

August 16, 2011

**Secretary Ray LaHood
U.S. Department of Transportation
Washington, D.C.**

Ray.LaHood@dot.gov

RE: Sound Transit East Link FEIS

Dear Secretary LaHood:

A major shortcoming of the East Link DEIS, SDEIS and FEIS is its purposeful omission of a TSM alternative that compares an optimal all-bus system for East King County to the proposed East Link build alternative.

NEPA requirement

Several contributors to the NEPA East Link environmental scoping in 2006 pressed for inclusion of a strong all-bus alternative. This request was reiterated in comments on the 2008 draft EIS, and in comments on a 2009 supplemental draft EIS.

In response, Sound Transit has refused to include an enhanced all-bus transit system Build alternative for East King County in the Final EIS and the expected Record of Decision. The last response from Sound Transit in the Final EIS (Response to CETA comment EL663-1) is "As no agency has adopted a policy, developed a plan, or identified funding for a high-performance express bus service for the same markets that East Link light rail is designed to serve, the described service is not reasonable and foreseeable and has not been included in the Final EIS." Sound Transit makes reference to earlier screening out of bus alternatives carried out by the agency's consultants during 2005 as part of its Light Rail Master Plan Update released during 2006 prior to the EIS scoping.

The failure to analyze a competitive bus alternative to light rail in the East Link DEIS and FEIS is a breach of the National Environmental Policy Act (NEPA). The NEPA process Section 1502.14 requires that project proponents: "Rigorously explore and objectively evaluate all reasonable alternatives. Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits. Include reasonable alternatives not within the jurisdiction of the lead agency."

East Link LRT – A forced Choice

East Link was force-selected over other HCT alternatives for East King before an EIS process was initiated for the project. As a result Sound Transit ruled out any all-bus TSM alternatives for inclusion in the EIS process.

Sound Transit was created as a regional agency to promote and create a rail transit system for the three-county central Puget Sound region. In 1994 it adopted a 125-mile light rail master plan plus an 80-mile commuter Rail line from Tacoma to Everett. In 1995 its 80+ mile Phase 1 light rail program was rejected by voters. The light rail project was scaled down to a 21-mile “starter rail” line, and a Regional Express bus element was added to gain support of the suburban subareas of the Sound Transit tax area. The regional bus routes were placed on routes that over time would be replaced by extensions of the light rail system. This revised Phase 1 *Sound Move* program was adopted by voters in 1996.

In 2006 Sound Transit updated its long range regional transit plan. It devised ways to show light rail as the preferred transit mode alternative (that is its mission) and reconfirmed the 125-mile light rail system, plus further extensions, that would totally replace its Regional Express bus system. The PSRC included this LRT master plan in its subsequent MTP update since it had no other agency than the Sound Transit rail agency to look to for regional transit plans.

In a 2005 Issue Paper E-1 and its supplemental papers, Sound Transit forced a choice of LRT over the other system alternatives based on transit ridership on the I-90 trans-lake bridge crossing and the way it constructed the non-LRT alternatives. The only all-bus transit system alternative evaluated was termed the HOV/BRT alternative. Rather than constructing a bus system that could operate both on and off available priority transit/HOV facilities, Sound Transit devised a system that forced BRT to emulate LRT – operating only on exclusive BRT guideways with stations fed by local transit and park-ride access, and with BRT buses making stops at all stations (no skip stops for buses when full). To escalate the capital cost estimate of the HOV/BRT alternative, the alternative included multi-\$billion rebuilds of the SR-520 and I-90 interchanges with I-405 to provide freeway-to-freeway transit/HOV ramp systems.

As to ST’s claim that LRT would serve 60% more riders on the I-90 corridor than the HOV/LRT alternative, ST’s own Expert review Panel as well as many others severely criticized that finding because it did not show transit use on both trans-lake bridges. By Public Disclosure request Maclsaac obtained from Sound transit its 2030 total systemwide transit estimates together with estimates on both bridges. The estimates obtained from ST are highlighted in yellow on the following exhibit. Maclsaac prepared the combined bridge estimates in the bottom table.

The difference in systemwide transit ridership among alternatives (top table) is statistically insignificant – less than +/- 1% from systems average. Due to forced emulation of LRT for the other system alternatives, the transfer rate increased from 1.37 under No ST2 action to 1.59 average among the five alternatives. For the two bridges trans-lake transit usage today is about 60% via SR-520 (even without transit/HOV lanes on the bridge) and 40% via I-90. The HOV/LRT alternative generally maintained that ratio – the minimum time O-D patterns for trans-lake trips. The way the LRT alternative was coded for East Link, East Link forced more than a complete reversal of bridge use by transit – to 30%/70%. That is why LRT showed a far superior use of the I-90 corridor compared to the other alternatives. Though faulted by its own ERP, Sound Transit never did publish transit use estimates for both bridges in any of its supplemental papers.

See: http://www.soundtransit.org/documents/pdf/projects/seis/1_I-90_East%20King%20County%20High%20Capacity%20transit%20Analysis%20-%20.pdf

2030 Total Daily Transit Ridership – Five East King System Alts

Scenario	Total Linked Trips	Boardings Local Bus	Boardings HCT ¹	Total Boardings	Transfer Ratio
HOV/BRT	653,700	680,600	346,400	1,027,000	1.57
Busway/BRT	654,400	677,400	368,500	1,045,900	1.60
LRT	658,000	648,000	387,600	1,035,600	1.57
Monorail	650,100	664,500	368,500	1,033,000	1.59
RC BRT	652,600	663,800	379,000	1,042,800	1.60

¹ Includes Regional Express Bus boardings.

Source: Sound Transit, supplement to Issue Paper E-1: I-90/East King County High Capacity Transit Analysis, March 2005.

2030 Transit Ridership on I-90 Across Lake Washington

	Total Daily		Pk Hour, Pk Direction		
	4-Lane SR-520	6-Lane SR-520	4-Lane SR-520	6-Lane SR-520	
	HOV/BRT	38,800	29,500	3,700	
Busway/BRT	37,900	29,400	3,700	2,900	
LRT	58,800	51,500	5,500	4,500	70%
Monorail	43,200	35,600	4,200	3,200	
RC BRT	47,400	39,400	4,600	3,600	

2030 Transit Ridership on SR-520 Across Lake Washington

	Total Daily		Pk Hour, Pk Direction		
	4-Lane SR-520	6-Lane SR-520	4-Lane SR-520	6-Lane SR-520	
	HOV/BRT	24,000	39,500	2,200	
Busway/BRT	25,900	41,000	2,300	3,800	
LRT	9,100	18,600	700	1,900	30%
Monorail	16,700	28,600	1,400	2,800	
RC BRT	15,000	26,900	1,200	2,600	

Data as supplied by Paul Matsuoka on request

1800 Rider Shift

2030 Transit Ridership on Both Bridges Combined

	Total Daily		Pk Hour, Pk Direction		LRT AM Pk Hr
	4-Lane SR-520	6-Lane SR-520	4-Lane SR-520	6-Lane SR-520	
	HOV/BRT	62,800	69,000	5,900	
Busway/BRT	63,800	70,400	6,000	6,700	6,400
LRT	67,900	70,100	6,200	6,400	70,100
Monorail	59,900	64,200	5,600	6,000	3,150
RC BRT	62,400	66,300	5,800	6,200	33%

Source: Sound Transit, Presentation to ERP on April 3, 2005.

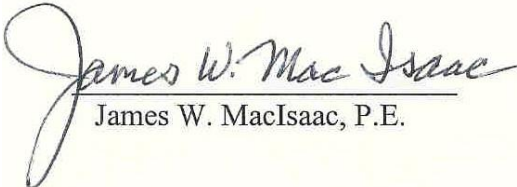
In summary, LRT was selected as the preferred alternative for the Eastside HCT system over the bus alternative by forcing the bus alternative to emulate LRT operations, focusing only on the forced shift of trans-lake transit ridership to the I-90 corridor with the LRT alternative, and assuming major multi-\$billion rebuilds of the I-90 and SR-520 interchanges with I-405 to add Transit/HOV ramp systems for the HOV/BRT alternative. The Issue Papers had little public exposure without comment periods. ST unilaterally (with support of East King rail-seeking elected officials) selected the LRT alternative for East King and forced the PSRC to include it in its MTP without focused public input on the lack of alternatives to East Link.

Today the Puget Sound region has one of the most successful bus transit systems in the country. Express buses perform their own collection/distribution services then express to destinations via the extensive Transit/HOV lane systems. One ST Express Bus route 550 between downtowns Seattle and Bellevue already provides the primary service of East Link at travel times and frequencies comparable to East Link. Other existing regional bus routes (545, 554 and 555/556) currently provide equal and in some cases better travel times between Seattle and Eastside cities compared to East Link. No attempt was made to simply expand upon the existing regional transit system as a TSM alternative to the expensive East Link project.

Secretary LaHood, we urge you and the FTA and the FHWA to require development and evaluation of a reasonable expansion of the current region's bus transit systems as an alternative to the East Link project, as required by NEPA, before you prepare and issue your RODs.

Thank you for the opportunity to comment.

Sincerely,



James W. MacIsaac, P.E.

MacIsaac has over 45 years of professional transportation engineering experience with the planning of transportation systems in the Puget Sound region, beginning with the Puget Sound Regional Transportation Study (PSRTS) in 1965 – the first ever multi-county computerized land use and transportation study for the region. He served as the most senior transportation engineer with the Puget Sound Council of Governments when it absorbed its regional transportation functions in 1967. He later served with two international transportation consulting firms before forming his own transportation engineering firm which he managed for 20 years before going into individual consulting practice. Before and since retirement in 2003 he has served on technical committees for several regional transportation projects, including extensive monitoring of the Sound Transit regional transit programs.

Cc:

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