



Shoreline Fire Department
Dedicated to the Protection of Life and Property

FIRE CHIEF
Matt Cowan

COMMISSIONERS
Ken Callahan Rod Hevlin
Jim Fisher Jan Kennison
David Harris

July 29, 2013

The Honorable Pat McCarthy
Chair, Sound Transit Board
401 South Jackson Street
Seattle, WA 98104



RE: Support or Light Rail Station at NE 145th Street in Shoreline

Dear Chair McCarthy:

L-001-001 | The Shoreline Fire Department would like to offer its support for designating a Light Rail Station at NE 145th Street in Shoreline as part of Sound Transit's Lynnwood Link Extension Project.

We strongly support a station at NE 145th and I-5 as it will serve as a regional station. Due to its proximity to Bothell Way NE/Lake City Way NE (SR 522), the NE 145th Street station will act as a regional station for residents of Lake Forest Park, Kenmore, Bothell and potentially points east, and northwest Seattle residents. We believe that convenient access off main thoroughfares is the most appropriate location for a regional station.

L-001-002 | In addition, we are concerned that a station at 155th Street may interfere with our existing Fire Station just east of I-5 and therefore may negatively impact response times due to increased bus and vehicle traffic the station would generate. Further, depending on the specific design of the rail line itself and/or the station and the subsequent increase in traffic, we may have to consider moving the facility all together.

L-001-003 | The City of Shoreline has already begun station area planning which includes increasing density around stations to facilitate transit-oriented development. Part of that commitment is to increase pedestrian and bicycle access and improvements to the road network to facilitate transit to serve the stations. The City is also pursuing ownership of 145th Street in order to improve the transportation facilities for vehicles, buses and non-motorized users; therefore, helping to improve the access to the station.

L-001-004 | The Shoreline Fire Department strongly urges you to designate NE 145th Street as a station location as it supports greater regional access, provides opportunities for improved transit and non-motorized transportation facilities, and allows for greater opportunities for transit-oriented development.

Thank you for your time and consideration of this important issue.

Sincerely,

Matt Cowan, Fire Chief
Shoreline Fire Department

17525 Aurora Avenue North • Shoreline, WA 98133 • PHONE: (206) 533-6500 • FAX: (206) 546-6719
www.shorelinefire.com

L-001-001

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

L-001-002

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.

L-001-003

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.

L-001-004

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.



Draft EIS Comment Form

Submit your comments by September 23, 2013

NAME: Lauren Balisky, Utility Planner, Alderwood Water & Wastewater

ADDRESS: 362W 150th St SW District

CITY: Lynnwood STATE: WA ZIP CODE: 98007

EMAIL ADDRESS: LBAULSKY@AWWD.COM

Please sign me up for project email updates

Sound Transit wants to hear from you. Comments can be about anything related to the project, ranging from giving an opinion or observation to discussing technical aspects of the environmental analysis. The extended public comment period ends September 23, 2013. All comments received or postmarked by this date will be responded to in the Final EIS.

Comments

L-002-001

The main water feed from Awwd to the City of Mountlake Terrace follows the Interurban south along I-5 to 44th Ave W @ the pedestrian bridge. Please work with the District to ensure that supply is maintained during construction.



L-002-001

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.

Mayor
Mary Jane Goss
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Councilmembers
Don Fiene
Tom French
Jeff R. Johnson
Sandy Koppenol
Robert E. Lee
Catherine Stanford
John A. E. Wright

September 18, 2013

Sound Transit DEIS Comments
c/o Lauren Swift
401 S Jackson St.
Seattle, WA 98104

RE: Support for Siting Light Rail Station at 145th in Shoreline

Dear Sound Transit:

L-003-001 The City of Lake Forest Park has a vital interest in the outcome of the final decision on the siting of the Link stations for the Lynnwood Link Extension. Our residents have supported the objectives of Sound Transit since its inception and have long anticipated the promise of service commensurate to accommodate the need for regional transit service to the north-end cities beyond Seattle city limits.

Sound Transit representatives updated the City at our May 9, 2013 City Council meeting regarding the status of the Link stations still under study.

We would like to express our support of the following:

- Alignment of the Link Light Rail along the east side of the I-5 alignment through segments 'A' and 'B'.
- Locating segment 'A' stations at NE 145th and NE 185th Streets, as supported by the City of Shoreline.
- Providing adequate Park N Ride facilities at or very near Link stations is extremely important for system access by our citizens.
- Providing adequate bus capacity to serve the communities close to the stations.
- Designing stations to preserve the free-flow of east/west vehicular traffic, bicycle and pedestrian access across the I-5 alignment and to prevent choke points.

L-003-002 The City Council of Lake Forest Park recently passed the Southern Gateway Sub Area Plan zoning changes which allows for residential development and higher density along the SR-522 corridor beginning at 145th. The City committed significant time and resources to this planning effort, recognizing the need for housing along the transit corridor.

L-003-001

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.

L-003-002 | 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



A Great Deal more

EXECUTIVE

September, 19, 2013

Joni Earl Chief Executive Officer
Central Puget Sound Regional Transit Authority
401 Jackson St.
Seattle WA 98104-2826

RE: City of Lynnwood Comments, Lynnwood Link DEIS

Dear Ms. Earl,

The City of Lynnwood's Vision, "Lynnwood Moving Forward Our Community Vision" (unanimously adopted in January 2009) states:

To invest in efficient, integrated, local and regional transportation systems.

This vision statement is totally consistent with, and the City has long supported bringing ST2 Light Rail Transit into the Lynnwood Transit Center. This transit facility is located in our PSRC designated Regional Growth Center.

L-004-001

Our staff has devoted substantial effort to working with Sound Transit on the initial development of the project. Our City has also focused on the potential future ST3 by undertaking a City funded study of how the LRT may be extended to have a station to serve our City Center.

The City's administrative staff has conducted a detailed review of the DEIS. I am submitting our administrative comments (fifteen pages September 3, 2013) on the DEIS to be considered prior to Sound Transit's selection of a preferred alternative and completion of the FEIS. Please note that these comments do not include comments or recommendation as to a route or station location. The Lynnwood City Council will be considering a resolution designating a recommended alignment and station location at their September 23rd meeting. The resolution will be emailed to you on the evening of September 23rd.

L-004-002

The City has several major concerns with the DEIS that can be summarized as follows:

- We believe traffic impacts on City streets will be considerably worse than presented.
The City has concerns with Sound Transit's decision to undertake a separate analysis of the Operations, Maintenance and Service Facility (OMSF), since the projects are clearly linked to one another.

L-004-003

L-004-001

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

L-004-002

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.

L-004-003

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.

- L-004-004** |
 - Sound Transit's expectation that 80% of riders will arrive by bus appears to be very optimistic. Failure to achieve this goal will result in significant traffic congestion and an extreme shortage of parking which will substantially interfere with properties in the area and will quite probably impact negatively our ability to achieve the goals of Lynnwood's City Center Plan.
- L-004-005** |
 - The analysis of C3 contains substantial errors as to which properties east of 44th Ave. will be demolished and taken. Further, C3 fails to consider impacts on our critical Lift Station 10 which is planned for expansion, has associated odor issues, and there is localized flooding in the same area.
- L-004-006** |
 - The DEIS fails to consider the implications that decisions made now with ST2 will pre-determine impacts that the potential ST3 will have on the City Center block located east of 44th Ave.

L-004-007 | On behalf of the City I want to thank you for considering the City's administrative comments. I especially and sincerely appreciate your willingness to agree to my request that the DEIS comment period be extended substantially beyond the normal time period. This was very helpful for many of our residents to participate when they would have otherwise been doing summer vacations or related activities.

Sincerely,



Don Gough
Mayor, City of Lynnwood

CC: Sound Transit Board
Steve Kennedy, Sound Transit Staff

Attachments

L-004-004

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.

L-004-005

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.

L-004-006

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.

L-004-007

Thank you for your comment.

**Sound Transit Lynnwood Link DEIS
City of Lynnwood Comments
September 3, 2013**

L-004-008

L-004-009

L-004-010

L-004-011

L-004-012

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

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.

L-004-012

Mall Boulevard and I-5. This block is located within Lynnwood’s City Center-Core which is planned for the highest density urban development in Lynnwood. Redevelopment of this block is critical to realizing the goals of the City Center Plan and also to achieving the goals of the State Growth Management Act and designated Puget Sound Regional Council’s Regional Growth Center. Impacts of the planned but as yet unfunded ST3 extension in this area must be assessed to provide a full analysis of the impacts from Lynnwood Link. As presently designed, the C1 alignment would allow for the track extension to align with Alderwood Mall Boulevard offering the probability of the lowest amount of impact on the City Center Core block for the future extension. C2 has some potential for impacts from a future extension on the southwest corner of the City Center Core block although the City has been informed that it may be possible to route the track in the vicinity of I-5 and the Interurban Trail thereby minimizing impact on the block. C3, whose tail track has a significant immediate impact upon the City Center Core block in the current ST2 phase of Sound Transit’s expansion, under ST3 results in splitting the triangular block in half rendering it difficult or impossible to redevelop in any meaningful manner. Further, is this centerline is extended further it appears that additional City Center blocks further east could be impacted as well. We also note that the DEIS erroneously states that C3 will require removal of the La Quinta Inn when in fact it will require removal of a multi-story office building located west of the hotel. The La Quinta appears to be able to remain at this point although it appears that it could be significantly impacted by having the tail track proximate to and aimed at their upper floors. As such Alternative C3 removes this block slated for the highest density development in the Lynnwood Regional Growth Center from being utilized as planned and runs counter to both the purpose and need statements (pages S-2, 1-4, 1-5 and 5-2) for the Lynnwood Link project and to the Federal New Starts Economic Effects criteria to support the project’s funding (p. 5-13).

L-004-013

4. **General Comment:** Sound Transit is assuming the some 16,000 of the 20,000 daily boardings at Lynnwood will be arriving by bus in the form of intermodal transfers. The DEIS does not appear to contain an analysis of whether the bus providers have sufficient capacity to handle this increase in ridership and if not, how they will be able to obtain funding to achieve it. The City is also critically concerned that the significant increase in bus movements combined with parking for 500 additional cars, most of which would occur during a short period of time (peak hours) will significantly impact Lynnwood’s street system in ways the DIES fails to analyze. While some of the bus routes will use the direct ramps to I-5, many more along with all the automobile traffic will use local streets that already have capacity issues. In addition, many of the commuters will arrive from points north of Lynnwood. The closest I-5 interchange this traffic can use is at Poplar Way. Sound Transit’s traffic analysis fails to assess this impact.

L-004-013

An analysis was conducted regarding the capacity of local bus service to accomodate 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.

L-004-014 5. **General Comment:** All references to Lynnwood creating a Town Center need to be changed
2 to City Center.
3

L-004-015 6. **S.2 Purpose and Need for the Lynnwood Link Extension, P. S-2:** Purpose and need for the
5 Lynnwood Link Extension: The project is needed to... *Create the transit infrastructure*
6 *needed to support the development of Northgate and Lynnwood (language proposed by the*
7 *City)- the corridor's two designated Regional Growth Centers.*
8

L-004-016 7. **S.9, P. S-31 and 5.3.4, P. 5-15 Areas of Controversy and Issues to be Resolved:** The DEIS
9 claims that both Lynnwood and the Edmonds School District "expressed concerns"
10 regarding the potential location of the Operations and Maintenance Satellite Facility
11 (OMSF), in Lynnwood. This statement incorrectly characterizes the positions of the City and
12 School District. Both Lynnwood and the District opposed the designation of an OMSF site
13 in Lynnwood in writing (in Lynnwood's case a Resolution adopted by the City Council) and in
14 verbal comments offered at the ST Board Public Hearing. The many obvious flaws of this
15 site were pointed out including its location directly across the street from hundreds of
16 affordable homes, impact to critical wetlands and the fact that the School District has
17 approval to build their Administration complex on the site. Both the City and District asked
18 the ST Board to eliminate the Lynnwood OMSF site from consideration. The Board went
19 ahead and approved consideration of the site along with others in Bellevue. It is also
20 significant to note that the two Board representatives from Snohomish County stated on
21 the record that by voting to approve consideration of the Lynnwood site, they understood
22 its many flaws. Further, it was their desire to see an OMSF located not in in Lynnwood, but
23 rather near Payne Field when ST3 is built.
24
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L-004-017 8. **Table 2-1c Alternatives Considered, Summary of Design Features for Segment C**
27 **Alternatives, P. 2-13:** Description of the alternatives ends at the Lynnwood Transit Center.
28 The table fails to mention that the C3 tail track will extend across 44th Ave and require
29 removal of buildings east of 44th or the resulting impacts from ST3 extensions that would
30 result from ST2 decisions.
31

32 9. **2.5.2 Alternatives Considered, Developing Details of the Alternatives, P.2-35:** "The
33 evaluation criteria included the following factors: ... Station area development potential
34 (existing land use and transit-oriented development potential". The DEIS focuses on existing
35 land use for alternative C3 and fails to mention impacts of C3 on the high density
36 development potential dividing the block north of 44th in half with its tail track. We disagree
37 that the alternative C3 station location has the same development / TOD potential as C1
38 and C2 which are closer walking distances to the City Center, (within the PSRC Lynnwood
39 Regional Growth Center slated for highest development potential in Lynnwood). P. 4-18
40 states that Segment C ends within the Lynnwood City Center, inside of the PSRC -

Sound Transit Lynnwood Link DEIS - City of Lynnwood Comments - Sept. 3, 2013 - Page 3 of 16

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.

L-004-017
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designated regional growth center, which is anticipated to accommodate much of the growth between Northgate and Everett. If this growth is to be accommodated, then the impacts of eliminating the development potential of a large block of the highest density in City Center, needs to be clearly identified and mitigated.

L-004-018

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- 10. 2.8.1 Link Operations and Maintenance Satellite Facility:** This section contains several factual errors and misstatements. The fact that analysis of the OMSF has been severed from the Lynnwood Link DEIS remains a questionable decision and tactic. ST has made it clear that ST2 cannot operate without an OMSF being built somewhere thus the projects are inextricably linked. Under Washington environmental law they would be required to be analyzed together.
- 11.** The DEIS purports that the OMSF DEIS will be issued “in late 2013 or early 2014”. We have recently been informed that due to unspecified problems the release date is being pushed back to the summer of 2014. This is particularly unfortunate since Lynnwood residents and homeowners who will be severely impacted by the OMSF will not have any certainty regarding their future for a protracted period of time. During this time they conceivably will have difficulty in selling their homes or deciding if repairs or improvements are warranted.
- 12.** The DEIS states that “because the projects have independent utility” this DEIS does not analyze the impacts of the OMSF. The City questions how it can be concluded that the OMSF has independent utility? “But for” ST2, Lynnwood Link and other planned extensions, the OMSF would not exist. Then the text goes on to actually discuss some of the potential impacts of the OMSF in somewhat favorable terms which violates the supposed separation between the two projects while being misleading and erroneous.
- 13.** It is noted that the OMSF would occupy parcels of land needed for the School Districts support center but then concludes that if the site is selected ST would work with the District on joint use. In fact, ST has attempted to work with the District on joint use and has been rebuffed being informed that the School District Service Center will be moving forward. Further, the DEIS fails to state that ST has no ability to exercise eminent domain over District property.
- 14.** The text also asserts that “potential cumulative effects” of the OMSF have been analyzed in this DEIS. ST staff has repeatedly told City staff that the OMSF would need to be completed and opened well in advance of the completion of Lynnwood Link to prepare rail cars for service. The opening date for the OMSF is marketed as 2020 whereas the tracks will not be completed to Lynnwood for another three years. As such, there should be no cumulative construction impacts. If anything, there will be sequential impacts where construction

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.

L-004-018 | activity will go on for years. The text needs to be revised. Either all OMSF impacts should
2 | be analyzed or none should and the positions of the parties should be accurately presented.
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L-004-019 | **15. 3.1.7 Parking, P. 3-16:** The DEIS offers an analysis of on-street and private parking
5 | availability proximate to the three C alignments in Lynnwood without clarifying why this
6 | exercise was undertaken or potential implications. The only conclusion we can draw is that
7 | this represents a back-door plan for ST to find ways to utilize parking outside of the transit
8 | center for commuters. This is completely unacceptable to the City. On-street parking is for
9 | the use of local residents or customers, not commuters. Similarly, privately owned parking
10 | in City Center represent a major part of the areas potential to support redevelopment
11 | consistent with City plans, State Growth Management Act and the Puget Sound Regional
12 | Council's Vision 2040. Off-site parking is completely unacceptable to the City. ST is being
13 | asked to eliminate this analysis from the DEIS and commit to the City in writing that there is
14 | no intention or plan to seek commuter parking outside of what can be accommodated
15 | within the Lynnwood Transit Center.
16

L-004-020 | **16. 3.2.4 Arterials and Local Streets, P. 3-37 / 3.4 Indirect and Secondary Impacts, P. 3-48 / 4.1**
18 | **Acquisitions, Displacements and Relocations P. 4-3:** The majority of the southbound traffic
19 | of the to the Lynnwood ST2 terminus will come from points north on I-5 and enter the City
20 | Center at the only available southbound interchange in this area at 196th SW (SR 524).
21 | This access will significantly increase traffic impacts not only at that interchange and off-
22 | ramp into the City Center, but through the entire City Center street system to access the
23 | transit center. Traffic will be required to traverse local, collector and arterial streets
24 | resulting in significant impacts. This will be compounded by the large increase in bus traffic
25 | resulting from the fact that ST is projecting that 89% of the 20,000 riders each day will arrive
26 | by bus. Studying only a 0.5 mile radius is inadequate in this case. The intersections from the
27 | I-5 / 196th off-ramp to 40th Ave. W need to be studied.
28

L-004-021 | **17. 3.2.7 Parking, P. 3-39 / 3.6.7 Parking, P. 3-54:** It is noted that if spillover parking occurred in
30 | Lynnwood it would be onto private property (in the City Center this parking is planned for
31 | high density redevelopment to accommodate regional growth) which the City would then
32 | need to patrol locally. This spillover parking is an unacceptable result. It would damage the
33 | City's ability to achieve the goals of the City Center Plan while adding to the City's cost to
34 | patrol and manage. The text also states the amount of parking provided at each station
35 | may be further refined in future phases. The parking proposed for the Lynnwood station
36 | needs to be sized appropriately to reasonably accommodate the projected 20,000
37 | boardings per day.
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L-004-022 | **18. 3.5 Transportation Cumulative Impacts, P. 3-48:** 1) This section does not address the
40 | impact to the residential neighborhood adjacent to the OMSF with the increase in late night

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L-004-019

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.

L-004-020

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

L-004-021

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.

L-004-022

Issues related specifically to the OMSF are being addressed through that project's independent EIS review process.

L-004-022 | trips from midnight - 5 am which may be disruptive to the sleeping residents. 2) Strike the
2 | references relating to the ESD plans, as this has no relation to the Lynnwood Link project
3 | (additionally it omits that the administrative building will buffer the bus fleet to the street
4 | and residents). 3) Any discussion of the OMSF in Lynnwood should also include the
5 | requirement for a second smaller OMSF facility being still required in Bellevue. It should
6 | also note that if the OMSF is built in Bellevue, no facility would be needed in Lynnwood.
7 |

L-004-023 | **19. 3.6.3 Transportation - Freeway Operations, P. 3-49:** DEIS text should be corrected as
9 | follows: “or may affect adjacent freeway ramp operations” to “or may affect nearby primary
10 | access freeway ramp operations” or similar. The adjacent freeway ramp at I-5/44th is only a
11 | half interchange and does not provide the access from the northern boarders that the I-
12 | 5/196th off-ramp will.
13 |

L-004-024 | **20. Table 3-27 Transportation, Segment C Potential Mitigations, P. 3-53:** Restriping the
15 | 200th/44th intersection as proposed is not sufficient to accommodate 20,000 daily boardings
16 | at an already low functioning roadway particularly during the PM peak. Plans should study
17 | widening City Center streets to accommodate ST’s projected vehicular and transit trips on
18 | 200thSt SW, 40th Ave W and 48th Ave W.
19 |

L-004-025 | **21. 4.1 Acquisitions, Displacements and Relocations:** Information concerning some of the
21 | impacts of the three track alignments in Lynnwood is missing or contains errors:
22 | (1) In all cases there is a failure to analyze the impacts of extending any of the C alternatives
23 | under ST 3 even though they are directly linked to alignment decisions made in ST2.
24 | (2) Information concerning the impacts of C3 is erroneous. The DEIS indicates that C3 would
25 | result in the removal of one business, the La Quinta Inn hotel east of 44th Ave. This is
26 | incorrect since the tail track must impact one or two other commercial buildings west of the
27 | hotel before it can get there. This concern was raised to ST staff who indicated an error had
28 | been made in the DEIS. Apparently the hotel will not be fully taken in ST2 but a multi-story,
29 | multi-tenant commercial building would be. Clarifications and updates to all related items
30 | are necessary. The DEIS fails to analyze the potential for increased costs and impacts due to
31 | inverse condemnations of other properties in the vicinity.
32 |

33 | **22.** It is evident that the La Quinta hotel would need to be taken in ST3 if C3 is selected in ST2.
34 | The hotel would also have impacts under ST2 related to the end of the tail track pointed at
35 | and close to the building. The DEIS also fails to accurately indicate impacts that would
36 | result from C3 to businesses located near I-5. Because of these errors, the true cost of C3 is
37 | misstated and likely is greater than indicated. It is not possible to accurately weigh the pros
38 | and cons of the C1/2/3 alignments without this critical information taken into account.
39 |

L-004-023

The sentence will be updated as suggested.

L-004-024

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.

L-004-025

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.

L-004-026

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23. 4.1.1.5 Cumulative Impacts, P. 4-9 and Appendix H - Other Projects Considered for Cumulative Effects, P. H-3 and H-4: The Lynnwood City Center should be included in these sections. The recently approved 308 unit Lynnwood City Center Senior Living Apartments on 1.8 acres located at 19501 40th Ave. W in the City Center should also be included separately, as these are as relevant to the Lynnwood Link as both the Mountlake Terrace Senior Living Apartments and the Mountlake Terrace Town Center plan are. The Poplar Way Bridge across I-5 at 33rd Ave. W should also be included as this will impact off-ramp access and finally the 196th widening and addition of possible Bus Rapid Transit Lanes should also be included in the evaluation.

L-004-027

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24. Section 4.15 Cumulative Impacts: Alternative C-3 directly impacts City of Lynnwood Wastewater Pump Station #10 and associated piping under the existing transit station parking lots. The City Center Sub-Area Plan (September, 2007) states the following: *All of the wastewater generated in the City Center Sub-Area flows to Lift Station 10, either by gravity or from force-mains associated with pump stations No. 4 and 8. Flow collected at Lift Station No. 10 is pumped to a 36-inch interceptor line via a 9,500 ft 24-inch force main, where it then gravity flows to the treatment plant. The capacity of Lift Station 10 is 6,000 gallons per minute (8.84 million gallons per day). Since existing peak hour flows exceed the capacity, modifications to Lift Station No. 10 will be required, or construction of a new lift station to bypass a portion of the flow.* There are likely impacts to the station in the existing condition, and necessary expected upgrades. At a minimum, there are likely temporary impacts during construction. The pump station was not even identified in the EIS, let alone any potential impacts analyzed. Impacts to this essential public facility must be analyzed and addressed. Further, there are odor issues associated with the lift station that would become an issue if the LRT station and bus bays were located adjacent to it as proposed. Finally, there are localized flooding issues in this area that ST appears to have overlooked.

L-004-028

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25. Table 4.2-1, Locally Adopted Plans and Policies, P. 4-13: City of Lynnwood Plans should also include:
➤ City Center VMT & CO2 Emissions Modeling Report, January 2010;
➤ ULI Innovations TOD Workshop June 25, 2009 - Lynnwood Station Team Presentation;
➤ Extension of Light Rail to Lynnwood City Center Technical Memorandum, August 2011
➤ City of Lynnwood Economic Development Action Plan, 2005-2010

26. 4.2.1 Affected Environment, P. 4-18: DEIS text should be corrected as follows:
"Lynnwood's zoning regulations and design guidelines support a ~~mixed use~~ high-density ~~neighborhood development~~ in the City Center near the existing Lynnwood Transit Center, which is composed of three districts. The density ~~types of use~~ permitted varies among the districts. All Segment C station alternatives are located in the "City Center West" zone, envisioned to have a mix of high density mixed-use residential, retail, restaurants, and office, ~~and high-density housing~~. The tail track of Alternative C3 would cross 44th Avenue West into the center of the large block of the higher density "City Center Core" zone, the

L-004-026

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.

L-004-027

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.

L-004-028

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

L-004-028
2 highest density permitted in the Lynnwood Regional Growth Center and citywide.” The
3 implications of this tail track combined with the ST3 extension resulting from this alignment
4 require further evaluation.

L-004-029
6 27. 4.17.1 Affected Environment, Parks; P. 4-220: Scriber Creek Park, Alternative C1. It states
7 that approximately 0.42 acre of the park would be directly affected. This is a small, pastoral
8 park and the impact from and overhead LRT line is understated. It further states that the
9 elevated guideway would change the experience of the parking lot. We would add that,
10 depending on the location of the support columns, it could potentially eliminate parking
11 spaces needed for the park. Under Alternative C2, it is states that the park is not
12 considered noise sensitive due to higher ambient levels and its activities do not require
13 quiet surroundings. Scriber Creek Park is a passive natural park with no active recreation
14 facilities. Within the interior of the park street noise is negligible most of the day; park
15 users enjoy bird watching and quiet walks through the park accompanied by the sounds of
16 birds, frogs, etc. The park currently provides a quiet environment for these passive
17 recreation activities. We would request that noise mitigation be provided for the park and
18 the trail if required to achieve the existing ambient noise level.

19 28. 4.17.6 Potential Mitigation Measures p 4-225, Scriber Creek Park. Further research has
20 revealed that the acquisition of the park property was funded by a grant from the
21 Snohomish County Conservation Futures Program in 1991. The Interlocal Agreement
22 describes the use of the “real property forever for purposes consistent with the
23 preservation, protection and maintenance of the property for open space.” In addition the
24 Deed of Right to Use Land for Open Space Purposes states “The Grantor (City of Lynnwood)
25 will not make or permit to be made any use of real property.... Or any part of it which is
26 inconsistent with the right of use for public open space purposes herein granted unless such
27 use is authorized by applicable law and the County consents to such use.”
28

L-004-030
29 29. 4.18.5 Potential Impacts on Section 4(f) resources, p 4-241, The DEIS states that Scriber
30 Creek Park is not considered a noise-sensitive resource. As a passive and natural
31 recreational facility, noise from trains and direct construction would impact the park in
32 ways the DEIS fails to analyze.
33

L-004-031
34 30. 4.2.2 Long Term Impacts, P.4.27: Segment C Mountlake Terrace to Lynnwood: DEIS text
35 should be corrected as follows: “Segment C extends to the proposed Lynnwood Transit
36 Center stations and the just into the far southwest corner of the City Center subarea. The
37 proposed stations would be on the east end of the City Center West zone. This zone is
38 envisioned to include a dense mix of commercial (office, retail, and service) uses and a
39 concentration of mid-high density mixed-use residential units. In Alternative C3 the tail
40 track would cross over 44th Avenue West ending in the middle of a block in City Center Core
41 zone, which otherwise would accommodate higher-density mixed-use development.”
42

L-004-032
43 31. Alternative C2: “Alternative C2 would acquire and “convert” fewer properties than
44 Alternative C1, and it would not convert any multifamily residential properties.” It may not
45 “convert” it has the potential to impact a multi-family apartment property with its
46 adjacency as it runs into the Transit Center If noise mitigation is not provided.

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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.

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L-004-032 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 only one existing use (La Quinta Inn) 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).

L-004-034 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.

L-004-035 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.

L-004-036 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

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

L-004-036
2 amount of developable land in close proximity and Mountlake Terrace is not a designated
3 Regional Growth Center. We would also argue that Lynnwood's TOD potential is on par with
4 Northgate's. Further since Northgate has already seen significant intensification long before
5 the arrival of LRT, going forward in the timeframe of Lynnwood Link, Lynnwood City Centers
6 potential is much higher. Within the Lynnwood Transit Center we also take exception with
7 the equal ranking of TOD potential for all of the alignments and station locations. C1 with a
8 station proximate to 200th and City Center clearly has the greatest potential. C2 offers
9 decreased but still significant potential particularly if ST actively encourages redevelopment
10 over their property. C3 has a station located in a remote and largely hidden site far
11 removed from developable property, City Center and pedestrian access. The C3 tail track
12 and its extension under ST3 also eliminate major potential TOD sites east of 44th Ave. C3 is
13 focused on serving commuters rather than being supportive of TOD and meeting the goals
14 of the City Center Plan. The City believes that in so doing C3 does not meet the criteria
15 required under the Federal New Starts program that will be providing essential funding.

L-004-037
17 **36. 4.2.2 Economics Impacts of Displacements on Tax Base for Cities, P. 4-41:** Revenue
18 potential for the highest density zone in the City Center under the C3 alternative will be
19 significantly impacted by tail track construction into middle of the block. This will be further
20 exacerbated by the extension of the line under ST3. These impacts must be analyzed and
21 considered.

L-004-038
22 **37. 4.2.5 Cumulative Effects, P. 4-34:** If the OMSF is to be open by 2020 construction will not be
23 concurrent with the Lynnwood Link Extension completed by 2023. Thus there will be no
24 simultaneous construction activity to take advantage of. In fact, the opposite is true. Due
25 to construction schedules the surrounding area will be impacted by construction activity for
26 an excessively protracted period of time. The DEIS and its assumptions must be corrected.
27

L-004-039
28 **38. 4.3.5 Economics Cumulative Impacts, p 4-46:** The DEIS states that the OMSF would have
29 similar or greater multiplier effects on the regional economy as the Lynnwood Link. While
30 we question this conclusion we note that the impacts on the local economy are much more
31 significant. The OMSF does not offer realistic TOD benefits to Lynnwood or support for City
32 Center development in the way Lynnwood Link can (depending upon the route alternative
33 that is selected). The employment benefits are unlikely to accrue locally. In fact, in OMSF,
34 as an inappropriately located heavy industrial use, creates much more significant negative
35 cumulative impacts for the City and our residents and businesses.
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L-004-030
37 **39. Figure 4.4-4c Social Impacts, Community Facilities Within 0.5 Mile of Light Rail**
38 **Alternatives, P. 4-55:** The DEIS fails to consider significant community facilities in
39 Lynnwood.
40 Cedar Valley Grange
41 Area of Potential Impact is described as the geographic area within which an undertaking
42 may directly or indirectly cause alterations to the character or use of a historic
43 property. The Cedar Valley Grange (Originally Hall Lake Grange and founded in 1909) was
44 moved to its present location in 1948. Although the building exterior has been remodeled, it
45 is the oldest social organization in the Lynnwood area still in existence with the early rosters

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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

L-004-040

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including many of the pioneer families. It would be considered eligible for the Lynnwood Register of Historic Landmarks by age and by its exemplifying the cultural, social, or historic heritage of the City. The evaluation of buildings considered "historic" in the report focused on building structures, rather than the role which the buildings and their occupants played in the area history.

To be eligible for registration on the National Register of Historic Places (NRHP), it must meet one of four criteria including the following: "A. That are associated with events that have made a significant contribution to the broad pattern of our history...". Given the role the Grange played in the history of Alderwood Manor and later the City of Lynnwood, it should be considered eligible for the Register. Once a historic resource is identified and evaluated, Criteria of Adverse Effects are applied which include alteration of the property' setting and the introduction of visual, audible, or atmospheric elements that are out of character with the historic property.

Given its location within the 200 foot Area of Potential Impact Zone, the Cedar Valley Grange should be considered subject to an Area of Potential Effect. While the Grange building may not be directly impacted by the construction of Routes C1 and C2 with little impact created by noise and vibration, long-term effects will continue as the proposal is in operation which will impact the site's visual effects, integrity of setting, feeling and association with the surrounding community. Certainly, the OMSF, which is a heavy industrial use that would be located directly across the street from the Grange, would have a significant impact.

Interurban Railway

Although the Interurban Railway has been determined from the scope of this project not to be eligible for NHRP listing, it played a significant role in the shaping of the Alderwood Manor/City of Lynnwood community. In Part 2, Page 8-2, of the Cultural, Archaeological, and Historic Resources Technical Report, no detailed mention is made of the routing of the Interurban (though details are provided for the King County portion of the railway) and its impact on Lynnwood and the surrounding Snohomish County communities. Mention should be made that while both Routes C1 and C2 will impact the route of the railway by crossing over it, Route C3 has a major impact on the aesthetic, noise and visual aspects of the Interurban, with the line paralleling the route of the Railway for between a quarter to a half mile.

Hall's Lake

Although the Hall's Lake and the Hall's Lake Church Camp have been determined from the scope of this project not to be eligible for NHRP listing, activities associated with them played a significant role in the shaping of the Alderwood Manor/City of Lynnwood. Besides being the location of the camp, Halls Lake featured a saw mill which milled much of the timber logged during the early development of the community. Route C3 crosses a corner of the property associated with the site and one building with ties to the camp may be removed adjacent to 54th Avenue W.

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

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In summary, the construction of Routes C1, C2, and C3 will have an impact on historic resources associated with the Alderwood Manor/Lynnwood community, especially Cedar Valley Grange and the Interurban Railway route. We ask that these impacts be analyzed and mitigation proposed as appropriate. We also request that in the design for the station, consideration be given to the construction of displays that highlight the historic resources that have been impacted.

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40. 4.4.2 Social Impacts, Long Term Impacts, page 4-59: Segment C analysis contains previously mentioned errors regarding impacts from C3 and failure to consider ST3 extensions under any alignment.

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41. 4.4.4 Social Impacts, Indirect and Secondary, P. 4-61: The following statement conflicts with the outcome of Table 4.2.3 for TOD potential. Lynnwood’s overall TOD potential should be as stated in comments above. “Construction of the light rail transit facilities could influence real-estate market forces that could increase the potential for transit-oriented development at some station locations as permitted by local zoning regulations. Such changes may be greater in the Lynnwood City Center neighborhood, where transit-oriented development potential is most likely, but most of the immediately surrounding area is characterized by commercial, light industrial, or parking uses. See Section 4.2.2 in Section 4.2, Land Use, for a discussion of long-term changes in land use. Moderate levels of redevelopment may occur in station areas in Mountlake Terrace and Shoreline.” This text contradicts Lynnwood’s overall TOD potential in Table 4.2-3 equaling Mountlake Terrace Transit Center Station.

L-004-042
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42. Table 4.5-1, Visual Impacts, Potential Visual Impacts, P. 4-82: Alternative C3 in the 44th Ave W corridor is a high impact (not low to medium) to the existing commercial and planned high density mixed use that can accommodate multi-family residential growth.

43. 4.5.4 Visual Impacts, Indirect and Secondary Impacts, Page 4-89: Landscaping is not adequate for the tail track C3 mitigation running through a high density zone to support City Center redevelopment plans including multifamily.

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44. 4.5.5 Visual Impacts, Cumulative Impacts, P. 4-89, 4-90: Add similar language as Northgate above in this section for Lynnwood City Center redevelopment plans.

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45. 4.5.6 Visual Impacts, Table 4.5-2 Potential Mitigation Measures, , P. 4-93: We note that Sound Transit is proposing establishing a landscape screen near homes located along the west side of 52nd Ave under the C1/ C2 alignment options. This is an excellent idea since landscaping proximate to the track structure is unlikely to be effective in buffering the homes due to their proximity and topography. ST should consider the potential for building earthen berms and planting coniferous trees long it to improve effectiveness. Add 200th to relocated streets (potential widening) and Landscape Screen for 44th as C1 and C2 have the tail track against boulevard, for visual impact in City Center.

part of the separate NEPA/SEPA analysis being performed for that project.

L-004-040

The Final EIS evaluates potential adverse impacts on the Cedar Valley Grange Hall and the Interurban Railway. The Cedar Valley Grange Hall was added to Figure 4.4-4C, Community Facilities Within 0.5 Mile of Light Rail Alternatives. The Hall Lake Church Camp was not evaluated because it is not an existing community facility. In order to be eligible for listing in the National Register of Historic Places, a property must meet one of several criteria and possess integrity of location, design, setting, materials, workmanship, feeling and association. The Cedar Valley Grange Hall lacks integrity of location, setting, design, materials and feeling. It has been altered with a prominent front entry addition, which changes the design, as well as replacement cladding and window sash made of modern materials. Its setting and location have also been changed. Therefore, FTA determined, and the State Historic Preservation Officer (SHPO) concurred, that it is 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 the local importance of the Cedar Valley Grange, Section 4.4.2 of the Final EIS was revised to evaluate potential impacts to this community facility, but concludes it will not be affected by the proposed light rail 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

- L-004-043** 2 **46. 4.7.3 Noise and Vibration, Alt C3 Noise Impacts, P.4-121:** No analysis of the tail track
3 turnaround noise impact on hotels and properties. Hotels adjacent may have impacts to
4 guests staying overnight and impacts for TOD potential mixed use. A church use is identified
5 for C1, so including analysis of these impacts for C3 would be consistent.
- 6 **47. 4.7.6 Noise and Vibration, Cumulative Impacts, P. 4-124** states that “Because Sound Transit
7 is mitigating all noise and vibration impacts (as defined by exceeding applicable FTA, state,
8 or local criteria) created by the project, the project would not increase cumulative noise or
9 vibration impacts, considering other current or future actions in the project area.” Future
10 actions as described here should include currently adopted City Center Sub-Area Plan within
11 the PSRC designated Regional Growth Center to accommodate high density residential and
12 commercial uses. C3 tail track impacts on this future action are not currently considered in
13 the EIS and need to be.
- L-004-044** 14 **48. 4.7 Noise and Vibration, Cumulative Impacts, Page 4-126:** The DEIS appears to accurately
15 portray the potential for noise impacts to homes under each of the C track alignments. It
16 then states that “Noise impacts could be mitigated by a 4-6’ tall barrier” along the tracks.
17 The City is seeking confirmation that these noise barriers will be designed into the project.
18
- L-004-045** 19 **49. 4.8.1 Affected Environment:** This section does not include a discussion of fauna that use
20 the C-Segment sites, but may not be listed under ESA. Species may be impacted that have
21 local significance, including birds and mammals (for example - river otters frequently use
22 Scriber Creek and regional wetland). Disruption to these species would have significant
23 emotional impact for locals who take enjoyment in viewing opportunities. This should be
24 acknowledged and the impact assessed.
- 25 **50. 4.8.2 Long Term Impacts:** Impacts to Scriber Creek are understated. Scriber is
26 definitively channelized, contrary to statements made otherwise (particularly as it relates to
27 C-2). This area frequently experiences flooding, backing-up, and flooding of properties
28 immediately upstream. Any activity which may impede capacity, or affect our ability to
29 maintain the channel must be acknowledged and avoided.
- 30 **51. 4.8.2 Long Term Impacts:** There is no discussion of the impact of lighting and noise on
31 the wetland affected by the C-segments. Increased light and noise directly over the Scriber
32 Regional Wetland will impact animal use (particularly nocturnal animals – beaver and
33 raccoons), and nesting birds. Predation of aquatic animals will increase as aquatic visibility
34 increases. Noise and vibration may push out resident mammals (such as the river otters, or
35 beavers) into surrounding areas.
- L-004-046** 36 **52. 4.8.5 Ecosystem Resources, Cumulative Impacts, Page 4-144:** states potential impacts of
37 school district’s administrative facility, and 4.15.4 on page 4-196 states the indirect and
38 cumulative impacts of the School District facility as the same as the OMSF, please remove as
39

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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

- L-004-046
2 their project is not relative to the Lynnwood Link and this is conjecture, how can ST
3 determine that an administrative building with a bus lot, will draw the same power/ water
4 etc. as the OMSF?
- L-004-047
6 **53. 4.9.1 Water Resources Affected Environment:** Scriber Creek is in the Swamp Creek
7 Basin (Scriber is the largest tributary and contributing area in Swamp Creek), which is listed
8 on the 303(d) list for numerous pollutants. There is an active TMDL for bacteria currently
9 under implementation.
- 10 **54. 4.5.5 Cumulative Impacts:** The statement "rainwater would be intercepted by the non-
11 pollution-generating guideway rather than the pollution-generating roadway" thereby
12 converting PGIS surface to NPGIS - is not accurate and should be stricken from the
13 document.
- L-004-048
16 **55. 4.11.3 Construction Impacts:** It is unclear why dewatering is not anticipated nor
17 addressed, particularly for the C Segments, given the localized high perched groundwater
18 table, necessary crossing of a wetland, saturated peat soils, and excavation necessary for
19 installation of water quality / quantity treatment facilities (only the shaft foundations were
20 considered in the analysis). Dewatering will be necessary for construction in this area.
- L-004-049
22 **56. 4.15:** Alternative C-3 directly impacts City of Lynnwood Wastewater Pump Station #10.
23 At the very least there would be impacts during construction, if not permanent. Mitigation /
24 contingencies should be addressed.
- L-004-050
26 **57. 4.16.1 Historic Buildings and Structures:** Refer to comments above dealing with the Grange
27 building, Interurban Railway and Halls Lake.
- L-004-051
29 **58. 5.1 Evaluation of Alternatives, Ability to Meet Purpose and Need, P. 5-2:** states "In the
30 project corridor, the major urban growth centers are at Lynnwood and Northgate, which
31 would be connected by light rail....Moreover, light rail can encourage future private
32 development and investment near stations, which would result in economic benefits that
33 would support the region's economic development plans."
34 The S.2 summary and section 5.1 are clear that included in the purposes and needs is to
35 support redevelopment of Regional Growth Centers of which Lynnwood is the only one
36 served by this project. The July 2013 Transportation Technical Report page 4-100
37 inventories existing nearby parking on generally underdeveloped private parcels located in
38 the City Center. As mentioned earlier, Sound Transit cannot undersize their parking facility
39 and utilize the existing spaces off premises from the transit center for its parking utilization
40 as this runs counter to the ability to meet the purpose and need encouraging
redevelopment and accommodating growth.

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with the Lynnwood Link Extension. As such, discussions of these potential impacts should not be addressed in Section 4.4.2, Long-Term Impacts. However, Section 4.4.5, Cumulative Impacts, has been revised to incorporate additional discussion addressing these potential impacts. Additional discussion of potential cumulative impacts associated with the ST3 extension was also included for each of the elements of the environment discussed in Chapter 4 of the Final EIS. The comment indicates there is inconsistent discussion of potential environmental impacts in Section 4.2.4, Land Use and Section 4.4.4, Social Impacts, Community Facilities, and Neighborhoods regarding the potential for transit-oriented development to occur around the proposed transit stations. The text in Section 4.4.4 was revised to be consistent with language in Section 4.2.4 and reflect that the overall TOD potential in the Lynnwood Transit Center Station area would be strong compared to moderate to strong in the Mountlake Terrace Station area and limited for the station areas in Shoreline and north Seattle.

L-004-042

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

L-004-051
2 59. As the northern terminus and the only Regional Growth Center in this project, Lynnwood
3 will accommodate the highest number of daily boardings in the Lynnwood Link Extension. In
4 order to increase qualifications under New Starts funding criteria and meet Sound Transit's
5 TOD policies, Sound Transit should: Provide increased analysis for C3 tail track impacts
6 related to these purpose and need statements and New Starts funding criteria (below); and
7 Work with the development community to implement its TOD policies consistent with New
8 Starts objectives to accommodate shared use parking with private redevelopment,
9 wherever possible.

L-004-052
11 **60. Table 5-4, Evaluation of Alternatives, Comparison of Segment C Alternatives, P. 5-10:**
12 Based upon previous discussions regarding errors in property takes under the C3 alignment,
13 the information presented in the property and total cost is erroneous and should be
14 revised. Based upon the previous discussion on TOD potential, the information presented is
15 erroneous and should be revised. Based upon previous discussions on ST2 alignments
16 direct and immutable impact to Lynnwood City Center Plans and redevelopment potential,
17 a column illustrating ST3 extension impacts on the block east of 44th Ave needs to be added.

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.

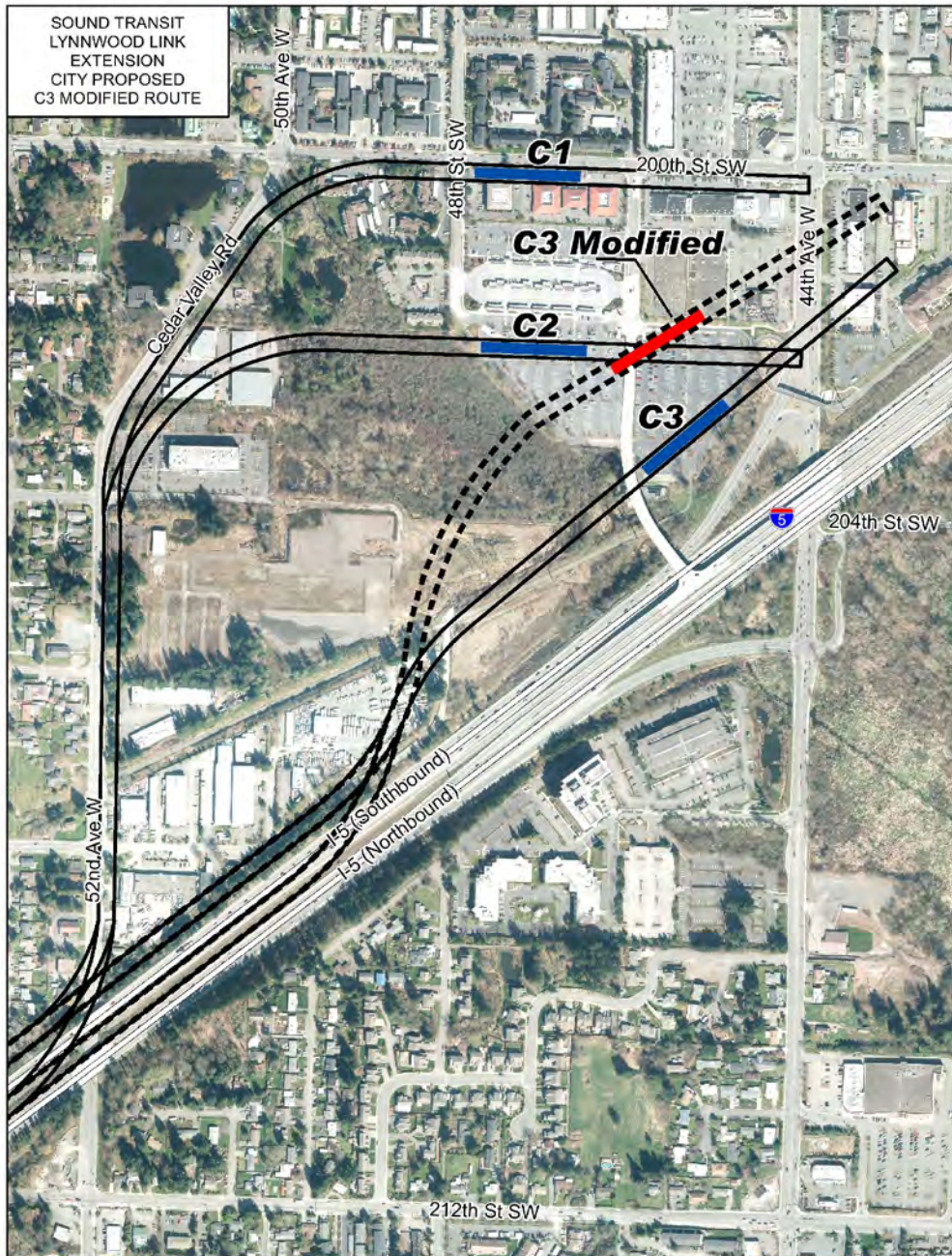
L-004-044

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

of this study.

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.

L-004-051

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.

L-004-052

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.