
Section 3.0: Agency Comments

- Section 3.1: Federal agency comments and responses
- Section 3.2: State agency and representative comments and responses
- Section 3.3: County and transit agency comments and responses
- Section 3.4: Other agency and institution comments and responses



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 10
 1200 Sixth Avenue, Suite 900
 Seattle, WA 98101-3140

OFFICE OF
 ECOSYSTEMS, TRIBAL AND
 PUBLIC AFFAIRS

July 25, 2014

Ms. Karin Ertl
 Sound Transit
 Union Station
 401 S. Jackson Street
 Seattle, Washington 98104

Re: Sound Transit Long-Range Plan Draft Supplemental Environmental Impact Statement

Dear Ms. Ertl:

The Environmental Protection Agency appreciates your invitation to review and comment on the Sound Transit Long-Range Plan, and for taking time to meet with us to share the Plan highlights. We support the good work of Sound Transit as well as the Puget Sound Regional Council growth strategy, VISION 2040, designed to foster a healthy environment, vibrant communities, and a thriving economy. We also commend your efforts to work with partners at all levels to bring forward environmentally sensitive and sustainable transportation solutions.

The Long Range Transit Plan presents the Current Plan Alternative (No Action) and the Potential Plan Modifications Alternative (Action Alternative). The Potential Plan Modifications include an array of new proposed transit alignments, most of which identify a proposed mode. We offer the following comments on the Action Alternative.

We support enhanced transit in accord with VISION 2040 and its emphasis upon serving and connecting centers with high capacity transit, while taking care to protect outlying rural areas, resource lands, at risk/high value habitats, and open space from dispersed and inappropriate development. Most of the proposed new transit alignments are consistent with VISION. However, the Action Alternative also includes high capacity transit (commuter rail and light rail) alignments in outlying south Sound rural areas, and mid-County locations that currently do not have bus service. PSRC states that for high-capacity transit and centers a minimum of between 20,000 and 25,000 activity units within a square mile are needed to support one transit station¹.

While PSRC policy promotes transit (bus) service to and from existing cities in rural areas², the proposed HCT routes in south Sound rural areas appear incongruent with ridership needs and the regional growth strategy. If these HCT routes are included in the LRTP, we are concerned that they would encourage development in outlying areas with the full array of direct, indirect, and cumulative impacts to waters, rural resource lands, open space, rare prairie and oak woodland habitats and species. To avoid this, we recommend that such routes be revised in accordance with PSRC policy to provide bus service to existing rural cities.

¹ PSRC VISION 2040, Multi-county Planning Policies

² Multi-county Planning Policy, MPP-DP-16

466-1

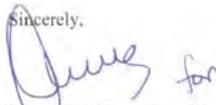
The Potential Plan Modifications Alternative (See figure 2-10 in the Final SEIS) has been revised to also include potential bus service to south Sound rural areas. These new corridors include corridor 27 - Puyallup vicinity, notably along Meridian Avenue, corridor 34 - Lakewood to Spanaway to Frederickson to South Hill to Puyallup, corridor 35 - Tacoma to Frederickson, and corridor 45 - Puyallup to Orting.

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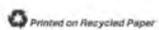
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We look forward to the next phase of Sound Transit projects and thank you for the opportunity to participate in the long range planning process. If you would like to discuss these comments, please do not hesitate to contact me at 206-553-1601 or via electronic mail at Reichgott.christine@epa.gov, or contact Elaine Somers of my staff at 206-553-2966 or via electronic mail at somers.elaine@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christine B. Reichgott".

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit



STATE REPRESENTATIVE
46th LEGISLATIVE DISTRICT
JESSYN FARRELL

State of
Washington
House of
Representatives



TRANSPORTATION (VICE CHAIR)
ENVIRONMENT
LOCAL GOVERNMENT

The Honorable Dow Constantine
Chair, Sound Transit
401 S. Jackson St.
Seattle, WA 98104

July 28, 2014

Dear Chair Constantine,

Thank you for this opportunity to comment on Sound Transit's Long-Range Plan Draft Supplemental Environmental Impact Statement. I have been an outspoken supporter of mass transit in general, and Sound Transit in particular, for most of my career, and believe that the organization has done an admirable job of delivering on the promises of ST 1, and is doing a similar job delivering ST 2. The vision laid out in the current plan (the No Action Alternative) is a good one, but I am writing today with a few suggestions I hope will be incorporated into the Long-Range Plan that will help Sound Transit achieve its vision statement of "easy connections to more places for more people".

The State Route 522 corridor is at or near capacity and is underserved by transit. Sound Transit's 522, and Metro's 306 and 312 currently serve the area. These routes are well used, and are full or nearly full at peak times. Unfortunately after April's vote, King County Metro is looking to eliminate the 306, leaving the corridor with less service, and putting even more pressure on the 312 and 522. I fully support the current vision of High Capacity Transit along this corridor, and would even go so far as to support a serious look at light rail, which would result in an extra 5,000 daily transit riders according to your own calculations.

Attention must also be given to how we move people from the SR 522 corridor to the Lynnwood Link station on NE 145th St and I-5. The area south of 145th in Seattle is growing quickly, while on the other side of the street Lake Forest Park is actively planning their Southern Gateway Plan which will drastically upzone and increase density north of 145th along State Route 522. Current service on NE 145th St is abysmal, and while light rail will do much to improve north/south transit, these east/west corridors must also be addressed for the system to function. Expecting riders to travel to the University District, Downtown, or even Northgate to transfer to a different north/south

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TOLL-FREE LEGISLATIVE HOTLINE: 1-800-562-6000 • TDD: 1-800-635-0993 • www.leg.wa.gov

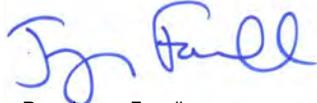
line leads to longer travel times and lower ridership. A regional express bus running along 145th from SR 522 to I-5 is listed as a potential plan modification, and is something that I would strongly encourage you to incorporate into the Long-Range Plan. This will give people from the 522 corridor an almost seamless way to reach light rail at 145th.

Another major factor that will drive your ridership numbers and ensure success is density around your light rail stations. Your December 2012 Transit-Oriented Development Policy is a good step, and I would encourage you to use it to its fullest potential to find ways to best increase residential density in station areas. The more people who can easily access the stations, the higher your ridership will be. Thought should also be given to exploring ways to make some of that housing affordable, as folks with lower incomes are more likely to be transit dependent.

419-1

With new density around stations, there is also the need to improve station area access for bicyclists, pedestrians, and bus riders. Ample bike parking and accommodations on busses and trains for bikes, and pedestrian connectivity from the surrounding neighborhoods to the stations and stops, are essential to making these lines useful and accessible to everyone. While a heavy emphasis has been put on building parking for drivers to access light rail stations, the same considerations and accommodations must be made for other users.

Thank you for your consideration of my comments, and for all of the hard work you do to make our region a better place to live and work.



Rep. Jessyn Farrell
46th Legislative District

419-1

As indicated in Appendix A of the Final SEIS, the Current Plan Alternative includes a number of access related representative projects, including many possible improvements to non-motorized access. In addition, Sound Transit's bicycle policy includes guidance on the provision of bike parking and accommodations on Sound Transit vehicles and at Sound Transit facilities. More detailed project-level analysis will be conducted in the future for projects that are implemented as part of a future system plan. The project-level analysis will include analysis of multi-modal access to stations, including non-motorized access.



STATE OF WASHINGTON
 DEPARTMENT OF ECOLOGY
 PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
 711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

July 28, 2014

Sound Transit
 Attention: Karin Ertl, Long-Range Plan Draft SEIS
 Office of Planning & Development
 Union Station
 401 South Jackson Street
 Seattle, WA 98104

Dear Ms. Ertl:

Thank you for the opportunity to comment on the draft supplemental environmental impact statement for the Regional Transit Long-Range Plan Update proposal located in Snohomish, King and Pierce Counties. The Department of Ecology (Ecology) reviewed the information provided and has the following comment(s):

SEPA REVIEWER: Marv Coleman
TOXICS CLEANUP/TACOMA SMELTER PLUME CONTACT:
Marian Abbett (360) 407-6257

This proposed project is located in an area that may have been contaminated with heavy metals due to the air emissions originating from the old Asarco Smelter in north Tacoma (visit Ecology's Tacoma Smelter Plume map search tool: <https://fortress.wa.gov/ecy/smeltersearch/>).

Soil contamination from the former Asarco Smelter poses a risk to human health and the environment. Children are at especially high risk from direct exposure to contaminated soil. Construction workers, landscapers, gardeners, and others who work in the soils are also at risk.

Ecology recommends that the lead agency include the following as conditions of approval:

- Sample the soil and analyze for arsenic and lead. The applicant shall contact Marian Abbett at the phone number given above or via email at marian.abbett@ecy.wa.gov for guidance about soil sampling within Tacoma Smelter Plume. The soil sampling results shall be sent to the local land use permitting agency and Ecology for review.
- If lead or arsenic are found at concentrations above the Model Toxics Control Act (MTCA) cleanup levels (Chapter 173-340 WAC); the owners, potential buyers, construction workers, and others shall be notified of their occurrence. The applicant shall also contact the Environmental Report Tracking System Coordinator in the

407-1

The Final SEIS recognizes the Asarco site as a high-risk hazardous materials site, identifying the site in Appendix E and showing it on Figure 4-28. Contamination from the Asarco Smelter was considered in the review of the corridors evaluated in the Final SEIS. Specific measures, including testing, notification, and remediation, would be addressed in the future during project-level reviews of individual projects that are advanced as part of a system plan. At that time, Ecology would also be afforded additional opportunities to review and comment.

407-1

July 28, 2014

Page 2

407-1

Southwest Regional Office (SWRO) at (360) 407-6300. The MTCA cleanup level for arsenic is 20 ppm and lead is 250 ppm.

- If lead, arsenic and/or other contaminants are found at concentrations above MTCA cleanup levels, the applicant shall:
 - 1) Enter into the Voluntary Cleanup Program with Ecology prior to issuance of any site development permits for this proposal and/or the initiation of any grading, filling, or clearing activities. For more information on the Voluntary Cleanup Program, visit Ecology's website at: <http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm>.
 - 2) Obtain an opinion letter from Ecology stating that the proposed soil remediation will likely result in no further action under MTCA prior to the issuance of any site development permit and/or the initiation of any grading, filling, or clearing activities. The issued site development permit plans shall be consistent with the plans reviewed and deemed consistent with MTCA by Ecology. The applicant shall provide to the local land use permitting agency the opinion letter from Ecology.
 - 3) Prior to finalizing site development permits, provide to the local land use permitting agency "No Further Action" determination from Ecology indicating that the remediation plans were successfully implemented under MTCA.

If Ecology determines this project should not be part of the Voluntary Cleanup Program, Ecology will contact the lead agency and discuss possible options.

- If soils are found to be contaminated with arsenic, lead, or other contaminants, extra precautions shall be taken to avoid escaping dust, soil erosion, and water pollution during grading and site construction. Site design shall include protective measures to isolate or remove contaminated soils from public spaces, yards, and children's play areas. Contaminated soils generated during site construction shall be managed and disposed of in accordance with state and local regulations, including the Solid Waste Handling Standards regulation (Chapter 173-350 WAC). For information about soil disposal contact the local health department in the jurisdiction where soils will be placed.

The link below provides a fact sheet that explains more how the arsenic and lead clean-up levels were set and why Ecology sees that they are protective for human health: <https://fortress.wa.gov/ecy/publications/SummaryPages/1109095.html>.

For assistance and information about Tacoma Smelter Plume and soils contamination, contact Marian Abbott at the phone number given above or via email at marian.abbett@ecy.wa.gov.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

July 28, 2014
Page 3

407-1

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(SM:14-2979)

cc: Marian Abbett, TCP
Marv Coleman, TCP



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
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July 24, 2014

Sound Transit
Attn: Karin Ertl
401 South Jackson Street
Seattle, WA 98104

Re: Sound Transit 2014 Long-Range Plan Update Draft Supplemental EIS
Ecology SEPA 201402979

Dear Ms. Ertl:

Thank you for the opportunity to comment on Sound Transit's Long Range Plan Update Draft Supplemental EIS. This document focuses on how, when, and where mass transit should grow in the Sound Transit service area to support and respond to an estimated 30% growth in population by 2040. The Department of Ecology (Ecology) reviewed the draft plan and offers the following comments.

General

Ecology appreciates Sound Transit's commitment to reducing the environmental impacts of traffic to the State's air, water, and land, and supports the thorough analysis Sound Transit has undertaken to evaluate the impacts of various forms of mass transit.

Water Quality and Hydrology

WATER QUALITY

Anne Dettelbach, Northwest Regional Office (425) 649-7093
Bobb Nolan, PE, Northwest Regional Office (425) 649-7197
Ed O'Brien, PE, Headquarters (360) 407-6438

- Ecology considers any rail track to be a pollution-generating surface. This is true for light rail and commuter rail surfaces. Therefore, operating a rail system IS considered a pollutant generating activity.
- Specific potential sources of pollutants carried by stormwater runoff include:
 - Metals from track abrasion;
 - Metals from wheel abrasion;

543-1

Sound Transit is consulting with Ecology regarding the issue of whether the light rail trackway is a pollutant generating surface requiring stormwater treatment. Sound Transit's analysis of the environmental impacts of light rail has found that the light rail trackway is not a significant source of pollutants in surface and stormwater runoff. This analysis has been reviewed by regulatory agencies including U.S. Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA Fisheries), WSDOT, and local jurisdictions including Seattle, Tukwila, SeaTac and Bellevue. The resultant opinion of all reviewing agencies to date is that impervious surfaces used solely for light rail trackway are non-pollution generating.

Sound Transit concurs with the comments regarding perviousness of surfaces and stormwater control requirements.

543-1

Ms. Karin Ertl
 July 24, 2014
 Page 2

543-1

- Material from disk brakes;
- Material from lubrication and noise mitigation activities;
- Blow-in pollutants from surrounding pollution-generating surfaces (e.g., roads).

Ecology notes that some of these pollutants may require enhanced treatment.

- Ecology determines the 'perviousness' of a surface in the following manner:
 - If the track is at grade on ballast, the track and ballast are considered impervious surfaces. This is due to the heavily compacted underlying surface.
 - If the track is elevated, and stormwater runoff drips off the edges without collecting or concentrating, then the surface directly below the tracks determines whether it is impervious or not.
 - If the track is elevated, and the stormwater runoff collects into a conveyance system or concentrates by any other method, the surface is considered an impervious surface.
- New impervious surfaces will trigger flow control requirements if the applicable thresholds are exceeded. These thresholds are set forth in stormwater management manuals such as the Stormwater Management Manual for Western Washington (2012).
- In all cases, Sound Transit should confer with the jurisdictions through which its project travels to determine necessary stormwater control requirements (flow control or runoff treatment).

If you have questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above. Thank you for considering these comments from the Department of Ecology.



Alice Kelly
 Regional Planner
 Department of Ecology
 Northwest Regional Office

cc: Josh Baldi, NW Regional Director, Ecology
 Kevin Fitzpatrick, WQP, Ecology
 Raman Iyer, WQP, Ecology
 Anne Dettelbach, WQP, Ecology
 Bobb Nolan, PE, Ecology
 Ed O'Brien, PE, Ecology

Eastside Rail Corridor Regional Advisory Council

King County Courthouse
516 Third Avenue, Room 1200
Seattle, WA 98104

MEMBERS:

Dow Constantine
King County Executive

Jane Hague
King County Councilmember

Larry Phillips
King County Council Chair

Kathy Lambert
King County Councilmember

Amy Walen
Kirkland Mayor

John Marchione
Redmond Mayor

David Namura
Puget Sound Energy
Public Policy & Local
Government Affairs Manager

Joni Earl
Sound Transit Chief
Executive Officer

July 28, 2014

Mike Harbour
Acting Chief Executive Officer
Sound Transit
401 S. Jackson Street
Seattle, WA 98104-2826

Dear Mr. Harbour,

Thank you for the opportunity to comment on the Draft Supplementary Environmental Impact Statement (DSEIS) for Sound Transit's Long Range Plan (LRP) update. We recognize that the LRP is financially unconstrained and offers an opportunity to lay out a long-term vision for High Capacity Transit (HCT) in the Central Puget Sound region—a vision that will be refined over time as funding and other practical constraints are addressed.

As members of the Eastside Rail Corridor (ERC) Regional Advisory Council (RAC) and the holders of property interests along the railbanked ERC, we have developed and serve as stewards of a vision for the corridor as a multi-use "corridor for the ages" that could provide economic, mobility, and recreational benefits to the region for generations to come. We see great potential to align that vision with Sound Transit's long-term vision for high-capacity transit serving the region, as captured in your LRP.

Last October, the RAC members jointly published a report, *Creating Connections*, that outlines our shared vision and detailed work program for the ERC. You can find the report at www.kingcounty.gov/operations/erc-advisory-council.aspx. We appreciate the participation of Sound Transit CEO Joni Earl and staff in that process and look forward to continuing to partner with Sound Transit on achieving our vision.

The RAC envisions the railbanked ERC as a multi-use corridor including high-capacity transit, non-motorized trail use, and utility improvements. Therefore we strongly support the LRP's inclusion of HCT on the ERC. We look forward to working with Sound Transit to refine this vision and to develop a plan for the corridor that ensures multiple uses are well-integrated and that none of these envisioned uses of the ERC are precluded by any other.

The RAC report highlights the ERC's potential for connecting growing residential communities in the south and north to the expanding job centers

July 25, 2014
 Sound Transit LRP comment letter
 Eastside Rail Corridor Regional Advisory Council

such as Bellevue, Redmond, and Kirkland. We encourage Sound Transit to plan and build these connections as soon as possible, particularly the Sound Transit Board's identified extension to downtown Redmond along the Redmond Spur portion of the ERC.

456-1

Since the LRP is unconstrained in both time and cost, the DSEIS should include the full spectrum of Bus Rapid Transit and Street Car technology, including vehicles that are autonomous and/or those that are powered by electricity or other alternative fuel technologies. Given the speed of technological advancement, advanced high capacity transit modes such as maglev, aerial tram, and personal rapid transit should not be discounted and are in fact in service at both national and international locations. It could be that, over the life of the plan, one of the modes being excluded from consideration could help improve operations, reduce capital expenditures and do so with a small environmental footprint. The LRP should not exclude innovative/advanced transit modes from consideration along the full ERC.

456-2

RAC report Recommendation 4A notes the owners' "interest in ensuring that the [ERC] corridor study and the Long-Range Plan update encompass the entirety of the public right-of-way in the corridor, including the ERC and the I-405 corridor." Given the geographic constraints between the eastern shores of Lake Washington and I-405 and the region's funding constraints, we encourage Sound Transit to consider these parallel public right-of-ways together, rather than separately, to efficiently and cost-effectively provide multi-modal connections and faster commutes between the region's growing communities.

Thank you for your consideration of these issues.

Sincerely,



Jane Hague
 Co-Chair, Regional Advisory Council



Christie True
 Co-Chair, Regional Advisory Council



Larry Phillips
 King County Council Chair



Kathy Lambert
 King County Councilmember



Amy Walen
 Kirkland Mayor



David Namura
 Puget Sound Energy,
 Public Policy & Local Government
 Affairs Manager

456-1

Please see the response to common comment 21 - Alternative technologies - General in Section 5.3.4 of Chapter 5 of this Final SEIS.

456-2

As described in Sections 2.3 and 2.4 of the Final SEIS, several modes of service have been considered in the parallel I-405 and ERC corridors. The Board will review the projected ridership, efficiency, accessibility, and environmental resources within both corridors and across modes as a system in determining what projects will be included in the Long-Range Plan Update.



July 25, 2014

Attn: Karin Ertl
SOUND TRANSIT
410 S. Jackson St.
Seattle, WA 98104

Re: Long Range Plan Draft Supplemental Environmental Impact Statement (SEIS)

Dear Ms. Ertl:

Thank you for the opportunity to review Sound Transit's Long Range Plan Draft Supplemental Environmental Impact Statement (SEIS). We commend Sound Transit for evaluating a wide variety of modes and alignments, and we concur with the conclusion that the Action Alternative options, as presented at this regional plan level, do not result in significant unavoidable adverse impacts with the exception of some construction-phase impacts.

King County and Sound Transit recently approved motions directing staff to develop joint transit integration plans that make full use of the greater operating speeds, reliability and capacity of rail and RapidRide, putting savings into improving local service and regional connections. We encourage Sound Transit to develop integration plans with other agencies as well. These efforts will help identify projects with the greatest potential to increase ridership and reduce transportation-related greenhouse gas emissions which will help us get closer to reaching our regional and state climate change goals.

458-1 | As Sound Transit moves forward with its planning process, we encourage emphasizing equity and finding new ways to reach underserved populations through robust community engagement and services that meet the needs of an increasingly diverse region. We encourage continued access and efficiency improvements such as seamless transfers, real-time information, improved bicycle/pedestrian infrastructure, and multi-modal enhancements including para-transit for the elderly and people with disabilities.

458-2 | The Board's decisions should consider the importance of linking Sound Transit's system and stations to trails in the Regional Bike Network and the Regional Trails System including the Eastside Rail Corridor, Burke Gilman, Mountains to Sound, Lake to Sound, and SR 520 trail. Regional bike and trail connections vastly expand transportation choices while preserving environmental quality, promoting health, and providing a wide range of economic benefits when planned in concert with other transit modes. Use of the Eastside Rail Corridor for HCT should not preclude other trail uses.

458-1

Sound Transit will continue to emphasize equity and find ways to reach underserved populations. Specific measures to address access and efficiency improvements would be addressed in the future during project-level reviews for those projects that are ultimately implemented. Such measures would be in accordance with Sound Transit's policies and programs as applicable.

458-2

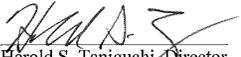
Sound Transit adopted a System Access Policy in 2013, Resolution No. R2013-03. Detailed alignment and station location and access decisions will be determined during future project-level reviews.

Karin Ertl
July 25, 2014
Page 2

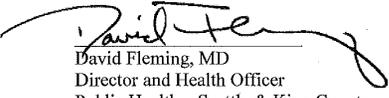
We look forward to working with you during development of the Final SEIS, LRP, and system plan, and we suggest meeting with King County Metro Transit's Strategic Planning and Analysis group. Please contact Peter Heffernan, Intergovernmental Relations, at peter.heffernan@kingcounty.gov or by phone at 206-477-3814 to coordinate planning efforts with the County as well as for additional information or clarification on any of these issues.

We hope our comments are helpful. We are committed to working with Sound Transit in pursuit of creative solutions to meet mobility goals.

Sincerely,


Harold S. Taniguchi, Director
King County Department of Transportation


Christy True, Director
King County Department of Natural Resources and Parks


David Fleming, MD
Director and Health Officer
Public Health - Seattle & King County

cc: Laurie Brown, Deputy Director, King County Department of Transportation (KCDOT)
Kevin Desmond, General Manager, Metro Transit Division, KCDOT
Peter Heffernan, Government Relations Administrator, KCDOT
Chris Arkills, Transportation Policy Advisor, King County Executive Office
Richard Krochalis, Regional Administrator, Federal Transit Administration
Michael Harbour, Sound Transit Chief Executive Officer



John Lovick
County Executive

Dave Somers
County Council Chair

3000 Rockefeller
Everett, WA 98201

July 25, 2014

Karin Ertl
Sound Transit
401 S Jackson St.
Seattle, WA 98104-2826

RE: Comments on the Regional Transit Long-Range Plan
Draft Supplemental Environmental Impact Statement (DSEIS)

Dear Ms Ertl:

Snohomish County appreciates this opportunity to comment on the DSEIS for Sound Transit's Regional Transit Long-Range Plan Update. In order for future expansion of the regional transit system in Snohomish County to adequately serve the needs of Snohomish County residents and business, we ask that you incorporate the following key elements in the plan update.

The Final Supplemental Environmental Impact Statement (Final SEIS) and Long-Range Plan Update must include and prioritize completion of a light rail network from Lynnwood to Everett. Inclusion and completion of light rail to Everett within the next system-level plan (ST3) is vital to meeting the growth targets identified for Snohomish County. Of the high capacity transit options considered in the SEIS, light rail will provide the ridership capacity necessary on the Lynnwood to Everett section of the regional transit spine.

The Final SEIS and Long-Range Plan update must include a high capacity transit (HCT) system serving the Paine Field Manufacturing and Industrial Center (MIC). HCT alternatives should include light rail and bus rapid transit. These alternatives should be considered along with Community Transit "Swift" Bus Rapid Transit system plans and Everett Transit plans in

416-1

The Draft SEIS evaluated a light rail corridor (corridor 15) that would specifically serve the Paine Field MIC as part of the Potential Plan Modifications Alternative. (Please note that the number of this corridor changed to corridor 13 in the Final SEIS, and the configuration changed slightly). In response to comments on the Draft SEIS, this same corridor was also evaluated for potential regional express bus service (corridor 47). Please see Figures 2-9 and 2-10 of the Final SEIS.

Because these corridors are a part of the Potential Plan Modifications Alternative, the Sound Transit Board would first have to modify the current Long-Range Plan in order to implement high capacity transit in these corridors in the future. The Long-Range Plan will be updated after issuance of the Final SEIS. In turn, the updated plan will support Sound Transit Board decisions about future high-capacity transit investments.

416-1

416-1

developing the next Sound Transit system-level plan (ST3). Both the Current Plan Alternative with light rail generally aligned along I-5 and Plan Modification Alternative No. 15 (per DSEIS) showing light rail via the Paine Field Manufacturing and Industrial Center should be included in the Final SEIS.

As in the Current (2005) Plan Alternative, the Final SEIS and Long-Range Plan update must support the Snohomish County GMA Comprehensive Plan by providing for light rail service to the urban centers at 164th St SW/I-5 and 128th St SW/I-5. Significant planning, infrastructure and land development improvements have taken place in these centers in preparation for light rail service. Connections with bus rapid transit, park & rides, cycling and pedestrians will occur at these centers.

Snohomish County looks forward to working with Sound Transit to complete the update to the Regional Transit Long-Range Plan and preparation of the next system-level plan.

Sincerely,



Dave Somers
County Council Chair



John Lovick
County Executive

Sound Transit Long-Range Plan Update - RECORD #439 DETAIL

Submission Date : 7/28/2014
First Name : Bobann
Last Name : Fogard
Submission Content : Thank you for the opportunity to review and comment on the Draft Supplemental Environmental Impact Statement for the Long Range Plan Update. The following technical comments from Snohomish County Public Works are submitted for your consideration as you move forward on the plan update.

- 439-1 | The BRT project on SR 99 from Seattle to Everett (the project is labeled throughout the DSEIS as "R") has been substantially implemented from Aurora Village to Everett station through CT's Swift BRT service, but the DSEIS includes it on the list of unimplemented projects in the Current Plan. It is very unlikely that ST provide a service that CT is already providing on the corridor. The SEIS should knowledge that this project has substantially been implemented, even though it is not in Sound Move or ST2. If an ST BRT system on SR 99 would not be a duplication of service, the SEIS should discuss how ST would do it differently or it should be removed from the Current Plan Alternative as already implemented.
- 439-2 | Figure 2-9 lists new light rail alignments in the Potential Plan Modification Alternative. The map appears to show project 15 – service to Paine Field – as following 164th St SW. On other maps, such as 4-3, 4-20, the alignment appears to be following 128th St SW/Airport Rd. ST's HCT studies for this corridor have discussed alignment on 128th St, but never on 164th. Figure 2-9 should be consistent with the other maps and the HCT studies and show the alignment generally following 128th St SW/Airport Rd.
- 439-3 | It is unclear why on page 2-33 Tulalip is listed as a "not reasonable location for extending HCT service", while Marysville, which is located nearby, is listed as a "a reasonable location for extending HCT service".
- 439-3 | On page 3-37 the King/Snohomish County Line West (screenline 6) description associates the increase in volumes on the screenline with the light rail extension between Tacoma and Federal Way (corridor H). Corridor H is light rail from Lynnwood to Everett not Tacoma to Federal Way which would make more sense for this screenline.
- 439-3 | Corridor H, light rail from Lynnwood to Everett, is listed on page 3-37 as a contributing corridor to screenline 1, the ship canal, but is not listed in the Corridor Effects on Transit Ridership Changes discussion for Corridor H on page 3-40. These should be consistent.
- 439-3 | The Corridor Effects on Transit Ridership Changes discussion for Corridor H on page 3-40 should mention Screenline 5, north of 526, which would logically be influenced by a rail line from Lynnwood to Everett.
- 439-4 | There should be a table associated with Figure 3-9 similar to how Table 3-10 is associated with Figure 3-8. This would provide more detailed information on how the Potential Plan Modification Alternative compares to ST2.
- 439-5 | In Table A-3, the "Chapter 4 map letters" in the first column are not associated with the correct projects
- Thank you,
- Bobann
Bobann Fogard, PE | Division Director
Transportation & Environmental Services Division
- [cid:image001.jpg@01CDBDBA.5D8052B0] Snohomish County
Department of Public Works
3000 Rockefeller Avenue M/S 607
Everett, Washington 98201

439-1

While BRT service in the SR 99 corridor has been substantially implemented by Community Transit, it remains an element of Sound Transit's Long Range Plan until removed by the Board. Therefore, implementation of such bus service remains an option within the Current Plan Alternative. However, as noted in the comment, it would largely be redundant with service now provided by Community Transit. The Board will review the analysis presented in the Final SEIS prior to updating the Long-Range Plan, which could include the identification of elements that should be removed from the current Long-Range Plan.

439-2

The Potential Plan Modifications corridor 13 - Lynnwood to Everett, serving Southwest Everett Industrial Center (Paine Field, Boeing), has been revised in Figure 2-9 of the Final SEIS.

439-3

The discussion of screenline 6 has been corrected in Section 3.4.1 of the Final SEIS. Updates have also been provided in Section 4.1.2 of the Transportation Technical Report (Appendix K of the Final SEIS).

With regard to the second item (page 3-40 of the Draft SEIS), Corridor H was listed as a contributing factor for screenline 1.

Also on page 3-40 of the Draft SEIS in the discussion of corridor H, number "9" that preceded "screen line 1" has been removed in Section 3.4.1 of the Final SEIS and Section 4.1.2 of the Transportation Technical Report (Appendix K of the Final SEIS).

Corridor H will contribute to ridership changes at screenline 5. Changes have been made and included in Section 3.4.1 of the Final SEIS. Updates have also been provided in Section 4.1.2 of the Transportation Technical Report (Appendix K of the Final SEIS).

439-4

The transportation analysis for the SEIS focuses on two major topics - 1) the assessment of the Current Plan Alternative when compared to Sound Transit 2 (ST2) and 2) the assessment of the Potential Plan Modifications Alternative when compared to the Current Plan Alternative. The results are included in Chapter 3 of the Final SEIS.

Chapter 3 of the Final SEIS also includes a presentation of results comparing the Potential Plan Modifications Alternative with ST2; Figure 3-9 referenced in your comment shows ridership changes at screenlines. This comparison between the Potential Plan Modifications Alternative and ST2 is intended to provide a high-level description of potential effects of a major high-capacity transit expansion, and the numbers presented in this figure are effectively the summation of the differences presented in Tables 3-8 and 3-10.

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439-4

Accordingly, the ST2/Potential Plan Modifications comparison did not warrant the more extensive analysis presented in the SEIS for the ST2/Current Plan and the Current Plan/Potential Plan Modifications comparisons.

439-5

Table A-3 has been revised in the Final SEIS to match the Final SEIS corridor designations.



July 28, 2014

Sound Transit

Attention: Karin Ertl, Long Range Plan Draft SEIS

Union Station

401 S. Jackson Street

Seattle, WA. 98104

Dear Ms. Ertl,

Thank you for the opportunity for the Port of Seattle to provide comments on the Regional Transit Long Range Plan SEIS. The Port has been following the Plan Update as a member of the Interagency Coordination Group and provided scoping comments on November 25, 2013. The Port's two main hopes from the plan update are that the regional transit system continues to gain ridership, thus reducing traffic congestion on key freight routes, and that the existing industrial freight routes in the city's Manufacturing and Industrial Centers (MICs) and near the Sea-Tac International Airport (STIA) are not compromised by improved transit systems that may slow freight movement. While the Port supports all five goals of the Long Range Plan, we especially relate to your goal of "improve the economic vitality of the region," and "enhance the region's ability to move goods." We believe having a vital economy relies on the ability to efficiently move goods as well as people.

SEIS Alternatives: The SEIS Alternatives, the Current Plan Alternative and the Plan Modification Alternative, are straightforward. The bottom line conclusion is that the Current Plan Alternative attracts increased ridership with overall lower transit times compared with the 2005 ST2 Plan, and that the Plan Modification Alternative attracts increased ridership with lower transit times when compared to the Current Plan Alternative. Overall, the Plan Modification Alternative results in reduced transit times between Downtown Seattle to Everett and from Downtown Seattle to Tacoma. The light rail alternative from downtown Seattle to the City of Sea Tac in the Plan Modified Alternative provides much quicker service and a higher ridership compared to both the Current Plan and the ST2 Plan.

As called out on page S-17 (Freight movement), both Plan Alternatives benefit freight movement due to an overall reduced VMT; however, new transit infrastructure in both Plans may well interfere with goods movement delivery at unspecified locations.

445-1

Freight Mobility: Maintaining and improving freight mobility in the region, especially near Port facilities in Seattle and at the STIA, is the major focus of the Port in regard to the Sound Transit's Long Range Plan SEIS. The Port is a strong proponent of transit facilities and services and appreciates the freight benefits that are realized when people choose transit over driving. However, we recognize that there will be trade-offs when increased Link light rail trains, commuter trains, and bus service create conflicts in areas of heavy freight movement. Oftentimes, transit is benefited by high levels of traffic congestion. People may choose to take transit when traffic congestion is heavy. However, goods movement can't use transit to move. High levels of traffic congestion and the resulting slow speeds of freight movement create a serious competitive issue as we strive to move freight faster and more efficiently than competing ports. The Port and the City of Seattle have made billions of dollars in port terminal facilities and transportation infrastructure investments in the last decade and would like to see these facilities operate efficiently for the community's economic benefit.

445-2

Seattle Industrial Areas: The Duwamish Manufacturing Industrial Center and the Ballard/Interbay North End Manufacturing Industrial Center (BINMIC) are two Seattle Manufacturing Industrial Centers identified in the Puget Sound Regional Council's Long Range Land Use Plan (Vision 2040). The Duwamish MIC currently has about 75,000 jobs and is expected to grow to 107,000 by 2040. The BINMIC currently has 33,000 jobs and is expected to grow to 54,000 by 2040. About 60% of these existing jobs are classified as industrial jobs.

To maintain these jobs, often considered to be family-wage jobs and not requiring a college education, the land use needs to stay consistent to protect industrial land from gentrification. In the SEIS analysis of Cumulative Impacts under Land Use (4.13.9), the Port would like Sound Transit to include some discussion on the potential impact that high capacity transit stops in the MIC's might have on current land-use. The Port is concerned that the expected development that occurs at high capacity transit stops might have major impacts on the MICs.

445-3

Link Light Rail: The Port generally supports any additions to the Link Light Rail System; however, we do have concerns in certain areas where implementation both during construction

445-1

Sound Transit recognizes the importance of freight mobility in the region and in particular those near Port facilities. This FSEIS is a plan-level, rather than project-level EIS. Accordingly alternatives are defined and evaluated broadly. More detailed project-specific analysis would occur in the future for those projects that are implemented as part of a future system plan. That future analysis would include further evaluation of potential freight impacts at specific locations, as well as the identification of potential avoidance or mitigation measures.

445-2

Section 4.9 has been revised to include a discussion on how new high capacity transit stations would potentially affect land use in the Ballard/Interbay North End and Duwamish MICs.

445-3

The Port's concerns about conflicts with major truck corridors are noted. Specific alignments and guideway configurations have not yet been identified for potential HCT corridors. This FSEIS is a plan-level, rather than project-level EIS. Accordingly alternatives are defined and evaluated broadly. More detailed project-specific analysis would occur in the future for those projects that are implemented as part of a future system plan. That future analysis would include further evaluation of potential freight impacts, as well as the identification of potential avoidance or mitigation measures. The Port and other stakeholders will have additional opportunities to comment on any such project-specific analyses that may be completed in the future.

445-3

and when complete will conflict with major freight corridors. The four routes that are most concerning are the Downtown Seattle to Magnolia/Ballard, Bothell via Northgate routes (Project number 1 and 11), the Downtown Seattle to West Seattle/Burien (Project number 2), and the Tukwila to SODO via Duwamish industrial area (Project #9). These four routes all are located in the heart of the Duwamish MIC and BINMIC and could have a major impacts on the movement of goods from Port marine terminals and facilities. There is heavy truck movement in these locations in conflict with other transportation modes. We continue to believe that freight movement should have priority on designated major truck streets in the Manufacturing Industrial Centers in the City of Seattle. Key roadways which are major truck streets that are critical to freight movement include 15th Avenue W/Elliott Avenue/Holman Road, East Marginal Wy S, 1st Avenue S and 4th Avenue S.

Currently, 15th Avenue West/Elliott Avenue W (light rail Route 1) between Seattle and Ballard has the Rapid Ride Service with a lane dedicated in each direction during peak hours to bus service. This has greatly improved transit service but has reduced vehicular mobility, including trucks trying to get to Terminal 91 and to the industrial lands in and adjacent to Ballard. The Port also has concern with the level of development that is normally desired adjacent to stations along a light rail line (or other high capacity transit lines). Dense residential and commercial development along stations attracts high levels of vehicle, pedestrian and bicycle traffic which can create safety conflicts and travel delays for freight. The incompatibility of freight and goods movement with residential and people-centered development creates conflicts between new development and established industry. The Port would like to reduce these conflicts where possible. In addition, Route 11 continues north from Ballard along Holman Road towards Northgate. Holman road is a key truck street carrying traffic from industrial Ballard to I-5. Major transit development could negatively impact freight movement along this corridor.

445-4

Light Rail Alternative 2 (Downtown Seattle to West Seattle/Burien) appears to be a strong alternative that has the potential to carry a high volume of riders with reduced transit times. Sound Transit analysis identified the improvement as effective as it increased daily ridership by 20,000 and reduces travel time between the Seattle CBD and STIA by 22%. The Port would still have concerns for stations in the Duwamish before the route heads west to West Seattle, and the development that stations would likely attract. However, it seems likely that light rail or a high capacity alternative could greatly reduce auto trips between West Seattle and downtown Seattle, thus freeing up the congested roadway system for freight movement. In addition, this link light rail connection would also create a new connection to Burien and the STIA.

Of greatest concern to the Port is Alternative #9 (Tukwila to SODO via Duwamish industrial area). This corridor represents one of the densest industrial centers in Washington State. We

445-4

The Port's concerns about stations in the Duwamish are noted. This FSEIS is a plan-level, rather than project-level EIS. Accordingly alternatives are defined and evaluated broadly. More detailed project-specific analysis would occur in the future for those projects that are implemented as part of a future system plan. That future project-specific analysis would include further evaluation of potential freight impacts, as well as the identification of potential avoidance or mitigation measures.

are very concerned that the implementation of a light rail corridor with stations through SODO would create opportunities for new residential and commercial development. From a Port perspective, it makes more sense to focus on light rail improvements on the existing light rail line between downtown Seattle to STIA. In addition, Sound Transit should prioritize opportunities further west in the denser residential/commercial areas of West Seattle, ultimately connecting downtown Seattle, West Seattle, Burien and beyond.

Souder Commuter Rail: The Potential Plan Modification Alternative includes three commuter rail improvements in Pierce County which bring feeder service into the existing Commuter Rail system. The Port generally supports improvements that will improve commuter service and increase ridership.

In our scoping letter, the Port requested that Sound Transit look at the potential of creating a transit connection between the Tukwila Souder Station and STIA. The Potential Plan Modifications Alternative includes Alternative #19 that would provide a yet to be determined mode of service between the Tukwila Souder Station and STIA. The route proposes a loop between the Tukwila Souder Station to Downtown Seattle via STIA, Burien and West Seattle. The Port supports inclusion of this alternative for further analysis. In addition, the Plan Modification Alternative includes Regional Express bus/BRT Alternative 35 which provides a connection between Kent, and presumably the Kent Souder Station, and STIA. This would also provide a direct connection for air travelers and employees between the Souder station and STIA.

Regional Express Bus/Bus Rapid Transit: The Port of Seattle is a strong proponent for the extension of Regional Express Bus and Bus Rapid Transit (BRT). In the Current Plan Alternative, Route W provides improved access from West Seattle to STIA. In the Modified Plan Alternative, Routes # 34 (Tacoma to Bellevue), #35 (Kent to STIA) and #36 (Puyallup to Rainier Valley) all propose service improvements to or near STIA. The Port strongly supports projects that provide airport customers and employees with alternative ways of getting to and from STIA.

Freight Mitigation: Since the SEIS is a plan-level environmental analysis, it is difficult to be specific about potential freight impacts or mitigation. On page S-25, the plan describes potential Transportation Mitigation as “required to address impacts to local transit service, local roadway and freeway facilities, parking, safety, non-motorized facilities in station areas, and freight movement resulting from plan implementation and project development. The true impacts and mitigation on freight mobility won’t be known until there is a project level environmental analysis. However, the Port would like to emphasize that Sound Transit should prioritize future Sound Transit facilities that minimize their impact on freight movement when possible.

Section 3.8 describes Potential Transportation Mitigation Measures, including for freight movement. The SEIS also addresses Transportation Construction Mitigation in Section 3.8.2. The port is pleased to see this section as it will be necessary to address the impact of new Sound Transit facilities on freight mobility as the project impacts become known. Again, the Port hopes that Sound Transit will seriously consider impacts on freight movement when selecting project alternatives.

Again, thank you for the opportunity for the Port to comment on the Sound Transit Long Range Plan SEIS, and for being a partner

Sincerely,



Dan Burke

Program Lead Planner

Public Affairs Division

Port of Seattle



July 28, 2014

Sound Transit
 Karen Ertl, Long Range Plan Draft SEIS
 LongRangePlan@soundtransit.org
 Union Station
 401 S Jackson Street
 Seattle WA 98104

Dear Ms. Ertl,

The Puget Sound Regional Council appreciates the opportunity to comment on the *Regional Transit Long-Range Plan Update Draft Supplemental Environmental Impact Statement*.

The success of the Sound Transit Long-Range Plan is integral to creating a sustainable and equitable future for the central Puget Sound region. To this end, the Long-Range Plan and VISION 2040 – the regional growth, economic and transportation plan, adopted under the state Growth Management Act – are mutually dependent and supportive. Regional plans for land use, transportation and economic development cannot succeed without critical Sound Transit investments; and success of those investments depends on the successful implementation of those regional plans.

We applaud Sound Transit for taking this comprehensive step now to update the plan and lay the groundwork to finance future system development. We recognize that the Long-Range Plan is a high-level unconstrained plan that does not establish priorities, specific alignments or phasing, and that subsequent system and project development plans will contain finer-grained analysis of the benefits and impacts of future specific transit investments. As the basis for those subsequent plans, however, the Long-Range Plan sets the overarching vision and goals and objectives that will be used to select which projects move into the System Development Plan and future ballot measures.

Accordingly, the Long-Range Plan should provide clear objectives, based on key issues, to support future project selection. Since the adoption of the 2005 Sound Transit Long-Range Plan, many emerging issues point to the importance of a regional high-capacity transit (HCT) network, including:

- An updated regional plan – VISION 2040 – that includes a numeric Regional Growth Strategy that guides local comprehensive planning;
- Increased understanding of climate change impacts highlights need for VMT and GHG reduction;
- New data on regional social disparities and insufficient affordable housing emphasize transit's critical role in improving access for transit-dependent populations, promoting social equity, and decreasing household transportation expenses;
- Budget uncertainties for local transit agencies underscore the importance of achieving funded regional transit investments; and

- Transit investments provide key leveraging opportunities to help bend the trend on regional growth in urban areas.

These issues, together with Sound Transit's endorsement of the Growing Transit Communities Strategy and Regional Compact, call for a bold and visionary Long-Range Plan that will lay the foundation for region-wide HCT expansion.

The Draft Supplemental Environmental Impact Statement (DSEIS) is an important first step in that process and we provide the following comments, some of which reiterate our November 25, 2013 letter which responded to the Determination of Significance and Scoping Notice.

Comments in Response to the DSEIS

We commend Sound Transit for including a comprehensive set of corridors and transit modes for analysis and potential inclusion in the Long-Range Plan. In particular, we appreciate that the Potential Plan Modifications Alternative creates a more complete network of HCT services that broadly support the regional vision for compact and sustainable development and specifically connect more of the regionally designated centers. The DSEIS is a strong body of work that will help to make the Long-Range Plan Update more effective in setting the stage for any future initiatives to finance HCT expansion in the region.

1.4 Goals and objectives. The updated goals and objectives for the Long-Range Plan on page 1-5 of the DSEIS do a good job of placing this document within the context of implementing regional and local transportation and mobility goals and we appreciate the direct linkage to VISION 2040 with references to connecting regional centers. The Regional Growth Strategy contained in VISION 2040 sets numeric population and employment goals for counties and regional geographies and provides guidance for local planning under the Growth Management Act and serves as a framework for developing local growth targets that are consistent with VISION 2040. The goals and objectives could make it clearer that the Long-Range Plan plays a key role in supporting population and employment growth levels adopted under the Regional Growth Strategy and through locally-adopted targets. *We recommend that the following objective be added to the first goal in the table on page 1-5:*

“ • Align Sound Transit investments and implementation to support population and employment growth at levels consistent with VISION 2040's Regional Growth Strategy and locally adopted growth targets under the Growth Management Act.”

Currently the goals and objectives language is silent on issues of social equity and support for transit-dependent populations. VISION 2040's overarching goal states that “Land use, economic, and transportation decisions will be integrated in a manner that supports a healthy environment, addresses global climate change, achieves social equity, and is attentive to the needs of future generations” (emphasis added). *We recommend that the following objective be added under the first goal in the table on page 1-5 to emphasize the important role that transit investments have in promoting social equity and serving the needs of transit-dependent and other underserved populations in the region:*

“ • Improve access and options for transit-dependent and other underserved populations through public transportation services.”

452-1

Section 1.4 has been revised in the Final SEIS to clarify how the current 2005 goals and objectives may be modified during the Long-Range Plan update process. First, this section now also includes the goals and objectives as presented in the current 2005 Long-Range Plan. Second, the title of the goals and objectives shown in the Draft SEIS has been changed to "Revised Goals and Objectives for Consideration". They are intended to provide examples of potential revisions to the 2005 goals and objectives. The Sound Transit Board will consider whether to make any of these or other revisions to the 2005 goals and objectives in the updated Long-Range Plan. In response to PSRC's comment, these revised goals and objectives have been modified in the Final SEIS to include objectives to plan and implement HCT services consistent with PSRC's long-range growth management, environmental, economic, and transportation strategy; and to consider transit-dependent, low-income, and minority populations.

452-1

452-2

The Final SEIS has been revised accordingly.

452-2

1.5.1 Consistency with local and regional plans. This section of the DSEIS is a critical opportunity to enumerate the many regional and local plans which system planning should support. Because so many of these plans have changed since the last Long-Range Plan update, we ask that the section be updated to accurately describe these plans. *We recommend the following edits, in strikethrough format, for this section:*

Section 1.5.1:

The greater Puget Sound metropolitan area, which encompasses urbanized Snohomish, King, Kitsap, and Pierce Counties, has a coordinated series of regional, county, and local plans and policies that guide how the region manages its growth. The primary plans at the regional metropolitan level are PSRC's VISION 2040 (PSRC ~~2008 2009~~) and Transportation 2040 (PSRC ~~2010, updated~~ 2014). These plans share land use, growth management, and transportation policies that call for an effective regional transit system to link the regional urban growth and employment centers where much of the region's future growth will be focused. County and city comprehensive plan policies throughout the region reinforce the need for HCT investments to support new and continued population and employment growth, as well as to provide for vibrant urban communities that offer alternatives to travel via the automobile.

Since the 2005 Long-Range Plan Update, the regional land use plan ~~Vision~~ VISION 2040 and the regional transportation plan Transportation 2040 have been updated by the PSRC, the region's federally recognized metropolitan planning organization. As a regional sustainability plan, VISION 2040 now provides direction for integrated regional decision-making based on the triple bottom line of people, prosperity, and planet.

VISION 2040 has moved from a more conceptual plan to a clear and geographically-specific Regional Growth Strategy based on forecasted population and employment. The Strategy divides the region into seven distinct "regional geographies" based on the desired role for each type of jurisdiction in planning for future growth. Metropolitan and Core Cities, for example, are the locations for the majority of the population and job growth, with a "significant share" of that growth concentrated in regionally designated centers.

The structure of multicounty planning policies has been revised to include goals, policies, actions, and measures. Environmental policies have been expanded to address habitat, water and air quality, and climate change. In addition, transportation policies now place a greater emphasis on increased safety; more choices; better mobility through improved transit, ferries, and roads; transportation pricing; and mitigation of environmental impacts, particularly greenhouse gas emissions.

VISION 2040 calls for continued expansion of the regional transportation system to meet increased transportation demand associated with forecasted growth accommodated consistent with the Regional Growth Strategy. For example, as a functional plan implementing VISION 2040, Transportation 2040's programs and projects assume a doubling of transit during peak hours and a more than 80-percent increase during off-peak hours (PSRC 2010a).

The Growing Transit Communities Strategy was developed in 2013 to address key challenges to implementing VISION 2040 by identifying key strategies to accommodate growth near transit, provide affordable housing choices, and improve equitable access to opportunity.

452-2

Transportation 2040 recognizes the Growing Transit Communities Strategy framework to implement the Regional Growth Strategy through region-wide action and collaboration to promote thriving and equitable transit communities. As a signatory to the Growing Transit Communities Regional Compact, Sound Transit has joined the Puget Sound Regional Council and over 30 local jurisdictions and regional partners to work toward the broad goals of the Strategy and implement its many identified strategies and actions.

~~In addition, Finally,~~ since 2005, local jurisdictions (cities and counties) have amended their comprehensive plans to ensure consistency with regional plans and with the state's Growth Management Act requirements, as well as to accommodate increasing population and travel demand. Sound Transit's Long-Range Plan Update will help support these plans.

Last paragraph of Section 1.5.2:

Consistent with VISION 2040, most of this growth is expected to occur in cities and other urbanized areas, with only 18 percent projected planned for urban unincorporated areas as a whole and 7% outside the designated Urban Growth Area (PSRC 2013d). Because the Plan area is almost entirely within UGA, most of the region's growth projected in unincorporated areas would not occur within the Plan area. The Long-Range Plan will be updated as needed to address appropriate HCT service to support the anticipated amount, type, and locations of growth forecast for the region, called for in the Regional Growth Strategy, and planned locally for each of the regional growth centers.

Appendix J: Environmental Justice Study. As noted above, support for social equity and environmental justice should be among the primary objectives of the Long-Range Plan Update. We recognize and commend Sound Transit for including an appendix reporting the results of an environmental justice study. As Sound Transit moves forward to developing its next system plan, the agency should consider the application of some more robust environmental justice analysis methods utilized in the development of Transportation 2040 and the Growing Transportation Communities Strategy.

452-3

- ***Greater geographic detail to provide a more comprehensive analysis of benefits and impacts.*** As currently written, the environmental justice study considers characteristics of affected populations across the service area as a whole, rather than in specific areas. A range of potential positive and negative impacts should be considered at the scale of smaller areas, such as Census tracts, in order to address questions about the distribution of benefits and impacts among geographic, racial, and economic groups. Appendix G of Transportation 2040 (2010) is one example of a more disaggregated analysis of environmental justice impacts. The Fair Housing Equity Assessment (PSRC and Fair Housing Center of Washington, 2014) also provides useful data and analysis on the geography of social justice in the region.

In addition, as highlighted in the Growing Transit Communities Strategy, there are a range of impacts of transit system development for surrounding communities. Many are positive, although there can be negative impacts as well. One tool that can be used to gauge the benefits of greater connectivity to local communities is described in the report Equity, Opportunity, and Sustainability (Kirwan Institute and PSRC, 2012).

- ***Opportunity Mapping analysis, specifically in assessing environmental justice impacts and generally in system planning and implementation.***

452-3

Figures 1-1 and 1-2 in Appendix J of the Final SEIS are based on Census tract data and depict the distribution of minority and low-income individuals within the Sound Transit district boundary. A more disaggregated analysis of impacts and benefits to those populations, such as by Census tracts, would occur during project-level reviews in the future for those corridors that are ultimately implemented as part a system plan.

Technical Comments

In addition to our more substantive comments above, PSRC staff offers the following technical comments on the DSEIS:

- 452-4
- Page 1-6 incorrectly cites VISION 2040 adoption as 2009. The correct year is 2008.
- 452-5
- PSRC recommends that Sound Transit replace the second sentence in the third paragraph under *Support facilities* on page 3-9 with the following sentence: “These HOV designations are assumed to continue in the future until the limited access highway network becomes tolled, as assumed in PSRC’s *Transportation 2040* plan.”
- 452-6
- Page 4-20 references that VMT in the region “has increased from 30 million in 1981 to 80 million in 2009 (PSRC 2010).” The correct number and year, per the Transportation 2040 Final Environmental Impact Statement is 36 million and 1980.
- 452-7
- Table 4-2 incorrectly references all values as being in tons per day when the PM_{2.5} and NO_x values should be represented as pounds per day.
- 452-8
- PSRC requests that Sound Transit provide additional clarification to the reference on page 4-23 regarding the FHWA citation that presumes a 102% increase in vehicle miles traveled.
- 452-9
- In addition, page 4-23 makes reference to the EPA’s “Mobile Vehicle Emission Simulator” when it should read “Motor Vehicle Emission Simulator.”
- 452-10
- PSRC requests additional clarification regarding the following sentence on page 4-24: “Even with a roughly 25 percent increase in overall transportation vehicle miles traveled for all alternatives in 2040 compared to existing conditions, greenhouse gas emissions are expected to increase by only three to four percent between 2011 and 2040 as a result of improved fuel efficiency and future emissions standards.” What is the source of the reference to a 25% increase in vehicle miles traveled by 2040? In addition, how were the vehicle miles traveled figures referenced here related to the alternatives analysis calculated?
- 452-11
- Page 4-28 references only regional conformity requirements. PSRC would like to note, and recommends that the DSEIS does as well, that project-level conformity will be required at the point of project-level environmental documentation, which is the responsibility of the project sponsor, not PSRC.
- 452-12
- In Appendix F, page F-2 refers to VISION 2040 being adopted in 2009. It was adopted in 2008. On page F-3, Transportation 2040 is said to be adopted in May 2010. It should read: adopted in May 2010 and updated in May 2014. Further on F-3, the total dollar amount for unprogrammed projects in Transportation 2040 is accurately stated as \$211 billion, but we feel it would be more appropriate to state the constrained plan amount of \$173.6 billion.
- 452-13
- In Appendix K, section 3.4 (Non-motorized transportation), Sound Transit should reference the Active Transportation Plan, which was adopted as part of the Transportation 2040 update and also includes an updated typology of non-motorized facilities.

452-4

The date of adoption has been changed to 2008 in the Final SEIS.

452-5

The SEIS text has been modified as suggested and is included in Section 3.3.1 of the Final SEIS and in Section 3.1.1 of the Transportation Technical Report (Appendix K of the Final SEIS).

452-6

The Final SEIS has been revised accordingly.

452-7

The values in Table 4-2 of the Final SEIS have been changed to pounds per day.

452-8

As cited in the Final SEIS, the FHWA 2012 *Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA* states that “Based on an FHWA analysis using EPA’s MOVES2010b model, as shown in Figure 1, even if vehicle-miles travelled (VMT) increases by 102 percent as assumed from 2010 to 2050, a combined reduction of 83 percent in the total annual emissions for the priority MSAT is projected for the same time period.”

452-9

The text in the Final SEIS was corrected to read “Motor Vehicle Emission Simulator”.

452-10

Table 4-3 in the Final SEIS shows the vehicle miles traveled in 2011 and 2040. The vehicle miles traveled were calculated as part of the transportation analysis using the regional travel forecasting model.

With regard to use of the VMT information, the analysis of alternatives identified in Chapter 3 Transportation involved comparisons of potential effects for year 2040 and did not include comparisons with existing conditions.

452-11

The Final SEIS has been revised to clarify that Sound Transit will complete project-level conformity determinations in the future for individual projects that are ultimately implemented.

452-12

Appendix F in the Final SEIS has been revised accordingly.

452-13

Reference to the Active Transportation Plan has been added to Section 3.4 in Appendix K of the Final SEIS and to Section 3.5.5 of the Final SEIS.

Looking Toward Future System Planning

The updated Long-Range Plan is the basis from which projects will be selected for a system plan that could be considered at a future ballot initiative. Unlike previous system planning under Sound Move and ST2, in which investments were largely predetermined by the statutory direction to build the HCT "spine" for the region, a future system plan will likely be in a new position to select from many additional corridors proposed by the DSEIS Potential Plan Modifications Alternative.

As Sound Transit moves forward with the development of the next system plan, we look forward to working with you on selection criteria that reflect VISION 2040 and other regional policy during public comment and as we mutually prepare for the development of PSRC's Conformity Report (per RCW 81.104.080 and 81.104.090).

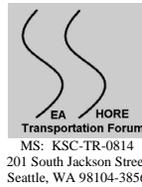
Thank you for your consideration of our letter. If you have any questions or comments, please contact me at (206) 464-7549 or imiller@psrc.org.

Sincerely,



Ivan W. Miller
SEPA Responsible Official
Puget Sound Regional Council

cc: Charlie Howard, PSRC



Phone: (206) 477-3812 Fax: (206) 684-2111

July 28, 2014

Sound Transit
Attn: Ms. Karin Ertl
401 S. Jackson St
Seattle, WA 98104

Dear Ms. Ertl:

On behalf of the SeaShore Transportation Forum (SeaShore), we would like to take this opportunity to provide Sound Transit with our comments in response to the Draft Supplemental Environmental Impact Statement for Sound Transit's Long-Range Plan (LRP) update. SeaShore consists of three core cities, Seattle, Lake Forest Park, and Shoreline, and King County, as well as several non-core cities on SR 522 (Kenmore, Woodinville, and Bothell) and in Southwest Snohomish County (Edmonds and Mountlake Terrace), and Snohomish County. For this reason, we represent the voice of municipalities in the northwest area of King County and southwest Snohomish County. This letter includes input from all three core cities and King County. In addition, we received and incorporated comments from several non-core cities and Snohomish County.

SeaShore continues to recognize the SR 522/SR 523 and SR 99 Corridors as high priority corridors for the regional transportation system. The completion of the regional Link light rail station at 145th Street (SR 523) will draw residents not only from the City of Shoreline, where it is located, but also from cities located along the SR 522 corridor including north Seattle, Lake Forest Park, Kenmore, and Bothell. Since 145th Street is already very congested during peak periods and additional traffic traveling to and from the light rail station will worsen this condition, the SeaShore Transportation Forum acknowledges this as an additional priority corridor that needs additional evaluation.

453-1

SeaShore appreciates that Sound Transit incorporated many of our scoping comments and suggested projects, policies, programs, and system-wide services as either new corridors or representative projects in the Potential Plan Modifications; or that they will be retained through the Current Plan. SeaShore supports retaining the projects, system-wide policies, programs, and services identified in the Current Plan. SeaShore also supports including the following projects and policies identified in the Potential Plan Modifications as part of the LRP update, with some modifications.

453-1

Please note that the corridor names and numbers have been modified in the Final SEIS. See Table 2-5 in Chapter 2 for a listing of the changes.

453-1

POTENTIAL PLAN MODIFICATIONS - Projects	
MODE	PROJECT
Light Rail	Downtown Seattle to Magnolia/Ballard to Shoreline Community College (Corridor #1)
Light Rail	Ballard to Everett Station via Aurora Village, Lynnwood (Corridor #3)
Light Rail	North Kirkland or UW Bothell to Northgate via SR 522 (Corridor #10)
Light Rail	Ballard to Bothell via Northgate (Corridor #11)
HCT Service (Light Rail or BRT)	Downtown Seattle to Edmonds via Ballard, Shoreline Community College (Corridor #20)
Regional Express Bus	UW Bothell to Sammamish via Redmond (Corridor #26)
Regional Express Bus	145 th Street from I-5 serving SR 522 (Corridor #29)
Regional Express Bus	Woodinville to Bellevue (Corridor #31)
Regional Express Bus	Woodinville to Everett (Corridor #32)
Bus	Improved east-west service in Shoreline connecting SR 99 BRT, I-5 LRT and SR 522 HCT (representative project)
Bus	Improve NE 145 th Street, including multimodal/bus priority treatments (e.g. BAT Lanes) (representative project)
Streetcar	Alderwood Mall to Edmonds Community College via Lynnwood Transit Center
POTENTIAL PLAN MODIFICATIONS – System-wide Policies, Programs and Services	
PROGRAM ELEMENT	NAME
BRT	Study integration of Swift with Link LRT to maximize the transportation benefit of both modes
BRT	Support BRT programs of other agencies, with goal of ITDP Bronze BRT standard
Transit Oriented Development	Support implementation of the Growing Transit Communities partnership
Transit Oriented Development	Financially support construction of transit-oriented development

SeaShore requests the following revisions to the Potential Plan Modifications:

453-2

1. The SeaShore Transportation Forum supports light rail as the preferred high-capacity transit (HCT) mode on SR 522, but would like to see bus-rapid transit (BRT) improvements and service on this roadway until light rail service begins.
2. The Draft SEIS assumes that additional regional express bus/BRT service, including service on 145th Street and SR 522, will operate on existing roadways, similar to current bus service and thus, improvements to these corridors would have little to no potential to generate environmental impacts. Given the need to improve pedestrian access and transit speed and reliability along these corridors, some degree of widening will be needed. The updated LRP needs to acknowledge the potential for widening of these corridors and assess the environmental impacts at the plan level. The updated LRP should also acknowledge jurisdictional planning efforts for improvements along these corridors and state that Sound Transit investments will be consistent with the approved plans.

453-2

Sound Transit will continue to participate in the City of Shoreline’s RDP process including the potential for widening 145th Street. The Final SEIS evaluates Corridor #40 (previously numbered #29 in the Draft SEIS) as a potential regional express bus corridor which assumes operation on existing roadways. It does not evaluate it as a bus rapid transit route with buses operating within exclusive rights-of-way that could require the addition of a bus-only travel lane. Section 4.9 of the Final SEIS has been modified to note that any improvements on 145th Street would be consistent with the City of Shoreline’s RDP for 145th Street. The section has also been revised to state that, in the event 145th Street is widened to accommodate buses, the impacts to adjacent land uses would be similar to those impacts described for bus rapid transit in other corridors which have dense development close to the roadway. Along those corridors, impacts to residential, commercial, or other land uses could occur.

- 453-3 | 3. Corridor improvements on 145th Street (SR 523) should extend from Aurora Avenue N (SR 99) to Bothell Way NE (SR 522) and include the I-5 interchange. These should include transit speed and reliability enhancements as well as improvements to pedestrian and bicycle access along the corridor and across the interchange to the light rail station. The specific types of improvements will be identified as part of the City of Shoreline's Route Development Plan (RDP) for this corridor and the LRP projects should be amended to state that improvements will be consistent with the City of Shoreline's RDP for 145th Street.
- 453-4 | 4. Please include Shoreline Community College as part of the route described in Corridor #3.
- 453-5 | 5. Please include the 130th Street Link Station in the Long-Range Plan, as it is currently a deferred or future station.

The SeaShore Transportation Forum would also like to see the following additional projects included in the updated LRP:

- 453-6 | 1. Improved east-west HCT service in Shoreline that connects SR 99 BRT, I-5 light-rail transit, and SR 522 HCT, or provides other essential east-west service. Representative projects include service from Shoreline Community College to the NE 145th Street light rail station, Lake City Way, and Bothell; and service from Richmond Beach to the light rail station at NE 185th Street, North City, and Lake Forest Park.
- 453-7 | 2. A separated bicycle/pedestrian bridge in the vicinity of 145th Street, consistent with the City of Shoreline's RDP. Non-motorized crossing of I-5 will be evaluated as part of the City's RDP process, in coordination with the City's light rail station area land use planning efforts, and Sound Transit should accept a role and respond to this need, as this will be vital in delivering riders to the 145th Street light rail station.
- 453-8 | 3. Addition of a park-and-ride development project within the City of Lake Forest Park to improve access to the SR 522/SR 523 HCT service. Due to terrain, Lake Forest Park has no effective internal transit service and must rely on a corridor access point. A park-and-ride would provide needed HCT access to the community.
- 453-9 | 4. If a new station is to be built in Snohomish County on 220th St SE, please include bus service from Edmonds to that station.

Thank you for your consideration of our scoping comments. We look forward to working with Sound Transit on the Long Range Plan update. Feel free to contact either of us if you have any questions.

Sincerely,



Chris Eggen
Deputy Mayor, Shoreline
Co-Chair
SeaShore Transportation Forum



Jeff Johnson
Councilmember, Lake Forest Park
Co-Chair
SeaShore Transportation Forum

453-3

Improved east-west service in Shoreline, connecting SR 99 BRT, I-5 LRT and SR 522 HCT is included as a representative project in Appendix A under the Potential Plan Modifications Alternative. Regional express bus along 145th Street from I-5 to SR 522 is included in the Potential Plan Modifications Alternative as Corridor 40 (previously numbered #29 in the Draft SEIS).

Sound Transit will continue to participate in the City's RDP process including the potential for widening 145th Street. Section 4.9 of the Final SEIS has been modified to note that any improvements on 145th Street would be consistent with the City of Shoreline's RDP for 145th Street.

453-4

For the Final SEIS, the name of corridor 3 has been modified to include Shoreline Community College.

453-5

The NE 130th Street station is a potential station location being evaluated as part of the project-level Lynnwood Link Extension project EIS. In November 2013, the Sound Transit Board identified a preferred light rail route and station alternatives that identified NE 130th Street as a potential station location. The station is being further evaluated in a Final EIS that is scheduled to be completed in 2015.

453-6

Improved east-west service in Shoreline, connecting SR 99 BRT, I-5 LRT and SR 522 HCT is a representative project in the Final SEIS as part of the Potential Plan Modifications Alternative (Appendix A, Table A-11). Regional express bus along 145th Street from I-5 to SR 522 is included in the Potential Plan Modifications Alternative as Corridor 40. Sound Transit recognizes that regional transit is part of a larger transportation system that also includes local feeder bus and streetcar services, as well as multimodal access on foot and by bike. For the system as a whole to achieve a high degree of efficiency, all of these systems need to be integrated. Towards that end, Sound Transit is working with its local partner agencies to develop and implement proposals to integrate transit service in concert with light rail expansion, to ensure that service is delivered as efficiently and effectively as possible to the public.

453-7

A non-motorized bridge providing access to the 145th Street HCT station has been added as a representative project under the Current Plan Alternative (see Appendix A of the Final SEIS, Tables A-1 through A-6). These are projects that could be implemented along the corridors that comprise the Current Plan Alternative regardless of whether service is already in operation along those corridors. The list represents the types of projects or support facilities that could be implemented in the future if, and when, any of the HCT

453-7

corridors (as shown on the Current Plan Alternative map) are implemented.

453-8

A park-and-ride facility in Lake Forest Park is one of the representative projects listed in the SEIS Appendix A, Table A-6), and could be implemented if included in a future system plan.

453-9

Please see the response to common comment 17 - Feeder bus service in Section 5.3.4 of Chapter 5 of this Final SEIS.