Thank you for your comment stating a preference and reason for preferring the station at NE 145th Street in Shoreline.

Sound Transit is aware of the Fire Department's concerns about the possible impacts of a light rail station at NE 155th Street on operations of the fire station at that location. If this station were to be advanced as part of the project, Sound Transit would further define measures to manage traffic serving the station while maintaining effective access for the fire station. Sound Transit would work closely with the city and the Fire Department to resolve potential conflicts with bus and vehicle traffic and to maintain emergency response times and access during the construction period and operation of light rail. However, the Preferred Alternative does not include this station site.

Thank you for noting the City of Shoreline's station area planning efforts around the NE 185th Street Station and at the NE 145th Street Station; the Draft EIS and the Final EIS both note the City's preference for these stations and include information about station access.

Thank you for the comment stating a preference for the NE 145th Street Station in Shoreline. This letter was noted in the materials provided to the Sound Transit Board, prior to their selection of the Preferred Alternative for Segment A, which includes a NE 145th Street Station.
Thank you for noting the importance of the District's main water line serving Mountlake Terrace and its proximity to the project. In producing the Final EIS and for the Preliminary Engineering for the Preferred Alternative, Sound Transit continued to identify utilities with potential conflicts; any plans for constructing the project would include a commitment to maintain service on significant connections such as the water line, and Sound Transit will continue to coordinate with the District during final design and construction.
Thank you for your comment stating the City's overall support for the project, its preferred alignment and station locations, as well as other aspects of the project the City is encouraging. The Final EIS includes further information about how the Preferred Alternative and other alternatives would provide transit access and parking while maintaining effective multimodal access and circulation around stations.

L-003-002
Thank you for providing additional details about the City's progress in developing the Southern Gateway subarea plan and the need for improved transit access. The added density and provision for housing along the corridor connecting to a NE 145th Street Station are consistent with the future patterns of growth that Sound Transit anticipates in ridership forecasts for the project.
Even with this housing in place, the majority of Lake Forest Park residents intending to use mass transit will continue to face the challenge of accessing transit options. Our physical geography and terrain make regular transit circulation service within the city impractical, and our citizens are forced to travel to transit system access points.

Siting stations on the east side of the I-5 alignment and providing parking in their immediate vicinity will allow them that access. Stations at 145th and 185th would provide Lake Forest Park with direct access to Link more than any of the other stations currently under study, and would provide an even 40-block separation between stations more effectively serving the population while maintaining system efficiency. As the configuration of SR-522 at Seattle's northeast boundary constricts all traffic on SR-522 southbound, the access to a 145th St station for commuters is essential and needed.

SR-522 helps to provide linkage to the UW Seattle and UW Bothell. A Link station at 145th (SR-523) would help to provide the first step towards regional transit access from the east side of Lake Washington to the Shoreline Community College. This route would be an excellent application for future bus rapid transit (BRT).

We appreciate your consideration of the needs of our citizens.

Sincerely,

Mary Jane Goss
Mayor
Sound Transit appreciates the City's collaboration through the Draft EIS preparation for the Lynnwood Link Extension and in the planning efforts for ST3.

The traffic analysis around the Lynnwood Transit Center Station has been updated for the Final EIS, including using Vissim software and expanding the coverage area to include the intersections related to the 196th Street/Poplar Way interchange. The scope of this revised analysis was coordinated with the City of Lynnwood, and is discussed in more detail in the Final EIS Transportation Technical Report.

Section 2.8.1 of the EIS describes the separate utility of the proposed Operations and Maintenance Satellite Facility (OMSF) under NEPA and SEPA. Sound Transit is currently developing a separate EIS for the OMSF, which evaluates operations and maintenance needs across the Sound Transit district and is not focused on a specific corridor. The Draft EIS for the OMSF was issued in May 2014.
The Final EIS has updated estimates for ridership and preliminary concepts call for even more connecting transit service when the light rail opens. However, the forecasts take into account the patterns of ridership that exist today, which has a fairly high number of riders reaching the Lynnwood Transit Center using transit. In addition, the estimated level of riders arriving by bus at the Lynnwood Transit Center Station reflects ridership for the entire day. Park-and-ride access would be higher during the peak period, while bus access would be higher during midday when parking is full, as is seen in many other areas in the Sound Transit system. The Final EIS also defines measures that would minimize the potential for spill-over parking into surrounding areas.

Sound Transit, in coordination with the City of Lynnwood, developed a modified Alternative C3, which was evaluated in the Final EIS and defined measures that would avoid impacting the City’s ability to upgrade Lift Station 10. The property acquisition information for Alternative C3 has been updated in the Final EIS, including the error on page 4-29 of the Draft EIS that indicated that the La Quinta Inn would be displaced.

The Draft EIS did not include a detailed assessment of impacts to individual properties because any extension would need to be part of a future ST3 program that has not yet been fully defined or approved. While it would be speculative to identify specific properties, particularly given the lack of information on timing, the Final EIS does discuss under cumulative impacts the likely level of impacts that could occur.

Thank you for your comment.
L-004-008
The City's concerns for Alternative C1 are noted and are addressed in more detail in response to your comments below.

L-004-009
Thank you for your comment. Responses to these comments are provided where they are discussed in greater detail in your comment letter.

L-004-010
Thank you for identifying the City's concerns with Alternative C3; modifications of Alternative C3 developed with Lynnwood staff have reduced impacts on the block east of 44th Avenue W and improved the light rail station/transit center connection. This modified Alternative C3 is evaluated in the Final EIS.

L-004-011
The Final EIS incorporates and examines in detail Alternative C3 Modified, which was developed in coordination with the City.

L-004-012
The Draft EIS did not include a detailed assessment of impacts to individual properties because any extension would need to be part of a future ST3 program that has not yet been fully defined or approved. It would be speculative to identify specific future properties for acquisition and displacement, particularly given the lack of information on timing and the potential that future projects could involve alternatives that avoid the next property or properties. However, the Final EIS does discuss under cumulative impacts the likely level of impacts that could occur for each alternative. This includes the modified Alternative C3, which avoids some of the properties of concern to the City.

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1. General Comment: Sound Transit has provided analysis of three track alignments and station locations referred to as C1 (north along 200th), C2 (middle route above existing bus platforms) and C3 (southern). Each option presents significant issues.
   - C1: Noise and visual impacts to homes along 52nd, impacts to Scriber Creek Park, removal of many homes and business along 200th
   - C2: Noise and visual impacts to homes along 52nd similar to C1, impacts to Scriber Creek wetland
   - C3: Poor location for supporting City Center development, potential impacts to a major City sewage lift station (10) and potential flooding issues and major property takes/loss of development potential on the block east of 44th (La Quinta Inn, Veterinary Building and others), poor access to bus transfers unless a completely new bus facility closer to the station is built at public expense.

2. General Comment: Sound Transit staff has referred to the three alternatives as “bookends” indicating that variations of the alignments may in fact be possible. Staff believes that an option we are calling “C3 Modified” is worthy of study. As envisioned it would leave the I-5 ROW at the same point as C3, eliminating direct impacts to homes along 52nd, avoiding Scriber Creek Park and the need to acquire homes and businesses along 200th. It would run over the rear of the School District property, behind their proposed building over an open area designated for outdoor bus parking. It would enter the Transit Center on an angle, running northeast. The station would be located near the existing bus platforms supporting intermodal access and eliminating the cost of relocation. The tail track would be aimed in the general direction of the intersection of 200th and 44th in such a way that under ST3 the line could be extended over or adjacent to Alderwood Mall Boulevard thereby avoiding most of the properties on the block east of 44th. This alignment would offer a station location that creates good development potential (due to better access) in City Center. This option would also avoid impacting City Lift Station 10 which is planned for a major expansion, associated odor issues and potential flooding problems experienced in that area.
   C3 Modified is presented in a map attached to this document.

3. General Comment: The Lynnwood Link DEIS contains a critical flaw. In spite of earlier requests by the City, the DEIS disregards the impact result directly from ST2 decisions when ST3 is advanced. The three track alignments and station locations in Lynnwood will of necessity result in three different alignments of track extensions under ST3 when this project advances. The three alignment options therefore have an immediate, direct and immutable impact upon the entire block bounded by 44th Ave. W, 40th Ave. W, Alderwood
An analysis was conducted regarding the capacity of local bus service to accommodate the increased demand, and it was determined that buses would not be overloaded. Also, while Sound Transit does not have authority over funding for improvements to local bus transit service, Sound Transit will coordinate with Community Transit in the development of appropriate modifications to local bus service to best accommodate demand at the station. Regarding traffic arriving from points north of Lynnwood, an updated analysis has been performed using microsimulation to better capture congested conditions, which is reflected in the Final EIS.
5. General Comment: All references to Lynnwood creating a Town Center need to be changed to City Center.

6. S.2 Purpose and Need for the Lynnwood Link Extension, P. S-2: Purpose and need for the Lynnwood Link Extension: The project is needed to create the transit infrastructure needed to support the development of Northgate and Lynnwood (language proposed by the City)-the corridor’s two designated Regional Growth Centers.

7. S.9, P. S-31 and S.3.4, P. S-15 Areas of Controversy and Issues to be Resolved: The DEIS claims that both Lynnwood and the Edmonds School District expressed concerns regarding the potential location of the Operations and Maintenance Satellite Facility (OMSF), in Lynnwood. This statement incorrectly characterizes the positions of the City and School District. Both Lynnwood and the District opposed the designation of an OMSF site in Lynnwood in writing (in Lynnwood’s case a Resolution adopted by the City Council) and in oral comments offered at the ST Board Public Hearing. The many obvious flaws of this site were pointed out including its location directly across the street from hundreds of affordable homes, impact to critical wetlands and the fact that the School District has approval to build their Administration complex on the site. Both the City and District asked the ST Board to eliminate the Lynnwood OMSF site from consideration. The Board went ahead and approved consideration of the site along with others in Bellevue. It is also significant to note that the two Board representatives from Snohomish County stated on the record that by voting to approve consideration of the Lynnwood site, they understood its many flaws. Further, it was their desire to see an OMSF located not in Lynnwood, but rather near Payne Field when ST3 is built.

8. Table 2-1c Alternatives Considered, Summary of Design Features for Segment C
Alternatives, P. 2-13: Description of the alternatives ends at the Lynnwood Transit Center.
The table fails to mention that the C3 tail track will extend across 44th Ave and require removal of buildings east of 44th or the resulting impacts from ST3 extensions that would result from ST2 decisions.

9. 2.5.2 Alternatives Considered, Developing Details of the Alternatives, P.2.35: “The evaluation criteria included the following factors: ...” Station area development potential (existing land use and transit-oriented development potential). The DEIS focuses on existing land use for alternative C3 and fails to mention impacts of C3 on the high density development potential dividing the block north of 44th in half with its tail track. We disagree that the alternative C3 station location has the same development / TOD potential as C1 and C2 which are closer walking distances to the City Center, (within the PSRC Lynnwood Regional Growth Center slated for highest development potential in Lynnwood), P. 4-18 states that Segment C ends within the Lynnwood City Center, inside of the PSRC -

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L-004-014
The Final EIS has been revised to change “Town Center” to “City Center.”

L-004-015
The comment appears to state the purpose and need as it was published; it is unclear what other language the City is proposing. Sound Transit is retaining the purpose and need as it was published in the Draft EIS; the current purpose and need reflects public input from two scoping periods that were held prior to the Draft EIS development.

L-004-016
As described above (per Section 2.8.1 of the Draft EIS), the Link Operations and Maintenance Satellite Facility (OMSF) is a separate project that would support the Lynnwood Link Extension as well as East Link and other ongoing system growth. The separate OMSF Draft EIS published in May 2014 evaluated the impacts from alternative locations for that facility. The Final EIS for the Lynnwood Link Extension has been revised to note the opposition of the City and the School District to the site.

L-004-017
The intent of Table 2-1C was to convey design features and potential impacts for the Draft EIS alternatives, and did not attempt to speculate about possible impacts or conflicts with potential future planning efforts related to the Long-Range Plan or future development projects that have not yet been defined. Potential property impacts associated with the proposed Alternative C3 are discussed in the Draft EIS in Chapter 4 (Section 4.1 Acquisitions, Displacement, and Relocation). Table I-4.1.3 in Appendix I-4.1 Acquisitions, Displacements, and Relocations identifies five parcels that could potentially be affected by the tail track under Alternative C3.
Sound Transit assessed TOD potential within station areas based on four key factors: existing conditions, transit-supportive plans and policies, station access, and potential development opportunities. Among the three Lynnwood alternatives, some minor differences were noted in the assessment. However, these differences were not significant enough to warrant a change in the overall rating and therefore ratings were similar for all alternatives.

Through coordination with the City of Lynnwood, Sound Transit developed a modification to the alignment proposed under Alternative C3. The revised alignment is a component of the Preferred Alternative, which relocates the tail tracks to run directly south of Alderwood Mall Boulevard, preserving the majority of the block east of 44th Avenue W. In Section 4.2.4 of the Final EIS, a comparison of the TOD potential will be revised to include the modified alignment. In addition to analysis of the new alignment under the Preferred Alternative, the Final EIS revisits the TOD assessment performed for the Draft EIS.

L-004-018

The decision to treat the OMSF as a project with independent utility was made by FTA in conjunction with Sound Transit, but the two projects have continued to disclose their combined impacts in cumulative effects discussions. Sound Transit recognizes the City’s concerns with the Lynnwood OMSF site, but comments about that project are being addressed through that project’s separate process. As such, this project has no influence over the OMSF EIS schedule; the OMSF Draft EIS was published in May 2014.

Sound Transit assessed TOD potential within station areas based on four key factors: existing conditions, transit-supportive plans and policies, station access, and potential development opportunities. Among the three Lynnwood alternatives, some minor differences were noted in the assessment. However, these differences were not significant enough to warrant a change in the overall rating and therefore ratings were similar for all alternatives.

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L-004-018

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Sound Transit generally does not support the use of on-street parking or parking in privately owned lots for transit users, although some private lot use is used by other transit agencies in the region. The parking analysis was performed to determine the current parking utilization in the area, and to see if there would be potential for hide-and-ride parking impacts. As described in the Draft EIS, if there are impacts, mitigation measures, such as adding parking zones and monitoring private lots, could be used to minimize the potential for hide-and-ride parking. Section 3.6 of the Final EIS specifically identifies the mitigation measures Sound Transit proposes to apply.

The analysis has been expanded to include the I-5/196th Street/Poplar Way interchange to better determine impacts.

Additional analysis has been performed to evaluate additional parking at the Lynnwood Transit Center Station. Long-term parking impacts are examined in Section 3.2.7 in the Draft EIS.

Issues related specifically to the OMSF are being addressed through that project's independent EIS review process.
The Final EIS Chapter 3 includes updated analysis of the project's impacts related to trips to the Lynnwood Transit Center Station and park-and-ride, including the intersections of 200th with 40th Avenue W, 44th Avenue W, and 48th Avenue W. The Preferred Alternative includes street widening and intersection improvements as part of its definition, which addresses impacts previously described in the Draft EIS for all alternatives.

In responses above, Sound Transit has addressed the reasons why the impacts of potential future extensions are not identified in detail in the Draft EIS; the potential effects of possible ST3 projects are discussed in the Final EIS, but it remains premature to identify possible impacts to specific properties.

For the acquisitions information, the properties identified in Section 4.1 Acquisitions, Displacements and Relocation and in the related appendix are accurate; the hotel was incorrectly identified as a displacement in Section 4.2 Land Use, and this has been corrected for the Final EIS. However, the level of impacts by alternative, as well as the proposed mitigation measures, remain otherwise accurate, and the information in the Draft EIS gave an appropriate basis for public review and discussion of the alternatives under consideration. The Draft EIS notes that the parcel-level impacts are based on conceptual designs, and any properties required for the project would be covered by Sound Transit commitments to conduct property acquisition activities in accordance with state and federal law.
Thank you for identifying these additional projects for consideration in the cumulative effects analysis. Appendix H in the Draft EIS did include the 196th widening project, but did not include the other three projects that you mentioned. The Final EIS now reflects these projects in Appendix H.

Sound Transit has worked with Lynnwood staff to define the modification to Alternative C3 to address concerns about the original alternative. Those modifications are evaluated in the Final EIS, and do not conflict with the current footprint of the lift station facility. However, in response to the City's concerns, Sound Transit will coordinate further design and construction for Alternative C3 so as not to preclude or conflict with the City's ability to expand the capacity of the lift station. At this time, the City does not have detailed designs for the expansion, and initial conversations with the staff have indicated that expansion would involve equipment upgrades more than a physical expansion of the facility's footprint. However, consistent with mitigation measures described in Section 4.15.5, this coordinated approach to final design and construction would address potential conflicts.

Floodplains within the project area, and in the vicinity of Alternative C3, were discussed in Section 4.9.2 in the Draft EIS.

The Economic Development Plan has been added to the discussion of adopted plans and policies. The other documents are not directly related to land use plans and policies adopted by the City, so they were not added to the Final EIS. The purpose of the land use review is to identify potential conflicts with existing land use plans. The suggested edits to the text in Section 4.2.1 were made in the Final EIS. The TOD potential report did not include specific property impacts. This assessment has
been updated in a separate document that continues to be referenced in the Final EIS.

L-004-029
The Draft EIS noted that the elevated light rail structure above the parking lot would change the character and user experience of this area of the park, as discussed in the Scriber Creek Park evaluation in Section 4.17.2 of the Draft EIS.

The use of Conservation Futures Funds for property acquisition creates a requirement for review and approval by the original funding jurisdiction if the property is transferred for a different use. Approval of a transfer typically requires mitigation. These requirements were taken into consideration in the selection of the Preferred Alternative and the process to identify mitigation for impacts. However, as noted in several chapters of the Final EIS, Section 4(f) impacts related to the park would not allow Alternative C1 to be approved by FTA without modifying the alternative to either avoid the park or reach agreement with the City that the impacts are minor.

L-004-030
The Draft EIS discussion did address noise effects to the park on page 4-241, although it noted that FTA's definition of a noise sensitive property would not place the park as highly noise sensitive given the lack of quiet in the park today, and that park activities did not require quiet. However, for the Final EIS, the park has been identified as noise sensitive, consistent with the OMSF project Draft EIS and further discussions with the City. Noise mitigation to be applied for nearby residences (which are noise sensitive) would also help reduce noise levels within the park. Construction activities affecting the park were noted on the same page in the Draft EIS, and the Final EIS more specifically mentions noise as one of the common types of construction period impacts.
32. Alternative C3: DEIS text should be corrected as follows: “Alternative C3 would acquire and convert the fewest properties to transportation use. The affected parcels would be single-family, commercial, industrial, public, and institutional properties and any one existing use (as outlined) would be displaced. These changes in land use are not expected to markedly alter land use patterns or development character will significantly alter the land use of this highest density zoned block in Lynnwood’s City Center and Regional Growth Center. The Lynnwood Transit Center Station Options 1 and 2 have different layouts but would affect the same areas, and the land use impacts for both options would be similar. Both C1 and C2 station options would be compatible with area development patterns and could reinforce intensification of commercial and higher-density multifamily uses near the station. The C3 station location is remotely located away from City Center and access by pedestrians. The impacts of C3 are different as C1 and C2 do not remove development potential from the City Center Core and are more walkable distances to TOD developable properties, better supporting state, regional and local growth management plans.”

33. 4.2.4 Indirect and Secondary Impacts, P. 4-31: The following impacts of Alternative C3 related to the Sound Transit adopted TOD policy from 2012 need to be addressed in the EIS:
- “Support implementation of state, regional and local growth plans, policies and strategies”: C3 removes high density development potential with the tail track and future extension under the potential ST3.
- “Encourage convenient, safe multi-modal access to the transit system, with an emphasis on non-motorized access”. C3 walking distance is furthest from developable property within City Center.
- “Support economic development efforts”. C3 provides the least support for City Center TOD redevelopment. This option removes developable land within the core of the City Center which is further compounded by future impacts of ST3. C3 damages and ultimately eliminates two hotels that are critical to Lynnwood’s tourism industry.

34. “To assess land use and economic development performance, the report considered access to regional growth centers and the station area development potential for the station areas served by each alternative. An overall rating was assigned to each station area based on its relative potential to support transit-oriented development, which was assessed by four elements:
- Existing conditions supporting transit-oriented development
- Transit-supportive plans and policies
- Station access
- Potential development opportunities”
These elements illustrate that C3 with its farthest distance from City Center high density, impacts on TOD redevelopment properties, impacts on hotel properties and walkability constraints cannot have development potential equal to the C1 or C2 options with closer their proximity to City Center and less impact from tail tracks and future impacts under ST3.

35. 4.2.4 Land Use Indirect and Secondary Impacts, P. 4-32 and Table 4.2-3 Summary of Station Area TOD Potential by Station Area, P. 4-33: Arguably, TOD potential in Lynnwood is much higher than the equally ranked Mountlake Terrace options which have only a small

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L-004-031
This text was revised for the Final EIS generally as suggested.

L-004-032
Sound Transit’s noise mitigation commitments, described in Section 4.6, address potential noise impacts.

L-004-033
Text has been added to the Final EIS to revise the parcels that would be affected and to revise the statement regarding land use patterns and development character.

L-004-034
Sound Transit’s TOD policy was considered in the development of TOD potential for the project, which was referenced in the Draft EIS. Sound Transit assessed TOD potential within station areas based on four key factors: existing conditions, transit-supportive plans and policies, station access, and potential development opportunities. Sound Transit has considered the City’s comments and a comparison of TOD potential will be revised to include the modified Alternative C3. In addition to analysis of the new alignment under the Preferred Alternative, the Final EIS revisits the TOD assessment performed for the Draft EIS.

L-004-035
As noted above, the evaluation of TOD was documented in a supporting planning document and was used in the EIS primarily as a means for weighing the potential magnitude of future changes in land use if a station were built. Among the three Lynnwood alternatives, some minor differences were noted in the assessment. However, these differences were not significant enough to warrant a change in the overall rating and therefore ratings were similar for all alternatives. Sound Transit has
considered the City’s comments as well as other design updates and the Final EIS revisits the TOD assessment performed for the Draft EIS.

L-004-036

Sound Transit has considered the comments by the City and others and has updated the text for the Final EIS to remove the incorrect reference to the hotel property. The text also now references the City’s concerns about impacts to the densely zoned block. However, Sound Transit’s conclusions in the EIS regarding the potential for overall land use impacts of the alternative remains similar to the characterization in the Draft EIS. Alternative C3 would not preclude all development on the block, and its other land use impacts are less than the impacts of either Alternative C1 or C2 because it avoids properties along 52nd Avenue and south of 200th Street SW.

TOD potential was one of the aspects of land use change considered in the Draft EIS, but existing uses, land use patterns, adopted plans and policies, and future planned uses are all considered. The City’s comment characterizing the Alternative C3 station location as remote overstates the differences in the location of the alternatives and their proximity to other uses, as well as related benefits, but the modified Alternative C3 Sound Transit has developed in coordination with the City does place the station location closer to the city center core.

L-004-037

Section 4.3.2 of the Draft EIS evaluated the direct impacts to one business that would need to be acquired and displaced under Alternative C3. In the Final EIS, the Preferred Alternative modifies Alternative C3 by minimizing the amount of acquisition required within the triangular block east of 44th Avenue West, north of Interstate 5, and south of Alderwood Mall Boulevard. This area has been identified by the City of Lynnwood as an area planned for future high-density development. Alternative C3 Modified, designed with input from the City of Lynnwood, places the tail...
track adjacent to and immediately south of Alderwood Mall Boulevard without bisecting the triangular block. The realignment of the tail track minimizes impacts to future redevelopment of parcels within this triangular block by minimizing acquisitions. The revenue potential related to future redevelopment has not been analyzed in the EIS due to the speculative nature of the size, type, and timing of future development. Any future extension of the Link light rail system north of Lynnwood could continue from the tail track section while paralleling Alderwood Mall Boulevard, also minimizing impacts to revenue potential.

L-004-038
Although the Draft EIS noted that the impacts would be higher, the Final EIS has been revised to note that the construction of the two projects could be sequential and extend the duration and severity of the impacts.

L-004-039
Section 4.3.5 of the Final EIS has been revised to state that “the Link Operations and Maintenance Satellite Facility and the larger transportation projects would have similar or greater capital construction expenditures and construction multiplier effects on the regional economy...”

Section 4.3.5 of the Draft EIS does acknowledge that the Link Operations and Maintenance Satellite Facility would also displace some of the opportunities for increased development and redevelopment potential adjacent to stations. Section 4.3.5 of the Draft EIS also acknowledges the potential loss of additional property tax revenue to the City of Lynnwood due to the construction of the Lynnwood Link Extension and the Link Operations and Maintenance Satellite Facility Project.

Increased long-term employment at the Link Operations and Maintenance Satellite Facility during operation would be quantified as
part of the separate NEPA/SEPA analysis being performed for that project.

The Interurban Trail is evaluated for historic significance in the Final EIS, but the analysis determined it lacks integrity of design, materials, workmanship and feeling. It is a paved bicycle and pedestrian trail that retains none of the elements of its original use, such as rails, ties, concrete abutments or other related facilities. Therefore, the trail does not convey the historic significance of the rail line. Accordingly, FTA determined, and the SHPO concurred, that the trail is not eligible for listing in the NRHP. Due to its importance in the community, Section 4.4

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46. 4.7.3 Noise and Vibration, Alt C3 Noise Impacts, P.4-121: No analysis of the tail track turnaround noise impact on hotels and properties. Hotels adjacent may have impacts to guests staying overnight and impacts for TOD potential mixed use. A church use is identified for C1, so including analysis of these impacts for C3 would be consistent.

47. 4.7.6 Noise and Vibration, Cumulative Impacts, P. 4-124 states that “Because Sound Transit is mitigating all noise and vibration impacts (as defined by exceeding applicable FTA, state, or local criteria) created by the project, the project would not increase cumulative noise or vibration impacts, considering other current or future actions in the project area.” Future actions as described here should include currently adopted City Center Sub-Area Plan within the PSRC designated Regional Growth Center to accommodate high density residential and commercial uses. C3 tail track impacts on this future action are not currently considered in the EIS and need to be.

48. 4.7 Noise and Vibration, Cumulative Impacts, Page 4-126: The DEIS appears to accurately portray the potential for noise impacts to homes under each of the C track alignments. It then states that “Noise impacts could be mitigated by a 4-6" tall barrier” along the tracks. The City is seeking confirmation that these noise barriers will be designed into the project.

49. 4.8.1 Affected Environment: This section does not include a discussion of fauna that use the C-Segment sites, but may not be listed under ESA. Species may be impacted that have local significance, including birds and mammals (for example - river otters frequently use Scriber Creek and regional wetland). Disruption to these species would have significant emotional impact for locals who take enjoyment in viewing opportunities. This should be acknowledged and the impact assessed.

50. 4.8.2 Long Term Impacts: Impacts to Scriber Creek are understated. Scriber is definitively channelized, contrary to statements made otherwise (particularly as it relates to C-2). This area frequently experiences flooding, backing-up, and flooding of properties immediately upstream. Any activity which may impede capacity, or affect our ability to maintain the channel must be acknowledged and avoided.

51. 4.8.2 Long Term Impacts: There is no discussion of the impact of lighting and noise on the wetland affected by the C-segments. Increased light and noise directly over the Scriber Regional Wetland will impact animal use (particularly nocturnal animals – beaver and raccoons), and nesting birds. Predation of aquatic animals will increase as aquatic visibility increases. Noise and vibration may push out resident mammals (such as the river otters, or beavers) into surrounding areas.

52. 4.8.5 Ecosystem Resources, Cumulative Impacts, Page 4-144: states potential impacts of school district’s administrative facility, and 4.15.4 on page 4-196 states the indirect and cumulative impacts of the School District facility as the same as the OMSF, please remove as Sound Transit Lynnwood Link DEIS - City of Lynnwood Comments - Sept. 3, 2013 - Page 13 of 16

Social Impacts, Community Facilities, and Neighborhoods and Section 4.17 Parks and Recreation Resources evaluate potential adverse impacts on the Interurban Trail.

At Hall Lake, no remnant of the saw mill that was originally at this site remains. There are several small houses that may be related to the Church of the Nazarene's Hall Lake camp. However, all of these buildings have been altered and they no longer retain integrity of design, materials and workmanship. For this reason, FTA determined, and the SHPO concurred, that the buildings are not eligible for listing in the NRHP. The Cultural, Archaeological, and Historic Resources Technical Report notes that this property has an historic importance to the City of Lynnwood. Due to this local importance, Section 4.4.2 of the Final EIS was revised to evaluate impacts on the lake and concludes the lake will not be affected by the proposed light rail.

As discussed in Section 4.5, Sound Transit will develop design criteria for light rail stations featuring a consistent architectural theme that could include details related a community’s settlement, historic resources, or nearby community facilities. Preliminary concepts for station designs will be developed with input from local jurisdictions and WSDOT, and will be vetted with the public. Sound Transit's station design standards will promote visual unity in the station areas.

L-004-041

The discussion of potential long-term impacts (Section 4.4.2) and construction impacts (Section 4.4.3) was expanded to provide more detail on impacts to parklands under each of the three Segment C alternatives. The comment indicates that the discussion of long-term impacts in Section 4.4.2 should have addressed impacts of the ST3 extension. Such impacts would not be directly related to improvements proposed for the Lynnwood Link Extension, because the ST3 extension is a separate project that is independent of improvements associated...
their project is not relative to the Lynnwood Link and this is conjecture, how can ST determine that an administrative building with a bus lot, will draw the same power/water etc. as the OMSF?

53. 4.9.1 Water Resources Affected Environment: Scriber Creek is in the Swamp Creek Basin (Scriber is the largest tributary and contributing area in Swamp Creek), which is listed on the 303(d) list for numerous pollutants. There is an active TMDL for bacteria currently under implementation.

54. 4.5.5 Cumulative Impacts: The statement "rainwater would be intercepted by the non-pollution-generating guideway rather than the pollution-generating roadway" thereby converting PGIS surface to NPGIS - is not accurate and should be stricken from the document.

55. 4.11.3 Construction Impacts: It is unclear why dewatering is not anticipated nor addressed, particularly for the C Segments, given the localized high perched groundwater table, necessary crossing of a wetland, saturated peat soils, and excavation necessary for installation of water quality/quantity treatment facilities (only the shaft foundations were considered in the analysis). Dewatering will be necessary for construction in this area.

56. 4.15: Alternative C-3 directly impacts City of Lynnwood Wastewater Pump Station #10. At the very least there would be impacts during construction, if not permanent. Mitigation / contingencies should be addressed.

57. 4.16.1 Historic Buildings and Structures: Refer to comments above dealing with the Grange building, Interurban Railway and Hall's Lake.

58. 5.1 Evaluation of Alternatives, Ability to Meet Purpose and Need, P. 5-2: states "in the project corridor, the major urban growth centers are at Lynnwood and Northgate, which would be connected by light rail...Moreover, light rail can encourage future private development and investment near stations, which would result in economic benefits that would support redevelopment of Regional Growth Centers of Lynnwood which is the only one served by this project. The July 2013 Transportation Technical Report page 4-100 inventories existing nearby parking on generally underdeveloped private parcels located in the City Center. As mentioned earlier, Sound Transit cannot undersize their parking facility and utilize the existing spaces off premises from the transit center for its parking utilization as this runs counter to the ability to meet the purpose and need encouraging redevelopment and accommodating growth.

42. Table 4-5-1, Alternative C3. The City commented that the impact should be "high" for the existing commercial and planned high intensity mixed use, including multi-family. No change in the low to medium rating is proposed. The existing low visual quality rating on page 4-72 is based on the City's description of the area in the City Center Subarea Plan as "the dominant visual image is wide barren streets, enormous parking lots, signs and strip shopping centers. There is no sense of a center..." and "the general atmosphere is chaotic, congested and devoid of any character..." The low impact rating is based on a change from the existing condition. A moderate impact rating is based on consideration of the future character of high intensity development provided for in the subarea plan and zoning. The projected intensity of development with Floor Area Ratios of 8-10 in the core and 3-5 outside of the core and building height in the core of 15 to 34 stories and 5 to 13 stories outside, will render the scale of the proposed elevated light rail system in
Alternative C3 a relatively minor element within a complex and diverse urban setting.

43. Visual Impacts, Indirect and Secondary Impacts, page 4-89. The City commented that landscaping is not adequate for the tail track in Alternative C3 for mitigation of impacts to a high density zone. As indicated above, the light rail elevated system is anticipated to be just one element of a very high intensity and diverse setting. The reference to landscaping on page 4-89 is in reference to light rail stations providing a focus for mixed use development with landscaping and other visual amenities developed as an integrated part of the new developments.

44. Visual Impacts, Cumulative Impacts, pages 4-89 to 90. The City requested language similar to Northgate. Additional discussion of the intensity and scale of planned mixed use development in the Lynnwood City Center has been added to the Final EIS.

45. Visual Impacts, Potential Mitigation Measures, page 4-93. The City supports landscaping near homes along 52nd Avenue and suggest consideration of earthen berms, coniferous trees, and landscaping for 200th Street and 44th Avenue. The discussion of landscaping on pages 4-91 to 4-93 includes concepts that may be applied as designs are further developed. The text notes that it may take 15 to 20 years for plants to grow large enough to screen large facilities and 30 to 50 years to provide the same functions as existing mature vegetation.

L-004-043

46. 4.7.3 Noise and Vibration. Sound Transit analyzed the properties along the tail tracks in the Draft EIS. Although the hotel property is considered an FTA land use category 2 for noise impact analysis, the noise analysis does not indicate that there will be impacts significant enough to require specific mitigation at that location. See the Draft EIS Section 4.7.3 for the discussion on operational impacts of the project.
Impacts along the tail tracks are not likely due to the slow speed of the train on the trail tracks. If impacts are identified, noise walls would be considered as the primary form of mitigation.

47. 4.7.6 Noise and Vibration. See above response to comment #46 on the tail track. For permitted/approved developments with sensitive uses, Sound Transit performed an analysis as if the property were in place and considered mitigation where impacts were identified. Areas that are zoned for mixed uses but with no permitted or approved developments were evaluated based on their existing use. For the Final EIS, Sound Transit's updates included a review of permitted developments.

L-004-044
Any noise mitigation measures that are necessary for compliance with the FTA and Sound Transit’s Mitigation Policy will be part of the Record of Decision and therefore will be included in the project when constructed.

L-004-045
49. 4.8.1 Affected Environment. The description of the affected environment has been expanded to include more information about wildlife use of the Scriber Creek wetland complex. More detailed information about vegetation and wildlife resources in the study area can be found in the Ecosystem Resources Technical Report. Potential effects related to wildlife viewing opportunities are discussed on page 4-220 of the Draft EIS, in the analysis of effects on Parks and Recreational Resources.

50. 4.8.2 Long Term Impacts. Potential impacts related to changes in the flood storage capacity of the Scriber Creek floodplain are discussed on page 4-156 of the Draft EIS, in the analysis of effects on Water Resources. Potential impacts to the stream channel will be addressed
through the various local, state, and federal permitting processes for this project. For those permits, the stream area that may be impacted by the Preferred Alternative will be identified by delineating the ordinary high water mark (OHWM) of the stream. In low-gradient streams with multiple channels (such as Scriber Creek within the wetland complex in the study area), the OHWM typically encompasses a greater area than the bankfull stream channel. In other words, impacts within the OHWM represent a conservative estimate of stream channel impacts. The impact analyses in the Final EIS reflect the results of these delineations.

51. 4.8.2 Long Term Impacts. Discussions of potential long-term impacts of lighting and noise on wildlife appear on pages 4-135 and 4-136 of the Draft EIS. The analysis in the Final EIS includes additional information about potential effects related to changes in the amounts of noise, lighting, and human activity in the study area, including the Scriber Creek wetland complex.

L-004-046
Section 4.8.5 (page 4-144) of the Draft EIS states that Sound Transit is considering a Link Operations and Maintenance Satellite Facility in the same area as the Edmonds School District master plan. It also states that one or both of these projects may include loss or degradation of vegetation, wildlife habitat, streams, wetlands, and associated buffers. The Ecosystem Resources and Utilities sections do not state that the potential impacts are the same.

L-004-047
53. 4.9.1 Water Resources Affected Environment. The scope of this study focuses only on Scriber Creek because it is located within the proposed project footprint. A brief discussion of the system downstream of Scriber Creek, which includes Swamp Creek, is included for context only. The project would not discharge within the Swamp Creek TMDLs regulated reach; therefore, discussion of its TMDL is beyond the scope
54. 4.5.5 Cumulative Impacts (assuming comment pertains to 4.9.2 Water Resources Long-Term Impacts). The language in the Final EIS will be updated to clarify that the proposed project would result in more stormwater runoff generated by non-pollution-generating surfaces and less generated by pollution-generating surfaces compared to the existing condition.

**L-004-048**
Shaft foundations for Segment C will be completed using cased drilling techniques and methods for placing concrete without the need for dewatering.
Detention facilities are planned in Segment C. If possible, they will be designed to be above the water table. If this is not feasible, dewatering would be necessary for construction of these facilities. The water removed from the excavations would be handled according to the guidelines specified by Washington State Department of Ecology (Stormwater Management Manual for Western Washington). Section 4.11.3 of the Draft EIS notes that if dewatering is required, methods to reduce settlement from dewatering could include using localized dewatering, reinjecting groundwater, using sheet piles for groundwater cutoff, or underpinning nearby structures.

**L-004-049**
The Final EIS discussion of impacts related to the pump station has been updated; Sound Transit appreciates the additional detail on the City's expansion plans.

**L-004-050**
Please see response to comment L-004-040 above.
Although parking is an important component of the access plan for the Lynnwood Transit Center Station, the project's ability to meet the purpose and need does not rest solely on providing parking at levels that might satisfy unconstrained demand. The project would continue to provide speed and reliability benefits to travelers, and it would also encourage higher density development in the surrounding area, which would encourage more biking and walking to reach transit. Community Transit and Sound Transit would also continue to develop and expand service in the area, which could further reduce reliance on the automobile. Sound Transit believes the Draft EIS evaluation of alternatives continued to convey the primary factors distinguishing the alternatives.

Sound Transit will be applying to FTA for New Starts funding and will comply with the August 2013 New Starts and Small Starts Evaluation Rating and Process Final Policy Guidance. Two project justification criteria are related to TOD: economic development effects and land use. Sound Transit will follow FTA's guidance to prepare and submit the required documentation. This effort is not part of the EIS process.

The information regarding property acquisitions in the table of the Draft EIS was accurate. The City has identified an error in Section 4.2 (Land Use) of the Draft EIS that misnamed a single property, but all of the other discussions about properties impacted, including displacements of businesses and employees, were accurate. However, the evaluation has been updated for the Final EIS to specifically note the City's concerns about impacts to the block east of 44th Avenue.