



April 2, 2019

Lauren Swift, Central Corridor Environmental Manager
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Dear Ms. Swift,

The West Seattle Junction Neighborhood Organization (JuNO) represents homeowners, renters, business operators, and other community members - all of whom are excited about the prospect of light rail coming to West Seattle, but who also want Sound Transit to use a once-in-a-generation opportunity to plan for this arrival wisely.

After reviewing the presentations from Sound Transit to our community, JuNO has chosen to support a light rail line that enters the West Seattle Junction Urban Village (WSJUV) by tunnel and ends facing south at an underground station at either 41st or 42nd Avenue SW.

We are convinced a tunnel with this alignment will spur the construction of affordable housing the neighborhood badly needs; reduce construction-related displacement; maximize the potential for transit-oriented development (TOD); and increase the two-way ridership needed to fund Sound Transit's operational budgets.

Simply put, there is a far greater upside to an underground alignment of light rail.

This letter provides details on why this alignment is critical to the economic growth and livability of the WSJUV and its surrounding areas, as well as scoping comments that detail specific environmental-impact issues that must be studied for any alignment option.

Thank you for the work with our community to date. We look forward to a continued, productive partnership that makes the most of this generational opportunity.

Sincerely,

Amanda Sawyer, Executive Director

Carl Guess, JuNO Public Relations

Rich Koehler, Janine Rees, Kevin Freitas, Joe Fuller & Christy Tobin-Presser -
JuNO Land Use Committee



Fast Growth, Destination Neighborhood, Finite Buildable Land

With 84% housing growth, the WSJUV has been the fastest growing urban village in Seattle since the year 2000; ¹ that city-leading growth is forecast to continue through at least 2035. ²

This growth is of no surprise to people who live in the area. West Seattle is a vibrant community with family friendly traditions, historic buildings and legacy businesses that make it a destination neighborhood. Need pickled walnuts? Go to Husky Deli. An old Nina Simone recording? Head to Easy Street Records. Or just walk the Farmers Market any month of the year for newly picked produce, fresh yogurt, or some of the best falafel in the city.

This unique and characterized neighborhood will draw riders on light rail to the WSJUV and let them experience things they can't find in other parts of Seattle.

Yet land is a finite commodity in the city - and becoming even less so.

With a population of 686,800 in 2016, Seattle is projected to add 120,000 by 2036. ³ That growth has caused local legislators to adopt land-use rules to further increase density. The recently passed HALA/MHA legislation, for example, increased zoning and removed parking requirements in 27 urban villages, including the WSJUV, to maximize the use of buildable land to create more affordable housing.

Less visible, but equally impactful, are stresses that ongoing growth and development have placed on livability in the WSJUV. The City has already designated it *underserved* in terms of parks and open space. What's more, JuNO independently measured the available tree canopy approximately 12 months ago and found it to be roughly half the citywide average.

With an affordable-housing shortage and land being in limited supply, bringing light rail into a dense community in an above-ground fashion is a complete contradiction to making the most of the buildable land that is currently available.

Below-Ground Approach Has Far Greater Upside

While a tunnel and underground station will impact the community and result in some displacement, it will also create the opportunity to develop denser housing options. Those options could include affordable housing; work spaces and other TOD efforts that draw people into the neighborhood and increase two-way ridership; and the opportunity for much-needed green space above an underground station to serve a growing population.

¹ Seattle 2035, Appendix A, Figure A-1

² Seattle 2035, Appendix A, Figure A-1

³ Seattle 2035, Introduction.



More Affordable Housing

One unfortunate consequence of the HALA/MHA legislation is that it won't bring many units of affordable housing to the WSJUV. That's because the MHA program allows developers the option of building those units or paying the City to build them *elsewhere*. After upzoning more than 400 single-family homes in the WSJUV, the City estimates developers will create only *nine* units of affordable housing;⁴ the rest will be offered at market rate.

Fortunately, the City has committed to a 2020 update of the WSJUV neighborhood plan. This plan will recognize the forecasted light rail alignment and station placement. That means the community has the opportunity to create more affordable housing units, making it more economically diverse and access to light rail more equitable.

Yet an above-ground alignment would make these efforts exceedingly difficult. The current Orange Line proposal, for example, would permanently remove the land of 120 parcels from development.⁵ Gone forever would be the opportunity to build taller buildings with more units for families seeking affordable housing.

New Work Spaces, TOD, Increased Two-Way Ridership

The 2020 neighborhood-planning effort could also create what JuNO has long envisioned: multi-use buildings that include working spaces. The ability to create a jobs center in the heart WSJUV area would allow people to walk, bike, and bus to work - without ever getting on a West Seattle Bridge that has only become more crowded.

For Sound Transit, a jobs center would create increased two-way ridership. Instead of full rail cars bringing workers into Seattle, only to return empty, office buildings would help draw more riders that would help fund a greater share of the light rail operating budget.

Again, a far better use of scarce buildable land.

Greenspace

The WSJUV is *underserved* with respect to parks and open space⁶ and a growing population will only put greater pressure on that parkland. A below-ground station could add available open space through the creation of a landmark public plaza or park. Assuming that some Seattle Parks land is taken from the golf course area, this would be a great opportunity to perform a

⁴ MHA FEIS Section 3.1 Ex39

⁵ Sound Transit Presentation - JuNO 3/25/19 Meeting

⁶ Seattle 2017 Parks Plan



swap and essentially move greenspace on the periphery of the WSJUV to a location that is centrally usable by the surrounding rental units and our broader community.



EIS Scoping Comments

JuNO requests that Sound Transit study the following issues in preparing its draft Environmental Impact Statement for the West Seattle light rail extension:

Aesthetics

- Analyze how the proposed structure of an elevated alignment would impact the aesthetics of the remaining residential neighborhood and business district.

Emergency Services

- Study the impact of an elevated track on emergency services, including impacts that would change or degrade current response times.

Canopy

- Measure the baseline tree canopy in the WSJUV and, separately, along the proposed light rail routes;
- Analyze the impact on tree canopy of elevated track and station vs. a tunnel and underground station within the WSJUV.

Cost

- Study the cost-saving impact of the removal of the Avalon station.
- Study previous tunnel-related efforts by Sound Transit that have resulted in budget savings, including the construction of the Northgate Tunnel.
- Study and enumerate alternative funding opportunities including, but not limited to, additional federal, state, and City contributions; and excise and/or other taxes.

Equity

- Study equity-of-access on a system-wide basis, paying particular attention to those neighborhoods where light rail enters underground into dense communities with hilly topographies (i.e., First Hill, Capital Hill, University District).

Height, Bulk & Scale

- Study the impact on views, privacy, shading effects, and access to light at all levels below track, including but not limited to street level, of an elevated track and station.



Housing

- Calculate current housing units lost/displaced due to construction of an elevated track and station vs. a tunnel and underground station within the WSJUV.
- Study the feasibility of adding greater density, including square footage for employment opportunities and affordable housing, to the core commercial areas east of the Junction, also known as the Triangle.

Infrastructure

- Study the impact of all construction activities on city streets, including but not limited to the damage to roadways caused by equipment and the costs to repair.

Livability

- Perform a noise evaluation of an elevated track and station vs. a tunnel and underground station within the WSJUV, including octave-band and vibration analyses.
- Conduct all noise analyses for these three areas:
 - Construction zone;
 - Construction lie-down area;
 - Parcels along alignment right of way not acquired through eminent domain.⁷
- Study the light-pollution impact of an elevated track and station vs. a tunnel and underground station - both during and after construction.

Parks & Open Space

- Analyze the opportunity to create new park lands as part of an underground station.

Traffic

- As the WSJUV is one of the few access points to the West Seattle Bridge, conduct a traffic study - for both an elevated track and station and a tunnel and underground station - to understand the impact on cars and busses during construction and once light rail is operational.

⁷ It is crucial to understand the daily noise impact on those whose structures will be left standing once construction is complete.



Transit-Oriented Development

- Study the TOD potential for an elevated track and station vs. underground tunnel and underground station within the WSJUV.
- Study bus integration for station placement for elevated track and station vs. a tunnel and underground station within the WSJUV
- Study pedestrian and bicycle access transit, taking into account topography and potential hazards, for elevated track and station vs. a tunnel and underground station within the WSJUV.

Walkability

- Measure the impact on walkability of elevated track and station vs. a tunnel and underground station within the WSJUV.
- Study the impact of making Alaska Street a pedestrian walkway, as envisioned in the Junction Design Guidelines (SMC 23.41.004).