

Public Interest Transportation Forum - <http://www.bettertransport.info/pitf>

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Testimony for the Public Record of the Sound Transit  
Board of Directors, December 20, 2012 Meeting:

**Souder North as  
described in the 2013  
Sound Transit Annual  
Budget and Service  
Improvement Plan violates  
RCW commuter rail cost-  
effectiveness  
requirements**

by John Niles, citizen of Seattle, and posted for the public  
with hot links to reference material at  
<http://www.bettertransport.info/pitf/SouderNorthInput.htm>,  
a web page in the Public Interest Transportation Forum

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**Summary**

**The Souder North train is illegal, because RCW 81.104.120 allows Sound Transit to provide commuter rail service only when “costs per mile, including costs of trackage, equipment, maintenance, operations, and administration are equal to or less than comparable bus...”**

**Sound Transit’s own operating data and budget information show that costs for Souder North service far exceed the cost for comparable bus**

**service. Therefore the Sounder North service is in violation of the RCW.**

**Sound Transit should either discontinue Sounder North service, or explain why the State law that was obeyed by the agency in 1994 is not obeyed now.**

**The recent mudslide that derailed a moving BNSF train highlights the risk of continued Sounder North operation in defiance of the law.**

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The Sounder North commuter rail service between Seattle and Everett is proposed by Sound Transit to be maintained in its present form in both the 2013 Budget and the 2013 Service Implementation Plan. The following comments are directed to the Sound Transit Board of Directors in connection with the Public Hearing requirement for both documents. As a Seattle resident and informed citizen of the Sound Transit taxing district, I have been following the development of Sound Transit's mass transit system since the early 1990s. My testimony here is informed by the September 20, 2012 report of the Citizen Oversight Panel (COP) North Shore Alternatives Task Force.

**The public interest in safe and efficient public transportation points unambiguously to the conclusion that Sounder North service should be discontinued and the resources shifted to more cost-effective and convenient Regional Express Bus service. Two facts support this conclusion: First, Sounder North costs are so high relative to its modest ridership that the service is clearly illegal under state law. Second, the existing Regional Express Bus service on managed HOV lanes, expanded to improve headways and reduce crowding, can easily serve the same travel market more reliably and efficiently.**

According to the COP report, the Sounder North train service costs about \$9.1 million per year to serve a range of 1,100 to 1,200 one-way riders per day. The cost per boarding in 2011 as reported by COP was \$32.38, not including capital costs. At the same time, a frequent, all-day express bus service from the same agency covers the same corridor and the same intermediate stops with a similar travel time along the I-5 HOV lanes, and a much lower operating cost of about \$5.11 per boarding.

In the first half of 2012, the ridership averaged 1,013 per day. The forecast made in 1996 for daily ridership in 2010 was 2,400 to 3,200 boardings daily, and it was on the basis of this predicted ridership that the train was established. Sounder North ridership in October 2012 was

the train was established. Sounder North ridership in October 2012 was reported to be 1,304 per day.

Occasional mudslides creating 48 hour service cancellations add to the inefficiency of Sounder North as trains sit idle for safety reasons. **Worse than inefficient would be a mudslide hitting a passenger train, even a lightly loaded Sounder North train. On Monday December 17 a mudslide occurred when a train was going by and stopped it from going further, derailing seven rail cars.** Fortunately, this train was a freight train, not a Sounder passenger train, and nobody was injured. YouTube has a video with over 14,000 views of this mudslide event which played on three national network news programs the evening of December 18: [http://www.youtube.com/watch?v=UeT0m-hpD\\_4](http://www.youtube.com/watch?v=UeT0m-hpD_4). Mudslides and washouts of the track can cause derailments even if they do not strike the train while it is moving.

To set the legal basis for operating commuter rail in Washington State, the Legislature and Governor in 1990 established a framework codified as [RCW 81.104.120](#). This law states, "Transit agencies and regional transit authorities may operate or contract for commuter rail service where it is deemed to be a reasonable alternative transit mode. A reasonable alternative is one whose passenger costs per mile, including costs of trackage, equipment, maintenance, operations, and administration are equal to or less than comparable bus, entrained bus, trolley, or personal rapid transit systems."

**In simple terms, the law states that the train must be less expensive than using buses.**

The minimum current passenger cost per mile can be approximated as the \$32.38 cost per passenger boarding noted above divided by the 35 mile route length, that is, 93 cents per passenger mile. This would come out higher if we took into account that many passengers board/exit at Edmonds or Mukilteo and thus travel less than 35 miles, certainly raising the per passenger mile cost to over a dollar. **The cost per passenger mile also would come out much higher if hundreds of millions of dollars in capital costs to be amortized were included.** However, let's assume 93 cents, because this train costs way too much even at this level.

The determination that the RCW 81.104.120 law requires is whether 93 cents per passenger mile is equal or less than riding a bus on the same route. We can show that the train cost is much higher than the bus cost.

In the [2013 Draft Service Implementation Plan](#), page 31, Sound Transit has reported the cost per boarding of its Regional Express Route 510

bus between Everett Station and downtown Seattle is \$5.11 on weekdays. When divided by the same 35 route miles, the cost per passenger mile calculates to 15 cents per passenger mile, or 84% less than the Sounder train.

While our analysis makes an assumption that all the train passengers travel between Everett and Seattle, more detailed data would show a similar result if the Edmonds and Mukilteo customers were considered separately. These cities are also served by bus service to downtown Seattle that can be adjusted to be functionally equivalent to train service by using a small amount of redirected Sounder North funds after this train is stopped.

The historical record of the implementation of [1994 Resolution 24](#) of the Regional Transit Authority indicates that Sounder North train was expected before service began to operate at a passenger mile cost of 33 to 38 cents, which even incorporated capital costs. This was based on a plan to attract 4,600 boardings per day. Bus costs were stated as 40 cents per passenger mile, with no methodology stated on how this cost was calculated, but undoubtedly including capital costs. Because 38 cents is less than 40 cents, the Sounder North Line train in the 1990s passed the reasonableness test of RCW 81.104.120.

**Now, operating experience should replace assumptions and outdated forecasts.** Sounder North costs are higher than planned in 1994, and the ridership lower.

After a decade of operation since 2003 during which Sound Transit marketing programs have had plenty of time to attract more ridership, the passenger mile cost of the train is *not* equal or less than the bus, but much more. The train is more than 93 cents per passenger mile, and the bus is 15 cents.

Lately Sound Transit is in the process of adding about 100 additional parking spaces in Edmonds to attract more riders to boarding Sounder North at that intermediate station on the line. However, this will raise costs for a small increment in ridership. This increment does not change the calculation of cost per passenger mile significantly and the Sounder North service will continue to be illegal.

Taken together, these facts show beyond any doubt that Sounder North service does not meet the specific requirement set forth in RCW 81.104.120. Sound Transit must therefore discontinue the service and redeploy the resources to better serve Snohomish subarea constituents. Sound Transit's own COP has reported that regional Express Bus service in the Seattle Everett corridor is so well used that passengers have to stand in the aisle.

In conclusion, the Sound Transit Board can and should correct this service inefficiency by redirecting the resources currently expended illegally on Sound North service to far more cost-effective Regional Express Bus service. In addition to demonstrating Sound Transit's compliance with state law, doing so would also lower costs, increase ridership, and reduce risk. This change would be a win-win-win for taxpayers, Sound Transit, and BNSF.

A few elected officials in communities served by Sounder North are on record wanting it to be continued. If the will of these officials is followed and my principle recommendation is not implemented, I have an alternative request for explanatory documentation: **The Sound Transit Board should explain why [RCW 81.104.120 was applied in 1994 with calculations shown as though the requirements of this law mattered](#), and why now in 2012 the law is being ignored.**

Thanks to the Sound Transit Board for careful consideration of this testimony.

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Additional background is posted at  
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