Public and Agency Comment Summary

5.1 Introduction

This chapter provides an overview of the comments Sound Transit and FTA received from agencies, tribes, and the public during the comment period. It also describes briefly the ways that Sound Transit and FTA advertised the Draft EIS release and publicized the public hearings/open houses and other events.

The Draft EIS public hearings/open houses were designed for the public to learn more about the proposed project, and they included several stations where attendees could provide comments. The public hearing portion of the meetings allowed participants to testify before a Sound Transit Board member, project staff, and a court reporter, with an audience of other interested members of the public. Formal comments could also be submitted in writing using forms at the meetings, by email, by mail, or directly to Sound Transit's office. All methods for submitting comments were advertised and are detailed further in Appendix B, *Public Involvement*.

This chapter also provides Sound Transit and FTA responses to the most common comments. All comments are presented in their entirety along with Sound Transit and FTA responses in Appendix I, Comments and Responses.

5.2 Overview of Comments Received

Sound Transit and FTA received approximately 792 sets of comments (i.e., letters, emails, or statements) on the Draft EIS. Comments were received from federal, state, and regional agencies; tribes; businesses; community organizations; and members of the public (Table 5-1). The numbers reflect the total number of comments received, although some parties submitted comments multiple times.

Table 5-1. Estimated Comments Received by Commenter Type

Commenter Type	Number of Comment Letters	
Federal agencies	2	
State agencies	0	
Regional and local agencies	9	
Tribes	1	
Businesses	74	
Community organizations	10	
Individuals	696	
Total	792	

The most common comment received expressed opposition to the SR 520 Alternative. Over 500 comments in opposition to the SR 520 Alternative site were received, mainly related to the displacement of businesses and not-for-profit organizations, impacts on Goff Creek, potential for impacts on the quality of life in the Bridle Trails neighborhood, and the proposed project's inconsistency with the *Bel-Red Subarea Plan*.

Approximately 1,300 people signed a petition opposing the Lynnwood Alternative that highlighted adverse impacts on wetlands, wildlife habitat, and the quality of life for adjacent residential areas and businesses. Approximately 20 commenters opposed the same alternative because it would impair the Edmonds School District's plans to develop the site.

Thirteen commenters opposed the BNSF Alternative and BNSF Modified Alternative because of these sites' proximity to the planned 120th Avenue Station. These comments focused on the proposed project's inconsistency with the *Bel-Red Subarea Plan* and the opportunity costs of developing an OMSF in this area.

Most comments focused on expressing opposition to one of the build alternatives. Many, but not all, identified specific concerns behind their opposition, such as impacts on ecosystems and ecological resources, land use patterns, and communities and neighborhoods, as well as land acquisitions and displacements.

The following sections discuss the comments by build alternative, summarizing the general support for or opposition to each alternative and the commenters' primary environmental concerns.

5.2.1 Preferred Alternative

The BNSF Alternative received the most support from commenters. Supporters highlighted its lower cost and fewer displacements, compared to the Lynnwood Alternative or SR 520 Alternative. Most concerns related to the alternative's compatibility with future land uses being planned and built near the site as envisioned in the *Bel-Red Subarea Plan*. Commenters also expressed concerns regarding potential impacts on future residents or businesses (such as noise and visual effects on neighboring properties).

The City of Bellevue also raised concerns regarding the Draft EIS characterization of impacts on the Eastside Rail Corridor and its potential future development. In addition, the City raised concerns regarding the alternative's impacts on the City-owned rail spur, which it intends to develop into a future trail connection to the Eastside Rail Corridor.

Other comments related to the cumulative impacts of constructing the BNSF Alternative and the East Link project.

5.2.2 BNSF Modified Alternative

Both the City of Bellevue and the Bellevue Fire Department opposed the BNSF Modified Alternative, because it would displace the Bellevue Public Safety Training Center, which provides numerous and

unique training activities to both fire and police personnel. Relocating the facility would be difficult given its unique characteristics.

A number of other comments identified concerns that were generally applicable to both the BNSF Alternative and BNSF Modified Alternative. One individual opposed the BNSF Modified Alternative, stating that it was not consistent with the City of Bellevue's redevelopment vision under the *Bel-Red Subarea Plan* and that siting the OMSF at this location would have a negative impact on future development in the area. Another individual commented that the BNSF Modified Alternative was inferior to the BNSF Alternative because it affected properties along both 116th Avenue and 120th Avenue NE as opposed to affecting just those properties along 120th Avenue NE.

5.2.3 SR 520 Alternative

Most of the comments on the SR 520 Alternative opposed it because of its many business displacements. Many commenters, including both business owners and patrons, questioned the ability of displaced businesses to relocate and whether fair compensation would be provided. A number of commenters opposed the displacement of the MOSAIC Children's Therapy Clinic. As with the BNSF Alternative and BNSF Modified Alternative, some comments objected to the alternative's incompatibility with planned development under the *Bel-Red Subarea Plan*.

Several commenters criticized the Draft EIS analysis of piping Goff Creek. They asserted that salmonids occur within the lower reaches of Goff Creek and so these reaches should be considered salmon habitat, and stated that replacing the open channel with piping would compromise future plans to reopen downstream barriers to salmonid migration. Other environmental concerns were related to construction impacts on nearby residents.

5.2.4 Lynnwood Alternative

Many comments on this alternative expressed concern about its impacts on the Edmonds School District plans for the District Support Services Center, and to the Scriber Creek and Scriber Creek Park ecosystems as well as park users. Some objected to noise, light, visual and community impacts, especially on the adjacent single-family neighborhood. Some noted that the Lynnwood Alternative was the only alternative located close to an established residential neighborhood.

A number of comments opposed the displacement of the Department of Social and Health Services (DSHS) offices. They noted that displacing the DSHS offices, which provide the local community with social services, would be disruptive to the community.

Several comments pointed out that this is the most costly of all build alternatives. Others observed that the Lynnwood Alternative would still require a facility to be built in Bellevue, disrupting both communities as opposed to just one.

5.3 Comments Received from Public Agencies and Tribes

5.3.1 Federal Agencies

Two federal agencies commented letters were received from: the U.S. Department of Interior and U.S. Environmental Protection Agency (EPA). The U.S. Department of Interior informed FTA it had no comments.

EPA rated the build alternatives based on information provided in the Draft EIS. It rated the Lynnwood Alternative an EC-2 (Environmental Concerns, Insufficient Information) based on potential impacts to the Scriber Creek wetlands. The other three alternatives were ranked as LO (Lack of Objections). EPA sated that the comments and concerns previously identified in its letter regarding the *Lynnwood Link Extension Draft EIS* (Sound Transit 2013) also applied to the OMSF.

EPA stated that the BNSF Alternative appeared to be the Environmentally Preferred Alternative. However, with potential design modifications, such as not piping Goff Creek, and ideally removing fish passage barriers, the SR 520 Alternative could also be the Environmentally Preferred Alternative.

5.3.2 State Agencies

No comments were received from state agencies.

5.3.3 Regional and Local Agencies and Jurisdictions

King County holds property interests along the Eastside Rail Corridor, and members of the Metropolitan King County Council voiced a concern that the designs of the Lynnwood Alternative, BNSF Alternative, and BSNF Modified Alternative may not preserve enough space for multiple uses in the Eastside Rail Corridor. The County Council stated that the BNSF Alternative and BNSF Modified Alternative sites would be more appropriate for dense mixed-use development than for the OMSF. It asked that Sound Transit leave the Eastside Rail Corridor unimpeded.

King County Department of Natural Resources and Parks requested that Sound Transit work collaboratively with its trail planning team, and with King County Wastewater Treatment Division, if facilities are to be colocated in the Eastside Rail Corridor.

The Edmonds School District requested that Sound Transit remove the Lynnwood Alternative from consideration. The district noted that it has plans and funding to develop a centralized district support center on its property and that it intends to break ground on the project in 2015. It also provided comments regarding the efficiency of the Lynnwood Alternative site to serve Sound Transit's operational needs, and visual and ecological impacts of the proposed project. It stated that its needs could not be met by separating the transportation function from the warehouse and maintenance components of its planned district support center.

The City of Lynnwood similarly asked Sound Transit to eliminate the Lynnwood Alternative from consideration because it would:

- Have both higher capital and ongoing operating costs than the BNSF Alternative.
- Prevent Sound Transit from meeting its service goals for evening headways.
- Cause substantial impacts on wetlands, parks, and streams that would not occur under the other alternatives.
- Place tracks within 100 feet of a large single-family neighborhood, unlike the other alternatives.
- Affect Lynnwood residents who are culturally diverse and have low to moderate incomes, and displace a large DSHS office complex serving the community, raising economic justice issues.
- Require acquisition of the Edmonds School District administrative and transportation complex. The property is not for sale and the district intends to proceed with its plans.
- Face community opposition similar to that created by some of the Lynnwood Link alternatives.

The City included additional detailed comments on the impact analysis provided in the Draft EIS. It also submitted a letter from the Lynnwood Historical Commission requesting that the Cedar Valley Grange and the Interurban Railway be recognized as historic properties in the Final EIS.

Three entities at the City of Bellevue sent four comment letters: the Bellevue Fire Department, Bellevue City Council, and the Department of Planning and Community Development (two letters).

The Bellevue Fire Department commented only on the BNSF Modified Alternative's displacement of the Bellevue Public Training Center. It believes it would be difficult to find an alternative site in the greater Bellevue region. Relocation to a site in eastern King County or outside of King County could cause significantly higher costs and/or reduced fire protection capabilities.

The Bellevue City Council stated that the BNSF Alternative, BNSF Modified Alternative, and SR 520 Alternative would all threaten the long-term success of the City of Bellevue's vision for TOD and smart growth presented in the *Bel-Red Subarea Plan*. Any of these alternatives would:

- Ignore the *Bel-Red Subarea Plan* effort that was crafted to guide the light rail alignment to maximize TOD.
- Be inconsistent with the Bel-Red Subarea Plan, land use planning, and current zoning.
- Fail to support the considerable public and private investment that is already occurring in the Bel-Red Subarea consistent with local and regional planning.
- Send the wrong message to the market about the City's commitment to TOD and smart growth.
- Result in the loss of millions of dollars in local revenue based on the anticipated Bel-Red Subarea transformation, particularly around the stations, undercutting the City's ability to fund the infrastructure needed for the plan and putting the redevelopment of this area at greater risk.

The Department of Planning and Community Development stated the *Bel-Red Subarea Plan* and related land use regulations represent a decade-long planning effort to fundamentally change the area's historically industrial focus to a community planned around and enhanced by transit. Siting a 25-acre OMSF in the heart of this community is a short-sighted investment of regional taxpayer dollars with lasting impacts. It also criticized the Draft EIS impact analysis for the following reasons:

- Lacking creative and innovative alternatives that reduce footprint and impacts. The State
 Environmental Policy Act (SEPA) emphasizes viable alternatives that first avoid and then
 minimize environmental impacts. The Draft EIS fails to review viable alternatives, even those
 encouraged by the Sound Transit Board, suggested by City of Bellevue staff, and endorsed by
 the Urban Land Institute panel of experts that visited the build alternative sites.
- Failing to address opportunity costs. The Draft EIS focuses much of its analysis on the current
 uses around the three build alternative sites in Bellevue. The Final EIS must address expected
 impacts from loss of existing development and expected redevelopment.
- Inadequately discussing cumulative impacts. The Draft EIS lacks any discussion of the potential for cumulative impacts that may result from East Link operations being affected by an OMSF at any of the Bellevue build alternative sites.
- Inadequately addressing impacts on future park resources. Multiple agencies have invested in a future regional trail along the Eastside Rail Corridor, and the City of Bellevue has established park and trail locations through its planning processes. The Draft EIS fails to identify many of these resources as Section 4(f) resources or deals with them inconsistently through the document.

The department also submitted many detailed comments on the impact analysis.

5.3.4 Tribes

The Muckleshoot Indian Tribe commented on its treaty-protected fisheries resources. The comment letter requests that the BNSF Alternative and BNSF Modified Alternative be pursued to avoid impacts on Scriber Creek under the Lynnwood Alternative or Goff Creek under the SR 520 Alternative. The tribe also provided technical comments on the Draft EIS analysis.

5.4 Comments Received from Businesses, Organizations, and Individuals

5.4.1 Businesses

Four businesses located in the Lynnwood Alternative site commented in opposition to that alternative. They opposed the alternative because it is inefficient (because a second site would be required on the Eastside); it would have adverse impacts on neighborhoods and small businesses in the area, including residents from minority or low-income backgrounds for whom English is a second language; it would displace the DSHS office, which provides essential services to low-income, senior, and disabled citizens; it has the greatest capital and operating costs; and it would affect parks and wetlands.

Nineteen businesses commented on the three build alternatives located in Bellevue. Fifteen of the businesses opposed the SR 520 Alternative and supported the BNSF Alternative and BNSF Modified Alternative, while three of the businesses opposed the BNSF Alternative and BNSF Modified Alternative. One business did not comment in favor of or opposition to any alternative.

Eleven tenants of Plaza 520 (located in the SR 520 Alternative site) opposed the SR 520 Alternative. Harsch Investment Properties stated that 40 local tenants, including businesses and not-for-profits, would be displaced. All tenants voiced concerns on the impacts of small business displacement and the hardships, or even impossibility, of relocating. Other concerns included impacts on Goff Creek, the use of land for industrial purposes in the Bel-Red Subarea, and potential impacts on the Bridle Trails neighborhood. These commenters supported the BNSF Alternative and BNSF Modified Alternative because Sound Transit already owns part of those sites, and because those alternatives provided some opportunity for TOD.

Approximately 31 comments from businesses and individuals opposed the SR 520 Alternative because it would displace the Mosaic Children's Therapy Clinic. The clinic provides physical, occupational, and speech/language therapy, social/thinking groups, nutrition, behavioral and educational consulting and child psychology services from birth through adolescence.

In addition to the letters opposing the SR 520 Alternative, a petition with 139 electronic signatures was submitted.

Two auto dealers wrote in opposition of the SR 520 Alternative. They opposed the displacement of the car lot and its "70 well-paying middle class jobs," and because of construction impacts and impacts on auto inventory in the area.

Pine Forest Properties has submitted the Pine Forest Master Development Plan application to the City of Bellevue for approximately 2 million square feet of TOD mixed uses adjacent to the future 120th Avenue Station. It objected to the BNSF Alternative and BNSF Modified Alternative, because they would use land planned for TOD.

Wright Runstad & Company is the developer of the Spring District, which it considers a catalyst designed to accelerate TOD in the Bel-Red Subarea. It criticized the Draft EIS' analysis of the BNSF Alternative and BNSF Modified Alternative because it did not:

- Adequately analyze the impact of removing over 25 acres of developable land from the walkshed of the 120th Avenue Station.
- Analyze the impacts of displacing future redevelopment expected at each alternative site.
- Adequately analyze the economic impacts on the City and Sound Transit of removing the build alternative's property from development.
- Address the OMSF's incompatibility with the development required under Bel-Red Subarea zoning.
- Address the visual and noise impacts on future development.

- Analyze the build alternatives with the future conditions of 120th Avenue NE as a five-lane multimodal arterial.
- Analyze the loss of transportation impact fees and other development fees associated with potential development actions based on rezoning efforts.
- Analyze the OMSF's proximity to Link light rail transit stations and consistency with Sound Transit's mission.

Barrier (Audi) prepared a letter that echoed the concerns of Wright Runstad & Company.

5.4.2 Organizations

The Save Scriber Creek Park and Wetlands Group commented that Lynnwood's high quality, category II Wetlands must be preserved and protected and objected to the Lynnwood Alternative for the following reasons:

- It would impair people's ability to enjoy the Interurban Trail and Scriber Creek Park.
- It would destroy wildlife habitats.
- It would displace the DSHS office and adversely affect people in the area who rely on it.
- It would impact an established residential neighborhood across the street.

The organization also submitted a petition with 1,683 signatures and an online petition with 46 electronic signatures in opposition to the Lynnwood Alternative because of ecological and community impacts. The petition was previously sent to Sound Transit in opposition to the C1 and C2 Lynnwood Link alignments.

The Eastside Rail Corridor Regional Advisory Council requested that Sound Transit work with it to develop plans that ensure public access and multiple uses if the OMSF is sited on one of the three Bellevue sites.

Snohomish County Public Utilities District No. 1 (SnoPUD) identified areas where the Lynnwood Alternative would conflict with existing and planned electrical transmission and distribution facilities, and provided considerations about the design of the OMSF should the Lynnwood Alternative be advanced. It could not determine if sufficient electrical capacity was available without additional load information and project details.

The Cedar Valley Grange No. 306, located across the street from the Lynnwood Alternative site, submitted a letter in opposition to the Lynnwood Alternative because the OMSF would not improve the neighborhood and would have adverse impacts on the Edmonds School District's plans and on the community.

The Quality Growth Alliance did not comment on any specific alternative, but rather requested that Sound Transit consider an OMSF site that does not present an obstacle to future development. It emphasized siting the OMSF in a way that would support adopted TOD policy as well as regional and City plans.

NAIOP, a commercial real estate development association for owners and investors in industrial, office, and related commercial real estate, opposed development in the Bel-Red Subarea for transportation use, rather than TOD.

The Bellevue Downtown Association opposed the Bellevue alternatives. It found the sites to be inconsistent with the *Bel-Red Subarea Plan* (City of Bellevue 2009) and stated that displacement of businesses and future tax revenue losses should have been analyzed in the Draft EIS.

The Bellmeade Association (a part of the Bridle Trails neighborhood) opposed the SR 520 Alternative site because of its proximity to the Bridle Trails neighborhood and its displacement of businesses that serve the neighborhood.

The Winchester Estates Homeowners Association, Bridle Trails Community Club, and other Bridle Trails communities also submitted comments objecting to the SR 520 Alternative.

5.4.3 Individuals

Sound Transit and FTA received approximately 696 comments from individuals, either in writing or through testimony at the public hearings. Generally, comments focused on support or opposition to one of the build alternative sites. A high-level summary of individual comments is provided below.

5.4.3.1 Lynnwood Alternative

There was little support for the Lynnwood Alternative from Lynnwood residents. A few supported the alternative for bringing jobs to the city and for developing the site with electric trains, as opposed to the Edmonds School District's diesel buses, the majority opposed it for the following reasons:

- The site would have greater impacts on high-value ecological resources (Scriber Creek and wetlands) than the other build alternatives.
- The proposed project would hinder the Edmonds School District plans to develop the site.
- The proposed project would affect the adjacent Scriber Creek Park.
- The proposed project would affect the adjacent residential neighborhood, including low-income and minority populations.
- The proposed project's displacement of the DSHS facility would affect a vulnerable population.

In general, comments supporting the Lynnwood Alternative came within comments from persons opposing one of the other build alternatives. Sound Transit also received two hand-signed petitions and one online petition opposing it. One of the hand-signed petitions contained 1,290 signatures concerned about environmental impacts on wetlands and wildlife habitat and the quality of life for nearby residents and businesses.

5.4.3.2 BNSF Alternative

The BNSF Alternative had the most support of all of the build alternatives; many comments indicated it was the best choice because it was in an area where land use is industrial and better-suited for more intense land use than the Lynnwood Alternative and SR 520 Alternative sites. Others supported it because of its proximity to the former rail corridor, or due its lower capital and operational costs. Some commenters supported this alternative because it would have the fewest ecological impacts. Opposition to the BNSF Alternative was in large part due to its use of land otherwise available for TOD, or because it would impede redevelopment of the Bel-Red Subarea. Concerns were also voiced regarding its impact on the Eastside Rail Corridor multiuse trail.

5.4.3.3 BNSF Modified Alternative

Support for and opposition to the BNSF Modified Alternative were based on reasons similar to those described above for the BNSF Alternative. A minority of commenters who supported both the BNSF Alternative and BNSF Modified Alternative found the BNSF Modified Alternative to be the superior alternative because it would create more surplus land available for redevelopment and provide a buffer to future TOD development. Opposition to the BNSF Modified Alternative was based on its displacement of businesses on 116th Avenue NE and 120th Avenue NE. Concerns were voiced regarding its impact on the Eastside Rail Corridor multiuse trail.

5.4.3.4 SR 520 Alternative

Sound Transit received the most individual comments in opposition to the SR 520 Alternative site. A form letter email, sent by approximately 424 people, stated it was unacceptable for the following reasons:

- Displacement of local businesses and not-for-profit organizations that serve the community.
- Impacts on Goff Creek.
- Incompatibility with land uses and land use plans.
- Impacts on quality of life for the Bridle Trails community.

Other commenters rejected the SR 520 Alternative site for similar reasons. Two commenters supported it for its ability to serve the light rail system.

5.5 Suggestions for Other Alternatives

Most comments focused on the alternatives analyzed in the Draft EIS, but Sound Transit received a few comments with suggestions for other alternatives. Seven comments suggested the OMSF site be located either farther to the north closer to Everett or farther east in Redmond; one suggested locating it in downtown Seattle; another suggested the Interstate 5/Alderwood Mall Parkway/State Route 525 intersection; and one suggested reexamining the Redmond E-5 site that was rejected during the site screening process.

5.6 Responses to Common Comments

Appendix I, *Comments and Responses*, includes responses to each of the comments received during the Draft EIS comment period. Table 5-2 provides responses to the most common comments. They are organized in the table by the applicable chapter and resource section of this Final EIS. These responses are also referenced in Appendix I, *Comments and Responses*, using the comment number found in the left column of the table.

Table 5-2. Responses to Common Comments on the Draft EIS

Common Comment Number	Common Theme	Common Response
Chapter 1. Purpose	and Need	
1	The Lynnwood Alternative does not meet the cost goal.	The financial goal for the proposed project is financial feasibility—in other words, build, operate, and maintain a cost-effective facility. All build alternatives are financially feasible and can be developed and supported by ST2 tax revenue. Therefore, all build alternatives in the EIS meet the cost goal. Costs for the build alternatives vary. Capital costs of the proposed project—including property acquisition, relocation, construction, and design, permitting, and administrative costs—are described in this Final EIS (Chapter 2, Section 2.9, Funding and Estimated Project Costs). The Lynnwood Alternative would have the lowest property and relocation costs, but second-highest construction costs. This is due to the costs for designing and constructing two separate facilities and the length of the elevated lead track. As described in Section 2.9, the Lynnwood Alternative would have the highest annual operating costs (\$66 million) because it needs a separate storage track facility in Bellevue and staff to operate and maintain two separate facilities.
Chapter 2. Alternati	ves Considered	
2	Why are Design Options C1 and C2 of the Lynnwood Alternative evaluated when they are no longer part of the Lynnwood Link EIS?	There were several Lynnwood Link Extension alternatives under consideration when the OMSF Draft EIS was published. Three design options of the Lynnwood Alternative (C1, C2 and C3) were developed to integrate with all Lynnwood Link Extension alternatives being studied. On April 23, 2015, the Sound Transit Board of Directors adopted Motion No. M2015-33, which selected the Lynnwood Link Extension alternative to build. The OMSF Final EIS evaluates the OMSF Lynnwood Alternative with a lead track connection to the Lynnwood Link Extension project selected by the Sound Transit Board, which is a modified version of the C3 alignment studied in the Lynnwood Link Extension and OMSF Draft EIS documents.
3	The Draft EIS does not consider alternatives that include redesigning or reducing the size of the OMSF and does not include mitigation measures that would minimize impacts by redesigning or reducing the size of the OMSF.	As described in Chapter 2, <i>Alternatives Considered</i> , in order to accommodate future operations, the future OMSF is designed to serve up to 96 LRVs, requiring approximately 20 to 25 acres of usable land. Following the completion of the Draft EIS comment period and the ULI Advisory Services Panel review, the Sound Transit Board identified the BNSF Alternative as the preferred alternative for evaluation in the Final EIS (Motion 2014-51). The Board's action directed Sound Transit staff to maximize TOD potential on and surrounding the OMSF site; design the proposed project to maximize compatibility with the <i>Bel-Red Subarea Plan</i> ; consider the ULI Advisory Services Panel's recommendations; and work with the City of Bellevue and interested stakeholders "with the goal of developing a preliminary design that integrates the OMSF with the surrounding land uses." Sound Transit and the City of Bellevue assembled a stakeholder group comprising agency personnel, former City of Bellevue planning officials and Planning

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Comment Number	Common Theme	Common Response Commission members, neighboring property owners and neighborhood representatives, TOD advocacy representatives, and private developers advancing TOD in the vicinity of the 120th Avenue Station. The stakeholder group met on September 18, October 9, and October 27, 2014. The stakeholder group refined the OMSF site layout and footprint for the Preferred Alternative, and offered concepts to refine the other build alternatives under consideration. Sound Transit has refined its design by reducing the footprint by approximately 9% (From 23 to 21 acres). It moved the OMSF buildings north to allow more land for TOD at the southern portion of the site, nearest to the East Link 120th Avenue Station area, providing an additional 25-foot setback OMSF footprint from 120th Avenue NE to allow site screening and frontage improvements, and revised the maintenance building location and configuration to avoid building over an existing King County sanitary sewer trunk line. Please refer to the discussion of the Preferred Alternative in Chapter 2, Alternatives Considered, of the Final EIS. Concepts developed for the other build alternatives, though not incorporated into design at this point, would similarly provide site footprint reductions and allowances for co-development or other uses on surplus lands. A
		summary of these concepts is provided in Chapter 2, Section 2.4, <i>ULI Advisory Services Panel and Stakeholder Concepts</i> .
		The Final EIS also considered a redesigned project alternative that would operate the OMSF on two separate, smaller sites. Please see Chapter 2, Section 2.3, <i>Identifying Potential OMSF Sites</i> , and Appendix F.1, <i>Additional Detail on the Two Site OMSF Option</i> , of this Final EIS for additional detail.

Common Comment Number	Common Theme	Common Response
4	Reconsider a Redmond Alternative.	One of the proposed project's screening criteria established for the OMSF was that the alternative sites be near an existing or funded future light rail segment. A Redmond site did not meet that criterion.
		The E-5 site, also referred to as the Redmond site, was considered during the site identification process, but not advanced. As described in Chapter 2, Table 2-1, <i>Potential and Suggested Alternatives</i> , of this Final EIS, it was not advanced because it would require building 4 miles of light rail guideway along with a lead track, causing substantial capital and operating costs.
Chapter 3. Affected	Environment and Environmental Co	nsequences
3.1 Transportation		
5	The transportation analysis for the East Link project did not include impacts of the OMSF build alternatives. Additional transportation analysis will be required.	Cumulative effects from implementing the East Link Project in combination with the Bellevue Alternatives (Preferred Alternative, BNSF Modified Alternative, and SR 520 Alternative) are considered in the Final EIS under each environmental resource area including transportation effects. No additional transportation analysis is required.
6	Loss of transportation impact fees that would otherwise be collected from new development at the OMSF site was not considered.	Transportation impact fees exist to assist local governments in recovering the costs they incur to provide transportation facilities to serve new development. As outlined in Chapter 3, Section 3.1, <i>Transportation</i> , of this Final EIS, the build alternatives would result in net decreases in traffic generated on local roadways compared to the existing land uses on those sites. As a result, the local governments would not be required to incur costs for transportation facilities to serve the selected alternative, and impact fees would not be applicable. Although construction of the proposed project would eliminate the possibility for new and/or more intensive development of the Preferred Alternative site and the City of Bellevue would not collect impact fees for that new and/or more intensive development, the city would also not experience the related increases in traffic demand associated with that new development.
3.2 Acquisitions, Dis	placements, and Relocations	
7	The EIS analysis should also include the number of existing jobs permanently displaced under each build alternative compared to planned and permitted uses at each site.	Chapter 3, Section 3.2, Acquisitions, Displacements, and Relocations, of this Final EIS provides information on the parcels that would be acquired to construct the proposed project, existing land uses that would be displaced, and the potential for relocating those uses. Section 3.4, Economics, addresses demographic and economic trends, as well as local revenue sources. Table 3.4-5, Property Acquisition Impacts on Businesses and Employees, provides estimates of the number of businesses located on properties that would be acquired by the build alternatives and lists the estimated number of employees at those businesses. Analysis of uses that would be allowed by zoning, but not yet planned or permitted, at the build alternative sites would be

Common Comment Number	Common Theme	Common Response
		speculative. Therefore, the number of jobs permanently displaced under each alternative was based on the existing uses or reasonably foreseeable future development as defined in Chapter 3, Section 3.0.1, <i>Potential for Future Development—Preferred Alternative</i> .
8 Generally opposed to SR 520 Alternative site due to displacement of businesses. Specific opposition to the SR 520 Alternative due to displacement of MOSAIC Children's Therapy	Sound Transit acknowledges the SR 520 Alternative would result in the most displacements among the build alternatives. Thirteen parcels would be acquired, which would displace approximately 101 commercial land uses. Two of the 13 parcels would be partially acquired, required for the development of a lead track to the OMSF. Subsequent to scoping for the Draft EIS, modifications to the conceptual design of the SR 520 Alternative site were made in an effort to reduce business displacement.	
	Clinic.	Sound Transit would provide relocation assistance to displaced businesses as described in Chapter 3, Section 3.2, <i>Acquisitions, Displacements, and Relocations</i> , of this Final EIS. Therefore, it is likely that many of the displaced jobs would be relocated and not lost. However, some displaced businesses and jobs with specialized spatial needs would probably relocate outside the Bel-Red Subarea. Sound Transit would compensate affected property owners as specified in Sound Transit's adopted Real Estate Property Acquisition and Relocation Policy, Procedures, and Guidelines (Resolution #R98-20-1). Sound Transit would comply with the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (49 CFR 24, as amended), and the State of Washington's relocation and property acquisition regulations (WAC 468-100 and RCW 8.26). Benefits would vary depending on the level of impact, available relocation options, and other factors. Sound Transit acknowledges that MOSAIC Children's Therapy Clinic is a specialized private business with specific needs for the amount and type of space. Given the current availability of commercial office space in Bellevue and projected future availability of commercial space (i.e., new office and retail development called for in the <i>Bel-Red Subarea Plan</i>), the clinic could probably relocate in the vicinity.
9	Edmonds School District has plans for the property Sound Transit would purchase as part of the Lynnwood Alternative.	Sound Transit is aware of the Edmonds School District's plans to develop the property for its District Support Services Center. Sound Transit has been coordinating with the school district in an effort to determine if joint development would be feasible. Joint development would involve implementing the Lynnwood Alternative in a way that would allow for the district to use the portion of the Lynnwood Alternative site not needed for the OMSF. Edmonds School District has indicated it is not interested in pursuing a joint development scenario with Sound Transit at this location. Chapter 3, Sections 3.3, Land Use; 3.5, Section 3.5, Social Impacts, Community Facilities, and Neighborhoods; 3.15, Public Services; and 3.18, Parklands and Open Space in this Final EIS acknowledge the Edmonds School District plans.

Common Comment Number	Common Theme	Common Response
3.3 Land Use		
10	The SR 520 Alternative is inconsistent with the <i>City of Bellevue Comprehensive Plan</i> .	While the OMSF is not listed as a permitted use in any of the Bel-Red Subarea zoning designations, all Bel-Red zoning designations (including BR-GC) conditionally allow "Rail Transportation: right-of-way, yards, terminals, and maintenance shops" subject to Sound Transit obtaining a Conditional Use Permit or a land use code amendment from the City of Bellevue. Please see Chapter 3, Section 3.2, <i>Land Use</i> , of this Final EIS for additional discussion of land use consistency.
11	Environmental review did not fully consider <i>Bel-Red Subarea Plan</i> , zoning, TOD, and master plans.	Chapter 3, Section 3.3, Land Use, of this Final EIS acknowledges the goals and policies of the Bel-Red Subarea Plan and discusses the impacts of the conversion of lands in the Bel-Red Subarea into public transportation uses. Chapter 3, Section 3.3, Land Use, also discusses the Spring District Master Plan in the context of cumulative impacts. Section 3.4, Economics, summarizes the anticipated impacts of the build alternatives on local and regional economies regarding business displacements and changes in tax revenue. The Final EIS acknowledges and considers potential impacts to future development anticipated as part of adopted master plans near the OMSF, such as the Spring District Master Development Plan. Sound Transit has considered the site modifications recommended by the Urban Land Institute panel of experts and has incorporated various elements of the panel's recommendations into the design of the Preferred Alternative, such as reducing the OMSF footprint in an effort to better meet the goals of the Bel-Red Subarea Plan and to maximize opportunities for TOD in the area. As described in Chapter 2, Alternatives Considered, and Chapter 3, Section 3.0.1, Potential for Future Development, conceptual future development scenarios at the BNSF Alternative site resulted from the ULI panel and stakeholder review processes and ongoing coordination with the City of Bellevue. The layout for the BNSF Alternative site would allow for up to five parcels to be available for potential future development, with roadway access to 120th Avenue NE. Potential environmental impacts of the OMSF on future development under the Bel-Red Subarea Plan and Spring District Master Development Plan is discussed under each environmental resource area (Chapter 3, Sections 3.1 through 3.18) in the Final EIS under the Cumulative Impacts discussions. These discussions take into account reasonably foreseeable future projects in the vicinity of the build alternative sites, including approved master development plans and other relevant projects. T

Common Comment Number	Common Theme	Common Response
12	Discussion of the build alternatives in Bellevue focuses too much on current uses instead of future uses. It must address impacts from loss of existing development and potential redevelopment.	Chapter 3, Section 3.3, <i>Land Use</i> , of the Final EIS discusses both existing land uses and maximum future development potential under current zoning. It also describes potential changes in land use that could occur as a result of the proposed project, and evaluates the consistency of the proposed project with local and regional planning policies.
13	The Sound Transit TOD policy should be included as a governing document. The BNSF Alternative and SR 520 Alternative sites conflict with Sound Transit's adopted TOD policy.	Sound Transit's TOD policy (contained in Resolution R2012-24) declares that it is Sound Transit's primary responsibility to complete and expand the high-capacity transit system to deliver transit service that connects the region's urban centers, which is a key step toward meeting local and regional land use goals, including the <i>Bel-Red Subarea Plan</i> . It also establishes goals to foster relationships with local jurisdictions, regional agencies, private developers, local residents, businesses, community groups, and other stakeholders to facilitate TOD. Sound Transit acknowledges that the OMSF would use land planned for future redevelopment (Chapter 3, Section 3.3, <i>Land Use</i> , Tables 3.3-1 and 3.3-2). As described in Chapter 2, <i>Alternatives Considered</i> , the Preferred Alternative includes refinements to maximize TOD potential at and surrounding the OMSF. Sound Transit is committed to employing strategies to help integrate the OMSF into the surrounding land uses and promoting TOD near the future 120th Avenue Station while achieving efficient transportation operations.
14	Section heading is "Urban Land Institute Analysis" but half of the section describes market analysis and building podium studies by Kidder Matthew, not the Urban Land Institute. Section does not include Urban Land Institute panel's recommended strategies for the four build alternatives. All panel materials should be added to the EIS record.	The Kidder Mathews (2013) analysis was prepared in anticipation of the work by the Urban Land Institute panel of experts. The Kidder Mathews document provided a market-based initial assessment of feasibility for development at the build alternative sites, examining physical constraints, operational impacts, market feasibility, and constructability considerations. The panel used it to help support its effort in documenting observations and providing recommendations to the Sound Transit Board. Chapter 2, <i>Alternatives Considered</i> , of the Final EIS has been updated to summarize observations and recommendations of the ULI Advisory Services Panel more thoroughly than was included in the Draft EIS. In addition, the ULI Report is included in Appendix F.5, <i>Urban Land Institute Advisory Services Panel Report</i> , of this Final EIS.
15	Heavy Industrial use is not consistent with the City of Bellevue's land use planning.	All build alternatives would convert existing non-transportation uses to transportation-related land uses. The OMSF is not a listed permitted use in any of the Bel-Red Subarea zoning designations. However, all Bel-Red zoning designations conditionally allow "Rail Transportation:

Common Comment Number	Common Theme	Common Response
		right-of-way, yards, terminals, and maintenance shops" subject to Sound Transit obtaining a Conditional Use Permit or a land use code amendment from the City of Bellevue.
3.4 Economics		
16	Analysis fails to address opportunity cost and losses to Bellevue tax revenues.	NEPA and SEPA do not require an analysis of economic opportunity costs of land use decisions, but rather an evaluation of environmental and economic impacts on existing and reasonably foreseeable land uses for each build alternative.
		Chapter 3, Section 3.4, <i>Economics</i> , addresses impacts of the build alternatives on tax revenues. Based on 2012 property tax revenues, the Preferred Alternative, BNSF Modified Alternative, and SR 520 Alternative would result in a losses of approximately 0.63%, 0.78%, and 0.86%, respectively, of the City of Bellevue's property tax revenues. While initial property tax revenues would be affected, many displaced businesses could relocate elsewhere within Bellevue. Since the OMSF may facilitate future development, long-term property tax impacts would be less adverse once businesses are reestablished and Sound Transit has increased its operations.
17	BNSF Alternative and BNSF Modified Alternative jeopardize TOD investments.	The EIS has analyzed impacts related to approved TOD projects like the Spring District in terms of visual resources, noise, and traffic and concluded that the proposed project would not result in adverse impacts. Please see Chapter 2, <i>Alternatives Considered</i> , and Chapter 3, Sections 3.3, <i>Land Use</i> and 3.4, <i>Economics</i> , for discussion of TOD potential with the refinements made to the Preferred Alternative.
3.5 Social Impacts, 0	Community Facilities, and Neighborh	noods
18	Consider construction impacts on Bellevue residents.	Construction impacts are discussed for each environmental resource area. As described in Chapter 3, Section 3.5, Social Impacts, Community Facilities, and Neighborhoods, few residents are located to the west of the BNSF Alternative and BNSF Modified Alternative sites, and those located near the SR 520 Alternative site are located across SR 520, which serves as a barrier between residents and the area where construction would occur. Section 3.5 states that typical construction impacts would include temporary increases in noise, dust, and construction-related traffic.
19	Impacts on future minority populations living within the study area in Bellevue should be analyzed.	Chapter 3, Section 3.5, Social Impacts, Community Facilities, and Neighborhoods and Appendix C, Environmental Justice, discusses impacts on minority populations based on existing demographic information for the study area. Determining the future location and prevalence of minority populations is speculative. This Final EIS analyzes potential impacts from OMSF operations as well as cumulative impacts, which includes consideration of reasonably foreseeable future actions.

Common Comment Number	Common Theme	Common Response
20	Concerns regarding impacts on Bridle Trails neighborhood.	As stated in Chapter 3, Section 3.4, <i>Economics</i> , development of the OMSF could have effects on nearby property values, but at any given location property values are influenced by many factors such as consumer confidence, local development pressures, regulatory conditions, and fluctuations in the regional economy. As stated in Section 3.5, <i>Social Impacts, Community Facilities, and Neighborhoods</i> , SR 520 acts as a barrier between the alternative sites and the Bridle Trails neighborhood. Furthermore, as described in Section 3.6, <i>Visual and Aesthetic Resources</i> , the Bridle Trails neighborhood's views of the OMSF would be blocked by SR 520, existing vegetation, and landforms. As described in Section 3.8, <i>Noise and Vibration</i> , there are no Bridle Trails residences within 700 feet of the SR 520 Alternative site or any other alternative; therefore, no noise impacts under FTA noise criteria would result. Sections 3.1, <i>Transportation</i> , and 3.8, <i>Noise and Vibration</i> , show that no significant impacts related to traffic or noise are anticipated under the SR 520 or any other OMSF build alternative.
21	Concerns regarding loss of DSHS, impacts on local employees and businesses in Lynnwood. Possible environmental injustice to displace DSHS building.	As described in Chapter 3, Section 3.5, Social Impacts, Community Facilities, and Neighborhoods, and Appendix C, Environmental Justice, the DSHS facility could probably be relocated within the City of Lynnwood based on current vacancy rates and the availability of similar office buildings in Lynnwood. In addition, there are other similar DSHS social service offices in the vicinity of the Lynnwood Alternative site that could provide these services. The proposed project would, therefore, not result in a permanent reduction in the availability of social services in the City of Lynnwood, and would not have a disproportionately high and adverse impacts on environmental justice populations.
3.6 Visual and Aesth	netic Resources	
22	Analysis should include planned adjacent uses during 2020–2023 timeframe, as described in the Spring District Master Development Plan and Pine Forest Master Plan.	The introduction to Chapter 3 lists the Reasonably Foreseeable Future Actions considered in the analysis. Chapter 3, <i>Affected Environment and Environmental Consequences</i> (Table 3-2), lists the Spring District development as a new urban center located within the Bel-Red Subarea with 16 urban blocks designed to focus on connectivity to downtown Bellevue, surrounding communities, and the greater Eastside; 5,300,000 square feet of mixed-use residential, office, and retail space are proposed. In its analysis of the OMSF's cumulative impacts in the context of reasonably foreseeable projects such as the Spring District, this Final EIS (particularly Chapter 3, Sections 3.2, <i>Acquisitions, Displacements, and Relocations,</i> 3.3, <i>Land Use,</i> 3.6, <i>Visual and Aesthetic Resources,</i> and 3.8, <i>Noise and Vibration</i>), found no substantial adverse impacts. As of August 2015, the City of Bellevue has not approved the <i>Pine Forest Master Plan</i> ; the status of the plan application is reported by the City of Bellevue to be incomplete.
23	Visual analysis does not consider impacts of the BNSF Alternative	Chapter 3, Section 3.6, <i>Visual and Aesthetic Resources</i> , analyzes potential operational, indirect, and cumulative impacts of the proposed project on the Spring District and Children's Hospital:

Common Comment Number	Common Theme	Common Response
Comment Number	and BNSF Modified Alternative on reasonably foreseeable development.	Bellevue Clinic and Surgery Center expansion projects. As of August 2015, the City of Bellevue has not approved the <i>Pine Forest Master Plan</i> , and the plan application is under review.
3.8 Noise and Vibra	tion	
24	Consider intended uses not existing uses in noise mitigation.	Chapter 3, Section 3.8, <i>Noise and Vibration</i> , qualitatively analyzes noise impacts on planned and permitted uses, for example, the proposed development in the Spring District and Seattle Children's Hospital: Bellevue Clinic and Surgery Center expansion. The noise analysis for consistency with local noise ordinances (Bellevue and Lynnwood) considers intended land uses because the local noise criteria are based on zoning designations, not actual uses. The noise analysis related to local noise code compliance in the Final EIS does consider intended, future uses.
25	Concerns about noise impacts on Seattle Children's Hospital.	The noise analysis in Chapter 3, Section 3.8, <i>Noise and Vibration</i> of the Final EIS has been updated to include construction noise levels at the Seattle Children's Hospital: Bellevue Clinic and Surgery (Table 3.8-6). Construction would result in noise levels of up to 84 dBA L _{max} during construction of the access track. The construction phases and potential worst-case noise levels from different locations at the OMSF and access tracks are provided in Table 3.8-7. Sound Transit would limit construction noise levels and meet applicable noise regulations and ordinances. Predicted operational noise levels were based on the analysis and prediction methods from the FTA and measured noise levels from similar existing OMSF facilities, and included noise from general operations, the car wash, vehicles moving around the yard, and LRVs (Table 3.8-7). The analysis identified no adverse noise impacts on the hospital. The OMSF's most notable noise-producing activities would occur on the side of the OMSF farthest from the hospital. Structures on the site would also shield some operations from the hospital, although no shielding from structures were included in this analysis, and therefore the predicted noise levels are likely to be 3 to 5 dB higher than the actual operational noise levels, which are below the applicable criteria from the FTA and the City of Bellevue.
3.9 Ecosystems		
26	Impacts on Goff Creek should be avoided/replacing the open-stream channel with a pipe is inconsistent with the <i>Bel-Red Subarea Plan</i> strategy of enhancing stream systems as	Chapter 3, Section 3.9.6.2, <i>Compensatory Mitigation</i> , acknowledges that replacing the open channel of Goff Creek with a pipe is inconsistent with the <i>Bel-Red Subarea Plan</i> strategy of enhancing stream systems as redevelopment occurs. Should the SR 520 Alternative be pursued by Sound Transit, Sound Transit would work with the City of Bellevue during final design and permitting to determine appropriate mitigation. There is potential for rerouting Goff Creek to a

Common Comment Number	Common Theme	Common Response
	redevelopment occurs. Preserve Goff Creek.	partially daylighted channel along the western and southern edges of the SR 520 Alternative Site.
27	Concerns about Lynnwood Alternative due to potential impacts on Scriber Creek wetlands.	Chapter 3, Section 3.9, <i>Ecosystems</i> (Section 3.9.4.3), discusses potential construction and operational impacts on Scriber Creek wetlands, including the potential for 1.6 to 1.8 acres of permanent impact on the western side of Wetland N1-1 (reducing the wetland size by 8%). Section 3.9.3.1 identifies the Scriber Creek wetland as a Priority Habitat in the Washington Department of Fish and Wildlife Priority Habitats and Species database and as a City of Lynnwood critical habitat and describes (Section 3.9.4.3) the wetland's water quality and hydrologic functions as well as its wildlife habitat functions (e.g., temporal loss and shifts in vegetation communities from forested to scrub-shrub as a result of the elevated guideways across the center of the wetland). The Final EIS identifies potential mitigation for impacts on the wetland.
3.18 Parklands and	Open Space and 4.0 Section 4(f) Res	sources
28	Effects of the BNSF Alternative and BNSF Modified Alternative on the future Eastside Rail Corridor trail is not fully analyzed, including assessment of the trail for Section 4(f) protection.	The Eastside Rail Corridor is railbanked, which keeps the corridor available for interim trail use or for the reactivation of freight rail service in the future. Sound Transit now owns this portion of the Eastside Rail Corridor; King County owns a trail easement over the Eastside Rail Corridor and will comply with federal railbanking requirements. Sound Transit is committed to working with stakeholders and will continue to engage with the Eastside Rail Corridor Regional Advisory Council to ensure the council's interests are considered throughout the design process and obligations of the railbanking agreement are upheld. Design of the Preferred Alternative and BNSF Modified Alternative considered the railbanked status of the corridor. Neither would preclude development of the corridor into a trail in the future. The two internal vehicle/rail crossings under the BNSF Modified Alternative, at the north and south ends of the BNSF Modified site, would be on bridge structures and would not affect trail users. In addition, as described in Chapter 3, Section 3.18, Parklands and Open Space, the Preferred Alternative includes an interim trail in the Eastside Rail Corridor. As an interim trail, it would not be developed in the final condition or configuration of the future Eastside Rail Corridor regional trail, but would provide opportunities for trail use until the regional trail is designed, funded, and built. Therefore, no adverse impacts are anticipated. Appendix D, Section 4(f) and Section 6(f) Evaluation, of the Final EIS includes a discussion of the Eastside Rail Corridor relative to the requirement of Section 4(f). Whether or not a trail is developed within the Eastside Rail Corridor, because the corridor is formally reserved for a future transportation use (i.e., reactivation of freight), it does not qualify as a Section 4(f) resource.

Common Comment Number	Common Theme	Common Response
29	Concerns regarding impacts on the Cedar Valley neighborhood resulting from the Lynnwood Alternative	As described in Chapter 3, Section 3.5, Social Impacts, Community Facilities, and Neighborhoods no residential displacements in the neighborhood would occur. The proposed project would replace existing commercial and vacant land/open space with the OMSF. As stated in Chapter 3, Section 3.4, Economics, development of the OMSF could affect nearby property values. However, at any given location, property values are influenced by many factors, such as consumer confidence, local development pressures, regulatory conditions, and fluctuations in the regional economy. Regarding land use compatibility and noise impacts on surrounding neighborhoods, the Final EIS acknowledges the alternative site is adjacent to a residential neighborhood. If the Lynnwood Alternative is selected to be built, Sound Transit would continue coordination with the City of Lynnwood on the design of the site, buildings, and frontage improvements to address compatibility of the OMSF with the adjacent neighborhood. Please set Chapter 3, Section 3.8.4.6, Lynnwood Alternative, of the Final EIS, which addresses concerns regarding noise impacts on the surrounding area. The noise analysis addressed residential properties in the Cedar Valley neighborhood, as well as the Cedar Valley Grange, Scriber Creek Park, Scriber Creek Trail, and the Interurban Trail. The Lynnwood Alternative would result in noise levels below FTA criteria, but above the local noise ordinance criteria at 19 properties. Noise impacts would be eliminated with a noise wall. Visual impacts on the Cedar Valley community are discussed in Chapter 3, Section 3.6, Visual and Aesthetic Resources. There would be a moderate change in the visual character along 52nd Avenue, adjacent to the neighborhood As described in the analysis, a sight-obscuring fence would surround the alternative site partially obscuring views of the OMSF operations while landscaping, required under the Lynnwood Municipal Code, would help to screen the site and enhance the visual quality.

ST2 = Sound Transit 2: Making Connections, The Regional Transit System Plan for Central Puget Sound; LRV = light rail vehicle; TOD = transit-oriented development; Lmax = maximum noise levels; CFR = Code of Federal Regulations; WAC = Washington Administrative Code; RCW = Revised Code of Washington; ULI = Urban Land Institute; FTA = Federal Transit Administration