

09/10/2026 System Expansion Committee
Meeting Written Public Comment
Submissions

Submissions

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Paula Goode

Dear Mayor Birney and Mayor Roscoe,

I am reaching out to you directly because I have previously had the opportunity to meet and speak with both of you, and because I believe this issue falls within the System Expansion Committee's oversight responsibilities. I also request that you enter this letter into the September 10 System Expansion Committee as written public comment.

I recently wrote to the Sound Transit Board and General Counsel regarding what I believe is an important gap in the property acquisition process: *What constitutes "good-faith negotiation" before Sound Transit moves a property acquisition into condemnation, and what process ensures that meaningful negotiation actually occurs?* (Copy below)

I have not received a response.

I raise this from personal experience. In my own Sound Transit acquisition, I provided substantial contrary valuation information supported by independent professional appraisal reviews. The disagreement was characterized essentially as a "*difference of opinion*," but there was no meaningful back-and-forth negotiation before the matter proceeded into condemnation.

Meaningful negotiation finally occurred during mediation, after I had retained condemnation counsel. The process ultimately cost me approximately **\$44,000**. Much of the substantive exchange that occurred during that **one** day of mediation could have occurred across a table before condemnation.

My experience caused me to look more closely at the broader acquisition process. Sound Transit acquisition information I have reviewed appears to show that a substantial number of properties proceed into condemnation rather than being resolved through voluntary acquisition. I have also spoken with three attorneys familiar with Sound Transit acquisitions whose experiences raise similar concerns. I continue to seek public records to better understand the extent of this practice.

Importantly, state and federal acquisition regulations make a distinction that I believe is relevant here. They define the "**initiation of negotiations**" as the delivery of the initial written offer, but then separately establish "**Basic Negotiation Procedures**." Those procedures call for discussion of the offer and its basis, an opportunity for the owner to present relevant valuation information or propose changes, and consideration of that information by the acquiring agency.

In other words, presenting an offer begins the negotiation process; it is not, by itself, the negotiation process.

Yet Sound Transit's public-facing acquisition handbook does not clearly explain this distinction or tell property owners what the negotiation process actually entails, what Sound Transit will do with an owner's independent appraisal or counteroffer, or what steps should occur before an acquisition is referred to condemnation.

This is particularly important because eminent domain begins with an unavoidable **imbalance of power**. Sound Transit controls the acquisition process, retains the

appraisal and review professionals, has experienced acquisition staff and counsel, and ultimately possesses condemnation authority. The individual property owner did not choose to enter the transaction and may have to spend substantial personal funds simply to challenge the agency's valuation.

Some imbalance is inherent in eminent domain. **The acquisition process should not add to it.**

Now that R2026-18 has been approved and another significant group of West Seattle property owners will be entering this process, I believe there is still an opportunity to address this before those owners find themselves in the same position.

I am asking the System Expansion Committee to consider directing Sound Transit to:

1. **Establish a formal, written pre-condemnation negotiation process** incorporating, in plain language, the "Basic Negotiation Procedures" already established under state and federal acquisition requirements;
2. **Define "negotiation" in its residential and non-residential acquisition handbooks** and clearly distinguish initiation of negotiations from the negotiation process itself;
3. Require documented consideration and response to owner counter offers, independent appraisals and other material valuation information;
4. Require documented consideration of an administrative settlement before condemnation;
5. Provide an affordable neutral settlement conference or mediation when a genuine valuation dispute remains; and
6. Require the acquisition file to document that the negotiation process was completed before referral for condemnation.

None of these protections would prevent Sound Transit from exercising eminent domain when necessary, nor would they require Sound Transit to accept an owner's valuation. They would **simply provide** a defined and transparent opportunity to resolve legitimate disagreements before requiring a property owner to enter litigation.

Condemnation should be the result of an unsuccessful negotiation—not the place where negotiation finally begins.

Would you be willing to raise this issue with the System Expansion Committee and ask Sound Transit staff and General Counsel to explain the agency's current pre-condemnation negotiation requirements and whether a formal process such as this can be established? These processes ultimately affect **any** residents in Sound Transit's areas of construction.

I would appreciate a written response from the Committee, staff, or General Counsel.

Thank you both for your consideration.

Respectfully,

Paula Goode

----- Forwarded message -----

From: **Paula Goode** <paula.m.goode@gmail.com>

Dear Sound Transit Board Members and Acquisition Counsel:

As the Board considers Resolution R2026-18 and acquisition authority affecting approximately 55 West Seattle properties, I ask that you consider a basic property-owner protection:

What does Sound Transit mean by “*good-faith negotiation*,” and what must actually occur before a property is moved into condemnation?

I ask this from personal experience.

In my own Sound Transit acquisition, I provided substantial contrary valuation information supported by an independent professional appraisal review. The response was essentially that we had a “**difference of opinion**.” There was **no** meaningful back-and-forth negotiation over those differences before the matter was moved into condemnation. From condemnation notification you only have 3 options, 1. Accept the offer as presented, 2. Mediation 3. Go to Court.

Meaningful negotiation finally occurred during mediation, after I had retained condemnation counsel. That process cost me approximately \$44,000. What struck me afterward was that much of the substantive back-and-forth that occurred during a single day of mediation could have occurred across a table **before** condemnation. A property owner **should not have to spend tens of thousands of dollars to get to that table**.

My experience caused me to look more closely at the broader acquisition process. Sound Transit acquisition data I have reviewed appears to show that a substantial number of properties **proceed into condemnation** rather than being resolved through voluntary acquisition. I am seeking additional records to better understand those numbers. I have also spoken with three attorneys familiar with Sound Transit acquisitions whose experiences raise the same concern: **meaningful negotiation** frequently appears to occur **after** condemnation begins rather than before it.

That **deserves the Board's attention**, particularly now.

Sound Transit's **own procedures** and **state and federal acquisition requirements** describe more than presenting an offer and asking an owner to accept or reject it. They contemplate discussing the offer and its basis, allowing an owner to present relevant valuation information or proposed changes, considering that information, and revisiting the appraisal when new information warrants it.

Yet Sound Transit's newly updated **June 2026 Property Acquisition and Residential Relocation Handbook** describes the process to owners much more simply: an offer and appraisal are presented, and the owner is given a reasonable opportunity to

“consider and respond.” The handbook also tells owners they may obtain their own certified appraisal or professional review, **but it does not clearly explain what constitutes negotiation**, what **Sound Transit will do with contrary valuation evidence**, or **what steps must occur before condemnation**.

This gap is particularly important because eminent domain begins with an **unavoidable imbalance of power**. Sound Transit controls the acquisition process and timetable, retains the appraiser and review appraiser, has experienced acquisition staff and legal counsel, and ultimately holds the power of condemnation. The individual property owner has none of those advantages and did not choose to enter the transaction. If an owner disagrees with Sound Transit's valuation, **the burden quickly shifts to that owner to obtain professional advice**, hire an appraiser and potentially retain condemnation counsel. Some imbalance is inherent in eminent domain. The acquisition process should not **add** to it.

Before this next group of property owners enters the acquisition process, I ask the Board to establish a **formal, written pre-condemnation negotiation process**, based on Sound Transit's own procedures and applicable state and federal requirements. At minimum, it should:

1. Explain the offer and its valuation basis;
2. Give the owner a reasonable opportunity to obtain professional advice and respond;
3. Allow submission of a counteroffer, appraisal, appraisal review, remainder-damage information, or proposed changes to the acquisition;
4. Require documented consideration and response to material information submitted by the owner;
5. Require updated appraisal information and a revised offer when new information warrants a change;
6. Require documented consideration of an administrative settlement before condemnation;
7. Provide a low-cost or agency-funded neutral settlement conference or mediation when a genuine valuation dispute remains; and
8. Before referral for condemnation, require the acquisition file to document that these steps occurred, or explain why a step was not applicable.

I also ask that Sound Transit's residential and non-residential acquisition handbooks be **revised to define “negotiation” in plain language and explain the process to property owners**, including what happens when an owner submits an independent appraisal, appraisal review, or counteroffer.

None of this prevents Sound Transit from exercising eminent domain, when necessary, nor does it require the agency to accept an owner's valuation. It simply **creates a fair and transparent process** for trying to resolve legitimate differences before the property owner must enter litigation.

Condemnation should be the result of an **unsuccessful** negotiation—not the place where negotiation finally **begins**.

With a significant number of West Seattle property owners about to enter this process, I believe this is the right time for the Board to define “**negotiation**,” establish a formal pre-condemnation process, and make those protections clear to property owners.

I respectfully request a written response from Sound Transit addressing whether it currently has a formal definition or required process for good-faith negotiation before condemnation; if so, what that process requires; and whether the Board and staff will consider the safeguards outlined above before these West Seattle acquisitions proceed.

Thank you for your consideration. I look forward to your response.

Respectfully,

Paula Goode

Brien Chow

In-person Public Comment by Brien Chow, Sound Transit System Expansion Committee Meeting, Thurs., 9/10/26 at Union Station, 1:30 p.m.

I am Brien Chow, co-founder of Transit Equity for All and Chair of the Outreach Committee for the Chong Wa Benevolent Association of Washington.

Sound Transit continues to burn through taxpayer dollars by discarding years of multi-million-dollar planning and shifting project goals mid-stream. After spending millions studying 4th and 5th Avenue alternatives, the agency switched to new North and South of CID options—forcing a costly 3+ year delay for a new DEIS for work that should have been done right the first time.

Staff admitted on May 14 that Racial Equity Toolkit analysis was never completed for these new North and South of CID preferred alternatives. Worse, the agency cited community "resilience" in the 2022 DEIS to justify skipping socio-economic and equity studies for the CID.

Finally, while the agency quickly renames other stations like Symphony, our community has waited 22 years for our station's legally recognized name to be corrected—only to be told it must wait for an unscheduled redesign. Discrimination against people of color and those with disabilities rears its ugly head here.

Pause capital expenditure until Sound Transit completes an independent audit of its spending, fulfills its equity analysis obligations, and respects the identity of our community.

Thank you.

Betty Lau

Written Public Comment by Betty Lau, Sound Transit System Expansion Committee Meeting, Thursday, September 10, 2026, 1:30 p.m., Union Station

Hello, I'm Betty Lau, co-founder of Transit Equity for All and board member of the Chong Wa Benevolent Association.

Recently, representatives of transit groups met with the RapidRide R team about bus route #7 stop consolidation and less frequent service. Team members were professional, courteous, and took careful notes on each person's comments, jotting down feedback for later consideration to refine the RapidRide proposal in 2027. They also agreed to update the data on which they base consolidation decisions.

I was impressed by their genuine and meaningful community engagement—a true dialogue with community representatives.

In contrast, I received a strange email from Sound Transit staff via a city liaison. It was answers to questions I had on the Sound Transit Jackson Hub plans.

In support of CEO Dow Constantine's call for "continuous improvement," I offer the following:

1. Add contact information on the Jackson Hub plan document for people to reach out to for questions.
2. Sound Transit staff should feel free to contact me directly instead of going through city staff.
3. For contacting the CID community, use the CID Community Engagement Toolkit. Although I sent it to Government and Community Relations staff, and they said they'd use it, they don't.
4. In the email sent me on Sept. 8, Sound Transit policy was cited as the reason for not correcting the backwards name on the 5th Avenue station. Community has been asking and waiting since 2004 for this correction, which has proven confusing for those with disabilities, especially those with neurodivergent conditions or low to no vision. Matching IDC maps, apps, and station name to the CID neighborhood is confusing.

The University Street station name was changed because of confusion. Why isn't confusion for those with disabilities treated as equally important?

1. Because of the information embargo on the contents of the new DEIS and because the 2022 DEIS will be carried forward with it, reading and evaluating thousands of pages are a barrier to thoughtful evaluation and comment for limited English proficient and those with disabilities.
 - To simplify for the sake of translations, create meaningful comparison charts of each station: walking/wheeling distance to next transfer, distance to other transit modes, requires out-of-direction travel or not, number of escalators/elevators, depth, displacement stats, and so on. Sound Transit staff already created rudimentary comparison charts in 2022, but those were incomplete or compared apples to oranges.
2. The main languages of the CID are Chinese, Japanese and Vietnamese, yet no translations of materials in Japanese exist. In my visits to Nikkei Manor, residents and staff do not know about Sound Transit, largely because the residents only speak and read Japanese, as do many others in the Japanese community.
- 3.
4. Translations must be in the top languages of the region and must be distributed region wide (similar to what school districts do) because Sound Transit is a three county, region-wide endeavor. According to staff, current distribution of translations is limited to the languages around the stations. That is stereotyping where language community members live and is therefore inequitable.
- 5.
6. The Eastside is 40% Asian, yet no translated Sound Transit materials in Asian languages are placed there.
- 7.
8. Finally, I urge you to allocate the full 90 days of public review and comment for the new DEIS. It is sorely needed by the thousands of limited English proficient residents and those with disabilities who rely on various types of communicative devices and services.

Thank you.

Form Letter

Note: The following is a form letter submitted by over 50 individuals.

Sound Transit Board Meeting Comments,

Dear Sound Transit Board,

Ballard needs light rail today. We all know that waiting until the 2060s is completely unacceptable. When we voted, in droves, to expand light rail to Ballard via ST3, we entrusted you to begin service to the Market Street station in Ballard in 2035. To now hear that the “best-case scenario” is 2042 is a betrayal of community trust. We have relied on Sound Transit to steward our tax dollars for the last decade, and it is outrageous that we would have nothing to show for it, a quarter- (or even half-) century later.

We demand Sound Transit do the following to ensure that rapid, reliable transit arrives to Seattle’s only disconnected regional center as soon as possible:

1. In 2026, open shuttles between Ballard and the existing network as a stopgap until our light rail station opens.
2. Release the promised Request For Information (RFI) by October 2026 to find better and faster ways to build to Market Street.
3. Provide specific details on how your five proposed financial levers will get the Ballard date to 2042, and how Sound Transit will implement them.
4. Move quickly to incorporate industry best practices, such as those outlined in the Transit Costs Project and Transit Abundance Playbook.
5. Announce and hold a public forum in Ballard in September, 2026, to be attended by Sound Transit board members, CEO, and executive leaders, with opportunities for all community members to ask questions directly.
6. Continue to host public forums in Ballard on a regular basis, both when updates or changes need to be made to the plan, and at a minimum of every 6 months.

We all want to achieve the original dream of ST3: a world-class regional rail network. Our community is prepared to partner with you to make that a reality. We look forward to your action on the above items and your increased transparency, accountability, and collaboration going forward.

Thank you for your service to our region.

Sincerely,

Comments received after the meeting's comment deadline

Martin Westerman

Greetings Sound Transit Board Members and Esteemed Leaders,

You seem to disagree with your constituents about the definition of how to “meet planning goals and objectives” for improving regional transportation. Specifically, **PDFWAC 468-86-080** (Least Cost Planning) states, “**The methodology shall consider direct and indirect costs and benefits for all reasonable options to meet planning goals and objectives.. (It) shall treat demand and supply resources on a consistent and integrated basis.**”

Our stated goal, in testimonies, data, documents and meetings with you, is to improve regional transportation. Yours appears to be to build light rail to Ballard (BLE) and West Seattle (WSLE), at the expense of areas that were supposed to be served first by the light rail spine (Line 1).

Please note:

- we have consistently urged you to spend our transportation dollars on less expensive, more appropriate, lower carbon, faster delivery options,
- Sound Transit does not expect WSLE or BLE to increase transit ridership beyond what West Seattle and Ballard buses carry today (DEIS and FEIS),
- WSLE and BLE will make rider experience worse (adding rather than reducing transfers) and
- you are letting ST spend \$7-\$9 billion on WSLE (4x-5x above voter approved \$1.7 billion), and up to \$12 billion on BLE (4x beyond voter-approved \$3 billion).

In all this, you have not demanded that ST satisfy Least Coast Planning requirements since 2003: “The regional transportation plan adopted after July 1, 2000, shall be based on a least-cost planning methodology appropriate to the region (**RCW 47.80.070 and SHB 1928, Section 5. WSR 97-09-046 (Order 169), § 468-86-080, filed 4/15/97, effective 5/16/97**).

You also have not required Sound Transit to comply with **RCW 70A.45.020** reporting requirements: “...By 2050, reduce overall emissions of greenhouse gases in the state to five million metric tons, or ninety-five percent below 1990 levels.” Instead:

1. Sound Transit has been generating about 400,000 tons of carbon per year since before 2106, and has cut more than 140 acres of forest canopy for construction so far — reducing the region's carbon absorption capacity by more than 3400 tons a year
2. ST has never calculated the cost and carbon footprint of each proposed mobility option, nor how much more transit ridership each will attract — and how many more fossil-fueled vehicles each will remove from roadways (even though DEIS and FEIS state that neither WSLE nor BLE will reduce traffic congestion)
 1. ST's carbon mitigation plan depends on removing 100,000 fossil fuel vehicles from roadways.
 2. Since 2016's ST3 vote, electric passenger vehicle ownership in King County has increased from 14,597 to 169,839 plug-in hybrid and battery electric cars; in Snohomish County — from less than 2000 in 2016 to more than 35,000 today, in Pierce County— from less than 2000 in 2016 than to nearly 33,000 than today
 3. Sound Transit could accomplish its fossil fuel vehicle reduction goal by simply spending \$3 billion on EVs for lower income workers who cannot use public transit or light rail to reach their employment sites and meet their daily living requirements.

Killing wildlife should also be addressed. As Sound Transit's I-90 lakebed cathodic protection system has killed more than 2000 Lake Washington fish, including federally protected Chinook salmon, state

regulators and tribal authorities are assessing the damage and exploring whether formal legal penalties will be assessed.

PSRC expects by 2050 that light rail will carry less than 2% of all regional trips, despite 20% additional build-out. More than 90% of all trips will be carried by personal and shared vehicles.

1. Given these realities, why build the WSLE and BLE projects, when they will generate more than a million tons of carbon, and not increase ridership nor reduce congestion?
2. What stops the board from adding bike, pedestrian, micromobility, Rideshare (Metro Flex), automated vehicles, more buses, and when buses cannot handle capacity on particular, spoke-and-hub routes, adding light rail?

A final note: Preference for light rail is more illusion than real. In 2025, University of Sydney (Australia) transport scholars David Hensher and Corinne Mulley showed near-identical photos of a bus, BRT, and light rail stop to 1,370 people in six Australian capital cities, and asked: "Which one would you like to travel in most?" Many of those asked did not ride public transit. Yet, nearly 72% liked the light rail image; only 10% liked the bus image.

We are left with questions we have been asking all along: **what motivates the Sound Transit board to**

-
- **build WSLE and BLE rather than improve the regional public transit system and its ridership, and**
 - **allow your agency not to comply with governing statutes?**

We look forward to hearing your answers promptly,
Martin Westerman and Regional Transit Expert Colleagues