Dear Sound Transit Board Members,

Thank you for the opportunity to comment on the Sound Transit 3 (ST3) system plan and policies. The Transit Access Stakeholder group is a growing coalition of organizations that strongly supports connecting the Puget Sound region through affordable, reliable, and sustainable transit. Together, we represent environmental, land use, active transportation, social justice, affordable housing, and transit stakeholders, with thousands of members in the central Puget Sound region. We look forward to mobilizing our memberships in support of a Sound Transit 3 system plan that is consistent with the following framework:

**Bring light rail to more neighborhoods sooner.** Sound Transit should work with individual jurisdictions to find ways to shorten planning processes or identify more funding in order for more communities to have access to affordable, reliable, and sustainable transportation as soon as possible. Our coalition welcomes the opportunity to support you in these efforts.

**Increase investments in local transit, walking and biking access to high capacity transit.** Demonstrate regional leadership by providing funding to cities to build safe, inviting, and convenient access with appropriate wayfinding, lighting, safety, and other universal design standards within a half mile minimum walkshed of stations. Investments in local transit, walking, and biking access are an affordable, effective, and sustainable way to attract riders.

**Focus parking investments on cost-effective, flexible, and priced solutions.** We urge Sound Transit to conduct a comprehensive needs assessment for all planned parking facilities to ensure that investments are socially equitable, reflect demand, and accommodate changes in density that will occur around station areas as land use zoning and development changes over time. Parking should be priced, with revenues reinvested to improve connections for people travelling to that station on foot, bike, or transit.

**Prioritize affordable housing in the use and disposal of land.** By supporting and prioritizing affordable housing, Sound Transit can play a critical role in promoting equitable development in high opportunity transit-connected areas, stimulating infill and redevelopment, increasing ridership, and building much needed affordable homes in a region increasingly challenged by skyrocketing growth.

**Maximize potential for equitable transit-oriented development (TOD) and increased density with supporting policies, projects, investments and alignments.** Promoting a mix of jobs, services, and housing around transit stations and hubs is, therefore, critical to increasing ridership as well as to ensuring access to opportunity. Prioritizing equitable TOD provides opportunities to create communities that decreases reliance on travel by car by providing services and activities near transit, thereby reducing single occupancy vehicles and greenhouse gas emissions (GHG).

**Improve community engagement and outcomes policies** to include best practices for expanding and deepening engagement with low-income communities, people of color, immigrants and refugees earlier in and throughout the planning process. Designing an equitable transit system with optimal ridership is only possible if the region’s diverse communities have equal opportunities to participate in and influence the planning process.
The Transit Access Stakeholders look forward to mobilizing our members and supporters to vote in favor of a ST3 system plan and related policies that are consistent with our collective goals. We are the organizations that will be leading the charge to win public support for this measure in November. We were crucial in passing the Sound Transit 2 package, and we are committed to doing the same for ST3.

We propose the following specific changes to the ST3 package:

- **Improve the timeline of deliverables**
  - Make Graham Street Station an early win.
  - Work to deliver the high-ridership Ballard line sooner.
  - Change the following from future investment studies to environmental studies:
    - Ballard to University of Washington
    - West Seattle to Burien
  - Ensure funding for 130th St. Station in a way that doesn’t jeopardize Lynnwood Link, including creative partnerships with the FTA.
  - Accelerate funding for non-motorized system access improvements at existing and soon to be built stations, thereby creating early wins in communities already getting light rail.

- **Increase and improve investments in multimodal access**
  - Ensure adequate planning for transit integration and sufficient funding to create seamless connections for riders connecting by bus.
  - Bring non-motorized investments up to $500 million by increasing the allocation to the system access fund, dedicating a portion of parking revenue, or by including specific bike and pedestrian investments in certain projects. For example, on the planned Ballard light rail bridge, bike and pedestrian access should be accommodated.
  - Work with advocates to develop and adopt a Non-Motorized Access Policy that:
    - Ensures planners include non-motorized access into station designs early in design.
    - Adopts design standards for walking, biking, and transit access to stations.
    - Commits to designing stations using principles of universal design, whereby all elements of a built environment should be usable to greatest extent possible by everyone, regardless of their age, ability, or circumstances.
    - Provides specific detail on how the new system access program funds will be prioritized and allocated.

- **Make smarter investments in parking**
  - Adopt a resolution that:
    - Requires an access study to be conducted for stations with planned parking before any new parking is built.
    - Explores leased or shared parking before building new parking.
    - Prioritizes building parking as part of TOD, rather than freestanding structures.
    - Builds any freestanding parking so that it can be repurposed as TOD in the future.
    - Prices parking at new or ST-owned and operated stations with high utilization.
    - Enables ORCA as a parking payment method to ensure users are transit riders.
    - Allows ORCA LIFT users to pay reduced parking fees.
    - Reinvests parking revenue in station access improvements to make it safer for riders to walk, bike and take transit to the station.
○ Decrease funding allocated for new parking, based on anticipated decrease in demand for priced parking and investments in multimodal access.
○ Allow parking investments in all projects to be revised to include a range of strategies for providing rider access to the station, along with or instead of parking.

● Clarify affordable housing policies to align with RCW 81.112.350
○ State Sound Transit’s intent to prioritize the construction of affordable housing on surplus property, including through:
  ■ Using creative strategies that reduce land costs for non-profit developers, land banking organizations and local jurisdictions building affordable housing.
  ■ Partnering with other public entities with expertise in affordable housing finance and land disposition in order to leverage their affordable housing investments.
  ■ Accelerating the timeline for property disposition.
  ■ Including affordable housing in all joint development agreements.
○ Adopt a resolution or policy principles committing to:
  ■ Minimizing or eliminating assumptions regarding revenue from property sales in annual ST budget processes.
  ■ Using creative strategies to discount the sale of most surplus property for affordable housing, including some of all of the following: including affordable housing requirements in land valuation and liquidating federal interest in land.
  ■ Ensuring that organizations with strong ties to local communities (when paired with development expertise) are able to effectively compete in the disposition/bidding process.
  ■ Updating disposition policies to reflect prioritization of affordable housing on ST surplus property.

● Commit to improved TOD practices
○ Adopt a resolution or policy principles committing to:
  ■ Updating the TOD policy to promote better station area planning that facilitates mixed use development, affordable housing and better access.
  ■ Improve TOD planning to guide alignment decisions which promote best land use practices and facilitate housing in and adjacent to stations.
  ■ Create job quality standards for large commercial tenants at surplussed TOD sites and sites acquired through the revolving loan fund in order to promote family-supporting jobs.

● Improve community engagement and outcomes policies and procedures
○ Initiate internal racial equity trainings for Sound Transit planning staff.
○ Invite community representatives alongside local governments to provide input during initial phases of alignment and station location decisions.
○ Continue to work with advocates and community groups to create a specific community engagement policy.

● Ensure reliability for all neighborhoods by prioritizing grade separation in urban areas
Thank you for the opportunity to share these comments. This is a very important planning process, and we look forward to working with you to ensure the success of Sound Transit 3.

Sincerely,

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