Swift, Lauren NL 383

From: John Niles [NilesGT@compuserve.com]
Sent: Wednesday, November 30, 2005 3:15 PM
To: Irish, James; North Link Environmental
Cc: Maggie Fimia
Subject: CETA comments on North Link SEIS

Attachments: NorthLinkCETA-SEIS.11.05.pdf; CETAattach1-SR-509EISmaps.pdf; CETA-NorthLinkDSEIScomment.1.04.PDF



NorthLinkCETA-SEIS.11.05.pdf (... CETAattach1-SR-509EISmaps.pdf ... CETA-NorthLinkDSEIScomment.1.0...

Dear Jim:

Attached is a comment submission from CETA on the North Link draft SEIS of October. The second file attached is an Attachment to the comment letter.
The third file attached is the CETA comment submission on the November 2003 draft SEIS, which we also want taken into account in the Final SEIS for North Link.

Please acknowledge receipt of this email.

Regards,

John Niles
Technical Chair
CETA
jniles@alum.mit.edu

CETA Coalition for Effective Transportation Alternatives

November 30, 2005

Email attachment to NL 383
John Niles

Mr. James Irish, Link Environmental Manager
Sound Transit
Union Station
Seattle, WA
(via email to northlinkenvironmental@soundtransit.org; cc irishj@soundtransit.org)

In re: CETA Comments on the North Link Draft SEIS of October 2005

CETA requests that the published final version of the North Link Final EIS contain descriptions that meet all of the following specifications. The Final EIS should:

1. Provide ridership forecasts for North Link that come from the very latest available version of the Sound Transit Ridership Forecasting Model, and a statement of assurance that this is the case. 1

2. Provide a description of any differences in the mode choice component (structure and coefficients) of the Sound Transit ridership forecasting model in comparison to the mode choice component in the version of the latest PSRC travel demand forecasting model operational as of January 2006. CETA seeks assurance that the very latest PSRC regional research results for transit mode choice modeling are being used by Sound Transit. 2

3. Provide complete descriptions of the bus deployment assumptions for the build and no-build alternative scenarios modeled to obtain transit ridership forecasts, including a specific focus on the differences in HCT feeder, local, and express bus deployment between the build and no-build scenarios. CETA understands that 2030 bus deployment decisions have not been made, but what are the modeled assumptions in 2030 bus deployment for the build and no build? CETA further understands that the no-build deployment of 2030 buses should be optimized for maximum transit benefit given that no train is present, so the no-build deployment should incorporate BRT principles. 3

4. Provide a safety and traffic impact analysis of 4.6 minute passenger train headways in each direction along four miles of at-grade track in Southeast Seattle, and of 2.4 minute passenger train headways in each direction across three gated grade crossings of truck routes in SODO. These specified light rail operational headways on the Initial Segment stem directly from the operation of North Link, and have never been adequately analyzed to date for safety and at-grade cross-traffic implications. The 1999 Link "Final" EIS Transportation Technical Report analyzed five-minute minimum train headways with 90 foot long light rail cars in two car trains. It's not clear that 380 foot train lengths (four 95-foot cars) now specified for 2030 operation have ever been analyzed for operational impacts. 4

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5. Provide a clear statement of the emergency stopping distance for a four car Link light rail train going 35 mph on wet track, a critical specification for 2030 North Link originating trains in Southeast Seattle. Sound Transit Board Member Ron Sims was quoted by the *Seattle Post Intelligencer* on August 13, 1999 saying "he understands how light rail trains on surface streets could be disruptive. 'Southeast Seattle people don't want to be overwhelmed,' he said yesterday, noting that no other transit system in the country has 360-foot-long trains going down the middle of a major thoroughfare every six minutes, as is planned by Sound Transit." In fact, the Sound Transit long-run plan following completion of North Link is for 380 foot trains every 4.6 minutes. This operating scenario stemming directly from North Link completion has never been analyzed in any EIS to date. 5

6. Provide a description of the planned insertions, removals, and timing of operation of the two Tunnel Boring Machines (TBMs) that are planned to be used to bore the Capitol Hill tunnel for University Link. 6

7. Provide a description of Sound Transit's intention for the use of the Beacon Hill TBM, and the environmental impacts of moving that machine from a Beacon Hill portal to the planned first insertion site for North Link tunnel construction. 7

8. Provide a refined and up-to-date estimates of the quantity of tunnel spoils to be removed through each of the following station construction sites: Capitol Hill, Husky Stadium, Brooklyn, Roosevelt, and the north portal. Also, provide an explanation of why tunnel spoils from behind the TBM are not planned for removal at the Pine Street access point to North Link tunnel construction. 8

9. Provide an analysis on the pay back length of time on the energy investment of 17.4 trillion BTU needed to construct North Link, as stated in the environmental record. CETA calculates the pay back on this investment from the net energy conserved by people riding the North Link train to be approximately 87 years. Describe how this pattern of energy consumption over the coming decades relates to the City of Seattle's public policy intent to make a zero net contribution to global warming. 9

10. Provide a description of any risks to the integrity of I-5 in the planned mined undercrossing of that freeway by the North Link tunnel near Pine Street. Alternatively, provide a clear statement that there are no risks to the structural integrity of I-5. 10

11. Provide a statement of the most likely locations for the disposal of tunnel spoils and/or a description of the specifications/limitations on where the spoils will be permitted to be dumped. For example, CETA assumes that the tunnel spoils will not be dumped in National and State Parks, in protected wetlands and rivers, or in Puget Sound. What are the other limitations for the disposal of spoils known at this time to Sound Transit? Are the spoils likely or unlikely to be disposed of within the 11

boundaries of the RTA taxing district? What is the permissible geographic range of potential dumping sites? 11 cont.

12. Include maps that reflect traffic volumes and LOS of all freeway segments, arterial segments, access street segments and intersections in the vicinity of the North Link light rail stations for both the build and no-build scenarios in 2030, analogous to those maps that were provided in the EIS for the SR-509 extension, as attached. 12

13. Provide a description of the traffic impacts of a long-term northern terminus for Central Link at Husky Stadium, a genuine possibility until such time as Sound Transit taxes are raised to pay for completion of North Link to a Northgate terminus. 13

14. Include maps that reflect traffic volumes and LOS (level of service) of all freeway segments, arterial segments, access street segments and intersections in the vicinity of the North Link light rail stations for the period of years of the most intense construction at the stations, again analogous to the maps in the attachment. 14

15. Provide an up-to-date estimate of the impact of North Link revenue operations between Northgate and South 200th on vehicle traffic volumes and congestion levels on I-5 within King County. This would be an update to the analysis of I-5 traffic and congestion impacts provided in the 1999 EIS Transportation Technical Report that stated that Central Link operation would make no measurable difference. Has that assessment from 1999 changed? 15

16. Provide a statement that describes what parts of the 1999 EIS Transportation Technical Report are still valid, and which parts have been superseded by new information in the Supplemental EIS documents issued since that first Technical Report. 16

17. Provide a description of all funding and financing assumptions and decisions that have been made by Sound Transit for North Link up to the Final North Link SEIS publication deadline. 17

18. Provide a follow up on the comments in the November 2003 Draft EIS on the status of the I-776 legal case now before the State Supreme Court and the implications for Sound Transit's North Link funding plan if the MVET is ordered to be reduced. What is the back-up plan? 18

19. Provide a complete incorporation of scheduling and construction details that have been incorporated in Sound Transit's August 2005 FFGA New Starts application submission to the Federal Transit Administration of the University Link portion of North Link. 19

20. Provide a status report on the negotiations with University of Washington relevant to the timely construction of North Link to the specifications and plans in the various 20

SEIS documents to date. Please list all remaining open issues as of the publication of the Final North Link SEIS: On June 9, 2005, U of W staff told a committee of the Regents, "UW has consistently told ST an interim terminus south of NE 45th is unacceptable" 20 cont.

21. Incorporate all technical support documents for the North Link EIS on the CD-ROM version of the published Final SEIS, in particular but not limited to, the North Link Transportation Technical Report of November 2003, and if still pertinent, the 1999 Transportation Technical Report that accompanied the original Central Link EIS. 21

22. Incorporate in the CD-ROM version all sections of the 1999 Central Link EIS that are still current at the point in time when the new North Link Final SEIS is issued. 22

CETA further reaffirms and requests a complete response to our comments made in January 30, 2004 on the November 2003 draft SEIS for North Link, attached. 23

CETA declares that all of the above requested details are important to informed decision making on whether FTA should issue a Record of Decision, whether FTA should award New Starts grant-in-aid funding, and whether the Sound Transit Board should authorize the construction of University Link.

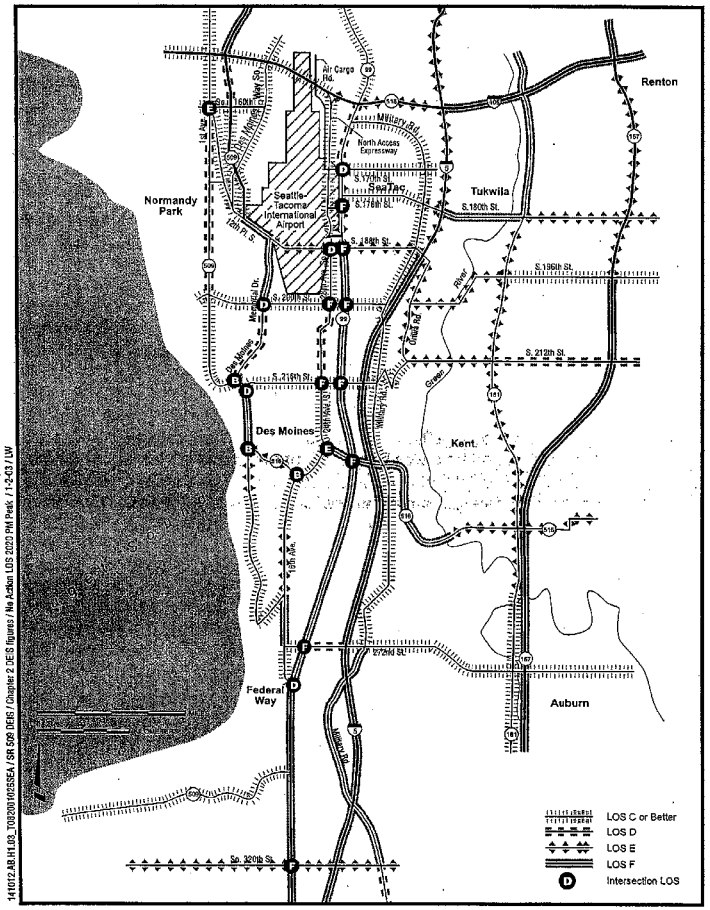
CETA further commends and endorses the separate comments on the North Link DSEIS sent to Sound Transit by Bellevue citizen and professional transportation engineer Jim MacIsaac.

Respectfully,

John S. Niles

John S. Niles
CETA Technical Chair
206-781-4475
jniles@alum.mit.edu

Attachment: Two example traffic maps in one pdf for a different build and no build comparison
Attachment: CETA comments in a pdf on previous North Link DSEIS in January 2004



Note: Roadway level of service displayed is for travel direction with highest volume.

FIGURE 2.4-3
No Action Level of Service 2020 PM Peak Hour
SR 509: Corridor Completion/I-5/South Access Road
Environmental Impact Statement

NL 383 CETA – John Niles

NL 383-1

Sound Transit strives to maintain a state-of-the-art transit ridership forecasting model by continually updating the model. Sound Transit has developed an updated version of its ridership model, which uses 2004 as a base year, for use in preparing ridership forecasts for its Phase II projects. This version of the model is currently under review by an expert review panel, and Phase II ridership forecasts are still being refined. Ridership forecasts for the North Link EIS were prepared using the then-current ridership model, which uses 1999 as a base year. Sound Transit has compared forecasts for the North Link Preferred Alternative using both the 1999-base and 2004-base versions of the ridership model and found the results from the two versions to be very similar and any differences do not substantially change the analysis of impacts in the SEIS.

NL 383-2

The PSRC updates its regional transportation forecasting model to keep it current with regional changes. The PSRC is currently refining a new version of its model that uses updated time and cost coefficients, which are slightly different than the coefficients used in the 1999-base version of the Sound Transit ridership forecasting model. Sound Transit has adopted the updated PSRC coefficients for the 2004-base version of its model; however, this change has not resulted in major changes in the transit ridership forecast for North Link (see response to comment NL-383-1).

NL 383-3

Sound Transit developed the Baseline and Build transit service networks for North Link ridership forecasting in cooperation with King County Metro (KCM), because KCM operates the vast majority of bus transit service that serves the North Link corridor. The Baseline network is designed to maximize the benefits of bus transit within expected financial constraints, and therefore does not assume any major capital investments in new technologies, roadways, etc.

For North Link Build ridership forecasting, the light rail capital investment is added to the transit service network, and bus transit service that is replaced by light rail is removed from the network. The bus service capacity that is freed up by elimination of some bus routes is reassigned in the network, generally as bus feeder service for light rail.

NL 383-4

As described in Section 2.4.4 of this Final SEIS, Link light rail from Northgate to S. 200th Street, which includes the Southeast Seattle segment, would operate with 6 minute train headways in 2015 and 5 minute train headways in 2030. The operating plan analyzed in the 1999 FEIS for Southeast Seattle was 5 minute headways in the 2020 forecast year. Up to 4-car trains are considered for North Link and were considered in the 1999 FEIS for Central Link.

NL 383-5

Sound Transit's specifications to the vehicle manufacturer include braking rate performance requirements of 3 miles per hour per second. A four-car train would be less affected by slides than a shorter train. Traffic safety in southeast Seattle is not part of North Link and was analyzed in the 1999 Central Link EIS in Section 3.3.2.

NL 383-6

The design for the Preferred Alternative includes an approach to construction of the Capitol Hill tunnel if this alternative is selected as the project to be built. This approach would launch the tunnel boring machines (TBMs) from the University of Washington Station south to the Capitol Hill Station. Support (spoils removal, supply of materials etc.) for the TBMs would be at the University of Washington Station staging area. The first TBM would launch about 17 months after the start of construction. The second TBM would launch about 2 to 3 months after the first TBM. The total duration of tunnel boring between the University of Washington Station and Capitol Hill Station is estimated to be 14 to 17 months. After the TBMs reach the Capitol Hill Station the support activities would move to the Capitol Hill staging area as the TBMs proceed to connect with the Initial Segment at Pine Street.

NL 383-7

There are no plans to use the Beacon Hill tunnel boring machine (TBM) for North Link tunnel construction. The machine used at Beacon Hill is owned by the contractor, not Sound Transit. Therefore, it is not Sound Transit's decision to reuse the machine. Transporting a TBM from the manufacturer to a jobsite is the responsibility of the contractor who will be required to follow all applicable regulations. The SEIS evaluates construction truck traffic in Section 4.17.

NL 383-8

The estimates of tunnel spoils provided by the in 2003 Draft SEIS remain accurate, but have been updated for the Final SEIS. Some spoils removal could occur at the Pine Street site, as discussed in the Final SEIS in Section 4.17. The current plan for direction of the boring is described in response to comment NL 383-6.

NL 383-9

A payback analysis of energy consumed is not required as part of the SEIS. As your comments note, the energy calculations for construction have been disclosed in the Final SEIS, and the energy savings (and lack of regional energy impacts) for the region with the project have also been provided.

NL 383-10

According to independent risk analysis workshops, there is a low probably for moderate risk associated with the undercrossing of I-5. This risk was accounted for in the risk model for the project. WSDOT has reviewed and approved the approach.

NL 383-11

As stated in Section 2.5 of the 2005 Draft SEIS, the 2003 Draft SEIS provides more detail on hauling of spoils. Section 4.17.11 of the 2003 Draft and Final SEIS explains that many factors will determine the methods of disposal. The disposal locations will be determined by the contractor, who will be required to use a facility permitted for such spoils disposal.

NL 383-12

The LOS for each intersection is shown in the tables in Chapter 3 of the SEIS and a graphic presentation of the same information is not necessary.

NL 383-13

The impacts of the terminus at the University of Washington station are discussed in the Final SEIS in Section 3.3, Transportation. See the North Link Final SEIS Transportation Technical Report for additional detail.

NL 383-14

Construction impacts for North Link are discussed in Section 4.17.2 of the Final SEIS. Analysis of construction traffic impacts is qualitative, but is based on reviews of traffic conditions at intersections and calculations of delay that would be caused by construction traffic. With haul trips mainly in the off-peak, delays would typically be less than one minute.

NL 383-15

A transportation technical report was developed for the 2003 Draft SEIS, and has been updated for the Final SEIS. However, the information provided in 1999 remains similar to the effects predicted today.

NL 383-16

The North Link SEIS and its supporting documents provide current and accurate information about the effects of the North Link alternatives as appropriate.

NL 383-17

The 2003 Draft SEIS included a financial analysis in Chapter 5. This analysis has been updated in Chapter 5 of the Final SEIS.

NL 383-18

See response to common comment PP-5.

NL 383-19

It is unclear what scheduling and construction details from the New Starts application to which the commenter refers. The New Starts application provides a schedule for construction that shows construction beginning in the fourth quarter of 2008 and ending with the completion of testing in the third quarter of 2015. This information is consistent with Section 2.5 of the 2005 Draft SEIS. Additional construction and scheduling detail is not included in the New Starts application.

NL 383-20

Sound Transit and the University of Washington plan to enter into an agreement that would address all major issues for construction and operation of the light rail system on the University campus. It is expected that major issues would be resolved by the time this Final SEIS is issued and that an interim terminus station south of 45th Street would be allowed on campus.

NL 383-21

Because the technical reports have a limited audience, they are not generally provided on CD. The documents are available from Sound Transit as hard copies at the cost of printing. The North Link Transportation Technical Report incorporates and updates where necessary the Transportation Technical Report prepared for the Central Link EIS.

NL 383-22

Hard copies of these documents are available at the Sound Transit library or can be obtained for the cost of printing from Sound Transit.

NL 383-23

Comment noted. Please see responses to letter NL 207.

Baldwin, Arleen

NL 207

From: Irish, James
Sent: Monday, February 02, 2004 10:14 AM
To: Baldwin, Arleen
Subject: FW: CETA comments on North Link DSEIS

CETA-SEIStestimony.1
.30.04.PDF...

-----Original Message-----
From: John Niles [mailto:NilesGT@compuserve.com]
Sent: Friday, January 30, 2004 1:26 PM
To: Irish, James
Cc: Swift, Lauren; Maggie Fimia; Ruth Korkowski
Subject: CETA comments on North Link DSEIS

Jim, please acknowledge receipt of timely attached document submission in re North Link DSEIS,

John N
jniles@alum.mit.edu

John Niles
Technical Director, Coalition for Effective Transportation Alternatives (CETA), www.effectivetransportation.org
Research Associate, Mineta Transportation Institute, San Jose State University, www.transweb.sjsu.edu
Co-Founder, Public Interest Transportation Forum, www.globaltelematics.org

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

By John Niles, Technical Director, CETA
January 30, 2004

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. 1

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
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 3

calculates that Sound Transit's local tax receipts will somehow have to be approximately doubled to build light rail beyond the Initial Segment. 3 cont.

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

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

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

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 7

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 cont.

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

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

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. 10

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. 11

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.effectivetransportation.org, the CETA website. 12

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.

CETA contact: John Niles, 4005 20th Ave West, Suite 111, Seattle, WA 98199
206-781-4475, jniles@alum.mit.edu

NL 207 Coalition for Effective Transportation Alternatives/John Niles

NL 207-1

Please see response to common comment PP-1.

NL 207-2

Closure of the DSTT is not required to construct North Link. Please see response to common comment PP-5.

NL 207-3

The planned schedule for North Link has been public information since commencement of the North Link study in 2001. The Financial Analysis chapter of the Draft and Final SEIS describe Sound Transit's financial plan for the North King County sub-area, including commitments to other projects and local funding sources. North Link must be funded from the North King County sub-area because it is located entirely within this sub-area.

The Link light rail Initial Segment is fully funded and under construction. It does not depend on additional revenue beyond those already authorized in 1996 by *Sound Move*. The North Link segment from downtown Seattle to the University District is also funded by *Sound Move* and no additional tax revenue is necessary. Extending Link light rail from the University District to Northgate was not funded by *Sound Move* and would require additional funding sources as described in the Financial Analysis chapter of the 2003 Draft SEIS and Final SEIS.

The Airport Link project is located in the South King County sub-area and uses funds from that sub-area. Airport Link from the Initial Segment southern terminus to the Airport/SeaTac Station is also funded and scheduled to open in 2009. Funding to construct Airport Link to South 200th Street has not been identified at this time.

See response to common comment PP-5.

NL 207-4

See response to common comment PP-5.

NL 207-5

The Royer Committee made a number of recommendations and these were considered by the Sound Transit Board in moving forward with the North Link Light Rail Project. The relative cost of the alternatives is presented in the Financial Analysis Chapter of the SEIS. The cost comparison shows that there are alternatives serving Capitol Hill that are less expensive than the original project, represented by Alternative B1.A in this SEIS. Similarly, Chapter 6, Evaluation of Alternatives, in the SEIS provides a discussion of construction risk which indicates that some of the alternatives serving Capitol Hill reduce construction risk compared to the original project (Alternative B1.A).

NL 207-6

See response to comment NL 207-1. The No-Build alternative was described on page 2-1, and Appendix K of the 2003 Draft SEIS provided more detail about the land use and transportation system assumptions

of No-Build. The No-Build alternative incorporates continued expansion of bus systems and service levels.

NL 207-7

A discussion of safety impacts in downtown and south Seattle (including along MLK Jr. Way S.) is provided in the Central Link Final EIS. That EIS looked at the Link light rail system from Northgate to S. 200th Street. The North Link SEIS is a supplement to the Central Link Final EIS. The Central Link Final EIS includes headways at the same level assumed for North Link, and thus covers the range of impacts that would occur under North Link throughout the entire Central Link light rail system corridor. The Central Link Final EIS (page 3-59) offers the following conclusions about safety in Segment D (S. McClellan Street to Boeing Access Road): "Prohibition of mid-block left turns included in the Link at-grade alternatives would help make MLK Jr. Way S. a safer street by reducing collisions between motor vehicles and between pedestrians and motor vehicles. At-grade median light rail systems improve safety by separating opposing traffic, providing for safe turn movements, and providing additional signalized pedestrian crossings."

NL 207-8

As the frequency of trains in the DSTT increases the number of buses would decrease as discussed in Chapter 3 of the SEIS. These issues were previously addressed in the Initial Segment EA in 2001, which included evaluation of DSTT operations for the Initial Segment alone and with the full system. The frequency of light rail vehicles in the DSTT with North Link remains within the operating assumptions used for the Initial Segment, and additional analysis is not required.

NL 207-9

The traffic analysis reflects future bus service integration at light rail stations. Sound Transit does not anticipate that the redeployment of bus service would be a notable source of increased impacts to people or the environment. Redeployment is anticipated to be a benefit, because it will improve transit service levels. Related environmental benefits from increased transit use and lower levels of driving would also be expected. As noted in the 2003 Draft SEIS Section 3.3, the service provider makes redeployment decisions, in this case King County Metro. It is anticipated that service would occur in areas where service is already provided but service levels are low, and along arterial or collector streets.

NL 207-10

Please see response to comment NL 207-1.

NL 207-11

Your opposition to light rail is noted. However, Sound Transit believes that the North Link SEIS identifies the level of environmental impacts, and the analysis of the proposed project does not support your conclusion.

NL 207-12

Please see response to comment NL 207-1.