

**East Link Draft EIS, Detailed Comments from King County Metro Transit
3/13/09, Supplementary to letter sent February 25, 2009**

The EIS should identify and discuss construction-related or project-related changes in bus service in detail. As part of the project construction there will be impacts to traveltime and routing for various bus route including routes 550 and 554 that ST controls.

Executive Summary

ES-2, fifth bullet, re 2004 MOA: "to provide HCT in the center lanes of I-90 between Bellevue and Seattle as quickly as possible"; although BRT would operate in outside roadway's HOV lanes, implementation of a BRT service to between Bellevue and Seattle, and Issaquah and Seattle would be a feasible option to provide HCT service across I-90 quickly considering that length of time it will take to implement East Link LRT.

ES-2.2, This section should mention increase demand caused by potential tolling of I-90.

ES-5.2, Segment A could have two options: with and without joint operations in the D-2 roadway.

ES-9, Is there a design option for A1 that does not allow joint bus/rail use of D-2? (The text only mentions an option allowing joint use.)

ES-11, Transportation impacts, second paragraph: discussion compares capacity of LRT with average occupancy of freeway lanes; please describe the assumptions used in this analysis.

ES-12, Last paragraph: temporary construction impacts could be substantial to peak transit flow depending upon WSDOT operation of HOV lanes; Bus travels time increases should be compared to current bus travel using the reversible lanes and the D2 roadway.

ES-13, Safety concern about a South Bellevue station if it requires pedestrians to cross a busy street at grade level to go between parking and transit. Even with a signal (presumed to be the reason one is mentioned on ES-15), there are safety concerns.

ES-18, Need to review projected traffic delays at 112 SE; need to identify potential mitigation.

ES-29, Is a 500 stall P&R appropriate given land use plans around the 130th Ave NE station?

ES-32, Picture shows a completely reconfigured OTC and P&R, but text just mentions temporary closure during project construction. TC design shown in picture raises some pedestrian safety concerns.

ES-35, Lack of a station at 51st seems paradoxical, as development density seems higher there than at Overlake Village. Downtown Redmond is described as an urban village, but lacks a station except the one at the Transit Center which appears to be tenuous even with E2. SE Redmond Park station is mentioned, but not shown (with that name) on the maps. On ES-36 the RTC station appears to be discounted due to impacts, but the point of high capacity transit is to serve high density areas where impacts are likely to be high.

ES-46, We are concerned about loss of bus use of D-2, and would be anxious about alternatives and mitigation.

I-90 East Corridor

- The light-rail planning does not include or discuss impacts to transit service east and south of the I-90/I-405 interchange (the “I-90 East” corridor). Over 70 percent of the current a.m. peak hour bus trips on the I-90 bridge are from the I-90 East corridor.
- Though extensive, public outreach was limited to areas near the alignments. ST has not extended their outreach to areas served by routes 111, 114, 212, 214, 215, 216, 218, 225, 229, and 554. Riders of these routes in the peak direction may suffer degraded trips due to East Link LRT taking the center roadway and possibly the D-2 roadway. Riders of the above routes may suffer trips that are longer by eight to 12 minutes as well as less reliable service – public outreach to all affected areas should be undertaken.

Construction Impacts

Please include Metro Transit on the list of agencies (Page v of the Summary Report). Please note the following:

- Bellevue Transit Center would be closed for an extended period (years?) under two of the route alternatives.
- Access to Bellevue Transit Center from 108th Ave. N.E. could be disrupted or temporarily closed under a third alternative.
- South Bellevue Park-and-Ride would be temporarily closed for construction of a 1,475 stall garage.
- Overlake Transit Center would be temporarily closed for construction of the light-rail station.

East Link LRT Ridership Screenline at Lake Washington

The information related to East Link LRT ridership by hour in terms of daily boardings per station in 2020 and 2030 and for the entire alignment could be presented more clearly

Appendix G

G-A24, It isn't clear how/whether there would/could be a connection between a Rainier rail station and southbound Rainier bus service. It is critical to be able to access both sides of Rainier.

G-A26, Rt. 554 terminal on SE 27th needs to accommodate 2 buses simultaneously; it is not clear that it would.

Appendix H

1.0, Introduction: there is no discussion of tolling, let alone dynamic tolling; it would have a huge impact on translake transit flow and the need for the project.

1.2.4

- Potential negative impacts to transit service between Seattle and east I-90 markets are omitted (e.g., Eastgate, Issaquah, Issaquah Highlands, Snoqualmie Ridge, and North Bend).
- Comparison of Link LRT headway with average bus headway is questionable; some No Build bus headways are as tight as LRT; the ones that are not would be the same under both No Build and Build alternatives.

1.2.5, Please clarify why center roadway limited to 5,000 persons per hour. What portion of East Link LRT capacity is forecast to be used by 2020 and 2030?

2.0 Methodology

Table 2-1

A critical performance measure was omitted and should be added: systemwide transit ridership, bus and rail, for all agencies and both translake bridges, not just LRT ridership.

3.0 Regional Travel

3.1, Please note that the transit data that was gathered during the spring 2007 signup was from when the DSTT was closed for the retrofit (between September 2005 and September 2007). At that time, p.m. peak outbound reliability was poor (similar to before the DSTT opened).

The second paragraph could be expanded to discuss the affect of dynamic tolling on traffic congestion. The third paragraph could acknowledge that the links are already provided via bus today.

The travel time comparisons could be expanded to include those under dynamic tolling. Direct bus travel times between downtown Seattle and both downtown Bellevue (550) and Redmond (545) are comparable to the forecast Link LRT times in the midday without congestion: 550 is 25 minutes in peak direction; 545 is 41 to Westlake.

Page 3-3, screenline performance: the descriptions of the screenlines are confusing; for each, the screenline should be described as being perpendicular to the direction of bus travel.

4.0 Transit

Second paragraph: the comparison of Link LRT headway and average bus headway is questionable. In the No Build, routes 212, 231, 271, 255, 545, and 550 have tight headways.

The headings for tables 4-1, 4-2, 4-3, 4-4, and 4-5 could be revised to "Spring 2007" from "Existing".

Table 4-1 shows Spring 2007 bus routes, with the exception of including Route 74 EX in the DSTT; that was not implemented until September 2007.

- IDS: Route 74EX should not be shown for Spring 2007; it was shifted to the DSTT in September 2007;

- BTC: routes 220 and 630 have since been discontinued;
- South Bellevue and MI: Route 942 has been renumbered to "211";
- Bear Creek: routes 251, 266, 922, 540 no longer serve Bear Creek;
- Overlake Village: Route 222 no longer serves it;
- OTC: Route 222 was split; new Route 221 was added; and,
- Redmond TC: was not opened until February 2008; today, routes 220, 249, 254, 922, and 540 no longer serve it.

Table 4-2 shows Spring 2007 bus routes. In September 2007 the DSTT reopened. In February 2008, routes 220 and 254 were deleted and routes 221 and 248 added and routes 540, 545, 222, 233, 238, 249, 249, and 251 were revised. In September 2008, Route 922 was deleted, routes 209, 214, 216, and 929 revised, and Route 215 added. Also, Route 630 has been deleted.

page 4-5, 4.2.2 first paragraph: a passage explains why many routes were not included in the screenlines. However, routes 111, 114, 211, 212, 214, 215, 216, 225, 229, and 545 should have been included. Service frequency LOS excludes one-way peak-only routes. This is a significant portion of the East King County transit network.

page 4-6, reliability: could acknowledge the DSTT closure in spring 2007.

4.2.3:

- The first phase should be amended to read "spring 2007";
- The emphasis on direct no-transfer connections seems odd for a rail system. The No Build should have included 10-minute headway on Route 271 turnback between the University District and BTC.

Page 4-7, first paragraph: in spring 2007, ST Route 540 did provide direct, no-transfer service between downtown Redmond and the University District. That was revised in February 2008. With East Link LRT and a new SR-520 Bridge with HOV lanes and tolling, bus routes will provide faster connections between the University District and several markets listed: downtown Redmond, Overlake, downtown Bellevue, not to mention Kirkland.

4.2.6, this paragraph is discussing the reliability of service measured in spring 2007 with the DSTT closed and downtown Seattle surface streets congested in the peak periods. It is less representative of the current No Build conditions, let alone those with all three phases of R8A. The dynamic tolling of the two translake bridges would significantly improve both the speed and reliability of translake bus routes.

Table 4-4 is missing routes 250, 261, 265, 266, 272, 277, 540

Table 4-3, Spring 2007, screenline information needs to be revised as follows:

- Screenline 1: Route 942 (now Route 211);

- Screenline 2: routes 268 and 545 were included; yet routes 250, 252, 257, 260, 261, 265, 266, 272, 277, and 311 excluded? Of these, routes 250, 265, 261, and 266 serve markets targeted by East Link LRT and routes 252, 257, 272, 277, and 311 serve the Evergreen Point and Montlake freeway stops and handle riders transferring from and to routes in the East Link LRT travel shed. Even if the routes were deleted in the No Build, they were part of the Spring 2007 network.
- Screenline 3: Route 942 (now 211) was omitted; it is on the general purpose lanes of I-90 at that screenline
- Screenline 4: routes 222, 240, and 560 should be included.
- Screenline 5: routes 250, 261, and 272 should be included.
- Screenline 6: routes 250, 265, 266, and 540 should be included.

Table 4-5, Spring 2007:

- Routes 205 and 942 (now 211) should be included in the IDS screenline.
- Routes 204, 213, 942 (now 211) should be included in the MI screenline.
- Routes 222, 243, and 261 should be included in the BTC screenline.
- Routes 222, 233, 250, and 269 should be included in the OTC screenline.
- Routes 233, 249, 251, 254, 265, 266, 268, 269, 540 should be included in the Redmond TC screenline.

Page 4-13, second paragraph.

- Joint bus-rail operation on the D-2 roadway is a major issue. Ridership on routes 111, 114, 210, 212, 214, 216, 218, 225, and 229 should be estimated with and without joint operation.
- Joint bus-rail operation in the DSTT is a major issue. ST assumes joint operation will cease when North Link LRT is extended to Northgate. Is the determination based on Link reaching Northgate or Link headways that determine feasibility of joint operation. If headways remain at least four minutes can joint
- Page 4-13, third paragraph: though Route 205 was deleted in the No Build, easy transfers may be made in the DSTT to and from the University District.

Page 4-23, first paragraph: with tight No Build headways on routes 271, 545, and 550 wait times will not be longer than under the build condition.

Page 4-30, interim termini: note that current fiscal expectations are that East Link LRT will reach OTC and not downtown Redmond, so the lower daily ridership figures are relevant. In addition, if a tunnel option is selected for downtown Bellevue or the floating bridge costs are higher than expected, an even shorter line may be afforded.

Page 4-32, potential mitigation: the signal priority could have little impact, as the arterials will be full of traffic. Tolling would likely be more beneficial and is not mentioned.

