

250410 System Expansion Committee

Meeting Written Public Comment

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Fernando Robles Munoz

Sound Transit Board Meeting Comments,

Dear Sound Transit Board Members,

Sound Transit must build Ballard Link Extension stations under 4th Ave in CID, at Madison Street in Midtown, and at 7th and Harrison in SLU. We are writing to you today to urge you to put an end to the plan to start over on the Ballard to Downtown Environmental Impact Statement (EIS) that requires over \$100 million extra in direct costs, adds two years of delay in planning work, and increases the likelihood of future delays in opening the project.

The voters approved major expansion in 2016, and expect you to deliver it. Since then, we have participated in years of process and community engagement which produced the options already available to the board. Do we really have to wait even longer to finally ride a system we are paying for? It's time for the Sound Transit Board to choose from the existing Ballard Link Extension options.

Stopping the new EIS means stopping the deletion of three of the highest ridership stations in the system: Chinatown International District, Midtown, and South Lake Union Stations. Stopping the new EIS means maintaining the high ridership system this entire region voted for in 2016.

A new EIS will take years to complete and is likely to waste of hundreds of millions of dollars in direct and indirect costs, when all is said and done. All in the interest of putting forth worse options that fewer people will use. More self-inflicted delays are unacceptable on their own, but these are costly self-inflicted delays with an end goal of justifying bad decisions.

Do not permanently destroy our transit system out of short sighted priorities. Stop wasting time and money on endless process, choose existing options, and stop the new EIS before it starts.

Sincerely,

Fernando Robles Munoz

Jake Larson

Sound Transit Board Meeting Comments,

I'm writing to you today to ask that your decisions keep promises that Sound Transit 3 made to the region's voters in 2016. Sound Transit 3 was approved by nearly 70% of Seattle voters and 58% of King County voters, promised to expand the existing multimodal transit hub in the Chinatown/International District (CID) with a second Link station, and promised to add a new Midtown station, serving First Hill. It is vital that the Sound Transit Board follow through on the voter-approved plan. A late-breaking alternative proposal intends to squander the potential of a world-class transit hub near Union Station and — once again — skip First Hill entirely. Do not let it succeed.

So much transit connectivity is contingent on having the Ballard-to-Tacoma line connect directly with the existing CID Station along with the Sounder, Amtrak station, regional buses, and the streetcar line next door. With the 4th Avenue in CID alternative being built, CID is the most important hub in the Sound Transit 3 network, which is projected to carry 600,000 daily riders by the 2040s.

Sound Transit is building a second downtown Seattle light rail tunnel because the existing tunnel can't handle all the traffic that three light rail lines would entail. Adding the second tunnel also allows the agency to add a station at Midtown, on the edge of First Hill with a high quality connection via the RapidRide G Line set to open bus rapid transit service in 2024. This Midtown Station is projected to attract more than 15,000 daily riders which would be the most of any non-hub station in Sound Transit 3.

A coalition has emerged behind a “North of CID and South of CID” option that pairs a Pioneer Square / Jail Station with another station that is a five-minute walk south of Uwajimaya Asian Market. These stations are not in CID. The “South of CID” station might be better described as “Freeway Interchange Station” being hemmed in by I-90 to the south, I-5 to the east, and a highway-like section of 4th Avenue and a BNSF rail yard to the west. The opposition to 4th Avenue in CID argues that the Freeway Interchange Station and the Pioneer Square Jail Station would provide comparable transit service. But for future light rail riders, that is patently false. Here’s why transit would be worse under the “North of CID and South of CID” alternative:

1. Breaking the CID’s direct light rail connection to the South End is a big deal. People in the South End would have a worse connection to the CID than they have now because their trains would no longer go to Chinatown Station, but instead to Jail Station or Freeway Interchange Station. Because Asian communities are increasingly spread out across the region, that connection is vital for the CID to play the role of the cultural hub of the community in a future that will be more transit-dependent and less auto-dependent. Likewise for people living in the CID a hub station provides a link to relatives and friends living elsewhere and to the airport. The lack of a high quality transfer at CID Station would mean significant delays in the 10-minute range for many trips (e.g. Rainier Beach to CID). Transportation departments would never tolerate such delays if planning car infrastructure.

2. A good anti-displacement strategy is key and will allow additional light rail to be additive rather than destructive to Chinatown and the CID community. The opposition to the transit hub in CID makes counterfactual assertions that “displacement” would be a non-issue having two lines in a neighborhood, plus another next door, yet three lines in a neighborhood equates to total neighborhood displacement. Most of the low-income residents in the CID already live in affordable housing that is rent-restricted and the neighborhood has special affordable housing development providers, and a special development review board that has the ability to greatly limit real estate speculation within the CID. Lots of housing is going in as is, but a large chunk of it is affordable.

3. Stopping cultural displacement in the CID is going to take multiple strategies and blocking a light rail station could backfire. Commercial rent control, affordable housing investments, residential rent stabilization, and support for culturally-relevant small businesses and entrepreneurs seems key to an anti-gentrification strategy rather than hampering transit access. Good transit access and a bustling transit hub at the heart of the neighborhood is only going to help CID small businesses thrive. We urge the board to support a robust mitigation strategy and ensure small businesses and residents weather the disruption of station construction.

4. The duration of construction and engineering risk with 4th Avenue S is a tradeoff, but also provides an opportunity to upgrade all of the aging and deteriorating bridges and viaducts in the area in one fell swoop. For instance, the 2nd Avenue S Extension bridge is rated poor and is going to need to be replaced soon, which will impact the 4th Avenue S and S Jackson Street intersection since it’s structurally integrated into it. Avoiding a station at 4th Avenue S does not avoid interruptions caused by such needed bridge rebuilds. Bundling these projects together minimizes overall construction impacts and also provides an opportunity to redesign the unsafe mini-surface highway that is 4th Avenue S.

5. Equitable transit-oriented development (eTOD) opportunities exist with the County Campus and County-leased Salvation Army site whether or not light rail is placed directly on them. The County campus is already next door to Pioneer Square Station. The County should use its campus to add mixed-income housing despite it being bad for light rail. The “South of CID” site is bad for housing since it’s sandwiched against the enormous I-90/I-5 interchange with no walkshed to the west, south, or east. Buying this property at great cost would be great for the wealthy, well-connected developer who currently owns it, but is a bad move for the County and Sound Transit. It appears these two sites are proposed because they are convenient for the County to offload, not because they make sense for transit or provide new TOD opportunities that wouldn’t already exist.

Over 4,000 individuals and organizations have already called for Sound Transit Board action to: build the 4th Avenue CID station, fulfilling its potential as the site of a truly world-class multi-modal transit hub; and build Midtown station (see: change.org/moveforwardon4th). To our elected

representatives on the Sound Transit Board, please build the 4th Avenue station in the CID that will best serve decades of transit riders from across the Puget Sound region, and please build the Midtown Station that will best connect First Hill and serve 15,000 daily riders.

Sound Transit Board Meeting Comments,

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Do not permanently destroy our transit system out of short sighted priorities. Stop wasting time and money on endless process, choose existing options, and stop the new EIS before it starts.

Sincerely,

Jake Larson

Life-long Puget Sound Resident

Jake Larson

Donna Popich

Dear ST Board Members,

Vote NO on Resolution No. R2025-10: DO NOT ADVANCE WSLE TO FINAL DESIGN PHASE!

In addition, please don't be responsible for forcing my great, great grandkids to pay for ST3!

I am a long time West Seattle resident and a smarter transit advocate. Our community is now keenly aware of the vast number of issues with ST3, which you, the Board, have seemingly worked so hard over the years to cover up, often with your glitzy promotional initiatives. The majority of our WS Community believes that the West Seattle Light Rail Stub is an ill-conceived, ill-fated, and ridiculously costly and wasteful megaproject.

The WS Community is also aware of the fact that no feasibility, financial, and/or environmental studies were done before this project was put before the voters in 2016. The ridiculous cost for this four miles of track built on a never-built-before transit bridge over a fault and supported by fill dirt also seems doomed to the same fate as the failed WS Bridge.

The cost of ST3 is currently at an insane 7 billion dollars (we voted for 1.6 billion), and no one signed up for the environmental damage that cannot be mitigated or the forced sale of property and businesses at

bargain basement prices that will compel residents to leave this area and force business owners to close their doors.

I can say unequivocally that not one member of this ST Board has listened to the public outcry against Sound Transit or paid heed to any of the public's well-researched suggestions for smarter transit alternatives!

I do not want my great, great grandkids saddled with the continuous responsibility of paying for ST megaprojects 75 years from now if Senate Bill 5801 passes.

donna popich

William Terrance

Hi,

I wanted to comment on the In Fill stations for the 1-Line at Graham St and Boeing Access Rd. I am against both of these but not in principal, just as what I currently understand as the concept.

My opposition to the Graham station is largely connected to the issue of at-grade train transportation in general. There are issues on Martin Luther King Jr Way S in the current station locations and adding another isn't likely to improve the issue. There is also added danger with more starting and stopping of a train where it is able to make contact with people walking, biking and driving. I would ask the board to consider creating a grade separated option as a way to move toward the entirety of the MLK portion becoming grade separated.

The Boeing Access Rd station is a different issue, initially I thought this was a wonderful idea. However, at the time I had made the naive assumption this station would include a station and connection for the Sounder S-Line running perpendicular to the light rail tracks in the area. It is my understanding this connection is not an option, and this is sad. If there is no option for this connection I would suggest investigating moving the station 2 miles SSE near Tukwila Park & Ride adjacent to Interurban Ave S where the I-5 and SR 599 converge. This location is near an industrial park, an area with increasing medical appointments and would connect to the aforementioned park & ride which could use an update. It even comes with a cooler name "Foster Station" which highlights an historic area which is almost forgotten.

Sincerely,

William Terrance

Terry Scidmore

Please do not vote for Resolution No. R2025-10. I fail to see how the WSLE makes any sense on any level, nor is it financially feasible.

Terry Scidmore

Betty Lau

**Public Comment by Betty Lau, Sound Transit System Expansion
Committee Meeting, Thursday, 4/10/25, 1:30 p.m. at Union Station**

I'm Betty Lau of Transit Equity for All and board member of the Chong Wa Benevolent Association.

On March 27, I was glad to hear Board member Mayor Franklin speak of “completing the spine” and heralding “transparency and accountability.”

CID seniors filled this room to support the station that gives us the most accessibility and connectivity: 4th Avenue.

But things are not adding up here.

1. The Sound Transit VMS consultant says to collaborate and work with the railroads early (Los Angeles, Boston, Chicago are examples cited) but there's another that says it's too hard.
2. There's a VMS consultant report that says N of CID station is not the best choice, that it's only 2nd best.
3. The same report says S of CID station doesn't connect to anything so he doesn't understand why it's being considered, other than it's easy to build.

Yet there's a so-called independent report that is so against the voter approved 4th Avenue station that one has to wonder why brilliant engineers and leadership didn't disclose it in the 2022 DEIS when Sound Transit said we had a choice of 4th or 5th and community and the public chose 4th.

The VMS report was hidden from us for a year (written 11/14/2023, published online 11/7/2024) as we pleaded for information during two years of delay!

Please do the right thing and keep the promise of racial, social and economic benefits from light rail for the CID and the Region!

Thank you

Source: Sound Transit 4th Avenue Shallow Schedule Analysis Study Report by Value Management Strategies, Inc., 11/17/23; posted online to ST Website 11/7/24

Katrina Hoch

Hi,

I'm a Seattle resident and submitting comments related to the CID lightrail stop on the new line from Ballard to West Seattle. Please find my comments attached.

Katrina

Katrina Hoch, PhD, MS, RD

Marilyn Kennell

Vote NO on Resolution No. R2025-10. DO NOT ADVANCE WSLE TO FINAL DESIGN PHASE.

Marilyn Kennell

West Seattle

Kirsten Whittemore

Vote NO on Resolution No. R2025-10: DO NOT ADVANCE WSLE TO FINAL DESIGN PHASE!

Signed –

Kirsten Whittemore

4th generation West Seattle resident

Jack Whisner

ST Boardmembers,

Please table resolution 2025-10 indefinitely. Please wait until you know more about the cost and feasibility of the Ballard Link Extension and the overall fiscal situation of ST3. The ST3 plan is to open the West Seattle line as a shuttle to SODO only. This is silly on its face. There should be no hurry to design and build a silly project with poor timing and very high cost. Please use your planning and engineering resources better. There are transit improvements that would help the corridor in the meantime.

Here's one. Use the DSTT more intensively. Operate a turnback Link train from the South Forest Street base; the first station served would be SODO. Suggest to Metro that its non Rapid Ride routes of West Seattle meet Link at the SODO station via the South Lander Street overcrossing that SDOT opened in 2020. Feed Link!

Thank you for considering this note.

Jack Whisner

PCO 36-2168

Martin Westerman

Note: This comment includes an attachment which can be found at the end of this document.

Greetings Board,

The only way light rail works, is if it links population and transit nodes, with centers of commerce and employment. It's a linear, spoke to hub arrangement. If those centers are spread out, a more flexible, diversified transit system is required. That is why you must reconsider the WSLE plan, and vote NO on Resolution No. R2025-10. You must refuse to advance WSLE to final design phase.

The FTA has not even issued a record of decision, and your rush into this resolution simply makes you all look desperate.

To build West Seattle light rail, we have to be betting on a future where Downtown is the biggest commercial and employment draw, a large number of West Seattle's residents are housed in residential and commercial buildings around light rail stations in Delridge, Avalon, and the Alaska Junction, and Metro Transit has cancelled all its WS-downtown bus service. It's the only way light rail can efficiently carry people along that corridor.

Even so, if the future Seattle looks less like NYC, Philly, or Chicago, and more like SF and LA with diversified centers of commerce and employment, light rail is the wrong choice. We'll need more flexible transit options, not fixed, linear ones.

Boeing for example, employs thousands of people in Georgetown, Everett, and Kent, but nobody takes the bus or light rail to work there, because nobody lives anywhere near those facilities. They all take personal or shared vehicles, or Boeing transport. It wouldn't be economical — even with billions in what ST board members consider “public money that grows on trees” (aka your constituents' tax dollars) — to build fabulously expensive transit links to those factories. Starbucks, Amazon, and Microsoft know that, and run their own employee buses through West Seattle.

A WS-downtown rail line won't change that. It will be designed only to serve downtown Seattle, not the Port or the SODO industrial area, not Starbucks, not the CID. Does building a fixed, inefficient rail transit line make it worth trashing the CID, disrupting the revenue-producing port & industrial area, trashing central, eastern West Seattle, erasing acres of forest, doing irreparable environmental harm, and losing commercial businesses, and jobs?

Our own PSRC says of all trips in the four county area by 2050, light rail will only carry 3%, buses 5%, and the combination about 15% in the Seattle area. The remaining 85%-92% of trips will be carried by personal and shared vehicles. Bottom line: we are better served approaching transit with buses and other flexible transit modes, than by inflexible, linear rail.

VOTE NO on Resolution 2025-10.

Martin Westerman & Transit Colleagues

Brien Chow

Public Comment by Brien Chow at Sound Transit Board Meeting, Thursday, 4/10/25 at Union Station

I'm Brien Chow, Co-Founder Transit Equity for All and Chong Wa Benevolent Association for the state of Washington.

The 4th Avenue Regional Station represents a historic opportunity to revolutionize Seattle's transit infrastructure.

You... the Board... recognizes that station selection for the CID segment should be one that will enhance the regional light rail network for the next 200 years.

Mayor Bruce Harrell says, "...it is a once-in-a-generation investment in our future."

I'm speaking of the 4th Avenue alignment which minimizes community disruption...

displaces zero residents and small businesses...

while connecting a community of color to the entire system.

In contrast, the South of CID alternative is useless.

Consultant VMS states in the "4th Avenue Shallow Alignment – Schedule Analysis Study":

"The South of CID alternative does not provide good connectivity between the light rail lines... to the heavy rail corridor..."

or to a major employment center. It is unclear what the advantage of this location is from a utility standpoint."

And that North of CID station is not the best choice.

Only 4th Avenue connects all 3 lines for maximum connections and accessibility.

Move Forward on 4th

Written Public Comment by Brien Chow at Sound Transit Board Meeting, Thursday, 4/10/25 at Union Station

I'm Brien Chow, Co-Founder Transit Equity for All and Chong Wa Benevolent Association for the state of Washington.

The Urgent Case for the 4th Avenue Regional Station: A Bold Investment for Seattle's Future

The 4th Avenue station is the **most critical and transformative choice** for Seattle's transit expansion. Its alignment ensures **unparalleled connectivity**, linking light rail lines, heavy rail corridors, and major employment hubs. This infrastructure will **enhance regional mobility**, empower economic growth, and provide equitable access to housing, jobs, and essential destinations.

Mayor Bruce Harrell described Sound Transit as a **"once-in-a-generation investment in our future."** He stressed the urgency of delivering this transformative project swiftly, as it is key to building a **more connected and sustainable region**. The "4th Avenue Shallow Alignment – Schedule Analysis Study" further solidifies its viability, highlighting actionable measures to streamline construction while **minimizing community impacts**.

Why North and South CID Alternatives Fall Short

The North and South CID alternatives present **critical weaknesses**. As the study asserts, **"The South of CID alternative does not provide good connectivity between the light rail lines, to the heavy rail corridor, or to a major employment center. It is unclear what the advantage of this location is from a utility standpoint."** These options fail to deliver the integration and effectiveness that a regional transit solution demands.

A Call to Action

The 4th Avenue alignment is **not just an option—it's a necessity**. It ensures a **connected, accessible, and sustainable transit system** that will serve the region for the next 200 years. The time to act is now delivering this transformative project is essential to meet Seattle's vision of equitable and robust development. Let's secure a stronger, smarter future with the 4th Avenue station.

Robert M Williams

Note: This comment includes an attachment which can be found at the end of this document.

Thank you attached please find the in person public comment I will make tomorrow.

Best Regards,

Robert M Williams

Regional Manager - Planning and Community Development



Rainier Valley Community Development Fund

6951 Martin Luther King Jr. Way South | Suite 225 | Seattle, WA 98118

Direct: 206.722.4001 | Cell: 206.276.0403

www.rvcdf.org

Rainier Valley Community Development Fund acknowledges that we are on the traditional land of the first people of Seattle, the Duwamish People past and present and honor with gratitude the land itself and the Duwamish Tribe.

MaryKate Ryan

Dear Sound Transit Board,

In 2022, the comment period for the West Seattle Ballard Link Extension DEIS was extended to 90 days to recognize the complexity of this project but also the challenges of engaging some sectors of Seattle's communities.

Today, we are asking the Board to advocate for *at least* a 90-day comment period for the forthcoming Ballard Link Extension DEIS. Additionally, we ask that translated materials be provided at the outset of this comment period, along with resources for language access throughout the process.

Thank you for your time,

MaryKate W. Ryan (all pronouns)

Preservation Planner

historicsouthdowntown.org

603.219.4081

Mailing address change:

Hing Hay Coworks, 409 Maynard Ave S

PMB 103, Seattle, WA 98104*

**Note address change as of Jan 2025*

Candace Shattuck

M 2025-17

Please vote no on this highly premature expenditure.

**Vote NO on Resolution No. R2025-10: DO NOT ADVANCE WSLE TO FINAL DESIGN PHASE!
NOT JUSTIFIED AT THIS TIME.**

CANDACE SHATTUCK

Sent from my iPad

It's only by kindness

and only for kindness

and only with kindness

that we can endure.

-Tolstoy

Jan Roberts

You must refuse to advance WSLE to final design phase. I use and support BRT. There has to be another way.

Jan Roberts

West Seattle

Comments received after the meeting's deadline

Marilyn Kennell

WHY DOES SOUND TRANSIT'S BRAD OWEN GET TIME AND WE DO NOT???? HIS PRESENTATION IS NOT ACCURATE. THE ONLY TIME CHAIR BALDUCCI HAS ASKED FOLLOW-UP QUESTIONS OR FOR A DISCUSSION AT THESE MEETINGS IS WHEN IT **PROMOTES** ST WSLE LIGHT RAIL. WHY DOES CHAIR BALDUCCI NOT WANT TO HEAR MORE ABOUT THE HUNDREDS OF HOMES, BUSINESSES, AND JOBS THAT WILL BE LOST IN WEST SEATTLE? WHY IS THE BOARD NOT CONCERNED ABOUT DESTROYING ACRES OF OUR REGIONAL URBAN CANOPY? OUR FORMER CHAIR CONSTANTINE AND KING COUNTY EXECUTIVE SAID (2022) "CLIMATE CHANGE IS THE GREATEST THREAT TO ALL WHO BEINGS WHO CALL KING COUNTY HOME". WEST SEATTLE HAS REQUESTED IN PERSON AND ON THE WRITTEN RECORD FOR TOWN HALL FOR OVER THREE YEARS NOW! OUR REGIONAL TRANSIT EXPERTS HAVE WRITTEN A FINAL EIS THAT YOU HAVE IGNORED. ST WSLE DEIS AND FEIS COMBINED CONTAIN 2500 PAGES; OUR EIS-C IS 21 PAGES. HAVE ANY OF YOU READ ANY OF THESE ENVIRONMENTAL STATEMENTS? WE AGAIN ASK TO PRESENT OUR EIS TO THE BOARD. HOW CAN ANY OF YOU IN GOOD CONSCIENCE RUBBER STAMP WSLE? OUR HUMAN AND NATURAL HABIT WILL BE RUINED BY THIS BLOATED BOONDOGGLE. PLEASE WORK ON THE SPINE, VOTE FOR A NO BUILD FOR WEST SEATTLE AND SAVE YOUR INTEGRITY AND YOUR TAXPAYERS \$7 BILLION!!!!

MARILYN KENNEL

WEST SEATTLE

West Seattle Light Rail Environmental Impact Statement-Conclusion (EIS-C)
Citizen Comment for Entry into the WSLE Record of Decision
With FTA Response Respectfully Requested

An independent assessment of the environmental impact
of the Sound Transit West Seattle-Link Extension (WSLE) light rail proposal
Submitted by Rethink The Link (RTTL) and Regional Transit Colleagues
Revision 5.1 November 14, 2024 | Replaces earlier versions
Hot linked documents should be considered as attached to this document.
Comments or Questions? Contact RTTL at contact@rethinkthelink.org

Section 1: Executive Summary

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

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

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

- the simple criteria outlined in ST3 would be satisfied, and
- WSBLE's proposed advantages would outweigh its disadvantages.

In the 2016 ST3 package, and the 2022 Draft EIS, the West Seattle and Ballard light rail segments were combined into one project routed through downtown Seattle. As changes to the Ballard portion required additional work, Sound Transit and the USDOT Federal Transit Administration (FTA) separated Ballard into its own project, and moved forward with a discrete West Seattle (WSLE) environmental review process. WSLE has been separated again into West Seattle-SODO and SODO-downtown segments, and ST has now initiated a new EIS review process for the Ballard-downtown portion.

Independent transit experts present their findings here, based on:

- researching and analyzing information from the West Seattle sections of the 2022 WSBLE DEIS, public comments submitted about the DEIS, and the Final EIS (FEIS) released September 20, 2024,
- related transit studies and historical records, (see [Appendix](#) of this document), and
- comments to Sound Transit's Board of Directors after their selection of a WSLE trackway route on October 24, 2024.

With Sound Transit estimating a \$6.5-\$7.1 billion cost for WSLE alone, funding for the Ballard project's estimated \$12 billion cost could be delayed or even canceled. This stems from Sound Transit historically underestimating costs, over-estimating ridership, delaying projects, and now approaching its debt ceiling horizon in the next few years.

Given these circumstances, Sound Transit cannot confirm when and whether WSLE may tie into the larger light rail network. In the FEIS, it forecasts 27,000 daily riders on WSLE, but it will not deliver that many until 2042, when the SODO-downtown tunnel segment is completed – requiring additional funds and creating additional impacts. Between 2032 (expected WSLE delivery date) and 2042, King County Metro will continue running its West Seattle-downtown buses. This led ST to inform the FTA (by email 5/12/23) that expected WSLE ridership will be 5400 per day for the 2032-2042 period.

Thus, WSLE will not deliver on claims summarized in FEIS ES.2.3, that it “is expected to reduce dependency on single-occupancy vehicles, slow down growth in vehicle miles traveled, conserve energy, and reduce greenhouse gas emissions.” It will not “reduce daily vehicle miles traveled by approximately 17,000 by 2042, helping to achieve Washington state’s greenhouse gas emissions goals.”

The environmental process and analysis for this project is also flawed by Sound Transit never having conducted a Modal Alternatives Analysis or Major Investment Analysis.

This analysis would have informed the decisions that Sound Transit’s Board made in choosing high-capacity transportation (HCT) mode(s) for the Downtown-SODO-West Seattle corridor. Items the analysis would have likely revealed:

1. light rail is less cost effective on a per rider basis than bus and bus rapid transit (BRT). With no evidence of Sound Transit conducting this analysis, it has failed the board, and called the board’s choice of light rail into question (See **Section 5, Item 4** for details).
2. Bus alternatives could be deployed to serve the corridor for less than \$1 billion, and would most likely attract more transit riders than the additional 2000 that Sound Transit’s FEIS predicts will ride WSLE by 2042 (see Section 2, Ridership 2.d. below).

Sound Transit’s environmental review process has revealed more disadvantages than advantages with the WSLE. With its overwhelmingly negative social, economic and environmental impacts, the West Seattle Link Extension does not satisfy the ST3 and DEIS criteria and should not be built. Expert evaluation of the environmental record shows that:

- WSLE transit times and therefore ridership will degrade West Seattle transit service, not improve it after the WSLE and Ballard LE open in 2032 and 2042 respectively
- The construction-generated carbon will be more than passenger loads on WSLE trains and TOD land use effects can mitigate over five future decades of WSLE operation.
- Acres of forest and habitat will be eliminated, and much more of it irreparably damaged
- Choosing the light rail investment over more effective transit modes presents opportunity costs for the City of Seattle, and the regional transit network:
 - Economic development in West Seattle will be set back for at least a decade
 - Equity, community-building and social justice will be set back at least a decade,
 - -- raising the question, based upon the newest, September 2024 WSLE cost estimate: “How can six to seven billion dollars be better spent to improve public transit?”

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

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

- No Build is a legitimate, legal, and responsible choice, included under federal and state law in all environmental reviews of large, disruptive transit construction projects. ST3 project sponsors can and should consider this option and should note that the facts overall point to selection of No Build.

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

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

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

- 1. The WSLE light rail plan will not improve transit or rider experience on the Downtown-West Seattle corridor. It will make them worse.**
 - a. RapidRide buses deliver passengers between downtown and West Seattle on a one seat, no-transfer ride, in about 20 minutes, though it may take longer if traffic is heavy.
 - b. A WSLE light rail + bus ride over the same route may take up to 35 minutes, depending on transfer times in West Seattle and SODO (see “transfer penalty” in [Equity 1.b.](#) below). Traffic may still be a factor causing bus rides to take longer.
 - c. Travel between West Seattle and Downtown, and points north and east will require two, possibly three transfers.
- 2. Whether the WSLE gets built (Build option) or not (No Build option), the same number of people will be riding West Seattle public transit.**
 - a. ST’s 2013 study estimated a daily ridership of up to 58,000 riders per day for the West Seattle Link Extension (WSLE). The 2016 ST3 plan reduced daily ridership to approximately 37,000 riders by 2042, and the WSLE DEIS reduced ridership estimates again to 27,000 for this segment.
 - b. The September 2024 Final EIS estimates 26,000-28,000 riders per day, (Appendix 3, Transportation Environment And Consequences)
 - i. The FEIS sorts ridership forecasts based on several options:
 - (a) M.O.S. (Minimum Operable Service), in which only the Delridge station (minimum rail line extension) is built
 - (b) Two station scenario, without Avalon station
 - (c) Three station scenario with Delridge, Avalon and Junction stations
 - ii. Appendix 2 of [Sound Transit’s Transportation Technical Report](#) shows virtually no difference between Build vs. No Build options in Downtown-West Seattle peak hour ridership and mode shares.
 - c. The only way WSLE can reach 27,000 riders per day is by taking bus riders from Metro Transit, whose 2020 West Seattle-Downtown corridor count was 27,000 riders per day.
 - d. The Final EIS on page 3-2 states, “The addition of the West Seattle Link Extension to the regional transit system would result in about 2,000 net new daily transit trips by 2042.” This number is:
 - i. not mentioned in the FEIS Executive Summary and is not otherwise publicized by Sound Transit on its website or in any other documents,
 - ii. contradicted by ST’s 5/12/23 email to FTA.
 - e. Non-rail transit modes serving the downtown-West Seattle corridor now deliver more passengers than the proposed WSLE will in 20 years. They deliver more efficiently, with lower carbon footprint and fewer environmental, economic and residential impacts.

- i. The steady reduction of Sound Transit ridership estimates is due to work from home (WFH) + hybrid office arrangements, COVID, and movement of employment and commerce centers elsewhere than downtown Seattle (see **Appendix 6., “Per Capita Transit Ridership Is Declining”**).
- 3. **Sound Transit is not building what voters approved as ST3 in 2016:**

Voters are getting a different rail plan than Sound Transit presented as ST3 in 2016:

 - i. The original Ballard-West Seattle line (WSBLE) is now two separate lines – BLE and WSLE
 - ii. **The \$1.7 billion ST3 budget for WSLE is now \$6-\$7 billion.** Listed Rapid Ride corridor improvements have not been made, and WSLE’s 2030 delivery date will not be met.
 - iii. The ST3 proposal did not describe Pigeon Point deforestation, “irreparable” habitat damage, or give any notice of a large carbon footprint from construction as documented in earlier Sound Transit projects.
 - iv. Additional carbon and pollution generated from 5-8 years of traffic congestion is not specified in the DEIS but may be tallied in SDOT’s (Seattle Dept. of Transportation) annual carbon assessment.
- 4. **Few people who voted for ST3 in 2016 understood WSLE’s significant negative impacts.**
 - a. Until 2015, Sound Transit’s ST3 plans only included a light rail connection to Ballard.
 - b. Changing course in 2016, Sound Transit included a short light rail line to West Seattle in ST3. It promised that if voters approved ST3, bus and rapid transit service would be improved, and detailed light rail planning and public outreach would follow.
 - c. The ST3 proposal did not mention negative impacts that WSLE would generate on voters’ transit experiences, the environment, and losses of homes, businesses and jobs.
- 5. **Puget Sound Regional Council (PSRC) and Sound Transit data show that by 2050, light rail will only carry 3% of all regional trips, and buses only about 5% -- despite PSRC expecting 1.8 million more residents living in the Kitsap-Snohomish-King-Pierce region.**
 - a. PSRC expects that:
 - i. buses and trains together will carry just 15% of trips In Seattle.
 - ii. most trips in the four-county region will be carried by shared and single occupancy vehicles.
 - b. The Metro Transit rationale for supporting WSLE is that transferring passengers onto the four-mile rail line will free buses it can redeploy for more frequent local service.
 - i. Data and experience, including “transfer penalty” and truncated bus routes, do not appear to support this rationale.
 - ii. Metro Transit stated to the West Seattle Transportation Coalition in 2014 that it will cancel a bus route costing more than \$7 per rider (about \$10 in 2024 dollars). The September 2024 WSLE cost estimate of \$6-\$7 billion to serve 27,000 riders, puts its per rider expenditure on its 2032 opening day at \$222,000-\$260,000 per rider (see Economics 3.2.a. below).
 - 1. Using ST estimates of 4 million WSLE riders per year and adding \$40 million per year cost for operations and maintenance, per rider cost may decrease to \$1500 for the first year, and eventually plateau at \$600 per rider in perpetuity.
 - 2. If rail does not replace bus, and per-trip cost from point A to point B is not reduced, then moving riders from bus to rail is not beneficial. If only the rider’s trip is measured, without including distance, the result may be misleading. For example:

- a. Neither Metro Transit nor Sound Transit appear to have made cost-benefit calculations to assess the transit cost effectiveness of WSLE.
 - b. Metro's plan for WSLE to replace four miles of bus corridor means it will deliver \$10 /rider passengers to one station of a \$1500 /rider rail line, then use another \$10 /rider bus to pick up the portion of those riders who don't continue on rail.
 - c. Passengers who ride further on rail may also transfer to bus at the end of their rail segment.
- iii. Electrification of the Metro bus fleet, and expansion of flexibly routed bus service that would connect riders more efficiently to destinations within and beyond West Seattle, and would yield a far better cost-benefit ratio. It could be funded with a fraction of the \$6-\$7 billion estimated for a single, four-station SODO-WSLE route.
- iv. Improving bus service should also include City of Seattle exercising its municipal authority to eliminate road bottlenecks and give buses more priority in traffic.

6. The ST3 package included funding to improve bus rapid transit (BRT) services during the light rail study and planning phase.

- a. ST's WSLE DEIS outlined non-rail improvements that could be made on West Seattle-Downtown corridor, such as roadway upgrades, and bus, van and other transit additions to increase service.
- b. But the City of Seattle, King County Metro and Sound Transit now focus only on building light rail, not on improving West Seattle bus and BRT routes for the West Seattle-SODO-Downtown corridor.
- c. Presently, public and private roadway buses, vanpools and ride-share services can carry more riders than light rail, often faster and less expensively.
- d. Unlike fixed rail, routes for non-rail options can be modified as conditions change, because roadways provide transit flexibility and redundancy options that rail cannot.
 - 1. As the Seattle area grows, transit alternatives other than light rail can, and according to PSRC, will provide better rider experiences, including more direct service, shorter wait times, and fewer transfers
 - 2. King County Metro:
 - a. is planning to transition its entire fleet of buses to electric power.
 - b. has committed to serving all West Seattle neighborhoods with public transit after WSLE is built in 2040-42. Until then, Metro is deploying on-demand Metro Flex van service in some, but not all underserved WS areas.

7. The unique light rail bridge – that has not yet been designed, would extend 1.5 miles from SODO to Pigeon Point at a minimum 100-foot height over the Spokane St. viaduct, SR99, and the Duwamish River. This presents risks of rising expenses and construction delays:

- a. No passenger railroad bridge of this length and consistent height has ever been built.
- b. The bridge will run over the [Seattle Fault earthquake and liquefaction zone](#), creating engineering challenges and downstream risks.
 - i. Structural shifting caused by the 2001 Nisqually earthquake contributed to the 2022 failure of the West Seattle high bridge, and its 2-1/2 year closure for repairs. The proposed WSLE bridge follows the same pathway at a generally higher elevation.

Section 3: Economics

1. **At the present \$6-\$7 billion estimate, Sound Transit will have spent \$1.1-\$1.3 million per rider to put each passenger on the train for WSLE's opening day** (including construction, interest payment, operations, and maintenance costs).
 - a. Opening day per rider WSLE cost is based on ST's May 12, 2023, email to the Federal Transportation Administration, estimating 5,400 boardings per day between 2032 and 2042, during the 10-year period Metro Transit continues to run its C, H and 21X bus lines on the West Seattle-Downtown corridor, until the SODO-Downtown segment is complete in 2042.
 - i. After Year 1, expecting approximately 194,000 riders per year, per rider cost may drop to \$3107-\$3621 per rider, and by 2042, drop to \$381-\$330 per rider.
 - b. By 2042, it is estimated that Sound Transit will have spent an additional \$2 billion (or possibly more) for the SODO-Downtown segment, including a second tunnel. Metro Transit will terminate Rapid Ride C, H and 21X bus service on the corridor. From that point, Sound Transit estimates WSLE ridership will increase to 27,000 boardings per day. Cost on opening day may thereby drop to \$296,000-\$334,000 per rider, calculating a \$8-\$9 billion total for the complete extension.
 - i. Depending on Sound Transit's amortization schedule for the \$8-\$9 billion total WSLE + Downtown segment construction expenditure, plus interest payments, plus \$40 million estimated annual WSLE operations & maintenance cost, overlaying annual ridership estimates of 4 million, per rider cost may plateau between \$600-\$1500 in perpetuity.
 - c. **In advocating for WSLE rail to replace buses on the 4-mile SODO-WS corridor, Metro Transit is advocating to deliver \$10 per rider passengers to a \$600 to \$1.3 million per rider WSLE train station, for a four-mile ride, to a stop where they may transfer to another \$10 per rider Metro bus.**
 - d. The non-profit Transportation Choices Coalition testified at Sound Transit's September 26, 2024, board meeting that price should be no object. Between Washington's powerful Congressional delegation able to funnel debt-relief capital to Sound Transit, and the perpetual \$1780 minimum per year in Sound Transit taxes that every Pierce, King and Snohomish County household has been paying since 2017, TCC believes money will be perpetually available for light rail projects.
 - e. In 2022, Sound Transit reported a \$12 billion budget shortfall, then recast its accounting to appear \$6 billion in debt. At ST's September 19, 2024, board meeting, ST CEO Goran Sparrman and Deputy CEO of Megaproject Delivery Terri Mestas asserted that the \$6-\$7 billion cost for WSLE can be managed.
 - f. It would appear that, if cost were no object, Sound Transit could spend any amount needed for WSLE, and tunnel from SODO to the east bank of the Duwamish, use an immersed tube or other tunnel to cross beneath the Duwamish, then tunnel from the west bank to the West Seattle Junction, reducing most impacts listed here.
 - i. This project revision would require Sound Transit to generate a separate EIS.
2. **At \$6-\$7 billion (\$1.5 billion-\$1.75 billion per mile) for 4 miles (Seattle Transit Blog), WSLE is the world's second-most expensive urban rail project**, behind NYC's subway upgrade (\$2.8 billion /mile), but ahead of San Francisco's subway (\$920 million /mile)
 - a. The \$6-\$7 billion estimate covers only the SODO-West Seattle light rail segment
 - b. Additional cost will be incurred to build the SODO-Downtown Seattle tunnel link.

3. **WSLE may present revenue losses and opportunity costs for transit across the region (Snohomish, King, and Pierce counties), and for the key light rail city of Seattle.**
 - a. While city and county revenues have decreased, Sound Transit will eliminate businesses, services and properties that pay into municipal tax rolls.
 - i. Neither ST, Seattle nor King County has run cost-benefit analyses to judge whether trading a decade's worth of WSLE-caused tax revenue losses for anticipated future revenue will pencil out – given that:
 1. Neither ST nor the City of Seattle has calculated what net economic benefits WSLE will create for West Seattle, the CID and SODO, and
 2. While light rail creates benefits in some areas, West Seattle commerce and real estate markets up to now have not significantly suffered, even during the pandemic.
 - b. Rejecting more economical transit options presents substantial opportunity costs. For the same budgetary outlay, lower cost options could likely manage prospective demand, and deliver more services for more people (See "Overlooked transport project planning process..." **Appendix Item 3.**).
 - i. The study found that the 'do-minimum' option (e.g., buses to serve a corridor vs. more expensive options such as light rail) generates a Ridership to Cost Ratio (RCR) nine times higher than the Locally Preferred Alternative (LPA – light rail in our locality), and the second-best alternative produced an average RCR that was 86% higher than the LPA.
 - c. **The FEIS states that WSLE may displace up to 133 businesses, employing 1,230 people. The final number will be uncertain until ST chooses a final WSLE alignment.**
 - i. The business (commercial and service), and job losses will be spread between West Seattle (70-100 businesses, up to 1000 jobs), SODO industrial and Chinatown-International District (CID) areas.
 - ii. The number of businesses displaced will depend on the WSLE preferred alignment finally chose. [West Seattle blogger Marie McKinsey](#) offered this list of possible business displacements in 2022, extending from Jefferson Square (37 closures) to Delridge (West Seattle Athletic Club, Uptown Espresso, Skylark Cafe), to West Marginal Way. As ST focuses more on a preferred alignment, losses will become more clear.
 - iii. Patronage estimates by affected businesses (e.g., 7-11, Taco Time, Starbucks) average 1000 customers per day, with more for larger enterprises (e.g., Trader Joe's, Safeway).
 - iv. Businesses forcibly relocated have low survival rates, particularly in minority and low-to-middle income neighborhoods: 1974 Urban Renewal study: (<https://www.kcdc.org/wp-content/uploads/2022/10/A-Case-Study-of-the-Consequences-of-Displacement-Caused-by-Urban.pdf>). "The non-survival rate was highest among the small eating and drinking, food stores, and miscellaneous retail and services."
 - v. Demographic trends show upscale, primarily White workers moving back to urban centers of employment and commerce, and non-White workers and businesses moving or (immigrants) taking up residence in suburban areas (see "'Great Inversion,'" **Appendix 7**).
 1. As these trends continue, it is even less likely minority businesses will be able to successfully relocate, and even less likely the employees of these businesses will find places they can afford to live.
 2. While light rail helps move people to areas of the city where they can recreate and consume, it does not support people who are providing the businesses and jobs for the more metropolitan population.
 - d. Rather than allowing WSLE to create an estimated \$6-\$7 billion in opportunity costs for Seattle and the region, the money could be better invested in other transit options within the WSLE

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

4. **Freight, public transit, emergency services and commuters will be disrupted, and productivity impacted for 5-8 years, as West Seattle's main roads north, west and south of the WS High Bridge are blocked during construction.**

Section 4: Local Environment and Global Climate

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

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

- d. **The WSLE becomes even less attractive from a carbon reduction perspective when Sound Transit’s construction carbon output is recalculated using the 2021 Transit Cooperative Research Program (TCRP) Report 226 (“An Update on Public Transportation’s Impacts on Greenhouse Gas Emissions.”)**
 - TCRP 226 outlines a “land use effect” of carbon reduction from people driving less because of (1) walkability in the higher density areas that would presumably develop around WSLE train stations, and as before, (2) the impact of new train riders. (See also “below, and [Appendix 2](#). “Station Development...”)
 - The WSLE FEIS references compact development and TCRP 226 on page 4.6.10. Applying TCRP 226 GHG impact methodology to the 2,000 daily additional transit riders that result from the WSLE preferred alignment yields only 1,930 tons per year of carbon reduction benefit, vs. the 2.941 tons generated by the methodology Sound Transit uses in the WSLE FEIS.
 - This lower carbon reduction number raises the years of payback on the construction carbon from 48 years (2032 to 2080) to 73 (extending out to 2105). Again, to mitigate its construction carbon footprint this quickly, ST assumes electric cars will be adopted very slowly.
 - While the DEIS Appendix L4.6 states that “general FTA estimates” have been applied, no federal project the size of WSLE’s 2+ mile,-160 foot-tall, elevated light rail bridge has ever been built or fully calculated.
 - e. DEIS Chapter 4.2.6.3 and Table 2-9 cite a daily reduction of 117,000 miles of vehicular use per day for the region. This figure is re-stated in FEIS Chapter 4, but it is not clear how this figure was computed, nor how accurate it is.
 - f. The DEIS Chapter 1.2.2.6 states the need to reduce vehicle miles by 30% by 2035, and the City of Seattle’s and King County’s goals are to achieve carbon neutrality by 2050.
 - However, light rail will not connect West Seattle to the SODO light rail station until 2032, and won’t be extended farther until 2042. The 8 to 18 years of construction period for the full ST3 light rail project delays the WSLE opportunity for drivers to reduce their personal vehicle use.
 - As Table 4.6-1 of the FEIS notes, the forecast volume of car and light truck vehicle travel in 2042 without light rail is 11,994,200 daily trips, and with light rail, 11,991,900 trips. The ST forecast regional difference between the No Build and Build options is a relatively small 2,300 trips per day.
 - Given likely imprecision, or margin of error in the calculations, these numbers signify virtually no change in driving volumes, and insignificant reductions in carbon, whether light rail is built or not.
 - g. **The FEIS does not calculate the quantity of carbon absorption lost as forest and green space areas are eliminated.** Sound Transit has already cut about 16,000 trees (apx. 140 acres) for its north-south line, according to a count from [TreePAC.org](#). Those trees would have absorbed an estimated 64,000 tons of carbon a year ([City of Seattle](#) & [One tree Planted](#)) – nearly half the carbon output from WSLE construction.
2. **The City of Seattle can ill afford to lose more tree canopy.** Seattle has lost 255 acres of trees since 2017 (acreage cut by Sound Transit within city limits may be included in the Seattle count). Globally [in 2023, forests and other land ecosystems emitted almost as much carbon dioxide as they absorbed](#), due to fires, deforestation, and other factors.
 - a. Eliminating acres of forest will exacerbate Seattle’s heat islands, which are worst around light rail stations, areas where the city’s commerce and employment are concentrated, and within its low income and of-color communities. Lower economic areas are more prone to suffer from adverse

heat conditions, fewer parks and less tree cover. They are less economically able to afford air conditioning or other means to keep cool.

- Heat sink areas, King County Executive (& ST Chair) Dow Constantine's "Three Million Trees Initiative", City of Seattle's Trees for Neighborhoods program, KC Land Conservation Initiative:

<https://kingcounty.gov/en/legacy/elected/executive/constantine/news/release/2021/june/23-heat-mapping-results> (June 23, 2021)

- b. The WSLE will eliminate three acres of north Pigeon Point Forest, plus 1-3 more acres of West Seattle green space, and beaver, salmon, heron and other species habitats there and on the Duwamish River and Longfellow Creek.
 - Sound Transit has not calculated costs for man-made elements to replace erosion control, storm water management, oxygen production, carbon sink, shade, and other ecosystem services provided by green infrastructure.
 - c. As Sound Transit runs its modest program to replace trees it has eliminated, and Seattle's recent \$13 million in federal grants will help fund planting trees in Delridge and the Chinatown International District, the two entities will simply be working back from the deficit ST will cause with WSLE.
 - d. Replacing mature trees with saplings is what Nature does after a natural disaster. Sound Transit is imitating a natural disaster.
- 3. Under Washington's Climate Commitment Act (CCA), Sound Transit's claimed level of carbon emissions in the FEIS – 146,000 metric tons over five to six years of construction – qualify it as a "large quantity carbon emissions generator" (LQG). The LQG threshold is 25,000 metric tons of carbon per year.**
- a. The best way to avoid emission is not to generate them (see **Minnesota** below).
 - b. The WSLE DEIS does not address purchases of carbon offsets, or other high-quantity mitigation plans for this massive output.
 - c. The Puget Sound Clean Air Agency's (PSCAA) analysis finds ". the Chinatown International District and Duwamish Valley neighborhoods facing disproportionate air pollution impacts, impacts from WSLE construction, and more sensitive health outcomes in the form of higher air quality-related hospitalizations."
 - d. PSCAA AQ Director Kathy Strange commented in 2022 on Sound Transit's WSLE DEIS, that "...transportation emissions will be improved in the long-term because of light rail..." The data prove otherwise.
 - e. Currently, [Minnesota is the only U.S. state holding its agencies accountable to its climate goals](#). A provision in its 2024 transportation law requires both state and municipal transportation planning agencies to take the state's climate goals into account when assessing new projects. **And it provides a guideline Washington State could emulate.**
- 4. Overall, from a carbon reduction standpoint, Sound Transit itself makes the case for choosing the No Build option for WSLE.**
- 5. Since the 1980s, federal transportation agencies and transit experts, including former ST CEO Peter Rogoff, have questioned the value of light rail for most urban areas. (See [Appendix 9](#)).**

Section 5: Equity

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

- a. The WSLE will serve the more affluent parts of West Seattle, while travel from less affluent, more diverse areas with more mobility disadvantaged citizens will require more transfers and take longer

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

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

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

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

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

4. Since no Modal Alternatives Analysis (MAA) was ever done, the environmental process and analysis for this project are flawed. This makes the Sound Transit board's choice of light rail questionable.

1. The decision to use light rail, rather than other, lower-carbon, less expensive, disruptive and destructive alternatives, was made prior to EIS analysis. Generally, an alternatives analysis is required to assure that the best and second-best options are considered, especially when benefit-to-cost ratios vary significantly across the alternatives.
2. Sound Transit and partner agencies conducted an MAA analysis to justify selecting Stride BRT for the I-405 corridor. The 2014 modal analysis for the Downtown Seattle to West Seattle corridor, however ([South King County HCT Corridor Study](#)) was completed with ST2 funding, and aimed at justifying extension of the ST3 light rail program to the exclusion of all other modes.
 - a. This ten-year-old, pre-ST3 work does not present an up-to-date, objective modal alternatives analysis. It did not weigh all potential BRT features and characteristics, or justify more than \$7 billion expenditure for a four-mile light rail line, with massive, adverse construction impacts.
 - b. ST's 2024 FEIS forecast that WSLE light rail would attract an additional 2,000 transit riders per day in the 2040s, presents an insignificant level of customer growth for a \$7 billion public outlay. Until Sound Transit completes an objective environmental process, that compares all reasonable modal alternatives for this corridor, further development of high-capacity transit should be put on hold.
3. In not listing any modal alternatives to light rail, the FEIS bases its rationale on funding, not comparative analysis:
 - a. **"The [West Seattle light rail extension] project was included in the Sound Transit 3 Plan, financing for which was approved by voters in November 2016.** The Representative Project in the Sound Transit 3 Plan identified mode, corridor, and station areas. The mode identified for this corridor was light rail." [Comment response 4 on citizen comment 0672 in Appendix O of the WSLE FEIS]
 - b. Page 6.2 of the FEIS explains further that alternative bus modes were not considered: "A purpose of the project, as identified in Chapter 1, "Purpose and Need for West Seattle and Ballard Link Extensions," is to provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor as defined through the local planning process and reflected in the Sound Transit 3 Plan. **The mode (bus) was considered in the Level 1 analysis but was not carried forward since it was not identified and analyzed in the Sound Transit 3 Plan.**"

Concluding Summary:

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

6. Sound Transit can achieve better ridership by continuing to expand and electrify King County Metro and ST Regional Express bus services, on the West Seattle peninsula, W. Seattle-Downtown corridor, and beyond.

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

1. Use emailtheboard@soundtransit.org to contact all board members. As 17 of its 18 members are elected officials, and accountable to voters, [each can be contacted directly](#) by their own constituents.
 - The Seattle members include City Council Member [Daniel Strauss](#), Mayor [Bruce Harrell](#), Council Member [Rob Saka](#) **, ST Board Chair [Dow Constantine](#) **, and King County Council Member [Girmay Zahilay](#). (** indicates lives in West Seattle). City Council Member Rob Saka chairs the City Council's Transportation Committee. [King County Council Member Teresa Mosqueda](#) also lives in West Seattle.
 - Include specific information from this document in messages to officials
 - Contact board and council members by letter, phone and email, and urge (or demand) that they:
 - Stand up for businesses, jobs, housing, communities, and the environment in Seattle.
 - Call for adopting the **No Build Option** still listed in both the 2024 WSLE FEIS and the 2022 WSBLE DEIS.
 - Require Sound Transit to consider cheaper, less destructive, lower carbon transit options than rail for the Downtown-West Seattle corridor.
 - Support using other modes, including buses, bus rapid transit, and other transit service connections to the regional rail network
2. Contact Port of Seattle Commissioners [Fred Felleman](#), [Ryan Calkins](#), [Toshiko Hasegawa](#), and [Hamdi Mohamed](#), Regional Transportation Manager [Geraldine Poor](#), Chief of Staff [Aaron Pritchard](#), and management staff [LeeAnne Schirato](#), [Kathy Roeder](#) and [Sabrina Bolieu](#).
 - Ask them to object vigorously and officially to impacts the WSLE bridge will cause, and remind them of what the Port of Seattle has opposed – obstruction of the East and West Duwamish waterways, impairment of maritime traffic and businesses, damage to the Duwamish River and Longfellow Creek ecosystems, and a huge carbon footprint.
3. Email local business organizations that will be affected:
 - *[West Seattle Chamber of Commerce](#)
 - *[West Seattle Junction Association](#)

Appendix
Additional Considerations from Research Literature

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

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

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

Based solely on dollar cost, economists at the Federal Reserve Bank of St. Louis suggest that annual light-rail subsidies in St. Louis could instead be used more efficiently to buy a hybrid Toyota Prius every five years and pay annual maintenance costs of \$6,000 for 7,700 low-income transit riders – with minimal pollution increases, and only a 0.5 percent increase in traffic congestion. Funds would still be left for all other MetroLink riders to pay for ride-share and bus fares.

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

Snohomish-King-Pierce Counties:

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

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

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

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

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

3. Selection of urban transit alternatives shows bias toward light rail over alternative modes, even when rail serves fewer riders at higher cost.

"The overlooked transport project planning process — What happens before selecting the Locally Preferred Alternative?" by [Yadi Wang](#) & [David Levinson](#), in [Transportation Research Interdisciplinary Perspectives, Volume 19](#), May 2023, 100809 // <https://www.sciencedirect.com/science/article/pii/S2590198223000568>

Analyzing 43 U.S. light rail projects, the study found that on average, the 'do-minimum' option generates a Ridership to Cost Ratio (RCR) nine times higher than the Locally Preferred Alternative (LPA), and the average RCR produced by the second-best alternative is 86% higher than that of the LPA, indicating **substantial opportunity costs of rejecting more economical courses of action**, which could have likely managed prospective demand at much lower costs and delivered more services for more people at the same budgetary outlay.

Yet, transit agencies and officials only compared the preferred light rail mode against the traditional bus mode in the Transportation Systems Management (TSM) base option, indicating selection bias and discrimination in early-stage appraisal and decision-making.

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

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

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

5. Light rail development does not reduce congestion

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

6. Per Capita Transit Ridership Is Declining

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

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

Demographic trends help to explain declining transit usage:

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

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

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

7. The Great Inversion: socio-economic status and race re-sort urban-suburban residency

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

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

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

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

8. Public transit is losing its customer base

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

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

9. Federal transit agencies and experts have questioned the value of urban light since the mid-1980s:

Ken Orski, Urban Mobility Corp. transportation management consultant, quoted in mid-1986:

“Mass transportation is the way the other fellow is supposed to get to work.”

Sam Zimmerman, USDOT Urban Grants Manager, quoted in June, 1986 (Zimmerman helped Approve Seattle’s 3rd Ave tunnel project):

- “No city is a paradigm. Good transit solutions are showing up differently in different locations. Transit agency people are ... *involved in selling a product that is obsolete for the emerging market.* (emphasis added). The traditional transit market is relatively small, not growing, and travels mainly downtown, which is where buses and trains do the best job.”

Rick Setner, UMTA Deputy Director (now FTA), quoted at Washington, DC, in June 1986:

- Determining cost effectiveness and overall cost per hour of user benefit is a complex formula. It reckons all costs (capital, interest, operations, maintenance), divided by hours of benefit — including travel time savings to existing & new riders, plus net additional new riders.
- Transit agencies want benefit hours to increase, to make the most benefit for most people. Moving people from bus to rail is not beneficial if:
 - rail doesn’t replace bus, and
 - the agency is just measuring per-trip cost of a single trip from point A to point B, without including full trip distance. The result may be misleading.
- Light rail is not flexible; it’s the equivalent of a Maginot Line (see France post-World War 1). Each NYC line in 1938 carried more than all three subway lines do now — because population has shifted to suburbs.

Alan Pisarski, author of [Commuting in America](#), quoted in June 1986:

- “A low density, highly dispersed market without substantive corridors is not something traditional transit can respond to. One of the great games is defining the notion of what comprises “transit.” It gets broader every year. Today, it’s basically everything that is not an individual car: HOV lanes (Shirley Highway HOV lane, VA, is America’s busiest transportation corridor outside NYC), taxis, car & van pools.”
- “Many city officials look at light rail as a panacea: it’s new, glitzy, and makes them a “world class” city. In some cities it’s appropriate, in many more, it has very limited application, or it is not appropriate at all, because it’s cost prohibitive.”
 - “If you have six miles to do, it makes no sense to build six miles of tunnel, and/or lay six miles of track and wire. Instead of looking to be “world class” (a PR purpose), look to move people around (transit purpose).”
- “Traditional transit service is suburb to downtown office. Suburban 1980s jobs grew three times more than downtown areas, creating a dispersed pattern of commuter travel, which cannot be easily and conveniently served. It’s the reason why there’s so much traffic congestion: we’re more dependent on cars.”
- As of the mid-1980s:
 - Only 6-8% of employees working in station-based office developments use rail to commute to work. Up to 94% use SOVs (single occupancy vehicles). While rail stimulates development, it will create more traffic congestion than before, not reduce congestion.
 - Rail transit successfully stimulates development around suburban rail stations, but only plays a modest role in serving people who work in station-based offices.
 - Building new rail lines may actually have the perverse effect of exacerbating congestion & inequity (see **3. and 4.** above).

USDOT Undersecretary Peter Rogoff, May 18, 2010, addressing Federal Reserve Bank of Boston, MA (Rogoff is former Sound Transit CEO)

- Financial difficulties facing mass transit networks are partially due to an “unnecessary focus” on rail expansion over bus improvements. Using the flexibility of buses, “you can move a lot of people at very little cost compared to rail.”
- “Paint is cheap, rails [sic] systems are extremely expensive”. He further stated, “...paint a designated bus lane on the street system. Throw in signal preemption, and you can move a lot of people at very little cost compared to rail.”

UMTA 1995 COMPARISON OF SELECTED RAIL SYSTEM COSTS, RIDERSHIPS ^

| | <u>LENGTH</u> | <u>COST</u> | | <u>AVG. RIDERS PER DAY</u> | |
|---------------|---------------|-----------------|---------------|----------------------------|---------------|
| | <u>miles</u> | <u>estmt’d.</u> | <u>actual</u> | <u>estmt’d.</u> | <u>actual</u> |
| Buffalo, NY | 6.4 | \$336M | \$536M | 184,000 (1995) | 35,000 |
| Baltimore | 14.0 | \$450M | \$990M | 206,000 (1980) | 55,000*/** |
| Wash., DC | 70 | \$2.5B | \$10B | 800,000 (1990) | 500,000** |
| Portland, OR | 15 | \$143M | \$214M | 42,500 (1995) | 20,000 |
| Sacramento | 18 | \$136M | \$196M | 20,000 (1990) | 13,000 |
| San Francisco | 71 | \$700M | \$1.7B | 255,000 (1975) | 200,000** |
| San Diego | 20 | \$*** | \$258M | 12,000 (1981) | 30,000 |
| Atlanta | 32 | \$1.37B | \$2.9B | 578,000 (1995) | 195,000** |
| Miami, FL | 20 | \$795M | \$1.05B | 202,000 (1995) | 36,000** |

M = million / B = billion

Atlanta & Washington figures assume full system in place

* Baltimore did not open until 1984

** Indicates heavy rail system. Systems are generally funded with 75% federal, 25% local money.

*** San Diego had no federal funding for its first 15.9-mile line

^ Source: Urban Mass Transit Administration

10. [City of Seattle critique of ST3 DEIS](#) (quote of excerpts):

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

11. **Pandemic-caused vacancy rate increases in downtown areas**

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

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

Robert Williams - Regional Manager-Planning & Community Development
Rainier Valley Community Development

Paul Pitkin – Director of Fund Development – Rainier Valley Community
Development Fund

As I'm sure the board/committee members know, the Sound Transit has spent the last three decades connecting and transforming communities across the Puget Sound. Through the construction and expansion of the Light Rail, Sound Transit has furthered transit-oriented development, affordable housing, community spaces, and regional growth. The Link Light Rail system benefits the communities it connects greatly, but its extension also introduces certain impacts. Major construction projects, while they provide incredible opportunities for development, also inevitably disrupt local businesses, organizations, and residences.

The Light Rail system is the catalyst of our work at the Rainier Valley Community Development Fund (The Fund) in Southeast Seattle. The Fund was founded in the late 1990s in direct response to the Light Rail's expansion into Rainier Valley. The Fund has worked for over 25 years to provide mission-driven lending to small businesses and organizations in transit-affected corridors. Since 2000, we have worked with Sound Transit, the City of Seattle, and King County to provide mitigation and loan funding to those impacted by Light Rail extension projects. These partnerships have been crucial in providing necessary community support.

As the West Seattle and Ballard Link Extensions move forward, we would like to work with Sound Transit and The City of Seattle to be a resource. We would like to ensure a well-informed, engaged community, and offer our services to anyone impacted by these construction projects. As we move forward, we can provide you with more specifics and information about our background, and our experience in helping small businesses, organizations, and residences in the greater Seattle area. Thank you for your time.