11/12/2026 System Expansion Committee Meeting Written Public Comment Submissions

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We oppose Motions M2026-51 & M2026-52 that Fund Liaisons to Bypass Environmental Oversight. We ask that you Mitigate Sound Transit's 2023 Pigeon Point Damage

Dear Sound Transit Board Members,

We have serious concerns regarding Sound Transit Motions M2026-51 and M2026-52. These motions authorize five-year, no-cost Memorandums of Agreement (MOAs) to embed consultant liaisons within the National Marine Fisheries Service (NMFS) and the U.S. Fish and Wildlife Service (USFWS) to accelerate Endangered Species Act (ESA) consultations for Sound Transit projects, including the West Seattle Link Extension.

The primary and urgent reason for our concern is Sound Transit's track record regarding the environment —specifically the 2023 clearcutting of the northern slope of Pigeon Point. The unmitigated clearcut severely compromised the West Duwamish Greenbelt by allowing a massive invasion of non-native plants, including Old Man's Beard (Clematis vitalba), Himalayan blackberry, and English Ivy. The resulting aggressive infestation is actively destroying the critical heron-supportive habitat by choking out essential native plants and threatening to kill the mature trees on adjacent land and across the Pigeon Point hilltop that these birds rely on for nesting and survival. Was there a permit that allowed Sound Transit to destroy the protective buffer zone?

The introduction of third-party, *Sound Transit-funded consultant* liaisons into federal regulatory frameworks introduces a structural **risk that future reviews will be fast-tracked, and more of Seattle's urban canopy will be destroyed**. Administrative efficiency must not replace genuine accountability, especially when past actions have already caused ongoing and potential permanent, irreparable ecological damage.

Board Members, please do not fund liaisons that bypass environmental oversight. Sound Transit has already done damage to the West Duwamish Greenbelt. We request that Sound Transit mitigate the Pigeon Point damage it has already done. We urge the Board to vote NO on Motions M2026-51 and M2026-52.

Respectfully,

Marilyn Kennell
West Seattle
mkennell@gmail.com

Paula Goode

Followup Subject: Environmental Oversight and Legal Compliance — Motions M2026-51 and M2026-52

Dear Sound Transit Board Members,

I would like to raise several questions regarding Motions M2026-51 and M2026-52 and the proposed use of consultants to assist federal agencies with environmental reviews.

While improving the efficiency of environmental consultations is a reasonable objective, federal law establishes important requirements for independent review, accountability, and protection of endangered species. I believe the Board should establish how these requirements will be maintained before approving the proposed arrangements.

1. Endangered Species Act — Independent Federal Oversight

Under Section 7 of the Endangered Species Act (16 U.S.C. § 1536), federal agencies are responsible for ensuring that their actions do not jeopardize listed species or adversely modify designated critical habitat.

More specifically, **50 CFR § 402.08** permits the use of nonfederal representatives in certain consultation activities but expressly retains ultimate responsibility for Section 7 compliance with the federal agency.

How will Sound Transit ensure that consultants funded through these agreements do not influence biological findings, determine consultation outcomes, or compromise the independence of federal reviewers?

2. Environmental Review and Potential Conflicts of Interest

The National Environmental Policy Act (42 U.S.C. § 4321 et seq.) establishes requirements for environmental review of applicable federal actions.

Where contractors prepare environmental documentation, applicable federal procedures require agency supervision, independent evaluation, and safeguards against conflicts of interest.

Will the proposed agreements include publicly available conflict-of-interest disclosures, clearly defined consultant responsibilities, and confirmation that federal agencies retain independent decision-making authority?

3. Pigeon Point — Environmental Protection and Mitigation

The reported vegetation clearing at Pigeon Point in 2023 raises a separate but important concern about Sound Transit's environmental compliance.

Seattle's environmentally critical area regulations, including Seattle Municipal Code Chapter 25.09, establish protections for designated critical areas and their associated buffers.

Additionally, the Migratory Bird Treaty Act (16 U.S.C. §§ 703–712) may apply where activities affect protected birds, nests, or eggs.

Given the reported clearing and subsequent spread of invasive vegetation, I would appreciate clarification regarding:

- What permits or exemptions authorized the 2023 clearing?
- Were any environmentally critical areas, habitat buffers, or nesting areas affected?
- What restoration and invasive-species management measures were required?
- Have those measures been completed, inspected, and documented?

These questions are particularly relevant because the City of Seattle has identified habitat protection, tree and vegetation management, and ecological restoration as important considerations for the West Seattle Link Extension.

4. Accountability Before Further Environmental Impacts

I recognize that environmental review can be time-consuming and that agencies must manage public resources responsibly. However, reducing administrative delays should not reduce the quality or independence of environmental oversight.
I respectfully request that Sound Transit make the proposed agreements and their oversight safeguards publicly available, clarify the federal agencies' responsibilities, and provide documentation of the authorization and mitigation associated with the 2023 Pigeon Point clearing.
The Board has an opportunity to demonstrate that efficient project delivery and meaningful environmental accountability can coexist.
Thank you for your consideration.

Paula Goode
Legal References

1. Endangered Species Act, Section 7 — 16 U.S.C. § 1536
   https://www.law.cornell.edu/uscode/text/16/1536
2. Designation of Non-Federal Representatives — 50 CFR § 402.08
   https://www.law.cornell.edu/cfr/text/50/402.08
3. National Environmental Policy Act — 42 U.S.C. § 4321 et seq.
   https://www.law.cornell.edu/uscode/text/42/chapter-55
4. Seattle Municipal Code, Chapter 25.09 — Environmentally Critical Areas
   https://library.municode.com/wa/seattle/codes/municipal_code
5. Migratory Bird Treaty Act — 16 U.S.C. § 703
   https://www.law.cornell.edu/uscode/text/16/703

On Tue, Nov 10, 2026, 4:02 PM Marilyn Kennell <mkennell@gmail.com> wrote:

We oppose Motions M2026-51 & M2026-52 that Fund Liaisons to Bypass Environmental Oversight. We ask that you Mitigate Sound Transit's 2023 Pigeon Point Damage
Dear Sound Transit Board Members,
We have serious concerns regarding Sound Transit Motions M2026-51 and M2026-52. These motions authorize five-year, no-cost Memorandums of Agreement (MOAs) to embed consultant liaisons within the National Marine Fisheries Service (NMFS) and the U.S. Fish and Wildlife Service (USFWS) to accelerate Endangered Species Act (ESA) consultations for Sound Transit projects, including the West Seattle Link Extension.
The primary and urgent reason for our concern is Sound Transit's track record regarding the environment —specifically the 2023 clearcutting of the northern slope of Pigeon Point. The unmitigated clearcut severely compromised the West Duwamish Greenbelt by allowing a massive invasion of non-native plants, including Old Man's Beard (Clematis vitalba), Himalayan blackberry, and English Ivy. The resulting aggressive infestation is actively destroying the critical heron-supportive habitat by choking out essential native plants and threatening to kill the mature trees on adjacent land and across the Pigeon Point hilltop that these birds rely on for nesting and survival. Was there a permit that allowed Sound Transit to destroy the protective buffer zone?
The introduction of third-party, *Sound Transit-funded consultant* liaisons into federal regulatory frameworks introduces a structural **risk that future reviews will be fast-tracked, and more of Seattle's urban canopy will be destroyed**. Administrative efficiency must not replace genuine accountability, especially when past actions have already caused ongoing and potential permanent, irreparable ecological damage.
Board Members, please do not fund liaisons that bypass environmental oversight. Sound Transit has already done damage to the West Duwamish Greenbelt. We request that Sound Transit mitigate the

Pigeon Point damage it has already done. We urge the Board to vote NO on Motions M2026-51 and M2026-52.

Respectfully,
Marilyn Kennell
West Seattle
mkennell@gmail.com

Brien Chow

Note: The content of the PDF mentioned can be found at the end of this comment.

Please find attached the PDF copy of the written public comment for the upcoming Sound Transit Board Meeting:

Written Public Comment by Brien Chow at Sound Transit Board Meeting, 11_12_26 Union Station, 1:30 p.m.

To the System Expansion Committee

Best regards,

Brien Chow
Co-Founder, Transit Equity for All

On Nov 11, 2026, at 12:55 PM, Brien Chow <chowbw@gmail.com> wrote:

* Written Public Comment by Brien Chow at Sound Transit Board Meeting, 11_12_26 Union Station, 1:30 p.m.
To the System Expansion Committee:
My name is Brien Chow. I am a co-founder of Transit Equity for All.
I write on the one decision this committee's work now controls:
the Chinatown-International District station on the Ballard Link Extension.
Every member of this Board has received the report. I emailed each member individually TEA's report, "Finish the Racial Equity Analysis: Why 4th Avenue Is the Only Choice" (October 2026, 31 pages with Addendum A), together with its one-page summary. You have received it, and you have had the time to review it. This comment puts its central requests on this committee's record.
The station is funded. Resolution R2026-11, adopted May 28, 2026, fully funds the Ballard Link initial segment… Chinatown-International District to Seattle Center… at $17.8 billion [1].
The CID station is a scope decision inside a funded line.
What remains unfinished is not the money. It is the analysis.
Four requests:
1.
Publish a duration estimate for the 4th Avenue Shallower station.
The Board directed this station into study on March 23, 2023, by amendment of Vice Chair Balducci [2]. It is roughly 45 feet deep, and it posts the fastest transfers of any option studied… 2 minutes 25 seconds on average, through a mezzanine directly into Union Station [3].
Sound Transit has never published how long it takes to build. The 10 –12 years quoted against 4th Avenue belongs to the deeper Shallow station [4].
The Board cannot compare options…
when the Board's own option has no schedule.
2.

Present one program-level schedule for the North/South split.
The split is two construction programs:

- a North station roughly 103–105 feet deep on the King County Administration Building site… a building that has stood closed for years … that closes James Street for four years, and a
- South station that, in Sound Transit's own words, "does not accommodate direct transfers" [4].

Only per-station numbers exist. The Board has never been shown the split's combined duration or its combined impact on the CID… a neighborhood that would take construction at both of its gateways.

3. Re-estimate the 4th Avenue schedule with staging secured.

- Sound Transit's own further studies work names "lack of construction staging" as a driver of 4th Avenue's duration [4].
- Staging is an input the agency secures, not a fact of nature.
- Apply the same staging assumptions to every option, at the same design maturity, and publish the comparison.

4. Answer the City of Seattle's twenty CID comments in writing.

- In its April 28, 2022 comment letter, the City found this project's environmental justice analysis for the CID deficient and filed twenty racial-equity comments [5]. Four years on, they remain unanswered.
- The duty does not depend on Executive Order 12898, revoked January 21, 2025 by Executive Order 14173 [6].
- It rests on Washington's State Environmental Policy Act, on Title VI, and on this Board's own Equitable Decision-Making Framework, adopted in R2026-11, Attachment B [1].

The performance record is not close. Sound Transit's own November 2024 findings:

5. 9,500 daily boardings at 4th Avenue against 3,000 at South of CID;
6. a 2-minute Sounder transfer at a single hub against 6 minutes under the split;
7. an 8-minute walk to Virginia Mason and First Hill against 13… and the split deletes the Midtown station outright [3].
8. The public record points the same way: the 2022 DEIS drew 5,100 comments, the overwhelming majority for 4th Avenue, and exactly one for 5th Avenue [7].

The Ballard Link Draft EIS, expected to be late 2026, will lock this scope. After it is published, these questions become litigation issues instead of staff work products.
Each Board member now holds the full report and its summary.
We ask this committee to direct staff to produce the three missing work products…

1.

the Shallower duration,
2.
the split's combined schedule,
3.
and the written answers to the City…
before the Draft EIS makes the decision for you.
The station is funded… The analysis is not finished… Please finish it.
Brien Chow
Co-Founder
Transit Equity for All
chowbw@gmail.com, 206-853-5883
transitequity4all@gmail.com
FOR MORE INFORMATION... linktr.ee/TransitEquityforAll_MFo4th
Sources [1] Sound Transit Board Resolution R2026-11, adopted May 28, 2026 — Attachment A, Table 1 ($17.8B) and Attachment B (Equitable Decision-Making Framework). [2] Sound Transit Board meeting, March 23, 2023 — amendment adding the 4th Avenue Shallower station to study, adopted 10–6. [3] Sound Transit station-planning findings, November 2024 — reported in The Urbanist, November 16, 2024. [4] Sound Transit, Ballard Link Extension further studies — station option refinements and construction assumptions (soundtransit.org). [5] City of Seattle comment letter on the WSBLE Draft EIS, April 28, 2022 — including the twenty CID racial-equity comments (42, 56, 57, 433, 753, 754, 805, 808, 813, 865, 1279, 1499, 1500, 1501, 1506, 1507, 1508, 1537, 1541, 1542). [6] Executive Order 14173, January 21, 2025, revoking Executive Order 12898. [7] 2022 WSBLE DEIS public comment record (5,100 comments), as carried in TEA's filed October 2026 comments; the record was reviewed in full by Betty Lau.

Day-Z Gould

Sound Transit may be trying to cancel critical ST4 studies

List of High Capacity Transit studies Sound Transit may be trying to cancel:

- West Seattle to Burien, Tukwila, and Renton.
- Northern Lake Washington, which includes:.
    - Ballard to U District and Sand Point.
    - Sand Point to Kirkland (& Bellevue or Redmond in East King which could still be funded).
    - Northgate to Lake City and Lake Forest Park (& Kenmore and Bothell in East King which could still be funded)
- Ballard to Northgate.

Why cancel?

Sound Transit decided to slash the budget for ST4 HCT Studies when updating the ST3 Plan in May, and since those studies begin in 2027 they now need to figure out the consequences of that action.

Sources:

- 1st image (2027 Budget) : https://www.soundtransit.org/st_sharepoint/download/sites/PRDA/ActiveDocuments/Report%20-%202027%20Proposed%20Budget%20and%20TIP%20-%2011-05-26.pdf Page 159
    - Despite the project scope listing West Seattle, North of Ballard, and North Lake Washington, only the Snohomish, East King, and Pierce subareas will be paying into this project in 2027. The changes description claims this is an entirely new project created because of the ST3 Plan update in May.
- 2nd & 3rd images (HCT Studies project which has existed since 2016) : https://www.soundtransit.org/sites/default/files/documents/HCTPlanningStudies-1.pdf Pages 1 & 2
    - The parts of the Project Area within North King or South King subareas are highlighted, and a red line to show that Ballard to Northgate was only added to this project in May of 2026. Also highlights of where the different relevant projects are in the description.
    - The detailed description of what "Northern Lake Washington" includes.
- 4th & 5th images (Changes to HCT Studies project in May) : https://www.soundtransit.org/st_sharepoint/download/sites/PRDA/FinalRecords/2026/Resolution%20R2026-11.pdf Pages 19 & 15
    - Highlights show that the update includes the original project and does not create a new project. Highlights of certain projects included in this update within North King and South King as well as new studies being added to the project.
    - Highlights show that the HCT Studies project was now only partially funded as of May 2026.

Summary & Comments:

On Page 159 in the proposed 2027 Budget, a project called "High Capacity Transit Studies" appears as a "new project" despite these studies being buried within the ST3 measure that voters approved.

The scope for this project lists corridors within the North King and South King financial subareas, however under "Allocation by Subarea" there are $0 going into these studies from North or South King. Only Snohomish, East King, and Pierce will be allocating money to these studies.

Snohomish, East King, and Pierce all have important corridor studies that need to be funded, but so do North and South King. The ST3 that voters approved included these corridor studies systemwide in all subareas and for good reason.

When the planning work is done ahead of time, that allows a future ballot measure (ST4) to only fund construction, and the project gets built much quicker after being approved by voters.

Downtown Redmond Link Extension is one example, and a major success story. Planning for this extension was included in ST2 as part of the East Link Extension, but not construction. Construction money for Downtown Redmond Link Extension came from ST3 eight years later, but because planning already happened for that project, it opened **nine years after being approved by voters**, whereas the rest of East Link opened **sixteen years after being approved by voters**.

Naturally, that means when it's time for ST4 to come in and fund construction of all these lines that were already studied, we could be **saving seven years** by doing some of this work beforehand.

It is vital for the future of this system, for our children, grandchildren, and further descendants, and for the efficient use of taxpayer dollars that **all High Capacity Transit corridor studies approved by voters *and added last May* be fully funded**.

I reached out to the main Sound Transit email as well as seven board members asking for clarity, and never received an answer. The main Sound Transit email has been ghosting me since November 1st despite two followup emails, and both board members that responded to me were just as concerned as I was.

The bare minimum Sound Transit could do is **add "North King" and "South King" under "Allocation by Subarea" on Page 159 of the 2027 Budget**, but in the interest of transparency, **a full list of High Capacity Transit corridors Sound Transit intends to study should be released**.

Thank you,

Sound Transit's Biggest Fan & Worst Nightmare,

Day-Z Gould (she/her)

Betty Lau

Written Public Comment by Betty Lau, Sound Transit System Expansion Committee Meeting, Thursday, November 12, 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.

I see the Chinatown ID is being ignored again; our pleas for a 90-day comment period, needed for the Region's many non-English speaking immigrants and refugees and those with disabilities, are subordinated to others' desires.

What makes it worse is the secrecy surrounding what's in the new DEIS.

We do know the old one (2022 DEIS) is being carried forward, and I hope the 5100 comments it generated will be addressed.

1. Inadequate analysis of CID racial, social and environmental justice led the city to criticize the Sound Transit conclusion that the CID, including 1500 low-income, mobility challenged elderly, can survive construction pollution and noise, displacement and cultural disruption.

2. We in CID oppose the taking of property from owners of color. For 5th Avenue alternatives, that means the Nagomi Plaza and the Bank of America blocks on either side of the Chinatown Gate. For the North of CID preferred alternative, it means seizing and demolishing the Reynolds Hotel, owned by the Imai Family, who hung onto it, despite Incarceration in 1942.

3. We oppose the 8-10 years of closure of CID streets, which will kill off businesses and endanger over a thousand elderly residents as they go about their daily lives: shopping, exercising outdoors, visiting friends and relatives, seeking medical care, hailing emergency ingress and egress.

Only the Sound Transit Board can right the wrongs cited above and prevent displacement of CID communities of color.

Please, step up, and direct staff to finally apply Seattle's and King County's Racial Equity Toolkits, the Sound Transit Racial Equity Tool, and the CID Community Engagement Toolkit as your staff have promised us these many years.

Thank you.

Martin Westerman

Greetings Board Members,
In 2022, former CEO Peter Rogoff told voters in three counties that this could not be done in Seattle: https://liftblog.com/2026/10/16/exploring-mexico-citys-urban-gondolas/. Clearly, that wasn't true.

Mexico City's 19 station, three-line Cablebús gondola network is fully integrated with the city's train and bus system. It uses the same transit mobility card, and its map is integrated with the city's subway map, with the same signage, typefaces and iconography. It runs between 5:00 a.m. and 11 p.m., and carries 2,000-3,000 passengers per hour per direction — up to 58,000 passengers per day — DOUBLE the 27,000 per day that WSLE is forecast to carry.

We mention this because we want you to clearly state your commitment to reducing environmental harm, as you improve public transit. So far, you have approved the "irreparable" environmental harm (listed in DEIS and FEIS) that Ballard and West Seattle extensions will cause. Several aspects of M2026-51 & M2026-52 promote that. We want you to repudiate that, and take a new direction.

We have concerns about Sound Transit's environmental compliance, following its vegetation clearing at Pigeon Point in 2023, and its plan to eliminate three acres of urban forest canopy for WSLE. This does not appear to comply with Seattle Municipal Code Chapter 25.09, or the Migratory Bird Treaty Act (16 U.S.C. §§ 703–712).

We have concerns that Sound Transit will not ensure its actions do not jeopardize listed species and habitats under Section 7 of the Endangered Species Act (16 U.S.C. § 1536). While 50 CFR § 402.08 allows use of non-federal representatives in certain consultation activities, we want Sound Transit to ensure that consultants it funds will be objective: that ST won't influence biological findings, determine consultation outcomes, or compromise the independence of federal reviewers.

The National Environmental Policy Act (42 U.S.C. § 4321 et seq.) requires environmental review of applicable federal actions. We want proof that Sound Transit will be transparent regarding contractor documentation, agency supervision of applicable federal procedures, independent evaluation, and safeguards against conflicts of interest.

To that end, with regard to the 2023 Pigeon Point clearing: we want Sound Transit to make the proposed agreements and their oversight safeguards publicly available, clarify the federal agencies' responsibilities, and provide documentation of the authorization and mitigation associated.

All this environmental damage and contention could be avoided by changing WSLE mode — from a destructive, expensive light rail, to an urban gondola line. Sound Transit could deliver twice the passenger capacity five years sooner than light rail., for 60%-70% less cost, 80% less carbon footprint, 80% less environmental damage, less destruction and disruption. Or Sound Transit could choose any of the other options we have proposed since 2017.

Vote NO on Motions M2026-51 & M2026-52. Reconsider why Sound Transit wants to cause irreparable environmental harm.

Looking forward to you doing the right thing,
Martin Westerman & Regional Transit Colleagues

PS: Selected riderships of urban gondola systems integrated with rail and bus:

- La Paz, Bolivia (Mi Teleférico): 160,000-300,000 riders per day (rpd) across its 10-line network
- Medellín, Colombia (Metrocable): 50,000-65,000 rpd; Line K carries 30,000 rpd

- Caracas, Venezuela (Metrocable): Up to 20,000 rpd
- Santo Domingo, Dominican Republic (Teleférico de Santo Domingo): ~20,000 rpd
- Toulouse, France (Téléo): 8,000-15,000 rpd
- Ankara, Turkiye (Yenimahalle–Şentepe teleferik): 10,000-15,000 rpd, with up to 86,000 rpd capacity