



January 25, 2005

Steve Kennedy, Senior Environmental Planner
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

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Dear Mr. Kennedy:

With great interest, Pierce Transit's staff has reviewed the Draft Supplemental Environmental Impact Statement to the "Regional Transit Long-Range Plan," dated December 2004. While its development has been a time-consuming process, we firmly believe that your efforts that will pave the way for many essential regional transportation improvements in years to come.

L-010-001 It is our understanding that the public comment process for the long-range plan document itself remains uncertain. While that process is outside the scope of this DSEIS, we are taking this opportunity to request that Pierce Transit be afforded the opportunity to review and comment on proposed changes to Sound Transit's long-range plans, including any issue papers analyzing the plan alternative options, if they have the potential to affect Pierce Transit or its customers.

The following comments are directed towards the draft plan.

L-010-002 1. **General Comment:** The draft plan identifies only one new BRT corridor (Issaquah to Sammamish to Redmond). While we have no comment regarding the appropriateness of this corridor for BRT operation, we do suggest that Sound Transit should insert language into the long-range plan that maintains the flexibility to establish new regional express bus/BRT corridors, when appropriate. Such language simply recognizes that the dynamic growth, which has occurred throughout the region, will continue.

L-010-003 2. **General Comment:** We concur with the identification of new and expanded parking facilities or park-and-ride lots as elements of both the commuter rail and regional express bus components of the Plan Alternative. Given the dispersed land use patterns that are prevalent throughout the region, we believe that the availability of adequate parking will remain an essential component of any successful regional public transportation service. Accordingly, we suggest that the long-range plan clearly state that regional services, including light rail extensions into South King County, will include parking facilities.

L-010-004 3. **Figure 1-3 (Long-Range Plan Alternative) and Page I-20 (South Area Project Listing):** The portion of Route 582 (Bonney Lake-Tacoma Express) between Bonney Lake and Sumner is omitted from the Plan Alternative map and from the listing of projects contained in Table I. The

L-010-001

Sound Transit will provide opportunities to comment on the Long-Range Plan throughout the update process. Some issues will require coordination with local agencies, and Sound Transit is pleased that Pierce Transit plans to provide input. Comments on reference documents (such as Issue Papers prepared by Sound Transit) can be made to Sound Transit, but will not be responded to as part of this SEIS.

L-010-002

The SEIS identifies several additional regional express bus/BRT routes in areas where service has been requested, but does not exclude the possibility for additional regional express bus/BRT routes to be added at a later time. Impacts and benefits of any additional regional express bus routes not specifically identified in the SEIS would be similar to those included in the SEIS.

L-010-003

The current Regional Transit Long-Range Plan identifies the need for transit-supportive capital facilities such as park-and-ride lots. New or expanded parking facilities associated with light rail stations, commuter rail stations, and transit centers are assumed in the Plan Alternative and Options identified in the SEIS. This assumption supports the continued inclusion of parking facilities for Sound Transit patrons in any updates to the Long-Range Plan.

L-010-004

The Sumner to Bonney Lake BRT corridor has been added to Figure 1-3 of the Final SEIS.

- L-010-004** | DSEIS should clarify whether Sound Transit's long-range plans call for the continued operation of this service or for its eventual elimination.
- L-010-005** | 4. **Figures 1-3 and 1-4:** On examination, it is apparent that these two figures identify demand corridors, not specific service alignments. However, this distinction is never drawn within the plan or on the graphics themselves. To avoid confusion, and to ensure future flexibility, we suggest that the long-range plan include language that specifically refers to each alignment as a corridor, and that decisions about the specific routing for new Sound Transit services – light rail, commuter rail and regional express bus – will be made at a later time. In addition, we suggest that map keys be revised to include the word 'corridor' (e.g. 'Light Rail Corridor') and that, as much as possible, the lines depicting corridor alignments be widened on these maps.
- L-010-006** | 5. **Page 3-16 – Regional Express Bus/Bus Rapid Transit (First bullet):** Recognizing that the region's travel patterns will likely continue to evolve, we suggest that this reality be reflected in the long-range plan. Consistent with our first comment, we suggest the adopted long-range plan include the statement, "Additional regional express routes that address significant regional travel patterns may be established in the future."
- L-010-007** | 6. **Page 3-18 – Bus Rapid Transit and Table 3-3:** The draft report is unclear as to the difference between the four corridors/routes that are identified at the end of the first paragraph and the 'potential arterial HOV projects that have been identified in Redmond, Kirkland, Bothell, Woodinville, Renton, along SR 7 and along SR 161. The final plan should either clearly delineate the differences between the two sets of alternatives or merge them into a single list.
- L-010-008** | 7. **Appendix I (Project Listing):** We note that none of the three alternatives considers the construction of maintenance and storage facilities for regional express buses. Whether Sound Transit or local contracting agencies construct these facilities, they entail significant costs that will ultimately be borne by Sound Transit. The DSEIS should recognize this reality in its cost estimates.
- L-010-009** | 8. **Appendix I (South Area Project Listing) Sixth from Last Item on page I-19:** The DSEIS identifies a "SR 99 at 54th Ave. E. Station Parking" facility as part for both the No Action and Plan alternatives. There is no existing Sound Transit facility located near this intersection and we know of no plan to construct any facility at that location as part of Phase 1.
- L-010-010** | 9. **Appendix I (South Area Project Listing) Last Item on page I-19 and Table 4.9-16:** The DSEIS identifies possible extension to Route 564 from its current terminus in Auburn to South Hill as a plan alternative option. Table 4.9-16 does not appear to analyze the impacts of this change, instead reporting projected usage for 'Bus Rapid Transit: Cross-Base/SR161 – Dupont-Puyallup-Federal Way.' We cannot determine whether these two alternative options are related, and if not, whether the projected patronage associated with the Route 564 extension has been calculated.
- L-010-011** | 10. **Appendix I (South Area Project Listing):** One BRT/Express bus alternative that does not appear to be considered in the DSEIS is the provision of direct service between Downtown Tacoma and Bellevue. Recalling that this route was part of the original 'Sound Moves,' Tacoma-Bellevue service should again be considered for possible inclusion in the long-range plan.

L-010-005

The SEIS has been revised to more clearly state that the lines depicting alternatives on Figures 1-3 and 1-4 represent broad corridors as opposed to specific alignments or routes. Specific routing, alignment, and operating scenarios would be evaluated and considered during development of Sound Transit 2 or other future phases of projects. Detailed decisions about individual routes or alignments would be made during project-level environmental review of each project.

L-010-006

We agree with the comment. Language similar to the suggested sentence has been added to the Regional Express Bus/Bus Rapid Transit section in Chapter 3 of the Final SEIS.

L-010-007

There is no difference between the BRT corridors listed in Table 3-3 and the corridors (and arterial improvements) listed under Regional Express Bus/Bus Rapid Transit in Section 3.4.2.2 of the Draft SEIS. This section has been modified to more clearly define the range of options for BRT corridors identified in the SEIS.

L-010-008

The Plan Alternative includes new and expanded maintenance bases as required to support future Sound Transit operations. The potential costs associated with additional bus maintenance facilities required for expanded regional express bus/BRT service would be addressed as part of Sound Transit 2.

L-010-009

This project was erroneously listed as a No Action project in Appendix I, Table I-1. This has been corrected in the Final SEIS Appendix to list the project only as a Plan Alternative project.

L-010-010

The extension of Route 564 to South Hill is included in Appendix I, Table I-1, as a representative modification to existing ST Express bus routes that could be implemented under Sound Transit 2 or another future phase of improvements. Distinct from this modification is another

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L-010-012

11. **Appendix I (South Area Project Listing) Third Item on page I-20:** We note that the Plan Alternative anticipates the elimination of all regional express bus service between Pierce County and SeaTac/Downtown Seattle once light rail service is available. In doing this, Sound Transit should consider how Lakewood and DuPont area residents, who now have all-day access to regional express bus services, will connect with the light rail services, and what the travel time impacts of these changes will be. This issue is partially addressed by Table 4.9-8 but does not specifically consider midday periods, when commuter rail will not operate.

Again, thank you for the opportunity to review and comment of the Draft Supplemental Impact Statement. I hope you will find our comments of value as you move forward towards the adoption of a new long-range plan. We look forward to working with Sound Transit as you plan and implement the Phase 2 expansion.

Sincerely,



Susan Lang
Vice President, Technology and Transit Development

Cc: George Patton
Tim Payne
John Hubbard

regional express bus/BRT route option to provide BRT service between DuPont and Federal Way via S. 176th Street and SR 161. A ridership forecast for this option is shown in Table 4.9-16. However, this table does not show ridership forecasts for all potential route modifications listed in Appendix I, Table I-1.

L-010-011

This project has been added as an option to Appendix I, Table I-1, under the South (King County) Regional Express Bus/BRT section.

L-010-012

Modifications to regional express bus/BRT service between Pierce County and SeaTac or downtown Seattle would be evaluated in more detail as part of Sound Transit 2 or other future phase planning. Any modifications would take into account the extent of other HCT services available such as Link light rail or Sounder commuter rail.