

Comments on North Link SEIS From Coalition for Effective Transportation Alternatives (CETA)

By John Niles, Technical Director, CETA

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The following comments on the North Link Draft SEIS are from the technical staff of the Coalition for Effective Transportation Alternatives (CETA). CETA is a pro-transit association of Puget Sound regional citizens who have reached the conclusion from several years of research findings that Central Link Light Rail costs too much, does too little, is dangerous, is inappropriate technology for the central Puget Sound region, and should not be built. There are better alternatives, which CETA has described and disseminated widely in a consensus alternative package posted at www.effectivetransportation.org. The North Link SEIS has not caused CETA members to change this conclusion.

CETA offers the following specific points of concern about the North Link project. We request that all of these points be covered in the Final SEIS document.

1. Sound Transit has promised downtown Seattle interests that closure of the Downtown Seattle Transit Tunnel for reconstruction to accommodate light rail (a requirement for the operation of North Link) will not begin until after the funding for North Link all the way to a northern portal north of the University District is identified and construction is scheduled to begin. See Sound Transit letter to Seattle Chamber of Commerce dated November 26, 2001, affirmed in Sound Transit Resolution R2001-16. Please include discussion of the implications of this commitment in the Finance Chapter of the Final SEIS for North Link.
2. The Sound Transit Board is committed to building Central Link Light Rail from Northgate to S 200th in City of SeaTac. Reflecting this commitment, the SEIS document indicates that the construction of Initial Segment, North Link, and Airport Link may overlap. CETA notes that the September 24, 2003 date on the signature page of the North Link SEIS document implies that Sound Transit and Federal Transit Administration may have previously concealed from Congress and the public the intent to overlap the construction of these segments until the Initial Segment FFGA was executed. Page one of the SEIS implies that it was reviewed and approved by FTA Region 10 prior to September 24, 2003. However, the public release of the North Link SEIS was held off until mid November, well after the execution of the Initial Segment FFGA on October 24, 2003. In between September 24 and October 24, the potential overlap in constructing the three segments, very significantly, was not mentioned in the October 2, 2003 letter from four Sound Transit Board Members to the Administrator of the Federal Transit Administration. This letter detailed Sound Transit's financial situation if revenue were somewhat reduced by I-776. This letter was incorporated by reference into the Full Funding Grant Agreement for Initial Segment executed October 24. In light of the elevated threat to Sound Transit revenue from I-776 implementation resulting from the October 30 Supreme Court affirmation of the Initiative's legality, CETA requests that additional detail be provided in the Final SEIS on how the local sources of funding for Initial Segment, for North Link, and for Airport Link can be sufficient to support overlapping construction. CETA

calculates that Sound Transit's local tax receipts will somehow have to be approximately doubled to build light rail beyond the Initial Segment.

3. Despite Sound Transit's hopes for a less drastic outcome, there is a distinct possibility that the implementation of Initiative 776 could cause Sound Transit's MVET revenue to be zeroed out, with Sound Transit subsequently forced to change the level and timing of its bonding for light rail construction, thus impacting the construction schedule for Initial Segment, North Link, and Airport Link. CETA requests that the impacts of this contingency occurring be discussed in the North Link SEIS.
4. The recommendations of the 2001-02 Link Light Rail Project Review Committee chaired by former Seattle Mayor Charles Royer are pertinent to the North Link project and should be incorporated into SEIS Section 2.8.3. Based on a review of the extensive work on the downtown Seattle to University District segment through 2001, the Royer Committee specifically recommended in writing to the Sound Transit Board on June 27, 2001 to drop further consideration of Capitol Hill tunnel alignments. Contrary to these recommendations, the North Link SEIS returns to examining train tunnels under Capitol Hill. The SEIS work has not found such tunnels any less expensive, despite the goal stated in Section 1.3 of the SEIS to reduce cost and construction risk from the original MOS-1 that crashed and burned in early 2001 after an audit by the USDOT Inspector General. CETA requests that the SEIS include a discussion of the Royer Committee recommendations (which were seconded by the Seattle Chamber of Commerce later in 2001) and provide explicit detail on why Capitol Hill is looking better this time around.
5. The SEIS provides no evidence that North Link light rail has been compared to a strong all-bus alternative, in accordance with FTA and Congressional interest in the cost-effectiveness of rapid bus alternatives to light rail. SEIS Section 2.1, The No-Build Alternative, offers no assumed operations plans or even a description of an express bus service that attempts to emulate North Link Light Rail. Transportation professionals could design a bus-based service to achieve reasonable capacity, travel speed, reliability, and geographic coverage of the North Link corridor, yielding strong ridership commensurate with cost-effective levels of investment. There is no evidence presented for the statement made on SEIS page 6-2, "The [light rail] system would be very reliable compared to bus transit on increasingly congested freeways and streets, providing travel time savings for transit riders compared to No-Build." Given the threats to the funding of North Link, a strong all-bus alternative is essential to describe, in addition to being an FTA requirement. Please do so.
6. North Link would increase the number of light rail trains per day and per peak hour in the Initial Segment, a segment which includes 23 at-grade road crossings where train tracks intersect the roadway for buses, cars, or trucks: two in the DSTT, three on the E-3 Busway, and 18 in the Rainier Valley. North Link would also cause the length, weight, and stopping distance of trains to increase as the number of cars in the trains is increased from two to four. Based on recent research, CETA judges the 1999 Link Final EIS analysis of at-grade crossings to be inadequate, and now asserts that Link Initial Segment's four mile alignment along Martin Luther King, Jr. Way to be a Category 1C safety hazard, as that Category is described by published guidelines from FTA, APTA, and Volpe Transportation Center. With North Link proposed to increase the number and length of light rail trains going through crossings in the

Initial Segment, CETA urges that the increased level of hazard at the Initial Segment grade crossings be specifically addressed as an environmental impact of North Link.

7. North Link would increase the number of trains mixing with buses in the DSTT section of the Initial Segment, and thus be a source of more bus flow interference in high temp peak period operations for many hours of the day. This underground intermodal complexity – a Sound Transit invention unique to the planet – would degrade the regional bus service that uses this facility. CETA requests that the impact of more light rail trains in changing the speed and reliability of regional bus service now in the DSTT be specifically addressed in the North Link SEIS.
8. The 1996 Sound Move Plan, Appendix C, Table 8 described \$20-30 million (1995 dollars) annual benefit regionwide from local bus service redeployment resulting from the addition of Sound Transit services. Obviously, some of this benefit would be expected to be achieved from North Link light rail trains. There would be community environmental impacts from bus service redeployment caused by new train service. Please provide a description of these impacts.
9. Initial Segment is officially forecast to attract just 16,000 total new one-way transit rider all day long in the I-5 corridor, where more than 20 times that number of person trips move along that corridor in just the daily peak periods, according to the *Destination 2030* Metropolitan Transportation Plan from Puget Sound Regional Council (PSRC), our MPO. With North Link light rail to Northgate in place in 2010, PSRC has estimated the rail peak period mode share across the Ship Canal would be 6%, while the bus and carpool mode share combined would be 48% (*Destination 2030*, Appendix 8, Table 8-13). Yet all of the North King Subarea spending of Sound Transit must go to light rail under the North Link EIS vision of the future. At the same time there is an officially identified backlog of HOV speed and reliability enhancements published by WSDOT that could be built with Sound Transit's revenue instead of light rail. CETA requests confirmation and comment on this point in the Final SEIS.

CETA's overall conclusion from the Draft SEIS is that North Link, if built, would be an environmental disaster. This conclusion in turn leads inevitably to a similar judgment on Initial Segment, which Sound Transit or higher authority should cancel immediately in order to limit damage and stop the waste that is growing day by day.

Central Link represents billions of dollars spent on the addition of an unnecessary, wasteful transit mode that does far less for sustainable transportation and for improving the environment than alternative uses of the money, such as enhancing the infrastructure for Bus Rapid Transit, Transportation Systems Management, van pools, car pools, and the extension of the Seattle Monorail, as described at www.effective transportation.org, the CETA website.

Some would see Sound Transit's strategy as "you won't dare stop us now that we are digging deep holes." CETA recommends Sound Transit stop digging before the hole gets any deeper.

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