



June 6, 2023

Director Greg Spotts
City of Seattle Department of Transportation (SDOT)
Seattle Municipal Tower 700 Fifth Ave, Suite 3800
P.O. Box 34966 Seattle, WA 98124

Dear Director Spotts:

We are a coalition of neighborhood organizations, industrial stakeholders, businesses and property owners who share strong concerns about SDOT's plans to add road diets, lane restrictions and bus-only lanes through primary neighborhood arterials in Ballard, Fremont and along Westlake Ave N as part of the Route 40 Transit-Plus Multimodal Corridor Study.

As SDOT's website confirms, before COVID, Route 40 was one of Metro's highest ridership routes with 13,000 weekday riders. That number has dropped to an average of 7,000 riders – roughly half of the pre-pandemic ridership levels. While this number is touted as strong, it is still drastically less ridership than when the Route 40 changes were studied.

As small businesses continue to recover from the global pandemic – and are now facing economic recession and historically-high inflation – we are deeply concerned that the proposed Route 40 changes are not based in reality. The proposed changes do not account for the fact that commute and office work patterns have forever changed.

We share SDOT's transit and multimodal goals for Seattle's neighborhoods and are advocates for connecting our north-end communities with reliable transit service. But these changes must be grounded with reliable, targeted, real-time data that includes an evaluation of current ridership and traffic patterns. Here are our specific concerns about the proposed changes to Route 40 organized by segment:

Bus Ridership Will Increase When Transit Rider Health and Safety Issues Are Addressed

New changes, such as those proposed for Route 40, are banking on assumptions that post-COVID ridership will continue to grow and return to pre-COVID levels. This only focuses on return-to-work and does not address the serious health and safety issues that continue to impact bus riders and ridership.

New King County Metro data that states there were 1,885 reports of drug use on their bus system in 2022 alone. In addition, the Amalgamated Transit Union (ATU) recently reported that oxycodone pills, commonly laced with fentanyl, are “openly smoked or ‘freebased’ by riders aboard buses and trains, exposing riders and operators to fumes often described as ‘sickening’.

The public safety issues also directly impact neighborhood businesses. For example, the Starbucks located on the corner of Fremont Ave N and N 34th St. recently announced it is closing, due in large part to the sustained impact from the Route 40 bus idling directly in front of the store multiple times a day-- and the crime and theft that accompanies the bus presence on a daily basis.

There must be a clear plan from King County METRO on how they will address open air drug use on buses, which is a health, safety and equity issue for transit riders and drivers. Without a plan, it is clear ridership will continue to struggle long into the future.

Access Concerns from Westlake Ave N. Property Owners and Maritime Tenants

Adding a dedicated bus lane on both the east and west sides of Westlake Ave N. is a significant reduction in capacity with direct impacts to existing property owners and tenants. While SDOT has responded to the specific concerns for freight deliveries of one property owner on the west side of Westlake North (Pelington Properties) by creating a transitional delivery lane, the plan still includes a bus-only lane both north and south-bound.

Even when ridership was at its height, there have been no issues of congestion or delays for busses on Westlake N. Bus only lanes are a solution to a non-problem and should be removed from the plan. We appreciate the inclusion of a pedestrian-operated crosswalk to enable residents, business owners and customers to safely cross the street and the addition of a bus stop at Halladay.

One lane of car traffic headed north is very likely to cause long backups in the summer as the Fremont Bridge is raised. The summer cueing currently extends about a half mile down Westlake with two lanes for car traffic. Again, with ridership still under 50% of pre-COVID numbers and a lack of data on post-COVID ridership trends, this change would have significant impact on workers, residents and small businesses who must have dependable access over the Fremont Bridge.

There is a secondary impact to this cueing with the dedicated bus lane just north of the Bridge on 36th Ave N that will compound through Westlake Ave N. in the summer.

Significant Impacts for Fremont Neighborhood Thru Put

Reducing traffic east/west from the north end of the Fremont Bridge roughly ten blocks to First Ave NW will have significant impacts on commute times for residents, workers, and will impact

small business owners. We have not seen a quantified and meaningful transit time savings and clear transit benefits relative to the considerable and sustained neighborhood impacts.

This stretch is already very volatile to backups and long wait times headed north or south over the Fremont Bridge, which is compounded in the summer. Summer traffic includes significant and important tourism traffic, as visitors to the Nordic Museum, the Ballard Locks, the Shilshole Bay Marina and Golden Gardens Park.

We all know daily commute trips, specifically those going to-and-from downtown, changed dramatically during COVID. It's becoming equally clear that we do not yet know what the 'new normal' will be and a return to work at pre-COVID levels may not happen. Fremont is a strong example of how without updated data, and more time to see how commute patterns will evolve, the proposed Route 40 changes could result in negative unintended consequences that create neighborhood thru put hardships that cannot be undone. Saving a few minutes on bus arrival times for the magnitude of potential impacts does not seem warranted.

We're also concerned about ongoing queueing issues and their corresponding carbon impacts in Ballard, Fremont and along Westlake Ave N. over time. As we know, transportation is the largest source of carbon pollution in our state, contributing roughly 22% of total air pollution and 39% of greenhouse gas emissions throughout the state. By creating a scenario where we're adding dedicated bus lanes for buses that are at 50% capacity and at the same time adding significantly to traffic idling times does not seem to meet our city's carbon reduction goals. To that end, [Sustainable Ballard](#) recently held an Earth Day awareness campaign about the neighborhood impact of idling on air quality and climate.

Impacts of Ballard Road Diet, Dedicated Bus Lanes Outweigh Benefits

The addition of a 24/7 north bound bus-only lane on Leary Avenue NW between 20th Avenue NW and NW Market Street will have substantial access impact on small businesses, as well as residential and retirement communities located all along the corridor.

Leary Avenue NW is a highly-trafficked thru put and connector for residents, workers and visitors headed northwest into Ballard. SDOT's proposed road diet and dedicated bus lanes on Leary Ave NW will force car trips off Leary and further complicate already very congested neighborhood traffic patterns. . In addition, NW Ballard Ave is now mostly one-way and one-lane in some areas, with heavily reduced on-street parking due to the street cafes.

With both important north / south neighborhood streets already feeling the strain of multiple transit / bicycle / pedestrian / general through-put objectives, reducing car through-put for Leary Avenue NW and east / west via NW Market Street is very problematic.

Equally impactful, the 24/7 bus lanes in both directions of NW Market Street between Leary and 24th Avenue NW – along with new curb bulbs – will eliminate two travel lanes, as well as already

scarce on-street parking spaces and load zones that are very needed for the small businesses located along this corridor.

Accessing west Ballard via Leary Avenue NW or NW Market Street, mostly via car, is the primary route for the tens of thousands of (mostly tourist) visitors who head to the Ballard Locks and National Nordic Museum. Even for the tens of thousands of local visitors who attend the very popular annual summer events in the heart of downtown Ballard (SeafoodFest, Syttende Mai Parade), our data shows that most do not arrive via bus. Encouraging local and family bus use to annual Seattle events will need a dedicated marketing effort from SDOT.

We appreciate the attention to improving pedestrian safety, but equal attention needs to be given to the impacts of on-street parking removal, bus-only transit lanes and road diets will have on small businesses along Leary Ave NW, which depend on customers' ability to easily get to and access their shops.

In addition, the proposed changes do not consider that the city is also still considering Leary Ave NW as a possible Burke-Gilman Trail 'missing link' alignment alternative and the compounding impact these changes would have on this important route through Ballard.

Further, SDOT does not have current data that demonstrates the transit benefits created for Route 40 riders outweigh the impactful costs to the neighborhood.

SDOT did not conduct a thorough existing conditions study to identify the specific areas where improvements are needed, let alone the consequences that will result with respect to side-street congestion and overloaded vehicle queues, reliable movement of freight, and increased idling that will result in excessive carbon emissions.

In summary, while we are all supporters of transit and SDOT's ongoing investment in new system improvements, there's a significant body of study work that must be done to ensure the pre-COVID changes proposed to Route 40 are still aligned with neighborhood commute patterns, ridership goals, and business and resident concerns from our coalition.

In addition, the Northgate light rail station opening, which was not a factor when Route 40 pre-pandemic ridership data was collected, will also have a meaningful impact on transit commute patterns and should also be considered.

Specifically, our stakeholder group needs to better understand impact and would be assisted with the following information from SDOT:

- Current data that compares baseline transit travel time to travel time with the improvements - by segment and approach to intersections;
- Current transit travel time benefits by location and time of day;

- Benefits accrued to transit riders compared to the impact to adjacent businesses and neighborhoods; and
- Current impact data from the Vissim analysis that addresses different stakeholder concerns. For example, peak hour queueing on side streets is important to neighborhoods and travel time in general-purpose traffic lanes, and the width is important to freight transport.
- We have recently received the 60% design plans and initiated a review of those plans. We are finding some inconsistencies between the 60% design plans and what is shown for public review and feedback on the Route 40 website. We need to understand the differences and what is the actual design.

In closing, we all share SDOT's transit and multimodal goals for Seattle's neighborhoods and are advocates for connecting our north-end communities with reliable transit service. It is with this in mind that we request implementation any Route 40 changes are paused until these significant issues can be fully addressed.

Sincerely,

Mike Stewart, Executive Director
Ballard Alliance

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North Seattle Industrial Association

Pete Hanning, Executive Director
Fremont Chamber of Commerce

Sooz Appel, Owner
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