

Borbe, Elma

From: Kriedt, Gary [Gary.Kriedt@kingcounty.gov] **EL 687**
Sent: Wednesday, February 25, 2009 3:59 PM
To: Borbe, Elma; Irish, James
Cc: Taniguchi, Harold; Hodson, Doug; Desmond, Kevin; Jacobson, Jim; Obeso, Victor; Hull, David; Morgan, Kathy
Subject: East Link EIS Comments from KC Metro Transit
Attachments: East Link EIS Comments from KC Metro Transit 2-25-09.pdf

Hi Elma and James -- Attached is a letter from King County Metro Transit on the East Link Draft EIS. I'll walk over a hard copy of this shortly. We'll provide more detailed comments by March 13 for your consideration in the final EIS. Thank you!

Gary Kriedt, Senior Environmental Planner
Metro Transit
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Seattle, WA 98104-3856
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From: Borbe, Elma [mailto:borbee@soundtransit.org]
Sent: Tuesday, February 24, 2009 4:06 PM
To: Kriedt, Gary
Cc: Irish, James
Subject: FW: comments from County

Hi Gary,

We look forward to King County's formal comments tomorrow, Feb 25th.

I understand that County staff continues to work to submit more detailed comments to us, separately from tomorrow's due date. Can you please make sure that we receive those additional comments in a timely manner? In order for us to properly review these detailed comments, please provide them to us by Friday March 13th.

Thank you,

Elma



King County

Department of Transportation

Metro Transit Division

201 S. Jackson Street

KSC-TR-0431

Seattle, WA 98104-3856

February 25, 2009

Paul Cornish, Project Manager
Sound Transit
Union Station
401 S Jackson St
Seattle, WA 98104-2826

Dear Mr. Cornish:

Thank you for the opportunity to comment on Sound Transit's East Link Draft Environmental Impact Statement (DEIS). Metro was pleased to find that the DEIS presents the information in a thorough, easy-to-read manner. However, we would like to raise a few topics of potential concern: (1) the future of the D2 roadway and its relationship to the future bus network, (2) issues affecting bus service along the Interstate 90 corridor, and (3) the analysis of the effects of tolling. We discuss these topics and others in more detail below.

D2 Roadway and the I-90 Corridor:

The D2 roadway is an important bus transit facility that provides both speed and reliability for I-90 buses traveling through downtown Seattle via the Downtown Seattle Transit Tunnel or on surface streets via Fifth Avenue and Dearborn Street (or Airport Way). The DEIS suggests that the D2 roadway might be used only for light rail, or that it might be designed for joint bus-rail operation. This decision is listed as an "area to be resolved."

The DEIS estimates that without the D2 roadway bus travel times to downtown Seattle would increase by 10 to 12 minutes. We think many Eastside transit users will find this increase in travel time to be unacceptable. Additionally, Fourth Avenue bus service would experience slower trip times due to increased congestion on Fourth Avenue caused by rerouting I-90 buses to the Fourth Avenue off-ramp. These slower trip times may cause even more riders to complain. The final EIS analysis should include a detailed investigation of these issues and offer alternatives other than joint operation of the D2 roadway should joint operation not be feasible. Alternatives that would maintain current bus priority, while mitigating impacts to existing transit service, could include alternative priority pathways for buses or a non-D2 alignment for East Link.

Impacts to riders in the I-90 corridor east of I-405 also warrant further consideration and should be included under Key Environmental Issues in the summary of Alternatives Analysis (Table ES-2). Although Sound Transit's public outreach efforts have been extensive, we understand that they have been limited to areas close to the proposed alignments. Little outreach was targeted at areas that will not be served directly by the East Link light rail transit (LRT), but that would be affected by its design and implementation. Transit riders in those areas are likely to have longer and less reliable trips because of East Link's use of the center roadway and the D-2 roadway.

The final EIS should include analysis of future increases in I-90 cross-lake bus travel times and options that could mitigate potential impacts. Alternatives could include changes to the bus and rail networks and related facilities that would be needed to mitigate adverse impacts to transit users in areas not served by the East Link LRT.

Mercer Island Transit I-90 Access and Egress and direct HOV Access

The current interchange design does not provide direct westbound access to the I-90 high-occupancy vehicle (HOV) lane from 77th Avenue Southeast in Mercer Island. The Washington State Department of Transportation (WSDOT) has also suggested that the eastbound direct HOV off-ramp at 77th Avenue is a problem because of the proximity of the HOV and general-purpose ramps. However, without direct access that would allow buses to both exit and enter I-90 on Mercer Island with little delay, it is King County's position that I-90 buses crossing Lake Washington would not be able to make stops on Mercer Island. This could be feasible after the project is finished as long as Sound Transit continues to operate Regional Express Route 554 to Mercer Island. However, during construction of East Link, the interchange design would affect continued operation of Regional Express Service (Route 550) across the lake. Alternatives to mitigate delays to Route 550 caused by of the interchange design, as well as possible closure of the D2 roadway for retrofit, should be dealt with through construction mitigation activities and phasing of the project.

King County is also concerned that the current design of the westbound Island Crest on-ramp has general-purpose traffic merging into the HOV lane. It is King County's understanding that this merge and resulting conflicts will cause the HOV lane operation to fall below the state's HOV speed standard. This problem would worsen if WSDOT changes HOV lane management to allow single-occupant vehicles to buy their way into the lane through a HOT lane concept. Further analysis of the Mercer Island I-90 access and egress is needed to clarify traffic merging scenarios, and impacts to transit and other high occupant vehicles. This analysis should be included in the final EIS.

Analysis of Affects of Tolling:

The DEIS analyzes the effects of tolling on State Route 520 for 2030, consistent with the SR-520 Bridge Replacement and HOV Project Supplemental Draft EIS, but it does not analyze the effects of tolling in the nearer term, 2020, nor on I-90. Because tolling could have a significant impact on traffic flows, transit ridership and the speed and reliability of bus travel, we believe more analysis of tolling should be provided.

Paul Cornish
February 25, 2009
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With the East Link LRT and a new SR-520 bridge equipped with HOV lanes and tolling, bus routes will provide faster connections between the University District and several markets including downtown Redmond, Overlake, downtown Bellevue, and Kirkland. The speed and reliability of other routes may be underestimated in the DEIS because the analysis of the effect of tolling is limited.

Other Comments

King County has other, more detailed comments and will be forwarding those via letter prior to March 13, 2009 with the understanding that those comments could be considered in the final EIS. Topics include construction impacts, station design/pedestrian linkages, and transit service issues. Metro staff can also provide Sound Transit with service and other data to support additional analyses for the final EIS, if necessary.

Thanks again for the opportunity to comment on this proposal. We look forward to working further with Sound Transit on this important regional transportation project. If you have questions or need clarification related to these comments, please contact David Hull, Supervisor of Service Planning, at 206-263-4734, or via email at david.hull@kingcounty.gov.

Sincerely,



Gary Kriedt
Senior Environmental Planner
Metro Transit Division

cc: Harold S. Taniguchi, Director, Department of Transportation (DOT)
Doug Hodson, Transportation Manager, King County Executive's Office
Kevin Desmond, General Manager, Metro Transit Division, DOT
Jim Jacobson, Deputy General Manager, Metro Transit Division, DOT
Victor Obeso, Manager, Service Development, Metro Transit Division, DOT
David Hull, Supervisor, Service Planning, Service Development, Metro Transit Division,
DOT