

Puget Sound Public Interest Transportation Forum

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Mr. Harry Saporta, Director
Office of Safety and Security
Federal Transit Administration
Washington, DC
(e-mail transmission)

Dear Mr. Saporta:

In re: Hazards in the Design of the Seattle Regional Light Rail System

As you know, I have written you from time to time on the developing situation with regard to safety of the proposed Seattle Central Link Light Rail Initial Segment. Mr. Ted Uyeno of FTA Region 10 has recently confirmed for me that my concerns do need to be addressed at FTA headquarters level, and has separately requested a contact for me. I'm looking forward to hearing from that individual, but the urgency of the situation motivated this further direct communication without waiting.

After additional review of the Link alignment and published FTA safety guidelines, I believe more than ever that Seattle's light rail is on a path to being built with an unsafe design. Specifically, the light rail vehicle potential for collisions with cars, trucks, and buses certainly falls into American Public Transportation Association (APTA) Hazard Classification 1B or 1C, meaning the likelihood of a fatal accident is "probable" or "occasional" over the life of the system, and therefore "unacceptable" under Federal guidelines. I base this judgment on light rail accident statistics published by Bureau of Transportation Statistics plus a review of reports from Transportation Research Board and Volpe Center.

I appreciate that your staff is probably reviewing the light rail safety and security situation out here in Seattle given the high level of controversy and the unique design features of intermixed bus and rail operations in the existing Downtown Bus Tunnel, as well as at approximately 20 grade-level street crossings in congested urban neighborhoods. Some of these crossings have planned daily exposure factors exceeding two million on the opening day of revenue service. I have attached a map of the 18 Rainier Valley at-grade road crossings.

This contemplated Link Light Rail system is eventually intended to be a "high capacity" transit system serving the region from Everett to Tacoma with four-minute headways during peak periods. The design originally recommended in the 1993 Regional System

Level FEIS was for an exclusive, grade-separated rail right of way, but that was judged to be too expensive. Safety compromises are the result.

A significant gap in safety oversight was revealed in the June 5 broadcast of a meeting of the King County Council Transportation Committee, where Council members reviewed the proposed Downtown Tunnel agreement pending between the County and Sound Transit with regard to Tunnel operations that mix buses and trains on the same guideway. A Sound Transit manager testified that the safety of the design of the Tunnel and its bus and rail combined operations will be a matter of "self-certification" without substantial involvement from the State Fixed Guideway Safety Oversight Office, which is focused primarily on safety of operations once light rail revenue service is underway in 2009. Per regulations, the State Oversight Office is apparently not involved in any sort of independent review and certification of the **safety of the rail system design** anywhere along the alignment.

With this lack of oversight in mind, **I urge that prior to awarding Sound Transit an FFGA that FTA require an *independent* review, analysis, and certification of the safety of the Link Initial Segment design, especially with regard to the many places where rubber-tire vehicles drive over or ride on top of train tracks: the Downtown Bus Tunnel, the E-3 Busway south of the Tunnel, and along Martin Luther King Jr Way in the Rainier Valley.** I believe that the present design of Link Light Rail, as yet unbuilt, would not survive such a review, given the potential for fatal accidents.

Link Light Rail advocates in city and county government and at Sound Transit have already decided that this project is in the public interest and should be built, notwithstanding the problematic non-exclusive right-of-way features mentioned. Therefore, Sound Transit and local government have a conflict of interest with regard to objective certification of a safe design.

Sound Transit officials surely believe that they are building a sufficiently safe system, and they certainly plan to operate whatever they build as safely as possible. However, my point is distinctly different: **Objective examination of safety is warranted during the present qualification of Link Light Rail for Federal funding to make sure that local rail supporters are not underestimating the risks to human life in the underlying design.** It has a high exposure factor for potentially fatal collisions, despite the planned use of signals to try to prevent them.

Amplifying Mr. Uyeno's relay of my concern, I would like to be assured by you that my Federal Government is being sufficiently prudent in its support of Sound Transit's design for light rail. To be clear, based on many considerations that go beyond safety, I do not support the construction of Link light rail and would like to see local resources redirected to more effective and safer forms of public transit. Link Light Rail having an unsafe design (APTA Hazard Classification 1B or 1C) is an additional reason for the Federal Government not to fund its construction, despite the willingness of local officials to bear the environmental cost of fatalities.

Very respectfully,

John S. Niles

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CC: Ted Uyeno, FTA Region 10
CC: Rob McKenna, King County Council Transportation Committee
CC: Chris Johnson, Staff to Councilman Rob McKenna
CC: Stephanie Gupta, House Appropriations Transportation Subcommittee Staff
CC: Sarah Batipps, USDOT Office of Inspector General
CC: Karen Waters, Staff to Senator Patty Murray
CC: David Harrison, Staff to Senator Maria Cantwell

Rainier Valley Link Light Rail Route & Stations

Sound Transit designers have incorporated community comments on the Rainier Valley station designs into their latest work. On this page are some examples of their most recent designs.

Stations designs —
 Edmunds, Othello and Henderson stations: Arai Jackson
 McClellan Station: Otak

For more information, contact Roger Pence, Community Relations Coordinator at 206.398.5465 (pencer@soundtransit.org) or Johnathan Jackson, Project Development Manager, at 206.398.5272 (jacksonj@soundtransit.org). They can be reached by fax at 206.398.5217.

