
Section 5.0: Organization Comments and Responses



July 28, 2014

Sound Transit
Attention: Karin Ertl, Long-Range Plan Draft SEIS
Union Station, 401 S. Jackson Street
Seattle, WA 98104

Dear Ms. Ertl:

On behalf of the Bellevue Downtown Association (BDA), I want to thank you for the opportunity to provide these comments on the Draft SEIS for the Regional Transit Long-Range Plan Update.

The Bellevue Downtown Association (BDA) has supported extending and improving the region's transit system to serve recent and planned growth with strong multi-modal connections to Downtown Bellevue, King County's second largest job center and the Eastside's fastest growing city core. Downtown Bellevue is a high priority market to serve in both Sound Move and Sound Transit 2. Under current voter-approved plans and through agreement with the City of Bellevue, East Link will deliver light rail service to downtown in 2023.

In reviewing the existing plan alternative and potential modifications, we note the region will benefit from cost-effectively leveraging current investments and strengthening transit connectivity in key corridors between major job centers on the Eastside. The success of these connections will greatly influence our capacity to fulfill land use visions, grow and prosper as a regional center.

The travel demand forecast per the City of Bellevue's recent Downtown Transportation Plan Update predicts significant growth in total daily trips by 2030, from 385,000 to 665,000. Land use forecasts for downtown call for 70,000 jobs and 19,000 residents by 2030, and current economic activity in Downtown Bellevue alone generates an estimated \$2 billion in annual taxable retail sales.

482-1 Sound Transit's long range plans should also support efficiencies and improve service capacity with other regional public (i.e. King County Metro) and private (i.e. Microsoft Connector) providers. We also ask the agency to incorporate recent updates to the Bellevue Transit Master Plan and Bellevue's emerging and adopted transportation plans.

On the related topic of transit planning, Sound Transit's Operations and Maintenance Satellite Facility (OMSF) siting process to date has shaken community confidence in the agency's approach to regional and local land use policies. This issue, if mishandled going forward, could play a part in limiting public support for Sound Transit's future plans.

Finally, I would like to reiterate the BDA does not yet endorse a specific set of alternatives or funding approach for future regional transit expansion. Once again thank you for considering this feedback, and we will continue our work with you to solve transportation challenges and improve mobility in the region.

Sincerely,

Patrick Bannon, President

Making A Great Place Together

400 108th Avenue NE, Suite 110 • Bellevue, WA 98004 • 425-453-1223 • Fax 425-646-6634 • www.bellevuedowntown.com

482-1

Appendix F of the Final SEIS has been revised to incorporate recent updates to the Bellevue Transit Master Plan and Bellevue's adopted transportation plans.



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Gary D. Huff
 Attorney at Law
 701 Fifth Avenue, Suite 3300
 Seattle, Washington 98104
 Direct: (206) 224 8024
 Main: (206) 223 1313
 Fax: (206) 682 7100
 ghuff@karrtuttle.com

July 28, 2014

Sound Transit
 Attn: Karin Ertl
 401 S. Jackson St.
 Seattle, WA 98104

RE: Sound Transit Long Range Plan Update—Comments re DEIS
 Request for Inclusion of Sounder Rail Station at Point Wells

Dear Sound Transit:

This letter is submitted on behalf of BSRE Point Wells, LP ("BSRE") and contains comments regarding the Sound Transit Long Range Update Draft Supplemental EIS.

BSRE is the proponent of and applicant for development approvals for a 3,081 unit mixed-use urban center development on 60+ acres at Point Wells which located just north of the King-Snohomish County line in unincorporated Snohomish County. The Sounder commuter line bisects the site, offering what we believe to be an ideal opportunity to both increase ridership on the Sound Transit north line while enabling the residents at Point Wells to efficiently commute to and from Seattle and beyond. Photos of the model of the proposed urban center development are included for your reference, as are other documents which reflect the planned incorporation of a Sounder station into project plans.

The proposed Point Wells Urban Center with a Sounder rail stop is consistent with and reinforces each of Sound Transit's five primary goals and objectives for the Long-Range Plan:

- Provide an HCT system that ensures long-term mobility
- Preserve and promote healthy and sustainable environment
- Strengthen community use of the regional transit network
- Improve economic vitality of the region
- Create financial feasible system

The Point Wells urban center proposal includes plans for the construction of a Sounder stop at the heart of the development. We note that a stop in the general area of nearby Richmond Beach has long been included in Sound Transit's long range plans. We also recognize that this site has not been included in prior funding packages. This omission is not at all surprising given

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A Sounder station in the general vicinity of Shoreline/Richmond Beach is included in Appendix A of the Final SEIS as a "representative project" under the Current Plan Alternative (see Table A-6 in the Final SEIS). These are projects that could be implemented along the corridors that comprise the Current Plan Alternative regardless of whether service is already in operation along those corridors. The list represents the types of projects or support facilities that could be implemented along a corridor if funding is identified. The City of Edmonds and other stakeholders would have additional opportunities to comment on potential station locations as projects are implemented in the future.

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that there has been insufficient rider demand near the site to warrant service. This lack of demand will, however, significantly change with the development of Point Wells. At buildout, Point Wells is expected to house a population in excess of 6,000 people and will include significant and publicly accessible retail, commercial, community and recreational facilities.

Although the project has faced numerous legal challenges, any doubts regarding the project's viability were largely removed when the State Supreme Court ruled earlier in favor of the project. The project team is nearing the successful conclusion of negotiations with the City of Shoreline regarding the mitigation of traffic impacts. Snohomish County is fully engaged in preparing a draft environmental impact statement for the project which should adopt and incorporate the conclusions and mitigation conditions set forth in the Shoreline agreement.

We realize it will take a number of years to complete the necessary permitting process and to then remediate the site and construct sufficient housing to justify a Sounder stop. The current update to Sound Transit's long range service plan is the logical and appropriate time to clearly depict a potential future stop at this site. The inclusion of such a potential stop will also be of great assistance in rebutting the contention that no station will ever be allowed at this location.

We are fully aware that the demand on Sound Transit's limited resources far outweighs available funding. We further recognize the appropriate prioritization of the extension of light rail service to new areas. However, we do not see a Sounder rail station at Point Wells as competing with those funding priorities. To be clear, we are *not* asking that Point Wells be included in the ST 3 funding package. We ask only that this **site be addressed in the ST 3 Final EIS and eventually included in your long range service plan**. We recognize that the construction of the Sounder rail station would be contingent upon the execution of a binding agreement by which **BSRE would commit to fund the construction of this station**.

Our views as described herein are consistent with the direction provided us following prior conversations regarding this possibility. The attached letter dated April 13, 2010 from David Phillip Beal, Sound Transit's Planning and Project Development Manager, includes the following relevant passages:

"First, it is part of Sound Transit's mission to provide service to Urban Centers. Point Wells' location on the Everett-to-Seattle Sounder line and the property's Urban Center designation lend support to [BSRE's] concept of including a commuter rail station within your development . . .

I also want to note that a 'provisional' station located in the Point Wells/Richmond Beach area was part of Sound Transit's original Ten Year Regional Transit System Plan, known as *Sound Move*, with 'provisional' defined as '*subject to funding availability from the North King County subarea . . .*' Because funding did not become available a station was never constructed in this area.

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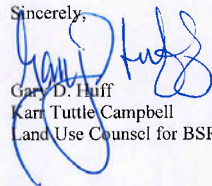
July 28, 2014

Page 3

Should [BSRE] propose to fund the commuter rail station without Sound Transit funding, this could clearly influence the review and timing of the development of a station at Point Wells."

We believe this development proposal and inclusion of a Sounder rail station at Point Wells represents a true win/win scenario. To help make this proposal a reality, we request that the possible development of a station at Point Wells be addressed in your final EIS. We are confident that the FEIS discussion will underscore the validity of our representations and the extraordinary value of this rare opportunity. We further believe that the express inclusion of such a station in your long range plan, even if the station is again designated as provisional, would meet both your planning and service priorities while fulfilling the goals of the Growth Management Act to place dense housing in locations served (or to be served) by high occupancy transportation operations.

Sincerely,



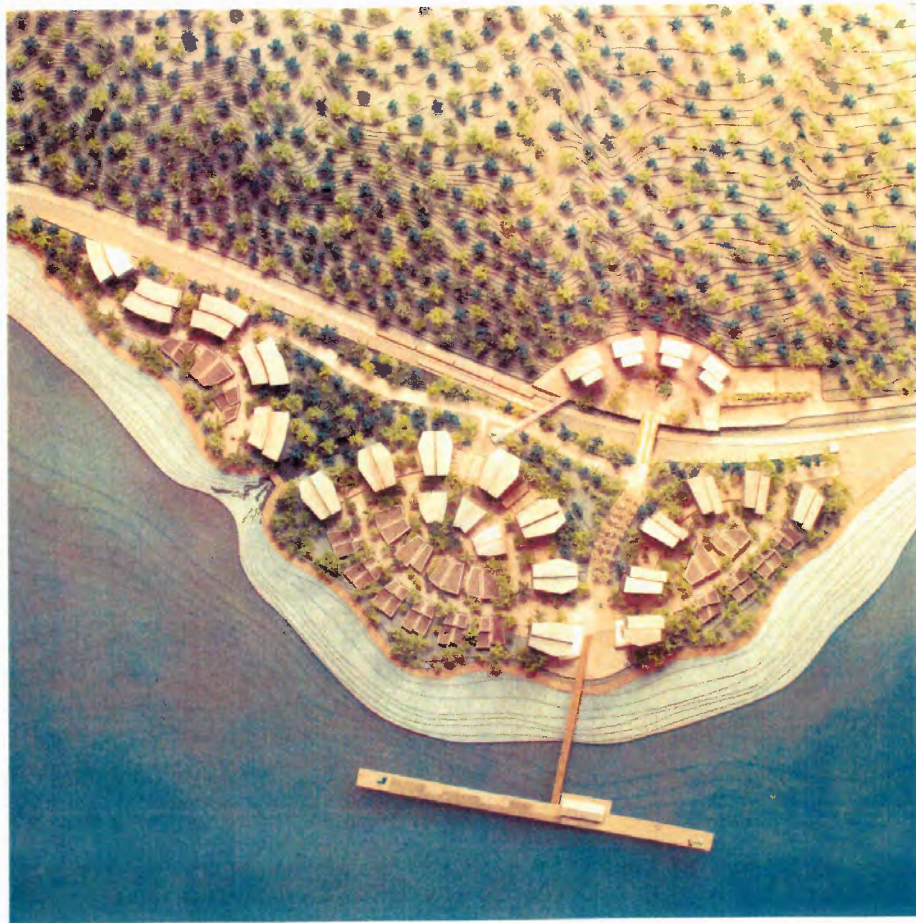
Gary D. Huff
Kari Tuttle Campbell
Land Use Counsel for BSRE Point Wells, LP

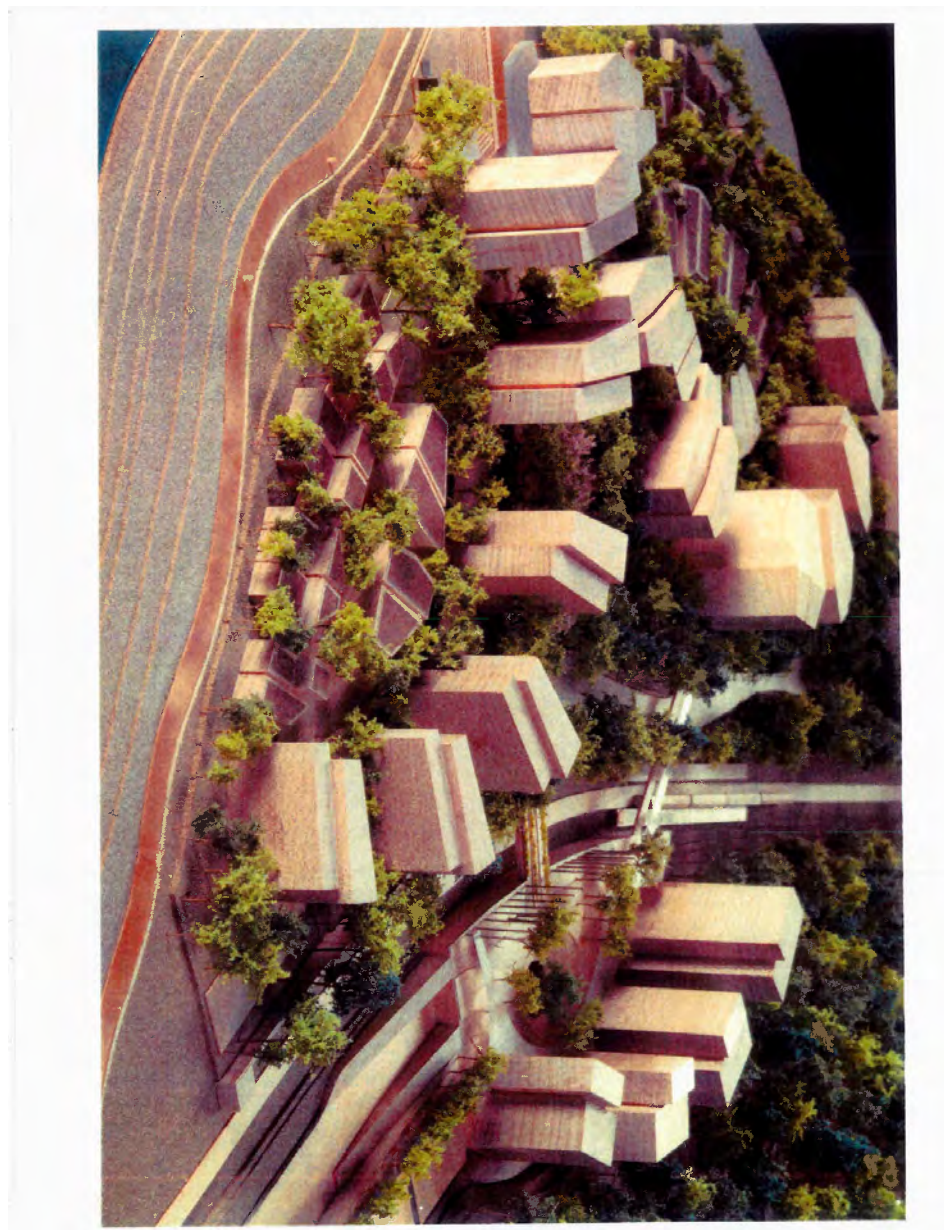
cc: Sound Transit Board of Directors
BSRE Point Wells, LP
Steven D. Farkas, Counsel for BSRE Point Wells, LP
Douglas A. Luetjen, Counsel for BSRE Point Wells, LP
Steve Ohlenkamp, The Communication Group
Ken Johnsen
Brad Tong

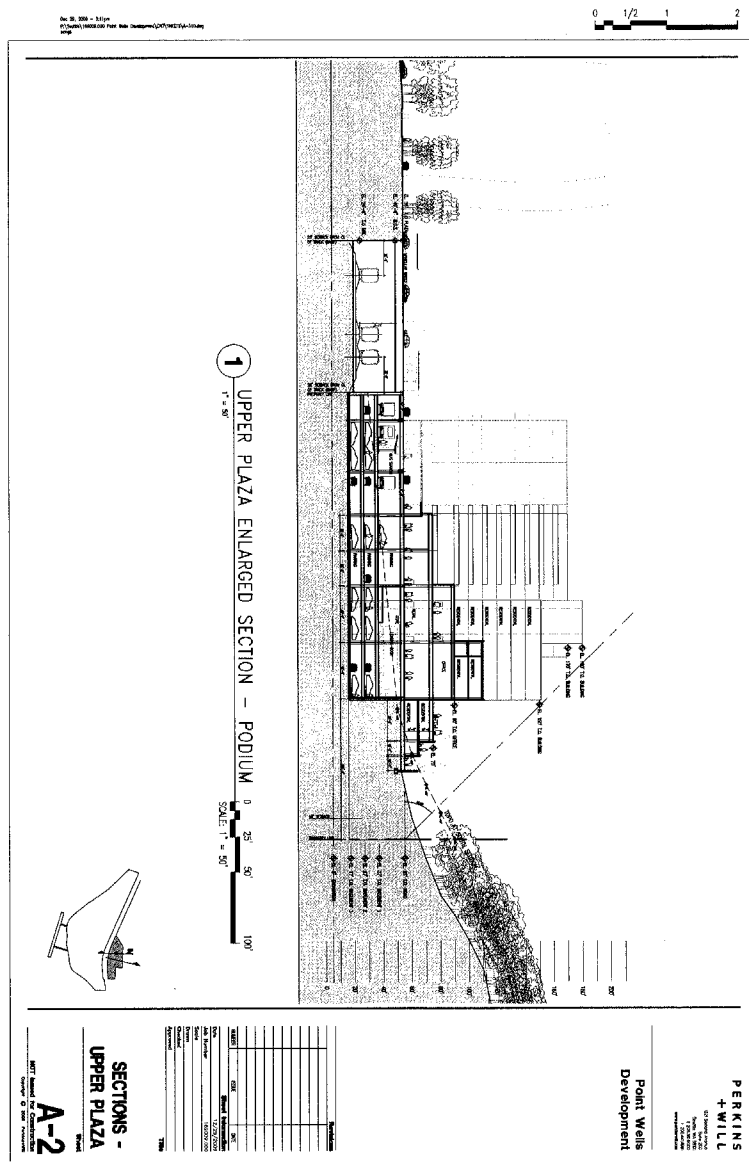
Enclosures

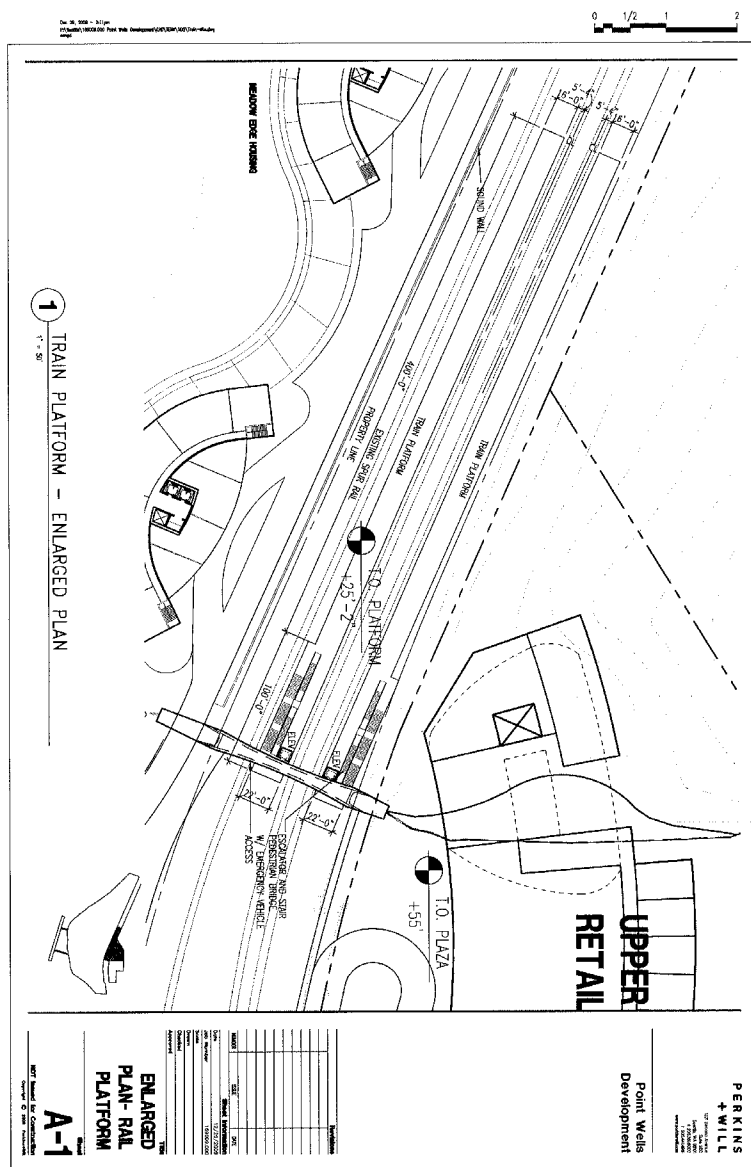
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04/14/2010 WED 11:59 FAX 2069037499 Sound Transit

0002



April 13, 2010

Mark Wells
Paramount Petroleum Corp.
20555 Richmond Beach Drive NW
Seattle, WA 98177

Re: Point Wells/Richmond Beach Sound Transit Service Opportunity

Dear Mark:

This letter responds to your February 9, 2010 letter regarding Paramount's Point Wells development project. Sound Transit recognizes there are many issues being considered by Snohomish County and other jurisdictions regarding Paramount's proposed development. Most of these are outside Sound Transit's purview. That said, given Snohomish County Council's unanimous approval of an Urban Center designation for Paramount's property, it is appropriate for Sound Transit to respond to your general questions regarding the potential for Sounder commuter rail service at this location. Rather than respond to your six individual questions, I'll provide a general response to your letter.

First, it is part of Sound Transit's mission to provide service to Urban Centers. Point Wells' location on the Everett-to-Seattle Sounder line and the property's "Urban Center" designation lend support to Paramount's concept of including a commuter rail station within your development. Such a station has the potential to increase ridership on the Everett-to-Seattle line. While your property may have adequate room to integrate a station into a multi-modal transit center, there are other issues and constraints that would affect our ability to provide commuter rail service in that location. At our meeting with you in December 2009 we provided you information regarding Sound Transit's design guidelines for rail stations. It would be critical for us to work with the adjoining jurisdictions prior to determining the feasibility of such a station and service in the future, and with the BNSF Railway to establish the Sounder Everett-to-Seattle line's capacity to accommodate an additional station. It is important to note that BNSF would also need to approve the design and location of any new station and platforms.

I also want to note that a "provisional" station located in the Point Wells/Richmond Beach area was part of Sound Transit's original Ten Year Regional Transit System Plan, known as *Sound Move*, with "provisional" defined as "...subject to funding availability from the North King County

Central Puget Sound Regional Transit Authority • Union Station
401 S. Jackson St. • Seattle, WA 98104-2826 • Reception: (206) 398-5000 • FAX: (206) 398-5499 • www.soundstransit.org

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CHIEF EXECUTIVE OFFICER
Joni Earl



subarea" (page 17). Because funding did not become available a station was never constructed in this area.

Despite the potential Point Wells might hold for a commuter rail station, it is important to note that Sound Transit's ST2 plan, approved by the voters in 2008, provides funding for a specific set of capital projects through 2023. It is unlikely that the Sound Transit Board would vote to fund or partially fund any additional projects prior to the second-half of the 15 year plan (2016 or later). Furthermore, any new project would have to be evaluated vis-à-vis other potential additional Sound Transit projects. Since Point Wells falls immediately north of the Richmond Beach provisional station identified in *Sound Move*, a Point Wells station would be located in the Sound Transit Snohomish County subarea. Any Sound Transit costs related to Point Wells would be evaluated against the Board's priorities for that subarea. Should Paramount propose to fund the commuter rail station without Sound Transit funding, this could clearly influence the review and the timing of the development of a station at Point Wells.

I hope this letter is helpful as you continue your work. We look forward to coordinating with Paramount Petroleum as you develop your Point Wells property. Feel free to call me if you have any additional questions.

Sincerely,



David Phillip Beal
Planning & Project Development Manager
Department of Planning, Environmental & Project Development
Sound Transit



950 Pacific Ave, Suite 300 | Tacoma, WA 98402
253-682-1739 | dotg@tacomachamber.org

July 22, 2014

Sound Transit
Attn: Karin Ertl
401 S. Jackson St.
Seattle, WA 98104

Dear Ms. Ertl,

On behalf of our Board of Directors, who represent twenty downtown businesses, organizations, and agencies, and the approximately 30,000 employees and more than 5,000 students that commute to downtown Tacoma on a daily basis, thank you for the opportunity to comment on the Sound Transit Long-Range Plan. Our goal is to reduce the downtown drive-alone rate by 11 percent by 2015. Working together with our partners and agencies like Sound Transit, we know we can make this goal a reality.

As our county's economic hub and urban growth center, downtown Tacoma expects significant growth in the next 20 years. Providing reliable High Capacity Transit (HCT) to and from downtown Tacoma with connections to local bus service and other transportation options will ensure this growth does not produce more congestion or have negative effects on our economy or quality of life. We would like to see the Sound Transit Long-Range Plan maintain its focus on connecting regional centers, including downtown Tacoma, to encourage growth in urban areas rather than furthering sprawl.

To this end, Downtown On the Go supports a light rail expansion from the SeaTac International Airport to downtown Tacoma. We would also like to see increased capacity and frequency in the existing network of Sound Transit Express Buses and Sounder Commuter Rail to and from various regional destinations, as we continue to see demand grow for these services.

In addition, we are looking forward to the current Tacoma Link Expansion Project becoming a reality and we encourage you to include future expansion projects in the Long-Range Plan. This service has great potential to increase the number of downtown commuters leaving their cars at home and, as part of our city's integrated transportation network, will help us realize our vision of a thriving, vibrant downtown.

Finally, we would like to see mention in the Long-Range Plan of connecting Sound Transit services to local Pierce Transit service and the City of Tacoma's Mobility Master Plan (bicycle and pedestrian networks), including station access for all modes, to fully realize the complete transportation system.

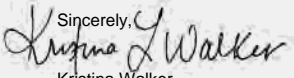
Downtown On the Go is a partnership between the Tacoma-Pierce County Chamber, City of Tacoma and Pierce Transit.

368-1

The Long-Range Plan would support bus feeder services and multi-modal connections, as indicated in the list of representative projects for the Current Plan Alternative (e.g., "Improve feeder services," "Improve connections between HCT and regional centers," and "Improve non-motorized access to stations"). For projects that are implemented as part of a future system plan, more detailed project specific analysis will occur in the future. As part of project development, Sound Transit will facilitate access to high-capacity transit services on its properties and work cooperatively with local jurisdictions and bus transit operators to promote access from surrounding communities.

368-1

Thank you again for the opportunity to comment. We look forward to working with you on future transit connections for Tacoma and the region.

Sincerely,

Kristina Walker
Downtown On the Go Manager

Eastside Transportation Association

"Dedicated to improving our quality of life and environment by reducing congestion through increased mobility"
P.O. Box 50621
Bellevue, WA 98015

July 28, 2014

Sound Transit
Attention: Karin Ertl, Long-Range Plan Draft SEIS Union Station
401 S. Jackson Street
Seattle, WA 98104

Emailed to: LongRangePlan@soundtransit.org

Dear Karin Ertl,

Thank you for the opportunity to comment on the Draft SEIS. Listed below are examples of the kind of information we would like to see in evaluating your long-range plan. We realize that the draft SEIS is not at the project level, but it provides too little for a meaningful evaluation.

1. What is the contribution of Sound Transit's Potential Plan Modifications Alternative to Regional travel needs. What portion of regional person-trips would be served by Sound Transit's person-trips? Much of the information in the draft SEIS combines results for all the regional transit agencies (see Table 3-7 for example). This obscures consideration of Sound Transit's plan results.
2. What are the order-of-magnitude capital and operating costs for the Potential Plan Modifications Alternative? What are the costs per ride for Sound Transit elements?
3. In a document lacking important details, why is some information shown with implied precision? For example, "With the Current Plan Alternative, there would be approximately 99.0 million VMT per day by 2040. With the Potential Plan Modifications Alternative, there would be approximately 98.4 million VMT per day." (p. 3-55). The word "approximately" suggests that the 6/10ths of one percent difference may be insignificant. A more appropriate statement would be "With the Potential Plan Modifications Alternative, there would be no change in VMT."

Sincerely,

Eastside Transportation Association



William R. Eager, Chair

492-1

Total person-trips are not reported as the structure of the Sound Transit ridership forecasting model only allows for estimation of transit person-trips, not total person-trips in the region.

The modeling analysis in the Final SEIS has been revised to break out transit ridership information for Sound Transit rail and bus services from ridership information for local bus systems. Between the Current Plan Alternative and ST2, ridership increases would occur for Sound Transit service, but ridership on local bus service would decline to a lesser degree. The same pattern is estimated to occur between the Potential Plan Modifications Alternative and the Current Plan Alternative. The information is presented in Section 3.4.1 of the Final SEIS and Section 4.1.2 of the Transportation Technical Report (Appendix K) of the Final SEIS.

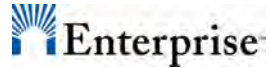
492-2

Please see the response to common comment 23 - Level of detail in the SEIS in Section 5.3.5 of Chapter 5 of this Final SEIS.

492-3

In the Draft SEIS, the word "approximately" reflected the rounding applied to the model-estimated 99.0339 million VMT for the Current Plan Alternative and the 98.3610 million VMT for the Potential Plan Modifications Alternative. In the Final SEIS, the word "approximately" reflects the rounding applied to the model-estimated 99.0339 million VMT for the Current Plan Alternative and the 98.2649 million VMT for the Potential Plan Modifications Alternative.

Submission # 495



July 25, 2014

Sound Transit
ATTN: Karin Ertl
401 S. Jackson
Seattle, WA 98104

RE: Recommendations on the long range plan alternatives

Ms. Ertl:

Enterprise Community Partners works with private sector and non-profit developers to develop residential and mixed use projects that are affordable, sustainable and connected to opportunity. We invest debt and equity in a variety of projects but also provide technical assistance to developers and policy feedback to communities based on our experience in these transactions.

In reviewing the Draft Supplemental Environmental Impact Statement, we noted certain studied alternatives that would add to the quality of the high capacity transit system and greatly benefit the community. These include alternatives that:

Increase transit capacity to low income populations:

- Alternative #36 providing Auburn with a link to the high capacity transit system
- Alternative #2 extending the light rail system to Burien

Link job centers into the high capacity transit network:

- Alternatives #2 and #25 that extend high capacity infrastructure to the Duwamish Industrial area
- Alternatives #34 linking low income populations in south county to service job clusters in Bellevue
- Alternative #35 connecting Kent to the Sea-Tac job base
- Alternative #1 increasing the capacity to service and light industrial jobs in Ballard
- Alternative #15 connecting either the current route or alternative #4 to the Southwest Everett Industrial Center

Finally, alternative #4 to Everett would offer dramatically increased non-motorized access to the stations along that extension when compared to the proposed route that follows the I-5 ROW. If alternative #1 emerges as a priority alignment that moves forward, the route to Everett should be shifted to the route depicted in alternative #4 to maximize development opportunity and thus ridership.

Sincerely,

Devin Culbertson
Program Director
Transit Oriented Development

ENTERPRISE
2025 First Avenue ■ Suite 1250 ■ Seattle, WA 98121 ■ www.enterprisecommunity.org ■ www.enterprisecommunity.com

Submission # 471



July 29, 2014

Sound Transit
Attn: Karin Ertl
401 S. Jackson St.
Seattle, WA 98104

Dear Ms. Ertl,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for Sound Transit's Long-Range Plan. The Seattle Metropolitan Chamber of Commerce strongly believes that the array of transit services provided by Sound Transit plays an integral role in our region's long-term economic vitality and livability.

We appreciate that the Potential Plan Modification Alternative provides additional options for future connections between key points throughout the ST service area. As the Sound Transit Board reviews these options and finalizes the Long Range Plan, we reiterate the importance of a Plan that:

- Connects regional growth centers to improve mobility in these areas where residents and jobs are concentrated, and takes job and population growth projections into account
- Complements, in as integrated a manner as possible, city, regional, and state investments in our region's transportation system
- Emphasizes completion of high-capacity transit corridors identified in earlier rounds of planning that continue to demonstrate a need for investment
- Assesses transit-oriented development early in system planning, in order to promote transit ridership and leverage transit investments for economic and community benefits

A strong transportation system strengthens our region's ability to compete with its global peers, and the Chamber and its members highly value the benefits a robust transit network brings to our region's long-term competitiveness. We have supported Sound Transit since its inception and look forward to continued involvement in the next phase of the agency's investments in our region.

Sincerely,

Maud Daudon
President & CEO

seattle metropolitan chamber of commerce
1301 Fifth Avenue, Suite 1500, Seattle, WA 98101 | p: (206) 389-7200 | f: (888) 392-7295 | seattlechamber.com

Seattle Subway's Comments on the Sound Transit Long Range Plan Update Draft Supplemental EIS

In response to Sound Transit's Long Range Plan Update Draft Supplemental Environmental Impact Statement ("DSEIS"), the following are Seattle Subway's comments for the public comment period that ends on Monday, July 28, 2014.

Sound Transit ("ST") last updated this document in 2005, four years prior to Central Link opening, and it shows. Sound Transit must review decisions that were made in its early days and are still affecting its direction now, even though Seattle and the region have changed a lot in the 15 years since Sound Transit's inception.

Improve Sound Transit's Long Range Plan to be more inline with the stated Goals and Objectives for Sound Transit's Long Range Plan:

Our comments will first call out conflicts between the goals of the LRP and its content. In this section, we will frame our comments in the context of Sound Transit's DSEIS's [Goals and Objectives for Sound Transit's Long-Range Plan \(page 1-5\)](#) (included here, see Appendix A). Seattle Subway believes these goals and objectives to be excellent.

In section 1, the upper left hand corner of the Goals and Objectives matrix it states:

Provide a public high-capacity transportation system that helps ensure long-term mobility, connectivity, and convenience for residents of the central Puget Sound region for generations to come

- Increase the percentage of people using transit for all trips
- Provide effective and efficient alternatives to travel on congested roadways

Grade separation provides the most efficient and effective way to move people. It eliminates interference from other traffic and maximizes transit's speed. Grade separation is a true alternative to congested roadways. The higher speed and frequency that a grade separated system enables creates the greatest increase in ridership as well. This, combined with the fact that nearly all of the 55 miles of lines Sound Transit is currently building are grade separated, make the following section of the LRP DSEIS out of place:

Chapter 2, Section 6.1 of the DSEIS, Alternative Technologies: The reason for exclusion of both Heavy Rail and Sky Train is listed as "Requires grade separation" ([page 2-32](#)).

Requiring grade separation leads us to the highest quality system and matches the goals of the Long-Range Plan. Different technologies make more sense for new lines in Seattle and the region. We need subway-grade speed and stop spacing to fully realize these goals.

As an additional justification for not studying new technologies, the DSEIS states, "Adding new technologies that are not part of Sound Transit's current operations would require separate new operations and maintenance facilities" ([page 2-32](#)). This justification is either out of date or

394-1

Please see the response to common comment 20 - Driverless technology in section 5.3.4 of Chapter 5 of this Final SEIS.

Please see the response to common comment 21 - Alternative technologies - General in Section 5.3.4 of Chapter 5 of this Final SEIS.

394-1

394-1

disingenuous. New lines in Seattle will require new O&M facilities regardless of which technology is used. When weighed against the advantages of driverless and grade separated rail (such as Sky Train) – the minor economies of scale achieved by using the same train sets across lines are not meaningful.

In section 5, the lower right hand corner of the Goals and Objectives matrix, it states:

Create a financially feasible system

- Improve Financial Sustainability

While it's true that the cost per ride on Link is trending down and will likely continue on that trajectory as it builds out and attracts more riders, it is not true that Sound Transit is considering everything it can that could improve financial sustainability. Vancouver, for example, is able to operate Sky Train at a cost that is less than Link's fare per boarding. It operates without taxpayer subsidy and even helps subsidize some bus operations. They achieve this by using driverless trains. Funding transit operations is a big and recurring political issue in our region; driverless trains can put a permanent end to that fight while saving the region a lot of money. Sound Transit must study implementing driverless trains in Seattle and the region on the new lines it builds.

Necessary additions and improvements to Sound Transit's Long Range Plan:

Our comments here will discuss in detail the additions and improvements to the Long Range Plan that must be made. In this section, we will discuss in detail the following improvements and additions to the LRP, detailed comments will be in numbered sections according to the list below:

1. **Study a Central Seattle Crosstown Corridor, generally from Interbay to Seattle's Central District.**
2. **Study a Madison Street Corridor, generally from a new subway station in downtown Seattle located on Madison west of Interstate 5, running east.**
3. **Review and update the population model being used in the studies. The PSRC numbers are clearly inaccurate in their 2035 projections.**
4. **Study the Sand Point Crossing — it's a better routing and the Trans-Lake Washington crossing study does not exclude this area from being studied.**
5. **Study the highest quality option for Ballard to UW.**
6. **Study a better Eastside corridor.**
7. **Present an option to the board for West Seattle that is easier to include in ST3.**

394-2

1. Study a Central Seattle Crosstown Corridor, generally from Interbay to Seattle's Central District.

Sound Transit should add a new Long Range Plan corridor from Seattle's Interbay or Magnolia neighborhood village to Seattle's Central District, serving the eternally congested Denny Way. This corridor would begin either as a subway under Magnolia Village or at an elevated station at the growing Dravus Village of Interbay. It should proceed elevated, south along 15th Avenue West and continue along Elliot Ave West, become a Subway under Denny Way. From Elliot Ave and Denny Way it would travel east with stations in Uptown/Belltown, South Lake Union, and Broadway on Capitol Hill. Then the corridor should run east to a station near Group Health at 15th and Thomas and connect with a Madison Corridor at 23rd and Madison Street.

2. Study a Madison Street Corridor, generally from a new subway station in downtown Seattle located on Madison west of Interstate 5, running east.

Sound Transit should add a new Long Range Plan corridor serving Madison Street, beginning in Downtown Seattle and continuing east along the very congested Madison Street Corridor. This corridor would begin at a new Downtown Seattle Subway Tunnel—in addition to the tunnel already located downtown. It should proceed east, underground along Madison Street. From downtown, travelling east it should connect to stations in First Hill and Capitol Hill. Then the corridor should run east to a station at 23rd and Madison Street and it should be designed to extend further east along Madison St or Union Street in the future to Madison Park or Madrona.

394-3

3. Review and update the population model being used in the studies. The PSRC numbers are clearly inaccurate in their 2035 projections.

The population projections in the [Ballard to Downtown Seattle Transit Expansion Study \(table 3-4\)](#) are very low and the methodology Sound Transit uses to create these projections should be updated. In the past the media has criticized ST for projections that seemed overly optimistic, but then proved valid post-recession. Sound Transit should avoid over-correcting by using excessively conservative estimates now. Beyond helping to decide which routes to build, the estimates will communicate a potential project's value to stakeholders and make a case for funding to the federal government.

We were shocked to see that ST was using 29,580 for Ballard's 2010 population, with expected growth by 2035 of 14% for a total of 33,820. We asked Sound Transit to explain why both numbers were so low. Their explanation was based on an area defined by the [Ballard Existing Conditions Report](#):

The Ballard to Downtown Seattle Transit Expansion Study used a definition of Ballard which covers the area from 8th NW to 32nd NW, the Ship Canal to NW 85th. This includes all of census tracts 30, 32 and 47 and approximately 80% of census tracts 31 and 32 (which extend west to Shilshole Bay). The total population of the five complete census tracts in the 2010 census was 32,502; the 29,580 number reflects the reduction of the western portions of census tracts 31 and 32.

394-2

The Potential Plan Modifications Alternative (see Figure 2-9 in the Final SEIS) includes high-capacity transit corridor 25 - West Seattle to Ballard via Central District, Queen Anne which could provide a connection from Interbay to Seattle's Central District. All of the corridors studied in the Final SEIS are intended to reflect a general area within which high-capacity transit could be implemented. The current Long-Range Plan explicitly states that "the lines on the map representing future service investments are intended to show general corridors that would be served, and do not represent specific routings or alignments."

Specific alignments will not be identified in the updated Long-Range Plan. For those corridors that are ultimately funded and implemented, more detailed project-level reviews will occur in the future including a more in-depth alternatives analysis that evaluates various alignment options. At that time, the public will have additional opportunities to review and comment on those alignment options.

394-3

Please see the response to common comment 15 - Use updated population and employment projections in section 5.3.4 of Chapter 5 of this Final SEIS.

394-3

The area covered is where all the growth in Ballard has occurred in the past and is occurring now. Additionally, nearly all of the larger development since 2010 has been apartments; there are currently only two condominium buildings under construction. This makes the comparison pretty easy. We asked the apartment market experts at Dupre & Scott if they had numbers for Ballard since 2010. For this example, to be conservative we assumed anything built 2009 or before was 100% absorbed and anything built in 2010 was 50% absorbed when the census was taken at the end of that year. We will also assume apartment occupancy of 1.8 people per rental unit and 2.3 people per sold unit per the [census numbers for Seattle](#).

Here is what Dupre & Scott sent us:

DUPRE & SCOTT The Apartment Development Report
custom online report

CUSTOM REPORT CRITERIA USED:
Market area: Ballard

DEVELOPMENT HISTORY								
Year	New units	New % stock	Conversions	Demol	Subsid	Reconvert	Net Change	Total units
1996	1,023	-	25	0	0	0	-	1,023
1996	0	0%	0	0	0	0	0	1,023
1997	0	0%	0	0	0	0	0	1,023
1998	0	0%	0	0	0	0	0	1,023
1999	0	0%	0	0	0	0	0	1,023
2000	0	0%	0	0	0	0	0	1,023
2001	0	0%	0	0	0	0	0	1,023
2002	0	0%	0	0	25	0	-25	998
2003	0	0%	0	0	0	0	0	998
2004	0	0%	0	0	0	0	0	998
2005	0	0%	0	0	0	0	0	998
2006	0	0%	42	0	0	0	42	956
2007	0	0%	0	0	0	0	0	956
2008	62	6.49%	0	0	0	0	62	1,018
2009	260	25.14%	0	0	0	0	260	1,278
2010	268	17.18%	0	0	0	0	268	1,546
2011	0	0%	0	0	0	0	0	1,546
2012	0	0%	0	0	25	25	0	1,571
2013	586	27.17%	0	0	0	0	586	2,157
2014	615	27.19%	0	0	0	0	615	2,772
2015	539	16.28%	0	0	0	0	539	3,311
2016	260	7.28%	0	0	0	0	260	3,571
2017	0	0%	0	0	0	0	0	3,571
2018	0	0%	0	0	0	0	0	3,571
2019	0	0%	0	0	0	0	0	3,571

New units: number of units that opened for lease-up during the year; **New % stock:** new development that opened during the year as a percent of the total units in the market area; **Conversions:** units converted to condominiums during the year; **Demol:** units demolished during the year; **Subsid:** units converted to tax credit or other subsidy during the year; **Reconvert:** units added to the market rate apartment stock through reversion from condominiums, tax credit, subsidies, etc.; **Net change:** net number of units added/ded during the year; **Total units:** total market rate units at the end of the year.

Though 2010 there were 1639 apartments total in Ballard. In the years 2011-2016 there are 2000 apartment units either opened or opening. That means there are 22% more apartments opening between 2011-2016 than existed in 2010. Adding the 2010 apartments that were not absorbed yet by the census study, a total of 2134 apartments will open between 2010 and 2016. At 1.8 residents per apartment, this means 3841 new residents in Ballard by the end of 2017, excluding any units built in that year. Ballard will have 33,421 residents by the end of 2017 just due to apartment growth. If we add in the 137 condo units under construction and 108 new townhouses from 2011-present, the total 2017 population is 33,984: passing the PSRC 2035 projection 18 years early.

Over the next 20 years, all these figures will likely grow a great deal. Seattle grew by 18,000 people

394-3

between July 2012 and July 2013. Simply carrying that absolute growth rate forward, 396,000 people would move to Seattle through July 2035. At least some of them will move to Ballard.

Why it matters:

Though Ballard already rates highly in the Ballard to Downtown and Ballard to UW studies, these numbers are used to communicate the value of the project to stakeholders and to the federal government. Higher population in this area means higher ridership. It is not in our best interest to short population and ridership projections when competing with other cities and states for federal funds or when talking to local stakeholders about how great the need is for high capacity transit to Ballard as soon as possible.

Sound Transit is now a mature agency with 15 years of experience delivering projects under budget and ahead of schedule. While it is understandable that an agency would rather under-promise and over-deliver, it should use the most accurate numbers possible to create its estimates. It shouldn't start out by using artificially low input numbers and a known overly conservative algorithm.

The comment period for this study is over, however Sound Transit is now accepting comments in relation to its Long Range Plan. Please ask Sound Transit and the PSRC to review and update their projections based on current conditions so that we have an estimate that is close as possible to what we will really see in 2035. It can help us get better transit faster and have more of it paid for by the federal government. Win – win – win.

394-4

4. Study the Sand Point Crossing — it's a better routing and the Trans-Lake Washington crossing study does not exclude this area from being studied.

The Puget Sound region is defined by its waterways. Puget Sound congestion is defined by its water crossings. Focusing on existing crossings of Lake Washington may have unnecessarily constrained Sound Transit's study of the best northerly route across the lake.

ST's options to get from UW to Kirkland on to Redmond are on pages 3-9 of the [Central and East HCT Corridor Study](#). Each of the options presented misses opportunities to connect major population and employment centers and contains enormous challenges, such as a new bridge crossing of the Montlake Cut.

There are many of the problems with a 520 light rail crossing. Using 520 forces ST to double back on the west side of the bridge and deliver riders to the east side far from good transit destinations. Below, we will focus on what we want Sound Transit to study, why we want it, and why you should join us in supporting it.

394-4

Please see the response to common comment 9 - Sand Point Crossing in Section 5.3.2 of Chapter 5 of this Final SEIS.

394-4



the Sand Point Crossing

The Sand Point Crossing

This option doesn't resemble the ST corridors at all: it's a completely different idea. The way to solve the problems with 520 is to create a crossing for rail only from Sand Point to Kirkland.

Benefits:

1. On the west side of the lake there are three meaningful destinations that would be missed by a 520 alignment on the west side of the lake.
 - U-Village: A major shopping destination also has significant residential development in its walk shed to the north.
 - Children's Hospital: Employs 8000 people and has many times that in visitors. A major employment center and key destination.
 - Magnuson Park: In addition to being a major attraction, there is also some residential density to the west.
2. The Sand Point way crossing creates a direct connection from Ballard and neighborhoods north of the ship canal to Microsoft and Eastside employers. This connection is also critical for Eastside residents, creating or shortening connections to jobs at Children's Hospital, UW, and Downtown Seattle as well.
3. Sand Point to Kirkland is the shortest possible crossing of Lake Washington, mitigating

394-4

the added expense of a new rail crossing. Several of the crossing options studied by Sound Transit along 520 require additional pontoons and bridge lanes or even a new rail bridge across Montlake. The cost of this new rail crossing at Sand Point could be competitive with the options already studied by Sound Transit while providing much greater benefits.

4. Service is direct to downtown Kirkland, the 12th largest city in Washington state and a residential and entertainment district. Additionally there are transit transfer connections via the Kirkland Transit Center right after the crossing lands on the east side of the water.
5. From Kirkland it is direct to Redmond Town center along 85th/Redmond Way. Redmond is the 10th largest city in Washington State. Redmond town center is also the target of the East Link extension. A connection there would add to operating efficiency and connect riders directly to Microsoft and Downtown Bellevue.

We believe a separate Sand Point Crossing will serve many more people more reliably and faster than any of the options Sound Transit presented. Although ST studies usually involve serious constraints, we believe that a new Sand Point Crossing deserves full study for methodical comparison to the currently lacking 520 alternatives.

Why didn't Sound Transit study the Sand Point crossing?

In ST's DSEIS for the Long Range Plan update, ST disqualifies the Sand Point crossing [on page 2-33](#) because the Trans-Lake Study, conducted by WSDOT in 1998, excluded it. We filed a public disclosure request to WSDOT and received the [study](#) and technical appendices, split into parts [1](#) & [2](#). What we found in the study was surprising.

While the study excluded the Sand Point crossing as an option for a highway, it appears the highway was the real focus of the study – not rail. This is no surprise, as WSDOT wrote it 16 years ago. There was an option resembling a new Sand Point Crossing for light rail called "T4." You can find it on page 1-4 of technical appendix [1](#), listed in a section called "concepts to be further evaluated" with the notes: "With service to two urban centers this would clearly have good ridership potential."

There is no evidence of further evaluation of this alternative. Job and population growth over the past 16 years make this corridor worthy of another look. That's right: The study that Sound Transit references as a reason not to study a Sand Point rail crossing says a Sand Point rail crossing should be studied further. Another surprise: In this corridor WSDOT considered a floating tunnel the most viable of the tunnel options. Sound Transit should complete a study of this corridor and a floating tunnel.

394-5

5. Study the highest quality option for Ballard to UW.

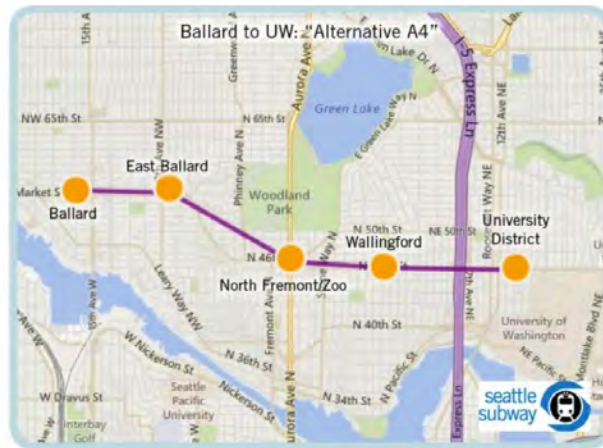
Sound Transit should throw out all the options that are not 100% grade separated because any portion of the line that interacts with traffic subverts the speed, reliability, and utility of the whole line. Unfortunately, that leaves us with only one presented option: Alternative A3, titled “via Wallingford Tunnel.”

A3 is a very good start. It is fully grade separated and very fast. Travel time would be as low as just 6 minutes, ridership as high as 26,000/day, and the cost would be just under \$1.4-1.9 Billion. This corridor is the highest performing in cost per rider of any corridor Sound Transit has studied so far.

A Better Ballard to UW “A3” Option

A3 does have one glaring weakness, however: it needs more stations. A density map of that part of Seattle shows that several dense areas along the A3 alignment would be ideal for walking, biking, and transit connections if Sound Transit carefully located the stations. A3 offers only one station in the 3.5 miles between Ballard and the University District. This stop spacing is too suburban for an area with many dense neighborhoods and attractions. Closer stops would maximize the utility for both pedestrian access and transfers from other modes. This corridor is dense enough to justify full subway spacing of stops — which would mean full coverage of the corridor by the new line, replacing the need for the slow-as-molasses 44.

The good news is that adding just two stations and moving the Wallingford Station would maximize connections to both attractions and transit.



Alternative “A4”

394-5

Please see the response to common comment 4 - "Ballard Spur" ("A4" alignment) in Section 5.3.1 of Chapter 5 of this Final SEIS.

Alternative “A4” adds the following stations to Alternative A3:

1. South Phinney/Zoo/North Fremont/West Wallingford

What do all of these locations have in common? They are walkable from a station that stretches between Aurora and Fremont Ave N with station entrances located on either side. This area is densely populated and has more people in its walkshed than the Wallingford Station pictured in A3. It would provide an easy connection to attractions in North Fremont as well as the Woodland Park Zoo and East Wallingford. It also would add direct connections from buses traveling along the Aurora corridor, Fremont Ave N, and Phinney Ave N. A station at this location with well placed entrances would also expand its walkshed by making the station easily accessible from both sides of Aurora despite the hill and busy arterial (46th.) Sound Transit **MUST** add this station.

2. East Ballard

This station should be located to the east of 8th and Market and would serve people to the east of the 17th/Market walkshed as well as act as a connection for buses travelling on 8th Ave NW. When compared to the blockbuster stations on this line like 17th/Market, Aurora, and University District – this stop doesn’t rate well. That said, take another look at the residential [density map](#) – more people live near this stop than any of the current Link stations in the Rainier Valley. This station would also have good connectivity to buses that travel north/south on 8th such as the 28 and could possibly be built at a lower price due to a likely shallow tunnel at this location and less of a need to add frills to the station design. Additionally, we think it’s critical to not view this stop in isolation, this station is required to fully connect the walkshed in highest priority corridor in Washington State. For this reason alone Sound Transit must add this station.

Alternative “A4” also **moves the Wallingford station**. This station should be located in the center of Wallingford so that it is walkable from all sides. West Wallingford where the station is currently located should be covered by the North Fremont/Zoo station – so it makes sense to move it east. 45th and Meridian is a good starting point for analysis. The goal of this station is to be within the bike/walkshed of nearly all of entertainment district of Wallingford.

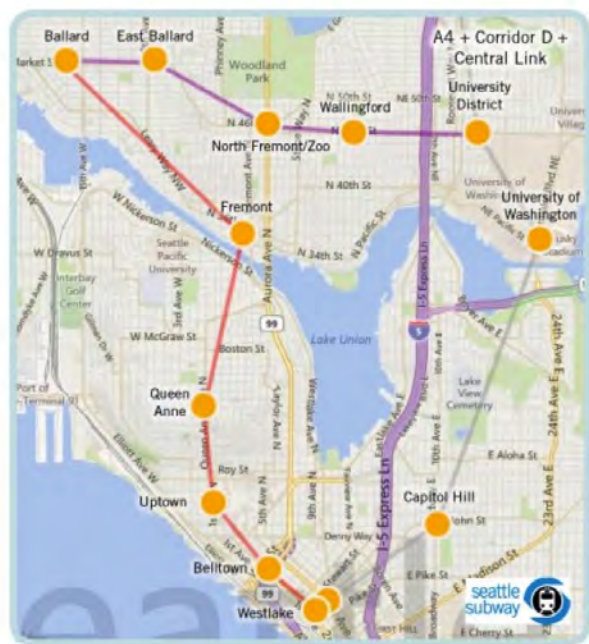
The station layout we recommend above would mean total coverage of this dense east-west corridor and a likely travel time under 10 minutes. Currently, that time isn’t possible without a helicopter. It is our opinion that each of these stations would significantly add to the utility and ridership of this line. We believe that this stop spacing will deliver maximum benefit for the cost of adding just two stops. We only get one chance to build this: let’s build the best option possible. Let’s build a better Ballard to UW option, “A4”!

Contingency Planning

After the two rounds of public input on Ballard to Downtown, Corridor D was clearly the most popular line, with 76% of the support in public comment. If Corridor D is built, Alternative “A4” is the clear winner for UW to Ballard, as lower Fremont will already have a station. However, if

Corridor D is impossible to build for engineering or budgetary reasons, we need a fallback route for Ballard to UW that is fully grade separated and serves lower Fremont in route to Ballard.

That is why we need Sound Transit to study a tunnel in the C1 alignment. Alignment C1 shows an elevated path along 45th through Wallingford, then turns south to lower Fremont via Stone Way and uses a N 36th Street and Leary Way alignment to Ballard.



“A4”, Corridor D, and Central Link

394-6

6. Study a better Eastside corridor.

As the Puget Sound region continues to grow, excellent transit connections between Eastside communities will be crucial. The quality of transit options available to those communities will shape the safety, convenience and environmental quality possible for their residents and workers. Our vision for rail service to Issaquah would create new connections from Issaquah through Bellevue to Kirkland, would improve trips bound for Downtown Seattle, and would dramatically improve access between the I-90 corridor and North Seattle.

394-6

Please see the response to common comment 5 - Kirkland-Bellevue-Issaquah ("C4" alignment) in Section 5.3.1 of Chapter 5 of this Final SEIS.



Better Connections

The crucial connection missing from Sound Transit's study is one across the Mercer Slough along I-90 to East Link. Such a connection is crucial for the viability of rail service to the I-90 corridor, as it is the only way to provide direct trips from Issaquah to Downtown Bellevue and Downtown Seattle. Option "C4" provides a direct rail connection through Downtown Bellevue to Kirkland, as well as preserves the ability to run trains directly from Issaquah into Downtown Seattle in the future when an additional operating line is warranted. This will be critical for providing a time-competitive rail option for I-90 commuters.

Improved Coverage

Sound Transit's studies for the corridor are also conspicuously short on stations. Over 16.6 miles, The rail options in Sound Transit's study for Kirkland-Bellevue-Issaquah rail include just 6 stops. For perspective, Central Link is 15.6 miles long and stops 13 times. While there are fewer population centers on the Eastside than Seattle, those that do exist are largely left out of Sound Transit's alternatives, leaving only a handful of destinations along the corridor within walking distance of a station. Neglected destinations include Factoria, Bellevue College, Lakemont Boulevard, and Historic Issaquah. One advantage to fewer stops is slightly faster travel times along the length of the corridor, but pitting ridership against coverage is a losing proposition: a viable system needs both and should be designed accordingly.

The success of any regional ballot measure will require a strong Eastside turnout, as was the case in 2001 and 2008. This means Sound Transit will need to offer Eastside communities tangible benefits that substantially improve mobility options to, from and around the Eastside. To do this, it is critical that Sound Transit consider an option that provides high quality connections across the lake as well as between Eastside population centers, serves all important destinations, and keeps travel times low.

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394-7

7. Present an option to the board for West Seattle that is easier to include in ST3.

Let's get this on the table right up front: West Seattle should receive a light rail line in the next Sound Transit funding package (ST3). The ST Board needs to be presented with options for what might actually be included in the next regional package. We think that a better presentation of the information contained within this study would serve the Sound Transit board and West Seattle well when it comes time to select corridors for ST3. As currently presented, the study makes the West Seattle line appear less cost effective than it should be. Seattle Subway has some suggestions to improve this.

As others have noted, this study is comprehensive to the point of being difficult to comprehend, and contains routes and options that cost more than \$8 billion and are well beyond what the region will build in near future. We have two main requests to help make this information easier to understand and analyse.



1. Option "A6"

This option would connect the West Seattle peninsula to downtown and the rest of the regional rail system with stops only at the Alaska Junction and North Delridge. It is similar in concept to the northernmost portion of Sound Transit's Option A5, but with the addition of a North Delridge stop. It would allow for future expansion, as funding beyond that included in ST3 becomes available, into a long tunnel much like ST's Option A5. This option should identify future rail options and be built with expansion in mind.

394-7

Please see the response to common comment 7 - Downtown to West Seattle ("A6" alignment) in Section 5.3.1 of Chapter 5 of this Final SEIS.

394-7

The intention of A6 is to find the least expensive/highest performing fully grade separated rail option to locations that allow for frequent bus connections. The North Delridge station is crucial to good bus connections, as Route 120, West Seattle's highest-performing bus line, could not connect to the line otherwise. It would also allow for much easier connections to South Seattle Community College, White Center, and Westwood Village. The Alaska Junction station would allow for connecting bus service to most of the rest of West Seattle, including a frequent route that would duplicate the remainder of today's RapidRide C Line; a more frequent version of Route 50 to Admiral and Alki; a more frequent version of Route 128 to High Point; and other less frequent service to lower-demand neighborhoods.

The option allows better service to more of West Seattle than any of ST's existing options, and given its short length should be affordable in ST3.

394-8

2. Present the costs of the new Downtown Transit Tunnel separately from the West Seattle segment.

Several routing options for new tunnel segment from the International District Station to Westlake were also presented as part of this study. We think those options and their costs require a more in-depth presentation. The section of the new downtown tunnel from International District to Westlake has its costs and options buried within this study. The downtown tunnel options are expensive and largely separate from routing concerns in West Seattle. It's critical that the board fully understand the options.

All three of the Seattle corridors that ST has studied (Ballard to UW, Ballard to Downtown, and West Seattle to Downtown) are critical to Seattle mobility and should be included in the ST3 plan. North King County will potentially have enough capital to complete all three corridors due to subarea equity and federal grant eligibility.

Today, West Seattle suffers from lack of resilience given the low number of Duwamish crossings and their susceptibility to disruption. When the West Seattle Bridge experiences major issues, it can cause serious headaches for the entire peninsula. Having another option – one with the speed and reliability that only grade-separated rail can provide—to connect West Seattleites to downtown Seattle and beyond would go a long way to solving that issue. That is why we urge Sound Transit to present options to the Sound Transit board that focus on getting rail to the peninsula, rail designed for future expansion, and make the costs and options related to the downtown tunnel sections of the line fully separate and apparent.

394-8

Recognizing that the high-capacity transit corridor studies did provide order of magnitude cost estimates for alternative alignments, the Long-Range Plan Update SEIS focuses on corridors (not alignments) and does not provide or present any cost estimates. Cost estimation would, however, be a part the system planning process that could follow adoption of an updated Long-Range Plan. As part of system planning efforts, cost estimates would be presented in a manner that best informs the Sound Transit Board of Directors in their decision making and your comment is noted.

Appendix A: Goals and objectives for Sound Transit's Long-Range Plan Matrix:

Goals and objectives for Sound Transit's Long-Range Plan	
<ul style="list-style-type: none"> ► Provide a public high-capacity transportation system that helps ensure long-term mobility, connectivity, and convenience for residents of the central Puget Sound region for generations to come <ul style="list-style-type: none"> ▪ Enhance regional mobility through improved travel time, reliability, and customer experience ▪ Provide reliable, convenient, and safe public transportation services to regional growth centers and create an integrated system of transit services ▪ Increase the percentage of people using transit for all trips ▪ Provide an effective and efficient alternative to travel on congested roadways 	<ul style="list-style-type: none"> ► Strengthen communities' use of the regional transit network <ul style="list-style-type: none"> ▪ Use HCT to create opportunities for transit-oriented development around transit stations and centers consistent with local land use plans ▪ Support the ability of communities to develop in a manner consistent with state and regional laws and growth management policies ▪ Create HCT stations that are easy to access by foot, bicycle, and local transit, as well as by people who are transit-dependent
<ul style="list-style-type: none"> ► Preserve and promote a healthy and sustainable environment <ul style="list-style-type: none"> ▪ Conserve land and energy resources, and improve air quality while also reducing greenhouse gas emissions and other pollutants ▪ Minimize potential adverse impacts on the natural and built environments ▪ Help limit urban sprawl, maintain open space, and protect natural resources 	<ul style="list-style-type: none"> ► Improve the economic vitality of the region <ul style="list-style-type: none"> ▪ Enhance the region's ability to move goods ▪ Make it easier to use transit to reach jobs, education, community resources, and commercial centers throughout the region ► Create a financially feasible system <ul style="list-style-type: none"> ▪ Improve financial sustainability ▪ Maintain, operate, and expand regional HCT services in a cost-effective manner ▪ Support and build upon the existing regional HCT system ▪ Avoid competitive, duplicative transit services

Draft Supplemental Environmental Impact Statement, Chapter 1 – Purpose and Need for the Long-Range Plan Update, Page 1-5.



July 25, 2014

Sound Transit
Attn: Karin Ertl
401 S. Jackson Street
Seattle, WA 98104

Re: Sound Transit's Draft SEIS for the Regional Transit Long-Range Plan Update

Dear Ms. Ertl,

Thank you for the opportunity to comment on Sound Transit's Draft Supplemental EIS for the Long-Range Plan Update (DSEIS). As the owner of nearly 350 developable acres in Tukwila, Segale Properties LLC (Segale) is keenly interested in the future of transit in the Puget Sound region. Segale appreciates Sound Transit's efforts in improving transit in our area and looks forward to working with Sound Transit to explore specific transit opportunities within our Tukwila South project.

Segale's "Tukwila South" project is a fully permitted, shovel-ready, master planned mixed-use development that is slated for up to 10.3 million square feet of new building area. Planning for Tukwila South began in 2002, with environmental review occurring in 2005 and the City of Tukwila and Segale entering into a development agreement in 2009. Both Segale and the City of Tukwila have invested significantly in infrastructure and have worked closely together to position Tukwila South to emerge as the region's premier multi-use regional employment center containing technology, office, commercial and residential uses.

Although Tukwila South is uniquely located in proximity to Sea-Tac airport and two major freeways, the area is not served by any form of transit. Tukwila South will soon be home to major employers; though we anticipate many employees will also live at Tukwila South, we cannot ignore the reality that as a major employment center many Tukwila South employees will be commuting from outside the area. During the environmental review process Tukwila South was estimated to generate 10,166 net new PM peak hour trips at full build-out. The 10,166 new trips may not occur immediately, but they will certainly occur and now is the time to plan for a transit system that will reduce those vehicle trips.

PO BOX 88028 • TUKWILA, WA 98138 • 5811 SEGAL PARK DRIVE C • TUKWILA, WA 98188
P 206.575.2000 • F 206.575.1837 • www.segaleproperties.com

491-1

As the Link light rail system is expanded southward (e.g., Angle Lake station opens in 2016, followed by Kent/Des Moines in 2023) opportunities will occur for local and commuter bus routes to be modified and/or added in order to connect riders between these stations and their environs. The Tacoma South area could be served by these new/revised services. In the shorter term, deviations by current Metro routes 157 and 180 from Orillia Road, and route 906 from S. 180th, could serve the future development area.

491-2

Our review of the DSEIS revealed that not only was Tukwila South excluded as an area to be served in the Plan Update, it wasn't even mentioned in the discussion of the Plan's consistency with Tukwila's land use planning (Appendix F, page 29). Given that Tukwila South is a shovel-ready project, and not simply a plan or proposal, the project merits close attention from Sound Transit and to be included in the Long-Range Plan Update. Failing to consider Tukwila South in this DSEIS may result in Sound Transit being unable to meet the demand for transit that Tukwila South will undoubtedly create.

Segale respectfully requests the opportunity to meet with representatives from Sound Transit to discuss Tukwila South and to explore opportunities for bringing high-capacity transit to the Tukwila South area.

Very Truly Yours,

SEGALE PROPERTIES LLC



Mark A. Segale

Cc:

Mayor Jim Haggerton
Executive Dow Constantine
Councilmember Dave Upthegrove

491-2

The discussion of Tukwila in Appendix F of the Final SEIS has been revised to include Tukwila South, and its relationship to the regional transportation plan. The level of detail is consistent with and appropriate for the broad, plan-level issues being addressed in the Long-Range Plan Update.



(P) 425.743.4567
info@economicalliancesc.org
www.economicalliancesc.org

808 134th Street SW
Suite 101
Everett, WA 98204

July 16, 2014

RE: Comments on Sound Transit 2014 Long Range Plan Update EIS – HCT Corridor, Lynnwood to Everett

Dear Sound Transit Board of Directors,

The Snohomish County Committee for Improved Transportation (SCCIT) is a public/private, nonpartisan transportation interest group whose principal goal is to foster an integrated transportation system in Snohomish County that serves the regional interest in line with Vision 2040. We are affiliated with Economic Alliance Snohomish County (EASC) and have broad support from business and Snohomish County cities and towns. Together, we express our strong support for the following proposed Lynnwood to Everett High Capacity Transit (HCT) Corridor updates/alternatives to the Long Range Plan:

- Corridor H
 - Alternative 15 (Option A) – ST 3 light rail extension to Everett via Paine Field
 - To serve major transit hubs, employment centers and high population areas
 - Alternative 4 – ST3 Expansion to North Everett
 - To serve the expanding Providence Hospital, Everett Community College and Washington State University campuses

SCCIT and EASC do not support Options D and E which would supplant the light rail system in contravention of the 1997 Sound Move program approved by voters. Both Visions 2020 and 2040 have designated Everett as one five Metropolitan Centers which are to become key economic and population centers for Puget Sound. The Sound Transit system was based on this hierarchy of communities, with the light rail "spine" linking the Everett-Seattle-Eastside destinations.

The Paine Field alignment serves one of the region's Manufacturing Industrial Centers (MIC), which has taken on added importance with the expanding market for Boeing aircraft, the emphasis on support industries for aerospace and the likely introduction of limited commercial air service at Paine Field. Boeing is already feeling stress on its employee parking facilities; access roads to the MIC will also feel the stress that will come with growth. The light rail extension to Paine Field can only help in efforts to preserve road capacity through alternative means.

497-1 | While supporting Option A, we also urge its modification to exclude Evergreen Way as the route from Paine Field to downtown Everett and the two colleges and medical center. Evergreen Way is a major tax revenue producer with many vital businesses. These could be disrupted or eliminated by an Evergreen Way alignment. An alignment from Paine Field back to I-5 seems the most logical.

Sound Transit Phase 3 to Everett is a major generational investment for the Puget Sound region. We believe it is essential that the rail expansion serve the major employment centers in the region, including Paine Field as well as the growing research/educational/medical district in North Everett.

497-2 | EASC and SCCIT also support consideration of expansion of the Sound Transit taxing district to include north Snohomish County (Tulalip, Marysville and Arlington) and east Snohomish County (Snohomish and Monroe). Doing so will better serve transit users in those areas as well as support future service on potential corridors such as the Eastside Railroad. As our region grows and the North Puget Sound Manufacturing Corridor expands with a potential Manufacturing/Industrial Center in the Arlington-Marysville area, high capacity transportation facilities will help preserve freight and vehicle capacity on our roadways. We recognize that, ultimately, the voters would have the opportunity to weigh the advantages of expansion to the north and east.

ADVOCATE • DEVELOP • CONNECT

497-1

All of the corridors studied in the Final SEIS are intended to reflect a general area within which high-capacity transit could be implemented. The current Long-Range Plan explicitly states that "the lines on the map representing future service investments are intended to show general corridors that would be served, and do not represent specific routings or alignments." As described in Section 2.2.3 of the Final SEIS, the ST2 transit package approved by the region's voters in 2008 funded several high capacity transit corridor studies that were completed in summer 2014. As discussed in Section 2.2.3 of the Final SEIS these studies included the Lynnwood to Everett corridor.

Option A – I-5/Airport Road/SR 526 Light Rail evaluated as part of the Lynnwood to Everett HCT corridor study includes a curve west to reach the PaineField/Boeing Everett area and then heads back to follow SR 99/Evergreen Way into Everett. While the HCT corridor studies provide information on travel markets, mode and route options, potential ridership, and conceptual costs estimates, they do not recommend particular modes or alignments. Furthermore, specific alignments are not be identified in the updated Long-Range Plan. For those corridors that are ultimately funded and implemented, more detailed project-level reviews will occur in the future including a more in-depth alternatives analysis that evaluates various alignment options. At that time, the public will have additional opportunities to review and comment on those alignment options.

Implementation of light rail could have long-term impacts on adjacent land uses including the displacement of businesses. The extent of such impacts would be determined during any future project-level reviews that would occur if the Sound Transit Board were to select light rail on SR 99 through Everett. Please see Section 4.9.5 of the Final SEIS for a discussion of potential mitigation measures in those instances where property acquisition and displacements would be unavoidable.

497-2

Please see the response to common comment 11 - Providing HCT service to areas outside the current Sound Transit District boundary in Section 5.3.3 of Chapter 5 of this Final SEIS.

www.economicalliancesc.org

Thank you for this opportunity to comment on this extremely important issue.

Sincerely,



Troy McClelland
President & CEO
Economic Alliance Snohomish County



Reid Shockey
President
Snohomish County Committee for Improved
Transportation



44-1

Sound Transit operates regional ST Express bus service. Fare is set to meet farebox recover policy and is anticipated to track inflation over time. Sound Transit does not intend to reduce ST Express bus service on its routes.

44-1 |

Sound Transit Long-Range Plan Update - RECORD #44 DETAIL

Submission Date :	6/19/2014
First Name :	Deanne
Last Name :	Belinoff
Submission Content :	<p>BEFORE we become involved in support for any long range plan, please inform us re: busfare increases and reduced service.</p> <p>Sincerely, The Downtown Council of Concerned Public Transit Group.</p> <p>Deanne Belinoff</p> <p>Deanne Belinoff http://www.deannebelinoff.com www.deannebelinoff.com Seattle 98104 206 458 0762</p>



July 28, 2014

Sound Transit
Attn: Karin Ertl
401 S. Jackson St.
Seattle, WA 98104

Re: Long-Range Plan Draft Supplemental Environmental Impact Statement

Dear Ms. Ertl,

Thank you for this opportunity to comment on the Long-Range Plan Update Draft Supplemental Environmental Impact Statement. The current update of Sound Transit's Long Range Plan and subsequent System Plan is a pivotal process that will help determine the future of high capacity transit (e.g., Link light rail, bus rapid transit, regional express, and commuter rail) build-out and resulting development patterns in the Puget Sound for the next 50 years. Decisions made now will guide how and what will get built in the next Sound Transit package.

Expansion of high capacity transit is a vital component of the Central Puget Sound's future regional transportation infrastructure, providing a fast, reliable, economically and environmentally sustainable way for our growing population to reach homes, jobs and destinations. Expansion of high capacity transit can also maximize existing, and catalyze new, vibrant and affordable communities, thereby creating great places for all people to live and work. Now is the time for Sound Transit to create a vision for expanded high capacity transit that commits to creating communities of opportunity all around the Puget Sound.

We are a coalition of environmental, mobility, immigration rights and social justice organizations invested in the expansion of future high capacity transit system in the Puget Sound. It is representing these varied, but inexorably intertwined perspectives that we offer the following comments.

General

Because the fiscally unconstrained Long-Range Plan will represent the universe of projects, corridors, and policies that the next system plan will draw from, it is important that this larger set of projects, corridors, and policies reflect both our medium- and long-term goals for transit.

Generally, we advocate for high capacity transit in areas with the highest ridership potential and highest potential for equitable transit-oriented development (TOD), while balancing the need for geographic distribution. Using this general framework for expansion -- along with strategic policies that improve equity and multimodal access -- will help Washington State and the Puget Sound meet both greenhouse gas emissions reduction limits and demand for affordable and accessible public transportation as population and employment in the region continue to grow.

In the aftermath of the great recession, success at the ballot is not guaranteed, and it is more important than ever that voters have faith in Sound Transit's ability to use taxpayer dollars efficiently and responsibly, free of political pressures. Unlike previous Sound Transit measures focused on creating the network itself, the next measure will leave the Board with far more discretion. By using a transparent and rational selection criteria to craft the next system expansion plan, Sound Transit can show voters how they will equitably deliver service and facilities that provide real, tangible, and measurable benefits: improved public health, economic growth, environmental justice, safe multimodal access, community resiliency, and opportunities for the development of affordable, walkable communities.

480-1

Sound Transit should continue to improve multimodal station access and infrastructure

We strongly support the adoption and retention of policies in the Long-Range Plan that encourage and facilitate pedestrian, bicycle, and transit access to Sound Transit stations.

We would like to see Sound Transit continue to provide and improve safe, connected biking, walking and transit routes to and from stations; including an evaluation of existing and planned bicycle and pedestrian infrastructure near stations for opportunities to increase access and bike/pedestrian safety to the station. To assist with these goals, Sound Transit should consider the creation of a non-motorized access policy.

When building new stations, Sound Transit should study infrastructure costs of improving non-motorized access in addition to, or in replacement of, building parking facilities. There should be a comparison of the long-term cost per extra rider for non-motorized access improvements versus Park & Ride stalls. These considerations (in addition to projected increases to ridership) should be included in the pro forma when identifying how many Park & Ride spots are necessary. This is also consistent with the Federal Transit Administration's August 11, 2011 policy statement on bicycle and pedestrian improvements, which recognizes the direct linkage and funding eligibility of all pedestrian improvements within a ½ mile radius and all bicycle improvements within a 3-mile radius of a transit stop or station. A non-motorized station access fund should be created in order to support the abovementioned policy and subsequent evaluation work.

480-2

Sound Transit should adopt parking policies to balance demand with costs

In order to cover construction, maintenance, and operation costs, we also recommend that Sound Transit charge drivers for parking at all parking facilities. Charging for parking also maximizes utilization of limited parking facilities, and helps discourage non Sound Transit riders from using the lots. We encourage Sound Transit to incorporate best practices of other transit agencies across the country and integrate fare payment with parking payment. Riders should be able to pay for parking with their ORCA card on a daily basis or their ORCA accounts on a monthly one. We also encourage Sound Transit to coordinate and partner with other transit agencies, municipalities, and WSDOT on parking strategies and develop a regional parking management and paid parking plan.

Similarly, the Long-Range Plan should look at existing station retrofits to improve non-motorized state access and connectivity.

480-1

As indicated in Appendix A of the Final SEIS, the Current Plan Alternative includes a number of access related representative projects, including many possible improvements to non-motorized access. Examples include "Improve non-motorized access to stations" and "Provide improved system access." In addition, Sound Transit has a "Bicycle Policy" and a "System Access Policy" that includes guidance on the provision of bike parking and accommodations and policies that relate to non-motorized access. Over time, Sound Transit may modify these policies or develop new policies in response to evolving conditions and needs.

More detailed project-level analysis will be conducted in the future for projects that are implemented as part of a future system plan. The project-level analysis will include analysis of multi-modal access to stations, including non-motorized access.

480-2

Please see the response to common comment 16 - Increase parking availability at HCT stations in section 5.3.4 of Chapter 5 of this Final SEIS.

In July 2013, the Sound Transit Board approved a 2014 pilot program to test several strategies for helping customers access public transit by managing parking more efficiently. The pilot program includes:

- Offering optional limited permit parking for frequent riders at select locations
- Providing real-time customer information about parking availability at select locations
- Collaborating with rideshare programs

Additional information on this parking pilot project can be found on Sound Transit's web site: <http://www.soundtransit.org/RiderGuide/Parking/Parking-pilot-project>

480-2

Specifically, we support the following representative policies listed in the Draft SEIS (Appendix A):

- Increase costs for Park & Ride use
- Stop building new Park & Ride capacity
- Improve non-motorized access to stations
- Pedestrian access and circulation information/wayfinding
- Provide improved bicycle storage, including bike share

We do **not** support the adoption or retention of the following representative policies:

- Provide increased Park & Ride capacity
- Provide parking mitigation to cities with stations

Sound Transit should expand the importance of social equity considerations into operations and service planning

We strongly support the adoption and retention of policies in the Long-Range Plan that help Sound Transit incorporate equity into both daily operations and service allocation decisions. This includes both a reorientation of the importance of equity to Sound Transit's mission but also a prioritization of including historically excluded communities in all aspects of planning.

The largest proportion of population growth in Puget Sound region has been people of color, immigrants and refugees and our cities and counties are more culturally and linguistically diverse than ever before. As Sound Transit expands its services, recognizing these changing demographics will be increasingly important. Sound Transit must work to provide these diverse communities with equal opportunities to access Sound Transit buses or trains, such as outreach to promote ORCA account use, and to participate fully in the planning process. Underserving our new populations will result in a less effective system and failure to capture critical markets due to a lack of modest, upfront investment in inclusionary planning.

For example, we believe that Sound Transit should continue to expand existing language accessibility at rail stations and on buses, in outreach and educational materials, and in customer service for those with limited English proficiency.

480-3

Additionally, when determining service levels or making decisions about system expansion, Sound Transit should make an extra effort to bring efficient, high-frequency, and accessible transit service to low-income and minority populations, both of which are often disproportionately transit-dependent and underserved by transit investments. This is not an exercise of merely adjusting a few routes to be near low-income census tracts, but to identify how new service can be combined with transit oriented development (see below) to maximize connectivity for these communities. The benefits of this approach will be wide ranging, from catalyzing economic development to reducing emissions to better connecting communities in the region.

480-4

To provide for more meaningful consideration and analysis of the distribution of impacts across all demographics, Appendix J should be updated to provide greater geographic detail.

Key to this decision-making process will be to develop and sustain meaningful relationships with these communities, which will strengthen Sound Transit's current outreach and create new opportunities for more

480-3

Sound Transit's Transit Oriented Development (TOD) Program Strategic Plan Update (April 24, 2014) addresses Sound Transit's strategic priorities for TOD. In this update, the most significant new direction from the 2012 TOD Policy is that Sound Transit will assess TOD early in transit system planning. During planning efforts, Sound Transit will identify TOD potential along potential transit alignments based on a variety of characteristics including demographics and the presence of existing poverty, minority, and zero-car ownership populations.

480-4

The State Environmental Policy Act (SEPA) does not specifically require consideration of environmental justice concerns when conducting environmental analyses. However, Sound Transit prepared an Environmental Justice Study for the Long-Range Plan Update SEIS (Appendix J) in order to broadly evaluate potential impacts and/or benefits to minority and low-income populations at a level of detail appropriate for a plan-level EIS. More detailed analyses would be developed for specific corridors that are ultimately implemented as part of a system plan.

480-5

inclusive engagement at all stages of planning and implementation of high capacity transit service.

Sound Transit should prioritize Transit-Oriented Development (TOD) in its near and long term planning

We strongly support the adoption and strengthening of policies and projects that encourage transit-oriented development. We should put high capacity transit close to where the people are and the institutional and commercial destinations to which they regularly travel; not just where we have the right of way. Through its update to the TOD policy, Sound Transit has recognized that light rail is not an end in itself but is a critical means for connecting housing, jobs and high capacity transportation. Sound Transit must align its decision-making to reflect this recognition, its goal is not to just build and operate high capacity transit (HCT) so TOD may occur but to use HCT as a critical tool in the region's broader goal for place-making at future stations and urban centers.

Clustering both jobs and housing around transit stations helps residents use transit for more trips, easing road congestion for all, reducing vehicle miles traveled, and making it easier to give up car ownership. Without transit-oriented development, in conjunction with improved station access, we will not be able to significantly reduce transportation-related greenhouse gas emissions.

Therefore, we recommend that Sound Transit select corridors, station sites and alignments based on existing density or the potential to foster dense, transit-oriented development and consider incentives for accelerating equitable transit-oriented development at existing and future stations. For example, Sound Transit should continue to facilitate opportunities for affordable housing near transit by collaborating with cities, affordable housing partners, and developers, as described in the agency's Real Property Excess, Surplus, and Disposition Policy.

Thirty-three partners across the region, including Sound Transit, have signed the Growing Transit Communities Regional Compact, pledging ongoing collaboration to create equitable transit oriented communities. The Long Range Plan should be updated to reflect this commitment.

When building out the area around a station, we believe that Sound Transit should evaluate not only the potential for parking garages and maintenance facilities, but also affordable housing, transit-oriented development, and bicycle, pedestrian and transit infrastructure, which can help achieve both Sound Transit's ridership targets and the state's and region's requirements to reduce vehicle miles traveled and greenhouse gas emissions.

Specifically we support improving the following program elements listed in the Draft SEIS (Appendix A):

- Prioritize and financially support construction of transit-oriented development
- Support implementation of the Growing Transit Communities compacts and corridor strategies
- Support transit-oriented development through station development and design
- Support transit-oriented development through density incentives

Sound Transit should invest in high ridership corridors

High capacity transit requires significant capital investment. Sound Transit must continue to direct its limited transit dollars towards expanding high capacity in this region into centers and corridors where transit makes sense. Decisions for Sound Transit's long-range planning should be rooted in sound planning principles not politics. Sound Transit is legally required to align its system plan with the goals established by the Puget Sound Region Council's Vision 2040. It will be critical that Sound Transit 3 not treat all designated centers or cities equally; Vision 2040 directs a greater growth of jobs and housing in metropolitan and core cities, and more specifically inside PSRC

480-5

Sound Transit recognizes the importance of TOD and the Growing Transit Communities Regional Compact. As part of the next phase of implementation for the Long-Range Plan, further details on corridors, alignments, and station locations will be identified. Sound Transit supports development in stations areas consistent with Sound Transit TOD policies.

designated regional growth centers and manufacturing industrial centers. The Long Range Plan should be updated to ensure planned HCT investments should connect dense, walkable, and compact urban centers and serve areas with existing high transit demands. Lastly, in the world of limited resources, the final fiscally constrained Long-Range Plan should only include HCT projects that Sound Transit believes would be in the realm of possibility to fund, construct, and operate in the foreseeable future.

Sound Transit should work with other agencies to improve system integration

We strongly believe that Sound Transit high-capacity transit service is only as strong as its connections to local bus and streetcar systems; therefore we recommend that Sound Transit adopt and retain policies that strengthen these connections and improve system integration.

In order to provide the most efficient and effective regional transit system, Sound Transit should work with all transit agencies within district boundaries to avoid redundant service and better integrate operations and transfer areas across agencies. This may also involve improving and aligning payment systems to ensure that riders can easily transfer between modes, and have adequate time to complete multi-stop trips on one fare. A low-income fare policy should be efficiently integrated with other transit providers in the region.

Specifically, Sound Transit should implement recommendations that come out of the Sound Transit - King County Metro joint Integration Report requested by King County Executive Dow Constantine in his Executive Order signed June 12, 2014.

We also support the following program elements listed in the Draft SEIS (Appendix A):

- Connections with Other Services and Facilities: Support high-capacity feeder services
- Connections with Other Services and Facilities: Better integrate transit transfer areas and operations
- Connections with Other Services and Facilities: Support multi-modal connections
- Connections with Other Services and Facilities: Provide improved system access
- Support BRT programs of other agencies, with goal of ITDP Bronze BRT standard Systemwide
- Complete a transit access study on SR 522 (improve access to transit)
- Improve feeder services (e.g., to Federal Way Transit Center from Auburn, Puyallup and nearby park-and-rides)
- Improve connections between HCT and regional centers
- Study integration of Swift with Link LRT to maximize the transportation benefit of both modes

Comments on specific stations, projects, and corridors

- We are pleased to see the infill South Graham Street station - a busy commercial junction with high ridership potential - in the list of representative projects and programs.
- To ensure adequate pedestrian and bicycle access to the new Northgate Link light rail station, Sound Transit should continue working with its partners to obtain adequate funding for the Northgate Pedestrian and Bicycle Bridge project, even if this means transferring funds presently committed to constructing structured parking.
- Eliminate regional bus service from Puyallup to DuPont via Cross Base highway. The Cross Base highway is not currently funded or likely to receive funding in the near future, and is fraught with myriad environmental impacts. Connecting two lower density communities using a non-existent roadway should not be included in Sound Transit's long range plan.

480-6

Additional text has been added to the Final SEIS acknowledging the June 12, 2014 Executive Order which was signed shortly after publication of the Draft SEIS. Sound Transit will continue working with King County Metro and other transit providers to develop and implement measures to effectively integrate transit services in the region.

480-7

As indicated in Appendix A of this Final SEIS, a non-motorized bridge between North Seattle Community College and Northgate Link Station is listed as a representative project for the Current Plan Alternative. As such, this project or one like it could potentially be implemented as part of a future system plan.

480-6

480-7

480-8

- Include expansion of Tacoma Link between Parkland and West Tacoma (Tacoma Community College). Connecting the university and major job and employment centers should be included. Partially captured in light rail expansion project #14.

Thank you for this opportunity to weigh in on the Long Range Plan's Draft SEIS. We look forward to working with you as the planning process continues.

Sincerely

Rich Stolz,
Executive Director
OneAmerica

Tim Gould,
Chair, WA Chapter Transportation & Land Use Committee
Sierra Club

Lisa Quinn
Executive Director
Feet First

Hilary Franz
Executive Director
Futurewise

Rebecca Saldana
Deputy Director
Puget Sound Sage

Rob Johnson
Executive Director
Transportation Choices Coalition

Barb Chamberlain
Executive Director
Washington Bikes

Elizabeth Kiker
Executive Director
Cascade Bicycle Club

480-8

A downtown Tacoma to Tacoma Community College light rail corridor has been added to the Potential Plan Modifications Alternative and studied to the same level of detail as other corridors in the Final SEIS. Please see Figure 2-9 in the Final SEIS for the location of Corridor 15.

University District Community Council
 4534 University Way N.E.
 Seattle, WA 98105

July 22, 2014

Sound Transit
 Attention: Karin Ertl, Long Range Plan Draft EIS
 Union Station
 401 So. Jackson St.
 Seattle, WA 98104

RE: Comment on draft Long Range Plan
 Draft EIS

Dear Planner Ertl:

Our review of the Draft Environmental Impact Statement ("DEIS") on the Long Range Plan produced these comments:

Ballard to UW HCT (Corridor G) ---

Page 2-18 of the DEIS identifies the proposed Ballard to University of Washington rail corridor as a tunnel along the entire route. The Executive Summary, p. 6, and other sections of the DEIS (e.g. p.2-6, Table 2-1) say "portions of these corridors could be constructed in tunnels." The DEIS must make it clear that any construction along North and N.E. 45th St. east of Stone Way No. shall be in tunnels, except perhaps the crossing of Interstate 5. North/Northeast 45th St. is the main east-west shopping street north of the Lake Washington Ship Canal through Wallingford and the University District between Stone Way No. and the U.W. Campus and it is one of the main crossings of Interstate 5. Its sixty foot width does not allow sufficient capacity for the 45' feet needed for High Capacity Transit or even 30' for exclusive streetcar usage.

During the University Community Urban Center planning almost fifteen years ago, Phil Thiel, professor emeritus of the UW School of Architecture, proposed a tunnel from I-5 to University Village underneath N.E. 45th St. diverting through traffic under the ridge. Traffic on the surface going through the University District would be those with business there or to the University Campus. He included with his submission a side cut view showing elevations and a cross cut view showing dimensions of the tunnel; it had lanes for both buses and cars. The neighborhood thought it was a good idea and the neighborhood representatives recommended that his drawings be attached to the neighborhood planning document as a long range vision. However, the City's officials, who directed the planning, opined that his proposal would be too expensive and decided that it was outside the range of the planning assignment.

564-1

This SEIS is a plan-level, rather than project-level EIS. Accordingly, the alternatives are defined and evaluated broadly. More detailed analysis of potential alignments and design options would be undertaken in the future for those projects that are implemented as part of a future system plan. Therefore, although the descriptions of potential rail corridors in the Final SEIS indicate that portions of these corridors could be constructed in tunnels, any final determinations of this sort would be carried out in future phases of project development.

564-1

564-2

Specific design measures to address safety and traffic flow would be identified in the future as Sound Transit implements funded projects and services.

Extension of South Lake Union Streetcar to Lake City Way ---

Page 2-11, Figure 2-11, Section 2.9.5 of the DEIS and Appendix K, Figure 2-11, each entitled Potential Plan Modifications – Streetcars, show an extension of the South Lake Union Tram (“SLUT”) along Eastlake Avenue, across the University Bridge, and continuing north through the Roosevelt Way/11th Avenue Corridor to N.E. 75th St. and then by way of Lake City Way N.E. to the northeast. The proposal is folly: the University District will have a subway to downtown; it has METRO bus service every ten minutes and most of that will go away if a streetcar comes; there’s no place in the street for the trolley tracks; the two planned stops between South Lake Union and N.E. 45th St. don’t serve Eastlake well; METRO bus service is closer to the University and the University District, can serve South Lake Union better, and can do it in less time; and a second University Bridge for the streetcar would be very expensive and take property in a narrow corridor next to college dorms. Years ago, the then Chair of the Seattle City Council Transportation Committee, Jan Drago held a one-person public meeting at University Heights Center for the Community to get public input on such a street car extension. After listening to an SDOT presentation, about thirty people from the public spoke. Some 20 (including representatives of the four community councils) opposed the idea; five more (from the business community and the UW) opposed paying any assessments for it; three had questions; and only two (both from downtown) were for it. Seattle City Councilmember Nick Licata prepared a memorandum opposing the concept; an engineering analysis estimated the cost at \$ 80 to \$ 100 million. Planning in the University District favors slimming key vehicular roadways to provide bicycle lanes. Setting aside lanes for bicycles effectively excludes street cars on the same arterials. Page 4-86, Section 4.2.4 states that the SLUT travels at an average speed of 5.3 mph --- slower than the current METRO buses and far slower than Sound Transit’s light rail line.

The DEIS needs to set higher standards for considering streetcar plans. Page 2-31 states that streetcars may be considered as an option if “... it operates primarily in its own right-of-way and meets the corridor capacity Plan.” Before investing any funds in streetcars, the planners need to show that it will not displace current bus service or if it does so, markedly improve transit service, that it will not impede traffic circulation in the area, and that it is worth the high cost. The DEIS acknowledges that streetcars take away 30’ of right of way (p. 2-2), displace buses and reduce flexibility in the use of streets, increase the potential for accidents with pedestrians or other vehicles, including buses, personal vehicles and bicycles (p. 4-143), restrict street crossings and affect emergency and incident response routes or times (p. 4-143), limit left turns (p. 4-26) remove parking on one or both sides of the street (p.4-37), and in the case of the proposed extension cross a liquefaction zone where an earthquake would make the line inoperative (p. 4-13).

Transit Oriented Development/public squares ---

The DEIS, p.4-116, defines “transit oriented development” in this manner:

“Transit-oriented development (TOD) is a land-development pattern that integrates transit and land use such that transit stations contribute to the vitality and

livability of surrounding neighborhoods while the land development patterns near transit stations maximize ridership on the system.”

With the U-District Station, Sound Transit staff took the stance that only mid-rise or higher structures qualify atop its underground stations. In contrast, HUD’s Urban Transit Administration has authorized parking lots, parks, and food service and public markets as valid uses over subways. The DEIS needs to make clear a public square also qualifies.

The DEIS acknowledges that the full build-out of its system will have impacts upon public parks and open space. The listing of potential mitigation measures, Section 4.11.5, p. 4-160 and 4-161, should include use of Sound Transit right-of-way and station surfaces. Sound Transit needs to take a broader perspective about mitigation: parks and squares need to be provided to maintain the quality of life in the communities where stations fundamentally alter the business district and adversely impact the neighborhood. With the U District Station, Sound Transit will be bringing an average of 24,000 riders per day through two portals within the length of a football field and it will induce METRO to re-orient its services to become feeders like guards in basketball to the big man in the center. Currently, north-south METRO buses run north/south on 15th Ave. N.E., the ‘Ave., and the Roosevelt Way corridor. Passengers board and alight at bus stops scattered along over half a mile on each street, and pick-ups and drop off can occur along the whole route. Sound Transit stations compress people together like a funnel. People react adversely when squeezed involuntarily, such as, in order to commute to work, having to go to subway stations, enter an enclosed underground space; and get jostled on a crowded rail car. Public plazas and open space can change the ambience so people are more accepting of the subway experience and the immediate neighborhood more accepting of the crowding by commuters.

Environmental Review ---

Page 2-33 and 2-34 declares that Sound Transit program includes a commitment to satisfying “..all applicable laws and regulations to mitigate significant adverse environmental impacts reasonably and responsibly.” The DEIS has to stipulate that Sound Transit’s commitment will be genuine, and not merely lip service as it was with the U District Station. Back in August 2012, the Sound Transit Board approved a conveyance to the University of Washington of the surface rights over the U District Station at a perfunctory hearing. It made no environmental analysis even though many citizens and community groups had proposed a public plaza on the surface and even shown a model at the public comment period. Sound Transit claimed that no environmental work was needed because the conveyance was exempt from the State Environmental Policy Act under the Washington Administrative Code (“WAC”); the WAC exempts a conveyance when it transfers title alone without affecting future use of the premises. In fact, Sound Transit agreed in the document (not then disclosed) to build an expensive sub-structure and large portal buildings. The sub-structure would support a high rise office and residential use up to six stories. The WAC stipulates that a conveyance is not exempt when it is linked to construction.

564-3

This plan-level SEIS addresses transit oriented development (TOD) at a programmatic and policy level (see Section 4.9 of the Final SEIS). The SEIS does not address the types of development that could be implemented. Specific proposals for transit oriented development at Sound Transit stations would be evaluated and negotiated on a case-by-case basis during implementation phases of project development. Transit oriented development associated with Sound Transit projects will be implemented in accordance with Sound Transit’s TOD Policy which can be found on Sound Transit’s web site at: <http://www.soundtransit.org/projects-and-plans/in-your-community/transit-oriented-development>

564-4

Sound Transit’s mission is to provide high capacity transit for the region. Where projects have impacts to parks and open space, mitigation specific to the impacts would be identified and developed during project-level implementation of the corridors included in the Long-Range Plan Update. Light rail stations are sized for the patronage and entry areas are open and provide clear visibility for users. Where site conditions allow widened sidewalks are provided.

564-5

Sound Transit has complied with all applicable environmental laws and regulations for implementation of the U District Station of the Northgate Link Extension project. Implementation of projects described in the Long-Range Plan would also meet applicable laws and regulations.

We thank you for the opportunity to comment and look forward to revisions in the final environmental impact statement on the plan in response to our letter.

Yours truly


Matt Fox
President

UPTOWN ALLIANCE
3227-13th Ave. W., Seattle WA 98119 206-283-2049

Joni Earle
 Sound Transit
 Union Station
 Seattle, WA

Uptown Alliance is the civic organization for the Uptown Urban Center. We are now in our 11th year of service to this urban center. UA is working with the City to develop an Urban Design Framework for Uptown with maximum public participation.

Some values UA is basing its UDF activities on:

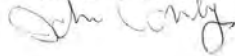
- Walkable, bikable, liveable urban center
- Mass transit services for Uptown residents, workers, and Seattle Center visitors.
- Reduce SOV traffic
- Pedestrian/bike safety
- Diverse-income population
- Sufficient future residential and job density to fulfill population and economic growth goals
- TOD and affordable housing

We encourage Sound Transit to develop light rail (LRT) service Downtown to Ballard that will include a below grade station in "Heart of Uptown" as defined in the adopted Uptown Neighborhood Design Guidelines.

We also extend a standing invitation for Sound Transit to make a presentation to our membership regarding LRT alternatives currently under consideration for the Downtown-Ballard Extension.

Sincerely,

John Coney, Co-Pres.



313-1

Please see the response to common comment 22 - Provide grade-separated transit in Section 5.3.4 of Chapter 5 of this Final SEIS.

Sound Transit will determine the profile of transit facilities during project-level reviews based on criteria that consider (1) topography, (2) physical barriers, (3) available surface right-of-way, (4) operating needs, (5) development density, and (6) cost.

313-1

Sound Transit Long-Range Plan Update - RECORD #529 DETAIL**Submission Date :** 7/24/2014**First Name :** John**Last Name :** Coney**Submission Content :** Uptown Alliance and other Uptown stakeholders are in the process of developing an Urban Design Framework for Uptown Urban Center with Seattle DPD and other City departments.

High Capacity transit desire lines that are largely unfulfilled have been noted in the UDF Charettes:

- Uptown-SLU-Capitol Hill LRT station.
- SODO-Downtown-Belltown-Uptown-Fremont(?), Ballard.

John Coney, Co-Pres. Uptown Alliance 283-2049

529-1

The Potential Plan Modifications Alternative (see Figure 2-9 in the Final SEIS) includes high-capacity transit corridor 25 - West Seattle to Ballard via Central District, Queen Anne which in conjunction with the First Hill Streetcar could provide these connections. However, this SEIS is a plan-level rather than a project-level EIS. Accordingly alternatives are defined and evaluated at a high level and specific alignments have not been identified. More analysis of particular corridors may occur during the system planning process. For those corridors that are implemented as part of a future system plan, more detailed analysis of particular alignments and station locations will occur during project development. During project development the public will have additional opportunities to review and comment on the project, including alignments and station locations.

Sound Transit Long-Range Plan Update - RECORD #414 DETAIL**Submission Date :** 7/28/2014**First Name :** John**Last Name :** Coney**Submission Content :** The Uptown Urban Center Urban Design Framework process is underway.

One of the major themes emerging in this community-wide discussion is the need to have high capacity transit connecting the Uptown, Seattle Center, SLU, and Capitol Hill Urban Centers.

Please consider a study to determine feasible east/west HCT routes and modes.

John Coney, Co-Pres. Uptown Urban Center Alliance 206-283-2049

414-1

The Potential Plan Modifications Alternative (see Figure 2-9 in the Final SEIS) includes high-capacity transit corridor 25 - West Seattle to Ballard via Central District, Queen Anne as well as corridor 8 - Downtown Seattle along Madison Street which could provide connections between Queen Anne, Rainier, and First Hill.

All of the corridors studied in the Final SEIS are intended to reflect a general area within which high-capacity transit could be implemented. The current Long-Range Plan explicitly states that "the lines on the map representing future service investments are intended to show general corridors that would be served, and do not represent specific routings or alignments." Specific alignments will not be identified in the updated Long-Range Plan. For those corridors that are ultimately funded and implemented, more detailed project-level reviews will occur in the future including a more in-depth alternatives analysis that evaluates various alignment options. At that time, the public will have additional opportunities to review and comment on those alignment