

Appendix D

Section 4(f)/6(f) Evaluation

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Section 4(f)/6(f) Evaluation

D.1 Introduction

This appendix provides documentation necessary to support determinations required to comply with the provisions of United States Code (USC), Title 49, Section 303 (hereinafter referred to as “Section 4(f)”) and the Land and Water Conservation Fund (LWCF) Act of 1965 (hereinafter referred to as “Section 6(f)”). Section 4(f) properties are publicly owned lands of a park, recreation area, or wildlife and waterfowl refuge or land of a historical site of national, state, or local significance as determined by the federal, state, regional, or local officials having jurisdiction over the resource. Section 6(f) properties are recreation resources funded by the LWCF Act. Land purchased with these funds cannot be converted to a nonrecreation use without coordination with the National Park Service (NPS) and mitigation that includes replacing the quality and quantity of land used. Converting any portion of these lands follow Code of Federal Regulations, Title 36, Section 59.3 of the Land and Water Conservation Fund Program. This appendix addresses impacts, mitigation and avoidance alternatives on Section 4(f) resources followed by similar discussion on Section 6(f) resources. Section 6(f) regulations and procedures are described in more detail beginning in Section D.6 of this appendix.

Only those Section 4(f) or Section 6(f) resources that are potentially impacted by East Link are addressed in this analysis. Information on publicly owned parklands, recreation lands, wildlife and waterfowl refuges, and historic sites is provided in Section 4.17, Parkland and Open Space; Section 3.16, Historic and Archaeological Resources; and Appendix H4, *East Link Project Historic and Archaeological Resources Technical Report*.

Code of Federal Regulations (CFR), Title 23, Part 774, which directs the use of Section 4(f) resources, as amended March 2008, states the following:

“The Administration may not approve the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land of an historic site of national, state, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge or site), unless a determination is made under paragraph (a) or (b) as follows:

- (a) *The Administration determines that:*
 - (1) *There is no feasible and prudent avoidance alternative to the use of land from the property; and*
 - (2) *The action includes all possible planning to minimize harm to the property resulting from such use; or*
- (b) *The Administration determines that the use of the property, including any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures) committed to by the applicant, will have a de minimis impact on the property.*
- (c) *If the analysis concludes that there is no feasible and prudent avoidance alternative, then the Administration may approve only the alternative that causes the least overall harm in light of the statute's preservation purpose.”*

The proposed East Link Project, which is evaluated in this Environmental Impact Statement (EIS), is a transportation project that might receive federal funding and/or discretionary approvals through the U.S. Department of Transportation (USDOT) (e.g., Federal Transit Administration [FTA]); therefore, documentation of compliance with Section 4(f) is required. In addition, this evaluation incorporates Section 6009(a) of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), Publication L, 109-59. This act amended existing Section 4(f) legislation at 138 USC 23 and 303 USC 49 to simplify the processing and approval of projects that have only *de minimis* impacts on properties protected by Section 4(f). For the East Link Project, FTA is the lead federal agency for USDOT, which makes the final determination on *de minimis* for a particular resource.

A finding of *de minimis* may occur when all possible planning to minimize harm by reducing the impacts on the Section 4(f) property to a *de minimis* level such that the impact does not result in an adverse effect [23 CFR §774.2(b)]. When a finding of *de minimis* can be reached, an analysis of feasible and prudent avoidance alternatives is not required (23 CFR §774.17). The following criteria must be met to conclude a *de minimis* finding:

- For parks, recreation areas, and wildlife and waterfowl refuges, a *de minimis* finding may be

made only if the following apply [23 CFR § 774.5(b)]:

- Public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of the property must be provided. This requirement can be satisfied in conjunction with other public involvement procedures, such as a comment period provided on a National Environmental Policy Act (NEPA) document.
- The Administration shall inform the official(s) with jurisdiction of its intent to make a *de minimis* impact finding. Following an opportunity for public review and comment as described in paragraph (b)(2)(i) of this section, the official(s) with jurisdiction over the Section 4(f) resource must concur in writing that the project will not adversely affect the activities, features, or attributes that make the property eligible for Section 4(f) protection.
- For a historic site, a *de minimis* finding might be made only if, in accordance with the Section 106 process of the National Historic Preservation Act of 1966 (NHPA) and written concurrence from the State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO) and from the Advisory Council on Historic Preservation (ACHP), it is found that the transportation program or project will have no impact or no adverse impact on historic properties. FTA shall inform these officials of its intent to make a *de minimis* impact determination based on their concurrence in the finding of “no adverse effect” or “no historic properties affected.”

Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. In this Final EIS, Section 4.16 documents and Appendix H4, the *East Link Project Historic and Archaeological Resources Technical Report* documents these resources, project effects, and mitigation measures. According to 36 CFR 800 (Section 800.5(a)(1)), the criterion for an adverse effect triggering the Section 106 process is as follows:

“An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling or association.”

Pursuant to 36CFR 800.5(b), an agency may include impact minimization measures as a condition of the project to avoid an adverse effect:

“The agency official, in consultation with the SHPO/THPO, may propose a finding of no adverse effect when the undertaking’s effects do not meet the criteria of paragraph (a)(1) of this section or the undertaking is modified or conditions are imposed, such as the subsequent review of plans for rehabilitation by the SHPO/THPO to ensure consistency with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines, to avoid adverse effects.”

The evaluation presented in this Section 4(f)/6(f) Evaluation accomplishes the following:

- Identifies Section 4(f) and Section 6(f) resources (Section 6(f) is discussed in Section D.7) along the East Link Project alternative routes, stations, and maintenance facilities
- Discusses how the project elements would affect the resources
- Lists impacted Section 4(f) resources that would qualify for a *de minimis* finding
- Determines whether there are feasible and prudent alternatives that avoid the use of Section 4(f) properties;
- Identifies potential measures that should be considered to minimize harm resulting from unavoidable adverse impacts on Section 4(f) properties; and
- Presents an overall least harm analysis.

The evaluation also documents Sound Transit’s and FTA’s consultation with public agencies that have jurisdiction over the Section 4(f) and 6(f) properties.

D.2 Proposed Action

The proposed action is to expand the Sound Transit Link light rail system from Seattle to Mercer Island, Bellevue, and Redmond via Interstate 90 (I-90) to provide a reliable and efficient transportation mode for moving people throughout the region.

This Section 4(f)/6(f) Evaluation was prepared in conjunction with the East Link Project Final EIS. The Final EIS Chapter 1, Purpose and Need, and Chapter 2, Alternatives Considered, provide the complete description of the proposed action, and Chapter 2 also illustrates the alternatives considered in this report. Sections 4.16 and 4.17 of the Final EIS describe the historic properties and park and recreational resources

in the study area, respectively. Finally, Exhibit D-1 in this Section 4(f)/6(f) Evaluation (see Section D.4.1) depicts the location of the Section 4(f)/6(f) facilities, and Appendix H4, *East Link Project Historic and Archaeological Technical Report*, of the Final EIS shows the location of resources eligible for the National Register of Historic Places (NRHP).

D.3 Definition of Section 4(f) "Use"

Per 23 CFR 774.11, Section 4(f) applies only to those portions of such lands which function for, or are designated in the plans of the administering agency as being for, significant park, recreation, or wildlife and waterfowl refuge purposes as determined by the official(s) with jurisdiction over the Section 4(f) resource. The Section 4(f) requirements apply to historic sites (both structures as well as archaeology sites) on or eligible for the National Register and those portions of the U.S. Interstate System formally identified by Federal Highway Administration (FHWA) for Section 4(f) protection based on national or exceptional historic significance. Impacts on Section 4(f) resources, or properties, occur when there is a "use" of the properties. Such impacts can consist of either a direct or a constructive use of the properties, as defined in the following subsections. The 4(f) resource must be publicly owned at the point at which "use" occurs. As defined in 23 CFR 774.17, the "use" of a protected Section 4(f) resource occurs when one or more of the following occur:

- Land is permanently incorporated into a transportation facility (e.g., "direct use")
- There is a temporary occupancy of land that is adverse in terms of the preservationist purposes (e.g., "temporary use")
- There is no permanent incorporation of land, but the proximity of a transportation facility results in impacts so severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired (e.g., "constructive use")

D.3.1 Direct Use

A direct use of a Section 4(f) resource takes place when property is permanently incorporated into a proposed transportation facility (23 CFR 774.17). This might occur as a result of partial or full acquisition, permanent easements, or temporary easements that exceed regulatory limits noted in Section D.3.2.

D.3.2 Temporary Use

A temporary use of a Section 4(f) resource occurs when the property is temporarily occupied and that

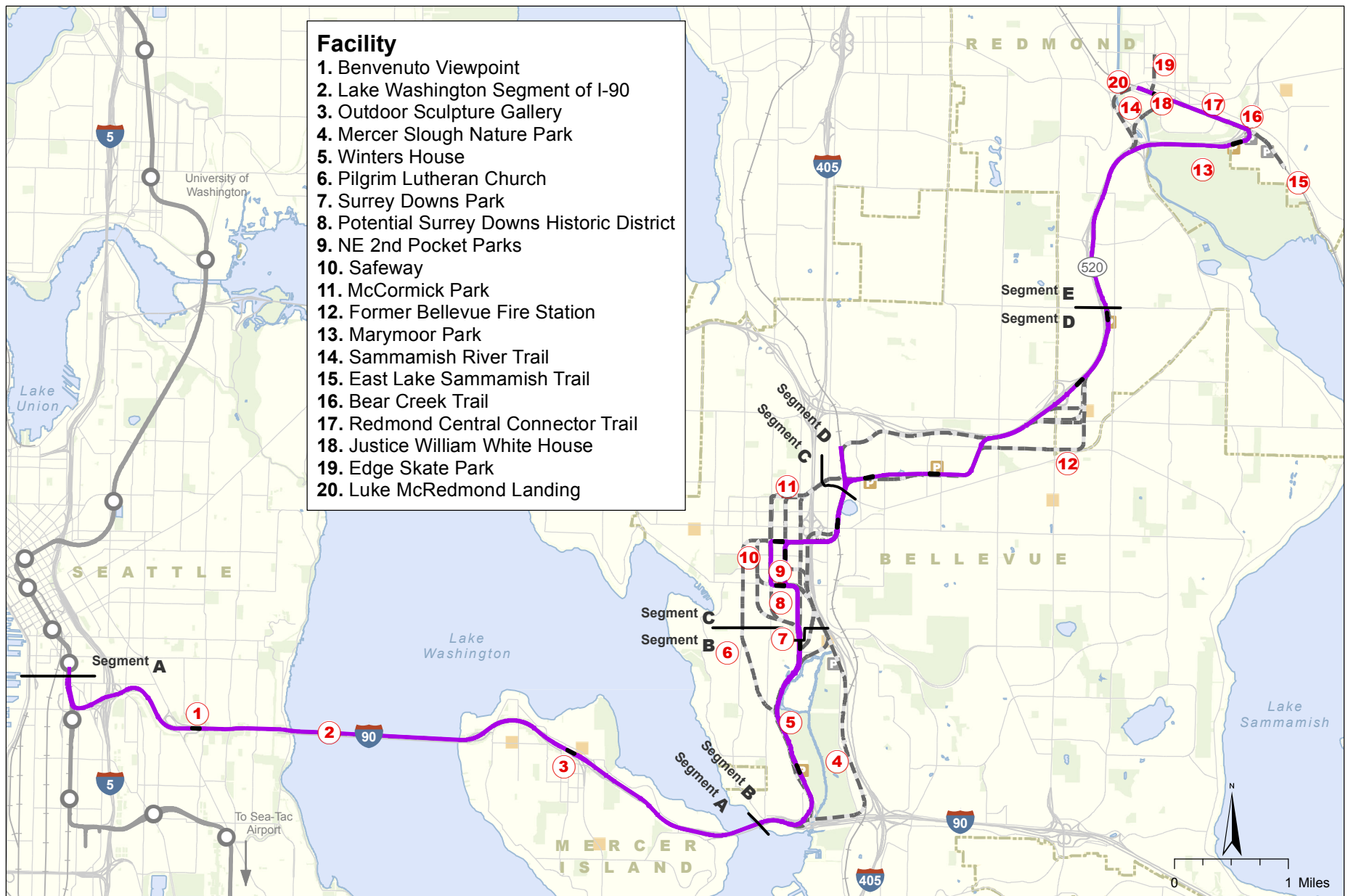
occupancy is considered adverse in terms of the preservationist purposes of the Section 4(f) statute. Under the FTA/FHWA regulations (23 CFR 774.13[d]), a temporary occupancy of property does not constitute a use of a Section 4(f) resource when the following conditions are satisfied:

- The occupancy must be of temporary duration (e.g., shorter than the period of construction) and must not involve a change in ownership of the property.
- The scope of work must be minor, with only minimal changes to the protected resource.
- There must be no permanent adverse physical impacts on the protected resource or temporary or permanent interference with activities or purpose of the resource.
- The property being used must be fully restored to a condition that is at least as good as existed prior to the proposed project.
- There must be documented agreement of the appropriate officials having jurisdiction over the resource regarding the foregoing requirements.

D.3.3 Constructive Use

A constructive use of a Section 4(f) resource occurs when a transportation project does not permanently incorporate land from the resource, but the project's proximity results in impacts (e.g., noise, vibration, visual, access, and/or ecological impacts) so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired (23 CFR 774.15). Substantial impairment occurs only if the protected activities, features, or attributes of the resource are substantially diminished. A "constructive use" test to determine whether the resources are substantially diminished as defined in 23 CFR 771.135(p)(6) and summarized as:

- Identifying the current activities, features, or attributes of the resource that might be sensitive to proximity impacts
- Analyzing whether the potential proximity impacts on the protected Section 4(f) resource per 23 CFR 771.135(p)(4) and (5): the noise level increase attributable to the project substantially interferes with the use and enjoyment of the noise-sensitive facility; the esthetic features or attributes of the resource are diminished (obstructs or eliminates primary views of the buildings), restrictions in access diminish the utility of the resource; or the vibration impact substantially diminishes the use of the resource
- Consulting with the appropriate officials having jurisdiction over the resource



Source: Data from City of Seattle (2002) and King County (2006).

— East Link Preferred Alternative
 - - - East Link Alternatives
 ○ Central Link Alignment and Station

● Proposed Station
 --- City Limits

■ Existing Park-and-Ride Lot
 P New and/or Expanded Park-N-Ride Lot

Exhibit D-1
Section 4(f) Facilities
 East Link Project

D.4 Impacts on Section 4(f) Resources

D.4.1 Range of Potential Impacts

Section 4.17, Parkland and Open Space, and Appendix F4.17 of the Final EIS provides information on the parks within the East Link Project study area. No designated wildlife and waterfowl refuges exist in the study area. FTA, with concurrence from the SHPO in the Department of Archaeology and Historic Preservation (DAHP), found the following resources eligible for the NRHP in the study area: Pilgrim Lutheran Church, the Surrey Downs potential historic district, the Safeway Store, the Former Bellevue Fire Station, the Justice White House, and the Bill Brown Saloon. Additional resources include U.S. Immigration Station and Assay Office Building (INS Building), the Publix Hotel (contributor to the China Town Historic District), the Jose Rizal 12th Avenue South Bridge, the Will H. Thompson House, the Lake Washington Segment of I-90 (including the Mount Baker Ridge Tunnel and Eastern Portals), and the Winters House.

Table D-1 lists the park resources and properties on or eligible for the NRHP that would be potentially affected by project alternatives, either directly or as a result of proximity impacts and construction impacts and, thus, are afforded protection under Section 4(f) regulations. The range of potential impacts on Section 4(f) resources from the build alternatives follows:

- Acquisition of portions of specific Section 4(f) properties
- Long-term proximity impacts on some of these properties, none of which result in a “constructive use”
- Temporary construction impacts

Some of the properties discussed in Section 4.17 of the EIS are not discussed in this Section 4(f)/6(f) Evaluation because, pursuant to Section 4(f) regulations, they are not considered to be a significant resource as determined by the local jurisdiction (e.g., Bellevue Way SE Greenbelt), they are not publicly owned (e.g., Town Center Open Space), or their primary purpose has been identified to be other than Section 4(f) purposes (e.g., I-90 Trail, landscaped areas of Park on the Lid). Section 4.16 and 4.17 include exhibits illustrating the area of impacts for each historic and park resource, respectively. Table D-1 provides an overview of the potential impacts on each resource, mitigation proposed, and the preliminary 4(f) findings after mitigation, and Exhibit D-1 shows the location of the 4(f) properties. FTA and Sound Transit have consulted with officials who have jurisdiction over the resources

and Section D.8, Record of Coordination, provides more detail. These officials have submitted letters reflecting their views regarding impacts to Section 4(f) resources in their respective jurisdictions (see Attachment D1 at the back of this Section 4(f)/6(f) Evaluation).

FTA in consultation with SHPO, has made a determination of Adverse Effect for the project under Section 106, resulting from potential impacts on the Winters House (*Preferred Alternative B2M*) and the potential Surrey Downs Historic District (*Preferred Alternative C11A*). In addition, the potential Surrey Downs Historic District would be impacted by Alternatives C4A, C2T, and C3T) and the Justice White House (Alternative E4).

Based on the analysis of park impacts presented, the determination of effect to historic resources, and coordination with officials having jurisdiction, FTA has made a determination of *de minimis* finding for the 4(f) resources in the study area for all other project alternatives and design options under the jurisdiction of the City of Seattle, City of Mercer Island, City of Redmond, and King County. Correspondence documenting the jurisdiction’s concurrence is attached in the back of this Section 4(f)/6(f) Evaluation. A *de minimis* determination has not been made for park resources under the jurisdiction of the City of Bellevue. The following subsections describe the impacts of the alternatives by segment. This Section 4(f)/6(f) Evaluation does not provide any further discussion for resources that have no use from any of the East Link Project alternatives.

D.4.2 Potential Impacts of Project Alternatives

All East Link Project Alternatives in Segments A, B, C, and E, with the exception of Alternatives C7E and C14E, come in contact with Section 4(f) resources either during project construction and/or during operation. No park or recreational resources are located in Segment D, but there is one historic resource located along Alternative D3.

D.4.2.1 Segment A

There are three potential Section 4(f) uses within Segment A. The Lake Washington Highway Segment of I-90 has been determined eligible for the National Register since the 2008 Draft EIS was published and is discussed below. Benvenuto Viewpoint in Seattle is a 4(f) resource in Segment A along I-90. Last, if the pedestrian bridge option is included at the Mercer Island Station, then the Outdoor Sculpture Gallery would also be impacted.

TABLE D-1
Impacts and Mitigation Measures for Section 4(f) Resources

Facility (size)	Impact	Mitigation	Associated Alternative	<i>De Minimis, Use, or No Use</i>
Parks				
Segment A				
Benvenuto Viewpoint (1.7 acres)	Permanent: Less than 0.1 acre acquired Temporary: Construction impacts ^a	Permanent: ▪ Design station entrance to be compatible with the City's park design. Temporary: ▪ Restore temporarily disturbed area to existing conditions.	<i>Preferred Alternative A1</i>	<i>de minimis</i>
Outdoor Sculpture Gallery (1.6 acre)	Permanent: 0.3 acre acquired with the pedestrian bridge only (option not included in the <i>Preferred Alternative</i>) Temporary: Construction impacts ^a Partial closure during construction	Permanent: ▪ Design station entrance to be compatible with the surrounding the park. Temporary: ▪ Restore temporarily disturbed area to existing conditions.	A1 - Mercer Pedestrian Bridge Design Option	<i>de minimis</i>
Segment B				
Mercer Slough Nature Park (320 acres)	Permanent: Up to 3.0 acre converted to light rail use (a portion of which is aerial easement) Vehicular access to Sweylocken boat ramp modified right-in/right-out Trails relocated Vehicular access to Winters House and blueberry farm combined Temporary: 3.6 acres disturbed Construction impacts ^a Parking at Winters House and blueberry farm closed Winters House and blueberry farm retail closed Trails and access points closed	Permanent: ▪ Acquire replacement land pursuant to Washington State Recreation and Conservation Office (RCO) and Section 6(f) requirements that would be consistent with the natural character of the park. ▪ Have an option to preserve existing vehicle access to Sweylocken boat ramp. Temporary: ▪ Provide financial compensation for temporary use of land as agreed to with the City. ▪ Restore temporarily disturbed areas to existing conditions. ▪ Provide temporary parking for users off Bellevue Way and south of the park-and-ride or as agreed to with the City. ▪ Relocate blueberry farm retail use during construction. ▪ Maintain blueberry farm operations. ▪ Relocate Eastside Heritage Center during construction. ▪ Maintain access or provide detours for trails, and maintain access to Sweylocken boat ramp.	<i>Preferred Alternative B2M</i>	Use
	Permanent: 0.5 to 1.7 acres converted (includes aerial easements) Temporary: 1.7 to 2.6 acres disturbed Construction impacts ^a Certain trail access points closed Access to boat launch revised (Alternative B1 only)	Permanent: ▪ Acquire replacement land pursuant to RCO and Section 6(f) requirements or provide financial compensation as agreed with the City. Temporary: ▪ Provide financial compensation for temporary use of land as agreed to with the City. ▪ Restore temporarily disturbed areas to existing conditions. ▪ Maintain access or provide detours for trails, and maintain access to Winters House, blueberry farm, and boat launch where affected as agreed to with the City. ▪ Provide new signal for full access to boat launch (Alternative B1 only).	All other Segment B Alternatives	Use

TABLE D-1 CONTINUED
Impacts and Mitigation Measures for Section 4(f) Resources

Facility (size)	Impact	Mitigation	Associated Alternative	De Minimis, Use, or No Use
Segment C				
Surrey Downs Park (11.4 acres)	Permanent: 0.5 acre acquired North access to park eliminated; south access changed to right- in/right-out only Temporary: 0.6 acre disturbed Access restricted Construction impacts ^a	Permanent: <ul style="list-style-type: none"> Replace impacted acreage with the acquired properties north of the park along 112th Avenue SE and provide landscaping. Design treatments of the retaining wall and fence along 112th Avenue SE in consultation with the City. Design and construct a U-turn on 112th Avenue SE at SE 8th Street. Prepare conceptual layout for two northbound-to-southbound U-turn options – one at SE 6th Street and one at Main Street – to accommodate those coming from the south who would want to turn left into the park; the City and Sound Transit would pick one that Sound Transit would design and construct. Coordinate with the City of Bellevue and the community to revise the Surrey Downs Park Master Plan to address the impact area. Temporary: <ul style="list-style-type: none"> Provide financial compensation for the temporary use of land as agreed with the City. Restore the temporarily disturbed area with landscaping in accordance with the Surrey Downs Master Park Plan. Maintain overall access to the park by providing trail and sidewalk connectivity through detours in coordination with the City. Maintain public parking and access for scheduled baseball/soccer fields (spring, late summer, and fall). Provide a barrier or fence adjacent to the main construction area. Improve south driveway to increase traffic flow prior to closure of the north driveway. 	Preferred Alternative C11A from Preferred Alternative B2M	Use
	Permanent: 0.5 acre acquired Temporary: 0.5 acre disturbed Construction impacts ^a	Permanent: <ul style="list-style-type: none"> Replace impacted acreage with the acquired properties north of the park along 112th Avenue SE, and provide landscaping. Design treatments of the retaining wall and fence along realigned SE 4th Street in consultation with the City. Coordinate with the City of Bellevue and the community to revise the Surrey Downs Park Master Plan to address the impact area. Temporary: <ul style="list-style-type: none"> Provide financial compensation for the temporary use of land as agreed with the City. Restore the temporarily disturbed area with landscaping in accordance with the <i>Surrey Downs Master Park Plan</i>. Maintain overall access to the park by providing trail and sidewalk connectivity through detours in coordination with the City. Maintain public parking and access for scheduled baseball/soccer fields (spring, late summer, and fall). Provide a barrier or fence adjacent to the main construction area. Improve south driveway to increase traffic flow prior to closure of the north driveway. 	Preferred Alternative C9T from Preferred Alternative B2M	Use

TABLE D-1 CONTINUED
Impacts and Mitigation Measures for Section 4(f) Resources

Facility (size)	Impact	Mitigation	Associated Alternative	<i>De Minimis, Use, or No Use</i>
Surrey Downs Park (11.4 acres) contd.	<p>Permanent: Less than 0.1 to 0.5 acre acquired</p> <p>Temporary: 5.7 acres disturbed (Alternatives C2T and C3T from Alternative B2A only) Less than 0.1 to 0.4 acre disturbed (Alternatives C4A, C7E, and C9A from Alternative B2A only) Construction impacts ^a</p>	<p>Permanent:</p> <ul style="list-style-type: none"> Provide financial compensation or replacement land as agreed with the City. <p>Temporary (Alternative C2T and C3T from Alternative B2A):</p> <ul style="list-style-type: none"> Provide financial compensation for the use of land as agreed with the City. Restore landscape after construction to existing conditions or as agreed to with the City; maintain overall access to the park by providing trail and sidewalk connectivity through detours in coordination with the City. Maintain public access and parking for scheduled baseball/soccer fields (spring, late summer, and fall). Provide a barrier or fence adjacent to the main construction area. <p>Temporary (Alternative C4A, C7E, and C9A from Alternative B2A only):</p> <ul style="list-style-type: none"> Provide financial compensation for the temporary use of land as agreed with the City. Restore temporarily disturbed park area to existing conditions. 	Alternatives C2T, C3T, C4A, and C7E from Alternative B2A	Use
NE 2nd Pocket Parks (0.62 acre)	<p>Permanent: 0.1 acre acquired</p> <p>Temporary: 0.3 acre disturbed, partially closed Construction impacts ^a</p>	<p>Permanent:</p> <ul style="list-style-type: none"> One, or a combination of the following, as agreed to with the City: <ul style="list-style-type: none"> Provide financial compensation as agreed to with the City. Provide replacement land with an equivalent portion of the project's staging area located on the northeast quadrant of the park. Enhance entire northwest quadrant of the park as a public plaza in conjunction with the station entrance. <p>Temporary</p> <ul style="list-style-type: none"> Provide financial compensation for the temporary use of land as agreed to with the City. Restore temporarily disturbed park area to existing conditions. Preserve pedestrian access to southern park quadrants. 	<i>Preferred Alternative C9T from Preferred Alternative B2M and Alternatives B2A, B2E, and B7</i>	Use
	<p>Permanent: Less than 0.1 to 0.1 acre acquired</p> <p>Temporary: 0.1 to 0.3 acre disturbed, partial closure Construction impacts ^a</p>	<p>Permanent (Alternatives C4A and C9A from Alternatives B2A, B2E, and B3 only):</p> <ul style="list-style-type: none"> Provide financial compensation or replacement land as agreed to with the City. <p>Permanent (Alternative C8E from Alternatives B3 and B7 only):</p> <ul style="list-style-type: none"> Provide financial compensation or replacement land as agreed to with the City. Add visual and aesthetic design measures, as agreed to with the City. <p>Temporary:</p> <ul style="list-style-type: none"> Provide financial compensation for the temporary use of land as agreed to with the City. Restore temporarily disturbed park area to existing conditions. Preserve pedestrian access to southern park quadrants. 	Alternatives C4A and C9A from B2A, B2E, B3; B7 and Alternative C8E from B3 and B7	Use

TABLE D-1 CONTINUED
Impacts and Mitigation Measures for Section 4(f) Resources

Facility (size)	Impact	Mitigation	Associated Alternative	De Minimis, Use, or No Use
McCormick Park (2.69 acres)	Permanent: 0.2 to 0.9 acre acquired, net gain of 0.1 to 0.7 acres Temporary: 0.8 to 1.8 acres disturbed Construction impacts ^a	Permanent: <ul style="list-style-type: none"> One or more of the following measures would be implemented: <ul style="list-style-type: none"> Acquire replacement land for permanent use impacts. Results in net increase in park land for some alternatives. Provide financial compensation for use during construction. Temporary: <ul style="list-style-type: none"> Restore disturbed area after construction. 	Alternatives C3T and C4A from Alternatives B2A, B2E, B3, and B7; Alternative C8E from Alternatives B3 and B7	Use
Segment D				
No parks or trails affected				
Segment E				
Luke McRedmond Landing (2.1 acres)	Permanent: 0.1 acre aerial easement Temporary: 0.1 acre disturbed Construction impacts ^a	Permanent: <ul style="list-style-type: none"> One or more of the following measures would be implemented: <ul style="list-style-type: none"> Provide financial compensation for permanent aerial easement or improvements to the park as agreed to with the City. Replace trees removed per City tree ordinance. Temporary: <ul style="list-style-type: none"> Provide financial compensation for the temporary use of land during construction, as agreed to with the City. Maintain access to the park during construction. Restore temporarily disturbed area to existing conditions. 	Alternative E1	De minimis
Marymoor Park (640 acres)	Permanent: 2.0 acres Temporary: 3.0 acres disturbed Construction impacts ^a	Permanent: <ul style="list-style-type: none"> Acquire replacement recreation land equal in value and function to offset the light rail use within the park property. Evaluate noise impacts to park uses in place, when Segment E is funded, consistent with FTA noise analysis methods and criteria when design is advanced. Temporary: <ul style="list-style-type: none"> Mitigate temporarily disturbed park lands pursuant to RCO regulations. Provide financial compensation for temporary use of land outside the light rail right-of-way for construction; restore parkland following construction. 	Preferred Alternative E2 and E2 - Redmond Transit Center Design Option	De minimis
Sammamish River Trail (10.88 miles long)	Permanent: 0 to 0.1 acres aerial easement ^b Shading Temporary: 0 to 0.1 acres disturbed ^b Construction impacts ^a	Permanent: <ul style="list-style-type: none"> Acquire replacement recreation land equal in value to offset the light rail within the trail right of way per RCO requirements. Locate guideway columns outside trail clear zone as practical. Temporary: <ul style="list-style-type: none"> Provide financial compensation for temporary use of land outside of the light rail right-of-way for construction. Reroute and restore trail to King County standards and specifications during and after construction. 	Preferred Alternative E2 and Alternatives E2 - Redmond Transit Center Design Option, E1, and E4	De minimis

TABLE D-1 CONTINUED
Impacts and Mitigation Measures for Section 4(f) Resources

Facility (size)	Impact	Mitigation	Associated Alternative	<i>De Minimis, Use, or No Use</i>
Bear Creek Trail (1.4 miles long)	Permanent: 0.1 acre aerial easement Trail section relocated Trail lowered into tunnel track or structure elevated over trail Shading Temporary: Construction impacts ^a	Permanent: ▪ Reroute trail during construction, restore disturbed trail area after construction, and replace trees. Temporary: ▪ Provide financial compensation for the temporary use of land during construction, as agreed with the City. ▪ Maintain access or provide detours for trail during construction. ▪ Restore temporarily disturbed area to existing conditions.	<i>Preferred Alternative E2 and E2 - Redmond Transit Center Design Option</i>	<i>De minimis</i>
	Permanent: 0.1 acre aerial easement Shading Temporary: Construction impacts ^a	Permanent: ▪ Provide financial compensation for permanent aerial easement or improvements to the trail as agreed to with the City of Redmond. Temporary: ▪ Provide financial compensation for the temporary use of land during construction, as agreed with the City. ▪ Maintain access or provide detours for trail during construction. ▪ Restore temporarily disturbed area to existing conditions.	Alternatives E1 and E4	<i>De minimis</i>
East Lake Sammamish Trail (10.7 miles long)	Permanent: Potential trail section relocated with Alternative E2 Trail section relocation with track to MF5 from Alternatives E1 and E4. Temporary: Construction impacts ^a	Permanent: ▪ Provide financial compensation for the light rail use of the trail right of way. Temporary: ▪ Provide financial compensation for temporary use of land outside of the light rail right-of-way during construction. ▪ Reroute and restore trail to King County standards and specifications during and after construction.	<i>Preferred Alternative E2 and Alternatives E2 - Redmond Transit Center Design Option, and E1, and E4</i>	<i>De minimis</i>
The Edge Skate Park (1.4)	Permanent: Less than 0.1 acre acquired Temporary: 0.2 acre disturbed Construction impacts ^a	Permanent: ▪ Provide financial compensation for the light rail use of park as agreed to with the City. Temporary: ▪ Provide financial compensation for the temporary use of land during construction, as agreed to with the City. ▪ Maintain access to the park during construction. ▪ Restore temporarily disturbed area to existing conditions.	E2 - Redmond Transit Center Design Option	<i>De minimis</i>
Redmond Central Connector Trail (3.9 miles long)	Permanent: Trail relocated Temporary: Construction impacts ^a	Permanent: ▪ Possibly permanent reroute of trail, and replace affected park amenities and associated vegetation as agreed to with the City. Temporary: ▪ Provide financial compensation for the temporary use of land during construction as agreed to with the City. ▪ Maintain access or provide detours for trail during construction. ▪ Restore temporarily disturbed area to existing conditions.	<i>Preferred Alternative E2 and Alternatives E2 - Redmond Transit Center Design Option, E1, and E4</i>	<i>De minimis</i>

TABLE D-1 CONTINUED
Impacts and Mitigation Measures for Section 4(f) Resources

Facility (size)	Impact	Mitigation	Associated Alternative	<i>De Minimis, Use, or No Use</i>
Historic Properties				
Segment A				
I-90 Lake Washington Highway Segment	Permanent: Use of center roadway Temporary: Construction impacts ^a	Temporary: <ul style="list-style-type: none"> Typical BMPs to minimize and avoid construction impact would be applied. 	<i>Preferred Alternative A1</i>	<i>De minimis</i>
Segment B				
Winters House	Permanent: Use of property between the structure and Bellevue Way SE for lidded retained-cut structure; potential groundborne noise impact Temporary: Vibration and settlement impacts potential during construction Winters House activities closed Construction impacts ^a	Permanent: <ul style="list-style-type: none"> Standard methods of vibration reduction, such as resilient fasteners or ballast mats will be incorporated into the project or a floating slab would be incorporated as necessary to reduce the level of groundborne noise and eliminate the impact. Landscape the area of property between the front (west elevation) of the Winters House and Bellevue Way SE to more closely reflect the landscaping of the historic period, in consultation with the City. Provide new interpretive displays on or near the property. Temporary: <ul style="list-style-type: none"> Photographing/inventorying the building to establish existing conditions. Installing vibration and settlement monitoring devices and adjusting excavation methods based on monitoring results. Using specific vibration and settlement reducing construction methods, to be determined during final design and construction. Potentially building a construction barrier around Winters House to prevent damage and minimize dust. Applying dust control measures during construction to minimize dust (after construction, Sound Transit would clean the outside of the building and windows in a manner sensitive to the resource). Closing the Winters House during construction and temporarily relocating the tenant (Sound Transit will provide information to the public regarding how to access the Eastside Heritage Center during construction). If damage does occur, making the needed repairs consistent with the U.S. Secretary of the Interior's standards for treating historic properties. 	<i>Preferred Alternative B2M</i>	Use

TABLE D-1 CONTINUED
Impacts and Mitigation Measures for Section 4(f) Resources

Facility (size)	Impact	Mitigation	Associated Alternative	<i>De Minimis, Use, or No Use</i>
Segment C				
Potential Surrey Downs Historic District	Permanent: Potential noise impacts Temporary: Construction impacts ^a	Permanent: <ul style="list-style-type: none"> Install a permanent sound barrier along the south side of the guideway along Main Street to prevent noise impacts on contributing properties in the potential Surrey Downs Historic District. Landscape along south side of the guideway and the 108th Station along Main Street to enhance the neighborhood boundary where non-contributing properties are removed. Temporary: <ul style="list-style-type: none"> Typical BMPs to minimize and avoid construction impact would be applied. Before construction begins, install a solid construction barrier along contributing properties south of Main Street. Where possible, preserve the evergreen trees along the south edge of the proposed station area, east of 108th Avenue SE. 	<i>Preferred Alternative C11A</i>	No constructive use
	Temporary: Construction impacts ^a	Temporary: <ul style="list-style-type: none"> Typical BMPs to minimize and avoid construction impact would be applied. Before construction begins, install a solid construction barrier along contributing properties south of Main Street. 	Alternatives C2T and C3T	No constructive use
	Permanent: Potential noise impacts Temporary: Construction impacts ^a	Permanent: <ul style="list-style-type: none"> Install a permanent sound barrier along the south side of the guideway along Main Street next to contributing properties. Landscape along the south side of the guideway along Main Street to enhance the neighborhood boundary where noncontributing properties are removed. Temporary: <ul style="list-style-type: none"> Typical BMPs to minimize and avoid construction impact would be applied. Before construction begins, install a solid construction barrier along contributing properties south of Main Street. Where possible, preserve the evergreen trees along the south edge of the proposed station area, east of 108th Avenue SE. 	Alternative C4A	No constructive use
Pilgrim Lutheran Church	Permanent: Use of 0.03 acre of property; no impacts on the church Temporary: Construction impacts ^a	Permanent: <ul style="list-style-type: none"> Avoid stormwater vault maintenance during church services and special events to the extent possible. Minimize parking space obstruction during stormwater vault maintenance. Temporary: <ul style="list-style-type: none"> Typical BMPs to minimize and avoid construction impact would be applied. Avoid construction during church services and special events to the extent possible. Restore disturbed areas following construction. 	Alternative B1	<i>De minimis</i>

TABLE D-1 CONTINUED
Impacts and Mitigation Measures for Section 4(f) Resources

Facility (size)	Impact	Mitigation	Associated Alternative	De Minimis, Use, or No Use
Safeway	Permanent: Alignment would travel underground on the property, approximately 170 feet from the building No impacts on the Safeway store Temporary: Construction impacts ^a	Temporary: <ul style="list-style-type: none"> ▪ Typical BMPs to minimize and avoid construction impact would be applied. ▪ Restore disturbed areas following construction. 	Alternative C1T	<i>De minimis</i>
Segment D				
Former Bellevue Fire Station	Permanent Use of narrow section of parcel along Bel-Red Road for widening road for retained cut No impacts on the building Temporary: Construction impacts ^a	Temporary: <ul style="list-style-type: none"> ▪ Typical BMPs to minimize and avoid construction impact would be applied. ▪ Restore disturbed areas following construction. 	Alternative D3	<i>De minimis</i>
Segment E				
Justice White House	Permanent: Building relocated	<ul style="list-style-type: none"> ▪ Consult with SHPO to determine whether an appropriate location can be found to relocate this resource. If such a location can be determined, FTA and Sound Transit would consult with SHPO, the City of Redmond, and other interested parties to develop and to determine a suitable relocation site that preserves the Justice William White House's setting, feeling, and association with the railroad, thus maintaining its eligibility for the NRHP. The relocation would be managed by qualified architects and engineers in a manner to avoid damage to the building and preserve its eligibility for listing in the NRHP. Prior to relocating the building, Sound Transit would fully record the building in its original context through a Level II Historic American Building Survey/Historic American Engineering Record documentation. This would include photographs, measured drawings, and a written history component. If alternative E4 were selected, then the MOA would be altered to include mitigation for the Justice William White House. 	Alternative E4	Use

^a Construction impacts might include impacts such as removed landscape, dust, noise, and/or traffic detours. For historic properties, the setting might be temporarily changed.

^b Impacts to this trail for Preferred Alternative E2, and E2-Transit Center Design Option are zero since the impacted acreage is counted under impacts to Marymoor Park.

The I-90 Trail is a pedestrian and bicycle path that parallels the freeway. FHWA has determined this is a transportation facility rather than a recreational resource and, therefore, would not be a Section 4(f) resource. Also, much of the I-90 Parks on the Lid are determined to be a part of the I-90 freeway and not Section 4(f) resources.

Interstate 90

The Lake Washington Highway Segment of I-90 from milepost 3.4 to 8.9, from the west end of the Martin Luther King, Jr. Way Lid to the east end of the East Channel Lake Washington Bridges, was determined eligible for the National Register by the Washington State Department of Transportation (WSDOT), on behalf of FHWA, under Criteria A and C and Criteria Consideration G. DAHP concurred with this determination in its letter dated November 23, 2009. This segment of I-90 is just over 5 miles long and includes the roadway, with character-defining features such as lids, bridges, tunnels, ramps, noise walls, overcrossings, and undercrossings (shown in Exhibits D-2 and D-3). Major character-defining features include the Mount Baker Ridge Tunnels; the Lacey V. Murrow and Homer M. Hadley floating bridges; the East Channel Lake Washington Bridges; the Martin Luther King Lid; the First Hill Lid; and the Luther Burbank Lid. The lids have pedestrian and bicycle paths, extensive landscaping, and park areas. During the planning of the Homer M. Hadley floating bridges, extensive community and agency planning process resulted in a Memorandum Agreement (MA) in 1976 that included planning for high-capacity transit in the center roadway.

Preferred Interstate Alternative (A1) would fulfill the MA. *Preferred Alternative A1* would use the I-90 center roadway for the light rail guideway and includes a station in the center of I-90 between Rainier and 23rd



EXHIBIT D-2
Mount Baker Ridge Tunnel



EXHIBIT D-3
I-90 Lake Washington Highway Segment

Avenues South, with entrances from 23rd and Rainier Avenues South, and a station with the existing park-and-ride garage on Mercer Island between 77th and 80th Avenues SE with station entrances on 77th and 80th Avenues SE. Both I-90 tunnels and the floating bridge would need to be modified to incorporate light rail, including changes to wall dividers, drainage, tunnel ventilation, and the addition of rails and the overhead catenary system. To equalize weight on the bridge from installing the steel rail, the concrete surface might be made thinner by removing the upper layers. To accommodate movement of the floating bridge in relation to the land abutment, a specialized rail expansion joint would be installed on the bridge. Converting the center roadway to light rail would require closing the westbound 77th Avenue SE off-ramp and modifying other ramps.

Project operation would not affect the I-90 Lake Washington portion of Segment A or its character-defining features, including the portals of the Mount Baker Ridge Tunnels. This segment of I-90 is unique in including both highway and transit elements in its earliest planning stages, unlike most of the national interstate system. There would not be an impact from the East Link Project on the resource and its character-defining features because of its original design to accommodate high-capacity transit, including light rail, and because the design of the proposed light rail project protects and preserves character-defining features. All construction activities would be located within the center of I-90. No character-defining features would be altered or removed by project construction or operation, and construction would not affect the property in a manner that would impair future use of the resource as it was intended.

Benvenuto Viewpoint

The Preferred Alternative A1 would construct the Rainier Station within the center lanes of I-90, west of and below 23rd Avenue South. I-90 is an eight-lane freeway in this location. A pedestrian plaza consisting of ticket vending, escalators, elevator, and stairs to the station would be constructed on 23rd Avenue South in a landscaping strip connecting to Benvenuto Viewpoint. The pedestrian plaza would acquire and directly use less than 0.1 acre of a landscaping strip, or less than 5 percent of the total area of the 4(f) resource. The portion of Benvenuto Viewpoint used as a viewpoint would not experience a change in view. Although the Rainier Station and entrance could be seen from the viewpoint, the station would be consistent with the current transportation-oriented nature of the area, and the views to the west and south would be unaffected. Given the location of the route and station in the center lanes of I-90, no additional noise impacts are anticipated in the 4(f) resource. During construction, the landscaped strip of Benvenuto Viewpoint would likely be removed. A detour would be provided during construction allowing for continued access to the viewpoint. Last, there is no difference in nonpreferred Alternative A1 design options that would change the effects to the I-90 eligible structure.

Outdoor Sculpture Gallery

Preferred Alternative A1

No impact would occur on the Outdoor Sculpture Gallery from *Preferred Alternative A1*.

Alternative A1 Design Options

At the Mercer Island Station, a design option to connect the center platform station on I-90 to the Outdoor Sculpture Gallery via a pedestrian bridge over the eastbound lanes of I-90 is being considered but is not the preferred alternative. Approximately 0.3 acre of property acquisition would occur to accommodate this bridge and the pedestrian plaza, which would consist of ticket vending and information. This connection would allow a more direct connection into Mercer Island's downtown core. During the construction of this option, a portion of the Outdoor Sculpture Gallery would likely close. A detour would be provided during construction allowing for continued access to other portions of the gallery.

D.4.2.2 Segment B

Three 4(f) resources might be impacted by Segment B alternatives: Mercer Slough Nature Park, Winters House, and Pilgrim Lutheran Church. These impacts are discussed below. The City of Bellevue has determined that the Greenbelt Open Space at the intersection of Bellevue Way and 112th Avenue SE is

not a significant park resource and, therefore, not a Section 4(f) resource.

Mercer Slough Nature Park

Preferred 112th SE Modified Alternative (B2M)

Preferred Alternative B2M would follow the length of the western edge of Mercer Slough Nature Park, east of Bellevue Way SE. This area of the park includes wetland and upland habitat, the blueberry farm, fruit and vegetable produce sales, trailheads, a trailered boat launch ramp, the NRHP-listed Winters House, and parking for the blueberry farm and Winters House. Park users in this area include walkers and joggers along the Periphery Loop Trail sidewalk, those accessing the blueberry farm and Winters House, and those accessing the park's interior trails. A 0.2-mile section of the Heritage Loop Trail parallels Bellevue Way SE below the roadway level. Bellevue Way SE, a principal arterial connecting I-90 to Downtown Bellevue, is a prominent element along the edge of the park. The impacted area is not important for wildlife viewing due to disturbance from the adjacent roadway and the South Bellevue Park-and-Ride and active use of the area for the blueberry farm, Winters House, and trail access. *Preferred Alternative B2M* would permanently use 2.9 acres when connecting to *Preferred Alternative C11A* and 3.0 acres when connecting to *Preferred Alternative C9T*, which is less than 1 percent of the 320-acre 4(f) resource (Table D-2). At the south end of Mercer Slough Nature Park where the alternative is elevated, approximately 1.4 acres could still be used for recreational purposes in those areas where there is sufficient clearance.

TABLE D-2
Impacts on Mercer Slough Nature Park

Alternative		Operation Impact Area (acres)	Construction Impact Area (acres)
<i>Preferred Alternative B2M</i>	Connecting to <i>Preferred Alternative C11A</i>	2.9	3.6
	Connecting to <i>Preferred Alternative C9T</i>	3.0	
Alternative B1		0.5	2.6
Alternative B2A		1.7	2.5
Alternative B2E		0.7	1.8
Alternative B3		1.7	2.5
B3 - 114th Design Option		1.7	2.6
Alternative B7		0.9	1.7

This alternative would acquire an approximately 30- to 50-foot width of the Mercer Slough Nature Park's western boundary for approximately 3,200 feet, removing shrubs and trees. This alternative would relocate and consolidate some vehicle and pedestrian access points on the park's west side and the South Bellevue Station would improve park access. Exhibit D-4 depicts the impacted park area and trail and driveway relocations.

The existing blueberry farm driveway would be removed and combined with the Winters House driveway via a new access road to the north, and the section of the Heritage Loop Trail along Bellevue Way would be restored to the east. The project would remove two existing pedestrian connections from Bellevue Way SE to the park, one at the existing blueberry farm driveway and one south of the Winters House parking lot, which would be reconstructed. The pedestrian access north of the Winters House would be relocated slightly south. Although the number of access points would be reduced, the park and its components would remain accessible from various points along Bellevue Way for both vehicles and pedestrians.

In addition, consolidating the access points might be considered a benefit to the park by removing one vehicle crossing of the Periphery Loop Trail and consolidating active use since the City of Bellevue's goals and objectives are to enhance the wetland nature and passive uses of the park. Access to the Swaylocken boat ramp would become right-in/right-out only.

The boat ramp would no longer be accessible from southbound Bellevue Way; however, there is a design option that would maintain the current access allowing left-hand turn movements to the boat launch. Without the design option, users would need to travel to I-90 via SE 8th Street and I-405 to access to launch. The I-90 Trail, and other Mercer Slough Nature Park trails would not be affected.

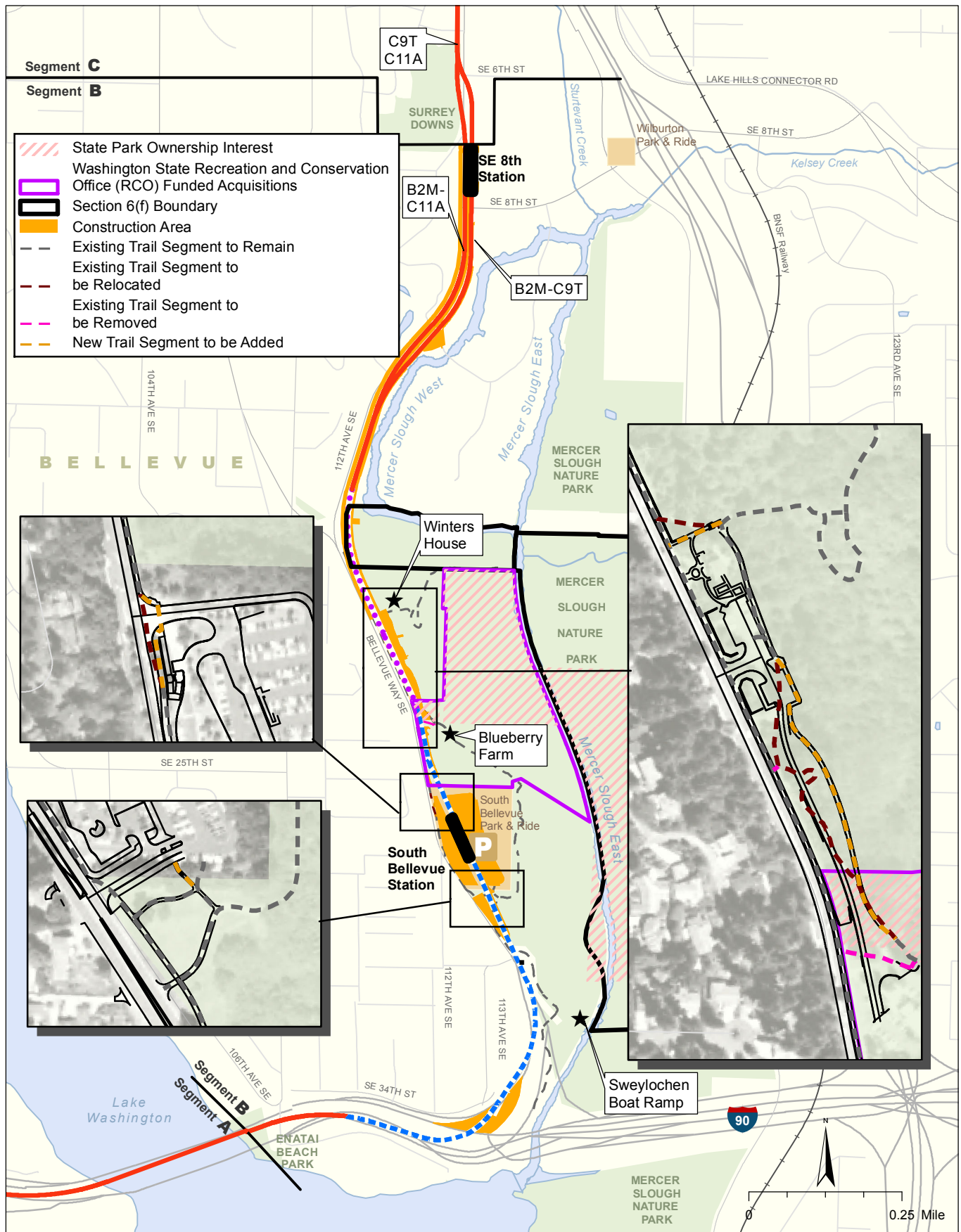
As described Final EIS Section 4.7, Noise and Vibration, existing noise levels in Mercer Slough Nature Park are affected by the major arterial, Bellevue Way SE, and the two interstate highways (I-90 and I-405) that border the park. The active areas on the western edge of the park including the boat launch, blueberry farm, and Winters House, are not considered noise-sensitive, but the interior areas of the park meet the FTA criteria for noise-sensitive areas. Light rail noise levels from operation of *Preferred Alternatives C11A or C9T* connecting to *Preferred Alternative B2M* are predicted to be lower than the existing noise levels by 3 dBA Leq or more at active and noise-sensitive locations within the park. Also the project noise levels in the interior noise-

sensitive areas of the park would be well under the FTA noise impact criteria.

The project would not be seen in most parts of the Mercer Slough Nature Park due to the project's low profile and existing vegetation. Given the presence of trees and large shrubs throughout much of the park, removing vegetation along the alignment would not be noticed in most areas. Removing trees in the construction right-of-way east of Bellevue Way SE and 112th Avenue SE and other street trees would be noticeable from the Periphery Loop Trail (which in this area is the sidewalk adjacent to Bellevue Way SE and 112th Avenue SE) and a portion of the water trail in Mercer Slough West. Operating *Preferred Alternative B2M* would not substantially affect park use; diminish the park's value; or impair the park's activities, features, and attributes.

Construction activities associated with *Preferred Alternative B2M* would encroach into Mercer Slough Nature Park and would require a temporary construction easement of approximately 3.6 acres when connecting with *Preferred Alternative C11A* or *Preferred Alternative C9T*. After construction, these areas would be restored with appropriate native vegetation. Utility relocation and light rail construction in the western edge of Mercer Slough Nature Park would result in increased noise, dust, and temporary access restrictions to western areas of the park.

During construction, the Periphery Loop Trail and sidewalk on the eastern side of Bellevue Way SE would likely close and require detours. Construction along 112th Avenue SE could result in increased noise and dust near the water trail but is not expected to inhibit normal trail use because this is a short section currently characterized by the existing roadway. Construction would close the Winters House temporarily and temporarily relocate the Eastside Heritage Center offices, their files, and services located within the Winters House. The City of Bellevue would not receive rental income from the Winters House during construction. Construction activities would close adjacent parking to the Winters House and the blueberry farm's retail component. The blueberry farm's retail would be relocated to allow the business to continue operation during construction. Farming operations would be maintained during construction, but there would be no public access. Closing parking at the Winters House and closing the South Bellevue Park-and-Ride would reduce available parking on the western side of the park, but other parking accommodations would be made available as well as signage to redirect users to accessible areas. Park users would need to use the existing parking at the boat



Source: Data from City of Bellevue (2005) and King County (2006).

- At-Grade Route
- Elevated Route
- Retained-Cut Route
- Tunnel Route
- Traction Power Substation
- Proposed Station
- New and/or Expanded Park-and-Ride Lot

Exhibit D-4
Mercer Slough Nature Park
Preferred Alternative B2M
 East Link Project

launch and on the eastern side of the park or temporary parking which would be provided off Bellevue Way. There would be no access to the trails located north of the South Bellevue Park-and-Ride, but access would be maintained during construction to the trails located south through detours. Construction would not inhibit normal use and access points on the east side of the park. Constructing *Preferred Alternative B2M* would not substantially affect park use or diminish its value due to the project's location along the park's boundary with Bellevue Way SE.

Other Segment B Alternatives

All Segment B alternatives would affect the Mercer Slough Nature Park to varying degrees. Similar to *Preferred Alternative B2M*, Alternatives B1, B2A, B2E, B3, and B3 - 114th Design Option would provide enhanced accessibility to the Mercer Slough Nature Park by locating a station at the South Bellevue Park-and-Ride. They also would acquire long, narrow, and intermittent portions of this park's western boundary and thereby remove some shrubs and trees, although less area would be acquired compared with *Preferred Alternative B2M* (Exhibit D-5). Of these alternatives, Alternative B2A would require the most acquisition and Alternative B1 the least. The current at-grade Bellevue Way-to-I-90 connection for Alternative B1, however, would not be feasible with WSDOT's requirement to keep the high-occupancy vehicle (HOV) ramps open at that interchange. As a result, Alternative B1 would require an elevated connection over the ramps as in the other Segment B alternatives, and impacts to Mercer Slough Nature Park would increase similar to those alternatives.

Alternatives B2A, B2E, B3, and B3 - 114th Design Option would relocate a portion of the Heritage Farm Trail just east of its current location, between the South Bellevue Park-and-Ride and the Winters House. Access to the Swaylocken boat ramp from 113th Avenue SE would be improved under Alternative B1 because a signal would be installed at this intersection where none exists today. Alternatives B2A, B2E, B3, and B3 - 114th Design Option would be elevated at this location, and access to the Swaylocken boat ramp would be right-in/right-out. The boat ramp would no longer be accessible from southbound Bellevue Way; however, there is a design option that would maintain the current access allowing left-hand turn movements to the boat launch as with *Preferred Alternative B2M*. The I-90 Trail and other Mercer Slough Nature Park trails would not be impacted. The elevated structure would create some additional shading. As with *Preferred Alternative B2M*, the areas below the elevated section could still be available for recreational purposes.

Vegetation removal along Bellevue Way SE and/or the placement of piers for the elevated portions of the alternatives along the west side of Mercer Slough Nature Park would be seen and noticed by some park users but would not interfere with the use of the facility. Similar to the *Preferred Alternative B2M*, the SE 8th Station for Alternatives B2A and B2E would provide enhanced access to the Surrey Downs Park.

Alternative B7 would also impact Mercer Slough Nature Park. The 118th Station on Alternative B7 would provide new access to the east side of Mercer Slough Nature Park and the Mercer Slough Environmental Education Center. The elevated light rail structure would also be located along the south side of Mercer Slough Nature Park north of I-90 and the I-90 Trail. An easement or right-of-use would be needed to accommodate the elevated light rail structure. The area under the elevated structure would be revegetated and returned to park use, allowing access under the guideway and use of the I-90 Trail as it currently exists. As described in Section 4.5, Visual and Aesthetic Resources, the view from the park and trail would not be substantially affected by the new structure. Existing vegetation greatly reduces the amount of Mercer Slough Nature Park that can be seen from most parts of the trail and blocks views to the north. The elevated structure would be seen from the more open parts of the trail but would be screened by adjacent vegetation along other parts of the trail. The elevated structure would also create additional shading in the park.

This portion of the park, the I-90 Trail, as well as the Mercer Slough on the west side of the park near the I-90 off-ramps, would likely be intermittently closed to public access during construction of B7 for safety considerations. Once construction is completed, the area along the light rail elevated guideway would be revegetated and returned to parklands and the trail would remain unaltered. Wetland and other vegetation temporarily displaced by light rail construction, is expected to return to its current growth pattern within about 10 years.

For all nonpreferred alternatives except Alternative B7, reconstructing Bellevue Way SE and sidewalk adjacent to Mercer Slough Nature Park would increase noise and dust and temporarily restrict access to western areas of the park, although detours would be provided to maintain access to trails in this area. Construction is not expected to inhibit normal park use from other points of access. The blueberry farm, located inside the Mercer Slough Nature Park, would experience construction-related impacts under Alternatives B2A, B2E, B3, and B3 - 114th Design Option.

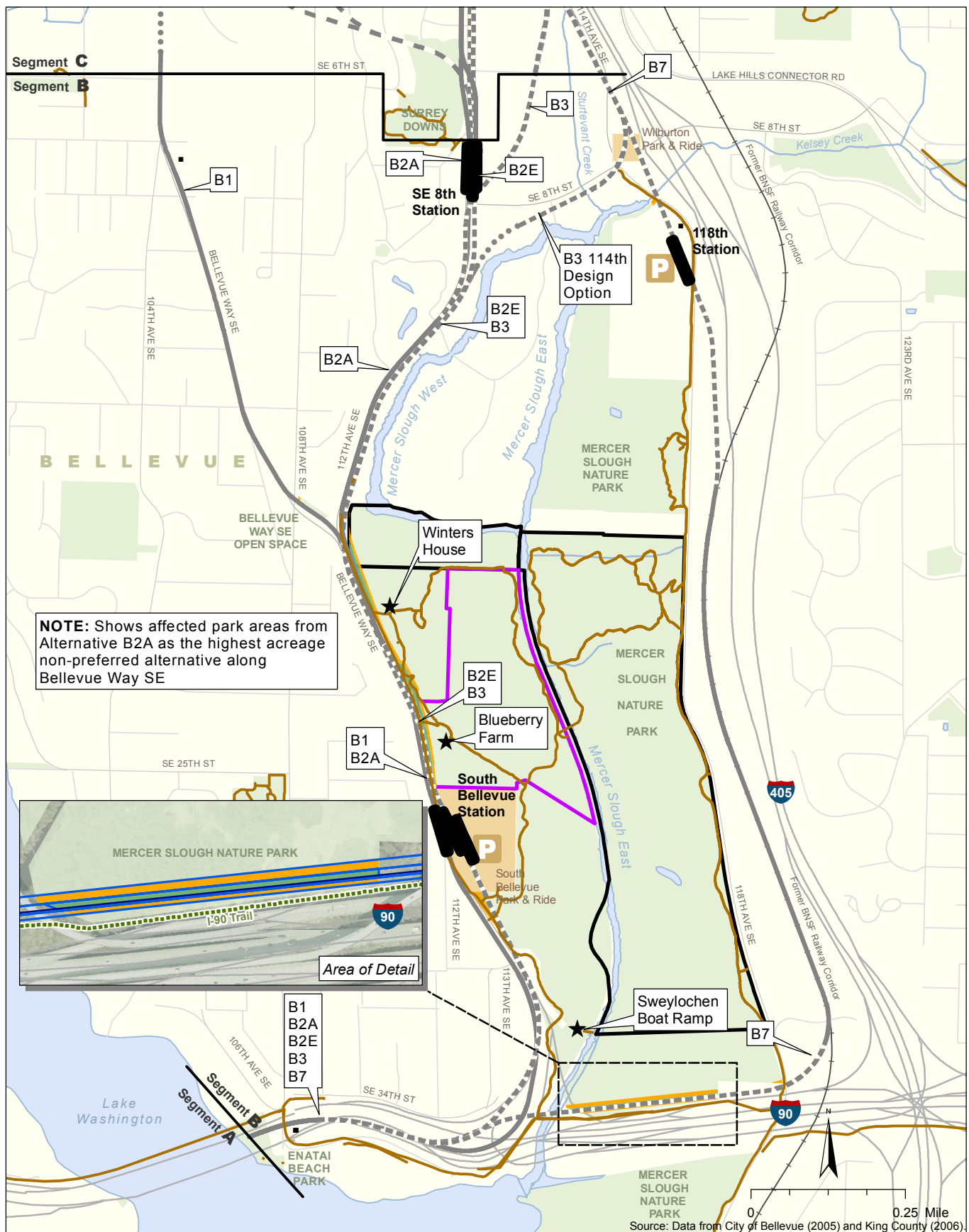


Exhibit D-5 Affected Park Area Alternatives B1, B2A, B2E, B3, B3 114th Design Option, and B7 Segment B
East Link Project

A portion of the entrance to the blueberry farm would need to be reconstructed to accommodate either the light rail structure or the shifted roadway closer to the farm.

Portions of the Mercer Slough Nature Park would be acquired as a temporary construction easement for use as a work area and access for construction. Table D-2 shows the approximate amount of construction area required under each alternative in Mercer Slough Nature Park. Although the park is close to existing noise generators (I-90 and Bellevue Way SE), temporary noise from East Link construction would be greater than is typical in this area.

Winters House

Preferred 112th SE Modified Alternative (B2M)

The Winters House, shown in Exhibit D-6, was listed in the NRHP in 1992 based on its Spanish Eclectic architecture and its association with developments in the bulb-growing and floriculture industry in King County and Washington State. Its period of significance spans from 1929 to 1941. Formerly a residence, the Eastside Heritage Center and the historical archive of the Eastside Heritage Center now occupy the building. The house also includes office space for Bellevue Parks staff, hosts community events and programs, and is a part of the Heritage Loop Trail. The NRHP registration form provides a boundary description that includes 50 feet of property around the house, including a portion of the property along Bellevue Way SE.



EXHIBIT D-6

Winters House, 2102 Bellevue Way SE (present)

The site of the house is bordered on the west by Bellevue Way SE, formerly a county road named Qualheim Road, which has been completely altered into a major arterial roadway that expanded toward the house and on the east by Mercer Slough. While the house's orientation to Bellevue Way at one time would

have been a significant character-defining feature of the structure and its relationship to the surrounding landscape, the roadway's historic design – and, therefore, its relationship to the house – has lost its integrity. The undeveloped grounds' adjacent acreage is associated with the house. Although it is no longer cultivated and no intact outbuildings remain, the house does retain its setting and relationship to the surrounding undeveloped property that is now Mercer Slough Nature Park.

An analysis of the 50-foot designated boundary to determine whether any character-defining landscape features currently remain that convey the significance of the residence and its relationship to the landscape found no such features. Rather, the house's surrounding landscaping was found to have been altered substantially from the historic period of the residence (shown in Exhibit D-7). Except for some mature trees beyond the rear of the residence that once were part of the larger property, the current landscape features do not reflect the original landscape of the residence, nor do they convey the relationship of the landscape to the structure as it was first designed, matured, and allowed to evolve during the historic period of the property.



EXHIBIT D-7

Winters House, 2102 Bellevue Way SE (January 6, 1939)
(courtesy of Eastside Heritage Center)

Most plantings from the period of significance have been removed. Currently, the house consists of a landscaped lawn with a central concrete pathway featuring a center planting strip just opposite the entrance doors of the front elevation. The trees along the property's front and side elevations appear to be plantings from after the period of significance, including relatively new deciduous trees and decorative shrubs. The landscaping in no way reflects the original landscape, while the residence itself remains intact and fully conveys its significance and construction period and relationship to the surrounding undeveloped acreage once cultivated.

Exhibits D-8 and D-9 depict the bird's eye view and cross-section of the existing condition and for *Preferred Alternative B2M*. The guideway would be within a lidded retained cut within the 50-foot boundary for the property established by the NRHP nomination. The eastern edge of the lidded trench right-of-way for *Preferred Alternative B2M* is approximately 5 feet from the front entry and about 10 feet from the house proper. The perspective view and cross-section of *Preferred Alternative B2M* at the Winters House illustrate minimization approaches incorporated as conditions of the project to maintain historic integrity during light rail operation. These elements include placing the light rail in a 170-foot lidded retained cut in front of the structure, extending beyond the length of the 50-foot property boundary to the north and south of the house identified in the NRHP nomination, and installing landscaping that is sensitive to the historic period of the building and setting.

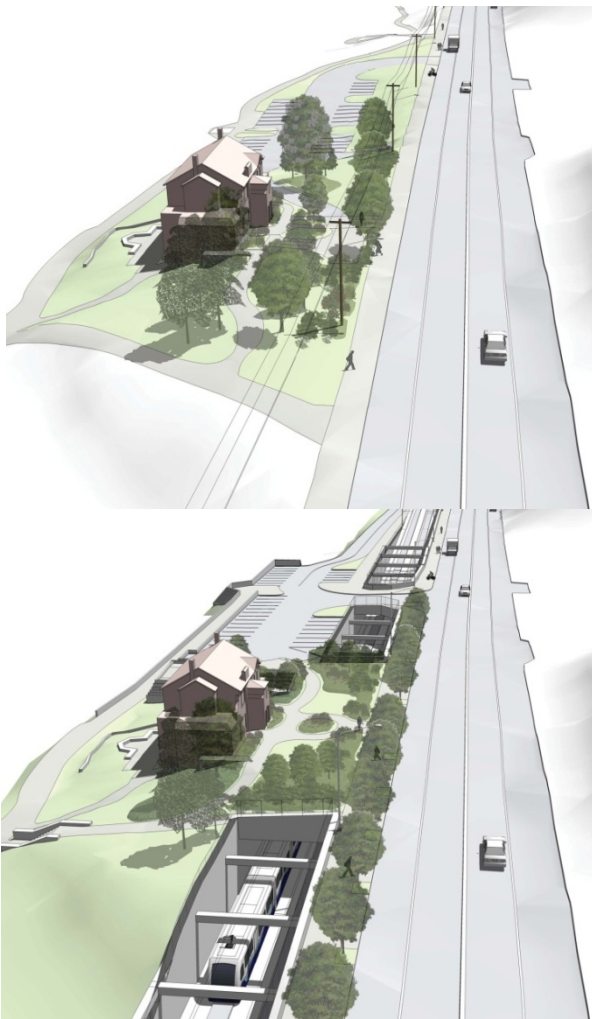


EXHIBIT D-8

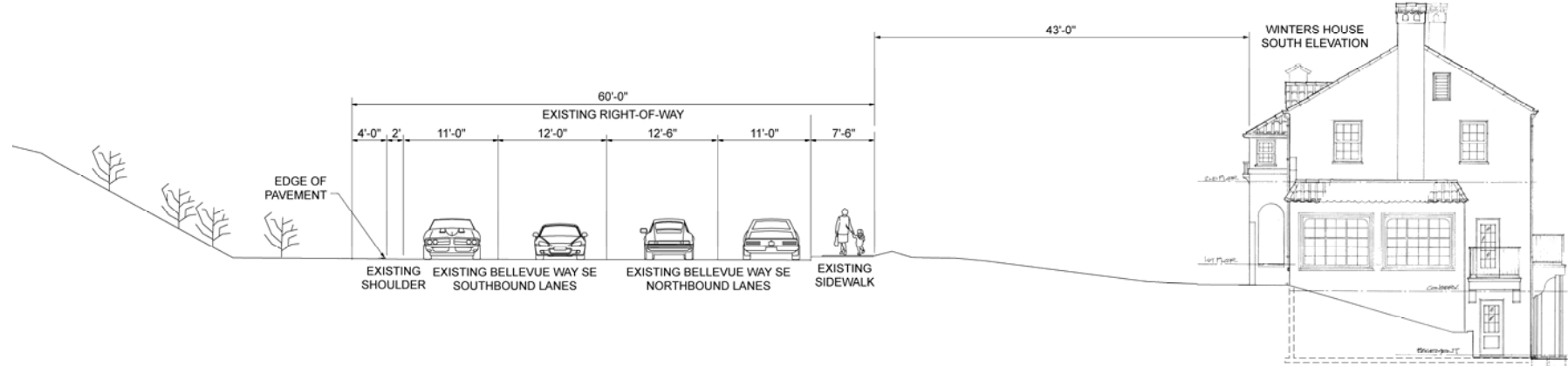
Winters House Bird's Eye View: Existing Condition (top)
and with *Preferred 112th SE Modified Alternative (B2M)*
(bottom)

Bellevue Way SE would remain the same distance from the house. The project would shift the parking lot driveway approximately 90 feet north, with a lid over the light rail to allow vehicles to cross. The parking area would also be shifted slightly to the east. The relocated driveway and parking area would remain outside of the property's 50-foot boundary, and the number of spaces would remain the same. The parking area would also be raised in elevation, which would result in a visual change; however, the visual change in the parking area and associated ramps would not affect the setting of the historic resource because the existing parking lot was not present during the period of significance and does not contribute to the setting. In addition, replanted landscaping would further soften the appearance of the parking lot. Changes to the sidewalk would encroach 5 feet into the property and vehicular access to the garage of the house would not be maintained due to weight limitations on the lidded trench. Due to the proximity of the lidded retained cut and light rail guideway to the Winters House, the potential for settlement and vibration impacts during project operation and construction was analyzed and is described in Section 4.7.3 of the Final EIS.

During operation, a groundborne noise impact is projected at the Winters House. Standard methods of vibration reduction, such as using resilient fasteners or ballast mats, would be incorporated as conditions of the project and reduce the level of groundborne noise but might not eliminate the impact. Sound Transit will determine during final design whether a floating slab is necessary to address the groundborne noise impact. Vibration levels during operation are expected to be below the FTA impact criteria. In addition, the vibration levels are well below even the most stringent criteria for damage to structures.

The potential for damage from construction vibration and settlement due to the proximity of construction activity by the Winters House was evaluated. Given the period and type of the building, vibration and settlement minimization techniques, as described in Section D.5.2.1 below, have been incorporated as project conditions and will prevent damage or limit impacts to minor cosmetic damage, protecting the character-defining features of the former residence that convey its significance. Sound Transit would repair the building if damage were to occur. During construction, the Eastside Heritage Center offices would likely be relocated. In addition, the City of Bellevue would not receive rental income from the Winters House during construction. The Eastside Heritage Center and rental use would return to the building after construction. In addition, in consultation with the City, Sound Transit would replace the landscaping to more closely reflect

Existing



Preferred Alternative B2M

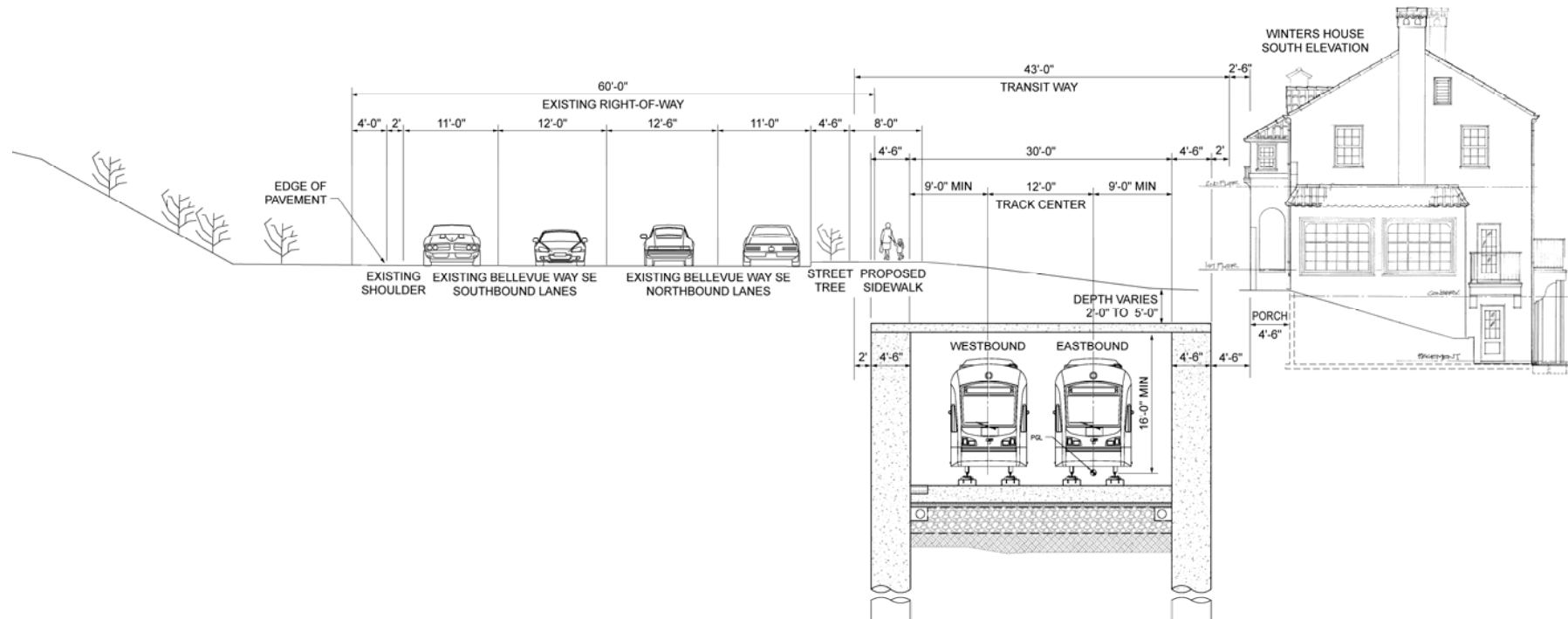


EXHIBIT D-9
Cross-Section of Winters House, Existing Condition and with Preferred 112th SE Modified Alternative (B2M)

the landscaping of the historic period. New interpretive displays would also be installed on or near the property. As a result of these measures, the potential impacts to the Winters House are mitigated, while also benefitting the resource.

Other Segment B Alternatives

Alternatives B1, B2A, B3, and B3 - 114th Design Option would avoid impacts on the Winters House during project operation. While these alternatives encroach on the larger parcel on which the Winters House is located, no impact within the delineated historic boundary of the house would occur because these alternatives limit expansion of Bellevue Way to the existing right-of-way line at the Winters House. Alternatives B1 and B2A are located at-grade in the center of the roadway; and no visual, noise, or vibration impacts would result. Alternative B2E is elevated to the far side of Bellevue Way, away from the Winters House, also avoiding impacts on the property. Given its similar route and design to Alternative B2A, Alternative B3 and the B3 - 114th Design Option would also avoid impacts to the resource.

Pilgrim Lutheran Church

Preferred 112th SE Modified Alternative (B2M)

Preferred Alternative B2M would not impact the Pilgrim Lutheran Church.

Other Segment B Alternatives

Alternative B1 is not anticipated to impact the Pilgrim Lutheran Church, which is located just west of Bellevue Way (Exhibit D-10). This church building is eligible for the NRHP as an example of Neo-Expressionist architectural style; its eligibility does not include the property boundary. During construction, South Bellevue Way would be realigned up to 10 feet into the property for a distance of roughly 250 feet. The location already experiences the visual and noise effects of heavy street traffic. During construction, an underground stormwater detention vault would be installed under a portion of the northeast corner of the property and over 100 feet away from the Church building. Access from SE 11th Street to the church would not be disrupted from either project construction or operation. Following construction, all parking would be returned, and the vault would not be visible other than one or two manholes. Continued operation and maintenance of this stormwater vault would not impact the Pilgrim Lutheran Church. Maintenance would consist of periodically parking a truck at the site and opening the manholes for cleaning and maintenance, and maintenance could be scheduled to avoid major events and regular church services.

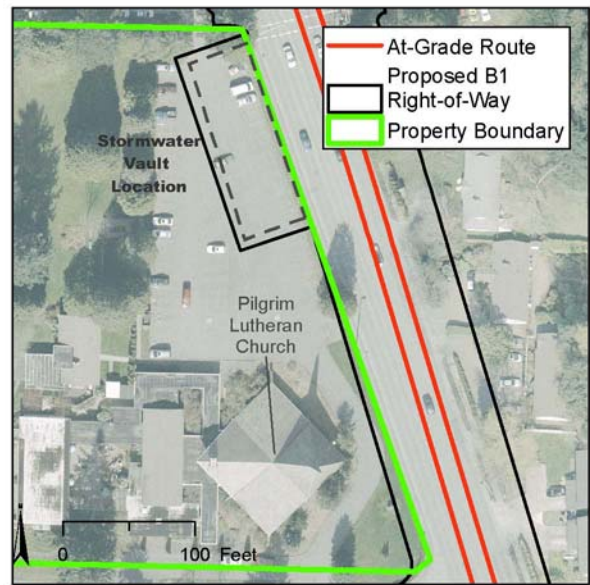


EXHIBIT D-10

Proximity of Alternative B1 to Pilgrim Lutheran Church

D.4.2.3 Segment C

Surrey Downs Park

Preferred 108th NE At-Grade Alternative (C11A)

Surrey Downs Park includes two athletic fields, a play structure, internal trails, open space, remnant stands of filbert or hazelnut trees, and the King County Courthouse and associated parking. Approximately 8.9 acres of the 11.4-acre site are currently used as park, with the remainder occupied by the King County Courthouse and parking. In March 2009, the City of Bellevue adopted a master plan for redeveloping the park, including the portion currently occupied by the King County District Courthouse. Proposed improvements include new baseball fields, open space, a community garden, parking, and a recreational building.

Preferred Alternative C11A could have potential impacts to Surrey Downs Park. Along 112th Avenue SE, *Preferred Alternative C11A* would acquire approximately 0.5 acre along the eastern edge of Surrey Downs Park for the light rail guideway (shown in Table D-3 and illustrated on Exhibit D-11). This area of the park is characterized by a steep slope and trees, a vehicle access at the southern and northern ends of the park, parking lots just west of the slope accessing the park facilities and the King County Courthouse building, a neighborhood pedestrian access point at the southeast corner of the park at 111th Avenue SE, and a pedestrian access from 112th Avenue SE at the park's northeast corner.

TABLE D-3

Segment C Alternatives Impact Area in Surrey Downs Park^a

Alternative	Permanent (acres)	Temporary (acres)
<i>Preferred Alternative C11A</i>	0.5 ^a	0.6 ^a
<i>Preferred Alternative C9T</i>	0.5 ^a	0.5 ^a
Alternative C1T	None	None
Alternative C2T	Less than 0.1 ^a	5.7 ^a
Alternative C3T	Less than 0.1 ^a	5.7 ^a
Alternative C4A	0.5 ^a	0.4 ^a
Alternative C7E	0.4 ^a	0.4 ^a
Alternative C8E	None	None
Alternative C9A	None	Less than 0.1
Alternative C14E	None	None

^aOnly for connector from *Preferred Alternative B2M* for *Preferred Alternatives C11A* and *C9T* and from *Alternative B2A* for *Alternatives C2T, C3T, C4A, and C7E*..

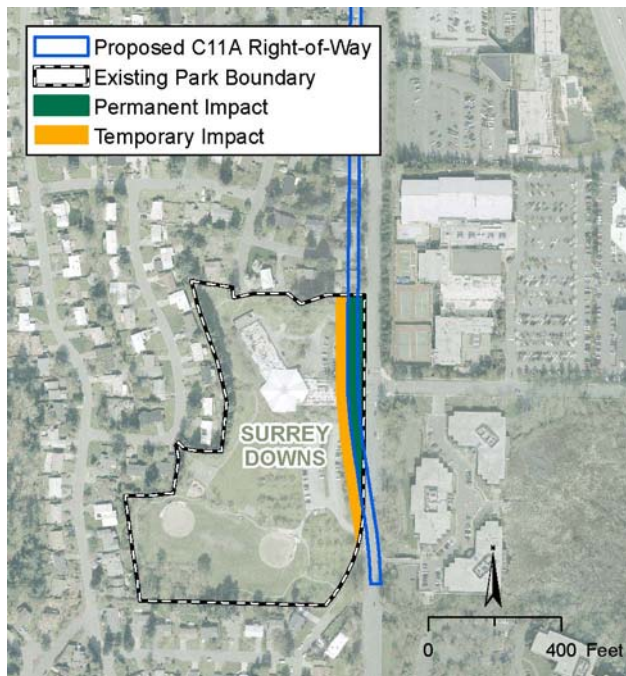


EXHIBIT D-11

Preferred 108th NE At-Grade Alternative (C11A)
Surrey Downs Park Impact Area

The at-grade light rail guideway would encroach along the eastern edge of park, displacing the landscaping strip, large trees, and some existing parking. As part of the project, properties located to the west of 112th Ave SE between Main Street and Surrey Downs Park would be acquired. Once the project is built and in operations, a substantial amount

of the acquired area will be available and could be developed into an open space linear park. This new linear park would replace the impacted area in Surrey Downs Park, which is primarily passive open space. The project would not result in noise impacts to the park because, based on FTA criteria, the actual uses of this park are not noise sensitive. Refer to Section 4.7, Noise and Vibration, for complete information. The vehicle access point at the north end of the park would be closed, consistent with the proposed master plan. The existing vehicle access at the southern end and the pedestrian connection to the neighborhood at the southeast corner at 111th Avenue SE would not be affected. Design improvements to the south driveway would minimize impacts associated with the removal of the north driveway. Vehicle access to the park would also be right-in and right-out along 112th Avenue SE. U-turn movements would be provided at nearby intersections to minimize out of the way travel for vehicles that access the park north along 112th Avenue SE. No active recreation facilities would be affected.

Removing vegetation and trees would result in a visual change, but the vegetation would be replaced and eventually mature. The light rail guideway would be consistent with the existing transportation nature of the 112th Avenue SE corridor. *Preferred Alternative C11A* would also temporarily acquire 0.6 acre for a temporary construction easement. Construction impacts such as noise, dust, visual change, and reduced parking would be noticed by park users but would not inhibit normal use of the park. There are no active park use areas along 112th Avenue SE. Vehicle and pedestrian access to the park from 112th Avenue SE would be maintained during construction. The activities, features, and attributes of the park would not be substantially diminished.

Preferred Alternative C11A would affect some elements of the current *Surrey Downs Park Master Plan* adopted by the Bellevue City Council in March 2009. The light rail guideway would encroach into the planned garden terraces and path bordering 112th Avenue SE. *Preferred Alternative C11A* would relocate or eliminate the proposed pedestrian access points from 112th Avenue SE at the park's northeast corner.

The project would minimize impacts during operation and construction by using the area of the park not currently used for active recreation along 112th Avenue SE, limiting permanent light rail use to approximately 4 percent of the park. Sound Transit would coordinate with the City of Bellevue to revise the *Surrey Downs Park Master Plan* before the park is

developed to address the light rail and integrate the two facilities, as appropriate.

Preferred 110th NE Tunnel Alternative (C9T)

As illustrated on Exhibit D-12, *Preferred Alternative C9T* would permanently acquire approximately 0.5 acre of Surrey Downs Park (approximately 4 percent of the park) along its northeast boundary along 112th Avenue SE for the at-grade light rail guideway, and realign SE 4th Street to create a four-way intersection with SE 6th Street and 112th Avenue SE (see Table D-3). Similar to *Preferred Alternative C11A*, the north vehicle entrance to the park would be closed. This area of the park is characterized by a steep slope and trees along 112th Avenue SE, a vehicle entrance, and parking lots accessing the park facilities and the King County Courthouse building. As part of the project, properties located to the west of 112th Ave SE between Main Street and Surrey Downs Park would be acquired. Once the project is built and in operations, a substantial amount of the acquired area will be available and could be developed into an open space linear park. This new linear park would replace the impacted area in Surrey Downs Park, which is primarily passive open space.

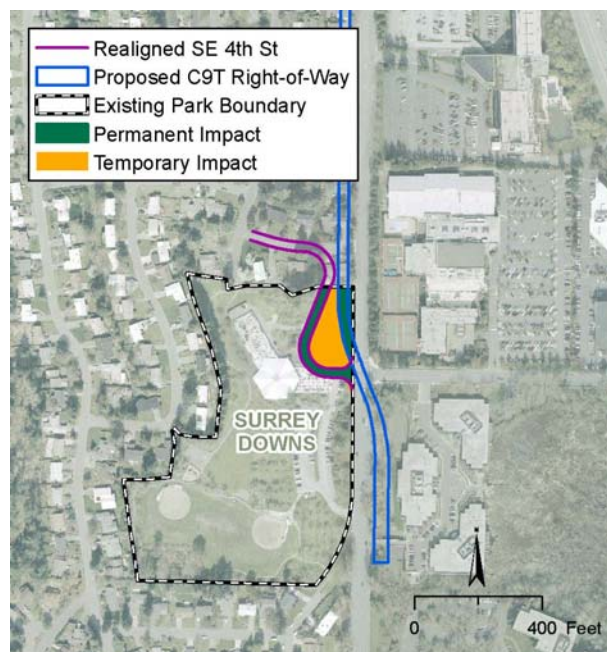


EXHIBIT D-12
Preferred 110th NE Tunnel Alternative (C9T)
Surrey Downs Park Impact Area

There would be no noise impacts, similar to *Preferred Alternative C11A*. Park impacts at the northeastern portions of the resource would be similar to those from *Preferred Alternative C11A*, but there would be no impacts on the park south of SE 6th Street where *Preferred Alternative C9T* would remain on the east side

of 112th Avenue SE. *Preferred Alternative C9T* would realign SE 4th Street to replace the neighborhood access with a four-way intersection with SE 6th Street and 112th Avenue SE. The roadway would result in permanent use of park property for the roadway separating a half-acre area from the remainder of the park. The curved design of the realigned roadway would maintain slow vehicle movements through the park and would not access the parking areas for the park. A second option would provide a new connection into the Surrey Downs neighborhood at SE 9th Street from the south park entrance. Access to the neighborhood from the south park entrance would permanently close the north entrance reducing park impacts, but it would result in changing circulation patterns in the neighborhood. No active recreation facilities would be affected under either option.

This alternative would temporarily acquire 0.5 acre for a temporary construction easement. Construction impacts such as noise, dust, and visual change would be noticed by park users but would not inhibit normal park use because there are no active park use areas along 112th Avenue SE. Vehicle and pedestrian access to the park from 112th Avenue SE would be maintained during construction. The activities, features, and attributes of the park would not be substantially diminished.

Preferred Alternative C9T would affect elements of the *Surrey Downs Park Master Plan* and would result in impacts similar to *Preferred Alternative C11A* at the northeastern side of the park, including encroachment of light rail into the planned garden terraces and path bordering 112th Avenue SE. In addition, realigning SE 4th Street would further encroach into a portion of the area planned for the community facility. *Preferred Alternative C9T* would relocate or eliminate one of the two proposed pedestrian access points, with the access point at SE 6th Street combined with the realigned SE 4th Street access to the park.

Minimization measures are similar to those discussed for *Preferred Alternative C11A*, with the addition of landscaping along the realigned SE 4th Street adjacent to the park. Sound Transit will coordinate with the City of Bellevue to initiate revision of the *Surrey Downs Park Master Plan* before park development to address the light rail guideway, roadway, and needed parking and integrate the two facilities, as appropriate.

Other Segment C Alternatives

The other Segment C alternatives would also not result in noise impacts from light rail operations at Surrey Downs Park. A narrow strip of permanent acquisition would occur along the eastern edge of Surrey Downs Park when the Alternative C2T, C3T,

C4A, and C7E connect to Alternative B2A, but this area would not conflict with the Surrey Downs Park Master Plan. These alternatives would require widening the right of way along 112th Avenue SE for the light rail project. The area needed for each alternative is shown in Table D-3 and depicted in Exhibit D-13.

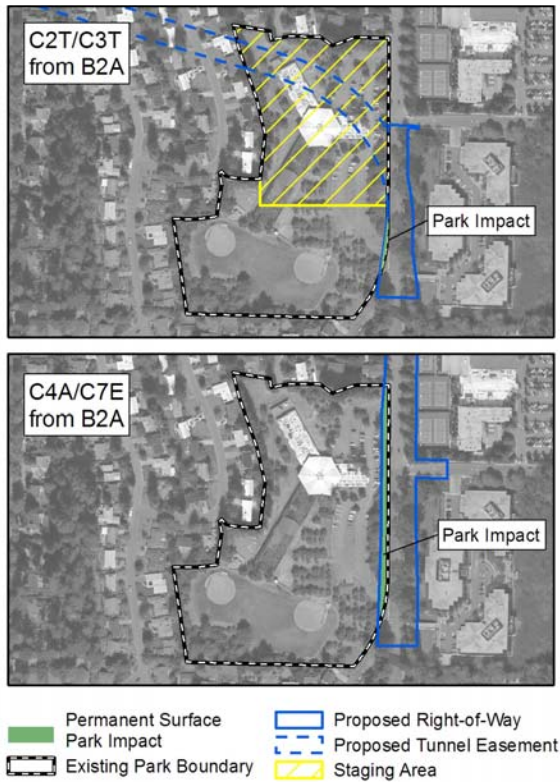


EXHIBIT D-13

Surrey Down Park Proposed Right-of-Way and Staging Areas in Segment C

The affected area constitutes about 0.5 to 4.4 percent of the 11.4-acre park, depending on the alternative. The direct use would reduce the landscaped strip of land that separates the existing parking area from the sidewalk along 112th Avenue SE. This use does not affect active recreational areas of the park and therefore would not result in adverse impacts on the activities, features, and attributes of the facility.

Constructing Alternative C2T or C3T that connect with the Alternative B2A would require closing the northern half of the park (the District Court House portion of the park), about 5.7 acres, for approximately 4 to 5 years to stage and construct the tunnel. This would be unique for Alternative C2T or C3T when connecting from Alternative B2A. This area of the park is not currently used as a park or recreational facility. The southern half of the park, containing ball fields and existing active park uses, would remain open and functional during construction. Parking and

pedestrian access would be maintained during construction. A net benefit to the overall park facility from only Alternative C2T and C3T is expected to occur as a result of the removal of the District Court House by the East Link Project, if it is not already relocated before project construction begins. The removal might facilitate implementation of the Surrey Downs Park Master Plan. However, depending on park development schedule, the construction staging at this location might delay implementation of this park plan. Following construction, the tunnel would be underground and not visible within the park.

Although the southern half of the park would remain open during construction of Alternatives C2T and C3T, park users would experience impacts from adjacent construction. These impacts would include noise, dust, and some access restrictions because vehicle access would be limited to only one of the two current entrances. Pedestrian access to adjoining neighborhoods would be maintained at two of the three current locations. Parking would be limited because approximately half of the parking is located at the north end of the site, although much of that parking serves the District Court House.

NE 2nd Pocket Parks

Preferred 110th NE Tunnel Alternative (C9T)

Preferred Alternative C9T would impact the NE 2nd Place Pocket Park during project operation and construction (as shown in Table D-4 and Exhibit D-14). The park comprises green space at the four quadrants of the intersection of 110th Avenue NE and NE 2nd Place, which serve as visual green space but do not include any facilities. The City of Bellevue, however, would like to develop these areas as a neighborhood park (City of Bellevue, 2010).

TABLE D-4

Segment C Alternatives Impact Area in NE 2nd Pocket Park

Alternative	Permanent (acres)	Temporary (acres)
<i>Preferred Alternative C11A</i>	None	None
<i>Preferred Alternative C9T</i>	0.1	0.3
Alternative C1T	None	None
Alternative C2T	None	None
Alternative C3T	None	None
Alternative C4A	0.1	0.3
Alternative C7E	None	None
Alternative C8E	0.1	0.1
Alternative C9A	Less than 0.1	0.1
Alternative C14E	None	None

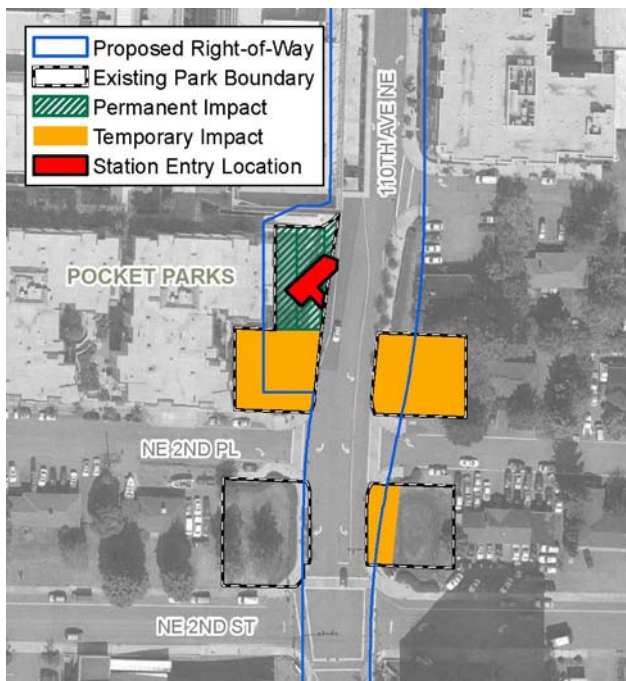


EXHIBIT D-14
Preferred 110th NE Tunnel Alternative (C9T) Pocket Park Impact Area

A portion of the northwest quadrant of the park, approximately 0.1 acre, would be incorporated into a station entrance and developed as an outdoor public plaza. A tunnel easement would be acquired under the northeast and southeast quadrants of the park, and the area above the tunnel would be returned to park use after construction. Although *Preferred Alternative C9T* would be in a tunnel the station entrance would be visible, but would not result in any permanent visual impacts.

Construction activities associated with the cut-and-cover tunnel for *Preferred Alternative C9T* would require the use of both park quadrants on the east side of 110th Avenue NE and the northwest quadrant, for a total construction easement of approximately 0.3 acre. The northwest and northeast quadrant would be closed during construction with the northeast quadrant being used as part of a larger staging area. Park users would experience noise, dust and visual change. After construction, the NE 2nd Place Pocket Park would be more accessible to the public through the station plaza.

Other Segment C Alternatives

The Couplet Alternative (C4A) would intrude into the southwest quadrant of the Pocket Park roughly 10 to 15 feet to accommodate the additional right-of-way required for the northbound light rail trackway (Exhibit D-15). This would acquire and use directly 0.1 acre or less than 10 percent of the total park area. Because this park contains no facilities and serves

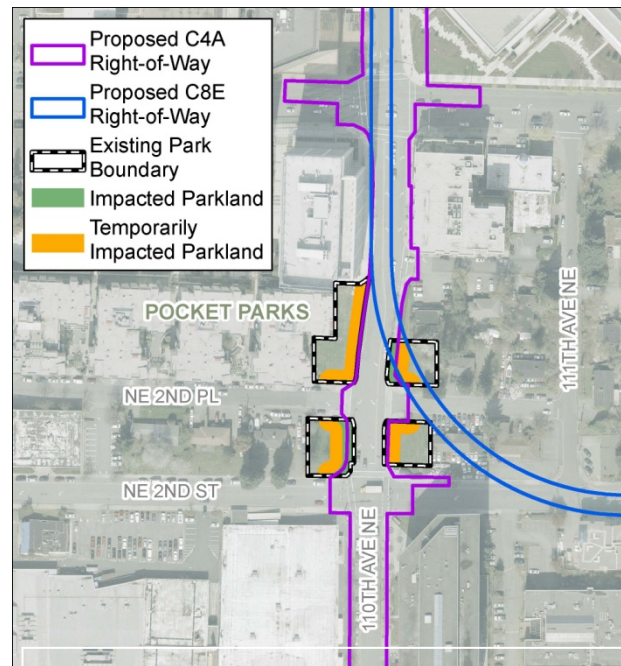


EXHIBIT D-15
Alternatives C4A and C8E Pocket Park Impact Area

principally as open space, this park could continue to operate as it does currently.

Given its current use and proximity to roadway traffic and bus routes that use 110th Avenue NE, no noise or visual impacts are expected to occur. During construction, portions of all four quadrants would be affected, but remaining areas would still be available for use (Exhibit D-15). In addition, the 110th NE Elevated Alternative (C8E) would pass over 0.1 acre of the northeast quadrant of the Pocket Park (approximately 2,100 square feet), requiring a permanent easement and resulting in shading of the park and a visual intrusion (Exhibit D-15). The northeast quadrant of the park would be closed during construction because the area would be used for staging. However, because this park contains no recreational facilities and serves principally as open space, it is expected that this park could continue to operate as it does currently. Alternative C9A would permanently acquire less than 0.1 acre of the western edge of the Pocket Park quadrants on the east side of 110th Avenue NE (Exhibit D-16). During construction of Alternatives C4A, C8E, or C9A, park users might experience increased noise, dust, and temporary access restrictions in the pocket parks.

McCormick Park

Preferred 108th NE At-Grade (C11A) and Preferred 110th NE Tunnel (C9T) Alternatives

Preferred Alternative C11A and Preferred Tunnel Alternative C9T would not impact McCormick Park.

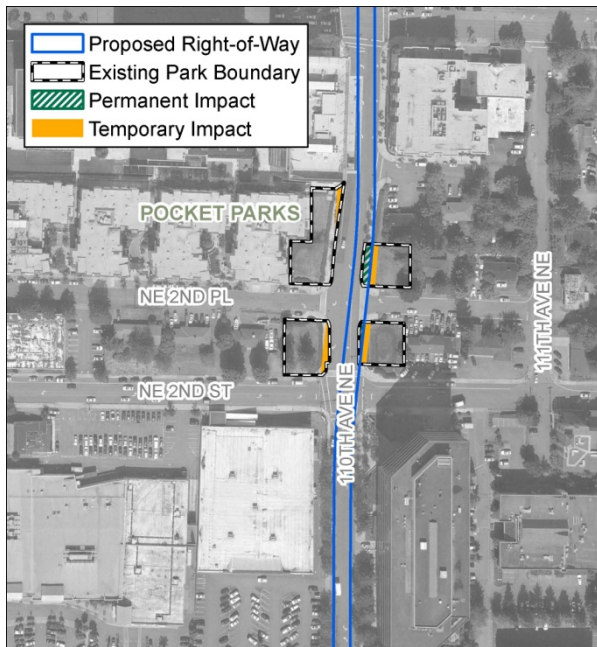


EXHIBIT D-16
Alternative C9A Pocket Park Impact Area

Other Segment C Alternatives

Alternatives C3T, C4A, and C8E would acquire and directly use McCormick Park as shown in Exhibit D-17 and Table D-5. No noise impacts would occur from any alternative as the park is not noise sensitive.

Under the 108th NE Tunnel Alternative (C3T), the eastern portion of McCormick Park would include the portal and light rail structure along NE 12th Street. A retained fill or transition structure (gradual in height and approximately 550 feet long) would support the light rail track as it transitions from a tunnel to aboveground profile, impacting 0.6 acre of the park. This would result in a much different user experience than exists today as a result of additional structures in the park. Much of the construction would occupy and remove the existing mature evergreen trees along the north edge of the park. Once complete, the area used for construction staging as well as the area above the underground tunnel from roughly 108th Avenue NE to 110th Avenue NE would be used to recreate the parkland, resulting in an overall increase of the park size by about 1 acre.

With the Couplet Alternative (C4A), impacts would be similar to those described under Alternative C3T, although Alternative C4A would have a longer section of trackway in the park and a structure transitioning into an elevated profile over 112th Avenue NE. Approximately 0.5 acre of park would be impacted at the surface, and 0.3 acre would be under the elevated guideway.

TABLE D-5
Impacts on McCormick Park

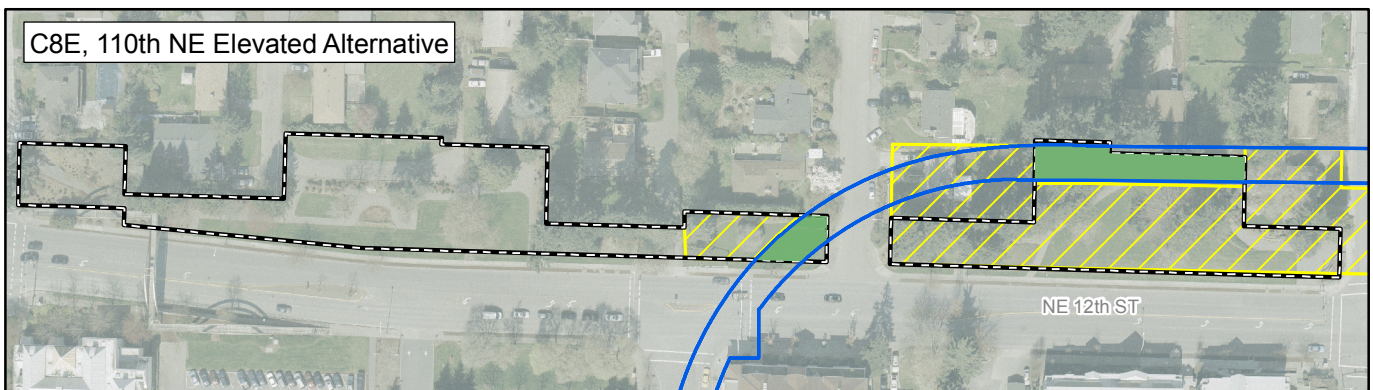
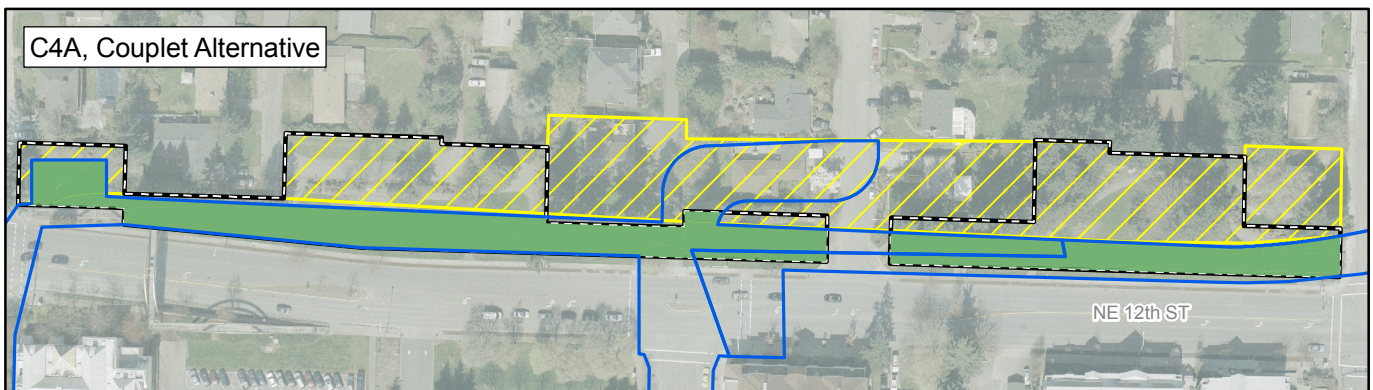
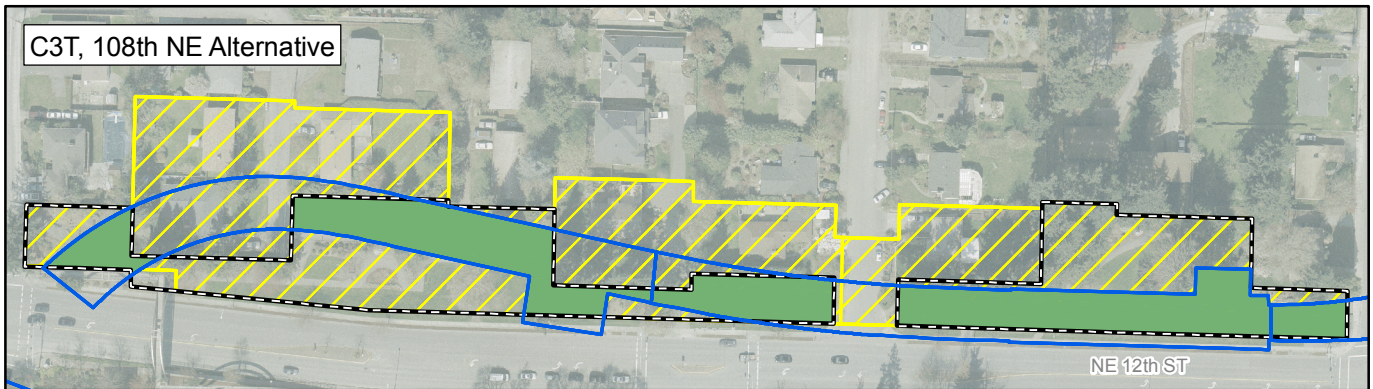
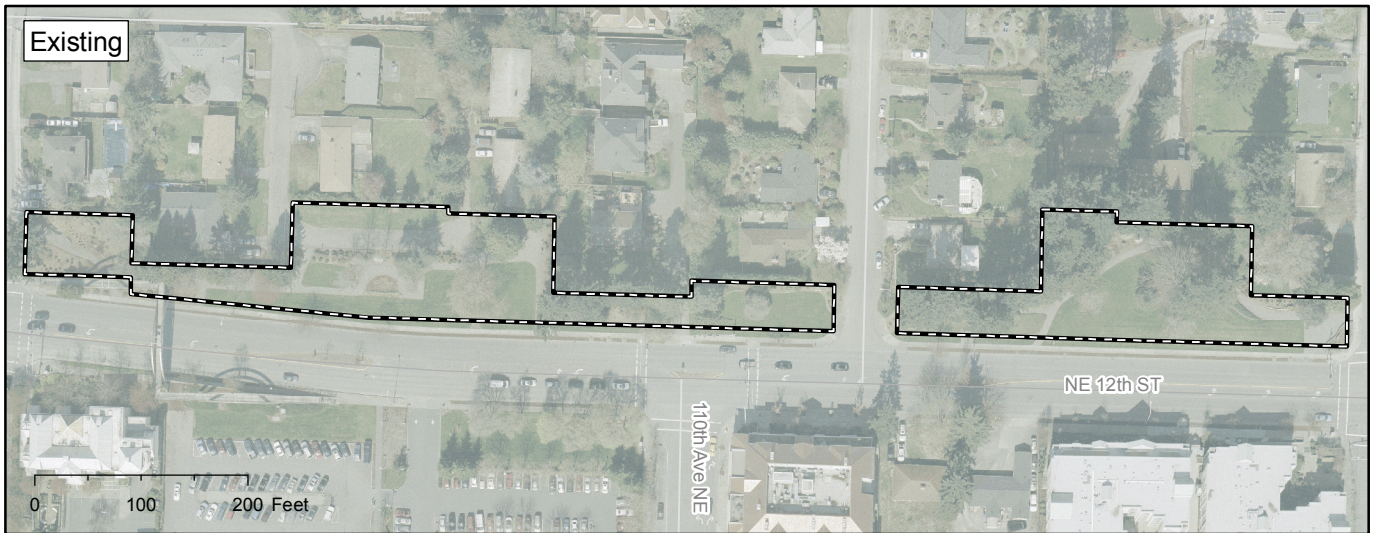
Alternative	Impact Area (acres)	Additional Area for Construction Staging (acres) ^a	New Parkland/ Net Gain (acres)
<i>Preferred C11A</i>	None	None	None
<i>Preferred Tunnel C9T</i>	None	None	None
Alternative C1T	None	None	None
Alternative C2T	None	None	None
Alternative C3T	0.9	1.8	1.6/0.7
Alternative C4A	0.8	1.3	1.1/0.2
Alternative C7E	None	None	None
Alternative C8E	0.2	0.8	0.4/0.1
Alternative C9A	None	None	None
Alternative C14E	None	None	None

^a Includes park and nonpark areas.

Also similar to Alternative C3T, construction would occupy the park and remove the mature trees. The area used for construction staging would be used to recreate the parkland when construction is finished. The ultimate configuration of the park would increase in size by approximately 0.2 acre.

With the 110th NE Elevated Alternative (C8E), the elevated profile would cross NE 12th Street over the park and pass over 0.2 acre of the northern edge of the park between 111th Avenue NE and 112th Avenue NE. Because the light rail structure would be elevated approximately 30 feet above the park in this area, the structure would become a dominant and noticeable feature, which would affect the visual environment for some park users. However, no access would be impeded to and from other portions of the park. Only a portion of the park and some of the mature trees would be affected by construction. Like Alternatives C3T and C4A, once construction is complete, the area used for construction staging would be used to recreate the parkland and the park would slightly increase in size. Alternative C8E would result in the least impact of the three alternatives affecting McCormick Park.

Under each of these alternatives, the new park vegetation would take several years to mature, and, until the vegetation is reestablished, a temporary change in visual quality for park users would occur as well as a reduction in the ability of the park to function as a buffer from adjacent uses. The primary



- Proposed Right-of-Way
- Staging Area / Future Park Boundary
- Affected Park Area Within Proposed Right-of-Way
- Existing Park Boundary

Exhibit D-17 McCormick Park - Proposed Right-of-Way and Staging Areas Segment C
East Link Project

purpose of McCormick Park to serve as a buffer between the residences of the Northtowne Neighborhood to the north and high-density residential and commercial areas to the south would ultimately be restored. Constructing the alternatives would close McCormick Park from 108th to 112th Avenue NE with Alternatives C3T and C4A and from approximately 110th to 112th Avenue NE with Alternative C8E for approximately 4 to 5 years.

Potential Surrey Downs Historic District

There is no direct use of the potential Surrey Downs Historic District under any of the East Link Alternatives. However, in coordination with the State Historic Preservation Office, a concern for the possibility of proximity impacts on the potential historic district of the construction and staging areas, therefore the constructive use test is applied as described in Section D.3.3 and per 23 CFR 771.135.

A series of homes in Surrey Downs has the potential to be eligible for the NRHP as a historic district because they are part of a distinctive residential subdivision developed during the period 1952-1956; many of the houses represent a Pacific Northwest regional variant of the Modern architectural design style of post-World War II residential architecture; a number of the houses are based on the designs of a prominent Seattle architectural firm Mithun & Nesland (now Mithun Partners); and the neighborhood retains a high degree of design unity and cohesiveness. Although the owners have altered many of these houses – some substantially – since then, the neighborhood retains an unusual degree of design quality and cohesiveness.

While the potential district has not been fully delineated, there are 18 houses inventoried within the study area including one-story houses with carports and two-story houses with garages located beneath the living space. Properties that contribute to the potential historic district feature open plans, large areas of glass, and extensive use of wood. Hardwood floor and exposed beams characterize the house interiors, while the exteriors show wood siding, exposed rafters, and wooden roof supports. Skylights supplement the windows, which are plentiful and large, maximizing the amount of light admitted. All of these factors contribute to the unity of design and quality that distinguishes this portion of the subdivision.

Preferred 108th NE At-Grade Alternative (C11A)

When connecting from B2M, C11A would only remove noncontributing properties along 112th Avenue SE, Main Street, and one property along 111th Avenue SE (Exhibit D-18). Connections from B3 or B7 would not require the removal of homes along 112th Avenue SE.

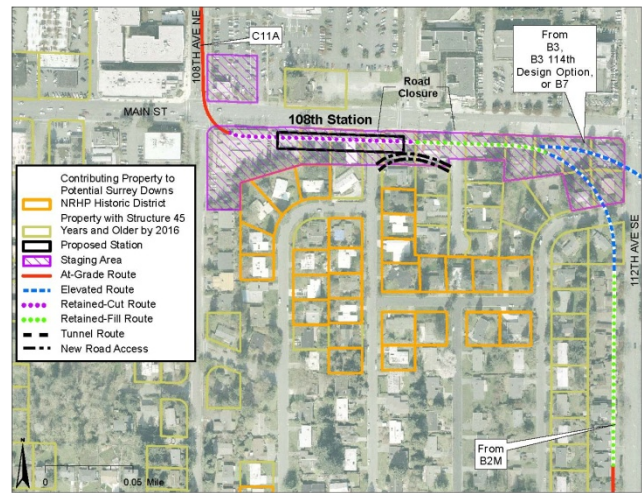


EXHIBIT D-18
Proximity of Preferred Alternative C11A to
Potential Surrey Downs Historic District

At least one row of noncontributing properties would remain between the contributing properties and the project along 112th Avenue SE and most of Main Street. The project would be adjacent to three contributing homes at Main Street and 108th Avenue.

The potential historic district's setting would not be directly affected by the removal of noncontributing properties and the 108th Station and trackway along Main Street. Due to the orientation away from Main Street, the impact would not alter the sense of the potential historic district neighborhood.

Operating Preferred Alternative C11A could have potential moderate noise impacts on three contributing properties in the northwest portion of the potential district, located south of the proposed station; however, these noise impacts would be minimized and avoided with a sound barrier in the form of a berm or wall, included along the 112th Avenue SE and Main Street portions of the project. During final design, Sound Transit would assess whether or not the existing large coniferous trees located next to the contributing properties near the 108th Station could be preserved, which is Sound Transit's intention. Project components such as station design, landscaping, and a sound barrier would minimize project visual and noise effects, create a buffer from the project, and enhance the neighborhood boundary where noncontributing properties would be removed. Additionally, there would be no vibration after mitigation. Therefore there would not be substantial vibration or noise interference with the residential use of the properties under operation nor would any of the aesthetic features or attributes of the neighborhood be impaired.

Preferred Alternative C11A would close SE 4th Street access to 112th Avenue SE. However, SE 1st Place would remain open, maintaining access to 112th Avenue SE for the neighborhood north of Surrey Downs Park. Direct physical intrusion from the adjacent urban traffic would be substantially minimized under *C11A* because it would also close 110th Avenue SE and 110th Place access to Main Street; alternate access points to the neighborhood from Main Street via 108th Avenue SE would continue to provide access. Therefore the utility of the potential historic district is maintained for its residents.

Operation of *Preferred Alternative C11A* would not substantially diminish the attributes, features or qualities that are protected under Section 4(f) and therefore no constructive use would result from operation of *C11A*.

The construction effects of *Preferred Alternative C11A* would be temporary, and would not impact historic structures or substantially diminish the residential use during construction. The *C11A* construction impacts would be temporary, lasting about five years overall, with the most intense construction activities (demolition, clearing, and heavy construction) occurring during the first couple years. Construction activities could result in noise, visual, and dust impacts on nearby residences. Construction truck traffic would use the Main Street and 112th Avenue SE arterials without passing through the potential historic district. Typical construction for guideways and stations would occur on a 5- to 6-day work week schedule and would occur primarily between the hours of 7 a.m. and 10 p.m. In some locations (such as when street detours are involved and/or daytime construction periods need to be abbreviated to reduce impacts), additional shifts, all-week, or nighttime construction activities could be necessary.

Sound Transit would, as practical, limit construction activities that produce the highest noise levels to daytime hours, or when disturbance to sensitive receivers would be minimized. Contractors would be required to meet the criteria of the noise ordinance for the city and would seek the appropriate noise variance for operation of construction equipment that could exceed allowable noise limits during nighttime hours (between 10:00 p.m. and 7:00 a.m.), on Sundays or legal holidays. Sound Transit would control nighttime construction noise levels by applying noise level limits and noise control measures to meet these noise limits.

To minimize and avoid effects of construction on the potential Surrey Downs Historic District, construction of *Preferred 108th NE At-grade Alternative (C11A)* would include installation of a solid construction barrier to

shield adjacent eligible houses from construction and preservation of the evergreen trees along the south edge of the station area, east of 108th Avenue SE. The residences would not experience noise that would substantially interfere with the residential uses.

During construction, the properties that would be removed for the project right-of-way along Main Street would also be used for staging areas. Staging is a relatively low intensity activity compared with construction. Construction staging areas are needed before, during, and for a short time after construction work occurs to store construction equipment, store construction materials, and to give contractors a temporary location to meet and work near the construction site. Staging areas may include contractor trailers (which would act as temporary offices and places for contractors to meet) and construction crew parking. In some circumstances, staging can provide additional buffer for adjacent properties during construction. The period of construction would be not lower the livability of the existing neighborhood.

The construction phase of *Preferred Alternative C11A* would not result in noise, visual, or access limitations that would substantially diminishing the attributes, features or qualities that are protected under Section 4(f) and therefore no constructive use would result on the potential Surrey Downs Historic District.

Preferred 110th NE Tunnel Alternative (C9T)

Preferred 110th NE Tunnel Alternative (C9T) would not be adjacent to any contributing properties of the potential historic district. It would remove one row of noncontributing properties along 112th Avenue SE and one to two rows of noncontributing properties at the northeast corner of the neighborhood where 112th Avenue SE meets Main Street when connecting to *Preferred Alternative B2M* (Exhibit D-19). Fewer noncontributing properties would be removed along Main Street as compared with *C11A* because *C9T* enters a tunnel on the south side of Main Street and turns north to tunnel under 110th Avenue NE.

The *Preferred Alternative C9T* would not affect any contributing properties in the potential NRHP-eligible Surrey Downs historic district during construction. This alternative would be far enough away from contributing properties to avoid an adverse impact during construction. *Preferred Alternative C9T* would not result in noise, vibration, or visual impacts or access limitations that would substantially diminishing the attributes, features or qualities that are protected under Section 4(f) and therefore no constructive use would result on the potential Surrey Downs Historic District.

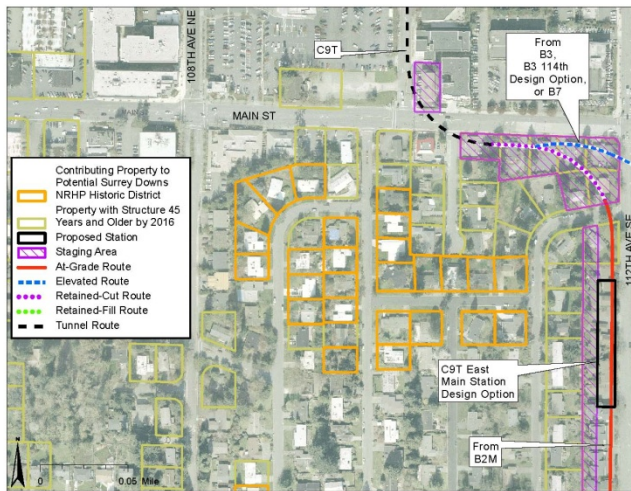


EXHIBIT D-19
Proximity of *Preferred Alternative C9T* to Potential Surrey Downs Historic District

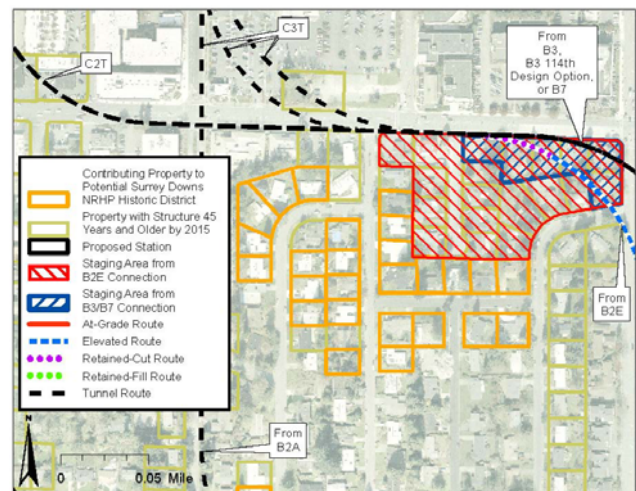


EXHIBIT D-20
Staging Area for Connections from Alternative B2E vs. Alternatives B3 and B7 for Alternatives C2T and C3T

Other Segment C Alternatives

Alternative C9A would be similar to *Preferred Alternative C9T* in that it would be far enough away from the potential Surrey Downs Historic District that it would not result in noise, vibration, or visual impacts, or access limitations that would substantially diminishing the attributes, features or qualities that are protected under Section 4(f). Therefore Alternative C9A would not result in a constructive use of the potential Surrey Downs Historic District. Likewise, Alternatives C2T and C3T with connections from Alternative B3 or B7, respectively, would not result in constructive use of the potential Surrey Downs Historic District because the construction areas are similar to *Preferred Alternative C9T* and Alternative C9A.

The connector from Alternative B2A to C2T and C3T would involve boring a tunnel beneath the potential Surrey Downs Historic District, which would avoid access and visual impacts. Noise and possible vibration could be noticeable to residents during construction but would not affect the contributing buildings. Although the geotechnical analysis shows that the soils in this area are generally resistant to settlement from ground disturbance, precautions during construction and a careful monitoring program would be incorporated into the construction plan.

The connector from Alternative B2E to C2T and C3T would use the northern area of the Surrey Downs subdivision for construction staging at the tunnel portal whereas if C3T connects from B3 or B7, the staging area would displace fewer homes and be further away from contributing residences (Exhibit D-20). The staging area activities for C3T from

B3E would be the same as described for C11A and C9T, consisting of storing materials and parking. Construction would alter access at times during construction and would produce visual, noise, dust, and possible vibration impacts. Upon implementing the avoidance and minimization measures during construction, the impacts would be temporary and would not affect historic structures nor the livability of the neighborhood. The temporary or operational phases of these alternatives would not result in noise, esthetic, vibration impacts or access limitations that would substantially diminishing the attributes, features or qualities that are protected under Section 4(f) and therefore no constructive use would result on the potential Surrey Downs Historic District.

For connectors from Alternatives B2A and B2E to Alternative C4A (Exhibit D-21), construction staging areas would affect similar properties as *Preferred Alternative C11A*. Construction would alter access at times during construction and would produce visual, noise, dust, and possible vibration impacts. For connectors from Alternative B3 and B7 to Alternative C4A, construction staging would involve a smaller area but would still be adjacent to portions of the potential Surrey Downs Historic District. Constructing the connectors to Alternative C4A would be shorter in duration and require less nighttime construction than construction for tunnel alternative, such as Alternatives C2T and C3T and *Preferred Alternative C9T*.

There would be no effect on the potential Surrey Downs Historic District for connectors from Alternatives B3 and B7 to Alternative C7E, C8E, or

C14E. Each alternative is located far enough away from the Surrey Downs subdivision to have no

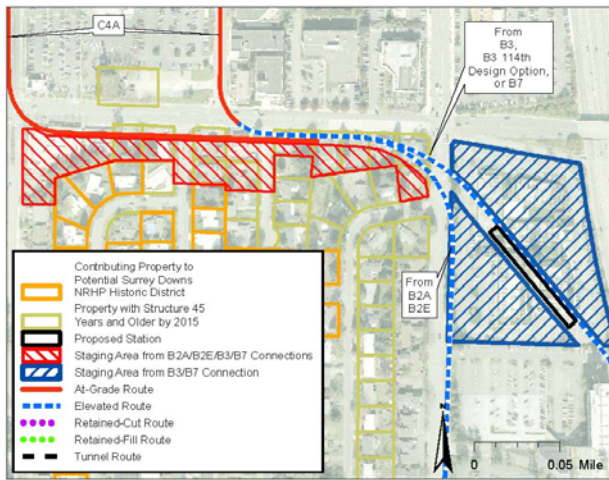


EXHIBIT D-21
Staging Area for Connections from Alternative B2E vs.
Alternatives B3 and B7 for Alternative C4A

impacts on the resources within it. For all alternatives that do border the potential Surrey Downs Historic District, Sound Transit would apply minimization and avoidance measures as previously described under *Preferred Alternative C11A*. After construction, the area would be landscaped offering a physical buffer separating the neighborhood and the downtown urban area. As with the preferred alternatives, none of the alternatives would result in substantially diminishing the attributes, features or qualities that are protected under Section 4(f) during operation or construction and no constructive use.

D.4.2.4 Segment D

Alternative D3 would use a narrow strip of the parcel on which the former Bellevue Fire Station sits (Exhibit D-22). The alternative would not result in visual, noise, vibration, or other impacts on the property. Widening of the road and introduction of the retained-cut light rail would not impact the setting, which is characterized by major roadways: Bel-Red Road, 148th Avenue NE, and NE 20th Street. Although the building's parcel is situated inside the Area of Potential Effect (APE), the building itself is outside the APE and not affected by the roadway widening during operation or construction.

D.4.2.5 Segment E

There are six parks, open spaces, and recreation areas potentially impacted by Segment E alternatives (Table D-6).

Marymoor Park

Preferred Marymoor Alternative (E2)

Preferred Alternative E2 would encroach about 30 feet into the northern boundary of the 640-acre Marymoor Park, acquiring and using approximately 2.0 acre of the total park area (Exhibit D-23).

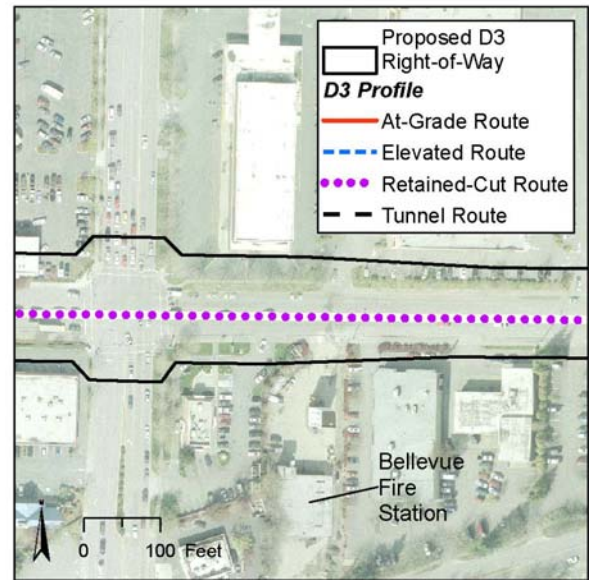


EXHIBIT D-22
Alternative D3 Former Bellevue Fire Station Impact Area

The Marymoor Park contains soccer fields, baseball fields, a velodrome, tennis courts, a recreational event center and a climbing rock nearby SR 520 and the *Preferred Alternative E2* alignment. No recreation facilities would be directly impacted by light rail operations; however, equestrians ride along the park's northern property boundary – an unofficial equestrian route.

The equestrian route might be relocated if there is not enough distance between the guideway and sports fields to accommodate the users. Given the existing proximity to SR 520, users would not likely experience additional proximity impacts. The project would not result in noise impacts based on FTA criteria, because the actual uses of this park are not noise sensitive. Sound Transit would evaluate potential noise impacts in accordance with FTA noise method and criteria when Segment E is funded and design advances.

Construction would acquire a temporary easement of 3.0 acres along the northern park boundary to accommodate an access road and construction staging. This area consists of an approximately 15- to 50-foot width of property for the length of the park along SR 520. The temporary construction area would be sited to avoid impacts on those recreational activities closest to the alignment, specifically the soccer fields, event area and the velodrome and, thus, would not affect these recreational functions. However, this area is used as an unofficial equestrian route, which would have to be temporarily rerouted if there is not enough distance between the construction area and the soccer and ball fields to accommodate these users.

TABLE D-6
Permanent Impacts on Parks and Open Spaces in Segment E

Impact Area: (acres)	Park Name						
	Town Center Open Space	Luke McRedmond Landing	Marymoor Park	Sammamish River Trail	East Lake Sammamish Trail	Bear Creek Trail	The Edge Skate Park
<i>Preferred Marymoor Alternative (E2)</i>	None	None	2.0 acres	0 acre ^a	Shade, possible relocation of trail section	0.1 acre	None
E2 - Redmond Transit Center Design Option	None	None	2.0 acres	0 acre ^a	Shade, possible relocation of trail section	0.1 acre	Less than 0.1 acre
Redmond Way Alternative (E1)	None	0.1 acre	None	0.1 acre	Shade, relocation of trail section with MF 5 only	0.1 acre	None
Leary Way Alternative (E4)	0.7 acre	None	None	0.1 acre	Shade, relocation of trail section with MF 5 only	0.1 acre	None

^a Impacts to this trail for Preferred Alternative E2, and E2-Transit Center Design Option are counted under Marymoor Park.

The project would not impair protected activities, features, or attributes of the park. E2 - Redmond Transit Center Design Option would have the same impacts as *Preferred Alternative E2*.

Luke McRedmond Landing

Preferred Marymoor Alternative (E2)

Preferred Alternative E2 and the E2 - Redmond Transit Center Design Option would not impact Luke McRedmond Landing.

Other Segment E Alternatives

The elevated portion of Alternative E1 would intrude into the park's northwest boundary, thereby acquiring and directly using 0.1 acre, or roughly 5 percent of the total park area, which would be under the elevated structure. This would remove mature trees lining Redmond Way, but no park facilities would be impacted. Because the light rail structure would be elevated approximately 30 feet above the park adjacent to Redmond Way, the structure would become a dominant and noticeable feature, which would affect the visual experience of park users. Trees would be replaced per the City of Redmond tree ordinance. During construction, park users would experience impacts from adjacent construction, including noise, dust, and potential access restrictions as materials are hauled to and from the site, and some parking spaces would be temporarily removed. However, there would be no impacts on the recreational functions of the park and no noise impacts because the actual uses of the park are not noise sensitive based on FTA criteria.

Sammamish River Trail

Preferred Marymoor Alternative (E2)

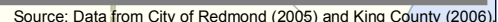
The *Preferred Alternative E2* would span the Sammamish River Trail south of SR 520, where it is part of Marymoor Park. This would result in an additional 20 feet

(approximately) of trail shading. This impact would not result in a permanent physical impact on the continued use of the trail, which already passes underneath three other overpasses in this area, one of which, SR 520, would be located 80 feet away. A column could be placed near the trail; however, the columns would more likely be placed in WSDOT right-of-way. Construction would require temporary trail detours to maintain trail usage. During construction, park users would experience impacts from adjacent construction, including noise and dust, however since the trail section is perpendicular to this crossing, the construction would not inhibit trail use and the construction would be a short duration of less than the construction for the project alternative.

A detour would be provided to allow for the continuity of the trail, and the trail would be fully restored following construction. E2 - Redmond Transit Center Design Option would have the same impacts as *Preferred Alternative E2*.

Other Segment E Alternatives

All Segment E Alternatives would be similar impacts as the *Preferred Alternative E2*. No direct use of the trail would occur under any of the alternatives. Alternative E1 would span two segments of the trail that run north-south on either side of the Sammamish River south of Redmond Way SE. This would result in additional shading of the trail for roughly 10 to 20 feet. However, it is not anticipated that this impact would impair the continued use of the trail, which already passes underneath three other overpasses in this area, including the SE Redmond Way overpass 30 feet away.



- Exhibit D-23 Affected Park Area
Within Proposed Right-of-Way
and Staging Areas
Segment E**
East Link Project

It is also likely that one or more columns would be placed in or in the vicinity of the trail (on either the west or east side of the river), given the turning radius and distance of the crossing of Alternative E1. This configuration might require the realignment of the trail such that no columns impede use of the trail.

Similar to Alternative E1, Alternative E4 would span two segments of the trail that run north-south on either side of the Sammamish River south of Leary Way. This would result in an additional 10 to 20 feet (approximately) of trail shading; however, it is not anticipated that this impact would impair the continued use of the trail, which already passes underneath three other overpasses in this area, including the Leary Way overpass directly adjacent to the proposed guideway. It is also likely that one or more columns would be placed in the vicinity of the trail (on either the west or east side of the river).

During construction, the trail under each of the alternatives would be detoured for public safety reasons and to allow for the continuity of the trail. During construction, park users would experience impacts from adjacent construction, including noise, dust. The trail would be fully restored following construction with no permanent adverse physical impacts on the trail. The occupancy would be shorter than the period of construction.

Bear Creek Trail

Preferred Marymoor Alternative (E2)

In order for the light rail guideway to cross over Bear Creek Trail, the trail would be lowered by 20 feet in a retained cut in its existing location. This would place the trail in a short tunnel for approximately 30 feet, but this impact would not impair the continued use of the trail. Lowering the trail would maintain the gradient, width, and height clearance to accommodate all trail users. A column could be placed near the trail, but it would not impair trail use. Construction would require temporary trail detours to maintain trail usage and to allow for trail continuity. During construction, park users would experience impacts from adjacent construction, including noise, dust. The trail would be fully restored following construction with no permanent adverse physical impacts on the trail. The occupancy would be shorter than the construction period and not change property ownership. E2 - Redmond Transit Center Design Option would have the same impacts as *Preferred Alternative E2*.

Other Segment E Alternatives

Alternatives E1 and E4 would cross the Bear Creek Trail and would result in approximately 20 feet of shading on the trail; however, it is not anticipated that this impact would impair the continued use of the

trail. Because the light rail structure would be elevated approximately 20 to 35 feet above the trail in this area, depending on which alternative is constructed, the structure would become a dominant and noticeable feature that could affect the visual environment for some trail users.

During construction, the trail under each of the alternatives would be detoured for public safety reasons and to allow for the continuity of the trail. The trail would be fully restored following construction. Impacts would be the same as *Preferred Alternative E2*, but for different length of the trail. During construction, park users would experience impacts from adjacent construction, including noise, dust. Construction would require temporary trail detours to maintain trail usage and allow for the continuity of the trail. The occupancy would be shorter than the period of construction, not involve a change in ownership of the property. The work would be minor with full replacement of the trail and the environment following construction with no permanent adverse physical impacts on the trail. The trail would be fully restored following construction.

East Lake Sammamish Trail

Preferred Marymoor Alternative (E2)

Preferred Alternative E2 would potentially realign and relocate a portion of the East Lake Sammamish Trail within its existing corridor. Design of *Preferred Alternative E2* along the former BNSF Railway corridor assumes a future trail to be developed by others. The former BNSF Railway corridor is adequately wide enough to accommodate both facilities. Also, one or more columns could be placed near the trail. Project operation would not impact access to the trail and its connection to the Bear Creek Trail.

The corridor has an urban and transportation character; it is in a former railroad corridor and contains an existing SR 520 overpass. Therefore, the visual change of the East Link Project would not substantially impair views from the trail. During construction, park users would experience impacts from adjacent construction, including noise, dust. Construction would require temporary trail detours to maintain trail usage and allow for the continuity of the trail. The occupancy would be shorter than the period of construction, not involve a change in ownership of the property. The work would be minor with full replacement of the trail and the environment following construction with no permanent adverse physical impacts on the trail. The trail would be fully restored following construction. E2 - Redmond Transit Center Design Option would have the same impacts as *Preferred Alternative E2*.

Other Segment E Alternatives

Under Alternatives E1 and E4, the East Lake Sammamish Trail would likely be relocated and reconstructed in the area along the former BNSF Railway corridor for approximately 2,200 feet where the SE Redmond Station would be located. Design of Segment E alternatives along the former BNSF Railway corridor assumes a future trail to be developed by others. Impacts would be the same as *Preferred Alternative E2*, but for different length of the trail. During construction, park users would experience impacts from adjacent construction, including noise, dust. Construction would require temporary trail detours to maintain trail usage and allow for the continuity of the trail. The occupancy would be shorter than the period of construction, not involve a change in ownership of the property. The work would be minor with full replacement of the trail and the environment following construction with no permanent adverse physical impacts on the trail. The trail would be fully restored following construction.

Redmond Central Connector Trail

The City of Redmond has plans to develop the recently acquired Redmond section of the former BNSF Railway for a trail and linear park as well as accommodating local and regional utility needs. Together, these uses have the potential to reduce the amount of space available for light rail. Since a stormwater utility project and the first phase of the trail are scheduled to be constructed in 2011 and 2012, the City of Redmond would work with Sound Transit to accommodate the light rail project which may require a shift in its current conceptual alignment or possible rerouting of the trail, replacement of a affected trail amenities, and restoration of vegetation. This would affect all of the Segment E alternatives in the former BNSF railway.

The Edge Skate Park

Only E2 - Redmond Transit Center Design Option would impact a portion of the Edge Skate Park, located along 161st Avenue NE at NE 83rd Street. The design option would require a small portion, less than 0.1 acre of the western portion of the park, which contains the sidewalk and narrow lawn area, but would not affect any recreational facilities of the skate park.

Construction would require a temporary easement of 0.2 acres and construction activities could have proximity effects to Edge Skate Park users, because construction would occur directly adjacent to this facility. Construction along the side of the park would be shorter than the duration of construction and the minor area would be restored upon completing

construction. However, construction noise and dust are not anticipated to impact the recreational functions of the skate park since these functions do not rely on quiet atmosphere. The occupancy would be shorter than the period of construction, not involve a change in ownership of the property. The work would be minor with full replacement of the landscaping area and the environment following construction with no permanent adverse physical impacts on the park.

Justice William White House

Preferred Marymoor Alternative (E2)

Preferred Alternative E2 and the E2 - Redmond Transit Center Design Option would not have an impact on the Justice White House and would not incorporate property from the resource. Therefore, there would be no Section 4(f) use.

Other Segment E Alternatives

Alternative E1 would not have an impact on the Justice William White House and would not incorporate property from the resource. Therefore, these alternatives would have no use of this Section 4(f) resource.

Alternative E4 would require the relocation of the Justice William White House, which would cause an impact on the historic context and potentially damage the building. Sound Transit has consulted with the City of Redmond and DAHP about moving the building to a nearby location, which would preserve its setting, feeling, and association with the former BNSF Railway to the extent possible. Sound Transit would consult further with the City and DAHP to find appropriate sites for the house and repair any damage to the building or demolish the building if no sites are found.

D.5 Measures to Mitigate Harm on Section 4(f) Resources

D.5.1 Measures to Mitigate Harm on Park and Recreational Resources and *de minimis* Findings

The East Link Project has undergone a 5-year environmental review process, including extensive outreach efforts and numerous studies with the agencies with jurisdiction for Section 4(f) resources. Refer to Section D.9, Table D-11, for a summary of outreach efforts on Section 4(f) resources to date.

The Final EIS reflects 24 possible alternatives divided over 5 segments, each segment representing unique geographical areas beginning in Seattle and continuing east to connect with Mercer Island, Bellevue, Redmond, and lands in unincorporated King

County. Each alternative has been developed through extensive public and stakeholder input to avoid and minimize effects on resources. Methods of avoidance included adjustments to the horizontal alignment, vertical profile, and placement of facilities, such as traction power substations (TPSS) and maintenance facilities. Proposed mitigation measures were provided for public review and comment during the Draft EIS and the Supplemental Draft (SDEIS). Following the public review process, Sound Transit and FTA worked with each agency with jurisdiction to determine mitigation measures for impacts that could not be avoided and these are described in Table D-1 (found in Section D.4 of this document).

Sound Transit has incorporated measures of avoidance, minimization, and mitigation or enhancement as conditions of the project such that the uses of each park resource would not impact the activities, features, or attributes of the facilities. Based on these measures, FTA and Sound Transit have determined that there are Section 4(f) resources affected by East Link alternatives that qualify for a determination of *de minimis* and, therefore, would not require further Section 4(f) avoidance analysis (see Table D-1 for a summary of project “uses”). The officials with jurisdiction over the resource in the cities of Seattle, Mercer Island, and Redmond and King County, have concurred with FTA regarding impacts and mitigation for Section 4(f) park resources and *de minimis* determinations in their respective jurisdictions (see letters in Attachment D1).

Concurrence with park impacts and mitigation measures for a determination of *de minimis* finding was not reached with the City of Bellevue. As listed in Table D-11, Consultation Summary, Sound Transit has coordinated extensively with the City on the project design, impacts and mitigation regarding Section 4(f) resources throughout the EIS process. The City submitted a letter in October 2008 indicating preliminary concurrence on *de minimis* findings for the Draft EIS alternatives affecting Mercer Slough Park, Surrey Downs Park and the NE 2nd Pocket Parks. A similar letter was not submitted for those additional alternatives evaluated in the SDEIS, including the preferred alternatives in Segments B and C. Most recently, Sound Transit engaged with City of Bellevue parks, transportation and legal staff in several meetings during January 2011 in an effort to come to agreement on mitigation measures allowing a *de minimis* determination for Mercer Slough Park, Surrey Downs Park and the NE 2nd Pocket Parks for all project alternatives affecting these resources. Although there was agreement on some mitigation measures, concurrence was not reached on the mitigation

measures necessary to relieve the resources from an impact on their activities, features, and attributes. City staff also indicated that it could not submit a letter concurring with a *de minimis* determination and that City Council approval would be necessary on whether or not to issue a *de minimis* determination for each project alternative. The City Council has not provided Sound Transit or FTA with a determination that impacts on 4(f) resources from any alternative would be *de minimis*. Based on this consultation, FTA and Sound Transit were unable to make a *de minimis* finding for the Section 4(f) resources within the City of Bellevue. Table D-1 describes potential mitigation measures to alleviate park effects in the City of Bellevue. FTA does not have sufficient information to justify making *de minimis* findings for alternatives in Segments B and C. Accordingly, it has not made *de minimis* findings in Segments B and C and will engage in a thorough least harm analysis.

D.5.2 Measures to Mitigate Harm for Historic Resources

For the historic resources, FTA and Sound Transit have engaged similar processes as with the park and recreational resources. FTA and Sound Transit followed the Section 106 process by engaging the SHPO and local jurisdictions, including the City of Bellevue regarding the Winters House and the City of Redmond regarding the Justice White House.

FTA has determined in consultation with SHPO that the East Link Light Rail project would have an adverse effect. The *Preferred Alternative* would result in potential impacts on the Winters House, the potential Surrey Downs historic district, and, if Alternative E 4 were selected, the Justice White House. Through consultation with local jurisdictions and interested parties, minimization and mitigation measures have been developed and incorporated into the project, which resolve the impacts. For the Winters House, the cumulative mitigation measures would result in an improvement to the resource. These mitigation measures are described in Table D-1 in section D.4 of this Section 4(f) analysis.

D.6 Section 4(f) Resource Avoidance Alternatives

The No Build Alternative would avoid uses of all Section 4(f) resources, but it is deemed not prudent per (3)(i) and (3)(ii) under the definition of “feasible and prudent alternative” in 23 CFR 774.17. The No Build Alternative is not prudent per (3)(i) in the 23 CFR 774.17 section because it neither addresses nor corrects

the transportation purpose and need that prompted the proposed project.

Under the requirements of 23 USC Section 138, NEPA documents in which the project alternatives involve impacts on Section 4(f) resources must include an analysis of alternative locations for the proposed project that avoid Section 4(f) impacts through rerouting, design changes, or other methods. Such avoidance alternatives must be selected if they are determined to be “prudent and feasible” means of meeting the project objectives. The East Link Project is the combination of one alternative from each of the five segments: Segments A, B, C, D, and E. While the alternatives vary in their routes and associated impacts, they all generally reach the same destinations within a given segment. The alternatives within each segment can generally connect with each alternative from the adjacent segments, with the exception of the alternative connections between Segments B and C. The alternatives in these two segments do not all connect at a common location and some alternatives in Segment B connect with only one or a limited number of alternatives in Segment C.

Following the concurrence with *de minimis* findings on Section 4(f) resources from Cities of Seattle, Mercer Island, and Redmond and King County, no Section 4(f) resources require further Section 4(f) avoidance analysis in Segments A, D or E; however, there is a historic 4(f) resource in Segment E. Therefore, the Section 4(f) resources requiring analysis of avoidance alternatives under Section 4(f) are in Segments B, C, and E.

D.6.1 Segment B/C Avoidance Alternatives Analysis

While the East Link Project is divided into five Segments, Segments B and C present a unique analytical problem for purposes of determining whether there is an alternative that would avoid impacts on Section 4(f) resources. Segments B and C are interdependent, meaning that selecting a route or alignment through one of these two segments would determine the range of alternatives within the other segment. In order to ensure that this analysis considers all reasonable, feasible, and prudent alternatives, therefore, Segments B and C are treated together as a single segment for purposes of the analysis of avoidance alternatives (as well as for the following section of this report, which discusses which alternative causes the least overall harm). All of the combined Segment B-C alternatives have the same southern starting point at the end of Segment A and

have common connection points with the Segment D alternatives.

Within Segment B, the potentially affected Section 4(f) resources are Mercer Slough Nature Park and the Winters House. The Section 4(f) resources in Segment C are Surrey Downs Park, NE 2nd Pocket Parks, and McCormick Park.

All combined Segment B-C alternatives analyzed in the EIS would use the Mercer Slough Nature Park. This park is the only resource that would be used by all alternatives; all other Section 4(f) resources in combined Segment B-C can be avoided by one or more alternatives. In order to constitute an avoidance alternative, therefore, an alternative must, at the least, avoid Mercer Slough Nature Park. If there are alternatives that would avoid impacts to Mercer Slough Nature Park, it is not necessary to conduct further analysis of impacts to other Section 4(f) resources since the Section 4(f) regulations require that an alternative that has *no* impacts to Section 4(f) resources be considered to be a feasible and prudent avoidance alternative. The remainder of this section consequently focuses on whether there are feasible and prudent alternatives that avoid impacts to Mercer Slough Nature Park.

D.6.1.1 BNSF Options

Avoidance alternatives were considered that connect to the BNSF Alternative (B7) on the east side of Mercer Slough Nature Park. Because of the size, north-south length and location of Mercer Slough Nature Park, it is not feasible and prudent to design an avoidance route that passes to the east of Mercer Slough Nature Park. The complexity of designing a route to the east of this resource faces the practical reality that the I-90 right-of-way through the park is too narrow in most places to accommodate an alignment on the north or south side of, and within, the existing right-of-way. Any alignment on the north side or on the south side of I-90 would require use of at least some property within Mercer Slough Nature Park. Aligning the route along the south side of I-90 to avoid Mercer Slough Nature Park would also require crossing I-90 twice, substantially increasing project costs and construction impacts to the highway. Moving the route within the I-90 travel lanes is also not feasible because the center reversible HOV lanes that have been designated for light rail use end west of the Bellevue Way interchange and general purpose freeway lanes would need to be displaced to reach the far side of the park. No other alterations to Alternative B7 would totally avoid impacts to Mercer Slough Nature Park. Therefore, any feasible and prudent avoidance alternatives would necessarily have to follow a route

to the west of Mercer Slough Nature Park, either along or to the west of Bellevue Way. There are many possible permutations of a route through Segment B to the west of Bellevue Way.

D.6.1.2 Enatai Option

One set of possible avoidance options would travel west of Mercer Slough Nature Park through the Enatai neighborhood. Any alignment through this neighborhood would result in severe disruption to this suburban single-family neighborhood. There is not an existing transportation corridor through this neighborhood that could accommodate the light rail. Routing the light rail through this area would therefore cause significant community impacts as a result of a large number of residential relocations (estimated 70 to 100 single-family homes) and the bifurcation of the neighborhood. Even with mitigation, any avoidance alternative that would bisect this residential area would cause severe disruption to an established community.

D.6.1.3 Bellevue Way Options

All other avoidance alternatives would follow Bellevue Way SE. Each of these alternatives would be elevated in the I-90 center roadway and cross over westbound I-90 in order to preserve the I-90 and Bellevue Way HOV ramps as required by WSDOT. The route would remain elevated along the east side of Bellevue Way to the South Bellevue Station. The station would be located over the west edge of the park and ride adjacent to Bellevue Way SE to provide convenient access to the high volume of pedestrians from the park and ride or bus transfers. North of the station any avoidance alternative would either continue to be elevated on the west side of Bellevue Way (similar to Alternative B2E) or descend to an at-grade profile in the median of Bellevue Way (similar to the Alternative B2A or B3). The avoidance alternative would then turn east on 112th Avenue SE and continue north and avoid Mercer Slough Nature Park.

Similar to the other Segment B alternatives (except Alternative B7), the South Bellevue Station and Park-and-Ride in the avoidance alternatives would include a four-story parking structure with about two stories above the grade of Bellevue Way. However, for the avoidance alternatives the elevated light rail guideway would be located over Bellevue Way north and south of the station and high enough to provide clearance for traffic entering the park and ride or traveling on Bellevue Way. In addition, the station would likely

require a mezzanine that would add height such that the station and guideway would be about 15 feet higher than for the other Segment B alternatives and about 20 feet higher than the top level of the parking structure.

There are two different design options for the avoidance alternatives north and south of the South Bellevue Station. The Road Widening Option would place the elevated guideway on piers in the northbound lane of Bellevue Way. This would require repositioning and reconstructing the entire roadway to the west, resulting in removing the majority of dense, mature vegetation and an additional 13 residential property acquisition more than others Segment B alternatives (16 in total) and the need for retaining walls taller than currently proposed for other Segment B alternatives. To avoid shifting Bellevue Way to the west and the associated impacts, the Straddle Bent Option would support the

elevated guideway on approximately 23 straddle bents which would span entirely over the existing Bellevue Way right of way. The straddle bents would be positioned approximately every 100 to 120 feet for about 0.5 mile north of the

Straddle bents consist of double column piers with a beam on top to straddle over the roadway (or other obstacle) to support the elevated light rail guideway in the air.

I-90/Bellevue Way interchange; extending north of the South Bellevue Station. The straddle bents in combination with the elevated light rail guideway would create a "rib cage" like effect or viaduct over this section of the road. See Exhibit D-24 for a representative image of a straddle bent. Due to the position over Bellevue Way, this avoidance option would be at least 15 feet higher than the other Segment B alternatives.

The avoidance alternatives that require an elevated route along (or to the west of) Bellevue Way would cause unique problems. These problems, outlined below, while perhaps individually minor, cumulatively cause unique problems and impacts of extraordinary magnitude.

- The Straddle Bent Option would restrict the ability to widen the south end of Bellevue Way in the future as it would place a column on either side of the road.
- The Road Widening Option would displace 13 additional residences (than other Segment B alternatives) on the west side of the road.



EXHIBIT D-24
Representative Straddle Bents Supporting a
Light Rail Guideway

- Visual impacts from I-90 to the South Bellevue Station would be greater than any other Segment B alternatives under either option. The greater height of the station and guideway would make it a more visibly imposing structure and potentially block views of Mercer Slough Nature Park from residents along Bellevue Way, adding visual quality impacts. This alternative would be higher than all previous alternatives by 10 to 15 feet, which would make it more visible from park users. The other Segment B alternatives take advantage of the topography of the South Bellevue Park-and-Ride to lower the height of the station for on looking residents. For the Straddle Bent Option there would be substantially larger visual impacts from the numerous straddle bents across Bellevue Way, from I-90 to north of the station. The long row of straddle bents would create a viaduct over the road and more enclosed experience for travelers on Bellevue Way and be a visual obstruction for residents. Also, the added height would make the light rail infrastructure more visually prominent for park users. In combination, these changes would severely change the visual quality of Bellevue Way. Widening the road to the west for the Road Widening Option would remove most of the mature existing green belt vegetation and require taller retaining walls along west side of Bellevue Way than other Segment B alternatives. Mature vegetation would take several years to replace. The two avoidance options move the light rail closer to the residences west of Bellevue Way SE and would increase potential noise impacts, although mitigation with noise walls would likely address these impacts. However, the walls would increase the visual impact of these options.
- Construction would impede traffic circulation along Bellevue Way SE for longer periods of time than other Segment B alternatives. Shifting the roadway and/or constructing straddle bents over Bellevue Way and near the I-90 interchange would result in longer term traffic restrictions on the primary arterial to I-90 serving the communities of Enatai, Beaux Arts, and Bellevue.
- The costs for the southern portion of the avoidance alternatives would be higher than any other Segment B alternative. The higher costs would be attributed to acquiring and relocating at least 12 more residences than other Segment B alternatives, the straddle bent construction or the additional road widening further west resulting in higher retaining walls, and the higher elevated station. Together these project elements would increase the overall project costs for this portion of the alternative compared with the other Segment B alternatives.
- Finally, stakeholder input and coordination with City of Bellevue has emphasized the need for the alignment to be as far away as practical from residences along Bellevue Way. Per City of Bellevue letter dated February 25, 2008, the City expressed a desire to balance three key principles in South Bellevue: *“provides transit access by facilitating regional and local connections at the South Bellevue Park-and-Ride, protects neighborhoods by placing the line farther away from residences, and minimizes construction impacts by reducing the amount of street reconstruction required along these major transportation corridors.”* Contrary to the City’s desires, the avoidance alternative would result in longer construction impacts along Bellevue Way SE and place the guideway closer to residences along Bellevue Way SE
- Any avoidance alternative along or west of Bellevue Way would result in higher cost, materially greater construction impacts, residential impacts, noise, and visual effects compared to alternatives that would have relatively minor impacts on Mercer Slough Nature Park. The substantial additional impacts and cost associated with avoidance alternatives along, or to the west of, Bellevue Way must be considered in the context of the small impact to Mercer Slough Nature Park that would result from the Segment B alternatives. The Segment B alternatives with the least effect on Mercer Slough Nature Park would

occupy less than an acre of this 320 acre park, which is less than 0.3 percent of the park area. In addition, the affected area is not significant in terms of its character and function relative to the overall natural focus of the park and the guiding objectives and purposes as set forth by the resource managers. The affected areas are near I-90, an 8-lane freeway, adjacent to Bellevue Way SE, a very busy and noisy four lane arterial, and adjacent to the existing South Bellevue Park and Ride that currently contains about 440 parking stalls and substantial bus service. For most Segment B Alternatives along Bellevue Way in the EIS, the affected park area consists largely of open grass, paved sidewalks and paths with some natural vegetation.

Considering how the term “prudent” is defined in applicable FTA regulations, this analysis reveals that there are no feasible and prudent avoidance alternatives to the minor impacts that the project would cause to Mercer Slough Nature Park. Because there is no prudent and feasible alternative to avoid the Mercer Slough Nature Park, then pursuant to 23 CFR 774.3[c]), a Least Harm analysis is required, found in Section D.7.

D.6.2 Segment E Avoidance Alternatives Analysis

Section 4(f) resources in Segment E are not influenced by the connection from Segment D. The prudent and feasible analysis will be confined to alternatives and avoidance alternatives within Segment E. Alternative E4 would be located on the Justice William White House property and would relocate the house. This would cause an impact to the historic context, potentially damage the building, and have a Section 4(f) use. Avoidance alternatives considered in this evaluation consist of relocating Alternative E4 light rail route northeast of the Justice William White House in a new route or selecting another project alternative currently under consideration.

D.6.2.1 Avoidance through New Routes

An avoidance alternative would be feasible by shifting Alternative E4 alignment to the north side of Leary Way before turning south into the former BNSF Railway. Using the same alignment from SR 520, the guideway would be elevated diagonally over the West Lake Sammamish Parkway and Leary Way intersection and crossing Sammamish River in bridge structure before lowering to an at-grade profile adjacent and parallel to Leary Way. To enter into the former BNSF Railway corridor, the guideway would diagonally cross at the Leary Way and NE 76th Street NE intersection, which would stop traffic in all directions. This crossing would require gates and bells. The noise would not affect the

Justice White House, as the building is zoned and used as an office building, which is not noise sensitive according to FTA noise criteria.

Shifting the Alternative E4 alignment to the north would avoid the Justice William White House but would permanently affect another 4(f) resource, the Dudley Carter Park. This new alignment would result in the permanent acquisition of approximately 0.12 acre of this park. Also, an open space, which is publicly held by City of Redmond but not officially park lands, would be impacted for approximately 0.5 acres. This land was protected as a heron rookery but the city has recognized that the rookery is not longer occupied. There are no available replacement lands for the park and open space property acquisition in the nearby vicinity. A shift in Alternative E4 would also acquire a condominium building with approximately 15 housing units located just west of the Sammamish River, north of NE Leary Way. Finally, the revised alignment would pass through an undeveloped property on the northeast corner of Bear Creek Parkway and Leary Way, dividing the property and creating an undevelopable remnant. For these reasons listed, this alternative would not be prudent compared to the relocation of the Justice White House.

D.6.2.2 Avoidance by Selecting Another Project Alternative

Preferred Alternative E2, E2 – Redmond Transit Center Design Option, and Alternative E1 would avoid impacts on the Justice White House. They do, however, impact other Section 4(f) resources, but as described in Section D.5, FTA has determined, and the City has concurred, that following mitigation, they qualify for a finding of *de minimis*, meaning there is no remaining harm after mitigation and would not require further Section 4(f) avoidance analysis.

Preferred Alternative E2 is a prudent and feasible alternative because among the avoidance alternatives, it has similar if not lower environmental impacts, least cost, maintains high ridership, and is generally supported by the City of Redmond. The E2 - Redmond Transit Center Design Option would not be prudent because it has the highest business displacements and the highest cost of any avoidance alternative.

While Alternative E1 avoids impacts on the Justice White House, it would not be prudent because it has similar impacts as Alternative E4. With the addition of the highest impact on high-value habitat, it would result in lowering visual quality along West Sammamish Parkway NE and it would be a higher cost alternative.