Chapter 7

Public and Agency Comment Summary

7.1 Introduction

This chapter summarizes comments received on the East Link Project Draft Environmental Impact Statement (Draft EIS) and the Supplemental Draft EIS (SDEIS). It is intended to serve as a summary only; it is not intended to address every comment received during the Draft EIS and SDEIS comment periods. All comments received and responses to those comments are included in Appendix J of this Final EIS.

The U.S. Department of Transportation (USDOT) Federal Transit Administration (FTA), the Central Puget Sound Regional Transit Authority (Sound Transit), and Washington State Department of Transportation (WSDOT) published the East Link Project Draft EIS on December 12, 2008. The 75-day extended comment period ended on February 25, 2009. The general public, business groups, organizations, and agencies submitted comments by mail, e-mail, and on comment forms provided by Sound Transit. Oral statements were also recorded during the following five public hearings and open houses:

- Wednesday, January 21, 2009, Old Redmond Schoolhouse Community Center, Redmond
- Thursday, January 22, 2009, Thurgood Marshall Elementary School, Seattle
- Tuesday, January 27, 2009, Community Center at Mercer View, Mercer Island
- Wednesday, January 28, 2009, Bellevue High School, Bellevue
- Thursday, January 29, 2009, Bellevue City Hall, Bellevue

Following this process, the FTA, Sound Transit, and WSDOT published the SDEIS and opened a public comment period for this document between November 12, 2010, and January 10, 2011. Oral statements were recorded on Tuesday, November 30, 2010, at Bellevue City Hall in Bellevue.

This summary provides an overview of the comments received by segment, by public agencies, and by organizations. Table 7-1, located at the end of this chapter, provides a review of common comments and responses.

7.2 Overview of Comments Received

7.2.1 Draft EIS Overview

Sound Transit received 765 comment submittals or individual statements on the Draft EIS during the comment period. The comments covered a wide range of issues and represented viewpoints from residents, property owners, organizations, business groups, businesses, and government agencies. Most comments generally supported East Link but expressed preferences or opposition to specific alternatives. Of the 765 submittals, approximately 170 generally supported or opposed the project and did not advocate or oppose a particular alternative. Most comments came from individuals living, working, or with property interests in the project study area. Most commenters referenced one or more segments of the project area and stated a preference or objection to one or more alternative. Over half of the comments submitted were regarding Segment B (South Bellevue).

Overwhelmingly, transportation issues were the top concern, related to congestion, parking, access limitations, transit ridership, or pedestrian and bicycle issues. Other common issues of concern included noise and vibration, property acquisition and property values, visual effects, land use, neighborhoods, parks, ecosystems, construction, and project financing and cost. Specific suggestions for new alternatives or modifications to the proposed alternatives in the Draft EIS were made in approximately 110 submittals. Approximately 75 submittals included comments that suggested fundamental changes to the East Link Project. Examples of these comments included using different technologies for high-capacity transit (HCT), developing a bus rapid transit system instead of light rail, and providing HCT to the Eastside along different corridors, such as State Route (SR) 520.

The following lists how many comment submittals referenced each segment, summarizes the general comments received from individuals on the segment, describes which segment alternatives received the largest number of supportive comments, and highlights which segment alternatives received the most endorsements from organizations and agencies.

7.2.1.1 Segment A, I-90

Approximately 60 submittals were received, and most of the comments concerned the transportation operations of I-90. Because the East Link Project would convert the center roadway from vehicle operations to an exclusive rail corridor, several comments expressed concern that losing the center roadway would potentially create additional congestion and freight impacts. Even with the additional high-occupancy vehicle (HOV) lanes to be built as part of the I-90 Two-Way Transit and HOV Project, comments listed concerns about how the new HOV lanes will meet traffic flow performance measures. Additionally, several comments questioned how Mercer Island residents would safely weave into and out of the I-90 lanes. Most comments regarding the D2 Roadway supported joint use of bus and light rail on this roadway between Seattle and the Rainier Station.

Concerns about both stations in Segment A focused on adequate parking and spillover on-street parking in adjacent neighborhoods. Several mentioned issues about possible congestion on residential streets and potential pedestrian impacts surrounding stations. Mercer Island preferred the station design with entrances on 77th and 80th rather than with the pedestrian bridge, with the understanding that Sound Transit will work with the City to address park-and-ride capacity. Most comments supported an elevated light rail profile that retains the South-to-West on-ramp, but commenters generally saw less need for the East-to-North off-ramp.

Some comments also suggested analyzing a trans-lake alternative that did not use I-90. Some suggested that commuters would be accommodated in the SR 520 Bridge Replacement and HOV Project.

7.2.1.2 Segment B, South Bellevue

Of the over 400 comment submittals received regarding Segment B, most discussed the BNSF Alternative (B7), with almost 250 supporting this alternative and at least 70 opposing it. Some commenters sent multiple comment submittals. Over 200 commenters referenced transportation concerns in Segment B, more than any other segment. Comments on Segment B generally fell into two categories: those supporting and those opposing the use of the former BNSF Railway corridor.

Those supporting use of the former BNSF Railway corridor also fell into two general categories. The first type of support was oriented toward the ability to extend light rail to the east and south in the future—specifically to Eastgate, Issaquah, and Factoria, which many believe would be easier from this right-of-way. These supporters also felt that use of existing right-of-way would be a better use of money and that crossing Mercer Slough now as part of East Link would ultimately save money, rather than crossing it in the future to expand the light rail system to the east and/or south. Nearby access to I-405 was also cited in many submittals.

The second type of support for use of the former BNSF Railway corridor was based on opposition to running light rail along Bellevue Way SE and/or 112th Avenue SE. Opposition to using these roads generally focused on potential residential and business displacements, noise impacts, visual impacts, increased traffic, and impacts on neighborhood cohesion. Additional concerns include the potential for increased crime, impacts on property values, and impacts on parks. These concerns were related to both construction and operation of the project.

Commenters expressed concern about whether or not construction mitigation proposed with any of the alternatives along Bellevue Way SE was adequate. Another concern was future land use opportunities in this area, as some people believe that all available right-of-way should be preserved for future road widening and others are concerned that upzoning would occur, resulting in increased density around stations. A number of the supportive comments asserted that Alternative B7 is more consistent with the Bellevue Comprehensive Plan, the South Bellevue Subarea Plan, Bellevue Light Rail Best Practices, and the Bellevue Chamber of Commerce. Many commenters opposed to the Bellevue Way SE alternatives also questioned the ridership forecast for Alternative B7 and felt that ridership for this alternative was underestimated. In addition, at least 50 submittals expressed support for a proposal developed by the "Vision Line Coalition," which includes Alternative B7.

Comments that opposed using the former BNSF Railway corridor for Alternative B7 focused on the proximity of residences to this right-of-way, which they believed would result in potential noise impacts, potential impacts on property values, and traffic impacts on 118th Avenue SE. They also referred to the projected low ridership and, therefore, low cost-effectiveness of this alternative. Several comments acknowledged that transit access is not convenient in this area and that there are limited opportunities for people to walk to a station. Some commenters felt that locating the 118th Station's near I-405 would actually promote driving rather than walking to the park-and-ride. Many residents along this corridor expressed concern about changes in this area related to the

current expansion of I-405, leaving a more limited area for light rail to occupy, and that use of the former BNSF Railway corridor for light rail might preclude other future uses, such as a trail or commuter rail. Other comments opposed Alternative B7 due to potential impacts on wetlands and habitat in Mercer Slough Nature Park and on the Mercer Slough Environmental Education Center.

Both supporters and opponents of Alternative B7 were concerned about construction in Mercer Slough related to geological hazards, including construction of the South Bellevue Station and park-and-ride lot expansion (supporters) and construction across the slough (opponents).

Over 80 comment submittals specifically opposed the Bellevue Way Alternative (B1), due to the potential high number of relocations, neighborhood impacts, impacts on businesses, and limited connections in Segment C. Over 30 submittals supported this alternative, however, because of its service to denser residential and business areas. At least 40 submittals supported the 112th SE Alternatives (B2A, B2E, and B3) because of lower cost, better access to downtown, use of the South Bellevue Park-and-Ride, and the grade-separation of elevated sections to benefit traffic operations and increase safety. Several commenters suggested moving the 112th SE Bypass Alternative (B3) off of Bellevue Way SE and 112th Avenue SE corridors and placing it on the eastern edge of Bellevue Way's right-of-way to minimize potential roadway impacts. Most comments supported an elevated light rail profile that retains the South-to-West on-ramp, but commenters generally saw less need for the East-to-North off-ramp.

In addition to individuals, the following agencies or organizations voiced preferences about the following alternatives:

- At the time, Alternative B3 was supported by the City of Bellevue (if modified), Sierra Club, and Bellevue Downtown Association (if modified). Proposed modifications to this alternative focused on moving the light rail to the east side of Bellevue Way SE and 112th Ave SE. Several organizations expressed support for any Bellevue Way SE alternative, including the Town of Beaux Arts Village, Puget Sound Energy, Puget Sound Regional Council, State Department of Ecology, and condominiums along 118th Ave SE (Brookshire and Mercer Park).
- Alternative B7 was supported by Surrey Downs and Bellecrest neighborhood associations, Bellevue Chamber of Commerce, Bellevue Downtown Association, Eastside Transportation Association, Condominiums along 112th (Bellefield Residential Park and Carriage Place), and Vision Line Coalition.

7.2.1.3 Segment C, Downtown Bellevue

Approximately 250 comment submittals discussed Segment C. They generally focused on the type of profile: tunnel, at-grade, or elevated. The general preference was for a grade-separated alternative through downtown. More comments supported tunnels than opposed them, while more opposed at-grade and elevated profiles than supported them. Opposition to tunnels primarily focused on higher costs and risk, while support focused on higher ridership, a perception of less disruption during construction, and long-term compatibility with an urban environment. Traffic flow in Downtown Bellevue was referenced by over 80 commenters, mostly as support for why tunnel alternatives are necessary in this segment. Second most important among commenters was the view that tunnel alternatives would produce higher ridership, which would support long-term growth plans with less disruption to traffic.

Of the tunnels, the 106th NE Tunnel Alternative (C2T) received the greatest support (over 50 comment submittals); comments indicated that Alternative C2T would offer better access to the Wilburton Subarea on the east side of I-405 and avoid impacts north of downtown on businesses and neighborhoods. Other comments opposed Alternative C2T because of the extensive cut-and-cover construction in downtown and impacts on NE 6th and the Meydenbauer Convention Center. The 108th NE Tunnel Alternative (C3T) was favored by many because of the high ridership, fastest service through downtown, less construction disturbance, and the additional station it provides, which would serve the north downtown area.

The location of the Hospital Station (Alternatives C1T and C2T) was generally preferred over the Ashwood/Hospital Station, including by Overlake Hospital, Group Health, and Children's Hospital, although they indicated either station could work well for them. However, the Bellevue Way Tunnel Alternative (C1T) was unpopular because of the number of relocations and the construction disruption associated with a cut-and-cover tunnel. Potential park impacts from tunnel portals in Surrey Downs Park associated with Alternatives C2T and C3T and in McCormick Park associated with Alternative C3T were also identified as concerns in many comments.

Comments regarding the at-grade Couplet Alternative (C4A) generally opposed it because of longer travel time; impacts on business, surface traffic, property access, and pedestrian and vehicle safety; and the ability of this alternative to accommodate long-term traffic operations. Supporters for Alternative C4A liked the accessibility and lower cost of this alternative compared to tunnels and felt that it would not have the impacts of elevated alternatives. While most comments received on the 112th NE Elevated (C7E) and 110th NE Elevated Alternatives (C8E) were opposed to them because of visual, noise, and community impacts, others supported the elevated alternatives because of lower cost and faster travel times.

Several submittals expressed opposition to alternatives that use the Ashwood/Hospital Station (C3T, C4A, C7E, and C8E) because of the high number of business displacements (primarily medical offices) that would occur for construction staging. Several commenters felt the Old Bellevue and East Main Stations were unnecessary, while some supported these locations because of potential for future growth in these areas. In addition, at least 50 submittals for the Vision Line Coalition supported Alternative C2T.

In addition to individuals, the following agencies or organizations voiced preferences about the following alternatives:

- Alternative C2T was supported by City of Bellevue, Bellevue Chamber of Commerce, Eastside Transportation Association, Puget Sound Energy, Vision Line Coalition, and City of Snohomish.
- Alternative C3T was supported by the Bellevue Downtown Association.
- Alternative C4A was supported by Microsoft and Sierra Club.
- Both the City of Redmond and Redmond Chamber of Commerce supported affordable options, whether the alternative was at-grade or elevated. Meydenbauer Convention Center opposed Alternatives C1T and C2T.

7.2.1.4 Segment D, Bel-Red/Overlake

Approximately 90 parties commented on Segment D. Most comments related to specific alternatives in Segment D. Primary concerns raised in the comments were related to transportation and the built environment. Transportation comments included concerns regarding congestion, parking, and traffic impacts during construction; ridership; and reduced access to business properties. Other major built environment comments included concerns related to property acquisition, consistency with future land uses, noise and vibration impacts on medical equipment operation, visual impacts, and property value impacts. Comments regarding the natural environment included concerns about creeks and loss of trees. Project costs and economic impacts for specific alternatives were also mentioned frequently.

The NE 16th At-Grade Alternative (D2A) received the greatest support (over 35 comment submittals). Supporters of Alternative D2A noted that it would support redevelopment of the Bel-Red area consistent with the City of Bellevue's land use vision. Transportation operations were commonly referenced in support of Alternative D2A because this alternative would have the highest ridership, align with Bellevue and Redmond long-range planning goals and objectives, and avoid congested streets. The few commenters expressing opposition to Alternative D2A cited increased property impacts and the cost of this alternative. Over 20 comment submittals supported the NE 16th Alternative (D2E) because of fewer impacts on specific properties, service to greater numbers of people and businesses, similar benefits to transportation operations mentioned for Alternative D2A, and the elevation over creeks. Concerns expressed regarding Alternative D2E included its higher cost relative to Alternative D2A and its visual and property value impacts.

More comment submittals (over 20) opposed the NE 20th Alternative (D3) than supported it. Many of these commenters represented medical offices and facilities, and they noted noise and vibration impacts on medical equipment and patients. Other businesses also expressed concern regarding Alternative D3 property impacts and loss of trees and buffer area. Comments regarding the SR 520 Alternative (D5) cited its inconsistency with the land use plans for the area and lack of ridership. Others noted that this alternative would provide greater opportunity to attract riders from other Eastside communities and result in fewer impacts on existing businesses. Of the approximately 20 submittals expressing a preference for this alternative, approximately half supported and half opposed it.

Several commenters felt that light rail ridership estimates in Segment D should be updated to include the growth numbers included in the newly adopted Bel-Red Corridor and Overlake Neighborhood land use plans. There were a number of comments concerned about the current overcapacity of the existing Overlake Transit Center park-and-ride lot and the perception that no additional parking spaces

would be provided through the East Link Project. Additionally, concerns were expressed about the perceived traffic congestion around the vicinity of the Overlake Transit Center that would occur during light rail construction and operation.

In addition to individuals, the following agencies or organizations voiced preferences about the following alternatives:

- Alternative D2A was supported by the City of Bellevue, Bellevue Chamber of Commerce (if modified), Bellevue Downtown Association (if modified), City of Redmond, Transportation Choices Coalition, Vision Line Coalition (if modified), Puget Sound Energy, and Sierra Club.
- The City of Redmond supported Alternative D2A and Alternative D2E and also requests continued evaluation of the portion of Alternative D5 in the Overlake area.

7.2.1.5 Segment E, Downtown Redmond

Approximately 90 parties submitted comments related to Segment E. Most comments referred to specific alternatives and most pertained to built environment impacts from the alternatives, primarily visual impacts and noise impacts on residences. Comments regarding natural environment impacts were also common and included issues related to the Sammamish River, vegetative buffers, and the removal of trees.

More commenters (over 20) expressed objection to the Redmond Way Alternative (E1) than supported it (less than 10), citing traffic congestion along West Lake Sammamish Parkway and potential impacts on residences such as property value decreases, property acquisitions, noise impacts, and visual impacts. Natural environment concerns were also noted for this alternative. Those in support of Alternative E1 noted that it would best serve people coming from the east of Downtown Redmond and would have fewer ecosystem impacts than other Segment E alternatives.

Marymoor Alternative (E2) received the most support, approximately 35 submittals, with commenters noting relatively fewer impacts on residents, including less visual and noise impacts, fewer acquisitions, and reduced traffic. Several commenters preferred this alternative because it would follow an existing transit corridor, offer better accessibility, and include stops at Redmond Town Center and Redmond Transit Center. The few commenters opposed to this alternative expressed concern regarding traffic congestion and parking impacts.

Comments regarding the Leary Way Alternative (E4) noted concerns based on property acquisition, property value decreases, and roadway access. Specific property impacts mentioned include displacement of the Justice William White House, a historic resource; impacts on Redmond Town Center; and removal of the Residence Inn. Visual impacts were also noted, including impacts on the mature trees along the gateway to the city on Leary Way.

Over half of the commenters who discussed Segment E listed transportation issues. Many comments indicated concern about the Redmond Town Center vicinity parking, traffic, and access impacts with East Link. Similar concerns were expressed about current traffic congestion issues within this area, which commenters noted would only get worse with East Link. Their feeling was that station locations could encourage more drivers to come into Redmond, which could exacerbate traffic and parking problems. Similar comments expressed the importance of park-and-ride lot locations and their capacity because these facilities can directly affect traffic management and pedestrian access.

In addition to individuals, the following agencies or organizations voiced preferences about the following alternatives:

- Alternative E2 was supported by City of Redmond, Greater Redmond Chamber of Commerce, Microsoft, Transportation Choices Coalition, Puget Sound Regional Council, Puget Sound Energy, City of Snohomish, Redmond residents, and Marymoor Heights Condominium.

7.2.1.6 Maintenance Facilities

Approximately 12 comments mentioned the maintenance facility alternatives. Comments cited the inconsistency of the 116th, BNSF, and SR 520 maintenance facilities (MF1, MF2, and MF3) with Bellevue land use plans in the Bel-Red area. Some property owners were concerned about impacts on their property from MF1, MF2, MF3, and SE Redmond Maintenance Facility (MF5). Other commenters noted the property acquisition impacts that MF3 would have. One comment regarding MF5 noted the cost savings of this alternative and another noted the consistency of this alternative with land use plans. One commenter questioned the potential for hazardous materials spills at maintenance facilities.

7.2.1.7 Suggestions for Modified and New Project Alternatives

Approximately 75 submittals included comments that did not refer to the East Link Project as defined in the Draft EIS. Some of these comments questioned the project as light rail, instead suggesting that bus rapid transit (BRT) would provide high-capacity transit

between the Eastside and Seattle in a less costly manner with fewer impacts. Others stated that the SR 520 corridor would better provide this connection for light rail. Comments expressing a preference for light rail connections to Factoria and Eastgate were also submitted. Other commenters stated that the project did not serve other Eastside communities such as Kirkland and Renton. A couple of commenters questioned the connection of the Eastside to Downtown Seattle rather than directly to the airport or other Eastside communities. Several commenters suggested the use of the LEVX technology, described as a "Zero Energy Permanent Magnet Suspension System and highly efficient Hybrid Non-Contact Linear Drive" for HCT to the Eastside.

Approximately 70 commenters submitted suggestions for modifications to existing alternatives. These modifications were suggested mainly to reduce property acquisitions, neighborhood impacts, business impacts, traffic congestion, or travel time, or to serve specific areas. The following discussion does not include all of the suggestions, but those received more frequently are described.

The City of Bellevue recommended and the Bellevue Downtown Association supported a modified Alternative B3 that would follow the east side of Bellevue Way and 112th Avenue SE, turn east before SE 8th Street, at-grade as much as possible, and then turn east to 114th Avenue SE (becoming elevated) and north to the East Main Station. This alternative, as suggested for study by the City and the Bellevue Downtown Association, would include various mitigations to address the function of Bellevue Way, maintain and improve HOV access from Bellevue Way SE to westbound I-90, and maintain access for Enatai residents. Numerous commenters expressed support for the Alternative B3 modification.

One of the more frequently suggested modifications was termed the Alternative B7/C8E hybrid route, which would follow the Alternative B7 route and then run along 118th Avenue SE to a station near Greenbaum Furniture, and continue north along 114th Avenue SE to Main Street with no additional stations. Continuing past Main Street on 114th Avenue NE, it would enter downtown via a tunnel at NE 2nd Street rather than the elevated proposal. One alternative termed "C8T" was described similarly to the modified Alternative C8E and was also frequently suggested. Several commenters suggested using the former BNSF Railway corridor for longer segments, some all the way through Segment C.

Several commenters suggested modifying Alternative D2A to cross under 120th Avenue NE and 124th Avenue NE with a retained-cut profile and moving this route to the south to reduce property impacts.

7.2.2 SDEIS Overview

Sound Transit received 822 comments on the East Link Project SDEIS during the 60-day public comment period. Comments were received from private individuals, homeowner associations, community organizations, business groups, businesses, and government agencies. Of these 822 comments, 749 were from private individuals, whose comments are summarized here by segment. Comments from government agencies, businesses, residential organizations, and community interest groups are summarized following this general comment summary. The individuals' comments were primarily focused on Segments B and C, and most limited their comments to a specific alternative and were from individuals living, working, or with property interests in the project study area; comments were also received from those citizens with a general interest in the project. Most comments were generally supportive of East Link but expressed preferences for or issues about specific alternatives. A large number of submittals simply expressed support for the project and requested it not be delayed; others requested a delay for more information development on a revised Alternative B7.

The following summary lists how many comments referenced each segment, describes which segment alternatives received the largest number of supportive comments, highlights which segment alternatives received the most endorsements from organizations and agencies, and describes environmental issues raised in the comments. The most frequently mentioned environmental concerns centered on noise impacts on residences, removal of park lands (either Mercer Slough Nature Park or Surrey Downs Park), impacts on traffic along Bellevue Way and Downtown Bellevue, and how these impacts might affect adjacent neighborhoods, such as Enatai, Surrey Downs, or the condominiums adjacent to 118th Avenue SE.

7.2.2.1 Segment A, I-90

Most comments concerned the D2 Roadway's continued joint use with bus and light rail transit, the loss of the center roadway for HOV vehicles and Mercer Island use, and the potential traffic impacts this might have.

7.2.2.2 Segment B, South Bellevue

Most individuals commenting on this segment focused on either support for or opposition to *Preferred Alternative B2M* or Alternative B7. A total of 270 letters supported and 90 opposed *Preferred Alternative B2M*.

An additional 4 letters supported any alternative on Bellevue Way SE and 119 additional letters opposed any alternative on Bellevue Way SE. A total of 165 letters supported Alternative B7, while 155 letters stated their opposition to B7. Those who support *Preferred Alternative B2M* generally remarked that it has better access, is more cost-effective, and is more centrally located than Alternative B7. Those that stated preference for Alternative B7 expressed that *Preferred Alternative B2M* would have greater neighborhood impacts, including visual, traffic, noise, and residential relocations, as well as impacts on Mercer Slough and the Winters House. These commenters also remarked that Alternative B7 could be modified to be lower cost, could use the former BNSF Railway corridor, would better allow for future extensions east and south, and would have less neighborhood and ecosystem impacts. Those who stated their opposition to Alternative B7 asserted it would have greater ecosystem and noise impacts, lower ridership, a higher cost, and would be less accessible. Regardless of which alternative they preferred, many commenters expressed concern about impacts on Mercer Slough.

A number of commenters referenced the Alternative B7 study underway by the City of Bellevue, and requested that Sound Transit wait for the release of this report to issue the Final EIS or expressed support for the City's modified Alternative B7, known as B7-Revised or B7-R. A number of individual commenters referenced the study completed by the Building a Better Bellevue organization; this study includes suggestions to lower the cost of Alternative B7. In addition to individuals, specific organizations that also expressed preferences for *B2M* or B7 alternatives are listed below:

- *Preferred Alternative B2M* is supported by entities such as the Muckleshoot Indian Tribe Fisheries Division, Bellevue Club, and Transportation Choices Coalition. A large percentage of the comments supporting *Preferred Alternative B2M* were from individual commenters.
- *Preferred Alternative B2M* and all Bellevue Way and 112th Avenue SE running alternatives are not supported by entities such as Miles Construction NW and Building a Better Bellevue. *Preferred Alternative B2M* is also not supported by entities such as the City of Bellevue City Council, the Vision Line Coalition, and the Surrey Downs Historical Society.
- Alternative B7 is supported by entities such as the Bellevue City Council and the Washington Trust for Historic Preservation for its reduced impacts on the Winters House. A large percentage of the comments supporting Alternative B7 were from individual commenters, many whom live in the Enatai or Surrey Downs neighborhoods.
- Alternative B7 is not supported by entities such as the Transportation Choices Coalition, Meydenbauer Center, YMCA, and Low Income Housing Institute.
- Several community organizations, such as the Surrey Downs Historical Society, Building a Better Bellevue, and the Vision Line Coalition, support a modified Alternative B7. The City of Bellevue City Council also supports Alternative B7 with modifications as summarized in the Public Agency Comments section below.

7.2.2.3 Segment C, Downtown Bellevue

A total of 62 letters supported *Preferred 108th NE At-Grade Alternative (C11A)* and 25 opposed it, while 220 letters supported *Preferred 110th NE Tunnel Alternative (C9T)* and 15 opposed it. Three letters mentioned 110th NE At-Grade Alternative (C9A), all opposing it, and eight letters were received about 114th NE Elevated Alternative (C14E), two supporting and six opposing it. A large number of commenters expressed general support for providing access to downtown and putting stations "where people work and live." Many commenters specifically stated they opposed alternatives that traveled on the edge of Downtown Bellevue.

Many comments were received from residents of the Belle Arts Condominiums, which stated a strong preference for a tunnel alternative rather than a surface street option. Residents were concerned that a surface street option would greatly increase the amount of noise impacts in the area due to train noise and the loss of sidewalk space in front of residences. They expressed that this loss would bring traffic and pedestrian noise closer to the buildings along the route. They were also concerned about safety, which they felt would deteriorate due to the increase in riders at the bus stop located at 108th Avenue NE and Main Street. The Belle Arts community was also concerned with noise associated with an increase in people waiting at the nearby bus stop.

Some individuals listed their concerns over alternatives that travel up 112th Avenue SE because of impacts on Surrey Downs Park and the neighborhood that would be affected by removal of a row of condominiums along 112th Avenue SE for connections to *Preferred Alternatives C11A* or *C9T.*

Most comments expressed preference for a tunnel in order to not restrict future development aboveground and to minimize traffic impacts. Many comments were received that requested Sound Transit continue working with the City of Bellevue on funding for the tunnel. In addition to individuals, following are specific organizations that also listed preferences for *Preferred Alternative C11A* versus *C9T*:

- *Preferred Alternative C11A* is supported by entities such as the Muckleshoot Indian Fisheries Division, the Bellevue Branch of the King County Library, Meydenbauer Center, the YMCA, and the Low Income Housing Institute. The majority of the comments received supporting this alternative were from individual commenters.
- *Preferred Alternatives C11A* and *C9T,* as they are currently designed, are not supported by entities such as the Bellevue City Council and Washington Trust for Historic Preservation. However, the Bellevue City Council does support *C9T* with a portal on 2nd Street rather than on Main Street. *Preferred Alternative C9T* is supported by entities such as the Bellevue Branch of the King County Library, Meydenbauer Center, the Transportation Choices Coalition, King County Department of Transportation, the Red Lion Hotel, the Bellevue Downtown Association, the YMCA, and the Low Income Housing Institute.
- Alternative C9A is not supported by entities such as the City of Bellevue City Council.
- Alternative C14E is not supported by entities such as Transportation Choices Coalition.

7.2.2.4 Segment D, Bel-Red/Overlake

Nine out of ten of the submittals received for Segment D supported *Preferred Alternative D2A,* with most commenters approving of this alternative's new design along SR 520 and Overlake Village Station location. Most commenters, including the Transportation Choices Coalition, were supportive of *Preferred Alternative D2A* and stated that it would best serve the Bel-Red Corridor and Overlake areas of Redmond and provide the best ridership access. A small percentage of commenters were concerned about impacts on residences and businesses along the *Preferred Alternative D2A* and Alternative D2E guideways, but no letters specifically voiced opposition to any Segment D alternatives. However, the SDEIS did not address other Segment D alternatives. Two individuals submitted comments in support of Alternative D5. In addition to individuals, listed below are specific organizations and businesses that voiced support for *Preferred Alternative D2A*:

- *Preferred Alternative D2A* is supported by entities such as Puget Sound Energy, Microsoft Corporation, the Muckleshoot Indian Tribe Fisheries Division, the Transportation Choices Coalition, and the Greater Redmond Chamber of Commerce. A small number of comments received were from individual commenters, who also supported *Preferred Alternative D2A*.

7.2.2.5 Segment E, Downtown Redmond

One individual submitted comments in opposition to the Downtown Redmond Station and *Preferred Alternative E2* due to concerns over costs and noise and safety impacts at their residence. The only other comments received regarding *Preferred Alternative E2* were from the City of Redmond and the Greater Redmond Chamber of Commerce. These comments are discussed in the Public Agency Comments section below.

- *Preferred Alternative E2* is supported by the City of Redmond.

7.3 Comments Received from Public Agencies

7.3.1 Project Area Jurisdictions

7.3.1.1 Seattle

The City of Seattle did not submit comments on the Draft or SDEIS.

7.3.1.2 Mercer Island

Draft EIS Comments

In the comments received on the Draft EIS, the City of Mercer Island supported the additional mobility that this project would bring the island and the region. The City also maintained that based on the agreements of the 1976 Memorandum of Agreement and the subsequent amendments, they anticipate that Mercer Island will maintain use of the HOV lanes until such time that these access points exceed operational standards. The City did not support the pedestrian overcrossing to the Mercer Island Station, with the understanding that Sound Transit would work with the City to address park-and-ride capacity. The City favored modifying the I-90 Two-Way Transit and HOV Operations Project to provide an eastbound HOV off-ramp at Island Crest Way instead of at 77th Avenue. The City was concerned that existing park-and-ride lots will not be adequate for future ridership demands that would be required to maintain Mercer Island use of the light rail facility. The City looked forward to working with Sound Transit to ensure that pedestrians would be well served, that design guidelines would be upheld, and that construction

impacts would be addressed. They were also interested in working with Sound Transit on mitigation for parking impacts.

SDEIS Comments

In the comments received on the SDEIS, the City of Mercer Island stated they were pleased that the I-90 facility within Mercer Island has been recognized for its eligibility for the National Register of Historic Places. Mercer Island is interested in preserving the historical use of the HOV lanes for Mercer Island single-occupancy vehicles in accordance with the 1976 Memorandum of Agreement. They also commended Sound Transit and WSDOT for the continued partnership in resolving issues during this planning process.

7.3.1.3 Bellevue

Draft EIS Comments

The City of Bellevue submitted a letter in response to the Draft EIS summarizing the City Council *Preferred Alternatives*, which included, at that time, a modified Alternative B3 in Segment B, Alternative C2T in Segment C, and *Preferred Alternative D2A* in Segment D. Major themes in their discussion of preferred alternatives include markets served, surface transportation impacts, the ridership analysis, noise impacts, business and residential displacements, and ecosystem impacts. This submittal also included a staff summary letter that summarizes the themes reflected in the City's detailed comments on the Draft EIS. The City staff comments discussed differences in transportation modeling results from their own analyses, additional transportation analysis needed, and other analyses they felt were incomplete or lacking sufficient detail, including neighborhoods, visual quality, parks, critical areas, and construction impacts. The City staff also requested more detailed information about mitigation and the permitting process.

The Bellevue City Council's *Preferred Alternative* was Alternative B3 for South Bellevue, modified to run on the east side of 112th Avenue SE and to turn east before SE 8th Street. The City believed this alternative would be most consistent with local policy objectives and would best meet the City's needs. The Council also felt this modified alternative would help maintain traffic capacity on Bellevue Way SE, minimize impediments to driveways, maintain and optimize regional connections at the South Bellevue Station and have convenient pedestrian and bicycle access to nearby neighborhoods and the I-90 multi-use trail. The City expressed concern about permanent traffic impacts on Bellevue Way SE and suggested mitigation strategies, including grade-separated station access and an additional HOV lane on Bellevue Way. The City commented that they would like to ensure the westbound HOV on-ramp from Bellevue Way SE is preserved. The displacement of transit service with a temporary closure of the South Bellevue Park-and-Ride Lot during construction was a concern.

The City Council felt that Alternative B7 could provide additional long-term regional transit benefits along the I-405 corridor, but ultimately concluded that Alternative B7 presented substantial adverse impacts with limited opportunities for mitigation. However, the Council felt this alternative should receive additional analysis in the Final EIS. The City also recognized that Alternative B7 would create out-of-direction travel for patrons east and south of I-90 and require transit service modifications that would lengthen a rider's travel time and deter users of the regional system. The City Council unanimously rejected Alternatives B1 and B2E because of high levels of potential construction and property impacts. The Council did not support Alternative B2A due to the location of the SE 8th Station and the widening of 112th Avenue SE that would be required. For all Segment B alternatives, the Council opposed the loss of westbound HOV on-ramps at I-90 and would like these ramps preserved.

The Bellevue City Council preferred Alternative C2T in Segment C because it would maximize the regional system, minimize the potential for Downtown Bellevue to be a chokepoint for the system, and allow for future growth and land use opportunities east of I-405. The Council was concerned about the cut-and-cover construction for Alternative C2T and how best to minimize this potential impact as well as the reduction in roadway lanes on NE 6th Street. The City Council rejected Alternative C1T because of high cost, risk, and residential and business displacements. However, the Council did like the location of the Old Bellevue Station associated with Alternative C1T, and proposed that Sound Transit analyze a station at Main Street and 106th Avenue NE with Alternative C2T, in lieu of the East Main Station. Alternative C3T was not preferred by the Council because of the Ashwood/Hospital Station location, the high number of potential business displacements, and potential impacts on McCormick Park.

The Council unanimously rejected Alternative C4A because they feel it would limit capacity in already strained right-of-way and lacks community support. The City believes Bellevue's "superblock" configuration with few streets and narrow 60-foot street right-of-way constrain the ability to add capacity for light rail or vehicular traffic in the future.

Both elevated alternatives were rejected, partially due to visual and potential pedestrian impacts and access conflicts. In addition, the City felt that Alternative C7E would have poor service to most of Downtown Bellevue, and the Alternative C8E columns placed in the medians would cause traffic conflicts.

Within Segment D, the City preferred Alternative D2A because it would advance their long-range goals, whereas Alternative D5 is the least consistent with their long-range planning. The Council was not as supportive of Alternative D2E, even though it follows the same route as Alternative D2A, because it is entirely elevated. They felt an elevated alternative could have potential visual impacts on planned development in the Bel-Red area, and it would have greater cost than Alternative D2A without increasing ridership. The City's transportation concern with Alternative D3 focused on access limitations for commercial properties along NE 20th Street and the potential economic impacts on businesses along this corridor. Finally, the City supported East Link reaching Overlake Transit Center and providing interim transit service from Downtown Redmond to mitigate any potential interim terminus parking and traffic impacts.

The City staff expressed concerns about the land use and growth forecasts as they relate to transportation demand modeling, consistency with Puget Sound Regional Council *Destination 2030*, the Bel-Red Subarea plan, and the Downtown Implementation Plan update. The City requested that additional information be provided in the Final EIS transportation analysis for street operations, access modifications, increased study area, and mitigation. The City staff also expressed concerns about the at-grade downtown operations analysis, including constraints on intersection signal phasing, driveway closures, intersection blockages, and limitations on future roadway system expansion. The City staff felt that an at-grade alternative in Downtown Bellevue may limit its ability to meet long-term vehicle forecast demands for the downtown area because the study area does not include east of I-405.

The City viewed maintenance base MF5 in Downtown Redmond as the most desirable location. The other three maintenance bases evaluated in Segment D are not consistent with the land uses envisioned for the Bel-Red corridor. Furthermore, MF3 would require piping a stream, which is inconsistent with current City of Bellevue policies.

SDEIS Comments

The City of Bellevue submitted two letters in response to the SDEIS, one from the Bellevue City Council and the other from the City of Bellevue Staff. The City Council letter focused on their preferences for alternatives in Bellevue and requested additional information on these alternatives, whereas the City staff provided input on issues with the SDEIS document and the analyses. The Bellevue City Council opposes both *Preferred Alternative C11A* and Alternative C9A and requests that Sound Transit consider their forthcoming study of a revised Alternative B7, "B7-R," before the East Link Final EIS is released. This alternative would include a station at I-90 and Bellevue Way SE, and it would shift the tunnel portal of *Preferred Alternative C9T* to NE 2nd Street. This alternative was not evaluated in either the Draft EIS or SDEIS.

The City Council expressed that the SDEIS does not fully address construction impacts; phasing of construction; and mitigation for related impacts on roadways, historic, parks, wetlands, and other sensitive areas. Another concern of the City Council is the noise impacts during operation and construction of East Link. They request further analysis but acknowledge that Sound Transit will be conducting a best practices study in this area. Finally, by reference, they submitted eight reports conducted and prepared by the City of Bellevue. These reports include peer reviews of the Draft EIS, noise and ecosystems analyses, as well as Bellevue Light Rail Best Practices, Downtown Bellevue VISSIM Analysis, and the South Bellevue Station Alternative Location Analysis.

The City of Bellevue staff provided a detailed list of areas where they would either like additional analysis or suggested changes in the analysis. As an introduction, the City is requesting that the Downtown Bellevue Light Rail VISSIM Analysis be included in the Final EIS transportation analysis, and stated they felt that the slight changes in ridership do not fully reflect the anticipated changes in Bel-Red land use plans; the South Bellevue Park-and-Ride Lot Transportation Analysis warrants additional mitigation detail; and the noise impacts warrant further research of mitigation measures. Additionally, they are concerned that the noise impacts should address park impacts and that the noise analysis methodology may understate the project noise impacts. The City of Bellevue also expressed a desire for a numeric visual assessment rating evaluation and additional visual simulations to capture park impacts and change in the former BNSF Railway corridor.

Overall, the City of Bellevue expressed a desire for more detailed mitigation planning on visual impacts, parks, wetlands, and other sensitive areas, especially for construction phases. They are concerned about

construction impacts on neighborhoods and businesses, the relocation of the Bellevue Transit Center, duration and number of lane closures, and the potential damage to the Winters House. They have requested additional information on mitigation, more cross sections in the design drawings, additional analysis of land use goals, and more detail about which parcels are partial versus full property acquisitions. Like the City Council, they too include through reference the multiple reports and peer reviews of the East Link Project developed by the City.

7.3.1.4 Redmond

Draft EIS Comments

The City of Redmond provided general comments as well as indicated the City's *Preferred Alternative*. The City emphasized the importance of managing costs and risks so that East Link can be extended to Downtown Redmond. Alternatives D2A, D2E, and D5 were identified as the alternatives the City would like Sound Transit to continue to evaluate in Segment D for the Overlake neighborhood. For Segment E, the City supported Alternative E2.

The City requested that the Overlake Transit Center be identified as an interim terminus facility, not the ultimate terminus of East Link. To address concerns raised over traffic conditions surrounding the Overlake Transit Center and as partial mitigation for potential construction impacts of an interim terminus at Overlake Transit Center, the City of Redmond recommended increasing the number of parking spaces at the park-and-ride to serve nearby residents, but wants the park-and-ride to be sized appropriately so as not to act as a magnet for regional parking demand.

Additionally, with Overlake Transit Center as an interim terminus, the City of Redmond preferred that the 1,400-space parking structure near the SR 520/202 interchange provide a transit connection with the Overlake Transit Center for Redmond and other users to the east.

The City Council saw advantages with Alternatives D2A and D2E in Redmond's Overlake area because these alternatives are consistent with adopted visions and policies and with planned development in the area. These alternatives would have fewer potential impacts on businesses and utilities, and the aerial alignment over 148th would cost less than tunneling under with Alternative D5. The City expressed concern with these two alternatives because of the potential impacts they would have on traffic operations along NE 24th Street. They also expressed concern with the potential urban design and aesthetics of the aerial structures.

The City saw the potential for few traffic impacts as the main advantage with Alternative D5. Concerns about Alternative D5 included the potential impacts it would have on properties and businesses and potential conflicts with planned SR 520 improvements and a proposed stormwater management facility. They were also concerned with Alternative D5's lower ridership and with the station's potential urban design. Finally, the City noted the costs for tunneling under 148th Avenue NE as a concern. The City requested that the portion of the Alternative D5 route and station north of the Overlake Safeway continue to be considered as an alternative to running along NE 24th Street.

The City of Redmond supported Alternative E2 in Segment E because it would be mostly located in existing rights-of-way, has strong citizen support, and maximizes ridership while minimizing potential cost and impacts. While the City recognized the potential cost, traffic, and property impacts associated with extending Alternative E2 to the Redmond Transit Center, they felt there would also be potential opportunities to mitigate these impacts, such as pedestrian and local transit service connections, that should be investigated before selecting the Redmond Town Center as the terminus.

SDEIS Comments

The City of Redmond supported *Preferred Alternative E2*; however, they noted several changes have occurred since the initial design of this alternative. Namely, Redmond has purchased portions of the former BNSF Railway corridor and adopted the *Redmond Central Connector Master Plan Infrastructure Alignment Plan* on October 19, 2010. This plan includes adding a large stormwater trunk line inside the former BNSF Railway corridor, which constrains available right-of-way to construct the light rail. They requested that Sound Transit reposition the light rail alignment in a larger corridor that includes the former BNSF Railway corridor and the adjacent NE 76th Street right-of-way.

They also requested that Sound Transit locate support facilities and tail tracks in southeast Redmond rather than in downtown, explore water-related issues in the area of SR 520 and Bear Creek Trail, consider future planned access points and trail connections, and consider a multimodal bridge across SR 520 at the Overlake Transit Center. Due to the new connection for Bear Creek Parkway, Redmond is requesting additional transportation analyses at future intersections. The City expressed concern regarding the construction impacts and potential mitigation strategies at Overlake Transit Center, and expressed

concerns about noise-related impacts that may not be fully addressed in the Downtown Redmond and Overlake areas. The City also questioned some of the transportation and visual analyses along *Preferred Alternative D2A*.

7.3.1.5 King County

King County Metro Transit

Draft EIS Comments

King County Metro Transit submitted a comment letter on the Draft EIS that focuses on four main issues in the I-90 corridor: use of the D2 Roadway, potential I-90 bus impacts, Mercer Island access and egress for buses, and cross-lake tolling assumptions.

The County commented that if the D2 Roadway is not available as joint use for buses, the increase in bus travel times for routes on the Eastside and routes on 4th Avenue would be unacceptable for transit users. The County believes that the Final EIS analysis should offer alternatives if joint operation is not feasible, such as alternate bus priority pathways or non-D2 Roadway routes for East Link.

King County expressed concern about potential impacts that light rail could have on bus transit service in the I-90 corridor east of I-405 because of East Link's use of the center roadway and D2 Roadway. The County believes the Final EIS analysis should include changes to bus and rail networks and facilities needed to mitigate these potential impacts.

The current interchange design at 77th Avenue SE does not provide direct westbound access to the I-90 HOV lane. King County is concerned that WSDOT might not be able to construct the proposed eastbound direct HOV off-ramp at 77th Avenue. They expressed concern that bus access to enter/exit Mercer Island is limited, and Metro may not be able to provide stops on Mercer Island for I-90 service. During light rail operation this may not be a need with light rail and Sound Transit Route 554 service.

King County Metro Transit also commented about its concern that the Island Crest Way westbound on-ramp could degrade HOV lane performance if single-occupant vehicles are allowed to use the lane, even if they were allowed to use the lane through a HOT lane concept.

The County also expressed concern that the Draft EIS analyzed neither the impacts of tolling on SR 520 in the nearer term (i.e., 2020) nor those of possible tolling on I-90. Because tolling could have a potentially substantial impact on traffic flow, transit ridership, and the speed and reliability of bus travel, King County requested more analysis of tolling be provided in the Final EIS.

SDEIS Comments

In their comments on the SDEIS, King County Metro Transit supported *Preferred Alternatives B2M* to *C9T*. They appreciate that the D2 Roadway would have continued joint use with bus and light rail transit under *Preferred Alternative A1*. Their comments included concerns about how construction might disrupt existing transit facilities and services, especially at transit centers in the study area (South Bellevue Park-and-Ride Lot, Bellevue Transit Center, and Overlake Transit Center), and suggested holding a multijurisdictional meeting to resolve construction coordination issues. Metro would like to reach agreement on construction mitigation prior to the Record of Decision.

King County Department of Natural Resources and Parks, Wastewater Treatment Division, Draft EIS Comments

Draft EIS comments submitted by the Wastewater Treatment Division requested that a reference be included in the Final EIS to a King County Code regarding industrial waste and a King County Public Rule regarding construction dewatering discharge to the sanitary sewer. They described the requirements and approvals to obtain wastewater management and sanitary sewer discharges during construction and operation of East Link. The King County Wastewater Treatment Division did not submit comments on the SDEIS.

King County Library System, SDEIS Comments

The King County Library in Bellevue submitted a comment letter on the SDEIS supporting the *Preferred Alternative B2M* to either *C11A* or *C9T* and supported completing the project as soon as possible.

7.3.1.6 Federal Agencies and Tribes

U.S. Environmental Protection Agency

Draft EIS Comments

The U.S. Environmental Protection Agency (EPA) stated that the Draft EIS was an exemplary environmental review of the East Link Project that communicated benefits of the project over the No Build Alternative and provided quality mitigation measures, such as low-impact development measures for stormwater and an understanding of mitigating residual ecosystem impacts. The EPA offered additional input on aquatic and air quality mitigation measures during construction.

SDEIS Comments

The EPA had no substantial environmental concerns regarding the alternatives analyzed in the SDEIS. In recognition of the differences in support for *Preferred Alternative B2M* in Segment B, EPA suggested explaining why ridership varies so greatly for

Alternative B7, explaining how land uses would be supported by the different alternatives, describing the values and functions of the wetlands potentially impacted, and describing whether the former BNSF Railway corridor can support the operation and also the construction logistics of light rail, freight, and a trail. EPA requested additional information in the Final EIS on the feasibility and engineering solution to the unplanned movement of peat and clay in Segment B, and if Alternative B7 is selected, would like the reasons clearly stated for selecting an alternative with higher impacts on wetlands.

Federal Highway Administration, Draft EIS Comments

The Federal Highway Administration's (FHWA's) concerns on the Draft EIS focused on the feasibility of light rail on the floating bridge and associated air space and lease agreements necessary for temporary and permanent use of I-90 and I-405. FHWA also expressed concern for operational and construction safety measures. FHWA requested additional information on the feasibility of an expansion joint to accommodate light rail, highway operations, and potential safety impacts from the project; safety impacts from construction on I-90; impacts from changes to HOV facilities; and use of the HOV lanes by Mercer Island single-occupant vehicles. They outlined the areas where Sound Transit would be required to receive FHWA approval before progressing, namely, HOV commitments to Mercer Island, feasibility of expansion joints, allowance for pedestrian crossings and stations located over interstates, and locating the substations on FHWA facilities or land owned by FHWA. FHWA did not submit comments on the SDEIS.

Advisory Council on Historic Preservation

In response to the Draft EIS, the Advisory Council on Historic Preservation (ACHP) advised that Sound Transit continue to work with the State Historic Preservation Office to complete the Section 106 consultation. ACHP did not submit comments on the SDEIS.

Muckleshoot Indian Tribe

Draft EIS Comments

The Draft EIS comments from the Fisheries Division of the Muckleshoot Indian Tribe supported alternatives that would have the fewest potential impacts on water resources, including streams and wetlands in the project vicinity. The Muckleshoot Tribe stated its preference for Alternative B1 due to fewer impacts on streams, wetlands, and buffers; Alternatives C1T and C3T east to the Ashwood/Hospital Station or Alternative C8E ; Alternative D2E because it is elevated for most stream crossings; and Alternatives E1 or E4 due to fewer ecosystem impacts. The Muckleshoot Tribe commented that MF1 would cause the least ecosystem impacts and expressed opposition to MF3 based on the relocation of Goff Creek. They requested more assessment of existing stream habitat value, loss of habitat, and the potential impacts of artificial light spilling onto waterways. They also clarified the Tribe's fishing treaty rights in the project area.

SDEIS Comments

The Muckleshoot Indian Tribe supported *Preferred Alternatives B2M, C11A,* and *D2A* (including the D2A - 120th and NE 24th Design Options) analyzed in the SDEIS because they found that these alternatives would have the least impact on streams and wetlands. However, they expressed concerns about information not present in the SDEIS regarding streams and the potential project impacts on fisheries, such as the impacts of lighting on water crossings, construction at stream crossings, lengthening culverts, and maintenance activities that can affect fish habitat and result in barriers for fish passage. They felt that more information is needed on the Sammamish River, Bear Creek, the Unnamed Tributary of Kelsey Creek, and Sturtevant Creek (east of I-405) to properly determine impacts on these streams. They also provided corrections regarding the timing of their fishing season. Additionally, the letter requested that stormwater impacts be offset with improvements to the streams and cautions that impacts on salmonid resources may disproportionately affect the Muckleshoot Indian Tribe.

7.3.1.7 State Agencies

Washington State Department of Ecology, Draft EIS Comments

The Washington State Department of Ecology (Ecology) submitted Draft EIS comments organized by the various programs they manage. For the Water Quality Program, Ecology listed requirements for stormwater runoff and a National Pollutant Discharge Elimination System (NPDES) permit. For the Hazardous Waste and Toxics Reduction Program, Ecology defined hazardous waste requirements; and for the Shoreline and Environmental Assistance Program, they reviewed suggestions for Section 401 water quality certification and suggested changes to water quality references in the Ecosystem Technical Report (Appendix H3). Clarifications on wetland impacts and wetland mitigation measures in both the Draft EIS as well as the Ecosystem Technical Report were suggested. Specific concerns were consistency with shoreline master plan updates (which are still under development); disposal of stockpiled

construction material; and emphasis on avoiding alternatives that affect wetlands, the Sammamish River, and Bear Creek. Ecology did not submit comments on the SDEIS.

State Department of Archaeology and Historic Preservation, Draft EIS Comments

The Washington State Department of Archaeology and Historic Preservation (DAHP) submitted a letter in response to the Draft EIS that concurred with Sound Transit's submittal of 45 properties as eligible for listing in the National Register of Historic Places (NRHP), as well as the 332 non-eligible properties. DAHP felt further archaeological investigation would be warranted for the *Preferred Alternative(s*). DAHP encourages discussion of effects on the NRHP-listed I-90 Bridge, the Endresen Residence, and the Romaine Electric Building and requested more information on the project regarding the INS Building in Seattle.

DAHP stated that they have concerns about project changes that might affect the Winters House and believed that, depending on the alternative chosen and how it is implemented, there could be adverse effects on the Pilgrim Lutheran Church, the potential Surrey Downs historic district, and the former Bellevue Fire Station, all of which are resources within the City of Bellevue. DAHP indicated that Alternative E4 would result in adverse effects on the Justice William White House in Redmond. DAHP did not submit comments on the SDEIS.

7.3.1.8 Regional Public Agencies

Puget Sound Regional Council

Draft EIS Comments

The Puget Sound Regional Council (PSRC) noted in response to the Draft EIS that the proposed East Link Project connects three of the region's cities that contain designated Regional Growth Centers, which are the backbone of the transportation network, and that linking these centers with a highly efficient transportation system is a key objective of its regional plans. PSRC would like the Final EIS to improve the characterization of *Vision 2040*, Sound Transit 2 (ST2), and the expandability of light rail in the future. PSRC would like Sound Transit to emphasize the implications of East Link on land use and the need to serve regional transit centers and assess the maintenance facilities for least energy and labor costs. PSRC opposed Alternatives B7 and D5 because these alternatives do not directly serve planned population areas. They fully supported Alternative E2.

SDEIS Comments

PSRC expressed in their comments on the SDEIS that the current *Preferred Alternatives* analyzed in the SDEIS addressed previous impact concerns they had expressed in comments on Draft EIS. PSRC felt that the alternatives that use the Hospital Station within the former BNSF Railway corridor offer good connectivity for future extensions northward. PSRC emphasized that direct connectivity with regional transit centers are important for encouraging strong ridership and realizing maximum benefit from existing investments in these facilities. PSRC recognized that if the Downtown Redmond Station is the selected terminus, then the transit center might need to be relocated closer to the light rail station. Similarly, PSRC encouraged prioritization of strong pedestrian and bicycle access to each station and specifically mentioned improving pedestrian access across NE 8th Street for the Hospital Station.

Puget Sound Clean Air Agency, Draft EIS Comments

Puget Sound Clean Air Agency (PSCAA) supported the East Link Project Draft EIS for its contribution to increasing choices in mobility. PSCAA wanted to make sure that Executive Order 07-02 Washington Climate Change Challenge is addressed through the assessment of greenhouse gas emissions and that the Final EIS assesses the worst-case air quality scenario. The PSCAA letter included a number of preferred mitigation measures to reduce air quality impacts from construction. PSCAA did not submit comments on the SDEIS.

7.3.1.9 Other Public Agencies

Draft EIS Comments

Three jurisdictions that are not within the study area of the East Link Project corridor submitted comments on the Draft EIS to Sound Transit voicing strong support for the East Link Project. Project-specific comments focused on accommodating station locations that could serve commuters to and from their communities.

The City of Snohomish would feel most served by having stations on the former BNSF Railway corridor where a potential future Eastside Corridor rail service could interconnect with East Link. The stations that seemed most valuable to the City of Snohomish were Redmond Town Center, SE Redmond, and the Hospital Stations. The City of Snohomish also asked Sound Transit to consider increased bus service at the end of the line and building the project between Redmond and Bellevue first.

The City of Issaquah asked that Sound Transit consider the implications of future connections to Issaquah in the development of this environmental review—such as assessing necessary accommodations at the South Bellevue Park-and-Ride and the Mercer Island Station for additional light rail service to

include extensions to Issaquah. The City of Issaquah would prefer to have future service be direct to both the Bellevue Transit Center Station and Downtown Seattle.

The Town of Beaux Arts Village supported alternatives that offer a station at the South Bellevue Park-and-Ride because that would provide them with enhanced mobility and access. The Town of Beaux Arts Village was concerned about potential traffic impacts if the westbound HOV on-ramp were removed, but felt that loss of the eastbound HOV off-ramp would not be a significant impact.

The Port of Seattle offered input on two issues regarding the East Link Project: the use of the Eastside Rail Corridor (i.e., former BNSF Railway corridor) and the potential impacts of the project on freight and truck operations in the conversion of the I-90 center roadway to light rail. They would like to make sure that the trail, light rail, and the potential commuter rail could be accommodated in the Eastside Rail Corridor. They also felt that the additional discussions of freight movement and the possibility of mitigating increased travel time for freight movement are necessary.

SDEIS Comments
The Port of Seattle's comments provided an update on the ownership of the former BNSF Railway corridor and their intentions of use within this corridor. In December 2009, the Port acquired the former BNSF Railway right-of-way in King and Snohomish Counties. Following this action, the City of Redmond purchased the Redmond spur portion and Puget Sound Energy acquired an easement in this spur. This action included a signed Memorandum of Understanding between several parties (Port of Seattle, Sound Transit, King County, the City of Redmond, the Cascade Water Alliance, and Puget Sound Energy) that this corridor will be available for public transportation uses, such as HCT or bus transportation. Port of Seattle acknowledged that changes in East Link Project designs would affect the former BNSF Railway corridor, such as the Downtown Redmond Station and the storage track.

7.4 Comments Received from Organizations

Comments on the East Link Draft and SDEIS from organizations have been grouped into those representing businesses, residential, or interest groups.

7.4.1 Businesses and Business Groups

7.4.1.1 Business Groups

- Bellevue Downtown Association
- Bellevue Chamber of Commerce
- Greater Redmond Chamber of Commerce

7.4.1.2 Individual Businesses

- adrugstore.com
- Advanced Family Medicine, PLLC, ND
- Autologic
- Barrier Properties LLC
- Beacon Capital Partners
- Bellevue Arts Museum
- Bellevue Club
- Bellevue Lincoln Plaza, LLC
- Bellevue-Redmond Physical Therapy Center
- Bloch Management LLC
- Campbell Media Research
- Carl Warren & Company
- Castle Harbor
- Charles Schwab
- Clark Nuber
- Coca Cola Bottling Company
- Colliers International
- Commons Medical Building
- Dahlgren Family Properties
- Docomomo WEWA
- Eastside Oral Surgery Associates
- Eastside Tool and Rental
- Envelopes Unlimited
- Express Construction
- Fitch & Ludwick
- Freiheit & Ho Architects
- GNP Rly
- Greenbaum Home Furnishings
- Gruman Nicoll
- Hal Woosley Properties
- IBG Enterprises
- Jack & Jill Daycare & Pre-School
- Kemper Development Company
- Legacy Companies
- Main Street Dental
- Meydenbauer Center
- Microsoft Corporation
- Miles Construction NW
- Morris Piha Real Estate Services
- Nickols Realty
- Nine Lake Bellevue Owners
- North Creek Law Firm
- Overlake/Group Health/Seattle Children's Hospital
- Overlake Internal Medicine Associates
- Pine Forest Properties

- PRiNTA Systems
- Proliance Sport Therapy and Rehabilitation
- Property Development Corporation
- PS Business Parks
- Qualstar Credit Union
- RBJK Ventures LLC
- Red Lion Associates, Property Oversight
- Red Lion Hotels Corp.
- Redmond Medical Center
- Robertson & Assoc Commercial Real Estate LCC
- Rosen Properties
- Run Investment
- Schnitzer West
- Sears Holdings Corp
- Sign Pros
- Sunset Glass Co.
- The Evans Company
- The Pumphouse Bar and Grill
- TRF
- Universal Mechanical Service Co.
- Wright Runstad & Company

7.4.1.3 Draft EIS Business Group Summary

Business groups that submitted comments during the Draft EIS varied from individual businesses with concerns about potential impacts on their property to business-sponsored organizations, such as the chambers of commerce from Bellevue and Redmond. Still others who submitted comments are developers desiring to preserve or enhance the vitality of their property or properties.

The Bellevue Downtown Association recommended that Alternatives B3 (if modified), B7, and C3T, and D2A (if modified) be brought forward for further review in the Final EIS, stating that these alternatives are the most consistent with Downtown Bellevue's long-term economic, transportation, and land use goals and balance fewer negative impacts with stronger system ridership. For Segment B, they expressed a preference for Alternative B3 (modified to be east side running) over Alternative B7 but stated that both B3 and B7 should move forward for additional study in the Final EIS. They supported Alternative C3T because it would have the fewest surface mobility impacts during both construction and operation; it is the shortest, fastest and most cost-effective tunnel option and promotes the most ridership; and it avoids the potential impacts associated with cut-and-cover construction and reconstruction of the Bellevue Transit Center.

The Bellevue Chamber of Commerce stated its support for the Vision Line (B7, C2T, and D2A) because of fewer potential impacts on neighborhoods; less traffic impact and business disruption from construction; less property acquisition; fewer park impacts; and its function as a safe, reliable train service to convenient stations. The Chamber urged rejection of Alternative D5 based on the need to preserve SR 520 right-of-way capacity for the Bel-Red corridor and Overlake neighborhood.

The Greater Redmond Chamber of Commerce supported an East Link corridor that is the most affordable, stating that cities that choose any other alternative other than a surface rail line should bear the responsibility of required funding beyond the affordable surface option costs. They also supported Alternative D3 with modifications and fully support Alternative E2. The Chamber was also concerned that efforts be made to relocate impacted businesses in Redmond.

The Meydenbauer Center, Bellevue's convention center, expressed serious concerns with Alternatives C1T and C2T. It was concerned about potential negative construction impacts on NE 6th Street that could affect the operations of the center; long-term traffic impacts due to reduction of lane capacity and access restrictions on NE 6th Street, which is also a primary transit bus access road; and aesthetic quality of the tunnel portal.

Overlake/Group Health/Seattle Children's Hospital stated either the Ashwood/Hospital Station or the Hospital Station could serve their needs. They requested the relocation of the Hospital Station to the north closer to the hospital employee garage, thus allowing for a safer pedestrian crossing of 116th Ave NE at NE 10th Street to maintain traffic flow. The hospitals were concerned about potential emergency vehicle access and traffic impacts with the Ashwood/Hospital Station and the at-grade crossing at 116th Avenue NE. Due to pedestrian safety concerns, the hospitals requested this station alternative include an elevated pedestrian crossing of NE 12th Street.

The Red Lion Hotel objected to Alternative C8E and staging for tunnel alternatives that connect from Alternatives B3 and B7. Additionally, the Bellevue Club wrote several letters and collected over 985 member signatures opposing alternatives traveling up 112th Avenue SE, such as Alternatives B2A and B2E, which connect to above-grade Segment C alternatives, or Alternative B3 that would reduce their parking.

Many, if not most, of the businesses whose property would need to be acquired by one or more alternative expressed concern about these acquisitions. They urged Sound Transit to choose an alternative that

spared their property or business due to the hardship that would result from sale and/or relocation. Concerns about potential property impacts were expressed most frequently about the business property impacts in Segment D or the connections to Segment D from Segment C at the NE 12th Street crossing of I-405. This crossing concerned several hospital, medical, and office businesses. While the Redmond Chamber of Commerce favored Alternative D3 because it would result in fewer business impacts, several individual businesses along the NE 20th arterial felt more impacts would result from D3 than would result from Alternative D2A.

Costs and financing issues were raised in the consideration of alternative preferences, or as reasons to build some alternatives over others. Alternative B7 was perceived as the lowest-cost alternative, while others, including different business groups, mentioned that it is the least cost-effective. While tunnels are the most costly, it was also mentioned that tunnels have long life spans and could preserve vitality in Downtown Bellevue.

Economic loss was a frequent concern among business groups listing the economic hardship of lost parking as well as the burden of construction on businesses. Some mentioned concern about the economic impacts of the potential visual impacts on an elevated guideway. Almost equally important among business groups was the possible traffic impacts of the project. Common themes for transportation concerns included potential loss of access, congestion during construction, reduction of roadway capacity, loss of HOV mobility, and overall increase in congestion. Of secondary concern, business commenters listed potential visual impacts of the elevated profile in Segments C and D, and whether or not alternatives met the adopted land use and growth plans in Segments C, D, and E. They also listed concerns about potential noise and vibration impacts on medical diagnostic equipment with Alternative D3.

7.4.1.4 SDEIS Business Group Summary

The Bellevue Downtown Association expressed preference for *Preferred Alternative C9T* because of its speed, safety, reliability, access, proximity to the downtown core, compatibility with downtown land uses, and the ability to keep the Bellevue Transit Center open during construction. The Bellevue Downtown Association requested that the VISSIM Analysis conducted jointly by Sound Transit and the City of Bellevue and graphics of walking distance and visualizations developed during the downtown alternatives study be included in the Final EIS, along with analysis of an entrance to the Bellevue Transit Center Station that is directly adjacent to or within the Bellevue Transit Center. The Bellevue Downtown Association also requested the consideration of including additional video or noise simulations. The Bellevue Downtown Association would like to be involved with Sound Transit and the City of Bellevue regarding mitigation planning, and requests that this planning begin as soon as possible to address long-term noise, access, and other environmental impacts during construction.

The Greater Redmond Chamber of Commerce expressed continued support for the project and specifically *Preferred Alternative D2A*.

Most individual businesses supported the project but had specific concerns regarding impacts on their specific location, primarily related to construction access, noise, and vibration, as well as operational traffic, access, and noise. In Segment C, Beacon Capital Partners expressed concern regarding access to office towers they own. Nickols Realty submitted comments on behalf of commercial tenants at several properties they manage within Segment D, and expressed concerns about future land uses, noise, vibration, access, and traffic impacts. Rosen Properties, which also manages a commercial property in Segment D, had similar concerns as Nickols Realty regarding parking, business displacements, and changes in transportation capacity on local roadways. Property Development Centers, which owns the Safeway Beverage Plant on 124th Avenue NE, expressed concern regarding impacts on their facility from the 120th Station (both retained cut and at-grade) and access to their property.

Two business owners adjacent to the Hospital Station, the Pumphouse Bar and Grill and RBJK Ventures, were concerned with impacts on parking and maintaining access to their businesses during construction and operation. The Pumphouse Bar and Grill was also concerned with noise and vibration impacts, and RBJK Ventures requested more detailed information about displacements.

Some businesses suggested changes to the *Preferred Alternatives*, such as *Preferred Alternative B2M* crossing 112th Avenue SE at SE 15th Street instead of SE 6th Street, as suggested by the Bellevue Club, and placing a station on the west side of 112th Avenue SE near Main Street, suggested by the Red Lion Hotel. Both businesses supported *Preferred Alternative B2M*. Bellevue Lincoln Plaza supported Alternative B7 and expressed concerns regarding noise, traffic, soil conditions, and topography related to *Preferred Alterative B2M*.

Kemper Development Company submitted comments regarding traffic in Segments A and B, land use, access, general operations, and the project Purpose and Need. The Meydenbauer Center expressed support for *Preferred Alternatives B2M, C11A*, or *C9T,* with a preference for *Preferred Alternative C9T,* and expressed concerns about Alternative B7.

Microsoft and Wright Runstad & Company supported the changes to *Preferred Alternative D2A* but also had concerns about utility conflicts on their properties. Puget Sound Energy identified utility conflicts for the alternatives analyzed in the SDEIS. Wright Runstad & Company also suggested deferring the 130th Station and requested the project be constructed at least to the 120th Station, and to keep the project on schedule. Two businesses, Evans Industrial Park and Pine Forest Properties, requested that *Preferred Alternative D2A* be designed to minimize impacts on their properties. Some businesses, including Wright Runstad & Company and Kemper Development Company, believe the ridership estimates in Segment D should be higher based on the planned changes in land use in that area.

Two businesses, Eastside Oral Surgery Associates and Miles Construction NW, supported Alternative B7 and opposed the Bellevue Way SE and 112th Avenue SE alternatives, while Express Construction opposed the entire project.

7.4.2 Residential Groups

- Carriage Place Condominiums Home Owners Association
- Bellecrest Neighborhood Association
- Marymoor Heights Condo
- Bellefield Residential Park
- Brookshire Homeowner's Association
- Mercer Park Condominium Home Owners Association
- Surrey Downs Community Club
- Holly Tree Lane Home Owners Association
- Belle Arts Board of Directors

7.4.2.1 Draft EIS Residential Group Summary

There were three predominant segments where residential groups organized to voice their opinions collectively on the Draft EIS: Segments B, C, and E. In Segment B, the residential groups were divided among those who opposed alternatives that used Bellevue Way SE and 112th Avenue SE, thus preferring Alternative B7, and those who opposed B7. The listed concerns for both groups included a potential change in their quality of life, including property acquisition and/or loss of property value, noise, vibration, safety at stations located near neighborhoods, and visual intrusion. Both groups felt that traffic would worsen on the main arterials serving their neighborhood: Bellevue Way SE for residents in Enatai and Surrey Downs and 118th Avenue SE for residents living adjacent to the Alternative B7 corridor. Those living along the Alternative B7 corridor also expressed concern for potential recreation impacts and additional impacts on wetlands from the B7 crossing of Mercer Slough. Similarly, the residents along Bellevue Way SE felt that the blueberry farm, and valuable portions of Mercer Slough and the greenbelt west of Bellevue Way SE would be compromised by the East Link Project.

In Segment C, many residents supported the project and the increase of mobility options. They specifically did not want Alternative C8E, however, which would pass in an elevated profile in front of many condominium complexes north of NE 8th Street, because they feel it would create potential noise and visual impacts.

Finally, in Segment E, comments from residents centered on Alternative E1. Several residents objected to this alternative traversing a hillside south of West Lake Sammamish Parkway, traveling below the grade of, but within view of, multiple condominium complexes. The opposition focused on the potential noise and visual impacts of this alternative. When listing their preference, Alternative E2 was widely listed.

7.4.2.2 SDEIS Residential Group Summary

There were two predominant segments where residential groups collectively organized to voice their opinions on the Supplemental Draft EIS: Segments B and C. In Segment B, the residential groups were divided among those who opposed alternatives that used Bellevue Way SE and 112th Avenue, thus preferring Alternative B7, and those who opposed Alternative B7 and supported *Preferred Alternative B2M*. The listed concerns for both groups included a potential change in their quality of life, including property acquisition and/or loss of property value, noise, vibration, safety at stations located near neighborhoods, and visual intrusion. Both groups felt that traffic would worsen on the main arterials serving their neighborhood: Bellevue Way SE for residents in Enatai and Surrey Downs and 118th Avenue SE for residents living adjacent to the Alternative B7 route. Those living along the Alternative B7 (Mercer Park and Brookshire) route also expressed concern for potential visual impacts from the Alternative B7 crossing of Mercer Slough. Similarly, the residents near Bellevue Way SE (Holly Tree Lane Homeowners Association) felt that the blueberry farm, valuable

portions of Mercer Slough, and the greenbelt west of Bellevue Way SE would be compromised by the East Link Project.

In Segment C, residents of the Belle Arts Condominiums supported a tunnel profile, which they felt would minimize traffic, noise, and visual impacts in Downtown Bellevue. If *Preferred Alternative C11A* were to be chosen, they requested that the bus stop in front of their building be relocated because of the potential increase in bus traffic and noise from the reduced sidewalk width in front of their building.

7.4.3 Interest Groups

- Bellevue Community College
- Bellevue YMCA
- Building a Better Bellevue
- Cascadia Discovery Institute
- Coalition for Effective Transportation Alternatives
- Eastside Heritage Center
- Eastside Transportation Association
- Full Gospel Christian Center
- Friends of Marymoor Park
- Highland Covenant Church
- Low Income Housing Institute
- Sierra Club, Cascade Chapter
- Surrey Downs Historical Society
- Transportation Choices Coalition
- TruthInTaxation/I-90 Users Coalition
- Vision Line Coalition
- Washington Trust for Historic Preservation

7.4.3.1 Draft EIS Interest Group Summary

Eleven community organizations or interest groups submitted comments on the Draft EIS. The Vision Line Coalition is a group formed in response to the East Link Project and endorsed by 17 commercial property owners, businesses, and residents of the Cities of Bellevue and Redmond. The Coalition for Effective Transportation Alternatives (CETA) and the Eastside Transportation Association (ETA) did not support adding light rail to the Eastside, maintaining that bus rapid transit would be a more viable alternative. However, ETA did offer its preference for alternatives in Segments B and C discussed below. These organizations also questioned the technical feasibility of light rail on the floating bridge. ETA also expressed concern and the need for more information regarding potential impacts on freight movement. The I-90 Users Coalition expressed opposition to the project based on concerns regarding freight movement, subarea equity, and technical issues of retrofitting the I-90 floating bridge.

Other interest groups offered their support while expressing concerns about project-specific design considerations and additional analysis being conducted. Transportation Choices Coalition suggested conducting an analysis of joint use of the I-90 center roadway by buses and light rail. In Segment B, the Vision Line Coalition endorsed Alternative B7 and requested further study of a modified Alternative B3, as proposed by the City of Bellevue. They echoed concerns of the residential interest groups, including potential light rail impacts on traffic operations, pedestrians and traffic circulation, safety, property acquisition, and noise (on residents and wildlife), and minimizing wetland impacts. ETA expressed its preference for Alternative B7 due to less congestion, fewer neighborhood impacts, and reduced property acquisition and maintenance of future roadway capacity. Transportation Choices Coalition voiced its support for Alternative B1 for its service to dense development areas and areas in Old Bellevue anticipated for future growth.

Eastside Heritage Center, the historical organization on the Eastside and the tenant of the Winters House, does not support the removal or degradation of the Winters House, a nationally registered historic property. They asked that if the preferred route is along the east side of Bellevue Way SE, that they be consulted in the preservation and mitigation that would be required. Regarding traffic concerns in Segment B, one suggestion is to widen Bellevue Way SE before implementation of the East Link Project as mitigation to the potential traffic impacts of the project. The Cascadia Discovery Institute questioned possible freight impacts on the former BNSF Railway corridor, questioned future use impacts from stations near the hospitals, and would like to make sure that the project does not preclude the potential for a trail and the Eastside Corridor Commuter Rail project within the former BNSF Railway corridor.

Interest groups that commented on Segment C, such as Transportation Choices Coalition, the Vision Line Coalition, and the Eastside Transportation Association, expressed strong preference for the tunnel alternatives, the latter two particularly supporting Alternative C2T. Elevated alternatives were strongly rejected for their potential visual intrusion and noise impacts, except by the Sierra Club, which supported Alternative C8E. The Sierra Club also supported Alternative C4A because it would increase pedestrian accessibility. Conversely, several comments listed pedestrian safety as the reason they resisted an at-grade alternative. The Vision Line Coalition suggested additional review of the impacts of removing traffic lanes in Downtown Bellevue, the

potential economic impacts of reduced on-street parking and elevated guideways on rental markets, and re-evaluation of the visual assessment for all above-grade alternatives. The Vision Line Coalition listed potential impacts on McCormick Park and relocation of medical facilities as reasons for not favoring alternatives that cross at NE 12th Street. In addition, they expressed opposition to an at-grade crossing at 116th Avenue NE, where circulation would be affected and hospital access impeded.

Comments in Segment D varied, but no interest group supported either Alternative D3 or D5. Many mentioned that Alternative D5 does not support the newly adopted Bel-Red Subarea Plan, nor does it reserve potential for future SR 520 expansion. Several expressed concern that Alternative D3 would travel along NE 20th, a heavily traveled arterial. There was generally strong support for Alternative D2A from Transportation Choices Coalition, the Sierra Club, and the Vision Line Coalition (if modified) because it would best support transit-oriented development plans. Also, some doubted that the ridership appropriately considered the future growth plans for this area of Bellevue and Redmond. Both the Full Gospel Christian Center and the Highland Covenant Church expressed opposition to Alternative D3 based on potential impacts on their facilities. Finally, the Cascadia Organization suggested building the project from east to west.

The Friends of Marymoor Park expressed support for Alternative E2, which would travel along SR 520 on Marymoor Park. They expressed concern about how proposed maintenance facility locations in Segment E may potentially impact park access. Transportation Choices Coalition also expressed support for Alternative E2 as a cost-effective alternative. The Sierra Club expressed support for Alternative E4 because it would be more direct. They also felt that either dispersing park-and-ride lots or reducing the parking lot size may influence more transit connections.

7.4.3.2 SDEIS Interest Group Summary

Comments on the SDEIS were received from 10 community organizations or interest groups. CETA did not support adding light rail to the Eastside, maintaining that bus rapid transit would be a more viable alternative. The Transportation Choices Coalition strongly advocated light rail and urged Sound Transit to avoid delays in proceeding with the project. The Coalition also supported *Preferred Alternative B2M* rather than Alternative B7, citing the need for locating light rail and transit stations in locations that would serve the highest population areas, have lower environmental impacts than Alternative B7, and lower overall cost. Other supporters of the *Preferred Alternatives* include the Bellevue YMCA and the Low Income Housing Institute.

The Vision Line Coalition commented that they feel there would be significant adverse environmental impacts that cannot be mitigated with the "B2 options" (alternatives that travel on Bellevue Way SE and 112th Avenue SE) and that the analysis of Alternative B7 is flawed. Of greatest concern with the "B2 options" are impacts on wetlands, the Winters House, noise, light and glare, traffic, and local businesses and neighborhoods. They expressed support for a tunnel in Downtown Bellevue and also feel that the potential for future expansion eastward should be discussed in the Final EIS. They also voiced support for the Building a Better Bellevue analysis, discussed below.

The Building a Better Bellevue organization, formed in response to the East Link Project, submitted a study they prepared detailing concerns they have regarding the cost estimate for Alternative B7 and suggestions for lowering the cost. This organization also recommends a formal investigation be conducted into how the Alternative B7 cost-estimate was developed because they believe it was developed in a way to inflate the costs. Lastly, they also submitted a number of questions regarding the analysis of *Preferred Alternative B2M* and questioned the need for rail banking in the former BNSF Railway corridor.

Eastside Heritage Center expressed their concerns about how the *Preferred Alternative B2M* could affect Winters House and about being relocated during light rail construction. They were concerned about loss of access to the site, increased noise and visual impacts due to construction and operation, and loss of historical character. The Center asked that if they are required to relocate during construction, that similar access and facilities be made available for their use during this time. The Washington Trust for Historic Preservation also commented on similar potential impacts on the Winters House and on the potential Surrey Downs historic district. They felt that removal of homes adjacent to those contributing to the district could result in adverse effects on the district. The Surrey Downs Historical Society believes that *Preferred Alternative B2M* and connections to Segment C along Main Street would adversely affect both the Winters House and the potential Surrey Downs historic district. They were concerned with noise, construction, and vibration impacts on both historic resources and feel that construction and operation of *Preferred*

Alternative B2M and the alternatives along Main Street would change the character and context, and diminish the value of the Surrey Downs neighborhood. They recommended selection of Alternative B7 to avoid impacts on historic resources in accordance with Section 106 of the National Historic Preservation Act and of the Section 4(f) of the Department of Transportation Act. The Surrey Downs Historical Society believes that Alternative B7 has not been sufficiently studied and requests that Sound Transit wait for the study being prepared by the City of Bellevue before an alternative is selected.

Representatives for Bellevue College (formerly Bellevue Community College) submitted multiple comments requesting transit service be provided between the college and the South Bellevue Station, and noted the large number of students and employees that commute from Seattle who would be able to use the proposed project.

7.5 Response to Common Comments

Appendix J of the Final EIS includes responses to each comment received during both the Draft EIS (Section J.1) and the SDEIS (Section J.2). Both of these sections are organized much like this summary, in order of agency, organization, residents, interest groups, and individuals. In order to provide some specific responses to common comments received, Table 7-1 is organized by the chapter and resources order as found in this Final EIS. These responses are also referenced in the individual responses to comments using the identifying code found in the left column of the table. Commenters also suggested additional alternatives to be studied.

TABLE 7-1
East Link Draft EIS – Responses to Common Comments

Common Comment No.	Common Theme	Common Response
1. Purpose and Need		
CC1a	Why is bus rapid transit (BRT) or increased bus service not included as an alternative?	BRT, as an alternative for East Link, was eliminated during the Sound Transit Long-Range Planning and ST2 process. (Please see Section 1.3 in Chapter 1, Purpose and Need for East Link Project.) As stated in Chapter 1, the purpose of the East Link Project is to expand the Sound Transit Link light rail system from Seattle to Mercer Island, Bellevue, and Redmond via Interstate 90 and to provide a reliable and efficient alternative for moving people throughout the region. Light rail provides the highest level of ridership and the shortest travel times of all technologies evaluated in the corridor.
CC1b	Why do alternatives not include service to other Eastside communities such as Eastgate, Factoria, Issaquah, North Bend, Snoqualmie, Renton, Kirkland, Woodinville, and Bothell?	East Link is part of ST2, the next phase of mass transit improvements in the Puget Sound Region approved by the voters in 2008. Light rail extensions to these other locations were not included in the ST2 program. As stated in the project Purpose and Need statement, the purpose of the project is to connect Seattle to Mercer Island, Bellevue, and Redmond because this corridor has the highest ridership potential. Sound Transit's Long-Range Plan envisions potential rail extensions to Issaquah but does not envision high-capacity transit extension east beyond Redmond or Issaquah. Future extensions as part of Sound Transit's Long-Range Plan will address adding high-capacity transit service to Factoria, Eastgate, Issaquah, Kirkland, Renton, Bothell, and Woodinville. North Bend and Snoqualmie are outside Sound Transit's service area.
2. Alternatives Considered		
CC2a	Please use federal stimulus money to facilitate faster project implementation.	The 2008 stimulus package, also known as the American Recovery and Reinvestment Act, is designed to quickly inject money into the economy by using pre-existing programs, criteria, and funding methods. It is focused on job creation through funding of "shovel ready" or "ready-to-go" infrastructure projects. East Link project is in the planning stage and does not currently qualify for federal stimulus money.
CC2b	More detail for mitigation measures is needed, and mitigation should be included in cost estimates.	The EIS describes mitigation measures consistent with the current level of project design and the requirements of the environmental review process. Mitigation measures will be refined through final design and as the project goes through the permitting process. As stated in Section 2.5 of Chapter 2, Project Alternatives, the Record of Decision for East Link issued after the Final EIS would include a list of committed mitigation measures for the project to be built. Costs to implement mitigation measures were included as part of the cost estimates prepared for the EIS as described in Section 2.6.2. See also Response to Common Comment CCG3.

TABLE 7-1 CONTINUED
East Link Draft EIS – Responses to Common Comments

Common Comment No.	Common Theme	Common Response
CC2c	Cost comparisons should include the costs to the community.	The cost estimates consist of project construction costs, including property acquisition, light rail facilities, and anticipated mitigation for project impacts, as well as costs for design, permitting, and project management. Section 2.6 in Chapter 2, Alternatives Considered, provides additional information about cost methodology. Benefits and impacts to the community, such as increases to property values, travel time savings, environmental benefits of reduced pollution, inconvenience due to construction, visual, or other impacts, are discussed in the EIS but not included in the costs of the project.
CC2d	Why does the project not include an alternative across the State Route 520 floating bridge?	High-capacity transit (HCT) on SR 520 was considered during the Sound Transit Long-Range Planning and ST2 process, and the Sound Transit Board determined that I-90 is the preferred corridor for HCT across Lake Washington. The WSDOT and Sound Transit Trans-Lake Washington Study (1998-2002) analyzed options for HCT across Lake Washington and reaffirmed that I-90 was the preferred cross-lake corridor for HCT between Seattle and the Eastside for several reasons: directing Eastside riders to the UW would overcrowd the already heavily travelled corridor to Downtown Seattle; connecting to Downtown Bellevue and east to Overlake would require a circuitous route; construction would be difficult and expensive in order to connect with the University of Washington Station, which is 100 feet below grade. An alternative rail line into Downtown Seattle would be needed or riders would be required to take a forced transfer, thus decreasing travel efficiency.
CC2e	Select an alternative that does not preclude future light rail expansion.	All alternatives provide opportunities for future light rail expansion consistent with the Sound Transit Long-Range Plan. The Bellevue Way SE and the former BNSF Railway corridor project alternatives in Segment B have been designed to allow for future extensions to Issaquah with a wye junction. Kirkland and Renton are planned to be served by a potential light rail extension according to the Sound Transit Long-Range Plan. The Long-Range Plan does not envision light rail extension beyond Downtown Redmond.
CC2f	Will selection of Alternative B7 preclude use of the former BNSF Railway corridor for commuter rail?	Alternative B7 would not preclude use of the corridor for commuter rail. Alternative B7 has been designed to accommodate a planned trail by King County (or a reactivated freight/commuter rail service) in most places. Some of the areas are narrow and would require small right-of-way acquisitions. Please refer to Appendix G1, which illustrates the location of light rail with the corridor for trail/utilities/rail uses, along with a representative cross section.

TABLE 7-1 CONTINUED
East Link Draft EIS – Responses to Common Comments

Common Comment No.	Common Theme	Common Response
CC2g	The following B7 Route elements presented in Sound Transit's DEIS and SDEIS reports raise significant questions as to their necessity and/or sufficiency of analysis: 1. A Redundant and Costly New Bike and Walking Trail 2. A Wide Project Footprint With Questionable Rail Line Placement 3. An Excessively Large Park and Ride Facility Placed Near Sensitive Areas, Requiring the Taking of Expensive Private Property 4. Bridge Structure Across the Slough Constructed Using Costly Methods 5. Failure to Utilize Unused Roadside Right of Way Along the West Side of I-405, Requiring the Taking of Expensive Commercial Property 6. Environmental Risks Overstated	1. If Sound Transit uses the former BNSF Railway corridor for light rail, it must accommodate a trail and the possible return of freight. The Alternative B7 design accommodates a bicycle/pedestrian trail because of contractual responsibilities to the Port of Seattle (the corridor owner) and King County (the trail sponsor and trail easement owner). There are also limitations on the use of "railbanked" freight rail corridors. 2. The Woodinville Subdivision (part of the former BNSF Railway corridor used in the B7 alignment) is railbanked in accordance with the National Trails System Act of 1983 (NTSA) (16 U.S.C. 1247 (d)). Sound Transit's design of the Alternative B7 alignment will accommodate a freight track. The space necessary to accommodate a freight track is also enough to accommodate a multi-use trail. The B7 corridor footprint in the Sound Transit early design options (about 5 percent engineering) is largely dictated by the need to protect the railbanked status of the corridor. 3. The 118th Station is located at the proposed site because there was not adequate room at the existing Wilburton Park-and-Ride Lot for a station and the route would travel through these commercial properties and displace some of these businesses without the station. The station location would allow the station and parking garage to be constructed in an already developed area that would avoid impacts on sensitive areas. 4. The Final EIS describes that construction of the elevated light rail could take place from a temporary work trestle, which is a conventional method of construction for sites over water, over structurally weak soils, or in environmentally sensitive areas. Generally, a work trestle consists of short spans of steel and/or timber stringers and deck, supported by timber or steel piling. The trestle is used to support cranes or excavation equipment, and provide a haul route for construction materials and spoils while protecting the terrain below. The proposed construction method is a reasonable assumption at this stage of design. While the cost of the temporary work trestle is significant, any alternative method would also have cost associated with building in poor soils and over water. 5. Sound Transit's Alternative B7 alignment accommodates WSDOT's I-405 Master Plan for expanding I-405. Those plans call for highway expansion primarily to the west of the existing I-405, not to the east as stated in the Build a Better Bellevue report. 6. Peer reviews of Sound Transit work commissioned by the City of Bellevue found that environmental impacts are not overstated for Alternative B7. The peer reviews found: "Sound Transit's East Link Draft EIS fairly compares the B7 alignment with other Segment B alternatives. The technical approach and methodologies used to evaluate the environmental impacts of B7 are generally consistent with professional standards in the various disciplines" (David Evans Assoc, 2010).
3. Transportation		
CC3a	The no-build analysis should include the I-405 Bus Rapid Transit (BRT) plans.	WSDOT has published a programmatic Final EIS for the I-405 Master Plan. Within this document WSDOT identified bus rapid transit (BRT) as a component to the I-405 Master Plan, but has not conducted a specific environmental assessment of implementing an I-405 BRT system. As such, the implementation schedule and funding for this BRT system is not known at this time and the East Link EIS has not assumed BRT on I-405 as part of the No Build analysis. This complies with environmental regulations that only likely foreseeable planned and programmed projects are assumed in the no build condition.
CC3b	Will communities near stations experience hide-and-ride parking due to the lack of park and ride facilities or overcapacity park and ride facilities?	The potential for hide-and-ride parking at light rail stations and park-and-rides is expected to be low, as described in Section 3.6.3 of Chapter 3, Transportation Environment and Consequences. There is limited available on-street parking surrounding most of the proposed stations, and parking surrounding the proposed stations is often restricted by the local jurisdictions. It is expected that people not able to park at a park-and-ride station will either use another station that has available parking or over time, change their mode of travel to reach the station. Sound Transit would work with the local jurisdictions to limit on-street parking, if appropriate, and reduce the potential for hide-and-ride occurrences.

TABLE 7-1 CONTINUED
East Link Draft EIS – Responses to Common Comments

Common Comment No.	Common Theme	Common Response
CC3c	Will the East Link Project create more roadway congestion, especially near stations, and is more traffic mitigation needed to reduce this congestion?	The East Link project would reduce vehicle miles travelled (VMT) and vehicles hours travelled (VHT) in the region as described in Section 3.3.3 of Chapter 3 because greater than 10,000 new transit riders would use the light rail system every day with the project. The traffic operation analysis is described in Section 3.6.3 of the Final EIS. In general, the analysis predicted that, for light rail along at-grade profiles or elevated within the roadway right-of-way, intersections would generally operate at a level of service (LOS) similar to that of the No Build Alternative, although a few intersections in the study area may degrade depending on the alternative and intersection movements. This is partly because a similar roadway capacity is provided in most cases with East Link, but also because light rail trains are generally able to safely travel through intersections without substantial signal timing adjustments. For alternatives with either elevated or tunneled sections, intersections in general are expected to operate similar to the No Build because these profiles are generally outside the roadway right-of-way. Intersections near potential stations are expected to operate in most cases at an LOS similar to No Build, although intersections immediately adjacent to stations with park-and-ride facilities may operate worse than No Build. Where impacts are identified, which consists of intersections that degrade below the LOS standards of the jurisdiction due to East Link, improvements to mitigate the impact are proposed and described in Section 3.6.5 of the Final EIS.
CC3d	Bellevue Way is already congested and the South Bellevue Station will increase that congestion.	Traffic operations along Bellevue Way SE are discussed in Section 3.6 of Chapter 3, Transportation Environment and Consequences, which has been updated for the Final EIS. Two roadway modification options are proposed to improve the station and neighborhood access along Bellevue Way SE near the South Bellevue Station. The first option would install traffic signals along Bellevue Way SE at the south driveway to the South Bellevue Station and at SE 30th Street and convert the center two-way left-turn lane from the South Bellevue Station to I-90 into a southbound HOV lane. Some turn restrictions are included with this option and are described in Section 3.6.3 in the Final EIS. The second option would install a traffic signal at Bellevue Way SE and the south driveway to the South Bellevue Station. With this signal, northbound U-turn movements would be allowed at this intersection. No changes to property access and circulation along Bellevue Way SE would occur south of the south driveway in this option. With either of these two options, traffic congestion along Bellevue Way SE would be similar between the No Build and build alternatives that include a South Bellevue Station.
CC3e	118th Avenue SE will be too congested with the 118th Station.	Additional intersections along 118th Avenue SE have been included in the Final EIS traffic operations analysis to document associated impacts. This information is provided in Section 3.6 of the Final EIS. With the 118th Station (Alternative B7), two intersections along 118th Avenue SE and Coal Creek Parkway would be affected, but both of these intersections can be mitigated.
CC3f	The ridership estimates for Alternative B7 seem low.	Appendix A (Attachment 3) of Appendix H1, Transportation Technical Report, provides a general overview of how the Sound Transit Ridership model produces ridership forecasts. Among the many factors that the model takes into account to produce transit ridership are the adopted Puget Sound Regional Council (PSRC) land uses, population density, parking costs, transit fares, household income, and highway travel time for various modes. Also included are observed transit travel patterns such as passenger origin and destination, and transit service characteristics such as bus access, frequency, and hours of service. As input into the model, Sound Transit and King County Metro service planners developed an integrated rail/bus services plan for 2020 and 2030. The work identified the appropriate and likely bus service for Alternative B7 and specifically at the 118th Station. The service planners determined that bus service for the areas east (along I-90) and south use I-90 to enter Seattle and are not likely to be rerouted north to the 118th Station because of the out-of-direction travel and impacts on the bus reliability that would be created by traveling north along I-405 and having to turn back and continue their route. Similarly, the model predicts that people driving from the communities to the east and south of South Bellevue and heading into Seattle are not as likely to use the 118th Station and instead would shift travel patterns to the surrounding stations such as the Mercer Island Station in Segment A, which is a direct connection along their route and anticipated to have higher daily boardings if Alternative B7 is selected. Results from the ridership model estimate that Alternative B7 is expected to have projectwide ridership lower than other Segment B alternatives. By 2030, projectwide ridership would range from a daily low of 46,000 with Alternative C14E connected to B7 to a daily high of 52,500 for Alternative B1 connecting to C1 or C3T. Daily ridership differences can be considered substantial if the forecast variation among alternatives for projectwide East Link ridership exceeds about 2,000 daily boardings.

TABLE 7-1 CONTINUED
East Link Draft EIS – Responses to Common Comments

Common Comment No.	Common Theme	Common Response
CC3h	The ridership estimates and traffic impact analysis should include the land uses adopted in the City of Bellevue's Bel-Red Subarea Plan and the City of Redmond's Overlake Master Plan.	The Puget Sound Regional Council travel demand and Sound Transit ridership models used in the East Link Project Draft EIS to forecast the future travel and ridership information did not reflect the City of Bellevue's Bel-Red Subarea Plan and the City of Redmond's Overlake Master Plan because they were not adopted prior to publication. With the recent adoption of these plans, the ridership and traffic impact analysis in this Final EIS has been updated to reflect these plans and associated adopted transportation projects. Refer to Appendix A of Appendix H1, Transportation Technical Report, for the list of transportation projects included in the No Build Alternative from these two adopted plans.
CC3i	What are the impacts of construction on traffic?	An updated and more refined assessment of the construction period is discussed in Section 3.6 of Chapter 3, Transportation Environment and Consequences. The methodology for this construction analysis is located in Appendix A in Appendix H1, Transportation Technical Report. As part of this assessment, the number of construction vehicles and potential haul routes are provided based on the level of information known at this time. In addition, potential roadway lane closures and their impacts on traffic operations, parking impacts, transit service disruptions, neighborhood cut-through traffic, and detour route opportunities are also described in this Final EIS by alternative. In general, most alternatives limit construction impacts to one side of the road because the project is outside the roadway right-of-way. When alternatives are within the roadway right-of-way or require cut-and-cover tunneling activities, traffic impacts are expected to be more noticeable. There would be intermittent road or lane closures and detour routes would be needed. Business and property accesses would be maintained to the extent possible either in their current locations or through nearby accesses.
CC3j	How will at-grade alternatives affect access (driveway closures, loss of turn movements, safety, increased congestion) to adjacent properties, such as along Alternative C4?	To provide quality service, at-grade train operations require a safe environment for vehicles and pedestrians to cross the light rail tracks. Therefore, when the light rail track is located within a roadway, driveway access will be modified to only allow turns at protected locations (where a traffic signal or gate or another appropriate type of signal can be provided) across the light rail tracks. This will change some full access driveways to only allow right-in, right-out movements. U-turns are proposed at the nearest practical signalized intersection to continue providing convenient access to and from these properties. Where a driveway is closed, alternative access will be provided, if not already available, to the property. This information is provided in the conceptual drawings provided in Appendix G1. In each case, change in trip patterns and vehicle circulation has been accounted for in the transportation analysis. Appendix E in Appendix H1, Transportation Technical Report, provides a summary of the relevant national studies conducted on light rail safety for various track alignments. The traffic operations under the various at-grade alternatives are described in Section 3.6.3 in Chapter 3, Transportation Environment and Consequences. In general, at-grade alternatives in Downtown Bellevue are not expected to substantially affect the overall downtown street operations, but there would be impacts on intersections along and nearby the alternative. Where impacts are identified, roadway improvements are proposed as mitigation. Where roadway improvements are not feasible, operational traffic management would be proposed at these locations in lieu of roadway capacity improvements. To further support these conclusions, a review of the potential at-grade light rail operations in Downtown Bellevue was conducted by a panel of traffic engineering and transit operations professionals from Portland, Denver, and San Diego. Based on their extensive experience in all three cities, the panel concluded that the at-grade surface alternatives included in the Final EIS would have impacts on traffic operations that are similar to the impacts of other surface light rail systems in the comparable environments of Downtown Portland, Downtown Denver, and Downtown San Diego. The panel noted that most of the changes in forecast future traffic operating conditions in Downtown Bellevue are the result of traffic volume growth and not the introduction of surface light rail. Section 3.7 in Chapter 3 of the Final EIS and Section 7 in Appendix H1 describe the pedestrian circulation and safety with the East Link Project. Potential pedestrian treatments that have been incorporated into other at-grade light rail systems across the U.S. include additional signage, crosswalks and lighting, unique pedestrian signals and gates, sidewalk railings, painted crosswalks, audible alerts, and uniquely textured pavement. These types of treatments are potential design features that could be included, if appropriate, as elements in the design of the selected alternative.

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East Link Draft EIS – Responses to Common Comments

Common Comment No.	Common Theme	Common Response
CC3k	How will bus service be changed with the East Link project?	As described in Section 3.4 of Chapter 3,Transportation Environment and Consequences and detailed in Section 4.3 of Appendix H1, Transportation Technical Report, as part of the East Link Project, King County Metro and Sound Transit service planners developed a projected rail/bus service for the project. A discussion is included in Chapter 3. Metro and Sound Transit routes would be refined to develop an integrated transit network with transit hubs at many East Link stations. Some routes would be eliminated where bus service duplicates light rail service and other routes would be modified to end and begin at light rail stations.
CC3l	What are the impacts of the East Link project to bus travel on I-90?	Funding to complete the I-90 Two-Way Transit and HOV project is included in the ST2 package approved by voters in November 2008. This project will complete the I-90 HOV lanes to Seattle on both westbound and eastbound directions prior to the East Link construction on I-90. As discussed in Section 3.5.3 of Chapter 3, Transportation Environment and Consequences, with the addition of these outer roadway HOV lanes and joint rail-bus use of the D2 Roadway, the East Link Project shows up to a 3 minute improvement in the reverse-peak direction and up to a 3 minute impact in the peak direction on bus transit travel time across I-90 compared with the No Build Alternative. If use of the D2 Roadway is not designated as joint use for bus and light rail, bus travel times across I-90 would increase by up to 4 minutes in year 2030 during the PM peak hour as buses are rerouted to other roadways to access Downtown Seattle. Potential mitigation for bus service without joint use in the D2 Roadway is described in Section 3.4.5 of Chapter 3 and would be further examined during the design phase of this project, including transit signal priority on 4th Avenue.
CC3m	How will East Link construction impact transit service and transit facilities such as park and rides?	Existing transit service routes would continue with revisions to serve transit stations and potentially relocated park-and-ride parking. For more information, construction impacts and mitigation of impacts to transit service and park-and-rides is discussed in Sections 3.4.4 and 3.4.5 of Chapter 3, Transportation Environment and Consequences. Additional coordination with King County Metro and Sound Transit Regional Express service will occur as detailed construction plans regarding transit service are developed during the final design and permitting phase of the East Link project.
CC3n	Can the I-90 floating bridge structure support the light rail?	*Preferred Alternative A1* has several design considerations regarding the compatibility of light rail with the I-90 floating bridge, Alternatives Considered. The Washington State Legislature Joint Transportation Committee commissioned an independent review team (IRT) to evaluate the bridge design with light rail. The IRT concluded that all issues identified as potentially affecting feasibility can be addressed. See Section 2.3.2 of Chapter 2 for further information.
CC3o	What is the traffic and freight impact of use of the I-90 center lanes for light rail?	The East Link Project would require dedication of the I-90 center roadway for high-capacity transit, as stipulated in the 1976 Memorandum Agreement (as amended in 2004) by Seattle, Mercer Island, Bellevue, King County Metro, WSDOT, and Sound Transit. HOV lanes are being built on the outer roadways in a three-stage project known as the I-90 Two-Way Transit and HOV Project, allowing HOVs to travel in both directions any time of the day. The entire I-90 Two-Way Transit and HOV Project would need to be constructed prior to the East Link Project so that HOV traffic can be moved from the center roadway to the outer roadways. When compared to the No Build Alternative, travel times across I-90 for vehicles and trucks would improve or remain similar with East Link as the transit mode share (or percentage of people using transit) would increase on I-90 with light rail. Although congestion would still occur on I-90 with the East Link Project, it would be shorter in duration and affect a smaller area as people shift to use light rail. Light rail would not only provide an increase in transit use but also allow more people to cross Lake Washington on I-90. Compared with the No Build Alternative, East Link would increase the number of people able to travel across I-90 without adding lanes. I-90 travel time and throughput information is provided in greater detail in Section 3.5.3 of Chapter 3, Transportation Environment and Consequences. The East Link Project has the capacity to comfortably carry 600 persons per 4-car train and 800 persons with crowded conditions. Therefore, with the project, the center roadway would have a peak-hour capacity of up to 18,000 to 24,000 people per hour, equivalent to between 6 to 10 freeway lanes of traffic.

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East Link Draft EIS – Responses to Common Comments

Common Comment No.	Common Theme	Common Response
CC3p	What is the traffic and bus service impact of removing the HOV direct access ramps between I-90 and Bellevue Way?	Segment B alternatives would exit I-90 either at-grade on existing HOV ramps to/from Bellevue Way or elevated over the westbound I-90 lanes. Alternative B1 would require removal of the eastbound HOV off-ramp and the westbound HOV on-ramp. The remaining Segment B alternatives would have an elevated connection across westbound I-90, allowing the preservation of HOV direct access to westbound I-90, but would have the option to either close or keep open the eastbound HOV off-ramp from I-90 to Bellevue Way SE. Keeping the ramp open would require reconstructing the ramp and making other interchange modifications. WSDOT has indicated it will require both ramps to remain for HOV use. With the option to remove the eastbound direct-access HOV off-ramp to Bellevue Way, Alternatives B2A, B2E, B3, and B7 would not affect HOV travel times to Bellevue Way because of the low level of congestion between Mercer Island and the Bellevue Way interchange. Alternative B1 would remove the westbound direct-access HOV on-ramp from Bellevue Way SE, which would increase travel times for westbound HOV users by 10 to 12 minutes. With any of these Bellevue Way HOV direct-access options, the general purpose traffic on I-90 would not be affected. The potential closure of the HOV direct-access ramps would not affect bus service because buses currently using these ramps are planned to be eliminated with the project, except for with Alternative B7. With this alternative, one transit route would be rerouted to the general-purpose ramp if the eastbound HOV direct-access off-ramp is closed.
CC3q	Alternatives along Bellevue Way will increase traffic on 108th Avenue SE and create an unsafe walk route for Enatai Elementary.	There is not an expectation of a substantial increase in traffic on 108th Avenue SE along the walk route for Enatai Elementary with the project. Please see Section 3.6 for the traffic analysis and neighborhood impacts in Segment B.
CC3r	How will tolling on SR 520 affect traffic on I-90 with the project?	Tolling on SR 520 is assumed to occur in all future year conditions and has been incorporated into the Transportation analysis. Please see Section 3.5 in Chapter 3 for information on SR 520 and I-90 conditions.
Chapter 4 – Affected Environment and Environmental Consequences		
4.1 Acquisitions, Displacements, and Relocations		
CC4.1a	Under one or more alternatives, I will be displaced from my home or business. How will residents and businesses be relocated?	As described in Section 4.1, Acquisitions, Displacements, and Relocations, Sound Transit would comply with appropriate provisions of the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act and the State of Washington's relocation and property acquisition regulations. Property owners whose entire or partial property would be acquired by Sound Transit would receive just compensation for their land and improvements. Just compensation is an amount paid to a property owner for property acquired for public purposes that is not less than the fair market value of the property acquired including damages or benefits to the remaining property. Compensation would include any measurable loss in value to the remaining property as a result of a partial acquisition. Permanent parking lost from partial acquisition would be mitigated through compensation to the property owner or provision of replacement parking. Sound Transit's relocation assistance and advisory services would include, but not be limited to, measures, facilities, or services that may be necessary or appropriate to determine the relocation needs and preferences of each household, business, and nonprofit organization to be displaced. Sound Transit would provide current information on the availability, purchase prices, and rental costs of comparable replacement dwellings. Other benefits and compensation may include payment of residential moving expenses and replacement housing payments, nonresidential moving expenses, and reestablishment expenses. Sound Transit's Business and Residential Acquisition and Relocation handbooks outline compensation and acquisition procedures in detail. Sound Transit is committed to working closely and proactively with residents and businesses to help them plan ahead for relocation, find new homes or sites, and solve problems as they may occur. While relocation assistance would mitigate the displacement, relocation could still represent an inconvenience or hardship to some property owners. Sound Transit has adjusted alternatives during conceptual design to avoid or minimize impacts, including property acquisitions, to the extent possible. This alternative refinement process will continue throughout final design.

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East Link Draft EIS – Responses to Common Comments

Common Comment No.	Common Theme	Common Response
CC4.1b	Displacement of the Commons Medical Building would be a hardship to a large number of businesses and the patients they serve.	In accordance with a Sound Transit Board motion, the Final EIS includes a revised design for Alternatives C3T and C4A that shifts the Ashwood/Hospital Station to the east and avoids the need to use this property as staging. However, Alternatives C7E and C8E would affect this property.
4.2 Land Use		
CC4.2a	How will the proposed transit oriented development legislation, House Bill 1490, affect land use around light rail stations?	The legislation for transit-oriented development (House Bill 1490) did not advance. The bill was opposed by the City of Seattle and other cities based on their interest in preserving local control in zoning and development. The Cities of Seattle, Mercer Island, Bellevue, and Redmond control zoning and development within their jurisdictions. Refer to Section 4.2, Land Use, for information on transit-oriented development associated with East Link alternatives.
CC4.2b	The City of Bellevue should uphold its 1981 commitment to protect the residential neighborhoods from downtown development.	The City of Bellevue controls zoning and development. The project would not result in any changes to how the land is zoned or uses allowed. The East Link alternatives within Downtown Bellevue are located along existing arterials, which would minimize impacts on residential neighborhoods. The project would continue to support that growth be focused in Downtown Bellevue and encourage the use of public transportation as well acts as a catalyst for growth in those areas, including the Bel-Red Subarea where higher densities are encouraged and the land uses have recently been rezoned to support a mix of uses. Refer to Section 4.2, Land Use, for information on existing zoning and how land uses would be affected as a result of the project.
CC4.2c	The Draft EIS does not address all of the relevant goals and polices from the Bellevue Comprehensive Plan.	The plans and policies identified in the comments have been reviewed, and Section 4.2, Land Use, and Appendix F4.2, Land Use Plans, Goals, and Policies, have been updated and expanded as appropriate based upon the relevance of the goals and policies to the project. The discussion in Appendix F4.2 has also been updated to identify the consistency of certain alternatives with the goals and policies. Some of the identified policies are not relevant to the East Link Project and therefore have not been included. East Link is generally consistent with the City's policies and goals.
CC4.2d	Information from the City of Bellevue's Light Rail Best Practices Report should be included in the EIS, and the project should be consistent with the recommendations in the report.	Section 4.2, Land Use, in Chapter 4, and Appendix F4.2, Land Use Plans, Goals, and Policies, have been updated to include information on the Light Rail Best Practices Report. The cross-referenced goals and policies from the City of Bellevue Comprehensive Plan have been reviewed and those applicable have added to Appendix F4.2. Measures include the use of context-sensitive design, use of public art, and public involvement.
4.3 Economics		
CC4.3a	Will the East Link project lower property values due to a nearby station or light rail corridor that generates noise, vibration, and visual impacts.	Section 4.3, Economics, discusses potential positive and negative economic impacts, including property value impacts, of the proposed project. Studies indicate that residential and commercial property values near light rail transit stations typically increase and are valued higher than similar properties not in the vicinity of transit stations. This impact is likely to occur in all segments of East Link, but the benefits may be most realized in Segment D, where both Bellevue and Redmond have adopted supportive plans for transit-oriented development. Studies have also found that property value impacts from light-rail transit can be negative, particularly along a light rail route not in the vicinity of a station. These negative impacts to property values are most likely to occur when the light rail project results in noise or visual impacts noticeably greater than what currently exists and are more often associated with elevated, and to a lesser degree, at-grade alternatives. Sections 4.5, Visual and Aesthetic Resources, and Section 4.7, Noise and Vibration, suggest that there is relatively little potential for these impacts to be of a sufficient magnitude after mitigation to result in negative property value impacts.

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East Link Draft EIS – Responses to Common Comments

Common Comment No.	Common Theme	Common Response
CC4.3b	Project construction and operation will create too many impacts to businesses.	Project construction requires the acquisition and relocation of a number of businesses. Section 4.3, Economics, provides information on the property acquisition impacts on businesses. Relocation assistance would be provided to businesses as appropriate. It is anticipated that many of the jobs at these businesses would be relocated and not lost. Industrial-related businesses that need to relocate and are located in Segment D, within Bellevue, would be impacted because of the changing land use and zoning in the area that would no longer support industrial-related use. These businesses might need to relocate outside of Bellevue. Refer to Section 4.2, Land Use, for additional information on the changing land use and zoning in Bellevue. The project would displace some off-street parking and reduce the ability to make some left-hand turns in some locations as described in Section 4.3.3. This could result in impacts on adjacent businesses; however, the extent is expected to be minimal and in some situations would be offset by the improved visibility of businesses for transit riders. Operation may also result in positive business impacts related to transit-oriented development in those areas where growth and higher densities are encouraged, including Downtown Bellevue and the Bel-Red corridor. Light rail can act as a catalyst for transit-oriented development. Sections 4.3.3 and Section 4.2.3 provide additional information on the positive benefits for businesses. During construction, business impacts could include noise, vibration, dust, loss of parking, and traffic congestion in the areas of construction activities. Depending on the location of the construction activities and nature of the activities, the impacts on businesses would vary. Business-related impacts are more likely to occur near surface construction activities. Businesses that tend to rely on drive-by traffic to attract customers would experience the greatest impacts. Section 4.3.3 provides information on the economic impacts associated with construction in each project segment. As described in Section 4.3.4, a number of mitigation measures have been identified that would minimize the impacts on businesses during construction, including a 24-hour construction telephone hotline, signage, business cleaning services on a case-by-case basis, promotion and marketing measures to help affected businesses, maintaining access as much as possible, and providing a community ombudsman. In addition, other sections of the Final EIS identify mitigation measures related to noise (Section 4.7), dust (Section 4.6), acquisitions (Section 4.1), and traffic (Chapter 3).
4.4 Social Impacts, Community Facilities, and Neighborhoods		
CC4.4a	The project results in impacts on the neighborhoods in Bellevue.	None of the alternatives would result in significant impacts on neighborhood quality, social interaction, community resources, or safety and security, as identified in Section 4.4, Social Impacts, Community Facilities, and Neighborhoods. The project does not bisect any neighborhoods as it travels along or adjacent to existing transportation corridors. While some residences would have visual impacts resulting from vegetation removal or the presence of the light rail structures, and/or changes in access, especially those alternatives which are at-grade, these impacts would only affect residences adjacent to the project elements and not affect the overall neighborhood quality or social interaction. The project would require property acquisitions on the border of some neighborhoods, but these acquisitions would not affect the overall neighborhood cohesiveness. After mitigation, impacts on the neighborhoods are expected to be minimal. Refer to Section 4.4 for complete information on what impact the project would have on the neighborhoods. During construction, neighborhoods could experience impacts related to noise, dust, and traffic congestion. Depending on the location of construction activities, impacts on the neighborhoods would vary, as would the amount of time. Measures would be implemented to address the impacts and are identified and referenced in Section 4.4. Refer to Section 2.4 in Chapter 2, Alternatives Considered, for information on construction approach for the alternatives.
CC4.4b	Alternative B7 would be located very close to residents, and the proximity of the proposed light rail to these residences is closer than that identified in the Draft EIS due to the recent I-405 project, which will increase noise impacts.	Alternative B7 would be located in an exclusive right-of-way in portions of the former BNSF Railway corridor. The Final EIS analysis reflects changes to the former BNSF right-of-way and adjustments made during the construction of the I-405 widening project. The design change is a result of a new sound wall constructed as part of the WSDOT I-405 project. The existing sound wall would be extended to the north and south to mitigate for noise impacts associated with the East Link Project.

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East Link Draft EIS – Responses to Common Comments

Common Comment No.	Common Theme	Common Response
CC4.4c	Alternatives B2A, B2E, and B3 will impact the Bellevue Club.	After construction has been completed, the function of the Bellevue Club would not be compromised from these alternatives, as discussed in Section 4.4, Social Impacts, Community Facilities, and Neighborhoods. The analysis in Sections 4.5, Visual and Aesthetic Resources, and 4.7, Noise and Vibration, respectively, indicate that the 112th Avenue corridor's visual quality would not be adversely lowered and noise and vibration impacts could be successfully mitigated. The elevated alternatives would prevent automobile conflicts with the train movements in and around the club vicinity and would also minimize the amount of right-of-way required to operate the project. Access to the club would be maintained, and all activities at the club are expected to continue during construction, although there may be some short-term inconveniences. During construction there would be temporary impacts related to noise, dust, and traffic congestion, as described in Section 4.4. For additional information on the construction approach, refer to Section 2.4 in Chapter 2, Alternatives Considered. Construction of Alternative B3 would require the loss of some parking stalls in the back of the parking lot for the elevated structure support piers. Sound Transit would provide fair and just compensation for any use of property.
4.5 Visual and Aesthetic Resources		
CC4.5a	The elevated structures will cause greater visual impacts.	Sections 4.5, Visual and Aesthetic Resources, identifies elevated structures as some of the most visible project components. Elevated light rail structures associated with some of the alternatives would be seen to varying degrees and existing views would change from some nearby residences. To minimize visual impacts, elevated structures are used only where necessary for grade-separation and are designed with the lowest height practical, or as allowed by required vertical clearances. The development of the project includes aesthetic treatments that are outlined in Section 4.5. Specific potential mitigation measures for visual impacts are outlined in Section 4.5.4.
CC4.5b	More detail for landscaping mitigation such as planting size is needed.	Potential mitigation measures for visual impacts are discussed in Section 4.5.4 of Section 4.5, Visual and Aesthetic Resources. In addition, Section 4.5.3 lists impact minimization efforts (such as planting appropriate vegetation within and adjoining the project right-of-way to mitigate for existing street trees and other visually important vegetation removed for the project and/or to provide screening for sensitive visual environments and/or sensitive viewers) that would be part of the project. The specific details of replacement landscaping will be developed during final design and permitting process.
CC4.5c	The visual quality analysis of existing conditions and potential impacts analyses are not consistent with my evaluation of the existing conditions and project impacts, and additional detail is needed.	The methodology as described in Appendix F4.5, Visual Consistency and Key Observation Point Analyses, is used in varying degrees throughout the transportation profession in order to assess project impacts. While there are many interpretations of how to define visual quality, this process tries to offer objective criteria that can be applied universally. This process, based on the Federal Highway Administration (FHWA) Visual Impact Assessment for Highway Projects, has been employed for the past 30 years. Consistent with the FHWA manual, visual quality was categorized for portions of segments that exemplify common landscape categories and not on a property-by-property basis. The methodology evaluated how the project would change existing conditions in terms of vividness, intactness, and unity. Please see Appendix 4.5 for more detail. The methodology used is appropriate for a project of this scope and for identifying differences in visual impacts between a large number of alternatives. Each component of the visual assessment (vividness, intactness, and unity) was assessed as high, medium, or low and then averaged for the overall visual quality rating.

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East Link Draft EIS – Responses to Common Comments

Common Comment No.	Common Theme	Common Response
4.7 Noise and Vibration		
CC4.7a	What are the noise impacts during construction and operation of East Link light rail?	The noise impacts of the project are described in Section 4.7, Noise and Vibration, and Appendix H2, Noise and Vibration Technical Report. Sound Transit has calibrated noise impacts with actual noise as measured from the Central Link light rail, train operation noise measurements, identification of track crossovers, and at-grade crossings where bells would ring. The methodology for impact analysis is from the Transit Noise and Vibration Impact Assessment Manual (Federal Transit Administration [FTA], revised May 2006). These criteria are used for all federally funded high-capacity transit projects. Sound Transit has many options of providing mitigation, and all noise impacts can be mitigated to within the FTA noise criteria during the operations of the light rail system. The Final EIS noise and analysis includes the most current measured data. Construction noise would be required to meet the noise regulations of local jurisdictions. As described in Section 4.7, Sound Transit would, as practical, limit construction activities that produce the highest noise levels to daytime hours, or when disturbance to sensitive receptors would be minimized. This section also includes a list of potential noise control measures that would be used either individually or in combination to meet the noise limits. If any nighttime construction was planned, Sound Transit would be required to obtain a noise variance from the City. As stated in Section 2.5 of Chapter 2, Project Alternatives, Sound Transit is committed to satisfying all applicable environmental regulations and to responsibly and reasonably mitigate significant adverse environmental project impacts consistent with Sound Transit policies and applicable regulations. Mitigation measures will be refined through final design and permitting.
CC4.7b	The SDEIS states that "even with the recommended noise mitigation measures, there is potential for residual exterior noise impacts"… How will these exterior noise impacts be mitigated?	As described in Section 4.7.4 of the Final EIS, Sound Transit would provide mitigation for operational noise impacts above the Federal Transit Administration (FTA) criteria consistent with the agency's Noise Mitigation Policy (ST Board Motion 2004-08). This policy establishes a preference for source control (e.g., special trackwork; rail lubricators) or path barrier (such as sound walls between the guideway and the receiver property) methods to mitigate light rail noise. When these methods are infeasible or not effective at reducing noise levels below FTA impact criteria, then residential sound insulation would be evaluated and implemented at impacted properties where the existing building does not already achieve a sufficient exterior to interior reduction of noise levels. In these cases, some exterior uses might experience noise levels above the FTA impact criteria. Sound Transit does not consider these to be a significant adverse impact warranting further mitigation for the following reasons: 1. Consistent with FTA methods and criteria, residential properties are considered "noise-sensitive" primarily because people sleep there and "nighttime sensitivity to noise is assumed to be of utmost importance" (FTA, 2006). Accordingly, FTA methods artificially increase measured existing noise and predicted project noise levels by 10 dBA (a doubling of the noise level) between 10:00 p.m. and 7:00 a.m. While noise measurements and impacts are predicted for outside noise levels at residential properties, FTA methods clearly emphasize noise sensitivity for residential properties at night because project noise could affect people's ability to sleep. 2. During the day and peak traffic periods, light rail noise levels are very similar to (in some cases less than) common noise levels in an urban setting like Downtown Bellevue or along transportation corridors (like I-90, Bellevue Way, 112th Avenue, I-405) where the predominant noise is from existing traffic (buses, trucks, and heavy traffic volumes). During these times of the day, when outdoor uses are most frequent, noise from the light rail would typically be less noticeable because of the higher ambient noise levels from traffic and other urban sources.
4.8 Ecosystem Resources		
CC4.8a	Does Sound Transit have a policy about tree protection?	Section 4.8, Ecosystem Resources, describes impacts on natural resources, including high-value habitats with trees such as riparian forest, urban mostly vegetated forest (coniferous forest, deciduous forest, mixed coniferous/deciduous forest), and urban mostly vegetated areas. High-value habitats regulated by local agencies that would be affected by the project would be mitigated with habitat replacement or enhancement. While Sound Transit would protect mature/established trees to the extent practical, trees and vegetation would need to be cleared for the project to be built and trees might interfere with the overhead catenary power system. Therefore, a clearance zone of 20 feet from the outside tracks is maintained adjacent to the light rail system. Mitigation measures would include restoration of the disturbed area with the appropriate landscaping.

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Common Comment No.	Common Theme	Common Response
CC4.8b	Segment B alternatives and the South Bellevue Station impact the Mercer Slough wetlands.	All Segment B alternatives would have varying degrees of operational and construction impacts on the Mercer Slough wetlands and/or wetland buffers, as discussed in Section 4.8, Ecosystem Resources. While *Preferred Alternative B2M* would affect the greatest amount of wetland buffers, Alternative B7 would result in the greatest loss of wetland and high-value habitat acreage and the least loss of wetland buffer acreage for construction and operation. The other Segment B alternatives would result in a smaller loss of wetland and high-value habitat acreage compared to both *B2M* and B7 and a smaller loss of wetland buffer acreage during construction and operation compared to *B2M*. Section 4.8 describes potential mitigation measures for these impacts.
4.11 Geology and Soils		
CC4.11a	The soils in Mercer Slough are not suitable for construction of the light rail station and parking garage structure.	Since the Draft EIS and SDEIS were issued, Sound Transit has conducted approximately 10 explorations involving drilling, sampling, and testing of subsurface soils at the South Bellevue Park-and-Ride Lot. Results of these explorations revealed that overall conditions within the park-and-ride comprise competent sands and gravel, which are suitable for construction. These explorations identified a limited area along the northeastern side of the park-and -ride that includes a localized pocket of up to 25 feet of softer soil deposits within the footprint of the proposed parking garage. These softer deposits include peat and clays, which in general would not be suitable for construction of the parking garage. Therefore, methods have been identified to address these conditions. The proposed approach involves of the use of drilled shaft foundations to support the garage and possibly the use of ground improvement in localized areas elsewhere. The areas of poor soils are relatively limited, and therefore, the approach being suggested is feasible.
CC4.11b	Alternative E1 will impact the steep slopes along the west side of West Lake Sammamish Parkway.	Geologic risks and impacts of erosion and slope failure are discussed in Section 4.11, Geology and Soils, which identifies the steep slopes along the west side of West Lake Sammamish Parkway. The EIS lists best management practices (BMPs) to help minimize erosion hazards including: • Maintaining vegetative growth and providing adequate surface water runoff systems • Constructing silt fences downslope of all exposed soil and using plastic covers over exposed earth • Using temporary erosion control blankets and mulching to minimize erosion prior to vegetation establishment • Limiting amounts of exposed earth during construction in wet winter months During final design, detailed slope stability evaluations would be conducted, and where appropriate, methods of stabilization developed. Methods that could help minimize landslide hazards include, but are not limited to, the following: • Use of retaining structures that are designed for the loads from moving soils • Use of mechanical slope reinforcement such as ground anchors and micro-pile system • Construction specifications and quality assurance programs that prohibit over-steepened slopes • Groundwater and surface water control In addition, a detailed study during final design would confirm the degree of geologic risk such as might occur from erosion and slope failure. At sites where geologic conditions are not suitable, appropriate engineering design studies, construction measures, and BMPs would be used to avoid and minimize potential impacts.

TABLE 7-1 CONTINUED
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Common Comment No.	Common Theme	Common Response
4.14 Public Services		
CC4.14a	Light rail will bring crime into the neighborhood.	As described in Section 4.14, Public Services, incidences of crime are most likely to occur at the stations and park-and-rides; however, crime is not expected to increase as a result of operation of the stations. Several studies have concluded that crime around stations mirrors crime rates in the surrounding neighborhoods. Most areas in the project corridor have low crime rates (see Section 4.14 for information on crime rates). Sound Transit would implement a number of measures to deter crime in the station areas. Measures to minimize crime would include the use of equipment (e.g., closed-circuit TV [CCTV], sealed fare boxes, and automatically sealed exits), the use of anti-crime programs such as anti-graffiti programs, and the use of security personnel. 2010 crime statistics show that the crime rate per number of riders at transit facilities and on light rail and commuter rail trains is substantially lower compared to overall per capita crime rates in Seattle, Tukwila, and SeaTac.
4.16 Historic and Archaeological Resources		
CC4.16a	The Bellevue Way SE alternatives impact the Winters House, a historic resource.	FTA, in consultation with SHPO, has made a determination of adverse effect for the project under Section 106. This determination results from the project's potential impact on the Winters House. Where potential long-term or permanent operation impacts could occur to the Winters House from *Preferred Alternative B2M*, project design mitigates and resolves the potential impact. Operation of *Preferred Alternative B2M* within proximity to the Winters House would include standard vibration mitigation measures and floating slab, if necessary, to eliminate groundborne noise impacts. None of the project alternatives would result in visual impacts that could diminish the integrity of the characteristics that qualify the Winters House for National Register of Historic Places inclusion or eligibility. In addition to incorporating conditions into the project to avoid potential impacts, *Preferred Alternative B2M* would also provide a benefit to the historic resource by restoring the front yard consistent with the historic landscape and add interpretive signage. The construction impacts of the nonpreferred Segment B alternatives would not remove or diminish the character-defining features of the property. *Preferred Alternative B2M* has the potential to impact the Winters House during construction. Implementation of mitigation measures would resolve these potential impacts. A Memorandum of Agreement to refine the mitigation measures for the Winters House is included in Appendix I.
CC4.16b	Segment C alternatives impact the potential Surrey Downs Historic District.	FTA, in consultation with SHPO, has made a determination of adverse effect for the project under Section 106. This determination results from the project's potential impact on the potential Surrey Downs Historic District. None of the Segment C alternatives were found to have impacts on the potential Surrey Downs historic district during project operations. However, *Preferred Alternative C11A* and Alternatives C4A, C2T, and C3T would have potential construction impacts to the potential Surrey Downs historic district. These potential impacts would be resolved with construction minimization measures. Construction of these alternatives would introduce visual, audible, and atmospheric elements that would temporarily change the setting of the eligible historic district. However, the alternatives would not alter or remove contributing resources to the district and it would retain its architectural cohesiveness. Please refer to Section 4.16 of the Final EIS for a discussion of potential impacts and mitigation for the potential historic district. A Memorandum of Agreement to refine the mitigation measures for this resource is included in Appendix I.
4.17 Parks and Open Space		
CC4.17a	Segment B alternatives impact Mercer Slough Nature Park.	All Segment B alternatives would affect the Mercer Slough Nature Park to varying degrees. Consistent among all Segment B alternatives, however, is that they run on the edge of the park along existing highways and major arterials to minimize impacts. Alternative B1 would have the least permanent impact, and Alternative B2E would have the least construction impact. Park impacts are discussed in Section 4.17, Parkland and Open Space. Impacts on Mercer Slough Nature Park would be mitigated for all Segment B alternatives through acquisition of replacement land for permanent impacts, financial compensation, and restoration and potential enhancement of disturbed park area.

TABLE 7-1 CONTINUED
East Link Draft EIS – Responses to Common Comments

Common Comment No.	Common Theme	Common Response
CC4.17b	Proposed alternatives in Segment C impact Surrey Downs Park and could delay implementation of the Surrey Downs Park Master Plan.	As described in Section 4.17, Parkland and Open Space, the permanent impact area to the park would range from 0 acre to 0.5 acre, depending on the project alternative and the connection to Segment B. Permanent impacts on the park would be limited to the eastern edge along 112th Avenue SE for *Preferred Alternative C11A* and Alternatives C2T, C3T, C4A, and C7E. *Preferred Alternative C9T* includes realignment of SE 4th in the northeast section of the park. All park impacts would be mitigated. Alternatives C2T and C3T connecting to Alternative B2A would require closure of the northern section of the park currently occupied by the King County District Court, thus resulting in temporary impacts. The area currently used as park would remain open during this period. Other project alternatives, including *Preferred Alternatives C11A* and *C9T*, would not close the park during construction, and only a small section along 112th Avenue SE would be directly affected. The remainder of the park would continue to function. *Preferred Alternative B2M* connecting to *Preferred Alternative C9T* or Alternatives B2A or B2E would provide a station south of the park along 112th Avenue SE, thereby improving access to the park. Sound Transit would restore the park to pre-project conditions after construction. Most of the recreational areas of the park would be available for use during construction. If construction of the park Master Plan has not begun prior to East Link construction, Sound Transit would restore the park to pre-project conditions or make it consistent with the Master Plan, as appropriate. If the Master Plan has not been implemented prior to East Link construction, the project would facilitate park development by relocating the King County District Court. Unless park development and the East Link project construction timing coincide, the East Link project would not delay park development.
CC4.17c	Proposed alternatives destroy existing parks.	None of the proposed project alternatives would destroy existing parks. As discussed in Section 4.17, Parkland and Open Space, all Segment B alternatives, most Segment C alternatives, and all Segment E alternatives would have impacts on existing parks. However, all of these impacts would be mitigated through replacement of permanently affected parkland, financial compensation financial compensation to the jurisdiction for use of parkland during construction, and restoration of disturbed area after construction, as described in Section 4.17. In addition, some of the proposed alternatives would facilitate development of future planned parks in the City of Bellevue's Parks and Open Space System Plan (open space buffer area on the south side of Main Street, development of Pocket Park, and Surrey Downs Park), or result in increased park area in McCormick Park after construction.
CC4.17d	Various alternatives impact McCormick Park, an important buffer area between the neighborhood and downtown Bellevue, during construction and operation.	As stated in Section 4.17, Parkland and Open Space, McCormick Park is a neighborhood park that provides a buffer between the single-family residences to the north and high-density residential and commercial uses to the south. Alternatives C3T, C4A, and C8E would temporarily close portions of the park during construction for 4 to 5 years, but pedestrians would be directed to the open portions of the park during construction. While some project alternatives would temporarily change the visual quality and temporarily reduce the park's function as a buffer from adjacent uses, the park's function as a buffer would ultimately be restored. In addition, the project would result in an overall increase in park acreage after construction with the use of the construction staging area for park expansion. With these measures, light rail operating adjacent to the park would not reduce the viability of the area for park uses, especially considering its primary function as a buffer, because the existing park is currently adjacent to NE 12th Street, a 4-lane principal arterial with average daily traffic over 20,000 vehicles.
6. Alternatives Evaluation		
CC6.a	The project generates a small number of new transit riders, which would result in a higher cost per rider if only new riders were considered.	The East Link Project would attract new transit riders and benefit existing transit riders from the improved frequency, reliability, and travel time savings created by the project. In addition, as stated in Chapter 3, Transportation Environment and Consequences, by 2030 with the East Link Project, close to 10,000 more people would use transit than drive if bus service only is provided to the Eastside communities. A cost-effectiveness measure was chosen that could be used to compare route alternatives at the conceptual engineering stage of project development. Cost per rider was chosen as an effective way to compare route alternatives because it responds to both cost and project ridership. The benefits and use of the East Link project would extend over many decades, and annualizing the cost and ridership of the project reflects the project's long-term usefulness. Cost-effectiveness is discussed further in Chapter 6 of the Final EIS.

TABLE 7-1 CONTINUED
East Link Draft EIS – Responses to Common Comments

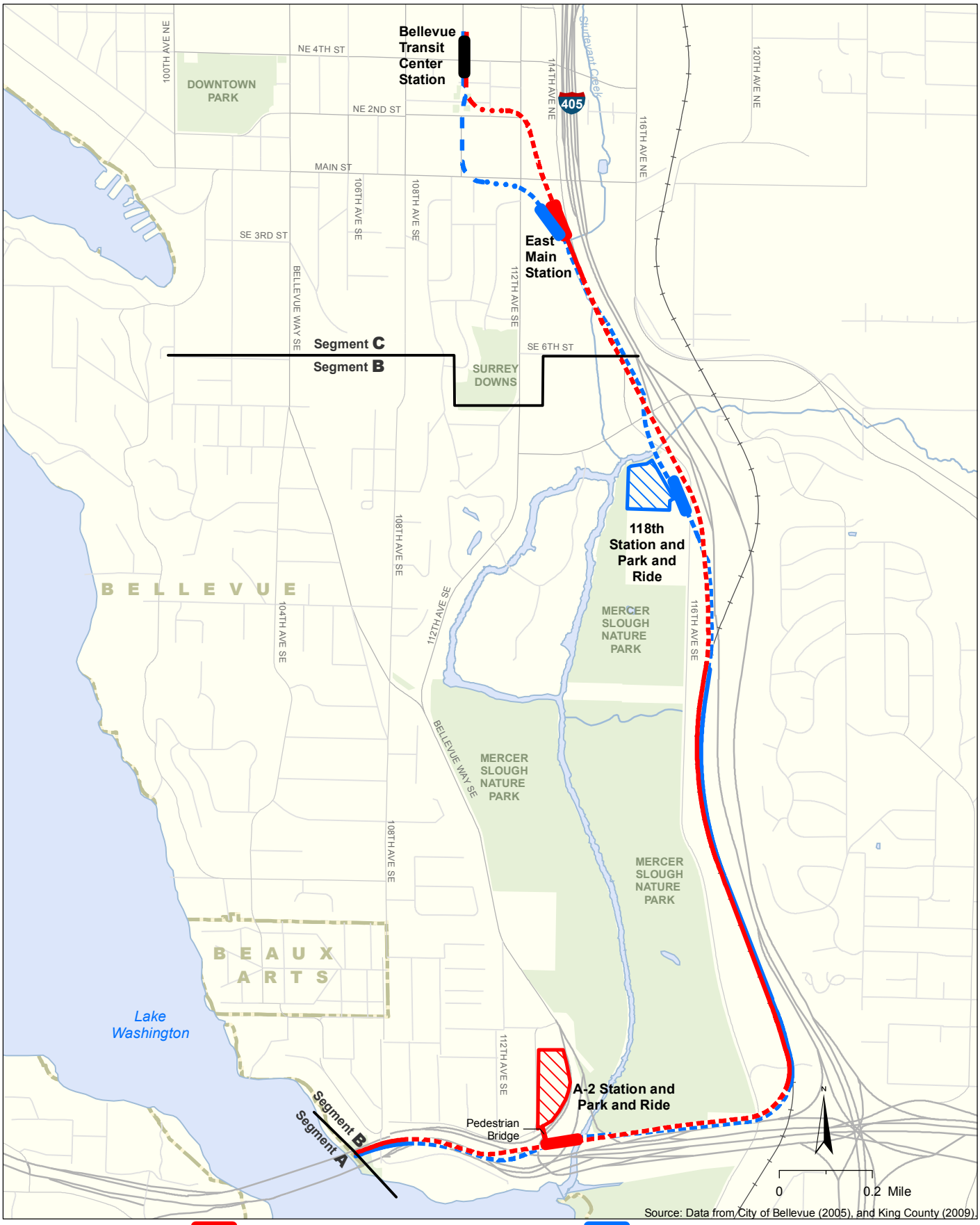
Common Comment No.	Common Theme	Common Response
General		
CCG1	Need more construction impact detail	Sound Transit has included an overview of potential construction impacts for each light rail profile type: At-grade, elevated, tunnel, and retained cut, in Section 2.4 of Chapter 2, Alternatives Considered. Construction impacts for each element of the environment and alternative are discussed in the corresponding sections of the EIS. As stated in Chapter 2, a detailed construction plan will be developed during final design. Sound Transit is committed to satisfying all applicable federal, state, and local environmental regulations and to responsibly and reasonably mitigate significant adverse environmental project impacts consistent with Sound Transit policies and applicable regulations. The Record of Decision for East Link issued after the Final EIS would include a list of committed mitigation measures for the project to be built. In addition, more detailed mitigation measures that address construction impacts would be refined through final design and the permitting process with the local jurisdiction. See also Response to Common Comment CCG3.
CCG2	Delay release of the Final EIS until Bellevue publishes their study of Alternative B7R	Bellevue's B7R study, which studies modifications to Alternative B7 and *Preferred Alternative C9T*, is briefly described in Chapter 2 of the Final EIS, and a summary of the study and comparison to the impacts of East Link Alternatives B7 and *C9T* is provided below in Section 7.6 of this chapter. Appendix K includes the full study.
CCG3	The EIS does not provide enough detail on the project design, impacts thereof, or especially mitigation of impacts.	The State Environmental Policy Act (SEPA) stipulates that the purpose of an EIS is to provide the public and decision makers with information about a proposal "at the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified" (WAC 197-11-055(2)). Further, SEPA acknowledges that "the EIS need not analyze mitigation measures in detail unless they involve substantial changes to the proposal causing significant adverse impacts…"(WAC 197-11-440(6)(c)(iv). As stated in several places in the Final EIS, when a decision has been made to select the project to be built, the project would undergo additional engineering and design; mitigation measures would be refined during the final design, and the permitting process would be coordinated with local permitting authorities. The National Environmental Policy Act (NEPA) also states that "Agencies shall integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts" and that the Federal agency "commences its NEPA process at that earliest possible time" (40 CFR 1501.2). It is standard practice to complete the NEPA process at approximately 10 to 15 percent level of design.

7.6 Review of City of Bellevue B7R Study

The City of Bellevue developed and studied modified designs for the BNSF Alternative (B7) connecting to the *Preferred 110th NE Tunnel Alternative (C9T*), referred to as B7-Revised (B7R). During the comment period for the SDEIS, the Bellevue City Council and several other members of the public requested that Sound Transit wait for their analysis of B7R to be developed prior to decision making by the Sound Transit Board (see comment letter ELS543 and Common Comment number CCG2). In response to the City's request, Sound Transit worked cooperatively with city staff and their design consultant throughout the winter and spring of 2011 as the city worked on the B7R design and environmental screening analysis.

This section of the Final EIS provides a comparison of impacts for the City of Bellevue's proposed B7R option with the BNSF Alternative (B7) connecting to *Preferred 110th NE Tunnel Alternative (C9T)* (referred to in this section as B7/C9T). Generally, the B7R follows a similar alignment as the B7/C9T (see Exhibit 7-1). Key differences between the B7R and the B7/C9T include the following:

- B7R has a light rail station (A2) located adjacent to and north of I-90 over the I-90/Bellevue Way SE interchange, with a pedestrian walkway to a new parking garage and bus transfer center on the west side of Bellevue Way SE (see Exhibit 7-2). Roadway access to the parking garage would be from Bellevue Way SE and 113th Avenue SE and require a new overpass over Bellevue Way SE.
- B7R does not have a 118th Station and does not serve the existing South Bellevue Park-and-Ride, which is assumed to be closed.



B7R to C9T

- At-Grade Route
- Elevated Route
- Retained-Cut or Retained-Fill Route
- Tunnel Route

- B7R to C9T Stations
- B7R Proposed Parking Area

B7 to C9T

- At-Grade Route
- Elevated Route
- Retained-Cut or Retained-Fill Route
- Tunnel Route

- B7 to C9T Stations
- B7 Proposed Parking Area
- Station Common to Both Alternatives

Exhibit 7-1
B7/B7R Segments B and C
East Link Project

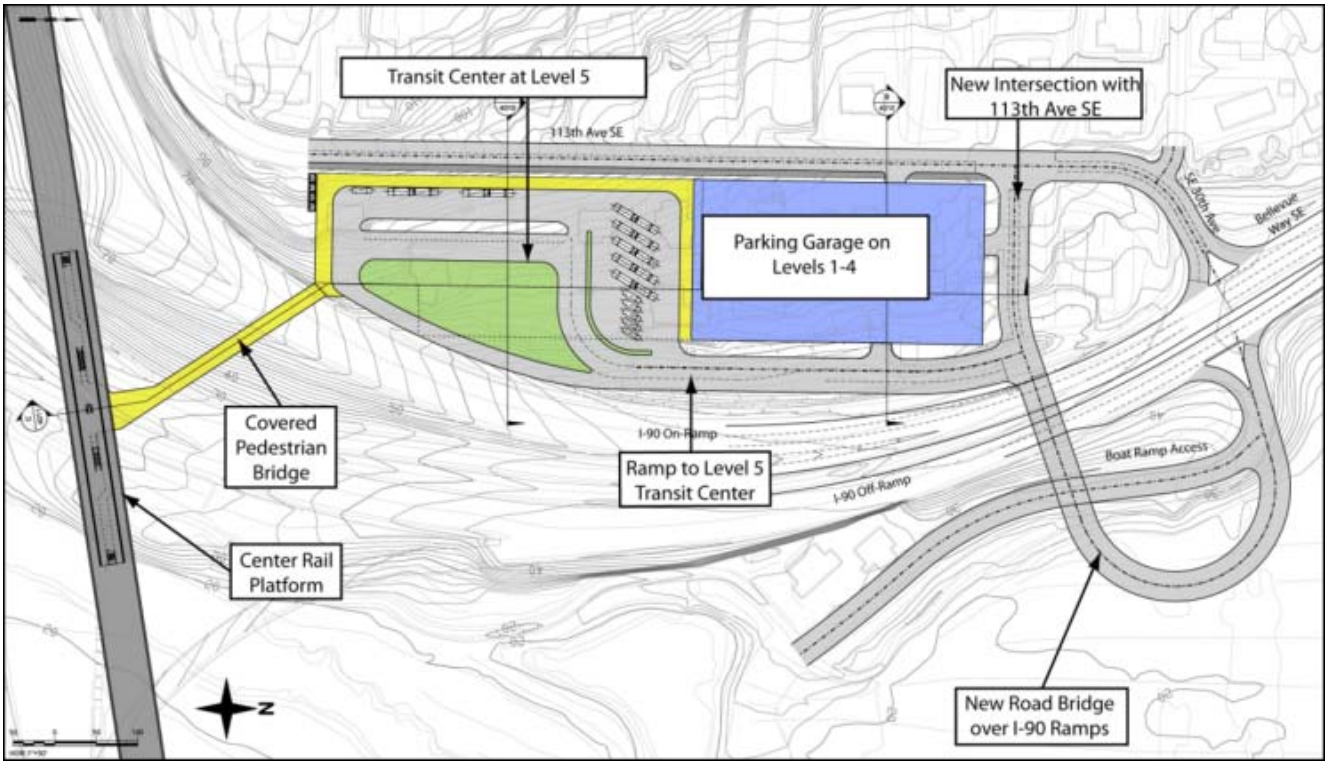


EXHIBIT 7-2
A2 Station and Parking

- B7R includes two options for accommodating the former BNSF Railway corridor's "railbanked" status. One option assumes joint, or shared use of tracks by light rail and freight or commuter rail trains, which is inconsistent with Sound Transit's design criteria. The second option accommodates space for future freight rail operations with an interim trail use, more consistent with Sound Transit's current design in the corridor.
- B7R is designed to connect to a revised Alternative C9T which would cross under Main Street, begin the tunnel portal north of Main Street and turn west at NE 2nd Street instead of Main Street, where *Preferred Alternative C9T* enters a tunnel portal.
- B7R would be on a retained fill 4 to 6 feet high on the east side of Sturtevant Creek near the Hilton Hotel, requiring relocation of the creek and reducing the stream buffer width by approximately one-third. B7R would cross the creek with a low-profile bridge.

Costs were not developed with the same assumptions as Sound Transit's cost analysis and therefore are not directly comparable. However the City of Bellevue's estimates declare a difference of approximately $10 to $14 million more than the East Link B7 and *C9T* alternative combination; approximately $150 million more than the *Preferred Alternative B2M* and *C9T* combination; and approximately $400 million more than the *Preferred Alternative B2M* and *C11A* combination.

The information in the following comparison originates from the City's Interim Analysis Report (found in Appendix K of this Final EIS) and the supporting technical memorandum as developed for the City of Bellevue and found on the City of Bellevue's Web site at http://www.ci.bellevue.wa.us/b7-revised-light-rail-route.htm. Where effects differed between the Interim Analysis Report and the technical memorandum, this comparison defers to the technical memorandum.

Not all elements of the environment were directly analyzed by the City and methodologies applied by the City's study for some elements of the environment are not entirely consistent with the methodologies used for the Final EIS analysis. The environmental study prepared by the City is not intended to be an EIS level analysis to compare against the B7 and C9T alternatives in the Final EIS. In general, many of the B7R analyses depended on information available in the Draft EIS or Supplemental Draft EIS and in other cases, impacts were discussed qualitatively. For these reasons, the data are not equivalent to the data found elsewhere in this Final EIS.

This section also describes differences in analysis methodologies where applicable. The following environmental categories analyzed in this Final EIS were not evaluated in the B7R study and they are not discussed here: Land Use, Air Quality and Greenhouse Gases, Energy Impacts, Geology and Soils, Hazardous Materials, Electromagnetic Fields, Public Services, Utilities, Historic and Archaeological Resources, and Cumulative Impact Analysis. For categories that were analyzed quantitatively, Table 7-2 presents the comparison between B7R and B7/C9T. The City's design modifications and study thereof terminate at the Bellevue Transit Center Station in the middle of Segment C. In order to offer a relative comparison, the data for impacts associated with the area between the Bellevue Transit Center and the Segment D boundary are assumed to be the same as the *Preferred Alternative C9T*.

7.6.1 Transportation

Technical memoranda were completed for B7R light rail ridership and traffic impacts near South Bellevue Way and I-90 only. The transit ridership forecasts prepared for B7R are consistent with the methods used to prepare ridership forecasts for alternatives described in the EIS. The B7R study utilized Sound Transit's ridership model using the same transit network model coding, assumptions, and inputs as done for the Final EIS. Results indicate that the A2 Station in Segment B would generate greater ridership compared to the 118th Station. B7R ridership would slightly decrease at other stations in Segments A and C, and ridership would remain constant in Segments D and E. Projectwide daily ridership would increase to 50,500 with B7R, compared to 49,000 with B7/C9T. While the traffic analysis was generally conducted using reasonable assumptions, and in accordance with professional practice, it does not provide a point of direct comparison between the B7R and EIS alternatives. The methods and assumptions used for Sound Transit's East Link Final EIS travel demand modeling and traffic operations analysis were developed based on input from state and local agency staff and the applicable long-range plans. While a partial discussion of the transportation methods and assumptions is included in the B7R study, the detailed information necessary to determine if the approach was consistent with this East Link Final EIS is not fully evident.

TABLE 7-2
Summary Comparison of B7R and B7/C9T

Resource		City of Bellevue's B7R Option			B7/C9T Alternatives
		From Segment A to Bellevue Transit Center Station[a]	C9T from Bellevue Transit Center Station to Segment D[b]	B7R Total	
Ridership[c]	Segments B and C	12,500		**12,500**	**10,500**
	Projectwide	50,500		**50,500**	**49,000**
Noise Impacts[e]		239	100	**339**	**316**
Acquisitions	Full	25	3	**28**	**20**
	Partial	10	13	**23**	**30**
Residential displacements		12	0	**12**	**0**
Business displacements (no. of employees)		9 (215)	10 (100)	**19 (315)**	**24 (370)**
Wetland (acres permanent)		2.1	0	**2.1**	**1.9**
Wetland buffers (acres permanent)		1.0	0	**1.0**	**0.5**
Parks (acres permanent and temporary)[e]		2.3[d]	0.4	**2.7**[d]	**3.0**

[a] Source: City of Bellevue B7R Interim Analysis Report (2011).
[b] Source: Applying East Link Project impacts for C9T north of Bellevue Transit Center in order to compare against impacts from East Link Project B7 and C9T combination.
[c] Ridership is calculated for segment combinations and is not available for areas less than the segment level.
[d] Includes 2.3 acres included in B7R analysis and 0.4 acre of impact to NE 2nd Pocket Park from Bellevue Transit Center Station entrance. Impacts to pocket park might be greater but are not identified in B7R analysis.
[e] Where effects differed between the Interim Analysis Report and the technical memorandum, this comparison defers to the technical memorandum.

These methods and assumptions could have substantial influence on any conclusions from the transportation modeling and operational analysis.

An example of how different approaches can influence the analysis is evident in the preparation of the travel demand forecasts. For this Final EIS, forecasts were primarily developed using the Puget Sound Regional Council's regional travel demand model, while forecasts for the City of Bellevue's B7R study relied on the Bellevue-Kirkland-Redmond (BKR) model. While these two models have some similar characteristics, they are not expected to produce similar forecasts. A comparison of the future traffic volumes used in the two analyses suggests up to a 20 percent difference in roadway traffic volumes along the Bellevue Way SE and 112th Avenue SE portion of the study area.

According to the B7R study, the intersection of SE 30th St and Bellevue Way SE would not meet WSDOT intersection LOS standards and would operate worse with B7R than under the No-Build condition, therefore requiring mitigation. With mitigation, B7R would result in improved traffic operations along Bellevue Way SE compared with B7, which does not affect or change this roadway. The other two intersections studied under the B7R alternative would meet the City of Bellevue's LOS standards. At the Bellevue Way SE/South Bellevue Park-and-Ride/112th Avenue SE intersection, this intersection would operate acceptably in either the B7 or B7R conditions, but it would have quite different characteristics because with Alternative B7 the South Bellevue Park-and-Ride would remain open at its current location, while under B7R the park-and-ride is relocated to the A2 Station site. Intersections where impacts occur with Alternatives B7 and C9T, including near the East Main and Bellevue Transit Center Stations, were not studied for B7R and therefore it is unknown how they would operate under the B7R alternative.

7.6.2 Environmental Consequences

7.6.2.1 Acquisitions, Displacements and Relocations

The proposed B7R would have 12 residential relocations in order to build the garage, transit center and access for the A2 Station (Exhibit 7-2). These would not occur with B7/C9T. B7R would have one more property acquisition (51) than B7/C9T (50), with more full acquisitions (28) than B7/C9T (20 total). The additional full acquisitions are primarily associated with the garage and transit center serving the A2 Station. The site identified by the Low Income Housing Institute (LIHI) for a low-income housing complex on NE 2nd Street would be acquired for the tunnel construction. Alternative B7/C9T would displace five more businesses than B7R due to acquisitions for the 118th Station.

7.6.2.2 Economics

B7/C9T would displace more employees (370) than B7R (315). It is unknown how the City of Bellevue study calculated employee displacements, so it is unknown if this methodology is consistent with that used by Sound Transit.

7.6.2.3 Social Impacts, Community Facilities, and Neighborhoods

Although not discussed in great detail, nor using the Final EIS methodology, the Early Environmental Technical Memorandum (published in May 2011) claims that the B7R garage, transit center and access for the A2 Station would substantially change the character of the Enatai neighborhood because it would add intense activity, change neighborhood views and alter traffic patterns. B7/C9T would not result in these impacts. The study also states that extensive mitigation would be necessary to reduce impacts on the Enatai neighborhood from the B7R, although these mitigation measures are not outlined. Potential acquisition of the LIHI housing complex could result in an environmental justice impact. In other areas, the impacts of B7R would be similar to B7/C9T.

7.6.2.4 Visual and Aesthetic Resources

While the B7R study does not evaluate visual impacts using the Final EIS methodology, or at the same level of detail as this EIS, the study does identify a potentially significant visual impact caused by the parking garage for the A2 Station. The upper level of the parking garage would be visible from the neighborhood and lit at night, potentially resulting in some light spillover for residences west of 113th Avenue SE. The east side of the garage would be up to 40 feet above Bellevue Way SE and, along with the access ramp over Bellevue Way SE, would change views from Bellevue Way SE and areas east, including Mercer Slough Nature Park. Based on the B7R analysis, it appears that B7R would have adverse visual effects. B7/C9T would not result in visual impacts.

7.6.2.5 Noise and Vibration

For the portion up to the Bellevue Transit Center Station the City of Bellevue identified more moderate impacts (193) for B7R as compared to B7/C9T (148), but less severe impacts (46) than compared to B7/C9T (68). Overall, including the entire route to Segment D, B7R would have slightly more total impacts (339) than B7/C9T (316). However, B7R identifies some impacts in locations that are unlikely to occur based on the Final EIS analysis, such as the south side of I-90 and on

112th Avenue SE. While many of the impacts along the proposed B7R route would be similar to B7 /C9T as described in this Final EIS, noise impacts around the garage at the A2 Station would result in additional impacts. The B7R study indicates that the impacts from the station would be from cars and buses, not light rail, although it also states a traffic noise analysis was not completed, so it is unclear whether these impacts are counted or not. An analysis of traffic noise impacts would be needed to more accurately compare these alternatives.

7.6.2.6 Ecosystem Resources

The difference in ecosystem impacts between B7R and B7/C9T cannot be directly compared because the B7R study analysis does not include the same impact measures or the same level of detail as the analysis completed in this Final EIS. The study does state that B7R would impact a total of 2.1 acres of wetlands, compared with 1.9 with B7/C9T, and 1.0 acre of wetland buffer, compared with 0.5 acre with B7/C9T. This increase would be due to the access ramp to the A2 Station parking garage, which would affect 0.3 acre of Mercer Slough Category 1 wetland and 0.2 acre of wetland buffer that would not be impacted by B7/C9T. Construction of the additional support columns needed for the A2 Station would disturb a greater area of soil and vegetation in the Mercer Slough wetland buffer and would have greater potential to disturb the I-90 Seismic Retrofit Wetland Mitigation Site than B7/C9T. A longer construction period and greater ground disturbance for the A2 Station would increase potential for pollutant runoff to enter the slough compared with B7/C9T.

B7R would bridge and realign a portion of Sturtevant Creek near the Hilton Hotel. This reach of the stream has good quality habitat downstream of the existing culvert under I-405. B7R would also result in a reduction of approximately one-third of the stream buffer compared with existing conditions or the B7/C9T. The *Preferred Alternative C9T* connecting from B7 would also affect the stream buffer in this location. However, the guideway for C9T would be elevated, most of the stream buffer would be preserved, and it would not be necessary to realign the creek. The B7R study states that impacts on Sturtevant Creek would be greater than B7, but no discussion of specific impacts on Chinook salmon, sockeye salmon, or cutthroat trout habitat is provided. After this portion of the stream is relocated, B7R would result in a wider stream buffer in this location than B7. It would be more difficult to obtain permits for B7R than for B7/C9T because B7R would require permanent relocation of a portion of Sturtevant Creek with good quality aquatic habitat and construction of a low-profile bridge over the creek. Although the bridge is intended to avoid extending the I-405 culvert, the bridge profile would be less than 10 feet from the stream surface. The evaluation of costs and the ability to mitigate impacts from B7R are uncertain.

7.6.2.7 Water Resources

The B7R study has a qualitative discussion of pollutant-generating impervious surface (PGIS). The study reports that B7R would have a greater increase in PGIS than B7/C9T because the A2 Station parking garage and transit center would result in 4.1 acres of PGIS compared with 2.9 with the 118th Station. The B7R study states that a pollutant loading analysis would be required to determine if impacts on water quality in Mercer Slough would still occur after basic treatment of stormwater. Changes in non-PGIS are estimated in the B7R study to be similar to B7/C9T for the B7R corridor beyond the A2 Station.

7.6.2.8 Parkland and Open Space

The B7R study identifies 2.3 acres of impact on Mercer Slough Nature Park from B7R, compared with 2.6 acres with B7. The B7R study does not discuss impacts on the NE 2nd Street Pocket Parks. The proposed realignment for B7R clearly affects this park and therefore the associated impacts of the *Preferred Alternative C9T* (0.4 acre) are included in Table 7-2 for both B7R and for B7/C9T.