\$795M	\$1.05B	202,000 (1995)	36,000**

M = million / B = billion

Atlanta & Washington figures assume full system in place

* Baltimore did not open until 1984

** Indicates heavy rail system. Systems are generally funded with 75% federal, 25% local money.

*** San Diego had no federal funding for its first 15.9-mile line

^ Source: Urban Mass Transit Administration

10. [City of Seattle critique of ST3 DEIS](#) (quote of excerpts):

- Sound Transit is considering cost savings refinements in response to its 2021 ST3 Realignment. Some of these proposed strategies are drastic.
 - We discourage scope reductions that do not bring commensurate benefit to the system and its riders, and that are not consistent with what was committed to voters.
 - We do not support strategies that would reduce access to the system.
- The City supports studying refinements that help control costs and provide meaningful benefits to local communities and the broader transit system and its riders, including:
 - Mix-and-match refinements for flexibility to choose segment alternatives that provide greatest benefit or fewest impacts;

- Refinements to stations that would improve safe, non-motorized access;
- Refinements that would avoid, minimize, or mitigate adverse project impacts.

11. Pandemic-caused vacancy rate increases in downtown areas

Between April 2019 and January 2023, [Seattle had the second-highest downtown commercial vacancy rate in the U.S. \(14.2%\)](#). [“Seattle's office vacancy rate reached 23.2% in July 2024](#), according to [a recent report by Commercial Edge Research](#), highlighting the city's struggle to adapt to post-pandemic market conditions,”

While Metro Transit ridership in 2024 has recovered to 75% of pre-COVID levels, full ridership recovery is questionable as work from home + hybrid structures continue, and central employment and commerce locations diversify from downtown Seattle.

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I write to urge that you not approve this project. A copy of an alternative EIS prepared by Rethink the Link, a group of citizens including qualified experts in the field who dissent, is attached.</p> <p>The project was approved back in 2016 as part of a larger regional transportation package, much of which has been completed and not all of which is operating well. The West Seattle extension was included in vague terms which Sound Transit interprets as light rail; there are other far more affordable options which do not involve the major limitations of the current proposal, which include exorbitant cost, displacement of a significant number of residences and businesses; destruction of irreplaceable forest and habitat, and so on. What voters approved was transportation to downtown. The proposed route only goes to what is referred to locally as SODO, meaning South of Downtown. Their proposal all but ignores the issue of adequate parking, which is already tight. Although it is only conjecture, I am doubtful the proposal would pass today.</p> <p>There are few IF ANY benefits of the Sound Transit plan. It is a mystery to me why they seem so determined to proceed. There are many better ways to spend transportation dollars: even a small fraction of the estimated \$7B could make dramatic, useful, and socially positive improvements in the bus system, which is already very good.</p> <p>Pease support the NO BUILD option.</p>	<p>Your support for the No Build Option has been noted.</p>
2	<p>The environmental process and analysis for this project is also flawed by Sound Transit never having conducted a Modal Alternatives Analysis or Major Investment Analysis.</p> <p>This analysis would have informed the decisions that Sound Transit's Board made in choosing high-capacity transportation (HCT) mode(s) for the Downtown-SODO-West Seattle corridor. Items the analysis would have likely revealed:</p> <ol style="list-style-type: none"> 1. light rail is less cost effective on a per rider basis than bus and bus rapid transit (BRT). With no evidence of Sound Transit conducting this analysis, it has failed the board, and called the board's choice of light rail into question (See Section 5, Item 4 for details). 2. Bus alternatives could be deployed to serve the corridor for less than \$1 billion, and would most likely attract more transit riders than the additional 2000 that Sound Transit's FEIS predicts will ride WSLE by 2042 (see Section 2, Ridership 2.d. below). 	<p>Consistent with the State Environmental Protection Act (SEPA), the West Seattle Link Extension Final EIS provides the public and decision makers with information about the West Seattle Link Extension "at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified" (Washington Administrative Code [WAC] 197-11-055(2)). This is also consistent with the National Environmental Policy Act (NEPA), which provides that "Agencies shall integrate the NEPA process with other planning at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts" (40 Code of Federal Regulations 1501.2).</p> <p>Refer to response to comment 1 regarding the decision to select light rail as the mode for the West Seattle Link Extension.</p>
3	<p>Sound Transit's environmental review process has revealed more disadvantages than advantages with the WSLE. With its overwhelmingly negative social, economic and environmental</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Appendix C. Comments Received on the Final EIS and Responses

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	<p>impacts, the West Seattle Link Extension does not satisfy the ST3 and DEIS criteria and should not be built. Expert evaluation of the environmental record shows that:</p> <ul style="list-style-type: none"> • WSLE transit times and therefore ridership will degrade West Seattle transit service, not improve it after the WSLE and Ballard LE open in 2032 and 2042 respectively • The construction-generated carbon will be more than passenger loads on WSLE trains and TOD land use effects can mitigate over five future decades of WSLE operation. • Acres of forest and habitat will be eliminated, and much more of it irreparably damaged • Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network: • Economic development in West Seattle will be set back for at least a decade • Equity, community-building and social justice will be set back at least a decade, raising the question, based upon the newest, September 2024 WSLE cost estimate: "How can six to seven billion dollars be better spent to improve public transit?" 	
4	<p>Lower carbon, less expensive and less destructive public transit options than WSLE have been studied by Sound Transit, are available and serving West Seattle riders better now than rail will in the future, including but not limited to:</p> <ol style="list-style-type: none"> Rebuild of SR99-West Seattle Bridge interchange to add exclusive bus lane Add north and south Busway exits from east end of West Seattle Bridge Add to exclusive bus lanes in West Seattle Complete Metro Transit initiative to electrify bus fleet 	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>
5	<ol style="list-style-type: none"> The WSLE light rail plan will not improve transit or rider experience on the Downtown- West Seattle corridor. It will make them worse. <ol style="list-style-type: none"> RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though it may take longer if traffic is heavy. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on transfers in West Seattle and SODO (see "transfer penalty" in Equity 1.b. below). Traffic may still be a factor causing bus rides to take longer. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers. Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit. <ol style="list-style-type: none"> ST's 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). 	<p>Chapter 3, Transportation Environment and Consequences, of the Final EIS provides ridership forecasts and travel times.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.</p> <p>b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)</p> <p>i. The FEIS sorts ridership forecasts based on several options:</p> <p>a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built</p> <p>b) Two station scenario, without Avalon station</p> <p>c) Three station scenario with Delridge, Avalon and Junction stations</p> <p>ii. Appendix 2 of Sound Transit's Transportation Technical Report shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.</p> <p>a. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro, whose 2020 West Seattle-Downtown corridor count is 27,000 riders per day.</p> <p>b. The Final EIS on page 3-2 states, "The addition of the West Seattle Link Extension to the regional transit system would result in about 2,000 net new daily transit trips by 2042."</p> <p>This number is:</p> <p>i. not mentioned in the FEIS Executive Summary and is not otherwise publicized by Sound Transit on its website or in any other documents,</p> <p>ii. contradicted by ST's 5/12/23 email to FTA.</p> <p>e. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.</p> <p>i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see Appendix 6., "Per Capita Transit Ridership Is Declining").</p>	
6	<p>The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail planning phase..</p> <p>a. ST's WSLE DEIS outlined non-rail improvements that could be made in West Seattle, such as roadway upgrades, and bus, van and other transit service additions to increase service.</p> <p>b. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle corridor</p>	<p>Refer to response to comment 3 regarding mode selection for the West Seattle Link Extension. A list of bus route service changes for each of the Build Alternatives is provided in Section 3.3.2, Build Alternatives, of Appendix N.1, Transportation Technical Report of this West Seattle Link Extension Final EIS. Bus service assumptions for both the No Build Alternative and Build Alternatives were developed by King County</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<p>c. Presently, public and private roadway buses, vanpools and ride-share services can be programmed to carry more riders than light rail, often faster and less expensively.</p> <p>d. Unlike fixed rail, routes for non-rail options can be modified as conditions change, because roadways provide transit flexibility and redundancy options that rail cannot.</p> <ol style="list-style-type: none"> 1. As the Seattle area grows, transit alternatives other than light rail can provide better rider experiences, including more direct service, shorter wait times, and fewer transfers 2. King County Metro: <ol style="list-style-type: none"> a) is planning to transition its entire fleet of buses to electric power. b) has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas. 	<p>Metro Transit (Metro) and Sound Transit as part of Appendix B, Transit Service Integration Technical Memorandum, of Attachment N.1A, Transportation Technical Analysis Methodology, in Appendix N.1. Bus service would be restructured to integrate with the project, which would result in removing or truncating some lines but generally replacing them with reliable, high-frequency light rail service. The bus service hours savings from removing or truncating routes would be redeployed elsewhere in accordance with Metro's service guidelines. The 2042 Build Alternatives assume there will be changes to bus service in the West Seattle Link Extension project corridor to integrate with the new light rail line. The service changes are based on Metro Connects and coordination with Metro regarding this project.</p>
7	<p>As climate change worsens, Sound Transit's FEIS forecasts that WSLE preferred alignment construction will generate more carbon (greenhouse gas/GHG) emissions than it can mitigate by:</p> <ul style="list-style-type: none"> • attracting new riders, and • expanding walkable, car-free urbanism near three new West Seattle light rail stations. <p>a. The original 614,000 metric tons of greenhouse gas output from construction (MT CO₂e) forecast in the DEIS (Table 4.2.6-3), has been reduced to 509,544 MT CO₂e (Table 4.6-3, "Greenhouse Gas Emissions during Construction, Build Alternative: High-cost"), then 380,181 MT CO₂e ("Total...Build Alternative: Preferred") and finally re-stated as 140,952 MT CO₂e (FEIS Table 4.6-3, "Adjusted Total...").</p> <ol style="list-style-type: none"> 1. The restatement is used to extend the mitigation period by at least 50 years-to 2080, or later. 2. The FEIS offers no information on where these tons of emissions will go, over what period, or how ecosystems will absorb and/or dissipate them. 3. The FEIS offers no information on how loss of carbon-absorbing forest resources will affect mitigation period 4. The FEIS recalculation method is not transparent. It apparently assigns major carbon output to concrete manufacturers, and only assigns a small percentage of total industrial output to Sound Transit. 5. Sound Transit has zeroed-out energy required for station operations (including heating, ventilation and air conditioning (HVAC)) because the 60 metric tons of carbon it will annually consume, will be supplied by 100% renewable energy 	<p>Refer to Section 4.6, Air Quality, and Section 4.10, Energy Impacts, of the West Seattle Link Extension Final EIS for air quality and energy analyses. As described in Section 4.6.6.1.2, Construction Emissions, construction emissions were calculated using FTA's Transit Greenhouse Gas Estimator V3.0. . Printouts of the results from this estimator are available in Appendix L4.6E, Greenhouse Gas Analysis. Section 4.6.6.1.2 also discusses the emerging nature of this field of analysis and provides additional context for interpreting these results.</p> <p>Refer to Appendix L4.6E for more information on the greenhouse gas emissions modeling.</p> <p>For more information on Sound Transit's environmental policy and sustainability initiatives, please visit Sound Transit's website at https://www.soundtransit.org/get-to-know-us/environment-sustainability.</p>

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
	<ul style="list-style-type: none"> i. ST will displace 3,001 metric tons of emissions, resulting from people riding light rail and not driving 5.6 million vehicle miles per year in their petroleum fueled cars for the 50 years following WSLE opening in 2032. ii. **Sound Transit's carbon reduction strategy can only succeed by assuming that gasoline fueled cars will outnumber electric cars through 2080. ** iii. Subtracting 60 tons of carbon generated from 3,001 tons displaced yields a net annual carbon reduction of 2,941 tons. 1. Dividing the re-calculated, annualized 140,952 construction tons generated by 2,941 tons per year reduced, yields a payback period of 48 years - until the year 2080, to mitigate WSLE construction carbon. b. The Build option will only reduce car and light truck miles traveled by 0.02% compared to the No Build option (reduction of 15,400 from 85,366,700 vehicles total -Table 4.6-1, "Regional Vehicle Miles Traveled and Average Daily Traffic Change"). The Table shows no reductions in heavy duty truck miles, and 1.3% reduction in bus traffic. c. Sound Transit has not done a proper impact evaluation of light rail alignments vs. other possible modes. This would involve using tools such as the Embodied Carbon in Construction Calculator (EC3) (developed by the nonprofit, Building Transparency) and be conducted in close consultation with objective environmental science organizations like the Carbon Leadership Forum (CLF), a nonprofit, industry- academic organization at the University of Washington. d. The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit's construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 ("An Update on Public Transportation's Impacts on Greenhouse Gas Emissions.") <ul style="list-style-type: none"> • TCRP 226 outlines a "land use effect" of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also Equity below, and Appendix 2. "Station Development...") • The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2.941 tons generated by the methodology Sound Transit uses in the WSLE FEIS. • This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly. 	

Appendix C. Comments Received on the Final EIS and Responses

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	<ul style="list-style-type: none"> • While the DEIS Appendix L4.6 states that "general FTA estimates" have been applied, no federal project the size of WSLE's 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated. e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is. f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle's and King County's goals are to achieve carbon neutrality by 2050. <ul style="list-style-type: none"> • However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won't be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use. • As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day. • Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not. g) The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated. Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from TreePAC.org. Those trees would have absorbed an estimated 64,000 tons of carbon a year (City of Seattle & One tree Planted)- nearly half the carbon output from WSLE construction. 	

From: [Gamboa, Josephine](#)
To: [West Seattle Link Extension](#); [Wu, Phoebe](#)
Subject: FW: Timely Citizen Input for the West Seattle Light Rail Record of Decision
Date: Monday, February 3, 2025 7:07:34 AM
Attachments: [image001.png](#)

FYI

Josephine Gamboa

Program Manager-Board Administration
Executive Department, Sound Transit
Pronouns: she/her
C 206-673-1126



From: Terry Scidmore <tscidmo@gmail.com>
Sent: Saturday, February 1, 2025 6:32 PM
To: DOTExecSec@dot.gov; Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Assam, Mark (FTA) <mark.assam@dot.gov>; Gamboa, Josephine <josephine.gamboa@soundtransit.org>
Subject: Timely Citizen Input for the West Seattle Light Rail Record of Decision

You don't often get email from tscidmo@gmail.com. [Learn why this is important](#)

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the “fish” button in Outlook. Thank you! ST Information Security

I have been following the process for the Light Rail Extension for the West Seattle line for a while now. One concern I have is the environmental damage this construction project would cause, and see no viable way Sound Transit can mitigate the damage. Having attended several of the public meetings Sound Transit has put on, I have found the concerns the attendees voiced about the project have mostly fallen on deaf ears with Sound Transit, the Seattle City Council and Port of Seattle commissioners.

In my uneducated opinion, the RethinkTheLink organization has done a better job of putting together a reader-friendly EIS package that is more complete and provides a better assessment of the West Seattle Light Rail project than the one I read published by Sound Transit. Pages 10-13 of the RethinktheLink EIS summarize the environmental damage the project will likely cause. I find it interesting that some of the biggest backers of the West Seattle Light Rail proposal are also big backers of planting more trees, creating more green space, and promoting "greening up" areas. For some reason, they

seem to ignore the huge environmental impact this project would have to provide a transit option that very few will benefit from while decimating a part of a lower income neighborhood and environmentally sensitive areas to build it. This, on top of ignoring the incredible cost burden and the loss of housing and businesses in the Light Rail path.

One thing I didn't see much mention of in the EIS was the information that Seattle and King County have already published about heat sink areas in lower income neighborhoods. I lived until recently in an area in the southern part of Delridge, where the move to provide more affordable housing encouraged developers to buy up small, single family homes on small lots, tear the homes down, and build "six three story modern townhomes!!!!" on the same lot where one house stood. I watched over a few years as each street lost the small homes with small yards, small lawn areas, with bushes and trees throughout the yard. During the summer, as I was driving back and forth to work because there are no bus connections between my home and where I worked in the south end, I would notice on my car panel the temperature as I drove down the streets. Once the small homes with small yards were torn down and replaced with the three story modern townhomes, surrounded by a concrete walk or driveway, no greenery at all except perhaps a few pots of flowers, or a struggling bush in a container, I noticed the temperature on these street significantly rose as more and more of the small homes were removed. But, I'm not a scientist, so what did I know?

In 2020, Seattle and King County funded a study to map the temperatures of areas around the county. That study, "The Urban Heat Mapping Project", showed what I had been noticing for a few years driving back and forth to work. The maximum temperature on the study day was 98.8 degrees, with a 23.4 degree difference between the highest and the lowest temperatures in the county. The map confirmed that hotter areas across King County are primarily in communities of color, and places where there are more low income and elderly people, with hard surfaces such as buildings, roads, limited vegetation, heat producing factors like car use and industrial activity, and limited vegetation and tree cover. <https://kingcounty.gov/en/dept/executive/governance-leadership/king-county-executive/news/archive/2021/june/23-heat-mapping-results>

Sound Transit is proposing cutting acres of trees, many second and third growth as well as some old growth trees, removing native foliage and flowers, altering wetlands and shorelands, disrupting wildlife trails and the wildlife food chain, disrupting and diverting water movement from rain, runoff, underground springs and water tables, and covering acres of plain old dirt and mud with concrete, while plugging in a few trees and bushes along the way to beautify things. But the end result is the loss of "wild" areas that have been unbuildable in the past because of hillside instability, terrain unsuitability, poor

soils to build on, ground water, poor drainage, and poor neighborhoods where housing development wasn't profitable enough until the push for more affordable housing came along.

The light rail line disrupts the West Seattle Greenway, Pigeon Point Park, a Great Blue Heron rookery, and Longfellow Creek. Along with the environmental loss will be the loss of the wildlife that has been residing there, including birds, mammals, fish, shellfish, insects, and reptiles. There are quite a few neighborhood groups such as Duwamish Alive, Delridge Neighborhoods Development Association, Audubon, and others that have been working for many years to reclaim, rehabilitate, and protect these "natural" areas. They are not doing this just for the 5,400 people who might ride the 4.1 mile track of West Seattle Light Rail, but for the over 82,000 people who live in West Seattle, and the over 32,000 people living in Delridge, most of whom won't be able to ride light rail because there is no efficient way for them to get to Light Rail, or cost effective way for them to afford it.

It is not just the loss of these environmental "wild and natural" areas that matter, but the amount of carbon just building the light rail will bring. "The 146,000 tons of carbon that WSLE construction will generate – reduced from 614,000 tons in the Draft EIS -- plus elimination of and damage to acres of carbon absorbing forest and habitat, will be more than what a short light rail line can mitigate through year 2105" (from the RethinkTheLink EIS). "Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE." (from the RethinkTheLink EIS).

The environmental impacts of this project far outweigh the benefits. There are better transit alternatives that make more sense, and cost less cents.

Thank you for considering a citizen's point of view.

Warm Regards,
Terry Scidmore
8630 10th Ave SW
Seattle, WA 98106

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>One concern I have is the environmental damage this construction project would cause, and see no viable way Sound Transit can mitigate the damage. Having attended several of the public meetings Sound Transit has put on, I have found the concerns the attendees voiced about the project have mostly fallen on deaf ears with Sound Transit, the Seattle City Council and Port of Seattle commissioners.</p> <p>In my uneducated opinion, the RethinkTheLink organization has done a better job of putting together a reader-friendly EIS package that is more complete and provides a better assessment of the West Seattle Light Rail project than the one I read published by Sound Transit. Pages 10-13 of the RethinkTheLink EIS summarize the environmental damage the project will likely cause. I find it interesting that some of the biggest backers of the West Seattle Light Rail proposal are also big backers of planting more trees, creating more green space, and promoting "greening up" areas. For some reason, they seem to ignore the huge environmental impact this project would have to provide a transit option that very few will benefit from while decimating a part of a lower income neighborhood and environmentally sensitive areas to build it. This, on top of ignoring the incredible cost burden and the loss of housing and businesses in the Light Rail path.</p> <p>Sound Transit is proposing cutting acres of trees, many second and third growth as well as some old growth trees, removing native foliage and flowers, altering wetlands and shorelands, disrupting wildlife trails and the wildlife food chain, disrupting and diverting water movement from rain, runoff, underground springs and water tables, and covering acres of plain old dirt and mud with concrete, while plugging in a few trees and bushes along the way to beautify things. But the end result is the loss of "wild" areas that have been unbuildable in the past because of hillside instability, terrain unsuitability, poor soils to build on, ground water, poor drainage, and poor neighborhoods where housing development wasn't profitable enough until the push for more affordable housing came along.</p> <p>The light rail line disrupts the West Seattle Greenway, Pigeon Point Park, a Great Blue Heron rookery, and Longfellow Creek. Along with the environmental loss will be the loss of the wildlife that has been residing there, including birds, mammals, fish, shellfish, insects, and reptiles. There are quite a few neighborhood groups such as Duwamish Alive, Delridge Neighborhoods Development Association, Audubon, and others that have been working for many years to reclaim, rehabilitate, and protect these "natural" areas. They are not doing this just for the 5,400 people who might ride the 4.1 mile track of West Seattle Light Rail, but for the over 82,000 people who live in West Seattle, and the over 32,000 people living in Delridge, most of whom won't be able to ride light rail because there is no efficient way for them to get to Light Rail, or cost effective way for them to afford it.</p> <p>It is not just the loss of these environmental "wild and natural" areas that matter, but the amount of carbon just building the light rail will bring. "The 146,000 tons of carbon that WSLE construction will generate – reduced from 614,000 tons in the Draft EIS – plus elimination of and damage to acres of carbon absorbing forest and habitat, will be more than what a short light rail line can mitigate through year 2105" (from the RethinkTheLink EIS). "Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE." (from the RethinkTheLink EIS).</p> <p>The environmental impacts of this project far outweigh the benefits. There are better transit alternatives that make more sense, and cost less cents.</p>	<p>Your support for the No Build Alternative has been noted.</p> <p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>

Sound Transit Projects

I-90 Jan Roberts

Details	Communication
#559497	From: jan roberts <jan.roberts77@gmail.com> Sent: Monday, February 3, 2025 7:24 AM To: Gamboa, Josephine <josephine.gamboa@soundtransit.org> Subject: Citizen Input for the West Seattle Light Rail Record of Decision, scheduled for release on February 28, 2025
Date Recieved: 2/3/2025	
Created by: Maddie Dewhirst	Citizen Input for the West Seattle Light Rail Record of Decision, scheduled for release on February 28, 2025 Letter to FTA – February 2025
Audience:	I write to urge you not to approve this project.
Type of Draft EIS comment:	In 1996, 2008, and 2016, Sound Transit sold voters on the idea that building a light rail system was the solution to the region's growing transportation needs. The FEIS for West Seattle extension project shows that the agency's rigid adherence to light rail has become the obstacle to considering far more cost-effective alternatives.
Reach:	
Participation:	If the Sound Transit Board insists on viewing the situation as just a budget problem, they will likely discover no good solution. If they broaden their thinking to consider alternatives to light rail, they will find there are vastly superior ways of improving mobility. Rather than directing staff to find new revenue, the Board should request an analysis of lower-cost and lower-risk alternatives. That should include a benefit/cost analysis that provides an objective basis for comparing the options.
Engagement:	
Source: Email	
Assigned division: Outreach	Transit planning should also recognize that many West Seattle residents travel to Renton, South Center, Auburn and Kent. None of those places are served by light rail but all could easily be served by expanded bus service. That would cost only a small fraction of what Sound Transit proposes to spend on the light rail extension, and the service could be added much sooner without having to condemn property, bulldoze homes, and cut down trees, all of which would happen if the preferred light rail project goes forward. Sound Transit, if they were forward thinking, could also begin to plan for ways to improve local circulation and connections to neighborhoods with automated vehicles. The rapid pace of autonomous vehicle development suggests such vehicles may be widely available years before the light rail line would be in service.
Category:	
Project Phase: Planning	
Project Segment: West Seattle and Ballard: West Seattle	A copy of an alternative EIS prepared by Rethink the Link, a group of citizens, including qualified experts in the field who dissent, is attached. https://static1.squarespace.com/static/62fa7817a9f2447f1d8f8c65/t/6736cbcf6b2f507723608d9/1731644367738/RethinkTheLink_Final_EIS-C_v5.1.pdf Please support the No Build option.
Environmental phase:	Jan Roberts 6600 38th Ave SW Seattle, WA 98126 206 920 0130

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>If the Sound Transit Board insists on viewing the situation as just a budget problem, they will likely discover no good solution. If they broaden their thinking to consider alternatives to light rail, they will find there are vastly superior ways of improving mobility. Rather than directing staff to find new revenue, the Board should request an analysis of lower-cost and lower-risk alternatives. That should include a benefit/cost analysis that provides an objective basis for comparing the options.</p>	<p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>
2	<p>Transit planning should also recognize that many West Seattle residents travel to Renton, South Center, Auburn and Kent. None of those places are served by light rail but all could easily be served by expanded bus service. That would cost only a small fraction of what Sound Transit proposes to spend on the light rail extension, and the service could be added much sooner without having to condemn property, bulldoze homes, and cut down trees, all of which would happen if the preferred light rail project goes forward. Sound Transit, if they were forward thinking, could also begin to plan for ways to improve local circulation and connections to neighborhoods with automated vehicles. The rapid pace of autonomous vehicle development suggests such vehicles may be widely available years before the light rail line would be in service.</p>	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p> <p>Please see Chapter 1 of the Final EIS for a description of how the West Seattle Link Extension connects to the regional light rail system, which includes an extension to Federal Way currently under construction that includes stations at Kent/Des Moines, Star Lake, and Federal Way as well as a future connection to Tacoma and north to Everett in planning.</p>

From: Chris Scullin <chrisscullin@hotmail.com>

Sent: Monday, February 3, 2025 7:22 PM

To: DOT Exec Sec (OST) <DOTExecSec@dot.gov>; Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Assam, Mark (FTA) <Mark.Assam@dot.gov>; Josephine.gamboa@soundtransit.org

Subject: Timely Citizen Input for the West Seattle Light Rail Record of Decision, scheduled for February 28, 2025

Some people who received this message don't often get email from chrisscullin@hotmail.com. [Learn why this is important](#)

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

As a public transportation user of 20 years, please consider and respond to my comments regarding Sound Transit WSLE Final EIS

Cost Escalation

Voters approved \$1.5 billion in 2016 for a West Seattle (WSLE) to downtown light rail line that would be build built by 2030 and carry 37,000 riders per day.

- WSLE will now cost \$7 billion, and only connect West Seattle to SODO.
- Connecting WSLE to downtown depends on funding & building the Ballard-downtown line (BLE) with a second downtown light rail tunnel to SODO. Sound Transit has no funding or delivery date for BLE + tunnel.
- With limited income and debt limit, Sound Transit spending more on WSLE means less or no funding and delayed delivery dates for connecting West Seattle to downtown.

Rider Experience Changes

Sound Transit promised that light rail would reduce travel time between West Seattle and downtown and allow Metro to run buses more efficiently.

- Travel times won't improve until BLE tunnel is finished and connected to WSLE. Until then, Metro Transit will continue running the C, H, 21 and other downtown bus services, and won't add any more frequency.
- Also until then, trips will take longer for WSLE light rail riders, as they'll have to transfer 2-3 times between WS and downtown.
- Once WSLE is connected to downtown, most riders will still have to transfer, meaning travel time will still be longer than it is today by bus.

What Voters Approved

In 2016, ST3 proposal gave voters a choice between increasing transit funding or not. They chose to increase transit funding.

- Sound Transit promised bus improvements and a light rail connection between WS and downtown by 2030.
- Sound Transit has dropped the bus improvements and focused on light rail.
- In it June 2016, promised to build light rail to West Seattle, Sound Transit did

not mention that routes had to be studied, assessed and approved first.

Environmental Disaster

- Construction will eliminate acres of Olmstead and Duwamish Tribal legacy forest on Pigeon Point, irreparably damage to critical wildlife habitats, and reduce protections against heat island and global warming effects.
- As it cuts acres of carbon absorbing trees, WSLE construction will generate 380,000 tons of air polluting carbon, more than any carbon savings estimated from running WSLE trains.
- WSLE will not reduce traffic congestion in West Seattle or on the WS bridges.

Better, More Workable Transit Alternatives

- Sound Transit never evaluated light rail vs. other high-capacity transit options on the basis of cost per rider, cost per mile, route flexibility, and impacts to the environment, equity and economy, or best uses of taxpayer funds to increase public transit.
- A wide range of alternatives to WSLE will provide better, more flexible transit for far less than \$7 billion. These include expanding dedicated bus lanes, adding bus services, building bus ramps from the Spokane viaduct to SR99 or the busway, and more.

Thank you,
Chris Scullin
4020 38th Ave SW
Seattle, WA 98126
206.499.7482 cell

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Cost Escalation</p> <p>Voters approved \$1.5 billion in 2016 for a West Seattle (WSLE) to downtown light rail line that would be build built by 2030 and carry 37,000 riders per day.</p> <ul style="list-style-type: none"> • WSLE will now cost \$7 billion, and only connect West Seattle to SODO. • Connecting WSLE to downtown depends on funding & building the Ballard- downtown line (BLE) with a second downtown light rail tunnel to SODO. Sound Transit has no funding or delivery date for BLE + tunnel. • With limited income and debt limit, Sound Transit spending more on WSLE means less or no funding and delayed delivery dates for connecting West Seattle to downtown. 	<p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p> <p>Please see Chapter 2 of the Final EIS for a description of the West Seattle Link Extension connection at SODO Station, which, prior to completion of Ballard Link Extension, provides for a direct transfer to light rail going north into downtown Seattle up to Lynnwood and south to Angle Lake in SeaTac, soon to extend to Federal Way.</p>
2	<p>Rider Experience Changes</p> <p>Sound Transit promised that light rail would reduce travel time between West Seattle and downtown and allow Metro to run buses more efficiently.</p> <ul style="list-style-type: none"> • Travel times won't improve until BLE tunnel is finished and connected to WSLE. Until then, Metro Transit will continue running the C, H, 21 and other downtown bus services, and won't add any more frequency. • Also until then, trips will take longer for WSLE light rail riders, as they'll have to transfer 2-3 times between WS and downtown. • Once WSLE is connected to downtown, most riders will still have to transfer, meaning travel time will still be longer than it is today by bus. 	<p>Chapter 3, Transportation Environment and Consequences, of the Final EIS provides ridership forecasts and travel times.</p>
3	<p>What Voters Approved</p> <p>In 2016, ST3 proposal gave voters a choice between increasing transit funding or not. They chose to increase transit funding.</p> <ul style="list-style-type: none"> • Sound Transit promised bus improvements and a light rail connection between WS and downtown by 2030. • Sound Transit has dropped the bus improvements and focused on light rail. • In it June 2016, promised to build light rail to West Seattle, Sound Transit did not mention that routes had to be studied, assessed and approved first. 	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p>

Appendix C. Comments Received on the Final EIS and Responses

4	<p>Environmental Disaster</p> <ul style="list-style-type: none"> Construction will eliminate acres of Olmstead and Duwamish Tribal legacy forest on Pigeon Point, irreparably damage to critical wildlife habitats, and reduce protections against heat island and global warming effects. As it cuts acres of carbon absorbing trees, WSLE construction will generate 380,000 tons of air polluting carbon, more than any carbon savings estimated from running WSLE trains. WSLE will not reduce traffic congestion in West Seattle or on the WS bridges. 	<p>Your opposition to the West Seattle Link Extension has been noted.</p>
5	<p>Better, More Workable Transit Alternatives</p> <p>Sound Transit never evaluated light rail vs. other high-capacity transit options on the basis of cost per rider, cost per mile, route flexibility, and impacts to the environment, equity and economy, or best uses of taxpayer funds to increase public transit.</p> <p>A wide range of alternatives to WSLE will provide better, more flexible transit for far less than \$7 billion. These include expanding dedicated bus lanes, adding bus services, building bus ramps from the Spokane viaduct to SR99 or the busway, and more.</p>	<p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension.</p>

Sound Transit Projects

I-92 Jan Roberts

Details	Communication
#559756	From jan roberts <jan.roberts77@gmail.com>
Date Recieved: 2/10/2025	Date Sun 2/9/2025 8:00 AM To Gamboa, Josephine <josephine.gamboa@soundtransit.org> Subject: Citizen Input for the West Seattle Light Rail Record of Decision, scheduled for release on February 28, 2025
Created by: Maddie Dewhirst	Good morning, Citizen Input for the West Seattle Light Rail Record of Decision, scheduled for release on February 28, 2025 Letter to FTA – February 2025 I write to urge you not to approve this project.
Audience:	
Type of Draft	High Costs and Financial Burden:
EIS comment:	The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects, with questionable financial sustainability.
Reach:	Please support the No Build option.
Participation:	
Engagement:	Jan Roberts 6600 38th Ave SW
Source:	Seattle, WA 98126
Email	206 920 0130 and Responsible No Build Option:
Assigned division:	The Sound Transit Board has the authority to choose the No Build option, which is a legitimate and responsible choice under federal and state law and would avoid the negative impacts of WSLE.
Outreach	
Category:	
Project Phase:	
Planning	
Project Segment:	
West Seattle and Ballard:	
West Seattle	
Environmental phase:	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I write to urge you not to approve this project.</p> <p>High Costs and Financial Burden:</p> <p>The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects, with questionable financial sustainability.</p> <p>Please support the No Build option.</p>	<p>Your support for the No Build Alternative has been noted.</p>

Sound Transit Projects

I-93 Jan Roberts

Details	Communication
#559757	From jan roberts <jan.roberts77@gmail.com> Date Sun 2/9/2025 8:02 AM To Gamboa, Josephine <josephine.gamboa@soundtransit.org> Subject: Citizen Input for the West Seattle Light Rail Record of Decision, scheduled for release on February 28, 2025
Date Recieved: 2/10/2025	
Created by: Maddie Dewhirst	Good morning, Citizen Input for the West Seattle Light Rail Record of Decision, scheduled for release on February 28, 2025 Letter to FTA – February 2025
Audience:	I write to urge you not to approve this project.
Type of Draft EIS comment:	Better Alternatives Available: Lower carbon, less expensive, and less destructive public transit options, such as bus lane expansions and electrification of the bus fleet, are available and could serve West Seattle riders more effectively than WSLE.
Reach:	
Participation:	Please support the No Build option.
Engagement:	
Source: Email	Jan Roberts 6600 38th Ave SW Seattle, WA 98126 206 920 0130
Assigned division: Outreach	
Category:	
Project Phase: Planning	
Project Segment: West Seattle and Ballard: West Seattle	
Environmental phase:	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I write to urge you not to approve this project.</p> <p>Better Alternatives Available:</p> <p>Lower carbon, less expensive, and less destructive public transit options, such as bus lane expansions and electrification of the bus fleet, are available and could serve West Seattle riders more effectively than WSLE.</p> <p>Please support the No Build option.</p>	<p>Your support for the No Build Alternative has been noted.</p>

Details	Communication
#559758	From jan roberts <jan.roberts77@gmail.com>
Date Recieved: 2/10/2025	Date Sun 2/9/2025 8:16 AM To Gamboa, Josephine <josephine.gamboa@soundtransit.org> Subject: Citizen Input for the West Seattle Light Rail Record of Decision, scheduled for release on February 28, 2025
Created by: Maddie Dewhirst	Citizen Input for the West Seattle Light Rail Record of Decision, scheduled for release on February 28, 2025 Letter to FTA – February 2025
Audience:	This project does no fit within the scope of U.S. Transportation Secretary Sean Duffy's plan to grant money for highways and new transit projects based, in part, on which communities have higher marriage and birth rates.
Type of Draft EIS comment:	
Reach:	Seattle has one of the lowest birth rates among major U.S. cities. In 2022, the birth rate in Seattle was** 2.6%***, which is significantly lower than the national average. Additionally, Seattle also has one of the smallest average family sizes , with about 2.78
Participation:	people per family . In contrast, cities
Engagement:	like Indianapolis and several Texas cities (e.g., Dallas, El Paso, San Antonio, and Houston) have much higher birth rates, with percentages ranging from 5.6% to 6.5% . These cities also tend to have larger average family sizes.
Source: Email	Jan Roberts
Assigned division:	6600 38th Ave SW Seattle, WA 98126
Outreach	206 920 0130
Category:	
Project Phase: Planning	
Project Segment:	
West Seattle and Ballard: West Seattle	
Environmental phase:	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>This project does not fit within the scope of U.S. Transportation Secretary Sean Duffy's plan to grant money for highways and new transit projects based, in part, on which communities have higher marriage and birth rates.</p> <p>Seattle has one of the lowest birth rates among major U.S. cities. In 2022, the birth rate in Seattle was** 2.6%**, which is significantly lower than the national average. Additionally, Seattle also has one of the smallest average family sizes, with about 2.78 people per family. In contrast, cities like Indianapolis and several Texas cities (e.g., Dallas, El Paso, San Antonio, and Houston) have much higher birth rates, with percentages ranging from 5.6% to 6.5%. These cities also tend to have larger average family sizes.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>

Details	Communication
#559759	From: Marilyn Kennell <mkennell@gmail.com>
Date Recieved: 2/11/2025	Sent: Monday, February 10, 2025 2:08 PM To: DOTExecSec@dot.gov Cc: Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Assam, Mark (FTA) <mark.assam@dot.gov>; Gamboa, Josephine <josephine.gamboa@soundtransit.org> Subject: Citizen Comment for the West Seattle Light Rail Record of Decision, scheduled for release February 28, 2025
Created by: Maddie Dewhirst	The US Department of Transportation should not fund the Sound Transit West Seattle Link Extension light rail project. The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects, with questionable financial sustainability.
Audience:	Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016, allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.
Type of Draft	
EIS comment:	The Sound Transit Board can and should choose the No Build option for the WSLE.
Reach:	Marilyn Kennell
Participation:	
Engagement:	West Seattle mkennell@gmail.com
Source: Email	
Assigned division: Outreach	
Category:	
Project Phase: Planning	
Project Segment: West Seattle and Ballard: West Seattle	
Environmental phase:	

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>The US Department of Transportation should not fund the Sound Transit West Seattle Link Extension light rail project. The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects, with questionable financial sustainability. Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016, allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.</p> <p>The Sound Transit Board can and should choose the No Build option for the WSLE.</p>	<p>Your support for the No Build Option has been noted.</p>

Details	Communication
#560073	From: Marilyn Kennel <mkennell@gmail.com>
Date Recieved: 2/11/2025	Sent: Tuesday, February 11, 2025 3:14 PM To: claudia.balducci@kingcounty.gov Cc: kroscoe@cityoffife.org; nbackus@auburnwa.gov; mayor@redmond.gov; CFranklin <CFranklin@everettwa.gov>; bruce.harrell@seattle.gov; Dan.Strauss@seattle.gov; Somers, Dave J <Dave.Somers@co.snohomish.wa.us>
Created by: Maddie Dewhirst	Subject: Vote No on Resolution No. R2025-03
Audience:	Sound Transit
Type of Draft EIS comment:	System Expansion Committee Meeting
Reach:	Thursday, February 13, 2025
Participation:	1:30 p.m. to 4:00 p.m.
Engagement:	A recommendation to the committee regarding
Source: Email	Resolution No. R2025-03: Authorizing the chief executive officer to acquire certain real property interests, contingent on receipt of any necessary federal approvals, including acquisition by condemnation to the extent authorized by law, and to reimburse eligible relocation and reestablishment expenses incurred by affected owners and tenants as necessary for the West Seattle Link Extension project.
Assigned division: Outreach	Vote No on Resolution No. R2025-03
Category: Administrative: Elected Official CC'd	Whereas, The US Department of Transportation may not fund the Sound Transit West Seattle Link Extension light rail project.
Project Phase: Planning	From PBS News, February 7, 2025, "Shortly after he was confirmed as President Donald Trump's transportation secretary, Sean Duffy circulated a memo that instructed his department to prioritize families by, among other things, giving preference to communities with marriage and birth rates higher than the national average when awarding grants."
Project Segment: West Seattle and Ballard: West Seattle	Whereas, The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects with questionable financial sustainability. Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016 allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.
Environmental phase:	Whereas, The environmental analysis of viable alternatives, e.g., bus service, was NOT included in the EIS. The federally required No build option was not seriously considered. The environmental process is therefore incomplete.
	Whereas, Sound Transit has already cut 14,000 trees between North and South King County, which prevents King County and the city of Seattle from reaching their tree canopy coverage goals. West Seattle houses about 1/3 of our regional tree canopy, but according to Sound Transit West Seattle Link Extension light rail plans, Sound Transit intends to carve off Pigeon Point at the north end of the West Duwamish Green Belt, deforesting 2-3 acres of trees. Mitigation of the acknowledged, impending destruction of beaver, heron, and salmon habitats is vague or non-existent. Nobody is holding Sound Transit accountable for that or for the significant carbon footprint that will be left behind by the demolition and construction activities incurred building light rail tracks. WSLE light rail will prevent the state from meeting 2050 carbon neutrality goals under the Washington Climate Commitment Act.
	Meanwhile, Taxpayers are waking up! The average household previously paid \$1780 in property tax, sales tax, and license tabs—that figure is going up. Pierce, King, and Snohomish residents are increasingly angry about Sound Transit projects being over budget and years behind schedule.
	Voting no on Resolution No. R2025-03 would be a financial win for the Sound Transit board and regional taxpayers. It will save West Seattle from the irreparable, permanent damage to its human and natural habitats that Sound Transit acknowledges in its ST WSLE 2022 DEIS. Voting to stop this boondoggle could positively impact your political future.
	The Sound Transit Systems Expansion Committee should vote NO on Resolution No. R2025-03
	Marilyn Kennel
	West Seattle mkennell@gmail.com

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>Vote No on Resolution No. R2025-03</p> <p>Whereas, The US Department of Transportation may not fund the Sound Transit West Seattle Link Extension light rail project.</p> <p>From PBS News, February 7, 2025, "Shortly after he was confirmed as President Donald Trump's transportation secretary, Sean Duffy circulated a memo that instructed his department to prioritize families by, among other things, giving preference to communities with marriage and birth rates higher than the national average when awarding grants."</p> <p>Whereas, The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects with questionable financial sustainability. Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016 allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.</p> <p>Whereas, The environmental analysis of viable alternatives, e.g., bus service, was NOT included in the EIS. The federally required No build option was not seriously considered. The environmental process is therefore incomplete.</p> <p>Whereas, Sound Transit has already cut 14,000 trees between North and South King County, which prevents King County and the city of Seattle from reaching their tree canopy coverage goals. West Seattle houses about 1/3 of our regional tree canopy, but according to Sound Transit West Seattle Link Extension light rail plans, Sound Transit intends to carve off Pigeon Point at the north end of the West Duwamish Green Belt, deforesting 2-3 acres of trees. Mitigation of the acknowledged, impending destruction of beaver, heron, and salmon habitats is vague or non-existent. Nobody is holding Sound Transit accountable for that or for the significant carbon footprint that will be left behind by the demolition and construction activities incurred building light rail tracks. WSLE light rail will prevent the state from meeting 2050 carbon neutrality goals under the Washington Climate Commitment Act.</p> <p>Meanwhile, Taxpayers are waking up! The average household previously paid \$1780 in property tax, sales tax, and license tabs—that figure is going up. Pierce, King, and Snohomish residents are increasingly angry about Sound Transit projects being over budget and years behind schedule.</p> <p>Voting no on Resolution No. R2025-03 would be a financial win for the Sound Transit board and regional taxpayers. It will save West Seattle from the irreparable, permanent damage to its human and natural habitats that Sound Transit acknowledges in its ST WSLE 2022 DEIS. Voting to stop this boondoggle could positively impact your political future.</p> <p>The Sound Transit Systems Expansion Committee should vote NO on Resolution No. R2025-03</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension.</p>

Details	Communication
#560077	From: johnvick@comcast.net <johnvick@comcast.net>
Date Recieved: 2/12/2025	Sent: Wednesday, February 12, 2025 11:24 AM To: claudia.balducci@kingcounty.gov; kroscoe@cityofffe.org; nbackus@auburnwa.gov; mayor@redmond.gov; CFranklin <CFranklin@everettwa.gov>; bruce.harrell@seattle.gov; Dan.Strauss@seattle.gov; Somers, Dave J <Dave.Somers@co.snohomish.wa.us> Subject: Resolution No. R2025-03
Created by: Maddie Dewhirst	I totally agree with Marilyn's written position below and want to add that at this time, we cannot assume that the federal government will provide financial assistance to offset the extraordinarily high costs to bring light rail to West Seattle.
Audience:	Until we have confirmation that the additional money will be available to complete the WS link, any further work should be put on hold. Voting NO at this time will allow these outstanding issues to be addressed.
Type of Draft EIS comment:	Resolution No. R2025-03: Authorizing the chief executive officer to acquire certain real property interests, contingent on receipt of any necessary federal approvals, including acquisition by condemnation to the extent authorized by law, and to reimburse eligible relocation and reestablishment expenses incurred by affected owners and tenants as necessary for the West Seattle Link Extension project.
Reach:	
Participation:	
Engagement:	Vote No on Resolution No. R2025-03 -Author Marilyn Kennell
Source: Email	Whereas, The US Department of Transportation may not fund the Sound Transit West Seattle Link Extension light rail project.
Assigned division: Outreach	From PBS News, February 7, 2025, "Shortly after he was confirmed as President Donald Trump's transportation secretary, Sean Duffy circulated a memo that instructed his department to prioritize families by, among other things, giving preference to communities with marriage and birth rates higher than the national average when awarding grants."
Category: Administrative: Elected Official CC'd	Whereas, The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects with questionable financial sustainability. Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016 allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.
Project Phase:	Whereas, The environmental analysis of viable alternatives, e.g., bus service, was NOT included in the EIS. The federally required No build option was not seriously considered. The environmental process is therefore incomplete.
Project Segment: West Seattle and Ballard: West Seattle	Whereas, Sound Transit has already cut 14,000 trees between North and South King County, which prevents King County and the city of Seattle from reaching their tree canopy coverage goals. West Seattle houses about 1/3 of our regional tree canopy, but according to Sound Transit West Seattle Link Extension light rail plans, Sound Transit intends to carve off Pigeon Point at the north end of the West Duwamish Green Belt, deforesting 2-3 acres of trees. Mitigation of the acknowledged, impending destruction of beaver, heron, and salmon habitats is vague or non-existent. Nobody is holding Sound Transit accountable for that or for the significant carbon footprint that will be left behind by the demolition and construction activities incurred building light rail tracks. WSLE light rail will prevent the state from meeting 2050 carbon neutrality goals under the Washington Climate Commitment Act.
Environmental phase:	Meanwhile, Taxpayers are waking up! The average household previously paid \$1780 in property tax, sales tax, and license tabs—that figure is going up. Pierce, King, and Snohomish residents are increasingly angry about Sound Transit projects being over budget and years behind schedule. Voting no on Resolution No. R2025-03 would be a financial win for the Sound Transit board and regional taxpayers. It will save West Seattle from the irreparable, permanent damage to its human and natural habitats that Sound Transit acknowledges in its ST WSLE 2022 DEIS. Voting to stop this boondoggle could positively impact your political future. The Sound Transit Systems Expansion Committee should vote NO on Resolution No. R2025-03 VN / JM John McNulty Victoria Nelson Seattle, Washington 98136

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>I totally agree with Marilyn's written position below and want to add that at this time, we cannot assume that the federal government will provide financial assistance to offset the extraordinarily high costs to bring light rail to West Seattle.</p> <p>Until we have confirmation that the additional money will be available to complete the WS link, any further work should be put on hold. Voting NO at this time will allow these outstanding issues to be addressed.</p>	<p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p>
2	<p>Vote No on Resolution No. R2025-03</p> <p>Whereas, The US Department of Transportation may not fund the Sound Transit West Seattle Link Extension light rail project.</p> <p>From PBS News, February 7, 2025, "Shortly after he was confirmed as President Donald Trump's transportation secretary, Sean Duffy circulated a memo that instructed his department to prioritize families by, among other things, giving preference to communities with marriage and birth rates higher than the national average when awarding grants."</p> <p>Whereas, The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects with questionable financial sustainability. Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016 allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.</p> <p>Whereas, The environmental analysis of viable alternatives, e.g., bus service, was NOT included in the EIS. The federally required No build option was not seriously considered. The environmental process is therefore incomplete.</p> <p>Whereas, Sound Transit has already cut 14,000 trees between North and South King County, which prevents King County and the city of Seattle from reaching their tree canopy coverage goals. West Seattle houses about 1/3 of our regional tree canopy, but according to Sound Transit West Seattle Link Extension light rail plans, Sound Transit intends to carve off Pigeon Point at the north end of the West Duwamish Green Belt, deforesting 2-3 acres of trees. Mitigation of the acknowledged, impending destruction of beaver, heron, and salmon habitats is vague or non-existent. Nobody is holding Sound Transit accountable for that or for the significant carbon footprint that will be left behind by the demolition and construction activities incurred building light rail tracks. WSLE light rail will prevent the state from</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension.</p>

Appendix C. Comments Received on the Final EIS and Responses

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	<p>meeting 2050 carbon neutrality goals under the Washington Climate Commitment Act.</p> <p>Meanwhile, Taxpayers are waking up! The average household previously paid \$1780 in property tax, sales tax, and license tabs—that figure is going up. Pierce, King, and Snohomish residents are increasingly angry about Sound Transit projects being over budget and years behind schedule.</p> <p>Voting no on Resolution No. R2025-03 would be a financial win for the Sound Transit board and regional taxpayers. It will save West Seattle from the irreparable, permanent damage to its human and natural habitats that Sound Transit acknowledges in its ST WSLE 2022 DEIS. Voting to stop this boondoggle could positively impact your political future.</p> <p>The Sound Transit Systems Expansion Committee should vote NO on Resolution No. R2025-03</p>	

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Details	Communication
#560078	From: Terry Scidmore <tscidmo@gmail.com> Sent: Wednesday, February 12, 2025 1:31 PM To: claudia.balducci@kingcounty.gov; nbackus@auburnwa.gov; mayor@redmond.gov; CFranklin <CFranklin@everettwa.gov>; bruce.harrell@seattle.gov; Dan.Strauss@seattle.gov; Somers, Dave J <Dave.Somers@co.snohomish.wa.us> Subject: Resolution No. R2025-03
Date Received: 2/20/2025	
Created by: Maddie Dewhirst	I have been attending the ST meetings about the West Seattle Link Extension project and I am dismayed at how Sound Transit has dropped the ball in so many ways. The last meeting I attended (January 25, 2025 at the Senior Center in West Seattle) Sound Transit didn't even bother to show up. I have also sent emails about the project, and have found that some ST members, some City of Seattle council members, and some Port of Seattle commissioners simply block an email with the subject line: West Seattle Light Rail. It appears to me that Sound Transit is an independent taxing agency allowed to do whatever it likes, with very little interest or concern for how what they are doing affects individuals, neighborhoods, communities, the environment, and the pocket book. I am forwarding a letter about resolution no. R2025-03 that Marilyn Kennell has written that I think is a great summary and worth strong consideration in your vote. I am also attaching a letter I sent after the January 25 meeting where the panel gave a very balanced and informed presentation about the pros and cons of the West Seattle Light Rail project. The West Seattle Light Rail project doesn't make sense, or cents, on any level. And BTW, no email address I tried seems to work to get an email to Kim Roscoe, Mayor of Fife.
Audience:	
Type of Draft EIS comment:	
Reach:	
Participation:	
Engagement:	
Source: Email	Best, Terry Scidmore 8630 10th Ave SW Seattle, WA 98106
Assigned division:	
Category: Administrative: Elected Official CC'd	Sound Transit System Expansion Committee Meeting Thursday, February 13, 2025 1:30 p.m. to 4:00 p.m.
Project Phase: Planning	A recommendation to the committee regarding
Project Segment: West Seattle and Ballard: West Seattle	Resolution No. R2025-03: Authorizing the chief executive officer to acquire certain real property interests, contingent on receipt of any necessary federal approvals, including acquisition by condemnation to the extent authorized by law, and to reimburse eligible relocation and reestablishment expenses incurred by affected owners and tenants as necessary for the West Seattle Link Extension project. Vote No on Resolution No. R2025-03
Environmental phase:	Whereas, The US Department of Transportation may not fund the Sound Transit West Seattle Link Extension light rail project. From PBS News, February 7, 2025, "Shortly after he was confirmed as President Donald Trump's transportation secretary, Sean Duffy circulated a memo that instructed his department to prioritize families by, among other things, giving preference to communities with marriage and birth rates higher than the national average when awarding grants." Whereas, The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects with questionable financial sustainability. Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016 allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote. Whereas, The environmental analysis of viable alternatives, e.g., bus service, was NOT included in the EIS. The federally required No build option was not seriously considered. The environmental process is therefore incomplete. Whereas, Sound Transit has already cut 14,000 trees between North and South King County, which prevents King County and the city of Seattle from reaching their tree canopy coverage goals. West Seattle houses about 1/3 of our regional tree canopy, but according to Sound Transit West Seattle Link Extension light rail plans, Sound Transit intends to carve off Pigeon Point at the north end of the West Duwamish Green Belt, deforesting 2-3 acres of trees. Mitigation of the acknowledged, impending destruction of beaver, heron, and salmon habitats is vague or non-existent. Nobody is holding Sound Transit accountable for that or for the significant carbon footprint that will be left behind by the demolition and construction activities incurred building light rail tracks. WSLE light rail will prevent the state from meeting 2050 carbon neutrality goals under the Washington Climate Commitment Act. Meanwhile, Taxpayers are waking up! The average household previously paid \$1780 in property tax, sales tax, and license tabs—that figure is going up. Pierce, King, and Snohomish residents are increasingly angry about Sound Transit projects being over budget and years behind schedule. Voting no on Resolution No. R2025-03 would be a financial win for the Sound Transit board and regional taxpayers. It will save West Seattle from the irreparable, permanent damage to its human and natural habitats that Sound Transit acknowledges in its ST WSLE 2022 DEIS. Voting to stop this boondoggle could positively impact your political future. The Sound Transit Systems Expansion Committee should vote NO on Resolution No. R2025-03 Marilyn Kennell West Seattle ? Terry Scidmore <tscidmo@gmail.com> Sat, Feb 1, 6:31 PM (11 days ago) I have been following the process for the Light Rail Extension for the West Seattle line for a while now. One concern I have is the environmental damage this construction project would cause, and see no viable way Sound Transit can mitigate the damage. Having attended several of the public meetings Sound Transit has put on, I have found the concerns the attendees voiced about the project have mostly fallen on deaf ears with Sound Transit, the Seattle City Council and Port of Seattle commissioners.

Details

Communication

In my uneducated opinion, the RethinkTheLink organization has done a better job of putting together a reader-friendly EIS package that is more complete and provides a better assessment of the West Seattle Light Rail project than the one I read published by Sound Transit. Pages 10-13 of the RethinktheLink EIS summarize the environmental damage the project will likely cause. I find it interesting that some of the biggest backers of the West Seattle Light Rail proposal are also big backers of planting more trees, creating more green space, and promoting "greening up" areas. For some reason, they seem to ignore the huge environmental impact this project would have to provide a transit option that very few will benefit from while decimating a part of a lower income neighborhood and environmentally sensitive areas to build it. This, on top of ignoring the incredible cost burden and the loss of housing and businesses in the Light Rail path.

One thing I didn't see much mention of in the EIS was the information that Seattle and King County have already published about heat sink areas in lower income neighborhoods. I lived until recently in an area in the southern part of Delridge, where the move to provide more affordable housing encouraged developers to buy up small, single family homes on small lots, tear the homes down, and build "six three story modern townhomes!!!!" on the same lot where one house stood. I watched over a few years as each street lost the small homes with small yards, small lawn areas, with bushes and trees throughout the yard. During the summer, as I was driving back and forth to work because there are no bus connections between my home and where I worked in the south end, I would notice on my car panel the temperature as I drove down the streets. Once the small homes with small yards were torn down and replaced with the three story modern townhomes, surrounded by a concrete walk or driveway, no greenery at all except perhaps a few pots of flowers, or a struggling bush in a container, I noticed the temperature on these street significantly rose as more and more of the small homes were removed. But, I'm not a scientist, so what did I know?

In 2020, Seattle and King County funded a study to map the temperatures of areas around the county. That study, "The Urban Heat Mapping Project", showed what I had been noticing for a few years driving back and forth to work. The maximum temperature on the study day was 98.8 degrees, with a 23.4 degree difference between the highest and the lowest temperatures in the county. The map confirmed that hotter areas across King County are primarily in communities of color, and places where there are more low income and elderly people, with hard surfaces such as buildings, roads, limited vegetation, heat producing factors like car use and industrial activity, and limited vegetation and tree cover. <https://kingcounty.gov/en/dept/executive/governance-leadership/king-county-executive/news/archive/2021/june/23-heat-mapping-results>

Sound Transit is proposing cutting acres of trees, many second and third growth as well as some old growth trees, removing native foliage and flowers, altering wetlands and shorelands, disrupting wildlife trails and the wildlife food chain, disrupting and diverting water movement from rain, runoff, underground springs and water tables, and covering acres of plain old dirt and mud with concrete, while plugging in a few trees and bushes along the way to beautify things. But the end result is the loss of "wild" areas that have been unbuildable in the past because of hillside instability, terrain unsuitability, poor soils to build on, ground water, poor drainage, and poor neighborhoods where housing development wasn't profitable enough until the push for more affordable housing came along.

The light rail line disrupts the West Seattle Greenway, Pigeon Point Park, a Great Blue Heron rookery, and Longfellow Creek. Along with the environmental loss will be the loss of the wildlife that has been residing there, including birds, mammals, fish, shellfish, insects, and reptiles. There are quite a few neighborhood groups such as Duwamish Alive, Delridge Neighborhoods Development Association, Audubon, and others that have been working for many years to reclaim, rehabilitate, and protect these "natural" areas. They are not doing this just for the 5,400 people who might ride the 4.1 mile track of West Seattle Light Rail, but for the over 82,000 people who live in West Seattle, and the over 32,000 people living in Delridge, most of whom won't be able to ride light rail because there is no efficient way for them to get to Light Rail, or cost effective way for them to afford it.

It is not just the loss of these environmental "wild and natural" areas that matter, but the amount of carbon just building the light rail will bring. "The 146,000 tons of carbon that WSLE construction will generate – reduced from 614,000 tons in the Draft EIS – plus elimination of and damage to acres of carbon absorbing forest and habitat, will be more than what a short light rail line can mitigate through year 2105" (from the RethinkTheLink EIS). "Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE." (from the RethinkTheLink EIS).

The environmental impacts of this project far outweigh the benefits. There are better transit alternatives that make more sense, and cost less cents.

Thank you for considering a citizen's point of view.

Warm Regards,

Terry Scidmore
8630 10th Ave SW
Seattle, WA 98106

Appendix C. Comments Received on the Final EIS and Responses

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1	<p>It appears to me that Sound Transit is an independent taxing agency allowed to do whatever it likes, with very little interest or concern for how what they are doing affects individuals, neighborhoods, communities, the environment, and the pocket book. I am forwarding a letter about resolution no. R2025-03 that Marilyn Kennell has written that I think is a great summary and worth strong consideration in your vote. I am also attaching a letter I sent after the January 25 meeting where the panel gave a very balanced and informed presentation about the pros and cons of the West Seattle Light Rail project. The West Seattle Light Rail project doesn't make sense, or cents, on any level.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p>
2	<p>Vote No on Resolution No. R2025-03</p> <p>Whereas, The US Department of Transportation may not fund the Sound Transit West Seattle Link Extension light rail project.</p> <p>From PBS News, February 7, 2025, "Shortly after he was confirmed as President Donald Trump's transportation secretary, Sean Duffy circulated a memo that instructed his department to prioritize families by, among other things, giving preference to communities with marriage and birth rates higher than the national average when awarding grants."</p> <p>Whereas, The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects with questionable financial sustainability. Section 2, Paragraph 3 of the ST3 ballot proposition that voters approved in 2016 allows the board to reconsider and make adjustments to projects that are unaffordable, infeasible, or impracticable for any reason. The WSLE is all three. This action does not require a public vote.</p> <p>Whereas, The environmental analysis of viable alternatives, e.g., bus service, was NOT included in the EIS. The federally required No build option was not seriously considered. The environmental process is therefore incomplete.</p> <p>Whereas, Sound Transit has already cut 14,000 trees between North and South King County, which prevents King County and the city of Seattle from reaching their tree canopy coverage goals. West Seattle houses about 1/3 of our regional tree canopy, but according to Sound Transit West Seattle Link Extension light rail plans, Sound Transit intends to carve off Pigeon Point at the north end of the West Duwamish Green Belt, deforesting 2-3 acres of trees. Mitigation of the acknowledged, impending destruction of beaver, heron, and salmon habitats is vague or non-existent. Nobody is holding Sound Transit accountable for that or for the significant carbon footprint that will be left behind by the demolition and construction activities incurred building light rail tracks. WSLE light rail will prevent the state from meeting 2050 carbon neutrality goals under the Washington Climate Commitment Act.</p> <p>Meanwhile, Taxpayers are waking up! The average household previously paid \$1780 in property tax, sales tax, and license tabs—that figure is going up. Pierce, King, and Snohomish residents are increasingly angry about Sound Transit projects being over budget and years behind schedule.</p> <p>Voting no on Resolution No. R2025-03 would be a financial win for the Sound Transit board and regional taxpayers. It will save West Seattle from the irreparable, permanent damage to its human and natural habitats that Sound Transit acknowledges in its ST WSLE 2022 DEIS. Voting to stop this boondoggle could positively impact your political future.</p> <p>The Sound Transit Systems Expansion Committee should vote NO on Resolution No. R2025-03</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension.</p>

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From: [Assam, Mark \(FTA\)](#)
To: [Fletcher, Susan \(FTA\)](#); [Rastelli, Scot \(FTA\)](#); [Jones, Heather \(FTA\)](#); [Tillinger, Todd \(FTA\)](#); [Remington, Barney \(FTA\)](#); [Montgomery, Mark \(FTA\)](#)
Subject: FW: West Seattle Light Rail - Record of Decision - February 28, 2025
Date: Wednesday, February 19, 2025 9:08:45 AM

FYI...

Mark Assam
(206) 220-4465

From: Marilyn Kennell <mkennell@gmail.com>
Sent: Wednesday, February 19, 2025 9:05 AM
To: Assam, Mark (FTA) <Mark.Assam@dot.gov>; DOT Exec Sec (OST) <DOTExecSec@dot.gov>
Subject: West Seattle Light Rail - Record of Decision - February 28, 2025

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Secretary Duffy,

We are sickened by the gross cost overrun of Sound Transit's West Seattle Link Extension light rail project. It has gone from \$1.7 billion to over \$7 billion and it is still in the design phase. We are aware that the lack of a Modal Alternative Analysis and a Major Investment Analysis environmental review have not been done and will undermine the FEIS conclusions. Our worry is that Sound Transit will start bulldozing before the FTA funds the project, and then use the "sunk cost fallacy" to get more and more federal money. Please tell the FTA NOT to issue the Record of Decision planned for February 28, 2025 and save taxpayers a quick \$7 billion.

Respectfully,

Marilyn Kennell
West Seattle
mkennell@gmail.com

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	<p>We are sickened by the gross cost overrun of Sound Transit's West Seattle Link Extension light rail project. It has gone from \$1.7 billion to over \$7 billion and it is still in the design phase. We are aware that the lack of a Modal Alternative Analysis and a Major Investment Analysis environmental review have not been done and will undermine the FEIS conclusions. Our worry is that Sound Transit will start bulldozing before the FTA funds the project, and then use the "sunk cost fallacy" to get more and more federal money. Please tell the FTA NOT to issue the Record of Decision planned for February 28, 2025 and save taxpayers a quick \$7 billion.</p>	<p>Your opposition to the West Seattle Link Extension has been noted.</p> <p>On October 24, 2024, the Sound Transit Board selected the preferred alternative as the project to be built for the West Seattle Link Extension, a step to completing the environmental review phase and allowing the project to proceed into the final design phase. This decision includes the light rail route, profile, and station locations and was based on years of technical analysis and community feedback, including study of multiple routes and station alternatives. During final design, Sound Transit will develop and implement a work plan to improve the agency's financial situation and to inform a financially sound project to be baselined.</p> <p>The West Seattle Link Extension project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016. The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode was identified as light rail.</p> <p>Refer to Chapter 1, Purpose and Need, of the West Seattle Link Extension Final Environmental Impact Statement (EIS) for more information on the planning history and the purpose and need for the West Seattle Link Extension.</p>

From: Sharon Price <jasprice@isomedia.com>
Sent: Sunday, March 30, 2025 11:20 AM
To: Assam, Mark (FTA) <Mark.Assam@dot.gov>
Subject: no to light rail in W. Seattle

You don't often get email from jasprice@isomedia.com. [Learn why this is important](#)

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If this is a repeat, I'm sorry, but I really want to get my message across that the light rail is too costly in dollars, homes, businesses, and the old growth Duwamish Greenbelt with its heron rookery. When we voted in 2016 it was to be 2 bil. and we had no idea the size scope and sacrifices that it would cause. Now we know, and the gains are not worth the cost. We need the housing and the trees it would take at great expense in production with fossil fuel byproducts that we don't need either.

Sharon Price
W. Seattle

Appendix C. Comments Received on the Final EIS and Responses

#	Comments	Responses
1	If this is a repeat, I'm sorry, but I really want to get my message across that the light rail is too costly in dollars, homes, businesses, and the old growth Duwamish Greenbelt with its heron rookery. When we voted in 2016 it was to be 2 bil. and we had no idea the size scope and sacrifices that it would cause. Now we know, and the gains are not worth the cost. We need the housing and the trees it would take at great expense in production with fossil fuel byproducts that we don't need either.	Your opposition to the West Seattle Link Extension has been noted.

Appendix C- Individuals- Non-Substantive Comments

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Voicing my continuing support for the Avalon Station

From Mike Monteleone <mike.monteleone@gmail.com>

Date Fri 9/20/2024 7:03 PM

To West Seattle Link Extension <westseattlelink@soundtransit.org>

You don't often get email from mike.monteleone@gmail.com. [Learn why this is important](#)

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I believe the silent majority of WS residents support light rail and an Avalon Station. Questioning cost over-runs is understandable, however, almost every large project of this size has them. The shrill vocal minority should be seen as the NIMBYism factor present in most communities. Let's move forward towards a better transportation future.

Michael A Monteleone

(A resident living a half block from projected Avalon Station)

Re: In Support of WSLE

From West Seattle Link Extension <westseattlelink@soundtransit.org>

Date Wed 10/2/2024 8:52 AM

To Debora Robinett <drobinett@msn.com>

Thank you for your email. We have received your feedback and appreciate your continued engagement with the West Seattle Link Extension project.

Please visit our [project website](#) and [sign up for email updates](#) to stay connected with us and learn about upcoming project milestones.

Sincerely,
The West Seattle Link Extension team

West Seattle Link Extension
Sound Transit
tel 206-903-7229

Connect with us
soundtransit.org/wslink
facebook.com/SoundTransit
twitter.com/SoundTransit



From: Debora Robinett <drobinett@msn.com>

Sent: Friday, September 27, 2024 12:30 PM

To: West Seattle Link Extension <westseattlelink@soundtransit.org>

Subject: In Support of WSLE

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I am a senior citizen and resident of West Seattle since 2017 and live very close to the proposed Avalon Station. As a former resident of Chicago and frequent traveler to London, Copenhagen, Paris and NYC, Seattle is long overdue for light rail.

I understand that homeowner and businesses are concerned about losing their properties but once the project is completed, much-needed, new, multi-family and businesses return. The three station designs are beautiful and functional and living near any of the three further enhances property values and the city esthetics. Our city is very late to the light rail table and of course, delays and construction costs rise with each delay.

I voted YES and am among the thousands of voters who want light rail ASAP, especially to West Seattle. It is unfortunate that most communications to Sound Transit are from the 'NO Build" naysayers.

I am hopeful that the Executive Committee votes YES at their October meeting to further the construction of the Preferred Route as summarized in the FEIS.

Sincerely,

Debora A. Robinett
3202 SW Avalon Way
#402
Seattle, WA 98126
(253) 279-2933

Subject	West Seattle light rail EIS
From	michael.tanner22@gmail.com
To	Meeting Comments
Sent	Thursday, September 19, 2024 12:32 PM

[You don't often get email from michael.tanner22@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Question for meeting:

When will information on properties affected by access easements which weren't reported in the final EIS be available?

Subject	West Seattle Link Extension
From	Adam St. Denis
To	Email The Board
Sent	Monday, September 30, 2024 11:36 PM

You don't often get email from saint2558@gmail.com. [Learn why this is important](#)

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Despite the cost increases, I believe there should be no delay in adopting this extension as it is needed for West Seattle, the region, and to support the growth of West Seattle over the coming years.

I also believe despite the cost increases, the current preferred alternative should be adopted as is since it will give West Seattle the best possible system which would also allow for future expansions south. I would rather see a reforming or delay of 4 Line than see a delay here or with the Tacoma Dome Link Extension (as a South King resident).

I will use this system and it cannot be built soon enough.

Thank you.

Subject	10/10 System Expansion Committee Meeting Public Comment: In Support of the WSLE Preferred Alternative
From	Gavin Yehle
To	Meeting Comments
Sent	Thursday, October 10, 2024 9:14 AM

Dear Members of the System Expansion Committee,

In light of the recent publication of the FEIS and the release of the cost estimate for the WSLE project, we are all surprised by the increase in costs, but I think it is still of the upmost importance to continue ahead with the FULL project to protect and ensure the future of our city.

Seattle has a history of delaying or denying transit projects in the past with the voting down of federal funding in 1970, and then again with the monorail project in 2005. Now, we are left to spend more and take more time with rising property costs and inflation. These costs will only get higher if we delay or reduce projects, repeating the mistakes of the past.

Build the FULL line all the way to the Junction without delay.

All the best,
Gavin Yehle
West Seattle Resident

Subject	System Expansion Committee Meeting 10/10/24
From	Scott Smith
To	Meeting Comments
Sent	Thursday, October 10, 2024 11:53 AM

Hello,

I am writing to express my support for the staff recommendation for the West Seattle light rail link extension. There has been a great deal of misinformation about this project – particularly regarding the West Seattle portion. I have had the privilege of living in several cities with excellent public transportation systems, including a mix of buses, light rail, and trolleys. I have witnessed first hand the positive impact that such a system can have on a city and its community — allowing us to enjoy the Seattle area to the fullest. I strongly support the plan and believe it is crucial for the West Seattle community to have all three of the proposed stations. I look forward to the day when these new transportation options are available, making it easier for everyone to get where they need to go. It's never going to be cheaper and easier to implement than it is right now, any delay just adds needless cost and uncertainty.

Thank you for your consideration.

Sincerely,

Scott Smith

4032 37th Ave SW

206-707-3527

Subject	West Seattle Link Extension
From	Blair Johnson
To	Email The Board
Sent	Monday, October 7, 2024 4:51 PM

You don't often get email from blair_johnson@yahoo.com. [Learn why this is important](#)

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Sound Transit Board of Directors:

I support the West Seattle Link Extension. We need this. Please move forward with no delay!

Regards,

Blair Johnson

West Seattle

Subject	Please Deliver the WSLE to the Voters
From	Dylan Hanson
To	Email The Board
Sent	Wednesday, October 9, 2024 11:55 AM

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Dear Chair Constantine, Vice-Chair Roscoe, and Members of the Board,
Thank you for your work on delivering the most ambitious transit expansion nationwide.
I am writing to ask you to support Motion M2024-62, authorizing a Section 106 Programmatic Agreement for the West Seattle Link Extension.
Over 60% of West Seattle voters voted in favor of ST3. We ask the board to deliver on its promises without further delay.
It's no secret that costs have increased. Across the country, transportation project costs have grown. However, highway project costs have increased more dramatically and are still funded. It's time we delivered the projects that matter most to communities that need them. The West Seattle Link Extension cost increase is far below the 70% cost increase on the 520 bridge project and will deliver safe and reliable transit connections to the region.
A recent index poll conducted by the Seattle Metro Chamber of Commerce found that 66% of Seattle registered voters support keeping construction for light rail to West Seattle and Ballard on track to open in 2032, even if it costs more.
In the face of rising costs, the answer is not to delay; delay only adds more expense. By selecting a project to build and moving into the design phase, Sound Transit can get a clearer estimate of the actual costs, explore ways to reduce costs, and get the project ready to build.
Please put Sound Transit staff to work and direct them to reduce costs through the design process. Next, task our federal delegation with identifying federal grants to fund this work.
With light rail on the horizon, West Seattle can plan for and build vibrant, walkable, transit-connected communities. When light rail opens, it will connect more people to West Seattle to work, shop, and play, and make it possible to connect to even more communities in the future.
We look forward to working together to deliver on these projects. Please vote in favor of Motion M2024-62.
Thank you.
Dylan Hanson
hanson.dylan.c@gmail.com
504 7th St S
Kirkland, Washington 98033

Subject	In support of the light rail to West Seattle
From	Vinnu Komanapalli
To	Email The Board
Sent	Thursday, October 10, 2024 8:44 AM

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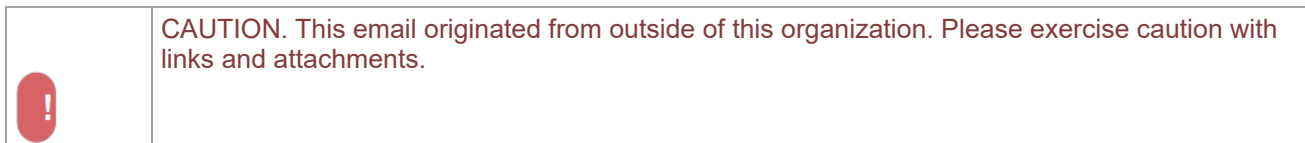
Hello,

I was exclusively using public transport until this past year, and even now that I have a car, I am very much in support of the light rail extension to West Seattle, specifically for it to be done in the original plan without cutting out parts of the route, and also for making the existing bus and link systems more efficient for riders. Seattle's public transport needs better cohesion, extension and safety so that people don't feel like it is a waste of time or a safety-risk for themselves or their kiddos to take public transport. If taking the new link still involves multiple transfers between multiple modes of transport, with half-an-hour-plus transfer times at unsafe-seeming bus stops, I imagine it will still not be used as much. Right now I would love to use public transport to go from West Seattle to UW or First Hill with my kiddo in a stroller. I made the trip to First Hill for my daughter's medical appointments when I still didn't have a car, but with the wait times involved between route 21 and any other route to get to the hospitals, it took a really long time and I just wouldn't want to do it again despite not wanting to drive in downtown. I think building out the light rail is really important, AND so is making the current system effective and dependable so that it can be a viable alternative to sitting in Seattle traffic. PS: I think adding a gondola would just add another inefficient mode of transport to an already disparate system.

--

Sincerely
Vinnu

From: Thomas Boyle <noreply@adv.actionnetwork.org>
Sent: Thursday, October 10, 2024 9:22 AM
To: Somers, Dave J <Dave.Somers@co.snohomish.wa.us>
Subject: Please Deliver the WSLE to the Voters



Executive Dave Somers,

Thank you for your work on delivering the most ambitious transit expansion nationwide.

I am writing to ask you to support Motion M2024-62, authorizing a Section 106 Programmatic Agreement for the West Seattle Link Extension.

Over 60% of West Seattle voters voted in favor of ST3. We ask the board to deliver on its promises without further delay.

It's no secret that costs have increased. Across the country, transportation project costs have grown. However, highway project costs have increased more dramatically and are still funded. It's time we delivered the projects that matter most to communities that need them. The West Seattle Link Extension cost increase is far below the increases on the 520 bridge project and will deliver safe and reliable transit connections to the region.

A recent index poll conducted by the Seattle Metro Chamber of Commerce found that 66% of Seattle registered voters support keeping construction for light rail to West Seattle on track to open in 2032, even if it costs more.

In the face of rising costs, the answer is not to delay; delay only adds more expense. By selecting a project to build and moving into the design phase, Sound Transit can get a clearer estimate of the actual costs, explore ways to reduce costs, and get the project ready to build.

Please put Sound Transit staff to work and direct them to reduce costs through the design process. Next, task our federal delegation with identifying federal grants to fund this work.

With light rail on the horizon, West Seattle can plan for and build vibrant, walkable, transit-connected communities. When light rail opens, it will connect more people to West Seattle to work, shop, and play, and make it possible to connect to even more communities in the future.

We look forward to working together to deliver on these projects. Please vote in favor of Motion M2024-62.

Thank you.

Thomas Boyle

thomasboyle777@gmail.com

3220 California Ave SW, Apt 410

Seattle, Washington 98116

Paul R. Sweum

217 185th Ave SE #111-206
Covington, WA 98042
AZWAglassworks@gmail.com

October 10, 2024

Board Administrator & Sound Transit Board of Directors

Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Re: Support for WSLE “preferred alignment” with 3 stations & cable-stayed bridge design over Duwamish

Sound Transit Board members:

I write my comments today as an urban planner, a resident who’s lived in King County for the majority of my adult life, as well as someone who frequents West Seattle and knows lifelong residents who live there.

I have looked at the various layouts for the WSLE and support the preferred option in consideration. West Seattle is in dire need of additional, reliable connectivity to the rest of Seattle and the Puget Sound region. I can’t think of another part of town that is in more urgent need of a reliable rapid transit option, especially in light of the recent issues and structural concerns with the West Seattle Bridge.

I am aware of the increasing costs to build this corridor and related budget concerns. I am also confident in Sound Transit staff’s ability to sleuth through project management and funding solutions to streamline this project and make it work.

That said, I implore you to move ahead with your preferred alternative per your recent layouts and designs – and to keep the three stations of Delridge, Avalon and Alaska Junction – with the latter ending in a tunnel in its current proposed alignment, setting up your agency to opt for further expansion southward if and when that day arrives. Maintaining these three stations in the designs will maximize community accessibility for West Seattle residents to this 3 Line for our regional light rail system.

I also support the preferred design for the cable-stayed bridge to safely transport light rail trains over the Duwamish River and port industrial areas. The design has a wonderful look that not only beautifies the southern end of town with an eye-catching structure, but will also qualify as the architectural crown jewel of the entire link light rail system. The structure also ties Seattle into similar transit-specific cable-stayed bridges with its Cascadia sister cities of Portland and Vancouver BC.

Keep up the great work, and please get it done. Full steam ahead.

Respectfully and with gratitude,

Paul R. Sweum



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Executive Dave Somers,

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Please put Sound Transit staff to work and direct them to reduce costs through the design process. Next, task our federal delegation with identifying federal grants to fund this work.

With light rail on the horizon, West Seattle can plan for and build vibrant, walkable, transit-connected communities. When light rail opens, it will connect more people to West Seattle to work, shop, and play, and make it possible to connect to even more communities in the future.

We look forward to working together to deliver on these projects. Please vote in favor of Motion M2024-62.

Thank you.

L Dong

ledong91@gmail.com

15128 NE Woodland Pl

Woodinville, Washington 98072

Subject	FW: Please Deliver the WSLE to the Voters
From	Geraghty, Melissa
To	Email The Board
Cc	Dugan, Joshua
Sent	Thursday, October 10, 2024 10:57 AM

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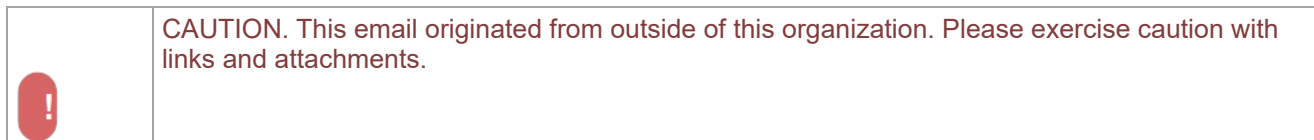
Please see email below sent to Exec Somers.

Thank you,

Melissa Geraghty
Snohomish County Executive Office
425-388-3050
Melissa.Geraghty@snoco.org

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From: Thomas Boyle <noreply@adv.actionnetwork.org>
Sent: Thursday, October 10, 2024 9:22 AM
To: Somers, Dave J <Dave.Somers@co.snohomish.wa.us>
Subject: Please Deliver the WSLE to the Voters



Executive Dave Somers,
Thank you for your work on delivering the most ambitious transit expansion nationwide. I am writing to ask you to support Motion M2024-62, authorizing a Section 106 Programmatic Agreement for the West Seattle Link Extension. Over 60% of West Seattle voters voted in favor of ST3. We ask the board to deliver on its promises without further delay. It's no secret that costs have increased. Across the country, transportation project costs have grown. However, highway project costs have increased more dramatically and are still funded. It's time we delivered the projects that matter most to communities that need them. The West Seattle Link Extension cost increase is far below the increases on the 520 bridge project and will deliver safe and reliable transit connections to the region. A recent index poll conducted by the Seattle Metro Chamber of Commerce found that 66% of Seattle registered voters support keeping construction for light rail to West Seattle on track to open in 2032, even if it costs more. In the face of rising costs, the answer is not to delay; delay only adds more expense. By selecting a project to build and moving into the design phase, Sound Transit can get a clearer estimate of the actual costs, explore ways to reduce costs, and get the project ready to build.

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Thank you.

Thomas Boyle

thomasboyle777@gmail.com

3220 California Ave SW, Apt 410

Seattle, Washington 98116

From: [Gamboa, Josephine](#)
To: [West Seattle Link Extension](#); [Wu, Phoebe](#)
Subject: FW: Sound Transit West Seattle Link Extension Final Environmental Impact Statement
Date: Friday, January 31, 2025 4:36:42 PM
Attachments: [image001.png](#)

FYI

Josephine Gamboa

Program Manager-Board Administration
Executive Department, Sound Transit
Pronouns: she/her
C 206-673-1126



From: Blair Johnson <blair_johnson@yahoo.com>
Sent: Friday, January 31, 2025 3:41 PM
To: Gamboa, Josephine <josephine.gamboa@soundtransit.org>
Subject: Sound Transit West Seattle Link Extension Final Environmental Impact Statement

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Administrator Gamboa:

Here are my comments I am sending to the US DOT and the FTA regarding the West Seattle Link Extension:

I am writing in support of Sound Transit's West Seattle Link Extension Final Environmental Impact Statement. The Seattle area has needed grade separated transit for a long time due to its unique geography, and even more so now due to the increasing population density. This project will provide people with a more practical way to get past surface street congestion than surface transit alone. The greenbelt area to be affected by the bridge placement is mainly large leaf maples that took over after these hillsides were logged of the original conifer forests over a hundred years ago. Replacing the removed trees with more appropriate local conifers will be an improvement to the ecosystem in the long run. Sound Transit has a very good record of mitigation of environmental impacts in its light rail projects in the Seattle area so far, and I expect them to do so with the West Seattle Link Extension also.

Please complete the Record of Decision to approve the West Seattle Link Extension.

Regards,
Blair Johnson
9002 13th Avenue SW
Seattle, WA 98106

From: Conrad Cipoletti <conrad.cipoletti@gmail.com>

Sent: Thursday, March 13, 2025 7:11 PM

To: FTADashboardinquiry <FTADashboardinquiry@dot.gov>

Subject: Correction Request - West Seattle Link Extension Project

Hello Todd and Team,

Can you please update the link below to reflect that the West Seattle Link Extension is not a project which "would expand Link light rail from downtown Seattle to West Seattle's Alaska Junction," as the website currently states inaccurately?

<https://www.permits.performance.gov/proj/west-seattle-and-ballard-link-extensions-projecteis/environmental-impact-statement-eis>

Sound Transit's own page for the site does not mention downtown and simply states the project "adds 4.1 miles of light rail service from SODO to West Seattle's Alaska Junction neighborhood."

West Seattle Link Extension | Project map and summary | Sound Transit

Please make this update so the public is not misled about the scope of the project. Thank you!

Conrad

From: AJ Johns <johns_aj@hotmail.com>

Sent: Wednesday, February 26, 2025 9:13 PM

To: FTADashboardinquiry <FTADashboardinquiry@dot.gov>

Subject: West Seattle Link - Sound Transit

To whom it may concern,

Please re-direct the federal dollars that were initially going to fund the Sound Transit West Seattle Link project. Use these funds to further reduce our national debt rather than 4.1 miles of unnecessary light rail. These are easy dollars for the Department of Government Efficiency to further succeed in their efforts.

Sincerely,

Joe Johns

425-404-1275

From: [John Niles](#)

To: [Tillinger, Todd \(FTA\)](#)

Subject: Re: question about process reporting on the U.S. Federal Infrastructure Permitting Dashboard

Date: Wednesday, February 19, 2025 11:05:59 AM

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Thank you sir for your note. My interest is the "no build" option for a light rail project. You can look up my name and find out which one I'm talking about but actually the specifics don't matter.

My question is, What is the procedural way for the "no build" to be selected. Is that actually a decision that would be made or is it more specifically that the project would have to be withdrawn or suspended or even canceled? If it is one of the latter, who in the federal government has the authority to order that cancellation or suspension? Can that order be given even if the local project sponsors wish to proceed to continue toward building the locally preferred option?

Sir, I am trying to tap into what I'm sure is your deep knowledge of the book of rules. I am not trying to get legal advice on obscurities from you. I just read that Secretary Duffy has issued a letter about stopping the New York City congestion tolling program. For reasons he and the administration consider sound, could he under the NEPA rules as you understand them, issue a similar letter for a Seattle light rail project that was in the final stages of NEPA process, with the record of decision scheduled in the permitting dashboard for February 28th?

Please call or write me back on this. Thank you very much.

V/r

John Niles

Sent from my T-Mobile 5G Device

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From: John Niles
To: Lindblom, Mike
Subject: NEWS TIP: West Seattle Link Extension Project | Permitting Dashboard
Date: Sunday, March 9, 2025 7:42:18 PM
Attachments: mXDDxz5Mt0qAh6dm.png
toLA0E34vzEzDud0.png

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<https://www.permits.performance.gov/permitting-project/dot-projects/west-seattle-link-extension-project>

Mike, I just saw a new permitting requirement and date show up on the U.S Govt permitting dashboard for West Seattle Link Extension I hadn't seen before:


West Seattle Link Extension Project

PROJECT WEBSITE: [West Seattle Link Extension Project](#)


All dates below are specific to the schedule of the Environmental Review and Permitting processes for this project.




ENVIRONMENTAL REVIEW AND PERMITTING STATUS
IN PROGRESS




ESTIMATED COMPLETION DATE OF ENVIRONMENTAL
REVIEW AND PERMITTING
08/02/2026




Project Primary Address
Primary Location
Project Address
Seattle, WA
United States




ENVIRONMENTAL REVIEW
AND PERMITTING
PROCESSES
COMPLETED



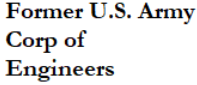
SECTOR
Surface Transportation



CATEGORY
Project Category DOT
Projects



LEAD AGENCY
Department of
Transportation, Federal
Transit Administration



**Former U.S. Army
Corp of
Engineers**

Lead Agency Information:

POC Name: **Todd Tillinger**
POC Title: Environmental Protection Specialist
POC Email: ftadashboardinquiry@dot.gov
Agency/Department: Federal Transit Administration

Sponsor Contact Information:

Other Agencies with Actions or Authorizations:

--

New page:

<https://www.permits.performance.gov/proj/west-seattle-and-ballard-link-extensions-project-eis/section-404-clean-water-act-section-10-0>

Section 404 Clean Water Act, Section 10 Rivers and Harbors Act of 1899, and Section 103 Marine Protection, Research, and Sanctuaries Act

Project Name: West Seattle Link Extension Project	Status: Planned
Responsible Agency: US Army Corps of Engineers - Regulatory	
Milestones:	
Pre-construction Notification (PCN)/Form ENG 4345/Joint Application Form Received (Applicant Action)	Current Target Date: 02/28/2025
Complete Pre-Construction Notification (PCN)/Application Received (Applicant Action)	Current Target Date: 08/02/2025
Publication of Public Notice (Agency Action)	Current Target Date: 08/03/2025
Final Verification/Permit Decision Rendered (Agency Action)	Current Target Date: 08/02/2026

John S. Niles
President, Global Telematics | globaltelematics.com | [linkedin.com/in/globaltelematics/](https://www.linkedin.com/in/globaltelematics/)
Executive Research Director, CATES -- Center for Advanced Transportation and Energy Solutions
Research Associate, Mineta Transportation Institute, San José State University
Board Member, Ridesharing Institute
Regional Associate, Urban Robotics Foundation
Seattle, WA USA | +1-206-781-4475 | jniles@alum.mit.edu & all previous addresses still valid | Twitter: @EndOfDriving and @JN_Seattle
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Preview of book at <http://endofdriving.org>

From: [John Niles](#)

To: [Tillinger, Todd \(FTA\)](#)

Cc: [Swift, Lauren](#); [Email The Board](#)

Subject: Re: question about process status reporting for West Seattle light rail on the U.S. Federal Infrastructure Permitting Dashboard

Date: Monday, March 17, 2025 5:54:55 PM

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Question for the public record. Answer sought for the public record.

Mr. Tillinger:

Thanks to the U.S. Government and FTA for transparency on its processes that have public impact.

Google searching tell me that Sound Transit projects involving work in or near navigable waters, including wetlands, require permits under Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act, as well as Section 103 of the Marine Protection, Research, and Sanctuaries Act for ocean disposal of dredged material.

The applicability of this requirement seems to be confirmed by new information on the West Seattle Link light rail Extension Permitting Dashboard at <https://www.permits.performance.gov/permitting-project/dot-projects/west-seattle-link-extension-project> that the ESTIMATED COMPLETION DATE OF ENVIRONMENTAL REVIEW AND PERMITTING referencing the permits named by Google is now listed as 08/02/2026, while the NEPA Record of Decision issuance is still scheduled for 4/29/2025.

My question seeking a yes or no response, is the overall NEPA Record of Decision for WSLE authorized under current practice to be issued *Before* the completion of "Final Verification/Permit Decision Rendered (Agency Action)" of permitting under Section 404 Clean Water Act, Section 10 Rivers and Harbors Act of 1899, and Section 103 Marine Protection, Research, and Sanctuaries Act; which has a listed planned completion date of 08/02/2026?

The answer per the Dashboard would seem to be Yes. This requirement covered by action of the U.S. Army Corps of Engineers appears to be independent of the ROD, and can come late. But I'm seeking confirmation of

my understanding.

Respectfully,

John S. Niles

President, Global Telematics | globaltelematics.com | [linkedin.com/in/globaltelematics/](https://www.linkedin.com/in/globaltelematics/)

Executive Research Director, CATES -- Center for Advanced Transportation and Energy Solutions

Research Associate, Mineta Transportation Institute, San José State University Board Member,
Ridesharing Institute

Regional Associate, Urban Robotics Foundation

Seattle, WA USA | +1-206-781-4475 | jniles@alum.mit.edu & all previous addresses still valid |

Twitter: @EndOfDriving and @JN_Seattle

Order *The End of Driving: Transportation Systems and Public Policy Planning for Autonomous Vehicles* textbook (Elsevier 2018) by Bern Grush and me

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[Transportation-Planning-Automated/dp/0443223920](https://www.amazon.com/End-Driving-Transportation-Planning-Automated/dp/0443223920)

From: [Gamboa, Josephine](#)
To: [West Seattle Link Extension](#); [Wu, Phoebe](#)
Subject: FW: Sound Transit West Seattle Link Extension Final Environmental Impact Statement
Date: Monday, February 3, 2025 7:07:26 AM
Attachments: [image001.png](#)

FYI

Josephine Gamboa

Program Manager-Board Administration
Executive Department, Sound Transit
Pronouns: she/her
C 206-673-1126



From: Keegan Walden <keegan9223@gmail.com>
Sent: Sunday, February 2, 2025 2:14 PM
To: DOTExecSec@dot.gov; Fletcher, Susan (FTA) <susan.fletcher@dot.gov>; Assam, Mark (FTA) <mark.assam@dot.gov>; Gamboa, Josephine <josephine.gamboa@soundtransit.org>
Subject: Sound Transit West Seattle Link Extension Final Environmental Impact Statement

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Hello,

I'm writing to you all simply to say I am in support of this project. I'm satisfied with the proposed environmental impact mitigation plan, and I look forward to future-oriented transit in the city that will come from this project.

Thank you,
Keegan Walden

From: MartinWesterman <artartart@seanet.com>

Sent: Sunday, March 16, 2025 6:09 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Re: Do NOT move WSLE to “design” phase: Comment to ST board 10/24/2024

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the content is safe. Report any suspicious email by clicking the “fish” button in Outlook. Thank you! ST Information Security

Good morning,

Please also enter all of my commenst in the record of decision on WSLE.

Thank you,
Martin Westerman

On Oct 28, 2024, at 11:28 AM, Email The Board
<EmailTheBoard@soundtransit.org> wrote:

Good morning,

On behalf of the Sound Transit Board of Directors, thank you for your message concerning the West Seattle light rail project. Your comment was provided to the Board following the meeting and forwarded to our West Seattle project team for consideration.

Josephine Gamboa
Program Manager-Board Administration
Executive Department, Sound Transit
Pronouns: she/her

From: MartinWesterman <artartart@seanet.com>

Sent: Thursday, October 24, 2024 1:31 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Cc: Zahilay, Girmay <girmay.zahilay@kingcounty.gov>; Teresa Mosqueda <teresa.mosqueda@kingcounty.gov>; Rob Saka <rob.saka@seattle.gov>; Strauss, Dan <Dan.Strauss@seattle.gov>; Harrell, Bruce <Bruce.Harrell@Seattle.gov>; Rudolph, Catherine <catherine.rudolph@piercecountywa.gov>; Dave.Somers@co.snohomish.wa.us; Franklin, Cassie <cfranklin@everettwa.gov>

Subject: Do NOT move WSLE to “design” phase: Comment to ST board 10/24/2024

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Greetings esteemed leaders,

We ask the board to vote NO on moving WSLE to “design phase.”

Every time you use “the voters have spoken” as your rationale for proceeding with WSLE, you know that your voters did NOT approve this in the 2016 ST3 package. They approved a WSBLE package that would improve transit, and study light rail. Sound Transit has not used ST3 money yet to improve transit in the three-county region.

Sound Transit HAS generated a light rail study, that found WSLE will not improve transit ridership, reduce congestion, or contribute to social justice and economic development. It will irreparably damage the environment, exacerbate heat islands, create food deserts and not improve transit deserts between SODO and the West Seattle Junction.

The board has been acting as if costs are irrelevant to this project. In fact, Motion 2024-59 directs ST’s CEO to shift WSLE baseline costs to make the project, which is \$5 billion over what voters approved in 2016, appear more affordable over a longer term than voters approved. We urge you to vote NO on this motion.

You have all received our FEIS document, assembled by regional transit experts, and attached again here. Appendix 8 is a consulting document that found three factors driving excessive U.S. transit project costs. It provides warnings for ST, and guidance on how to avoid pitfalls that add approximately 85% to transportation costs:

Lack of design standardization — leading to fewer economies of scale, inability to replicate station designs quickly without incurring more design costs, and difficulty in applying lessons learned from one station to another during the construction process.

Labor costs: about 40-60% of US projects' hard costs, vs. labor costs in other countries studied (Turkey, Italy, and Sweden), that ranged from 19%-30% with Sweden as highest-wage case at 23%.

U.S. procurement norms: pervasive culture of secrecy and adversarialism between agencies and contractors; lack of agency internal capacity to manage contractors; insufficient competition; a desire to privatize risk that leads private contractors to bid higher; and extra money for red tape, wasted contingencies, paying workers during delays, defensive design, and profit.

Are WSLE economics irrelevant to this board? Are you believing what Transportation Choices Coalition has told you — that money grows on trees? The term “affordable

schedule” should be meaningful in the WSLE EIS process: you should be understanding that taxpayer funds and patience are limited, especially as WSLE is now 3 times more expensive than voters approved in 2016, and per costs have climbed to \$1.3 million /rider.

I urge you to stop using my 2016 approval vote on ST3, for \$1.75 billion, as your excuse for proceeding with WSLE alone for \$7 billion. For that cost, you could electrify the entire Metro Transit fleet in King County, and improve transit across three counties. You remind me of an old joke about two women eating in a restaurant. One says, “This food is terrible,” and the other says, “And such tiny portions!” For a terrible WSLE proposal, we get so little public transit.

All the best on your reaching better transit decisions than you have been making so far,
Martin Westerman, West Seattle / 206-427-9039
Regional Transit Partners
Attachment: FEIS-C

From: Mike Lindblom <mlindblom@seattletimes.com>

Sent: Wednesday, March 12, 2025 8:31 PM

To: FTADashboardinquiry <FTADashboardinquiry@dot.gov> **Cc:** Mike Lindblom <mlindblom@seattletimes.com> **Subject:** West Seattle Link - question about dashboard info:

Hello Todd and team -

I noticed on the dashboard that FTA's Record of Decision for Sound Transit's West Seattle Link, at one time expected in November 2024, has been pushed out to an estimated completion of August 2026, the third postponement.

Can you tell me why the ROD completion is taking that much longer?

Is Sound Transit required to fulfill other steps before the ROD, such as a Clean Water Act?

Mike Lindblom Transportation reporter The Seattle Times

206-515-5631

From: Patrick Robinson <pr@robinsonnews.com>

Sent: Saturday, November 30, 2024 6:54 PM

To: FTADashboardinquiry <FTADashboardinquiry@dot.gov>

Subject: Can you tell us why the date has changed?

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I'm writing about the West Seattle Link Extension light rail project whose Record of Decision WAS Nov.29 2024 and has now been delayed to February 2025. Why?

Patrick Robinson

WestsideSeattle.com

From: Patrick Robinson <pr@robinsonnews.com>

Sent: Tuesday, February 25, 2025 2:43 PM

To: FTADashboardinquiry <FTADashboardinquiry@dot.gov>

Subject: Can you offer a reason why the Record of Decision date has changed?

You don't often get email from pr@robinsonnews.com. [Learn why this is important](#)

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

It was supposed to be Feb. 28 but is now April 29

Patrick Robinson

WestsideSeattle.com

Appendix C - Comments Received After April 15, 2025

Swift, Lauren

From: Assam, Mark (FTA) <Mark.Assam@dot.gov>
Sent: Wednesday, April 23, 2025 8:24 AM
To: Tillinger, Todd (FTA); Heather Jones; Montgomery, Mark (FTA); Ann Costanza; Swift, Lauren
Subject: FW: Light rail

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FYI...

Mark A. Assam, AICP
Environmental Protection Specialist
U.S. Department of Transportation
Federal Transit Administration | Office Environmental Policy and Programs
915 2nd Avenue, Suite 3192 | Seattle, WA 98174-1002
(206) 220-4465 | mark.assam@dot.gov | www.transit.dot.gov

-----Original Message-----

From: Mallory Lavin <447@comcast.net>
Sent: Tuesday, April 22, 2025 9:28 PM
To: Assam, Mark (FTA) <Mark.Assam@dot.gov>
Subject: Light rail

[You don't often get email from 447@comcast.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please do not expand light rail to West Seattle. Our Metro bus system is working just fine.

Negative Impact on Transit Times and Ridership:

WSLE will degrade transit service, increasing travel times and requiring multiple transfers, which will negatively impact rider experience and reduce ridership efficiency.

* High Carbon Emissions from Construction:

The construction of WSLE will generate significant carbon emissions (140,952 metric tons), which will take decades to mitigate, making it environmentally unsustainable.

* Destruction of Forest and Habitat:

WSLE will eliminate acres of forest and habitat, causing irreparable environmental damage and exacerbating urban heat islands, particularly affecting low-income and minority communities.

* Economic and Social Setbacks:

The project will set back economic development, equity, and community-building efforts in West Seattle and the Chinatown-International District for at least a decade.

* High Costs and Financial Burden:

The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects, with questionable financial sustainability.

* Displacement of Businesses and Residents:

WSLE will displace over 100 houses and apartments and at least 70 businesses, leading to job losses and further economic disruption in affected communities.

Sent from my iPhone

Swift, Lauren

From: Assam, Mark (FTA) <Mark.Assam@dot.gov>
Sent: Friday, April 25, 2025 10:35 AM
To: Tillinger, Todd (FTA); Heather Jones; Montgomery, Mark (FTA); Ann Costanza; Swift, Lauren
Subject: FW: Action Needed

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FYI...

Mark Assam
(206) 220-4465

-----Original Message-----

From: Mallory Lavin <447@comcast.net>
Sent: Thursday, April 24, 2025 10:22 PM
To: Assam, Mark (FTA) <Mark.Assam@dot.gov>
Subject: Action Needed

[You don't often get email from 447@comcast.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Seattle has a metro system that is a fully functional transportation system and it's great! There is no reason to bring a train to West Seattle. There is no need to go forward with the West Seattle extension and spend billions to do so. Also it brings so much damage our neighborhood community and vital environmental systems like salmon in Longfellow creek.

* Negative Impact on Transit

Times and Ridership:

WSLE will degrade transit service, increasing travel times and requiring multiple transfers, which will negatively impact rider experience and reduce ridership efficiency.

* High Carbon Emissions from Construction:

The construction of WSLE will generate significant carbon emissions (140,952 metric tons), which will take decades to mitigate, making it environmentally unsustainable.

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The project will set back economic development, equity, and community-building efforts in West Seattle and the Chinatown-International District for at least a decade.

* High Costs and Financial Burden:

The estimated cost of \$7+ billion for WSLE is exorbitant, making it one of the world's most expensive urban rail projects, with questionable financial sustainability.

* Displacement of Businesses and Residents:

WSLE will displace over 100 houses and apartments and at least 70 businesses, leading to job losses and further economic disruption in affected communities.

* Lack of Voter Awareness and Misinformation:

Many voters were unaware of the significant negative impacts of WSLE when they approved ST3 in 2016, including environmental damage and increased costs.

* Inefficiency Compared to Current Transit Modes:

Current bus and rapid transit services are more efficient, carrying more passengers with lower carbon footprints and fewer environmental impacts than the proposed light rail.

* Legal and Responsible No Build Option:

The Sound Transit Board has the authority to choose the No Build option, which is a legitimate and responsible choice under federal and state law and would avoid the negative impacts of WSLE.

* Better Alternatives Available:

Lower carbon, less expensive, and less destructive public transit options, such as bus lane expansions and electrification of the bus fleet, are available and could serve West Seattle riders more effectively than WSLE. Sent from my iPhone

Appendix D

Section 106 Programmatic Agreement

February 25, 2025

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1 **PROGRAMMATIC AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION,**
2 **THE WASHINGTON STATE DEPARTMENT OF ARCHAEOLOGY AND HISTORIC**
3 **PRESERVATION, AND THE CENTRAL PUGET SOUND REGIONAL TRANSIT AUTHORITY**
4 **IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR**
5 **THE WEST SEATTLE LINK EXTENSION PROJECT**
6 **SEATTLE, KING COUNTY, WASHINGTON**

7 **WHEREAS**, the Central Puget Sound Regional Transit Authority (Sound Transit) proposes to
8 construct approximately 4.1 miles of light rail between the neighborhoods commonly known as
9 SODO and West Seattle, divided into four (4) segments: SODO, Duwamish, Delridge, and West
10 Seattle Junction, known as the West Seattle Link Extension (the Project), pursuant to the Sound
11 Transit 3 plan of regional transit system investments, funding for which was approved by voters
12 in the region in 2016;

13 **WHEREAS**, subject to the commitment of local funding, the Project will utilize funds
14 administered by the Federal Transit Administration (FTA) authorized by 49 U.S.C. Chapter 53;

15 **WHEREAS**, FTA has determined that the Project is an undertaking subject to the requirements
16 of 36 CFR Part 800, the regulations implementing Section 106 of the National Historic
17 Preservation Act (NHPA), 54 U.S.C. §306108, as amended (August 5, 2004);

18 **WHEREAS**, the United States Army Corps of Engineers (USACE) is a Cooperating Agency
19 pursuant to 40 CFR 1501.6 and 40 CFR 1508.5 and may issue permits authorizing the
20 discharge of dredged or fill material in conjunctions with the Project construction pursuant to 33
21 USC § 11 and Section 404 of the Clean Water Act (Section 404), 33 USC § 1251-1376, as
22 amended, as well as permits pursuant to 33 USC 408 and 33 USC § 403 of the Rivers and
23 Harbors Act (Section 10);

24 **WHEREAS**, FTA and the USACE have agreed that FTA will act as Lead Federal Agency for
25 Section 106 compliance and will act on behalf of the USACE;

26 **WHEREAS**, the United States Coast Guard (USCG), is a Cooperating Agency pursuant to 40
27 CFR 1501.6 and 40 CFR 1508.5 and may issue permits authorizing bridge construction over the
28 Duwamish waterway pursuant to 33 USC 401 of the Rivers and Harbors Act (Section 9) in
29 conjunction with Project construction;

30 **WHEREAS**, FTA and the USCG have agreed that FTA will act as Lead Federal Agency for
31 Section 106 compliance and will act on behalf of the USCG;

32 **WHEREAS**, the United States Postal Service (USPS) and the Port of Seattle are Cooperating
33 Agencies pursuant to 40 CFR 1501.6 and 40 CFR 1508.5, as property owners potentially
34 affected by Project construction;

35 **WHEREAS**, in accordance with 36 CFR § 800.14(b) and § 800.6, on June 28, 2024 FTA has
36 notified the Advisory Council on Historic Preservation (ACHP) of its intent to use a
37 Programmatic Agreement (Agreement) to partially fulfill its Section 106 obligations for the
38 Project and has invited ACHP to participate in the development of this Agreement, and on July
39 15, 2024 the ACHP has chosen not to participate in the consultation pursuant to 36 CFR §
40 800.6(a)(1)(iii);

41 **WHEREAS**, FTA has initiated consultation in accordance with 36 CFR § 800.3(c) with the
42 Washington State Historic Preservation Officer (SHPO), Department of Archaeology and
43 Historic Preservation (DAHP) in coordination with Sound Transit (under DAHP Project No. 2019-
44 02-01457), and is continuing the Section 106 process for the Project with an Agreement in

1 accordance with 36 CFR § 800.14(b) because the effects of the Project on historic properties
2 cannot be fully determined prior to approval of the Project, and the Project will have an Adverse
3 Effect on nine (9) known properties determined eligible for listing in the National Register of
4 Historic Places (NRHP), herein referred to as historic properties as defined in 36 CFR §
5 800.16(l)(1);

6 **WHEREAS**, under this Agreement, pursuant to 36 CFR § 800.2(a)(3), FTA designated Sound
7 Transit to work directly with DAHP on FTA's behalf, with FTA remaining responsible for
8 designating Consulting Parties and making all findings and determinations pursuant to 36 CFR
9 Part 800;

10 **WHEREAS**, FTA has invited Sound Transit to be an Invited Signatory to this agreement as they
11 are the project proponent and are required to carry out the commitments identified in this
12 agreement as a stipulation for funding of the project by FTA;

13 **WHEREAS**, pursuant to 36 CFR § 800.2(c)(2)(ii) and 36 CFR § 800.14(b) and (f), FTA has
14 initiated consultation with the following federally recognized Tribes and invited their participation
15 in the development of this Agreement: the Muckleshoot Indian Tribe, Snoqualmie Indian Tribe,
16 Suquamish Indian Tribe of the Port Madison Reservation, Tulalip Tribes of Washington, and
17 Confederated Tribes and Bands of the Yakama Nation. The named federally recognized Tribes
18 are collectively referred to here as "Consulting Tribes" and FTA invited all of the Consulting
19 Tribes to sign this Agreement as Concurring Parties;

20 **WHEREAS**, FTA acknowledges its continued responsibility to engage in meaningful
21 government-to-government consultation with the Consulting Tribes (pursuant to Executive Order
22 13175, 54 U.S.C. § 302706(b), the January 26, 2021 Presidential Memorandum on Tribal
23 Consultation and Strengthening Nation-to-Nation Relationships, and 36 C.F.R. § 800.2(c)(2)
24 throughout the process of carrying out the stipulations of this Agreement as applicable. This
25 Agreement does not alter the existing government-to-government relationship between FTA and
26 any Tribe. Additionally, nothing in this Agreement is intended to repeal, supersede, or modify
27 any right, privilege, or immunity granted, reserved, or established pursuant to treaty, statute, or
28 Executive Order pertaining to any Tribe, nor is it intended to confer any additional right,
29 privilege, or immunity not otherwise granted, reserved, or established pursuant to treaty, statute,
30 or Executive Order pertaining to any Tribe;

31 **WHEREAS**, FTA has prepared this Agreement in consultation with the Alliance for Pioneer
32 Square, City of Seattle, and the Washington Trust for Historic Preservation regarding the effects
33 of the Project on historic properties and the development of mitigation measures and
34 stipulations, and invited all of these entities to sign this Agreement as Concurring Parties;

35 **WHEREAS**, Sound Transit has coordinated with the non-federally recognized Duwamish Tribal
36 Organization, the Snohomish Tribe, and the public on the effects of the Project on historic
37 properties and the development of mitigation measures and stipulations;

38 **WHEREAS**, FTA, in coordination with Sound Transit, has defined the Area of Potential Effect
39 (APE) for the Project as depicted in Attachment A, and consulted on the APE with DAHP,
40 Consulting Tribes and other Consulting Parties;

41 **WHEREAS**, FTA, in coordination with Sound Transit, and in consultation with DAHP, Consulting
42 Tribes and other Consulting Parties have completed the inventory of the historic built
43 environment to identify historic properties as defined by 36 CFR § 800.16(1) that are listed in, or
44 eligible for listing in, the NRHP, the results of which are shown in Attachment B of this
45 Agreement, and DAHP has concurred with these determinations;

1 **WHEREAS**, as the design and construction advance, FTA, in coordination with Sound Transit,
2 may be required to conduct inventory of areas added to the APE to identify and evaluate historic
3 properties that could potentially be affected by the Project and, if needed, shall do so in
4 consultation per the terms of this Agreement;

5 **WHEREAS**, FTA in coordination with Sound Transit, has consulted with DAHP, Consulting
6 Tribes, and other Consulting Parties and has determined the Project will have an Adverse Effect
7 on Archaeological Site 45KI52;

8 **WHEREAS**, because of lack of access, FTA, in coordination with Sound Transit, has completed
9 limited survey to identify archaeological resources as defined by 36 CFR § 800.16(1) that are
10 listed in, or eligible for listing in the NRHP and have agreed to implement a process for further
11 identification and evaluation of archaeological sites pursuant to 36 CFR § 800.4(b)(2), and defer
12 until after the execution of this Agreement additional identification and evaluation of
13 archaeological sites, assessment of Adverse Effects, and resolution of Adverse Effects, if
14 needed, as provided for in this Agreement;

15 **WHEREAS**, FTA, in coordination with Sound Transit, have consulted with DAHP, Consulting
16 Tribes, other Consulting Parties, and the ACHP on Adverse Effect(s) to known historic
17 properties, including buildings, structures, sites, districts, and objects within the APE, that are
18 anticipated to arise as a result of the Project;

19 **WHEREAS**, FTA in coordination with Sound Transit, and in consultation with DAHP, Consulting
20 Tribes, and other Consulting Parties, has determined that the Project will have an Adverse
21 Effect on the following known historic properties, which are listed or eligible for listing in the
22 NRHP: all buildings within the Pacific Forge Company/Bethlehem Steel Nut and Bolt Factory
23 Historic District, 3800 West Marginal Way Southwest; the Alaskan Copper Company
24 Employment Office and Auto Repair Garage, 2958 6th Avenue South; the Spokane Street
25 Manufacturing Historic District (multiple addresses); Acme Tool Works, 3626 East Marginal Way
26 South; Graybar Electric Company Building, 1919 6th Avenue South A.M. Castle and Company
27 Steel 3640-60 East Marginal Way South, and the Cettolin House, 4022 32nd Avenue Southwest;

28 **WHEREAS**, FTA in coordination with Sound Transit, and in consultation with DAHP, Consulting
29 Tribes, and other Consulting Parties, has determined that historic properties included in
30 Attachment B but not listed above as adversely affected, will not be adversely affected by the
31 Project;

32 **WHEREAS**, measures are included in this Agreement to avoid and/or minimize effects to
33 historic properties through a design development and review process and the implementation of
34 protection measures for historic properties during Project construction;

35 **WHEREAS**, FTA, in coordination with Sound Transit, and in consultation with DAHP, Consulting
36 Tribes, and other Consulting Parties, has determined that ground-disturbing work for the Project
37 may adversely affect archaeological resources that may be eligible for listing in the NRHP but
38 are located in areas that are currently not accessible for testing and evaluation;

39 **WHEREAS**, the Project is defined here as the Preferred Alternative identified in the Final
40 Environmental Impact Statement (EIS) published on September 20, 2024 This Preferred
41 Alternative may include refinements made by Sound Transit's Board of Directors when selecting
42 the project to be built and is anticipated in this Agreement to be selected as the project to be
43 built. If portions or all of the project to be built as selected by the Sound Transit Board of
44 Directors includes different alternatives than those included as the Preferred Alternative in the
45 Final EIS then this Agreement will be amended to reflect such changes, per Stipulation XXXI;

1 **WHEREAS**, FTA shall consult with DAHP, Consulting Tribes, and other Consulting Parties on
2 revisions to the APE and on additional investigation within the revised APE that may be required
3 as a result of changes to the Project, following the execution of this Agreement. Such
4 consultation will follow the processes outlined in Stipulation V. FTA shall also consult with the
5 Signatories of this Agreement and other Consulting Tribes and other Consulting Parties on
6 effects to newly identified historic properties and shall resolve Adverse Effects to newly identified
7 historic properties pursuant to Stipulation IX;

8 **WHEREAS**, this Agreement was developed with appropriate public involvement pursuant to 36
9 CFR § 800.2(d) and § 800.6(a)(4); the public involvement was coordinated with the public
10 review conducted by FTA and Sound Transit to comply with National Environmental Policy Act
11 (NEPA), as amended, pursuant to 36 CFR § 800.8(a);

12 **WHEREAS**, public involvement in the Section 106 review process, including notification of the
13 Project's Adverse Effects to known historic properties pursuant to 36 CFR § 800.6(a)(3),
14 following the publication of the NEPA Environmental Impact Statement (EIS) and these
15 provisions shall be coordinated through public communication methods in a way that is
16 commensurate with the type and scale of public input being sought pursuant to Stipulations
17 VI(B) and VIII(B);

18 **WHEREAS**, FTA in coordination with Sound Transit shall continue to consult with DAHP,
19 Consulting Tribes, and other Consulting Parties under the terms of this Agreement until such
20 time as FTA determines that all the activities subject to this Agreement are completed or the
21 Agreement is terminated pursuant to Stipulation XXXII;

22 **NOW, THEREFORE**, FTA, Sound Transit, and DAHP agree that the Project shall be
23 implemented in accordance with the following stipulations in order to resolve the effects of the
24 Project on historic properties.

25 **STIPULATIONS**

26 FTA, in coordination with Sound Transit, shall ensure that the following measures are carried
27 out:

28 **I) Applicability**

- 29 A. If Sound Transit applies for additional federal funding or approvals for the Project
30 from a federal agency that is not party to this Agreement, the agency may choose to
31 remain individually responsible for their Project under 36 CFR Part 800. Alternatively,
32 if the Project as described herein remains unchanged, such funding or approving
33 agency may request in writing to FTA and DAHP of their desire to designate FTA as
34 lead federal agency for the Project pursuant to 36 CFR § 800.2(a)(2) and to become
35 a Consulting Party to this Agreement pursuant to Paragraph B of this stipulation.
- 36 B. If during the implementation of this Agreement, FTA identifies other agencies, tribes,
37 individuals, and organizations with a demonstrated interest in the Project due to the
38 nature of their legal or economic relation to the Project or affected properties, or due
39 to their concern with the Project's effects on historic properties, FTA may offer such
40 entities Consulting Party status pursuant to 36 CFR § 800.2(c) and/or invite them to
41 become party to this Agreement, with notification to DAHP, Consulting Tribes, and
42 other Consulting Parties.
- 43 1) If FTA invites an entity to become an Invited Signatory, the party may accept
44 this status by agreeing in writing to the terms of this Agreement and so
45 notifying FTA. If the entity agrees to become an Invited Signatory and DAHP,

USACE, the USCG, and Sound Transit, have no objections, FTA shall follow Stipulation XXXI, to amend this Agreement.

- 2) If FTA invites an entity to become a Concurring Party, the entity may accept this status by agreeing in writing to the terms of this Agreement and so notifying FTA. Because Concurring Parties have no responsibility for implementation of this Agreement, FTA may add such parties to the consultation process without formal amendment of this Agreement. FTA shall notify DAHP, Consulting Tribes, and other Consulting Parties of any entities who agree to become a Concurring Party.

C. The Project may have multiple construction contracts and design and construction of the Project may be divided up geographically and/or by discipline. For purposes of this Agreement these divisions may be considered independently for consultation pursuant to this Agreement. In these instances, the Project status (e.g., design milestone or construction phase) may be considered specific to the contract or element without applying to the entire Project. DAHP, Consulting Tribes, and other Consulting Parties will be notified regarding divisions of Project contracting and design and/or construction status as the Project advances.

D. For the purposes of this Agreement, the use of the term "construction" includes major Project construction, as well as any advanced construction which may include activities such as demolition activities, earthwork, staging, and construction of Project infrastructure and related improvements.

II) Roles and Responsibilities

A. FTA

As the federal lead agency, the FTA has primary responsibility pursuant to 36 CFR 800.2(a)(2) to ensure that the provisions of this Agreement are carried out. FTA shall coordinate with Sound Transit to carry out the terms of this Agreement. FTA will conduct formal consultation with DAHP, Consulting Tribes, and other Consulting Parties. FTA is responsible for all determinations of eligibility and findings of effect of the Project.

B. Sound Transit

As the Project proponent, and as a condition of award of any FTA funding, Sound Transit, in coordination with FTA, shall be primarily responsible for implementing this Agreement and support FTA in fulfilling its Section 106 consultation requirements. Sound Transit will ensure that all cultural resources related work described in this Agreement is performed by Secretary of the Interior (SOI) qualified individuals pursuant to Stipulation III(B) as appropriate.

C. DAHP

DAHP shall be responsible for participating in consultation as set forth in this Agreement and for reviewing Project documentation within the timeframes established in the Agreement. DAHP shall provide comments on APE amendments, and review and concur as appropriate on all FTA determinations and findings pursuant to processes outlined in 36 CFR Part 800 and below.

III) Standards and General Requirements

A. All work carried out pursuant to this Agreement shall meet SOI Standards for Archaeology and Historic Preservation (48 FR 44716) and/or the SOI's Standards for the Treatment of Historic Properties (36 CFR Part 68), as applicable (individually or collectively, SOI Standards). Documentation for determinations of eligibility and findings of effect shall meet 36 CFR § 800.11, the SOI Standards, the National Park

- 1 Service's Bulletins, and DAHP survey and reporting guidance, as appropriate.
2 Documentation of historic properties for the purposes of resolving Adverse Effects
3 under Stipulation IX, will follow DAHP published documentation standards or other
4 that is agreed upon in writing by both FTA and DAHP.
- 5 B. FTA shall ensure that all activities conducted pursuant to this Agreement shall be
6 carried out by, or under the direct supervision of, historic preservation professional(s)
7 who meet the SOI's Professional Qualification Standards (48 FR 44738-44739) in
8 the appropriate field(s) for the activity (SOI-Qualified Professionals). Sound Transit
9 shall ensure that consultants retained for services pursuant to implementation of this
10 Agreement are SOI-Qualified Professionals, or in the instance of other allied
11 professions not covered by the SOI's Professional Qualification Standards, they shall
12 meet other nationally recognized standards or licensure/certification requirements for
13 the profession, as applicable.
- 14 C. DAHP, Consulting Tribes, and other Consulting Parties shall keep sensitive cultural
15 resources information confidential to the extent allowed by state (Revised Code of
16 Washington (RCW) 42.56.300) and federal law (Section 304 of the National Historic
17 Preservation Act). Sensitive cultural resources information is defined as information
18 about the location, character, or ownership of a historic property. If it is determined
19 that disclosure may cause a significant invasion of privacy, risk harm to a historic
20 property, impede the use of a traditional religious site by practitioners, or contain
21 archaeological site description or location information, sensitive cultural resources
22 information shall be excluded from all public documents. Unredacted documents that
23 contain sensitive cultural resources information shall only be accessed by approved
24 personnel or SOI-Qualified Professional, as defined the Secretary of Interior's
25 Professional Qualifications Standards (36 CFR Part 61).
- 26 D. FTA acknowledges that Tribes possess special expertise in assessing the NRHP
27 eligibility of properties with religious and cultural significance to their Tribe(s). If a
28 Tribe requests, or if FTA otherwise offers and the Tribe accepts, Concurring Party
29 status under this Agreement, FTA shall seek input from the Tribe to determine
30 whether a SOI-Qualified Professional is qualified to assess the potential religious or
31 cultural significance to the Tribe under NRHP criteria.
- 32 E. FTA, in coordination with Sound Transit, shall ensure that all collections, consisting of
33 artifacts, samples, notes, maps, photographs, and other materials and documents
34 associated with archaeological investigations conducted pursuant to this Agreement,
35 will be curated pursuant to Stipulation XXVII, Collection and Curation, of this
36 Agreement and as detailed in Attachment C.
- 37 F. FTA and Sound Transit shall transmit all site forms, reports, and other documentation
38 associated with investigations and findings to DAHP through the Washington
39 Information System for Architectural and Archaeological Records Data (WISAARD),
40 unless otherwise noted at the request of the Consulting Tribes or other Consulting
41 Parties. Further, this Agreement stands in lieu of a Washington State Archaeological
42 Excavation Permit as per RCW 27.53.
- 43 G. FTA and Sound Transit shall transmit all site forms, reports, and other documentation
44 associated with investigations and findings resulting from implementation of this
45 Agreement to the City and/or input into the City's database identified in Stipulation
46 XXII, as appropriate.
- 47 H. FTA shall honor the request of any federally recognized and Consulting Tribe for
48 direct government-to-government consultation regarding the Project.
- 49 I. FTA, in coordination with Sound Transit, anticipates continued consultation at regular
50 intervals (e.g., monthly) with DAHP, Consulting Tribes, and other Consulting Parties

1 to implement and report on implementation of stipulations of this Agreement. Such
2 consultation meetings may be held, in-person, on-line or in a hybrid format. Such
3 meeting cadence may be adjusted throughout the life of this Agreement. FTA will
4 notify DAHP, Consulting Tribes, and other Consulting Parties of adjustments in
5 meeting cadence via email.

- 6 J. Definitions in 36 CFR § 800.16 will be used for the purposes of this Agreement.
7 Additional terminology is included below:

8 1) Signatory

9 In accordance with 36 CFR § 800.6(c)(1), a signatory has the sole authority
10 to execute, amend, or terminate the agreement. The federal agency and
11 the SHPO/THPO are signatories; the ACHP is a signatory as well when it
12 has participated in consultation for the agreement and in all program PAs.
13 Except as described below, their signature is almost always required for the
14 agreement to go into effect. Once all of the signatories have signed the
15 agreement, it is executed and goes into effect. Signatories to this
16 agreement are FTA and DAHP.

17
18 2) Invited Signatory

19 In accordance with 36 CFR § 800.6(c)(2), an invited signatory, upon
20 signing, has the authority to amend and terminate the agreement. The
21 agency official may invite additional parties to sign the agreement, such
22 as an Indian tribe or NHO who attaches religious and cultural
23 significance to historic properties affected by the undertaking (off tribal
24 lands), or any party that assumes a responsibility under the agreement.
25 The refusal of an invited signatory to sign the agreement does not
26 prevent the agreement from being executed; however, an agreement
27 cannot impose a duty or responsibility on a party that has not signed it.
28 When an Indian tribe or NHO is asked to be an invited signatory to an
29 agreement for which the undertaking will not occur on or affect historic
30 properties on tribal lands, the THPO or a representative designated by
31 the tribe or NHO, as the case may be, can sign the agreement on behalf
32 of the tribe or NHO. The ACHP notes and accepts that some tribes may
33 decline to sign agreement documents in principle but may participate in
34 development of the agreement. Such decisions are within the rights of
35 Indian tribes, and the ACHP recommends that agencies understand and
36 accept such decision. Invited Signatories to this agreement are, Sound
37 Transit, and USPS.

38
39 3) Concurring Party

40 In accordance with 36 CFR § 800.6(c)(3), a concurring party is a
41 consulting party invited to concur in the agreement document but who
42 does not have the authority to amend or terminate the agreement. Like
43 an invited signatory's signature, a concurring party signature is not
44 required to execute the agreement; a concurring signature is essentially
45 an endorsement of the agreement. Thus, the refusal to sign by any
46 party asked to concur in the agreement does not prevent the agreement
47 from being executed. Whether any or all other Consulting Parties are
48 invited to concur in an agreement is at the federal agency's sole
49 discretion. Extending the offer to sign an agreement as a concurring
50 party may be an effective way of recognizing the assistance and

support that a party has provided for the actions being evidenced in the agreement and encouraging their ongoing support.

The individual who signs the agreement on behalf of any invited signatory or concurring party should be one with approval authority for any responsibilities or duties assumed under the agreement, or authority to represent the broad interests of their organization, as the case may be. The signature page of the agreement document should identify and differentiate the signatories, invited signatories, and concurring parties. Concurring Parties to this agreement are anticipated to be the Muckleshoot Tribe of Indians, the Suquamish Tribe of Port Madison Reservation and the City of Seattle.

4) Consulting Tribes

Consulting Tribes refers to Tribes included in formal Section 106 consultation and included in development of this agreement. For the Project these Tribes are federally recognized Tribes identified above.

5) Consulting Parties

Consulting Parties in this Agreement refers to additional consulting parties as defined in 36 CFR 800.2(c)(5) "Certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties." as well as representatives of local governments as defined in 36 CFR 800.2(c)(3) "A representative of a local government with jurisdiction over the area in which the effects of an undertaking may occur is entitled to participate as a consulting party. Under other provisions of Federal law, the local government may be authorized to act as the agency official for purposes of section 106."

IV) Deliverables and Review Procedures

- A. FTA shall provide the DAHP, Consulting Tribes and other Consulting Parties thirty (30) calendar days to comment on all findings, determinations, documents, and deliverables unless otherwise specified.
- B. For all findings, determinations, documents, and deliverables submitted during Project construction and directly related to construction activities, DAHP, Consulting Tribes, and other Consulting Parties shall have five (5) business days to review and provide comments, unless otherwise specified.
- C. If the deliverable is a draft document, any written comments provided within the review and comment period shall be considered in the preparation of the final document. If there are any comments that are not feasible to incorporate into the final document, FTA shall provide an explanation to DAHP, Consulting Tribes, and other Consulting Parties as part of issuing the final document. If no comments on a draft document are provided within the specified review timeframe, FTA, at its discretion, may consider the draft document final with notification to DAHP, Consulting Tribes, and other Consulting Parties.

- D. Should FTA and DAHP be unable to reach agreement on eligibility determinations, findings of effect, or resolution of Adverse Effects, FTA shall consult with DAHP to resolve the disagreement in accordance with Stipulation XXX.
- E. All review timeframes may be extended by mutual consent between FTA and DAHP, with notification to other Consulting Tribes and Consulting Parties. Failure of any Consulting Party to respond within the specified timeframe shall not preclude FTA from proceeding to the next step of any process under this Agreement.

V) Area of Potential Effects

- A. In accordance with 36 CFR § 800.4(a)(1) and in consultation with DAHP, Consulting Tribes, and other Consulting Parties, FTA has defined the APE for the Project (Attachment A).
- B. Through the Project design process, and as needed during Project construction, FTA in coordination with Sound Transit, shall determine if revisions to the APE are necessary.
 - 1) If FTA, in coordination with Sound Transit, determines that the APE requires revision it shall submit the APE revision along with any supporting documentation to DAHP for review and comment, and to Consulting Tribes and other Consulting Parties (as appropriate) for review, pursuant to Stipulation IV. FTA's determination on the revised APE shall be final.
 - 2) Revisions to the APE do not require a formal amendment to this Agreement. If revised and documented by FTA pursuant to Paragraph B(1) of this stipulation, then the revised APE shall be used through the remainder of the Project unless further revisions to the APE are necessary.
- C. If any new, previously unsurveyed, areas are added to the APE, the procedures in Stipulation VI shall be followed to identify historic properties that may be affected by the Project.

VI) Survey and Evaluation

- A. Sound Transit in coordination with FTA and in consultation with DAHP, Consulting Tribes, and other Consulting Parties, shall conduct surveys of the APE, including any areas added through revisions under Stipulation V, in order to undertake and complete a reasonable and good faith effort to identify historic properties.
 - 1) Surveys may occur across the Project at different intervals depending on the design and/or construction milestone and may be phased to meet project needs.
 - 2) Sound Transit shall advise FTA if and when additional survey is necessary. In any instance where a property cannot be fully evaluated prior to the initiation of the Project's construction or the resumption of Project activities in the vicinity of the property when identified pursuant to this stipulation, the property may be treated as though it is eligible for inclusion in the NRHP for the purposes of Section 106 review of the Project only. In these instances, and in addition to providing a justification for not performing a full evaluation, FTA shall document the NRHP criterion or criteria, potential area(s) of significance, and boundaries used to assume the property's eligibility so that this information can be used to assess effects of the Project on the historic property pursuant to Stipulation VIII.
 - 3) The survey and evaluation shall be performed by SOI-Qualified professionals appropriate to the resource type(s) being identified and evaluated and shall meet the requirements of Stipulation III.
 - 4) Archaeological surveys will be conducted as described in Stipulation XVI.

- 1 B. Sound Transit shall review the survey results and make NRHP eligibility
2 recommendations to FTA, which shall submit its NRHP eligibility determinations to
3 DAHP, Consulting Tribes, and other Consulting Parties for review and comment
4 pursuant to Stipulation IV. Subject to the confidentiality requirements in Section 304
5 of the NHPA and 36 CFR § 800.11(c), Sound Transit shall post the survey results on
6 the Project website or other publicly accessible electronic platform as appropriate, in
7 order to obtain public input and shall share any comments received from the public
8 with DAHP, Consulting Tribes, and other Consulting Parties. Such documentation will
9 be redacted to not disclose sensitive archaeological information or Tribal knowledge.
10 1) If DAHP does not respond during the applicable review period or if DAHP
11 concurs, FTA's eligibility determination shall become final and effects to
12 historic properties shall be assessed pursuant to Stipulation VIII.
13 2) If FTA and DAHP do not agree on NRHP eligibility of a property, or if FTA and
14 a Tribe that attaches religious and cultural significance to a property do not
15 agree on NRHP eligibility, FTA shall resolve the disagreement pursuant to
16 Stipulation XXX.

17 **VII) Project Design Development and Review**

- 18 A. The Project plans (e.g., drawings specifications, special provisions, appendices,
19 etc.), including plans for temporary construction-related work, shall effectively meet
20 the Project purpose and need, while avoiding, minimizing, and/or mitigating Adverse
21 Effects to historic properties. Project plans analyzed for development of this
22 Agreement have been developed to approximately 10% design.
23 B. At its own discretion, including in response to the request of a Consulting Party, FTA
24 in coordination with Sound Transit, may convene a meeting(s) or use other
25 appropriate means to obtain Consulting Party input on Project design development
26 and effects of the Project on historic properties. If a meeting is held, FTA or Sound
27 Transit shall distribute materials as appropriate in advance of the meeting. These
28 meeting materials may include but are not limited to, agendas, Project plans, and
29 effects assessments. DAHP, Consulting Tribes, and other Consulting Parties may
30 provide input in writing following the receipt of materials during the specified review
31 time and/or during the meeting, if one is held, or both. FTA in coordination with
32 Sound Transit shall record and consider all Consulting Party input received pursuant
33 to this stipulation as Project plans are further developed.
34 C. Sound Transit shall review Project plans at design milestones (e.g., 30, 60, 90, and
35 100%), or equivalent design stages. Sound Transit shall also review any
36 modifications made to the 100% Plans, whether those changes are made prior to, or
37 during Project construction. If a modification of the 100% plans is within the vicinity of
38 a historic property, Sound Transit shall not allow any destructive activities related to
39 the Project modification to begin until reviews under this stipulation and Stipulation
40 VIII are complete. Any submittals to DAHP, Consulting Tribes, and other Consulting
41 Parties shall follow review times as outlined in Stipulation IV. To facilitate review,
42 submittals may be limited to the portions of the Project plans that illustrate the portion
43 of the Project which would potentially adversely affect the previously identified
44 historic properties in Attachment B.
45 1) At each stage of the review, Sound Transit shall recommend to FTA whether
46 revisions are necessary to the APE pursuant to Stipulation V.
47 2) Upon completion of the 30%, 60%, 90%, and 100% plans and in addition to
48 the APE review, pursuant to Paragraph C(1) of this stipulation, Sound Transit
49 shall prepare an assessment of the effects pursuant to Stipulation VIII for
50 submittal along with the appropriate plans to DAHP, Consulting Tribes, and

other Consulting Parties. Based on the nature and scale of the Project changes since the prior design milestone, FTA, at its discretion, may hold a consultation meeting pursuant to Paragraph B of this stipulation. Sound Transit shall assess whether any Project design changes would result in a change to FTA's finding of effect prepared pursuant to Stipulation VIII have been met and whether the plans incorporate previous commitments made to DAHP, Consulting Tribes, and other Consulting Parties, including those made as part of any Mitigation Plan(s) prepared under Stipulation IX.

- a. If the previously made finding of effect remains valid, design-related requirements have been met, and all commitments reached during consultation have been incorporated into Project design, Sound Transit shall notify FTA, who shall notify DAHP, Consulting Tribes, and other Consulting Parties of its findings.
- b. If the previously made finding of effect is no longer valid, design-related requirements have not been met, or if commitments reached during consultation are not incorporated into the Project plans at subsequent stages of design development, FTA shall make a new finding of effect in coordination with Sound Transit pursuant to this stipulation, and proceed to Stipulation IX, if necessary.

VIII) Assessment of Effects on Historic Properties

- A. FTA, in coordination with Sound Transit, shall make a finding of effect for historic properties in the APE based on the Project's 30% plans, or as necessary after the 30% plans have been reviewed, to account for any subsequent changes in the Project design that may result in newly identified historic properties or changes in the finding of effect for a historic property. Sound Transit shall assess effects of the Project on historic properties in accordance with the Criteria of Adverse Effect as described in 36 CFR § 800.5(a)(1) and make a recommendation to FTA, supported by documentation that meets the requirements of Stipulation III(A). Sound Transit shall also recommend to FTA potential measures for avoiding, minimizing, and/or mitigating any Adverse Effect(s).
 - 1) As part of the assessment of effects, Sound Transit may recommend, and FTA may impose, conditions on the Project to ensure an Adverse Effect to a historic property is avoided and/or minimized.
 - a. Conditions to protect a historic property during Project construction shall be considered to avoid and/or minimize potential Adverse Effects and follow Stipulation IX.
 - 2) When unanticipated effects (e.g., damage) occur to a known or newly identified historic property during Project construction, Sound Transit shall use the following guidance in addition to the Criteria of Adverse Effect when making a recommendation to FTA;
 - a. If the damage does not constitute an Adverse Effect as described in 36 CFR 800.5(a)(1), a No Adverse Effect finding shall be recommended.
 - b. If the damage does constitute an Adverse Effect as described in 36 CFR 800.5(a)(1), is repairable, and the property owner agrees to repairing the damage in accordance with the SOI Standards, the Adverse Effect will be resolved pursuant to Stipulation IX.
 - c. If any of the following are true, an Adverse Effect finding requiring resolution under this stipulation shall be recommended:
 - i. The damage involves a National Historic Landmark;

- ii. The damage cannot be repaired;
- iii. The historic property must be demolished in whole or in part;
- iv. The property owner does not consent to repairing the damage in accordance with the SOI Standards;
- v. Either the Project Construction Contractor or Contractor's insurer resolves the damage claim by monetary payment to the property owner in lieu of a repair; or
- vi. The repairs have the potential to cause additional Adverse Effects.

B. FTA shall review Sound Transit's assessment of effects and recommendations, and if acceptable, submit a finding of effect to DAHP, Consulting Tribes, and other Consulting Parties for review pursuant to Stipulation IV. FTA shall clearly state any condition(s) imposed on the Project as part of the finding. Subject to the confidentiality requirements in 54 USC § 307103 and 36 CFR § 800.11(c), Sound Transit shall post the finding of effect on the Project website, or other means as appropriate, in order to obtain public input and shall share any comments received from the public with DAHP, Consulting Tribes, and other Consulting Parties within the review timeframe.

- 1) If FTA makes a finding of No Adverse Effect and DAHP, Consulting Tribes, and other Consulting Parties agree, no further consultation is required pending implementation of any conditions upon which the finding is based. Implementation of conditions shall be tracked as part of quarterly reporting outlined in Stipulation XXVII.
- 2) FTA, at its discretion and based on the nature and scale of the Adverse Effect, may propose the implementation of one or more mitigation measures, to resolve the Adverse Effect pursuant to this stipulation. When applicable, deliverables required as part of a mitigation package shall be prepared in accordance with the requirements of Stipulation III and shall be submitted and reviewed pursuant to the timeline(s) and process outlined in Stipulation IV.
 - a. If DAHP, Consulting Tribes, and other Consulting Parties (as appropriate) agree to the proposed mitigation measure(s), FTA and Sound Transit shall ensure the mitigation measure(s) are carried out in order to resolve the Adverse Effect(s). Implementation of this mitigation measure(s) shall be tracked as part of regular reporting outlined in Stipulation XXVI.
 - b. If DAHP objects to FTA's finding of effect or Consulting Tribes or if other Consulting Parties do not agree with the finding, they shall provide comments to FTA specifying the reasons for their disagreement. FTA shall consult with DAHP, Consulting Tribes, and other Consulting Parties (as appropriate) to resolve the disagreement in accordance with Stipulation XXX.

IX) Consultation to Resolve Adverse Effects

A. FTA shall consult with DAHP, Consulting Tribes, and other Consulting Parties (as appropriate) and the owner of the historic property, if appropriate, to seek and consider other measures to avoid, minimize, and/or mitigate the Adverse Effect. Consultation may take whatever form is appropriate based on the significance, character, and use of the historic property and the nature and scale of the Adverse Effect. The consultation must include an opportunity for the public to express their

views in resolving the Adverse Effect(s). FTA, at its discretion, may determine that public participation under this stipulation is met via public review and comment conducted under the National Environmental Policy Act, as amended, and its implementing regulations.

- 1) If consultation identifies a way to avoid the Adverse Effect(s) entirely through redesign of a Project element or other means, and Sound Transit and FTA agree, Sound Transit shall revise the Project plans and FTA shall reassess effects and modify the finding of effect in accordance with Stipulation VII.
- 2) If through consultation it is determined the Adverse Effect(s) cannot be avoided entirely, a Mitigation Plan shall be prepared under Paragraph B of this stipulation.
- 3) Final measures identified to avoid, minimize, and or mitigate Adverse Effects will be documented and made available for review and comment by the public via the project website or other accessible information portal. Such information is subject to the confidentiality requirements in 54 USC § 307103 and 36 CFR § 800.11(c).

B. FTA, in coordination with Sound Transit, shall develop a Mitigation Plan(s) to document the measures identified through consultation under Paragraph A of this stipulation to resolve the Adverse Effect(s). Mitigation Plan(s) may be prepared for the Project as a whole, for individual construction bid packages, and/or for individual or groups of historic properties, as needed.

- 1) A Mitigation Plan shall outline measures to avoid, minimize, and/or mitigate Adverse Effects to the historic property. These may include, but are not limited to, additional design review pursuant to Stipulation VII or protective measures to avoid or minimize construction and/or operational impacts to historic properties pursuant to Stipulation X. When applicable, deliverables required by a Mitigation Plan shall be prepared in accordance with the requirements of Stipulation III and shall be submitted and reviewed pursuant to the timeline(s) and process outlined in Stipulation IV, or as otherwise specified in the Mitigation Plan.
- 2) Upon completion of consultation, FTA shall submit a draft and final Mitigation Plan to DAHP, Consulting Tribes, and other Consulting Parties (as appropriate), and the property owner, when applicable, pursuant to Stipulation IV. The Mitigation Plan shall be considered final following agreement in writing by both FTA and DAHP. Development, finalization, and implementation of Mitigation Plan do not require a formal amendment to this Agreement. Implementation of the Mitigation Plan shall be tracked as part of quarterly reporting outlined in Stipulation XXVII.
- 3) If FTA and DAHP fail to agree on how to resolve the Adverse Effect, FTA shall consult with DAHP to resolve the disagreement in accordance with Stipulation XXX.
- 4) If required by a Mitigation Plan, construction activities may not begin or resume in the vicinity of the historic property until after completion of the associated field work or implementation of protection measures outlined in the Mitigation Plan.
- 5) For newly identified Adverse Effects, Sound Transit, in coordination with FTA will populate an Adverse Effect acknowledgement form which will identify the nature of the historic property that is adversely affected, the nature of the Adverse Effect, and a summary of the measure(s) developed to resolve Adverse Effect as outlined in the Mitigation Plan pursuant to Stipulation

IX.B(2). The adverse effect acknowledgement form shall be signed by FTA and DAHP but may be signed by invited signatories, as appropriate.

a. Adverse Effect acknowledgement form will be developed by FTA in coordination with Sound Transit and in consultation with DAHP.

X) Construction Protection Plan for Historic Properties

There are cases where historic properties are located within the APE, but FTA has made a finding of No Adverse Effect (Attachment B). When applicable, the following procedures are set forth to protect such historic properties during construction.

- A. Sound Transit in coordination with FTA, and in consultation with DAHP, Consulting Tribes, and other Consulting Parties, and the property owner, when applicable, shall develop a Construction Protection Plan for Historic Properties (CPPHP) detailing the measures to be implemented prior to and during Project construction to avoid or minimize effects to historic properties. The CPPHP may also include measures to assess effects of operations during systems testing and revenue service as appropriate. The CPPHP shall also identify the entity(ies) responsible for carrying out the measures included in the CPPHP.
- 1) The CPPHP may be prepared for the Project as a whole, for individual construction bid packages, and/or for individual or groups of historic properties, as needed.
 - 2) Sound Transit shall submit the draft CPPHP(s) to FTA for review and approval. Once FTA's comments are incorporated, FTA shall submit the draft and final CPPHP(s) to DAHP, Consulting Tribes, and other Consulting Parties pursuant to Stipulation IV. If the CPPHP includes any property-specific protection measures, FTA shall also submit the draft and final CPPHPs to the owner of the historic property pursuant to Stipulation IV. The CPPHP shall be considered final upon acceptance by FTA and shall be distributed to DAHP, Consulting Tribes, other Consulting Parties, and the property owner, when applicable. When necessary, amendments to the CPPHP shall follow the same process as its original development.
- B. Sound Transit shall include the agreed-upon CPPHP in contract packages to inform Project Construction Contractors of their responsibilities relative to historic properties. The CPPHP may be a separate document or combined with other Project construction monitoring plans, as appropriate. Sound Transit shall incorporate the property-specific protection measures into the Project plans, when appropriate, and shall ensure the terms of the CPPHP(s) are implemented.
- C. Depending on the type of historic property, the expected effects, and the conditions or Mitigation Plan(s) as written, Sound Transit may include the following measures in the CPPHP:
- 1) Construction Protection Measures (CPMs) that detail the specific protection measures and procedures to be implemented during Project construction to protect historic properties.
 - 2) Historic Property Inspections (pre-, during, and post-construction) that provide a baseline of existing structural and physical conditions to facilitate identification and documentation of any structural and/or cosmetic damage caused by Project construction. Inspection reports will be shared with DAHP, Consulting Tribes, and other Consulting Parties. Inspections shall include, but are not limited to, building/structure foundations, exterior and interior

elements, topography, landscaping, and any other historically significant or character-defining features of the property to document any pre-existing defects or other damage. Inspection documentation shall include photographs and narrative to document the observed conditions before and after Project construction, and as needed during Project construction. Depending on the type and nature of the historic property and anticipated effects to it, photographic documentation should include, but is not limited to: ceilings, roofs, exterior and interior walls, windows, masonry, foundations, all sides of the exterior of the building, structure and bridge wingwalls, beams, substructures and superstructures, plumbing, equipment, fences and landscape walls, topography, vegetation, driveways and sidewalks, and any historically significant or character-defining features of the property. Photographs shall be appropriately detailed and in focus, properly composed, and with adequate lighting to clearly show existing conditions such as deterioration and cracking that may be subject to dispute after initiation of Project construction. Every attempt shall be made to take photographs that document overall condition from the same location before, during, and after construction, as appropriate.

- 3) Vibration Management and Remediation Measures (VMRMs) to address ground-borne vibration caused by Project construction when it is projected to have a moderate to severe impact under FTA's noise and vibration impact criteria that may result in an Adverse Effect on a historic property. Methods and durations for vibration management are anticipated to be included in the project construction management plan addressing vibration and may be integrated into the CPPHP, as appropriate.
- 4) Other types of potential measures may include but are not limited to: maintenance of property access and noise minimization and mitigation measures when noise caused by Project construction and/or operations is anticipated to have an Adverse Effect on a historic property. Methods and durations for other types of monitoring and impact management are anticipated to be included in the project construction management plan addressing those potential impacts and may be integrated into the CPPHP, as appropriate.

XI) Unanticipated Effects to Known Historic Properties

- A. If previously known historic properties are affected in an unanticipated manner during Project construction, all activities shall cease within a restricted zone to avoid and/or minimize harm to the property. The restricted zone will generally be 50 feet or appropriate distance, based on sensitivity of the resource and to be determined in coordination with the appropriate SOI-qualified cultural resources specialist as described in Stipulation VI.A.3. Sound Transit shall include in Project construction contracts a requirement for the Project Construction Contractor to immediately notify Sound Transit of the effect and implement interim measures to protect the property from damage, looting, and vandalism. Measures may include, but are not limited to: protective fencing, covering of the property with appropriate materials, and/or posting of security personnel. The Project Construction Contractor shall not resume work within the restricted zone until notified by Sound Transit. Sound Transit shall immediately notify FTA. FTA shall then notify DAHP, other Consulting Parties, and the property owner within 24 hours. Sound Transit shall ensure a historic property inspection as described in Paragraph C of this stipulation is prepared as soon as practicable to document damage to the historic property.

- 1 B. If reasonably convenient and appropriate, Sound Transit, DAHP, Consulting Tribes,
2 other Consulting Parties (as appropriate) and the property owner, when applicable,
3 shall confer at the site within forty-eight (48) hours of notice of discovery to assess
4 the property, determine the likely Project effects to the property, and to determine the
5 most appropriate course of action to repair any damage, if feasible.
6 1) The course of action shall specify the type of repair, the review process for
7 the scope of work, and the responsibilities for ensuring repairs are made
8 appropriately, including preparation of a post-construction historic property
9 inspection as described in Paragraph C(2) of this stipulation. The course of
10 action shall also outline where and when it may be safe to resume
11 construction activities within and/or in the vicinity of the historic property.
12 Whenever possible, measures to repair historic properties shall be developed
13 so that they meet the SOI Standards and are carried out under the direct
14 supervision of personnel that meet the requirements described in
15 Stipulation III.
16 2) Within forty-eight (48) hours of the meeting, Sound Transit shall prepare draft
17 meeting notes documenting the results of the onsite meeting and a draft of
18 the proposed course of action and provide them, and the historic property
19 inspection prepared under Paragraph A of this stipulation, to meeting
20 attendees for review. Attendees of the meeting have forty-eight (48) hours to
21 review draft meeting notes, proposed course of action, and provide
22 comments to Sound Transit. Sound Transit shall finalize the meeting notes
23 and course of action within twenty-four (24) hours after receiving comments
24 and provide them to meeting attendees and FTA.
25 C. Once a course of action to repair the damage and further protect the property has
26 been developed and consented to by the Project Construction Contractor and the
27 property owner, FTA in coordination with Sound Transit shall assess effects pursuant
28 to Stipulation VIII. FTA shall review Sound Transit's assessment of effects and
29 recommendations, and if acceptable, submit a finding of effect to DAHP, Consulting
30 Tribes, and other Consulting Parties for review pursuant to Stipulation IV. If
31 necessary, FTA shall resolve any Adverse Effects pursuant to Stipulation IX.

32 **XII) Interpretation of Tribally Important Places in the Duwamish River Valley and**
33 **Surrounding Environs**

- 34 A. Sound Transit, in coordination with FTA and in consultation with DAHP, and
35 Consulting Tribes, will develop and implement an interpretive program that will
36 highlight traditional Coast Salish use of the project vicinity. The subject matter of
37 interpretative program will include precontact use as well as contact-era and modern
38 use to demonstrate the durability of Coast Salish culture and cultural practices
39 including fishing, transportation, settlement, hunting and gathering. The interpretive
40 materials will be developed in consultation with DAHP, Consulting Tribes and other
41 Consulting Parties, as appropriate, and may take the form of a printed materials,
42 story maps, signs or other digital interfaces, but will be focused on providing
43 education to the public in and around station locations, as well as on-board the train,
44 as feasible.
45 1) Sound Transit will prepare a written plan for the interpretive program, which
46 will include a timeline for implementation of its components and a description
47 of proposed content.
48 2) The content of the interpretive materials will be structured to appeal to the
49 general public and to be useful for educational purposes (e.g., it may include
50 interactive components and activities suitable for K-12 students and

educators). By means of keyword indexing, solicited links from other sites, and similar techniques, Sound Transit will work to ensure that this material is readily found by educators and students using search engines.

- 3) Hosting and maintenance of digital components will be determined through on-going consultation pursuant to Stipulation IV of this Agreement.
- 4) The plan for the interpretive program will be made available for review and comment by the public via the project website or other accessible information portal.
- 5) The plan for the interpretive program shall be prepared in accordance with the requirements of Stipulation III.
- 6) A draft of the plan for the interpretive program will be developed for review by DAHP, Consulting Tribes, and other Consulting Parties within 18 months of the execution of this Agreement pursuant to Stipulation IV.
- 7) Up to 2 (two) drafts of the Interpretation Plan are anticipated and will be reviewed by DAHP, Consulting Tribes, and other Consulting Parties pursuant to Stipulation IV.
- 8) The plan for the interpretive program will be completed within one year of the initial draft completion.

B. Plan Implementation

- 1) Within six (6) months of finalization of the plan for the interpretive program, Sound Transit in coordination with FTA will develop a scope of work and Request for Proposals to solicit a consultant to implement the plan.
- 2) With the exception of any specific interpretation measures identified to be executed post-construction in accordance with the plan for the interpretive program, interpretative measures will be completed and implemented prior to official opening of the WSLE.
- 3) Sound Transit will utilize public outreach resources as practical to advertise and promote the interpretative measures to educators, researchers, and the public.
- 4) Up to 2 (two) drafts of the deliverables developed per this plan will be reviewed by DAHP, Consulting Tribes, and other Consulting Parties pursuant to Stipulation IV.

XIII) Native Plantings and Plant Salvage

A. Sound Transit in coordination with FTA, and in consultation with DAHP and Consulting Tribes will identify areas within the APE that require vegetation removal and revegetation/restoration. These areas will be identified through design review and project updates pursuant to Stipulations VII and XXVII. The Consulting Tribes will provide a list of native species of interest to Sound Transit for consideration and incorporation into the Project planting plan, as practicable. This stipulation will be considered complete after Sound Transit completes the plantings and provides the Consulting Tribes and DAHP an accounting of the finished plantings.

- 1) Prior to clearing and grading, Consulting Tribes may provide a list of plants of interest which may be salvaged by individual Tribes. If these plants are known within the APE and salvage is practical, Sound Transit, in coordination with FTA, DAHP and Consulting Tribes will, as practical, provide access for Tribal representatives to salvage appropriate plants.
- 2) Sound Transit and its construction contractor will develop a list of locations within the APE where restoration and landscaping activities will occur. These areas will be shared with Consulting Tribes and DAHP.

- 3) Consulting Tribes in coordination with Sound Transit and FTA, will develop a list of plants that are desirable for restoration and landscaping. These plants are anticipated to be primarily native to the Puget Sound region.
- 4) Sound Transit will, as practical, incorporate plants on the list developed by Tribes into the restoration and landscaping designs. Landscaping designs will be reviewed by Consulting Tribes and DAHP pursuant to Stipulation IV.

XIV) Ethnographic Collections

- A. Sound Transit, in coordination with FTA and in consultation with DAHP and Consulting Tribes will develop a plan for assessing and addressing each of the Consulting Tribes' needs for research and documentation of their own existing ethnographic collections. Each Consulting Tribe will develop a list of needs, which may be kept confidential, but will be used to identify the need for support. Needs may include but are not limited to: dictation or translation of recorded interviews, inventory of existing collections, conduct research and interview Tribal members with specialized knowledge of the APE.
- B. A requesting Tribe shall submit a brief scope of work and funding request to FTA and Sound Transit within a period of three years following execution of this agreement. FTA will review the scope of work and funding agreement between Sound Transit and the requesting Tribe to ensure the proposed funded activities meet the requirements of Stipulation XIV.A.
- C. Any deliverable or product generated under this funding agreement will remain the sole property of the requesting Tribe and may be kept confidential in accordance with Federal (Section 304 of the National Historic Preservation Act) and State (Revised Code of Washington (RCW) 42.56.300) laws and regulations as appropriate.

XV) Traditional Transportation Gathering

- A. Traditionally Coast Salish peoples relied on canoes for transportation. Modern activities associated with canoes and canoe racing have helped to ally Coast Salish peoples. Sound Transit, in coordination with FTA and in consultation with DAHP and Consulting Tribes will develop a plan to financially support annual traditional canoe races for a period of up to five (5) years with one race event supported annually. Sound Transit will assist in initial plan development but logistics and annual coordination will be the responsibilities of the Consulting Tribes. The location, timing, and duration of this event may change annually or may be consistent for the five years.
 - 1) The Canoe Race Plan will include a timeline for implementation of its components.
 - 2) Hosting and logistics for the plan will be determined through on-going consultation pursuant to Stipulation IV of this Agreement. This consultation will establish which Tribe(s) host and plan the event which may alternate among Tribes.
 - 3) Support identified here may be used for established canoe race events or used to establish new canoe race events.
 - 4) Because the plan may include sensitive cultural information (e.g., ceremonial components of events), circulation of the plan will be limited to Sound Transit, FTA, Consulting Tribes and DAHP (as appropriate).
 - 5) A draft of the Plan will be developed by Sound Transit for review by FTA, DAHP, and Consulting Tribes, within 18 months of the execution of this Agreement pursuant to Stipulation IV.

- 6) Up to 2 (two) drafts of the Plan are anticipated and will be reviewed by FTA, Sound Transit, DAHP and Consulting Tribes, pursuant to Stipulation IV.
- 7) The Final Canoe Race Plan will be completed within one year of the initial draft completion.

B. Plan Implementation

- 1) Within six (6) months of finalization of the Plan, Sound Transit in coordination with FTA will develop a scope of work and Request for Proposals to solicit a consultant to implement the plan.
- 2) Sound Transit will provide financial assistance for developing public outreach materials to promote and advertise the event to the public, as appropriate.
- 3) Up to 2 (two) drafts of the deliverables developed per this plan will be reviewed by FTA, DAHP, and Consulting Tribes, pursuant to Stipulation IV.
- 4) Funding for planning and support of the annual Canoe Race will be determined through consultation with Consulting Tribes, in accordance with Stipulation IV(A). FTA will review the scope of work and funding agreement between Sound Transit and Consulting Tribes to ensure the proposed funded activities meet the requirements of Stipulation XV.A and B.
- 5) Sound Transit shall not retain any responsibility, financial or otherwise, to support annual traditional canoe races beyond a period of five years after the Final Canoe Race plan has been implemented

XVI) Identification and Evaluation of Archaeological Properties

Inventory and evaluation of potential archaeological resources have not been completed for all areas of the Project where ground disturbance may occur. Some areas of expected ground disturbance are on property where access could not be secured prior to acquisition of the property. Some areas of expected ground disturbance are beneath existing infrastructure (buildings, utilities, and other obstructions) that cannot feasibly be removed until construction. Finally, it is possible that design changes could result in additional areas of ground disturbance. The plans described below will be prepared in Consultation with DAHP, Consulting Tribes, and Consulting parties, as appropriate.

A. An Archaeological Treatment Plan (Treatment Plan) and Archaeological Monitoring Plan (Monitoring Plan) together detail processes for the following:

- 1) Archaeological investigations to occur prior to and during construction;
- 2) Archeological monitoring of construction activities; and
- 3) Procedures for addressing inadvertent discoveries of archaeological resources as well as human remains.

B. The Treatment Plan:

- 1) Identifies ground disturbing project elements, describing both vertical and horizontal extent of ground disturbance including a discussion of the nature of spoils produced, as appropriate;
- 2) Provides detail regarding known subsurface geologic conditions including detailed consideration of geoarchaeology based on existing data;
- 3) Identifies specific areas of elevated archaeological probability within the APE;
- 4) Identifies specific ground disturbing elements of the Project within each of the areas of elevated probability;
- 5) Makes recommendations for archaeological investigations based on archaeological sensitivity and anticipated ground disturbance;
- 6) Describes a process for developing and implementing specific work plans for each archaeological investigation and/or archaeologically sensitive area;

- 7) Describes a process for NRHP evaluation of newly identified archaeological resources in consultation with DAHP, Consulting Tribes, and other Consulting Parties (as appropriate);
- 8) Describes a process for assessing effects to newly identified NRHP-eligible archaeological resources in consultation with DAHP, Consulting Tribes, and other Consulting Parties (as appropriate); and
- 9) Identifies laboratory and curation procedures for archaeological resources.

XVII) Consultation to Avoid, Minimize, or Mitigate Adverse Effects on Archaeological Resources

- A. FTA in coordination with Sound Transit and in consultation with DAHP, Consulting Tribes, and other Consulting Parties (as appropriate) will apply the criteria of Adverse Effect (36 CFR § 800.5(a)(1)) to NRHP-eligible archaeological properties within the APE pursuant to Stipulation VIII, and document its findings pursuant to Stipulation IV.
- B. If FTA determines that the Project will have an Adverse Effect on any NRHP-eligible archaeological resources, FTA, in coordination with Sound Transit, will consult with DAHP, Consulting Tribes, and other Consulting Parties (as appropriate) to explore measures to avoid, minimize, or mitigate Adverse Effects pursuant to Stipulation IX. FTA, in coordination with Sound Transit, will ensure the implementation of any modifications or conditions to avoid or minimize Adverse Effects agreed upon through consultation.
- C. If Adverse Effects cannot be avoided, mitigation measures will be developed in consultation among FTA, Sound Transit, DAHP, Consulting Tribes, and other Consulting Parties (as appropriate) pursuant to Stipulation IX. Mitigation measures may include but are not limited to data recovery, development of interpretive materials including art, and educational information. A Mitigation Plan will be developed to outline agreed upon mitigation pursuant to Stipulation IX(B). Plans may include treatment measures for one or more than one resource and will be subject to review pursuant to Stipulation IV.
- D. FTA and Sound Transit will continue to consult with Consulting Tribes to address potential effects to Tribally known resources where impacts may not be observable.

XVIII) Public Interpretation of the Transportation, Social, Economic, and Cultural History of the Duwamish River/Waterway Corridor in the Duwamish Segment Area

Sound Transit, in coordination with FTA and in consultation with DAHP, Consulting Tribes, and other Consulting Parties, will develop and implement a plan for an interpretive tool that will highlight transportation, social, economic, and cultural history in and around the Project vicinity. The final format of the interpretive tool will be developed in consultation with DAHP, Consulting Tribes and other Consulting Parties and may take the form of printed material, story map or other digital interface, and will be focused on providing education to the public regarding past uses and the unique development history in the vicinity of the project. Interpretive materials will highlight the contributions that historically marginalized communities have made to the project vicinity over time as well as how development impacted those communities and their ways of life.

A. Interpretation Plan Development

Sound Transit, in coordination with FTA and in consultation with DAHP, Consulting Tribes, and other Consulting Parties, will develop an interpretation plan ("Interpretation Plan") to interpret and present the history of the Duwamish watershed in the vicinity of the Project for the public. In addition to generating new information, the Interpretation Plan will build upon the use of information already gathered during

recent infrastructure projects within the Puget Sound area to maximize recent interpretative efforts and time commitment from DAHP, Consulting Tribes, and other Consulting Parties. The Interpretation Plan will develop multiple ways to encounter and interact with historical information regarding the area(s) within, affected by, and developed due to the Duwamish River/Waterway corridor. Specific goals of and milestones for the Interpretation Plan development are outlined below and will be implemented by Sound Transit in coordination with FTA and in consultation with DAHP, Consulting Tribes, and other Consulting Parties (as appropriate):

- 1) The Interpretation Plan will include a timeline for implementation of its components.
- 2) The content of the interpretive materials will be structured to appeal to the general public and to be useful for educational purposes (e.g., it may include interactive components and activities suitable for K-12 students and educators). By means of keyword indexing, solicited links from other sites, and similar techniques, Sound Transit will ensure that this material is readily found by educators and students using search engines.
- 3) Hosting and maintenance of digital components will be determined through on-going consultation pursuant to Stipulation IV of this Agreement.
- 4) The interpretation plan will be made available for review and comment by the public via the project website or other accessible information portal.
- 5) The Interpretation plan shall be prepared in accordance with the requirements of Stipulation III.
- 6) A draft of the interpretation plan will be developed for review by DAHP, Consulting Tribes, and other Consulting Parties within 18 months of the execution of this Agreement pursuant to Stipulation IV.
- 7) Up to 2 (two) drafts of the Interpretation Plan are anticipated and will be reviewed by DAHP, Consulting Tribes, and other Consulting Parties pursuant to Stipulation IV.
- 8) The Final Interpretation plan will be completed within one year of the initial draft completion.

B. Plan Implementation

- 1) Within six (6) months of finalization of the Interpretation Plan, Sound Transit in coordination with FTA will develop a scope of work and Request for Proposals to solicit a consultant to implement the plan.
- 2) With the exception of interpretation measures identified to be executed post-construction in accordance with the Interpretation Plan, interpretative measures will be completed and implemented prior to official opening of the WSLE.
- 3) Sound Transit will utilize public outreach resources as practicable to advertise and promote the interpretative measures to educators, researchers, and the public.
- 4) Up to 2 (two) drafts of the deliverables developed per this plan will be reviewed by DAHP, Consulting Tribes, and other Consulting Parties pursuant to Stipulation IV.
- 5) Deliverables developed from plan implementation will be input in the appropriate database pursuant to Stipulation III.F and III.G

XIX) Historic Context Study of the Industrial Development of West Seattle and the Duwamish Waterway vicinity

- A. Sound Transit will develop a historical context of the Industrial Development of West Seattle and the Duwamish Waterway vicinity. The context will include historical background on the development of industry in the West Seattle and Duwamish Waterway including information from the 19th and 20th centuries and how this industry contributed to local, national, and international events with special emphasis on the project vicinity. Additionally, this context will include a discussion of previously identified and evaluated industrial properties in the area and recommendations for future evaluations of these properties.
- B. This context study will be developed by an SOI-qualified architectural historian in accordance with the National Park Service (NPS) 2009 White Paper on Historic Contexts, National Register Bulletin 16b and other best practices on historic context studies.
- C. Sound Transit will develop a draft historical context and submit it to DAHP, Consulting Tribes, and other Consulting Parties for review within one year of execution of this Agreement execution. That draft will be reviewed by DAHP, Consulting Tribes, and other Consulting Parties pursuant to Stipulation IV.
- D. Up to 2 (two) drafts of the context are anticipated and will be reviewed by DAHP, Consulting Tribes, and other Consulting Parties pursuant to Stipulation IV.
- E. The final context document will be completed within one year of the initial draft completion.
- F. Disposition of final document will be determined in consultation with DAHP, Consulting Tribes, and other Consulting Parties (as appropriate).
- G. Deliverables developed from plan implementation will be input in the appropriate database pursuant to Stipulation III.F and III.G

XX) Mitigation for All Demolished Resources

- A. Sound Transit anticipates demolition of the buildings identified in this stipulation. The timing and specific duration of demolition activities will be determined after execution of this Agreement but will be identified and communicated to DAHP, Consulting Tribes, and other Consulting Parties pursuant to Stipulation VII. Sound Transit will implement specific mitigation measures identified in Paragraphs B and C of this stipulation for each building that will be demolished:
 - 1) Alaskan Copper Company, 2958 6th Avenue South
 - a. Employment Office (WISAARD Property ID 342997)
 - b. Auto Repair Garage (WISAARD Property ID 721997)
 - 2) Graybar Electric Company, 1919 6th Avenue South (WISAARD Property ID 720609)
 - 3) Pacific Forge Company/Bethlehem Steel Nut and Bolt Factory Historic District, 3800 West Marginal Way Southwest
 - a. Office (WISAARD Property ID 721620)
 - b. Forge Building (WISAARD Property ID 721624)
 - c. North Warehouse (WISAARD Property ID 721625)
 - d. South Warehouse (WISAARD Property ID 721628)
 - e. East Warehouse (WISAARD Property ID 721629)
 - 4) Spokane Street Manufacturing Historic District

- a. Acme Tool Works at 3626 East Marginal Way South¹ (WISAARD Property ID 720511)
- b. Edwards Ice Machine Co./Eagle Metals Co. at 3628 East Marginal Way South (WISAARD Property ID 342293)
- c. Simmons Company Metal Beds, Springs & Mattress Warehouse at 99 South Spokane Street (WISAARD Property ID 344500)
- d. Lindmark Machine Works at 3626 East Marginal Way South (WISAARD Property ID 720513)
- e. Air Reduction Company at 3623 East Marginal Way South (WISAARD Property ID 38527)
- f. Air Reduction Company Carbide Storage Building at 3621 East Marginal Way South (WISAARD Property ID 720564)
- g. Air Reduction Company Auto Repair Garage at 3621 East Marginal Way South (WISAARD Property ID 720563)
- h. Light Industrial Building at 3633 East Marginal Way South (WISAARD Property ID 720542)

- B. Sound Transit will prepare DAHP Level II Documentation for each historic structure to be demolished as listed above under Stipulation XX.A. At a minimum this documentation will include historical background information, drawings, maps, photographs, and other information as outlined by DAHP's Mitigation Documentation Standards document. This documentation will be reviewed by DAHP, Consulting Tribes, and other Consulting Parties (as appropriate), pursuant to Stipulation IV. This documentation will be offered to state and/or federal repositories for their archives. This information will also be available for public access via the project website or other accessible information portal.
- C. Prior to and during the demolition phase(s) of the Project, Sound Transit, to the extent practicable, will work with individuals or entities interested in salvaging raw materials from historic properties being demolished. It is anticipated that Sound Transit will coordinate with Seattle Department of Construction and Inspection for salvage assessments during permitting. Additionally, FTA and Sound Transit, in consultation with DAHP, Consulting Tribes, and other Consulting Parties, will assess the feasibility of this throughout the design phase of the Project pursuant to Stipulation VII.

XXI) Mitigation for Adverse Effects to Cettolin House, 4022 32nd Avenue Southwest (WISAARD ID 721984)

- A. Sound Transit will develop a historic context focusing on migration to West Seattle and the contributions of immigrant communities to the area during the first half of the twentieth century, the period when the Cettolin family moved to the region and contributed to the industry in region. Additionally, this context will include, but is not limited to a discussion of previously identified and evaluated properties associated with these communities in West Seattle, extant residences, commercial and industrial business where they worked, recommendations for future local and national heritage register evaluations of properties they are associated with and criteria for evaluating those properties.
- 1) Sound Transit will develop a draft historical context and submit it to DAHP, Consulting Tribes, and other Consulting Parties for review within one year of

¹ Also individually eligible for listing in the NRHP

- 1 execution of this Agreement. That draft will be reviewed by DAHP, Consulting
- 2 Tribes, and other Consulting Parties pursuant to Stipulation IV.
- 3 2) Up to 2 (two) drafts of the context are anticipated and will be reviewed by
- 4 DAHP, Consulting Tribes, and other Consulting Parties pursuant to Stipulation
- 5 IV.
- 6 3) The final context document will be completed within one year of the initial
- 7 draft completion.
- 8 4) Disposition of the final document will be determined in consultation with
- 9 DAHP, Consulting Tribes, and other Consulting Parties (as appropriate).
- 10 B. Sound Transit in coordination with FTA and in consultation with DAHP, Consulting
- 11 Tribes, and other Consulting Parties (as appropriate) will develop landscape design
- 12 plans to address concerns regarding effects to setting in the immediate vicinity of the
- 13 Cettolin House. Such plans may include specific treatments to noise mitigation walls,
- 14 plantings, grading, etc. These plans will be reviewed pursuant to Stipulation VII.
- 15 Efforts will be made to reduce visual and auditory impacts to the Cettolin House
- 16 when the project is in revenue service. Additional measures to address visual,
- 17 auditory, and vibration impacts are addressed in Stipulation XXIV.
- 18 C. A specific CPPHP (Stipulation X) will be developed for the Cettolin House to ensure
- 19 no additional Adverse Effects are incurred by the resource. The Cettolin House will
- 20 be subject to pre- and post-construction conditions assessment, as well as vibration
- 21 and noise monitoring during construction. Noise, vibration, and other monitoring is
- 22 also anticipated to occur during system testing and revenue service but will not
- 23 exceed durations of revenue service monitoring identified in the appropriate
- 24 construction management plan as identified in Stipulation XXIV. The Cettolin House
- 25 CPPHP may also include measures to assess effects of operations during system
- 26 testing and revenue service as appropriate. Acceptable thresholds of noise and
- 27 vibration will be identified in the appropriate construction management plans
- 28 (Stipulation XXIV). If additional effects are incurred, they will be assessed pursuant
- 29 to Stipulation VIII and resolved pursuant to Stipulation IX.

30 **XXII) Historic Database Infrastructure Support**

- 31 A. Sound Transit shall provide monetary assistance in an amount not to exceed a total
- 32 of \$500,000.00 between DAHP and the City of Seattle to enhance the functionality of
- 33 their historic resources database(s). Increased functionality and interoperability
- 34 between their respective databases will be a public benefit and benefit to Sound
- 35 Transit because it will facilitate decreased review times and increased transparency
- 36 in Project review and permitting. DAHP or the City of Seattle, as appropriate, shall
- 37 provide the applications' beta version to Sound Transit, and FTA prior to deployment
- 38 of the system in order to assess functionality and provide transparency prior to the
- 39 systems' use.
- 40 B. Sound Transit will transfer the funds to DAHP and the City of Seattle to administer,
- 41 as appropriate. Sound Transit's responsibility under this stipulation will be completed
- 42 once the funding has been transferred and FTA receives confirmation from the DAHP
- 43 or the City of Seattle, as appropriate.
- 44 C. DAHP and the City of Seattle will receive and administer the mitigation funds. DAHP
- 45 and the City of Seattle will keep an account of all costs associated with the mitigation
- 46 funding account, including associated overhead/administrative costs. Mitigation
- 47 funds shall be transferred from Sound Transit to DAHP and the City of Seattle
- 48 immediately after an agreement authorizing the transfer of funds is approved by
- 49 Sound Transit.

- 1 D. At least once a year, until implementation of this stipulation is complete, from the
2 date of the execution of this Agreement, DAHP and the City of Seattle will email an
3 annual accounting of funds using their respective accounting procedures to Sound
4 Transit and FTA.
5 E. DAHP and the City of Seattle, as appropriate, will provide a final report on the
6 project, and an account of the funding, to the Signatories by either the closing date of
7 the Agreement or at the completion of funding expenditures.

8 **XXIII) Historic Utilities**

9 Sound Transit will conduct survey and inventory work to identify extant subsurface
10 historic utilities within the APE that may be encountered during ground disturbing
11 activities related to project construction but not specifically those which may be
12 encountered during design development activities (e.g., "potholing for utilities"). These
13 historic utilities will be evaluated for NRHP eligibility pursuant to Stipulation VI and
14 effects to those utilities, if any, will be assessed pursuant to Stipulation VIII and resolved
15 pursuant to Stipulation IX. This work may be conducted in stages following design
16 milestones (e.g., 30%, 60%, 90%, 100%). Historic utilities still in use will be documented
17 on historic property inventory forms consistent with DAHP guidance. Abandoned or
18 remnant utilities, no longer in use, will be documented as an archaeological resource
19 and evaluated pursuant to Stipulation VI of this agreement and if they are NRHP eligible
20 consultation to assess and resolve Adverse Effects will follow procedures outlined in
21 Stipulations VIII and IX respectively.

22 **XXIV) Construction Management Plans**

- 23 A. Potential Construction Management Plans requiring Consulting Party review may
24 include but are not limited to: haul routes, construction staging, noise, lighting and
25 glare, vibration, installation of landscaping, natural and/or cultural resources
26 mitigation where Adverse Effects to historic properties are possible. As design on the
27 project advances, potential effects to historic properties will be regularly assessed
28 pursuant to Stipulation VII. As such, the design and construction contractors are
29 anticipated to develop control plans for these effects. FTA and Sound Transit will
30 share these plans with DAHP, Consulting Tribes, and other Consulting Parties.
31 These plans will be reviewed pursuant to IV. Anticipated plans include:
32 1) Hauling plan(s)
33 2) Construction staging
34 3) Noise
35 4) Lighting and glare
36 5) Vibration monitoring
37 6) Landscaping
38 7) Natural resource mitigation plans

39 **XXV) Inadvertent Discoveries**

- 40 A. Should human remains, funerary objects, sacred objects, or objects of cultural
41 patrimony be discovered at any time prior to or during construction, all ground
42 disturbing activities within at least 50 feet of the discovery location will cease
43 immediately. Sound Transit and its respective contractors shall follow the procedures
44 in the Inadvertent Discovery Plan identified in Stipulation XVI.A.3
45 B. Should archaeological resources be discovered during construction activities, all
46 ground disturbing work within at least 50 feet of the discovery location will cease and

1 Sound Transit and its respective contractors will follow procedures in the in the
2 Inadvertent Discovery Plan identified in Stipulation XVI.A.3..

3 **XXVI) Cultural Resources Orientation**

- 4 A. Prior to construction, Sound Transit shall conduct cultural resources orientation to
5 ensure that all construction-related commitments in this Agreement are properly
6 tracked and executed. This orientation will be directed towards Sound Transit
7 contractors and subcontractors assigned to the Project and responsible for
8 overseeing construction. In addition, Sound Transit shall conduct mandatory
9 orientation for the on-site construction managers, supervisors, inspectors, field
10 crews, and archaeological and Tribal monitors, for purposes of awareness and
11 sensitivity to archaeological resources and other cultural resources in the APE.
12 B. The purpose of the orientation will be to inform construction management,
13 supervisors, inspectors, and field crews of their role and responsibility to report
14 suspected archaeological resources or human remains encountered during
15 construction activities, and the procedures that must be followed to ensure against
16 further disturbance until the discovery is resolved. The orientation will be based on
17 the process outlined in the Archaeological Monitoring, Identification and Treatment
18 Plan (Attachment C) which includes an inadvertent discovery plan.
19 C. Sound Transit SOI-Qualified persons shall develop the specific content, format, and
20 outcomes of the orientation in consultation with FTA and DAHP, Consulting Tribes,
21 and other Consulting Parties (as appropriate).
22 D. The first draft of the orientation program will be developed no later than 120 days
23 after the execution of this Agreement.
24 E. Up to 2 (two) drafts of the orientation program will be developed and reviewed by
25 DAHP, Consulting Tribes, and other Consulting Parties pursuant to Stipulation IV.

26 **XXVII) Reviewing and Reporting of Agreement Implementation**

- 27 A. Every three (3) months following the execution of this Agreement and until it expires
28 or is terminated, Sound Transit shall provide FTA, DAHP, Consulting Tribes, and
29 other Consulting Parties a summary report detailing work undertaken pursuant to its
30 terms. Subject to the confidentiality requirements in 54 USC § 307103 and 36 CFR §
31 800.11(c), each report shall include an itemized listing of all measures required to
32 implement the terms of this Agreement. Each report shall also include a timetable of
33 activities proposed for implementation within the following reporting period and, as
34 applicable, notices of the initiation of construction for individual construction bid
35 packages.
36 B. DAHP, Consulting Tribes, and other Consulting Parties shall review the reports
37 pursuant to the timelines established in Stipulation IV. Sound Transit shall notify the
38 public via the Project website or other publicly accessible format, as appropriate,
39 about the publication of the quarterly reports and that the reports are available for
40 inspection and review upon request. Sound Transit shall share any comments
41 received from the public with DAHP, Consulting Tribes, and other Consulting Parties.
42 C. At its own discretion, or at the request of any Signatory, FTA shall convene a meeting
43 to facilitate review and comment on the reports, and to resolve any questions about
44 their content and/or to resolve objections or concerns.
45 D. FTA in coordination with Sound Transit will hold annual project meetings with DAHP
46 staff including the State Historic Preservation Officer to share information on the
47 project. Attendees may include technical staff and leadership at FTA, Sound Transit,
48 DAHP, as well as Consulting Tribes and Consulting Parties.
49

XXVIII) Collection and Curation

If archaeological resources are collected, and FTA and Sound Transit, in consultation with DAHP, Consulting Tribes, and other Consulting Parties (as appropriate), determines them to be significant and worthy of preservation, and DAHP agrees, any costs associated with the collection, preparation and curation of artifacts shall be the responsibility of Sound Transit. Sound Transit will ensure that collections are accessioned at a facility meeting the requirements of 36 CFR 79, Curation of Federally Owned or Administered Archaeological Collections, unless otherwise indicated by state or local law. Sound Transit and FTA will consult with DAHP, Consulting Tribes, and other Consulting Parties (as appropriate) on facilities for curation. Per Revised Code of Washington (RCW) 27.53, artifacts recovered from private property are the property of the landowner. Disposition of such artifacts recovered during the project will be determined by FTA in consultation with the landowner. Additional information on curation is included in the Treatment Plan (Attachment C).

XXIX) Duration

- A. This Agreement shall remain in effect from the date of execution for a period not to exceed ten (10) years. If FTA anticipates that the terms of this Agreement shall not be completed within this timeframe, it shall notify DAHP, Consulting Tribes, and other Consulting Parties in writing at least sixty (60) calendar days prior to this Agreement's expiration date. This Agreement may be extended by the written concurrence of the Signatories.
- B. FTA shall ensure the Agreement is extended if all the stipulations have not been completed. If this Agreement expires and FTA elects to continue with the Project, FTA shall reinitiate Section 106 consultation in accordance with 36 CFR Part 800.
- C. If, prior to the expiration date, FTA determines all the activities subject to this Agreement are completed, including but not limited to implementation of any mitigation measures, then FTA may terminate this Agreement pursuant to Stipulation XXXII.

XXX) Dispute Resolution

- A. Should any Signatory object at any time to any actions proposed or the manner in which the terms of this Agreement are implemented, FTA shall consult with such party to resolve the objection for a period not to exceed fifteen (15) calendar days. This resolution timeframe may be extended by mutual consent between FTA and the Consulting Party, with notification to the DAHP, Consulting Tribes, and other Consulting Parties.
- B. If FTA and DAHP do not agree on the NRHP eligibility of a property, or if FTA and a Tribe that attaches religious and cultural significance to a historic property do not agree on a property's NRHP eligibility, FTA shall submit documentation to the Keeper of the NRHP and request a formal determination of eligibility pursuant to 36 CFR Part 63 and 36 CFR § 800.4(c)(2). The Keeper's eligibility determination shall be considered final.
- C. If FTA and DAHP, Consulting Tribes, or other Consulting Parties do not agree on findings of effect or resolutions of Adverse Effects, FTA shall forward all documentation relevant to the dispute, including FTA's proposed resolution, to DAHP, Consulting Tribes, and other Consulting Parties and the ACHP.
 - 1) The ACHP shall provide FTA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FTA shall prepare a written response that

1 takes into account any timely advice or comments regarding the dispute from
2 the ACHP and DAHP, Consulting Tribes, and other Consulting Parties and
3 provide them with a copy of this written response. FTA shall then proceed
4 according to its final decision.

- 5 2) If the ACHP does not provide its advice regarding the dispute within thirty (30)
6 days, FTA may make a final decision on the dispute and proceed accordingly.
7 Prior to reaching such a final decision, FTA shall prepare a written response
8 that takes into account any timely comments regarding the dispute from
9 DAHP, Consulting Tribes, and other Consulting Parties and provide them and
10 the ACHP with a copy of such written response.

11 D. FTA's responsibility to carry out all other actions subject to the terms of this
12 Agreement that are not the subject of the dispute shall remain unchanged.

- 13 E. If a member of the public raises an objection in writing pertaining to implementation
14 of this Agreement, FTA shall notify all parties to this Agreement in writing of the
15 objection. Unless otherwise agreed upon, DAHP, Consulting Tribes, and other
16 Consulting Parties have fifteen (15) calendar days to review and provide written
17 comments on the objection to DAHP, Consulting Tribes, and other Consulting
18 Parties. FTA shall consider the objection and take all comments from all parties into
19 consideration in reaching its decision on the objection. Within fifteen (15) calendar
20 days following closure of the comment period, FTA shall render a decision regarding
21 the objection, respond to the objecting party, and proceed according to its decision.
22 FTA's decision regarding resolution of the objection shall be final.

23 **XXXI) Amendments**

24 This Agreement may be amended when such an amendment is agreed to in writing by
25 all Signatories and Invited Signatories. The amendment shall be effective on the date of
26 the final signature by the Signatories and Invited Signatories. Copies of any
27 amendments shall be provided to Consulting Tribes and other Consulting Parties and the
28 ACHP.

29 **XXXII) Termination**

- 30 A. If all terms of this Agreement have been completed prior to the expiration date, FTA
31 may terminate the Agreement with notification to Signatories, Invited Signatories, and
32 Concurring Parties that the terms of the Agreement have been completed. If any
33 Signatory or Invited Signatory feels Agreement termination is premature, or that the
34 terms of the Agreement have not been met, they shall respond within the timeframes
35 outlined in Stipulation IV.
36 B. Any Signatory or Invited Signatory may terminate this Agreement by providing at
37 least thirty (30) calendar days notice to Consulting Tribes and other Consulting
38 Parties. FTA shall consult with the Signatories and Invited Signatories during the
39 thirty (30) calendar day notice period in an attempt to seek agreement on
40 amendments or other actions that would avoid termination.

41 **XXXIII) Execution**

- 42 A. This Agreement may be executed in counterparts, with a separate page for each
43 Signatory, Invited Signatory, and Concurring Party. This Agreement shall become
44 effective on the date of the final signature by the Signatories and Invited Signatories.
45 The refusal of any party invited to concur with this Agreement does not invalidate this
46 Agreement. FTA shall ensure each Consulting Party is provided with a fully executed
47 copy of this Agreement and that the final Agreement, updates to appendices, and
48 any amendments are filed with the ACHP.

1 B. Execution of this Agreement by FTA and DAHP, and implementation of its terms is
2 evidence that FTA has taken into account the effects of its Project on historic
3 properties and has afforded the ACHP opportunity to comment pursuant to Section
4 106 of the National Historic Preservation Act.

5
6 **XXXIV) Coordination with Other Federal Reviews**

7 In the event that another federal agency not initially a party to or subject to this PA
8 receives an application for funding/license/permit associated with the Project as
9 described in this PA, that agency may fulfill its Section 106 responsibilities by stating in
10 writing it concurs with the terms of this PA and notifying the FTA, SHPO, and the Council
11 that it intends to do so. The FTA will confirm in writing that the FTA accepts Lead Agency
12 status for Section 106. Such agreement shall be evidenced by implementation of the
13 terms of this PA and attachments.

Signature Page

**PROGRAMMATIC AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION,
THE WASHINGTON STATE DEPARTMENT OF ARCHAEOLOGY AND HISTORIC
PRESERVATION, AND THE CENTRAL PUGET SOUND REGIONAL TRANSIT AUTHORITY
IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE WEST SEATTLE LINK EXTENSION PROJECT
SEATTLE, KING COUNTY, WASHINGTON**

Signatory

Federal Transit Administration, Region 10

Signed by:
By: Susan Fletcher
F6B39953F95177F...

Date: 1/16/2025

Susan Fletcher (Regional Administrator)

Signature Page

**PROGRAMMATIC AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION,
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IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE WEST SEATTLE LINK EXTENSION PROJECT
SEATTLE, KING COUNTY, WASHINGTON**

Signatory

Department of Archaeology and Historic Preservation

Signed by:
By: Dr Allyson Brooks
F699D9CFDE1425...

Date: 2/25/2025

Allyson Brooks, PhD (State Historic Preservation Officer)

Signature Page

**PROGRAMMATIC AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION,
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IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE WEST SEATTLE LINK EXTENSION PROJECT
SEATTLE, KING COUNTY, WASHINGTON**

Concurring Party

Muckleshoot Tribe of Indians

By: _____



Honorable Jaison Elkins (Chairman)

Date: _____

2-10-25

Signature Page

**PROGRAMMATIC AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION,
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IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE WEST SEATTLE LINK EXTENSION PROJECT
SEATTLE, KING COUNTY, WASHINGTON**

Concurring Party

Suquamish Indian Tribe of the Port Madison Reservation

By:  F19A5D9A5D7A4A4...

Date: 02/26/2025


Honorable Leonard Forsman (Chairman)

Signature Page

**PROGRAMMATIC AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION,
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IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE WEST SEATTLE LINK EXTENSION PROJECT
SEATTLE, KING COUNTY, WASHINGTON**

Concurring Party

City of Seattle

Signed by:
By: 
E5677233D3F743B...

Date: 1/21/2025

Sarah Sodt (Historic Preservation Officer)

Signature Page

**PROGRAMMATIC AGREEMENT AMONG THE FEDERAL TRANSIT ADMINISTRATION,
THE WASHINGTON STATE DEPARTMENT OF ARCHAEOLOGY AND HISTORIC
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IMPLEMENTING SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE WEST SEATTLE LINK EXTENSION PROJECT
SEATTLE, KING COUNTY, WASHINGTON**

Invited Signatory

Central Puget Sound Regional Transit Authority

Signed by:
By: Goran Sparrman
BAA3630C92D2418...

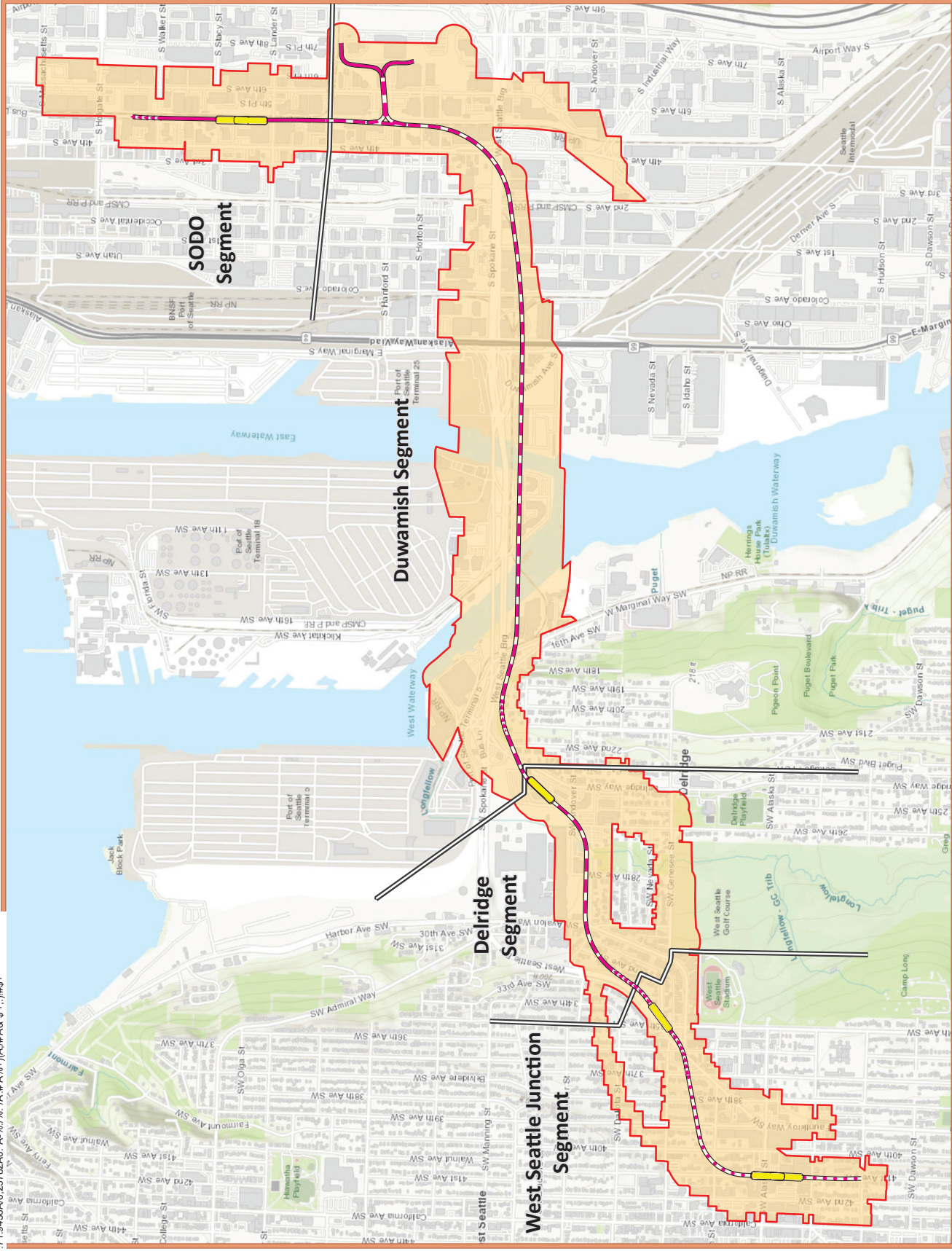
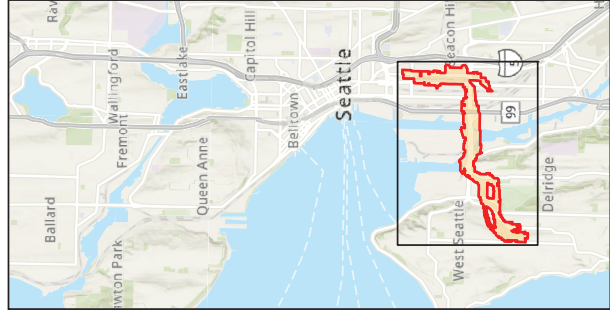
Date: 1/17/2025

Goran Sparrman (Chief Executive Officer)

Attachment A: Area of Potential Effects

Area of Potential Effects (APE) for
Sound Transit West Seattle Link
Extension
(July 2024)

- Station
- APE
- Segment Line
- Alternatives
 - Preferred Alternative
- Alternative Profile
 - Elevated
 - At-Grade
 - Tunnel
 - Retained Cut



Attachment B: NRHP Eligible and Adversely Affected Known Historic Properties

Segment	WISAARD Number	Property Name	Address	Date Built	Effect
SODO	342325	Lincoln Moving & Storage, Alaska Orient Van Lines Building	1924 4th Avenue South	1966	Not Adversely Affected
SODO	720609	Graybar Electric Company Building	1919 6th Avenue South	1960	Adversely Affected
SODO	720594	Platt Electric Supply Co.	2757 6th Avenue South	1970	Not Adversely Affected
SODO	342236	Holgate Terminals Incorporated	1762 6th Avenue South	1960	Not Adversely Affected
SODO	343198	Mill & Mine Supply Co. Building and Warehouse	625 South Lander Street	1953	Not Adversely Affected
SODO	721855	Northwest Wire Works	2752 6th Avenue South	1947	Not Adversely Affected
SODO	728870	Denny's	2742 4th Avenue South	1968	Not Adversely Affected
Duwamish	Multiple	Spokane Street Manufacturing Historic District	Multiple	1908-1968	Adversely Affected
Duwamish	342274	Seattle Pacific Sales Company Warehouse	3800 1st Avenue South	1968	Not Adversely Affected
Duwamish	45159	Link-Belt Company Property	3405 6th Avenue South	1946	Not Adversely Affected
Duwamish	718431	Viking Automatic Sprinkler Company	3434 1st Avenue South	1964	Not Adversely Affected
Duwamish	720509	Transportation Equipment Rentals Office Building	3443 1st Avenue South	1968	Not Adversely Affected
Duwamish	720510	Transportation Equipment Rentals Maintenance Warehouse	3443 1st Avenue South	1968	Not Adversely Affected
Duwamish	720511	Acme Tool Works	3626 East Marginal Way South	1941	Adversely Affected
Duwamish	721620, 721624, 721625, 721628, 721629	Pacific Forge Company/ Bethlehem Steel Nut and Bolt Factory Historic District	3800 West Marginal Way Southwest	1917 to 1968	Adversely Affected
Duwamish	45086	Fire Station 14	3224 4th Avenue South	1922	Not Adversely Affected
Duwamish	45085	Pacific Hoist and Warehouse Company	3200 4th Avenue South	1931	Not Adversely Affected
Duwamish	342730	Langendorf United Bakeries	2901 6th Avenue South	1952	Not Adversely Affected

Segment	WISAARD Number	Property Name	Address	Date Built	Effect
Duwamish	720593	Langendorf United Bakeries Repair Garage	2901 6th Avenue South	1955	Not Adversely Affected
Duwamish	38533	A.M. Castle and Company	3640-60 East Marginal Way South	1945	Adversely Affected
Duwamish	38532	Alaskan Copper Works/Eagle Brass Foundry Company	3600 East Marginal Way South	1918	Not Adversely Affected
Duwamish	342160	Pacific Reefer Fisheries	3480 West Marginal Way Southwest	1964	Not Adversely Affected
Duwamish	48502	Alaskan Copper and Brass Company	3223 6th Avenue South	1953	Not Adversely Affected
Duwamish	294616	Single-Family Residence	3842 23rd Avenue Southwest	1914	Not Adversely Affected
Duwamish	722008	NW Motor Parts Corporation Building	2930 6th Avenue South	1951	Not Adversely Affected
Duwamish	721857	M.J.B Coffee Company Warehouse	2940 6th Avenue South	1954	Not Adversely Affected
Duwamish	342997	Alaskan Copper Company Employment Office	2958 6th Avenue South	1941	Adversely Affected
Duwamish	721997	Auto Repair Garage	2958 6th Avenue South	1948	Adversely Affected
Duwamish	340010	Los Angeles-Seattle Motor Express Company	3200 6th Avenue South	1945	Not Adversely Affected
Duwamish	342709	Scientific Supplies Company	600 South Spokane Street	1954	Not Adversely Affected
Duwamish	86871	Department of Highways District No. 1 Headquarters/ Maintenance Facility – Office/ Administrative Building	450 South Spokane Street	1931	Not Adversely Affected
Duwamish	722096	Department of Highways District No. 1 Headquarters/ Maintenance Facility – Maintenance Building	450 South Spokane Street	1931	Not Adversely Affected
Duwamish	722098	Department of Highways District No. 1 Headquarters/ Maintenance Facility – Storage Building	450 South Spokane Street	1931	Not Adversely Affected

Segment	WISAARD Number	Property Name	Address	Date Built	Effect
Duwamish	722100	Department of Highways District No. 1 Headquarters/ Maintenance Facility – Car/Paint Building	450 South Spokane Street	1931	Not Adversely Affected
Duwamish	722101	Department of Highways District No. 1 Headquarters/ Maintenance Facility – Maintenance/Garage Building	450 South Spokane Street	1959	Not Adversely Affected
Duwamish	342259	Riches & Adams Co./Seattle Opportunities Industrialization Center, Inc.	3627 1st Avenue South	1954	Not Adversely Affected
Duwamish	344061	General Construction Company Office	3840 West Marginal Way Southwest	1931	Not Adversely Affected
Duwamish	725824	Air Mac, Inc.	3838 4th Avenue South	1953	Not Adversely Affected
Duwamish	725825	Warehouse and Office Building	3623 6th Avenue South	1961	Not Adversely Affected
Duwamish	45089	Seattle City Light South Receiving Substation	3839 4th Avenue South	1938	Not Adversely Affected
Duwamish	725921	Seattle City Light South Receiving Substation Switchyard	3839 4th Avenue South	1924	Not Adversely Affected
Duwamish	730783	Seattle City Light Warehouse and Office Building	3613 4th Avenue South	1965	Not Adversely Affected
Duwamish	730784	Seattle City Light South Rectifier Substation	3613 4th Avenue South	1952	Not Adversely Affected
Duwamish	44440	Northern Pacific Railway Bridge Over the West Waterway	South of Spokane Street, near Klickitat Way Southwest	1911	Not Adversely Affected
Duwamish	730874	Spokane Street East and West Towers, Harbor Island-Delridge-West Seattle 230-kilovolt Transmission Line	West Marginal Way Southwest and Spokane Street Southwest	1922	Not Adversely Affected
Duwamish	45KI52	Archaeological Site 45KI52	West of West Duwamish Waterway	n/a	Adversely Affected
Delridge	717063	West Seattle Golf Course	4600 35th Avenue Southwest	1936	Not Adversely Affected

Segment	WISAARD Number	Property Name	Address	Date Built	Effect
Delridge	344641	Bethlehem Pacific Coast Steel Company Office Building	4045 Delridge Way Southwest	1960	Not Adversely Affected
Delridge	721070	Residence	4030 Delridge Way Southwest	1906	Not Adversely Affected
Delridge	38466	Seattle Steel Company/ Bethlehem Pacific Coast Steel Corporation	2424 Southwest Andover Street	1966	Not Adversely Affected
Delridge	47869	Mrachke & Son	3860 – 3864 Delridge Way Southwest	1930	Not Adversely Affected
Delridge	376099	Single-Family Craftsman Residence	4108 25th Avenue Southwest	1907	Not Adversely Affected
Delridge	721178	Single-Family Residence	4139 25th Avenue Southwest	1909	Not Adversely Affected
Delridge	418305	Contemporary Ranch House	4150 32nd Avenue Southwest	1959	Not Adversely Affected
Delridge	335189	Kirlow Four-Plex	3074 Southwest Avalon Way	1967	Not Adversely Affected
Delridge	287692	Residence	4017 23rd Avenue Southwest	1907	Not Adversely Affected
Delridge	300990	Residence	4044 32nd Avenue Southwest	1925	Not Adversely Affected
Delridge	721984	Cettolin House	4022 32nd Avenue Southwest	1928	Adversely Affected
Delridge	730028	Single-Family Residence	4019 Fauntleroy Way Southwest	1931	Not Adversely Affected
Delridge	730040	Single-Family Residence	4032 35th Avenue Southwest	1932	Not Adversely Affected
West Seattle Junction	719318	Limcrest Apartments	3600 Southwest Genesee Street	1956	Not Adversely Affected
West Seattle Junction	720871	Carlsen & Winquist Auto	4480 Fauntleroy Way Southwest	1946	Not Adversely Affected
West Seattle Junction	720875	West Seattle Brake Service	4464 37th Avenue Southwest	1948	Not Adversely Affected
West Seattle Junction	720988	Jim's Shell Service	4457 Fauntleroy Way Southwest	1965	Not Adversely Affected

Segment	WISAARD Number	Property Name	Address	Date Built	Effect
West Seattle Junction	420560	Residence	4407 38th Avenue Southwest	1924	Not Adversely Affected
West Seattle Junction	721552	Campbell Building	4554 California Avenue Southwest	1918	Not Adversely Affected
West Seattle Junction	721486	Alaska House	4545 42nd Avenue Southwest	1979	Not Adversely Affected
West Seattle Junction	343799	Wardrobe Cleaners	4500 Fauntleroy Way Southwest	1949	Not Adversely Affected
West Seattle Junction	365276	Craftsman Bungalow	4015 Southwest Hudson Street	1906	Not Adversely Affected
West Seattle Junction	442141	Contemporary Ranch House	3221 Southwest Genesee Street	1959	Not Adversely Affected
West Seattle Junction	338613	Golden Tee Apartments	3201 Southwest Avalon Way	1967	Not Adversely Affected
West Seattle Junction	303008	Single-Family Residence	4157 38th Avenue Southwest	1956	Not Adversely Affected
West Seattle Junction	338612	Golden Tee Apartments	3211 Southwest Avalon Way	1967	Not Adversely Affected
West Seattle Junction	679043	Bartell Drugs	4548 California Avenue Southwest	1929	Not Adversely Affected
West Seattle Junction	334059	Chinook Apartments	4431 37th Avenue Southwest	1959	Not Adversely Affected
West Seattle Junction	365104	Residence	4446 40th Avenue Southwest	1908	Not Adversely Affected
West Seattle Junction	343495	West Seattle Bowl	4505 39th Avenue Southwest	1948	Not Adversely Affected
West Seattle Junction	343979	Venable and Wing Law Office	4826 California Avenue Southwest	1963	Not Adversely Affected
West Seattle Junction	721512	Residence	5011 41st Avenue Southwest	1925	Not Adversely Affected
West Seattle Junction	278849	Residence	4115 Southwest Hudson Street	1913	Not Adversely Affected
West Seattle Junction	654505	Residence	4426 38th Avenue Southwest	1932	Not Adversely Affected

Segment	WISAARD Number	Property Name	Address	Date Built	Effect
West Seattle Junction	721838	J.C. Penney/Russell Building	4520 California Avenue Southwest	1926	Not Adversely Affected
West Seattle Junction	721839	Marier Foto Studio	4528 California Avenue Southwest	1928	Not Adversely Affected
West Seattle Junction	722760	Single-Family Residence	4714 38th Avenue Southwest	1939	Not Adversely Affected
West Seattle Junction	722762	Single-Family Residence	4755 38th Avenue Southwest	1957	Not Adversely Affected
West Seattle Junction	723076	Apartment Complex	4821 Fauntleroy Way Southwest	1957	Not Adversely Affected
West Seattle Junction	723077	Apartment Complex	4821 Fauntleroy Way Southwest	1957	Not Adversely Affected
West Seattle Junction	729979	Single Family Residence	4039 36th Avenue Southwest	1953	Not Adversely Affected
West Seattle Junction	729980	Single Family Residence	4045 36th Avenue Southwest	1948	Not Adversely Affected
West Seattle Junction	730016	Single Family Residence	4109 38th Avenue Southwest	1919	Not Adversely Affected
West Seattle Junction	730017	Single Family Residence	4111 38th Avenue Southwest	1919	Not Adversely Affected
Multiple	708606	Seattle and Walla Walla Railroad/Puget Sound Shore Railroad Company/Seattle, Lake Shore and Eastern Railroad/Northern Pacific Railway Black River Junction to the Lake Washington Ship Canal	Railroad Right of Way from Black River Junction near Renton to Lake Washington Ship Canal in Interbay	1883	Not Adversely Affected

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Susan Fletcher

susan.fletcher@dot.gov

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Signature

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Susan Fletcher
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Goran Sparrman

Goran.Sparrman@soundtransit.org

Interim CEO

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Goran Sparrman
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Sarah Sodt

Sarah.Sodt@seattle.gov

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Sarah Sodt
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Electronic Record and Signature Disclosure:

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Dr Allyson Brooks

Allyson.Brooks@dahp.wa.gov

Executive Director

DAHPP

Security Level: Email, Account Authentication
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Signed by:

Dr Allyson Brooks
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Signature Adoption: Pre-selected Style

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Kendra Martinez kmartinez@suquamish.nsn.us Security Level: Email, Account Authentication (None) Electronic Record and Signature Disclosure: Not Offered via DocuSign		

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