

May 26, 2015

Mr. Cathal Ridge
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

Re: Federal Way Link Extension Draft EIS Comments

Dear Mr. Ridge:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Sound Transit Federal Way Link Extension. Futurewise is a statewide nonprofit, providing research, planning, and policy, to create livable communities, protect our working farmlands, forests, and waterways, and ensure a better quality of life for present and future generations.

Futurewise strongly supports the next phase of the Federal Way Link Extension. Building this kind of sophisticated, high capacity transit is a once in a century opportunity for south King County and for the central Puget Sound region. With a rapidly growing population and economy, the expansion of LINK light rail enables us to accommodate new housing and jobs without more gridlock, create livable neighborhoods and achieve greater sustainability. We appreciate that there is an urgency to move forward the Federal Way LINK extension. Now is also a good time to reflect on the lessons of past alignment decisions and design this next phase of LINK to be as effective as possible.

We believe that Sound Transit should select the alignment that has the opportunity to achieve the most economic, environmental, and social benefits, including:

- Providing the greatest ridership on public transit,
- Curbing land consumption and thereby conserving working farms and forests and protecting natural ecosystems and water quality,
- Reducing energy consumption and greenhouse gas emissions associated with transportation,
- Promoting health by encouraging walking and bicycling, cutting air pollution and reducing motor vehicle accidents,
- Ensuring access to job and education opportunities to those with the least amount of resources,
- Lowering household expenses for both transportation and housing,
- Reducing municipal infrastructure costs, and
- Meeting the increasing population growth of the central Puget Sound region.

Given the amount of investment and the opportunity for impact, it is critical that this investment achieve the full potential of environmental, economic, and social equity benefits that transit can and should provide for the central Puget Sound region.

Looking at the Transit Oriented Development (TOD) investment that has occurred as a result of earlier LINK investments, mixed use development around LINK station areas has proceeded more slowly than needed to meet demand for living, working and basic services in transit-rich neighborhoods. Many factors combine to slow the pace of TOD including lack of infrastructure, high costs of land acquisition, volatile community and neighborhood support, regulatory barriers like zoning restrictions, and a lack of policies that ensure that land use goals and greenhouse reduction goals are met at least in part by encouraging dense, mixed-use development near transit. These factors make it much harder to implement land-use plans around major transit investments that would produce greater reductions in household costs and vehicle miles traveled. The past – and looking at how far we have come and how far we have yet to go to create effective, equitable transit oriented communities-- is a reminder that the choice of alignment and station areas should not be a short-term decision but a decision with the long-term return on investment as the over-arching goal and objective.

We urge Sound Transit in its decision on the Federal Way LINK extension to commit to taking an intentional approach to not just laying light rail tracks and providing transit, but to helping build transit oriented communities. These transit oriented communities should be designed to ensure that the coordinated transportation, land use, development and investments made near light rail transit stations are directly benefiting all members of the community, especially low- and moderate-income households who depend on transit most in order to connect them to critical basic needs and to opportunities to improve their quality of life.

To achieve the most economic, environmental, and social benefits, we urge you to select the SR99 alignment option, including the additional stations at S 216th and S 260th. Futurewise urges you to consider and select SR99 alignment with these additional stations for the following reasons:

1. **The SR99 alignment best fulfills Sound Transit's commitment to TOD as stated in *Resolution No. R2012-24 Sound Transit-Oriented Development (TOD) Policy and the agency's TOD Program Strategic Plan*.** Sound Transit's Resolution No. R2012-24 and TOD Strategic Plan call for Sound Transit to "evaluate, facilitate and implement TOD as it delivers the regional transit system." Specifically, Sound Transit's own policies and plan call for the agency to achieve the following goals in its implementation of LINK light rail:
 - Encourage creation of transit oriented development, including providing market-rate and affordable housing options, basic services, and access to jobs and education near transit,
 - Increase the value and effectiveness of transit by increasing transit ridership,
 - Support implementation of state, regional and local growth plans, policies and strategies,
 - Encourage convenient, safe multi-modal access to the transit system, with an emphasis on non-motorized access,
 - Support economic development efforts, and
 - Protect and enhance Sound Transit's assets and investments.

As explained in detail below, SR99 alignment is best suited for achieving these goals.

- 2. The SR99 alignment option presents stronger TOD opportunities at every station area.** Indeed, as shown in Sound Transit’s *Federal Way Link Extension TOD Study*, the “alignments with stations along SR99 are more supportive of TOD . . . primarily due to three key differentiating factors [access, land use and land with TOD potential].” In addition, to the planned stations at Kent/Des Moines, S 272nd Station and Federal Way Transit Center, the SR99 alignment option provides the opportunity for two additional stations and related TOD at S 216th and S 260th, stations, which would not be possible with an I-5 alignment. These additional stations provide increased opportunity for TOD. Furthermore, the study shows that TOD along the I-5 alignment is severely limited by reduced station access due to I-5, limited land availability, the poor TOD potential of Star Lake Station and the lack of connection points to Rapid Ride. (*See Attachment A: Summary of TOD Support by Geographic Location.*)
- 3. With increased TOD potential, the SR99 alignment will provide better opportunities for affordable housing development and help low and moderate income households in Southwest King County reduce living costs.** Southwest King County has historically enjoyed low housing costs compared to the remainder of King County. However, there is still a significant affordable housing challenge in the area. As shown in *Attachment C*, the residents of the cities surrounding the expansion corridor have significant housing burden, meaning they spend more than 30% or 50% of their income on housing cost. In Kent, Des Moines and Federal Way, almost one in five households are severely cost burdened, meaning they pay over 50% of their income on housing. Increasing the supply of housing will reduce housing costs and provide more housing for more families. Additionally, the most significant cost for these households after housing is transportation. **SR99 presents greater opportunities for housing near transit and better access to jobs, schools and basic services, reducing the cost of transportation for households with limited means.** As shown on Attachment B, the majority of destinations and amenities in the corridor are located on SR99, not I-5. (*See Attachment B: Summary of Existing Services and Amenities.*) By increasing affordable housing near transit and providing better access to jobs, schools, and basic services, the LINK extension at SRT99 has the ability to lower significantly the housing and transportation costs of low- and moderate-income households.
- 4. The SR99 alignment option with the addition of the S 216th and S 260th stations has the highest opportunity for daily ridership.** Increased transit ridership will make the entire transit system more financially secure and further our region’s environmental sustainability goals. According to the DEIS, the SR99 alignment option will generate 27,500 daily riders, far greater than any other option. By generating increased ridership, the SR99 alignment will make the entire transit system more financially sound in the short and long-term. The SR99 alignment’s increased ridership will also better support our region’s progress towards environmental goals of reducing reliance on automobiles thereby reducing GHG emissions, reducing traffic congestion and increasing regional mobility.
- 5. The SR99 alignment more effectively supports implementation of regional and local government planning goals, policies, and investments.** The increased TOD potential of the SR99 alignment better supports the three primary strategies outlined in PSRC’s Growing Transit Communities initiative: (a)

attract more of the region's residential and employment growth near high-capacity transit, (b) provide housing choices affordable to a full range of incomes near high-capacity transit, (c) increase access to opportunity for existing and future community members in transit communities.

The SR99 alignment also better supports greater transit access and TOD potential in the PSRC designated regional centers of SeaTac and Federal Way. The SR99 alignment also supports the goals and strategies of the Kent/Des Moines "Envision Midway" Plan in which both the Stakeholder Committee and public preferred the SR-99 alignment, noting that "an alignment along I-5 was seen as antithetical to the tenets of transit oriented development by limited potential development to only west of the station."¹ The SR99 alignment would also better achieve the TOC vision of City Center in Federal Way. Having a centrally located light rail station with easy access to the Federal Way Transit Center is critical to both transit support of existing and future residences and businesses, as well as providing better transit service to people transferring at the center.

In addition to supporting local government policies and goals, by better supporting TOD, the SR99 alignment will reduce municipal costs for local jurisdictions. Transit oriented communities are the best return on investment for local governments. As the PSRC found, "...costs are generally higher with sprawl-type development than with compact development or smart growth", particularly for costs to local governments for physical infrastructure and public services.²

Finally, the SR99 alignment option will leverage recent investments by local governments to improve SR99. The cities of Kent, Des Moines, SeaTac and Federal Way have recently made significant investments along SR99 in streetscape, paving and transit amenities including the addition of Bus Rapid Transit by metro in a high occupancy vehicle lane. A light rail alignment along SR99 will enhance these investments and decrease the amount of local, regional and state funding needed to provide additional infrastructure investments which would be required if stations are located along I-5, generally on streets which have not enjoyed this investment. The existence of sidewalks, landscaped medians, bus transit and other amenities will already be in place, increasing accessibility of the new light rail stations.

- 6. The SR99 alignment option will create compact, mixed-use communities closer to transit which will better support active transportation trips, which have been shown to promote physical activity and improved health outcomes.** Compact, mixed-use communities better support trips made entirely by walking and bicycling. Walking to and from public transportation helps not only reduce our greenhouse gas emissions, but it also helps improve the health of our communities. Indeed, walking to and from public transportation specifically "helps physically inactive populations, especially low-income and minority groups, attain the recommended level of daily physical activity," and thus, helps "promote and maintain active lifestyles."³

¹ City of Kent, "Midway Subarea Plan." (adopted December, 2011).

² Puget Sound Regional Council, "Information Paper on the Cost of Sprawl" (December, 2005).

³ Besser, Lilah M., MSPH, and Andrew L. Dannenberg, MD, MPH. "Walking to Public Transit Steps to Help Meet Physical Activity Recommendations." *American Journal of Preventive Medicine* 29.4 (2005)

An alignment which respects the historic land use and development patterns of the area has two important benefits:

- First, it will enhance access to existing businesses, schools, social services, parks, grocery stores and residential development. As stated in the report *From Barriers to Solutions and Best Practices: Urban Centers and TOD in Washington*, “locating key destinations, particularly employment and retail, near transit in conjunction with higher residential densities is necessary to fully leverage accessibility from transit.⁴ SR99 already enjoys many commercial and institutional uses which will drive transit ridership. Shorter distances to these amenities -- particularly grocery stores and medical facilities -- are critical when supporting non-motorized or transit trips. (See Attachment B: Summary of Existing Services and Amenities.)
- Second, it will decrease the need for immediate new development surrounding the transit stations to increase ridership. In the corridor, where there is limited near-term demand for new commercial and residential space, it is important that there be existing development in place to support the transit system ridership. As stated in the *Federal Way Link Extension TOD Study* by Sound Transit “TOD support in the FWLE corridor is moderate. The market demand is not robust and most of the development predicted for the corridor would likely occur well after the station is constructed.”⁵ Placing stations in existing centers will give the short-term benefit of having transit-supportive destinations in place as well as the long-term benefit of driving new TOD development towards existing activity centers on SR99, supporting economic development efforts in that aging corridor.

7. Transit investment along the SR99 will support and enhance existing businesses in the SR99 corridor. TOD has demonstrated positive economic development outcomes in many communities. In “The Best Stimulus for the Money: Briefing Papers on the Economics of Transportation” various empirical studies demonstrated a 40% to 100% premium for residential housing in TOD and commercial premiums of 8% to 40% for commercial property values located near transit.⁶ In section 4.2.3.1 of the DEIS it is noted that “land uses immediately adjacent to SR 99 are predominantly commercial uses...Land uses transition to single-family and multi-family residential west and east of the commercial corridor.”⁷ The SR99 alignment provides for further access to businesses sighted within the commercial corridor, while the I-5 alignment is “mostly surrounded by residential land uses.”⁸ The I-5 alignment limits the access to businesses as well as potential mix-use zoned properties

⁴ Charles R. Wolfe and Paul Symington, “From Barriers to Solutions and Best Practices: Urban Centers and TOD in Washington” (September, 2009).

⁵ Sound Transit, “Federal Way Link Extension Transit Oriented Development Study” (April 2014).

⁶ Nelson et al. The Best Stimulus for the Money: Briefing Papers on the Economics of Transportation” April 2009.

⁷ Sound Transit, “Federal Way Link Extension, Draft Environmental Impact Statement” (April 2015).

⁸ Sound Transit, “Federal Way Link Extension, Draft Environmental Impact Statement” (April 2015)

that also border the SR99 corridor. Providing for access to businesses through high capacity transit will increase foot traffic in the area, as well as reduce car trips, increasing economic opportunity.

- 8. The SR99 alignment and related TOD will place people farther away from the harmful air pollution generated by vehicular traffic on I-5 and generate better health outcomes.** Amendments adopted on December 18, 2014 to the long range plan support the SR99 alignment for this very reason. Specifically, those amendments state: “facility siting decisions will support the environmental health of transit users and residents of transit-oriented developments”. (See December 18, 2014 Amendments, T-21.) According to the EPA, “people who live, work or attend school near major roads appear to have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic including higher rates of asthma onset and aggravation, cardiovascular disease, impaired lung development in children, pre-term and low-birthweight infants, childhood leukemia, and premature death.” These impacts are most closely associated with air pollution within 500 to 600 feet of a major roadway.⁹

The I-5 alignment will put transit riders as well as residents, employees, or visitors to any related TOD in close proximity to much higher traffic volumes, and thus, exposed to greater air pollution. As seen in Attachment D, traffic volumes on I-5 from SeaTac to Federal Way range from 160,001 to 999,999, significantly higher than SR99 which are typically in the 20,001 - 40,000 range.

The potential negative health impacts from an I-5 alignment are of particular concern in Southwest King County given the already significant health disparities found there. According to King County Public Health, residents in SeaTac/Tukwila, Des Moines, Kent and Federal Way have significant health disparities as a result of air pollution caused by vehicular traffic, including higher rates of stroke, asthma, coronary heart disease, chronic respiratory disease and lower life expectancy than in King County as a whole. (*See Attachment E: Health Outcomes in Select Communities*).

Sound Transit has demonstrated a commitment to TOD in *Resolution No. R2012-24 Sound Transit-Oriented Development (TOD) Policy*, which provides “a framework in which Sound Transit will evaluate, facilitate and implement TOD strategies...” The agency has followed through on the commitment to evaluate TOD in the Federal Way Corridor, and the results clearly demonstrate that SR99 alignment is significantly more supportive of TOD. **It is now time for Sound Transit to follow through on the commitment to do their part to facilitate and implement TOD by selecting the SR99 alignment option.**

The residents of Puget Sound have continued to support the expansion of Sound Transit, voting to tax themselves to ensure that our region continues to invest in a quality transit system. The residents and businesses of this region deserve a system which achieves the greatest return on investment possible. By choosing the SR99 alignment which has greater TOD potential, Sound Transit will not only achieve a more financially sustainable transit system in the long-term, but greater benefits to the environmental

⁹ Environmental Protection Agency, "Near Roadway Air Pollution and Health." (n.d. Web. 15 May 2015).

sustainability, economic strength and social equality and health of our region for present and future generations.

Thank you for the opportunity to comment on this critical issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bryce", with a long, sweeping horizontal stroke extending to the right.

Bryce Yadon
State Policy Director

A handwritten signature in black ink, reading "Amy E. Gore", written in a cursive style.

Amy Gore
Sustainable Communities Director

Attachment A Summary of TOD Support by Geographic Location

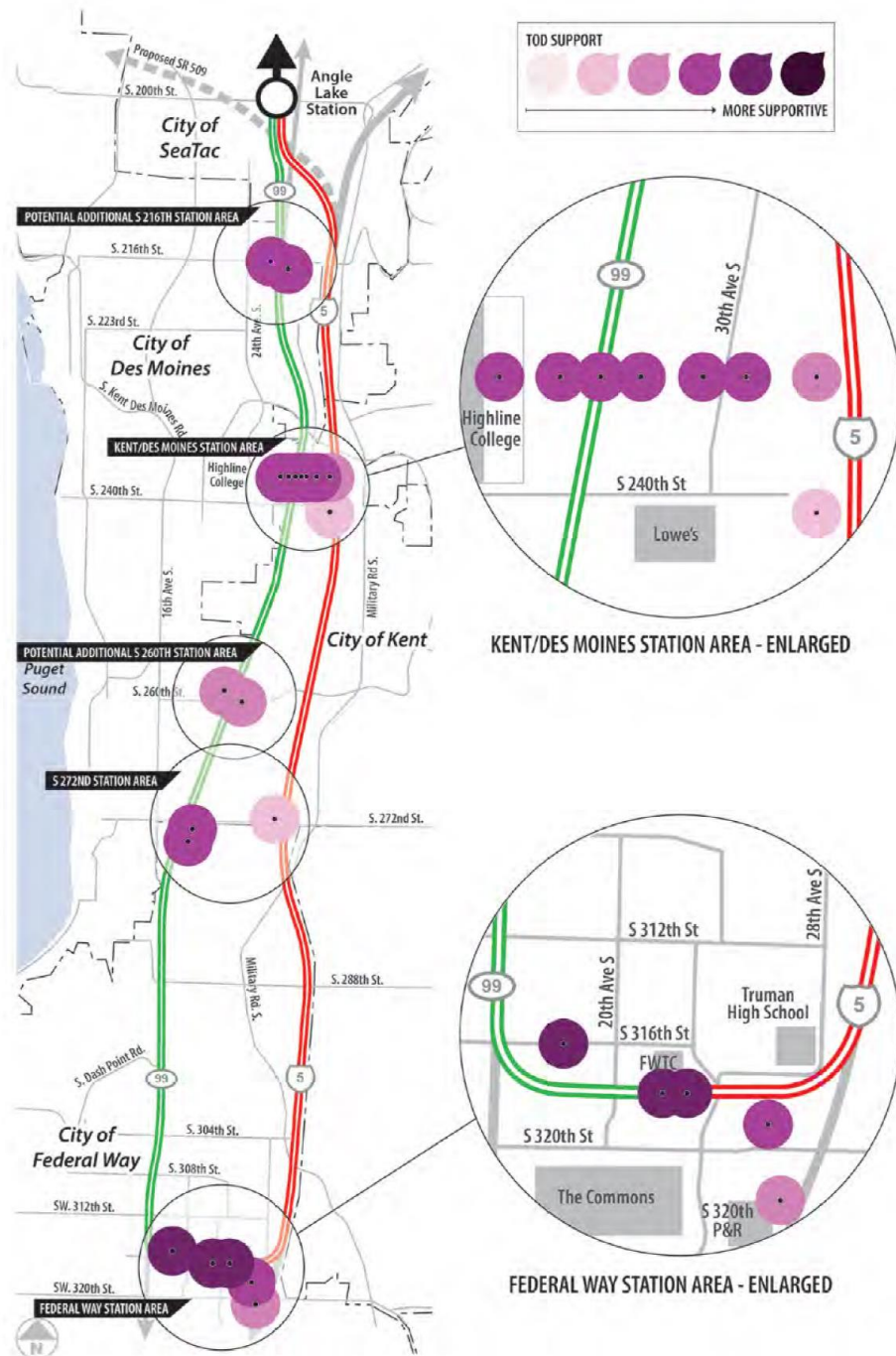
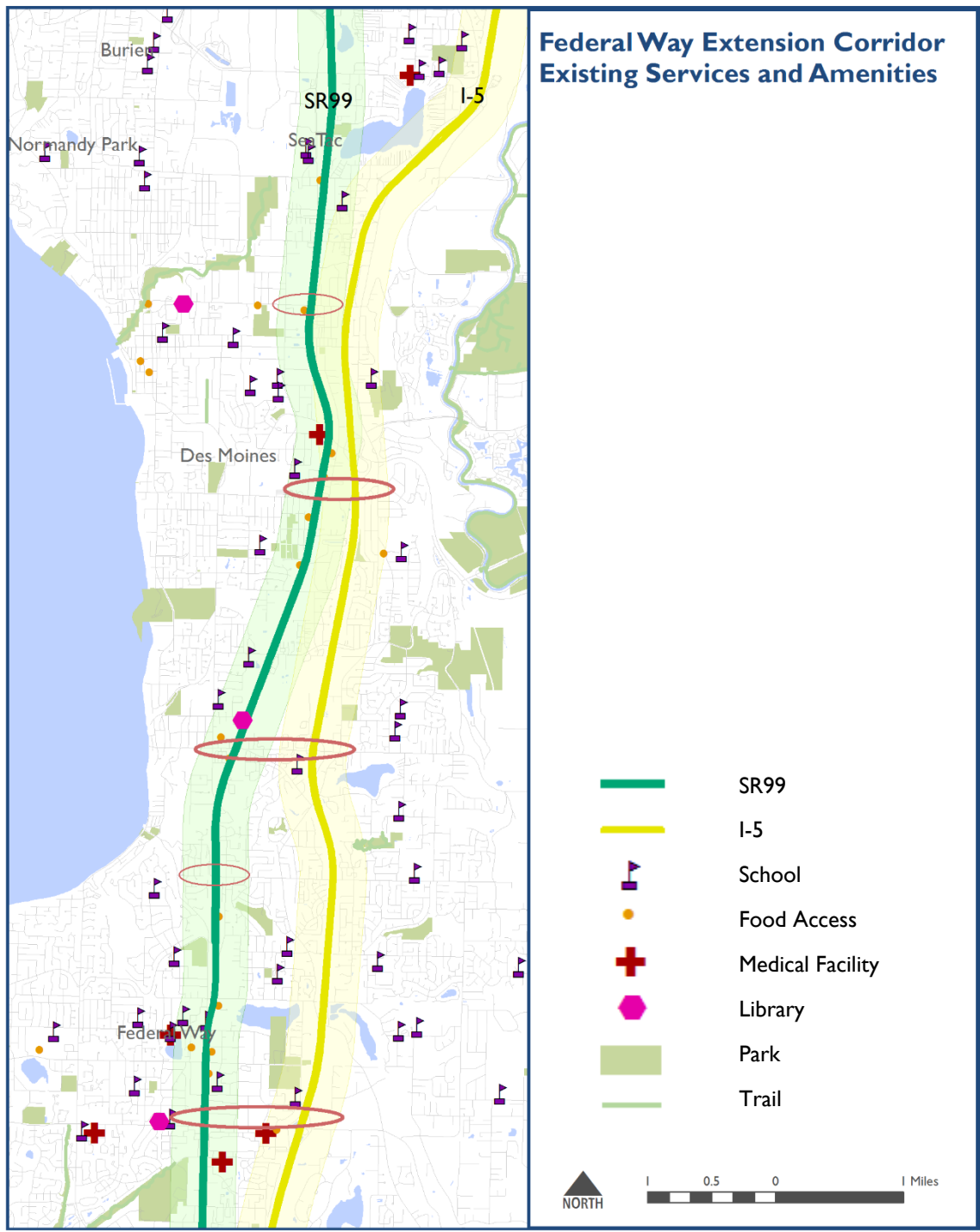


Figure 1-2
 Summary of TOD Support by Geographic Location

Source: Sound Transit, *Federal Way Link Extension Transit Oriented Development Study* (April, 2014)

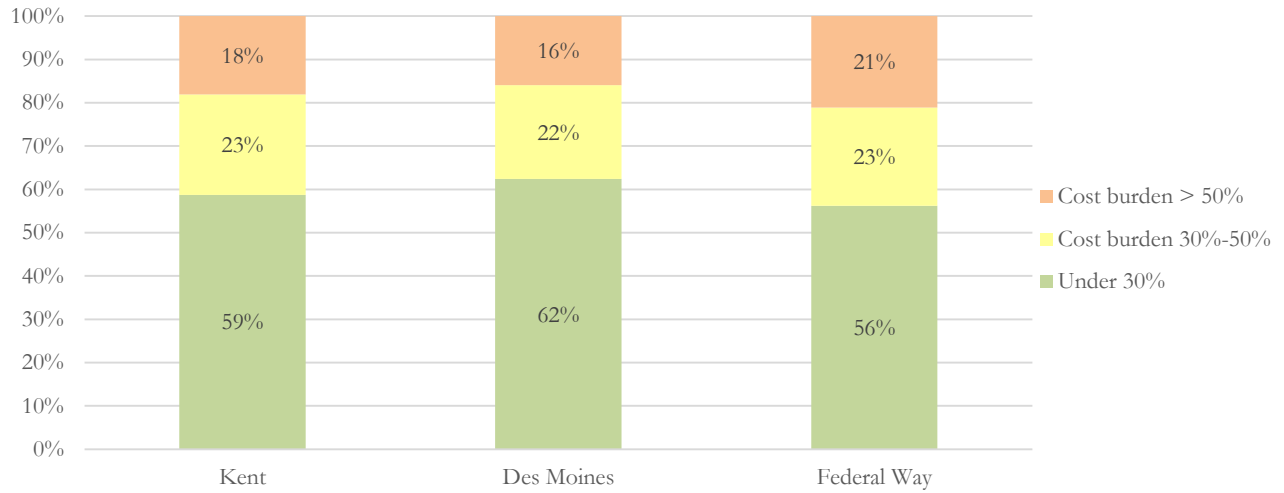
Attachment B Existing Services and Amenities



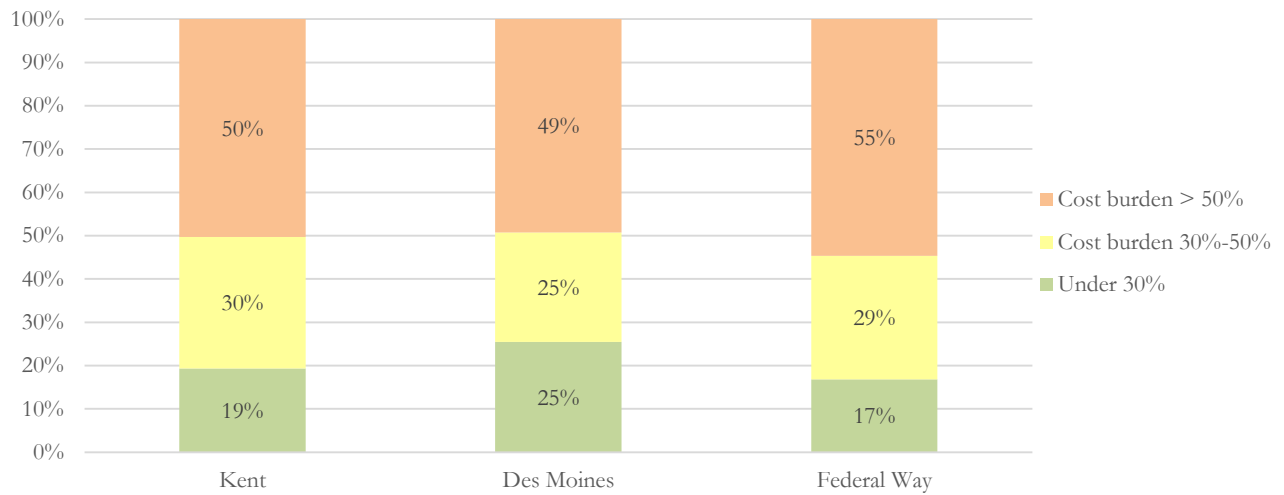
Data Source: King County GIS Center

Attachment C Cost Burdened Households

All Households

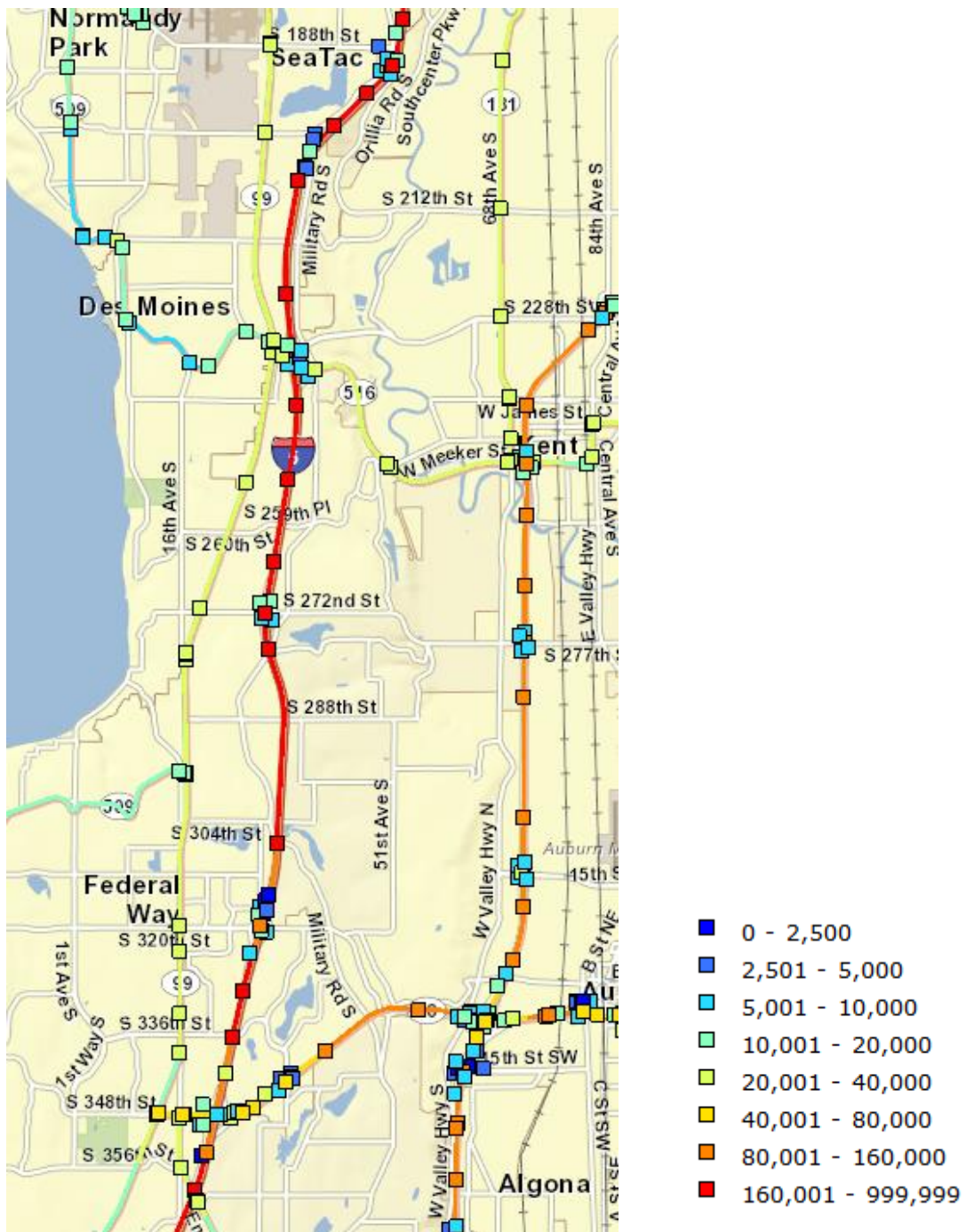


Households Earning Below 50%AMI



Source: HUD CHAS Data, 2011

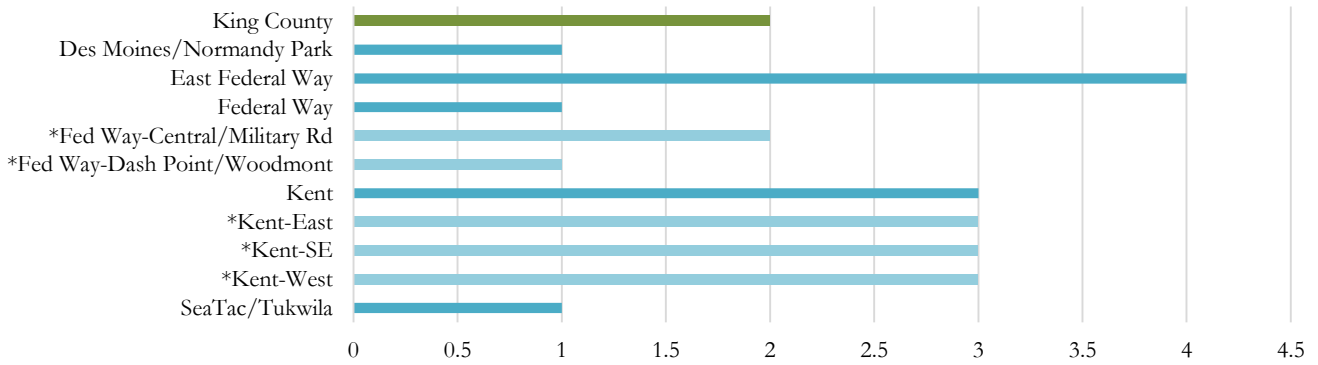
Attachment D Traffic Counts



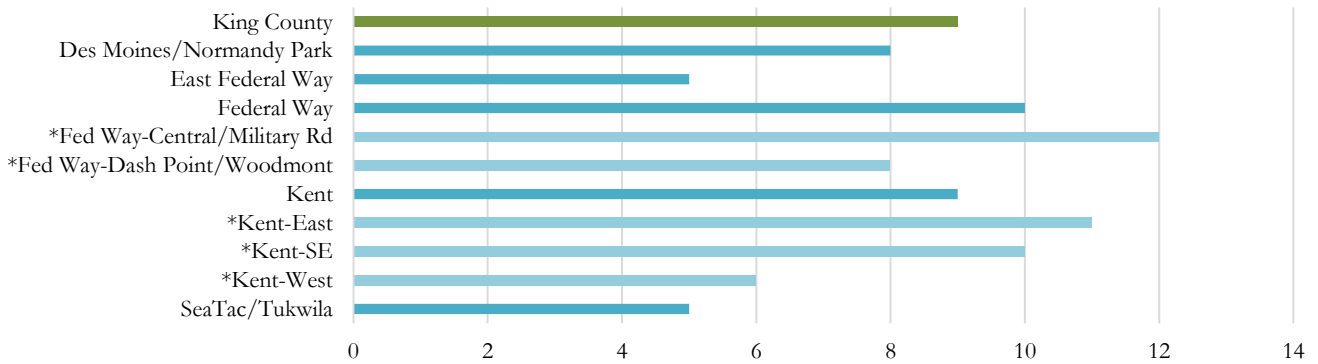
Source: Washington Department of Transportation

Attachment E Health Outcomes in Select Cities and Health Reporting Areas

**Stroke Prevalence (Adults)
 King County, 2009-2013 average**

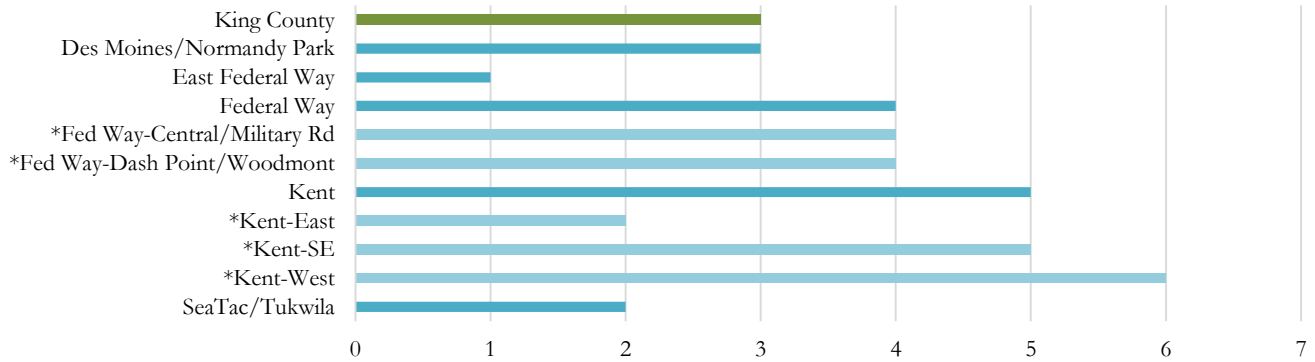


**Asthma (Adults)
 King County, 2009-2013 average**

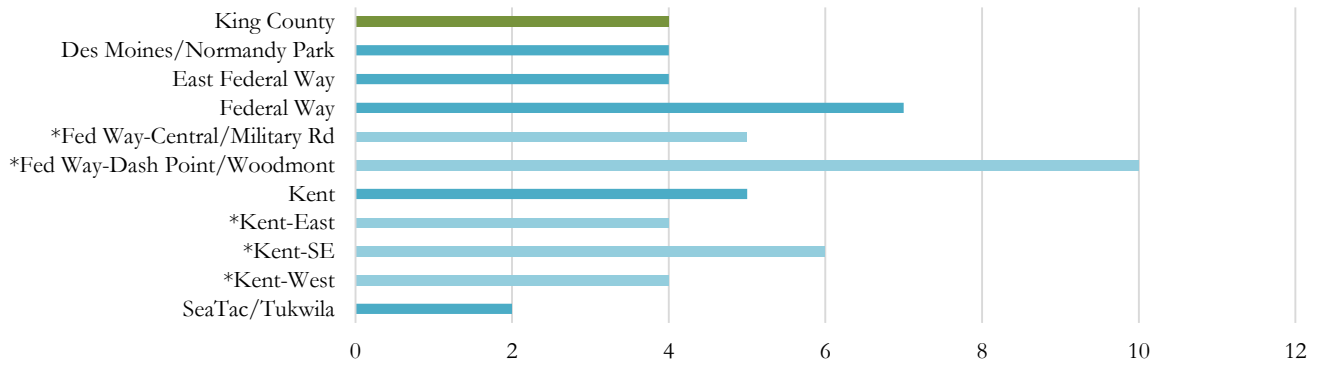


Source: King County Public Health

**Coronary Heart Disease Prevalence (Adults)
 King County, 2009-2013 average**



**Chronic Respiratory Disease (Adults)
 King County, 2011-2013 average**

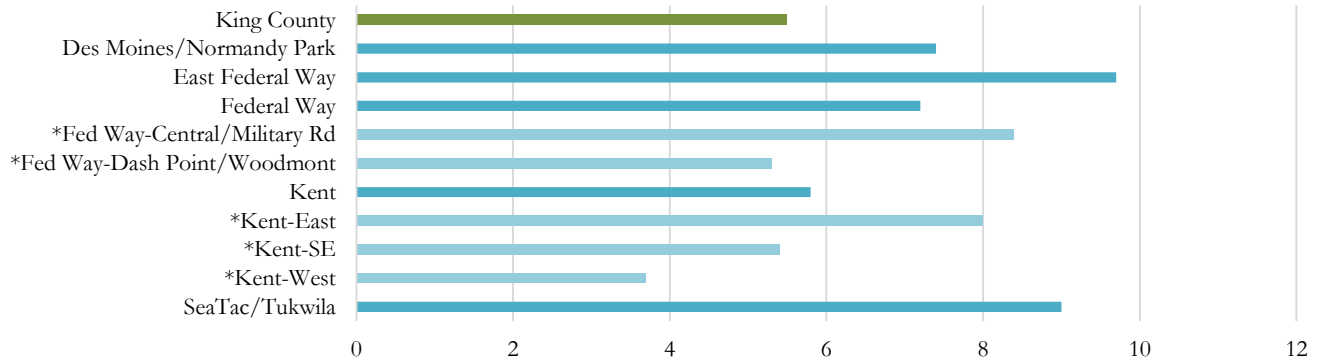


**Life Expectancy at Birth
 King County, 2008-2012 average**



Source: King County Public Health

Motor Vehicle Deaths King County, 2008-2012 average



Source: King County Public Health