

02/25/2021 Board of Directors Meeting
Public Comment Submissions

Submissions

Disability Mobility Initiative/Disability Rights WA, Downtown on the Go, Transportation Choices Coalition, Cascade Bicycle Club, Seattle Subway, Transit Riders Union, Greater Redmond Transportation Management Association, OneAmerica, and Futurewise 2

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Disability Mobility Initiative/Disability Rights WA, Downtown on the Go, Transportation Choices Coalition, Cascade Bicycle Club, Seattle Subway, Transit Riders Union, Greater Redmond Transportation Management Association, OneAmerica, and Futurewise

**** The contents of this message are primarily via attached letters, which have been included below.**

Dear Sound Transit Board and Leadership,

Thank you for the opportunity to weigh in on the program realignment process. We are dedicated to helping Sound Transit deliver on the promise of a robust and equitable transit system.

Our organizations, together Transit Access Stakeholders, have previously submitted comments regarding the program realignment process as it aligns with our values (May 2020 letter attached), and offer the following subsequent comments (Feb 2021 letter attached) based on the additional information available at this time.

Thank you for your hard work and care in these challenging deliberations and decisions.

Best,

Hester Serebrin (she/her)
Policy Director

Transportation Choices
1402 3rd Ave #310
Seattle, WA 98101

Joyce Hengesbach

Thank you for the time, energy, and money you continue to invest in building a robust and much needed regional transit system. We understand the pressures brought by decreased revenues and escalating costs.

The West Seattle peninsula urgently needs a grade separated connection to the Sound Transit network. Residents of West Seattle are concerned about potential delays and postponements of light rail. In the meantime, Metro buses will be the primary means of accessing the network. Buses are not as dependable as we would like them to be as they travel on increasingly congested roadways and bridges. As West Seattle continues to grow, more buses will be required adding to the congestion, the wear and

tear on roads and bridges, and the emission of carbon and particulate matter into the atmosphere. And it will also strain Metro finances.

An elegant solution: A gondola that connects West Seattle to the Sound Transit network.

A gondola could be operational in less than 5 years allowing Sound Transit to collect fares significantly earlier. Construction cost would be a fraction of the budget for the West Seattle light rail extension. Gondola systems are less expensive to operate and maintain than light rail systems or buses and do not require an offsite OFM. As a rough comparison: For a planned aerial transit system in Burnaby, BC, a 2011 Business Case Study estimated that a gondola is half as costly to operate as buses. To reduce complexity for Sound Transit, operations could even be outsourced to the manufacturer.

Because of its exclusive pathway, more direct routing and continuous boarding, a gondola would provide passengers with a dependable, one-seat ride to the SODO or International District station, even in snowy and icy conditions. It offers a quiet, safe ride in cozy, comfortable cabins with beautiful views. The gondola's predictability, convenience, and enjoyability may entice more drivers out of their vehicles and attract non-commuters and tourists. This could benefit businesses in West Seattle, SODO, and the International District and would allow Sound Transit to collect more fares, years sooner.

We understand the immense challenges you face in delivering a regional system under current circumstances. As you consider realignment options, we encourage you to explore what a gondola system could offer to both Sound Transit and riders.

Sincerely,

Joyce Hengesbach on behalf of West Seattle SkyLink

West Seattle SkyLink
www.westseattleskylink.org

Ab Juaner

Dear Sound Transit Board of Directors,

I am writing to you to express Puget Sound Sage's strong support for the surplus property transfer to Seattle Office of Housing at no cost for affordable homeownership development (Motion No. M2021-08).

As we make deeper investments in expanding the regional transit system, we must make sure that we are prioritizing Equitable Transit-Oriented Development. We want Sound Transit to affirm its equitable policies and create processes that center the needs of those who are most impacted by displacement. We want to see an increase in Community Stewardship of Land in Seattle and King County through equitable TOD policies that advance community control of land and equitable development.

The COVID-19 pandemic has exacerbated the existing structural inequities that burden BIPOC and low-income workers and families. As we continue to grapple with the immediate and long-term effects of the public health and ensuing economic crisis, Puget Sound Sage continues to fight for an economic recovery that shifts assets and power into the hands of BIPOC and low-income communities. One of our priorities to transition to a living economy is to move land into community control and permanent affordability.

Please read the rest of our blog post from yesterday. In there we explained why Community Stewardship of Land is the core strategy in preventing displacement and how resources such as surplus properties can be leveraged to support Equitable TOD.

[Let's Move Surplus Property into Community Stewardship](#)

Thank you,

Ab Juaner

Abdi Yussuf

My name is Abdi Yussuf, I am with Puget Sound Sage and the South Communities Organizing for Racial and Regional Equity. We express our support for the transfer of the Sound Transit surplus properties in the Rainier Valley to the Seattle Office of Housing at no cost for affordable homeownership development.

Together with South CORE and other transit advocates, we have envisioned community controlled and inspired development for the Rainier Valley. In 2019, we engaged our South CORE partners to imagine what equitable transit-oriented development and inclusive community engagement would look like for these properties. We know that BIPOC and low-income communities are transit-dependent while at the same time are constantly at risk of displacement and they often do not get to reap the benefits of new public infrastructure investments. So, government agencies must ensure that these communities lead the visioning and development of these properties.

We believe that a transparent, equitable, and community-led engagement process will ensure these sites will be owned, developed, and stewarded by the community.

As we continue to invest in expanding regional transit, we want to see Sound Transit commit to implementing equitable policies and processes that center the needs of those who are most impacted by displacement.

We want to see more Community Stewardship of Land in Seattle and King County through equitable TOD. We hope that you approve the no-cost transfer of the Sound Transit surplus properties to the Seattle Office of Housing for affordable homeownership in the Rainier Valley.

Thank you.
Abdi Yussuf,

Transit Access Stakeholders

Dear Sound Transit Board and Leadership,

Thank you for the opportunity to weigh in on the program realignment process. We are dedicated to helping Sound Transit deliver on the promise of a robust and equitable transit system. Transit Access Stakeholders have previously submitted comments regarding the program realignment process as it aligns with our values (attached), and look forward to further engagement.

As the board prepares to consider scenarios based on the adopted criteria, we now offer additional comments on both the process and goals:

Clarify the timeline for decision points. There is urgent work to secure federal help and determine budgets for upcoming projects. However, we should be diligent in understanding impacts of the decision sequencing and not rush without better understanding of timing.

- **Ask:** Provide a more detailed timeline to understand what decisions must be made when. What must be decided by July? In 1, 3, 5 years? How does each decision influence and affect the others? When will additional design information be made available? This information can inform how decisions may be smartly staggered as revenue projections change.

Serve the region. The future Sound Transit connects people and cities all across the Puget Sound region. While everyone will feel the impacts of realignment, we must use a regional, criteria-based approach rather than project-by-project political fights.

- **Ask:** Use criteria as much as possible to make data- and values-based decisions.

Incorporate equity throughout the process. Equity is both a process to engage those historically marginalized, and an outcome to ensure maximum benefits to these populations, and the reduction and mitigation of harm and disparity. Transit can be used to improve mobility options where gaps and disparities exist, but must mitigate the potentially negative impacts of construction, ROW acquisition, and gentrification. At the same time, COVID reshaped our systems, our economy, and highlighted the most essential riders and trips, and we must incorporate those lessons into future planning.

- **Ask:** Bring new COVID ridership data to the table for all realignment discussions.
- **Ask:** Engage BIPOC, low-income, and disabled riders and future riders to understand realignment priorities and tradeoffs.
- **Ask:** Keep refining criteria for equity that accounts for impacts and access needs.
- **Ask:** Bring equity definitions, maps, and scenarios to the community to improve and iterate on these measures.
- **Ask:** Use a Racial Equity Toolkit to evaluate your process and proposals

Consider additional scenarios. In addition to the adopted policy criteria, we should explore developing scenarios that look at other external factors. For instance, what would a “get more federal funding” scenario look like, compared to a “construction costs continue to rise” scenario, or other financial scenarios that could have different impacts of the program.

Transit Access Stakeholders

- **Ask:** Add and/or layering on financial scenarios to policy scenarios to understand approaches on delay, borrowing, etc.

Prioritize access. Getting people to the system is the first step to getting them on the system, and we should optimize for reducing barriers and increasing access in the built environment surrounding the stations as well as the stations themselves.

- **Ask:** Ensure access funds, local integration, vertical conveyances and TOD are treated as core and critical components of each project and alignment.
- **Ask:** Don't cut stations or access projects, delay where possible.

Be flexible. While the financial impacts are challenging, realignment poses an opportunity to ensure we are building a system responsive to climate change, COVID, and our current racial reckoning.

- **Ask:** Consider where local jurisdictions can “borrow against” larger investments to get quickly implemented bus, biking, and walking options to improve mobility in the short-term. For example, could a jurisdiction agree to push out the timeline of their larger capital project and in return receive funds to build out quicker and more flexible projects that improve access and mobility in the meantime while helping with cash flow issues.
- **Ask:** Update the system access policy to ensure jurisdictions get promised financial investments that can meet access intent while updating to reflect changing conditions.

There are difficult choices ahead as we work to build out the light rail system the people of the Puget Sound are counting on. If we make the right decisions at the right time, stay focused on the region, build equity into process and outcomes, stay flexible and creative, and make sure we prioritize access we will face these challenges pointed in the right direction. Doing so will ensure the overall health of our people, economy, and planet.

Sincerely,

Disability Mobility Initiative/Disability Rights WA
Downtown: On the Go!
Transportation Choices Coalition
Cascade Bicycle Club
Seattle Subway
Transit Riders Union
Greater Redmond Transportation Management Association
OneAmerica
Futurewise

Date: May 26, 2020

To: Sound Transit Board and Leadership

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

Re: Program Realignment

Dear Sound Transit Board and Leadership,

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

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

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

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

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

Improve Community Engagement

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

What does this principle mean for program realignment?

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

Use a Race and Social Justice Lens in Decision Making

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

What does this principle mean for program realignment?

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

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

Prioritize Multimodal Access, Mobility, and Integration

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

What does this principle mean for program realignment?

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

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

- Parking is expensive, creates safety and air quality issues, reduces opportunities for affordable housing and good TOD, and disproportionately benefits white people and higher-income populations: people with low-incomes and people of color in Washington are still much less likely to own a car.
- Plan for and build less parking for each project
- For those for whom driving to a station is their only option, focus on ADA and ORCA LIFT parking.
- Price and manage parking at all current and future park-and-ride lots.

What does this principle mean for program realignment?

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

Maximize Ridership with Potential for Equitable TOD and Density

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

Prioritize Affordable Housing in Development Decisions

- Sound Transit should prioritize affordable housing and other equitable development in the use and disposal of its land.
- Aligning land disposition/acquisition policies and affordable housing goals provides local flexibility, creates government efficiencies, and puts public property to its highest and best use.
- Engage community members early in TOD and land use planning process.

Minimize and Fight Displacement

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

What do these principles mean for program realignment?

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

Maximize Reliability

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

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

Plan for the Future

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

What does this principle mean for program realignment?

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