

EXECUTIVE

September, 19, 2013

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

RE: Lynnwood Link DEIS, Public Comments

Dear Ms. Earl,

L-005-001

First let me again thank you for agreeing to my request that Sound Transit extend the comment period for the Lynnwood Link DEIS.

Lynnwood used the extended time to conduct extensive outreach efforts with our residents and business community. We held three forums for residents and businesses, two in June and a third on Saturday September 14th. Each of our meetings was extremely well attended. People were encouraged during the first two forums to offer their comments directly to Sound Transit and when appropriate through the DEIS website.

Also, at our regular Business Meeting on September 9, 2013, we received "open microphone" comments on ST2 and received three written submissions.

At last weekend's meeting we received a large number of comments which the City summarized on easels, as well as written statements which were submitted. We also received one follow-up email on Monday September 16, 2013, from Linda Willemarck. I am forwarding these to you to insure that they are included in the official record and considered by Sound Transit during the DEIS process.

Therefore, the following items are attached:

1. Citizen comments – Business Meeting September 9, 2013, 3 pages,
2. Sound Transit Community Outreach Meeting: Saturday, September 14, 2013 Notes Taken From Citizen Comments, 10 pages,
3. Email Monday, September 16 2013, 1 page.

L-005-002

In regard to the September 16th email, we concur with Ms. Willemarck's request for a more detailed review of properties in the Conservation Futures Program (CFP), and believe that the detail work will need to be accomplished by Sound Transit to appropriately complete its Environmental Impact Statement process. It would seem appropriate for Sound Transit to follow-

L-005-001

Sound Transit appreciates the City's efforts to engage the community in reviewing the alternatives under consideration.

L-005-002

For the Final EIS, Sound Transit has examined the properties acquired through the Conservation Futures program. If Sound Transit were to proceed with the conversion of part of a property purchased through the program, the agency would meet the replacement requirements as part of its acquisition process.



L-005-002

up with the Snohomish County Conservation Futures Program in regard to property and/or title encumbrances, stipulations, and associated program limitations on the properties. Also, Sound Transit should follow-up with Snohomish County concerning prosecuting attorney legal opinions as to use of CFP properties.

Please convey my appreciation to Board member Paul Roberts, Patrice Hardy, Matt Sheldon, Michelle Ginder and others who helped support our City's outreach efforts.

Sincerely

A handwritten signature in black ink, appearing to read 'Don Gough'. The signature is fluid and cursive, written over a light gray circular stamp.

Don Gough

Mayor, City of Lynnwood

CC: Sound Transit Board
Steve Kennedy, Sound Transit Staff
Lynnwood City Council

Attachments

Sound Transit Community Outreach Meeting: Saturday, September 14, 2013
Notes Taken From Citizen Comments

L-005-003

1 **C1:**

- 2 • Wetlands issue and protection of animals: why can Sound Transit disturb the wetlands if
- 3 the normal citizen cannot.
- 4 • Impacts to quality of life to people, financial impacts to businesses, business relocation,
- 5 park and wetland issues.
- 6 • Disturbing this land could cause geological issues
- 7 • Traffic impacts
- 8 • Home values will decrease and cause decreased tax revenues for the city.
- 9 • Getting a light rail station will be positive: some home values will increase due to
- 10 proximity to the light rail / accessibility of transportation options
- 11 • Noise, vibration, aesthetics: not compatible with the neighborhood
- 12 • The park was purchased with County Conservation Funds. It is federally protected land
- 13 unless development is "unavoidable" but is it really "unavoidable"?
- 14 • Destroys the neighborhood along the route
- 15 • 77 multifamily residents will be displaced and there is no plan to assist them with
- 16 relocation
- 17 • Traffic increased on 200th St – this street is already impacted by traffic
- 18 • Cedar Valley Road is not an industrial area, there are professional businesses located
- 19 there and it is disrupting their business: loss of parking for businesses, construction
- 20 mess
- 21 • It lacks common sense due to the displacement of residents and businesses
- 22 • Not a walkability issue, people won't walk regardless of how far the station is. This option
- 23 displaces people, businesses, parks, and increases noise
- 24 • Retention pond mitigation?
- 25 • Proximity to residents, construction impacts
- 26 • City should be the ones to determine the pros and cons based on City Center plans

27 **C2:**

- 28 • Park, wetlands, wildlife will experience a direct impact
- 29 • Increased crime: drug dealers, gangs
- 30 • Visual, aesthetics
- 31 • Transit increases foot traffic to small businesses
- 32 • Impact / disruption to the Interurban Trail
- 33 • Businesses impacts: displacement, loss of professional jobs (100+ employees)
- 34 • Negative impact on homes, parks, businesses, attracting visitors; loss tax revenue from
- 35 displaced residents, infrastructure of the routes are impactful (pillars)
- 36 • How does the city replace the lost tax revenue from displaced residents and
- 37 businesses?
- 38 • The numbers of impacted businesses in the DEIS only takes into account those that are
- 39 displaced, not those that will be negatively affected by construction, loss of parking, etc.
- 40 • Curves in the route can cause wear and tear on the equipment.

L-005-003

Sound Transit appreciates the summary of comment issues raised regarding Segment C Alternatives during the City's forums; these are similar to the comments Sound Transit formally received during the scoping period. Chapter 7 of the Final EIS summarizes common comments and responses. Responses to comments from individual parties that submitted remarks to Sound Transit on the Draft EIS are provided in the Final EIS Appendix P.

Sound Transit Community Outreach Meeting: Saturday, September 14, 2013
Notes Taken From Citizen Comments

L-005-003

- 1 **C3:**
- 2 • This is positive because it creates a transit node
 - 3 • Impacts park, wildlife, wetlands
 - 4 • This option but move it a little closer to the freeway to create a multi-nodal transit center.
 - 5 Can you direct traffic to 208th instead of 200th?
 - 6 • Would upgrades to the lift station and the retention ponds be charged to Sound Transit?
 - 7 • Flooding issues are a problem
 - 8 • This option is less invasive to residents
 - 9 • This will help us get to Seattle faster, it is less impact to the wetlands and park, and it
 - 10 clumps transit together
 - 11 • Sound Transit needs to research the impacts of this route more
 - 12 • Seems like a funny place for the elevated line (where it crosses I-5 ramp)
 - 13 • This option is too far between transit connections: you need a simple path between bus
 - 14 and train for the access of the riders
- 15 **General Comments:**
- 16 • The route should follow along I-5 and the freeway ramp
 - 17 • Has C4 been researched for the impact on the neighborhood?
 - 18 • How will the line continue to Everett?
 - 19 • Taking the route up I-5 would miss the wetlands and not impact residents
 - 20 • Can the City ask Sound Transit to specify the most stringent environmental impacts in
 - 21 regards to protection of the park, trees, root lines, etc.
 - 22 • C4 is the best option out of the 4
 - 23 • Should have the station at Alderwood with a stop at the Transit Center
 - 24 • These station options aren't close to the types of businesses that you'd walk to, it should
 - 25 be located at Alderwood Mall
 - 26 • Can we get an extension to the 60 day comment period? There are unanswered
 - 27 questions: EPA site visit
 - 28 • Concerned about the errors in the DEIS.
 - 29 • Should use the old Lynnwood High School location as the station or utilize the 'Texas T'
 - 30 on ramp.
 - 31 • How viable is C4? It seems to be the best option
 - 32 • Select a route with the least impact to residents and businesses.
 - 33 • Go to Alderwood Mall, there will be less crime than if it is brought to a neighborhood.
 - 34 • Additional parking at the Transit Center is needed
 - 35 • Embassy Suites has had major issues in regards to the wetlands that were very costly,
 - 36 we need to avoid that.
 - 37 • We should keep Light Rail with the Transit Center
 - 38 • Should have multiple stops in Lynnwood
 - 39 • Bus routes have been cut back the past few years – this won't help reduce car trips
 - 40 • People will still have to drive to the station

2 of 3

Sound Transit Community Outreach Meeting: Saturday, September 14, 2013
Notes Taken From Citizen Comments

L-005-003

- 1 • Relocating to Alderwood Mall would negatively impact those businesses
- 2 • Developing on wetlands is not safe
- 3 • Traffic impacts on 200th St and 196th St
- 4 • All lines turn Lynnwood into an industrialized area
- 5 • Any disruption of the wetlands and Scriber Lake Park are bad
- 6 • All routes would increase crime: drug dealers, gangs
- 7 • Can we tunnel instead of raised or ground level routes?
- 8 • C3/C4 don't devastate the neighborhoods
- 9 • Why doesn't the route stay on I-5
- 10 • All routes impact low income residents and seniors as well as parks
- 11 • New routes should be created that benefit the Lynnwood community – not impact it
- 12 • All routes stand to impact the wetlands
- 13 • Mitigate traffic and amount of parking spaces
- 14 • What impacts will the Lynnwood to Everett line create?
- 15 • All routes don't take into account future growth and planning: City Center, Everett
- 16 extension.

This was meant to be presented as a ^{formal} speech in front of the City of Lynnwood Council.

L-005-003

I would like to thank the city council for allowing me to speak and thank everyone for showing up to support their neighbors, as well as, voice their concerns and opinions on this subject of the Lynnwood Light Rail Alignments.

That autumn evening the air was still and silent as I walked through the park like I always did time and time before. Many of the trees had turned into festive colors of greens, reds, yellows and oranges. A father and his young daughter, she must have been only 5 or 6 years old strolled ahead of me and a mysterious and sudden gust of wind blew through the trees carrying the smells of pine through the crisp air. A sudden shriek forced its way out among the tall evergreens and pines as I stopped and watched with amazement as a large gray owl emerged from the tall green trees and flew towards the child and her father, she pointed and said, "Daddy, did you see that!" with large eyes and in complete astonishment. The father seemed to look like a child himself having larger eyes than his daughter and looked amazed and stunned and said, "Wow!" The owl cruised over my head and disappeared with a screech into the nearby trees behind me. At that moment I felt so incredibly blessed. I have always known that our neighborhood in Lynnwood was special almost sacred. In my almost 40 years of living and growing up in South Lynnwood this was the first time of having the experience of seeing an owl. I have heard them screeching from time to time in nearby tree lines close to our house, but never seen the nocturnal bird. How fortunate we are to live in a city where nature is so close. That is why I find it so hard to believe that the alignments C1 and C2 for the Light Rail are even being considered. These two alignments are intrusive and destructive in what I and others thought was a protected habitat and sanctuary for a vulnerable ecosystem of plants and animals. We in this community as

L-005-003

*to be a voice for those who
can't speak for themselves*

well as the city have a greater responsibility to conserve and protect this habitat and sanctuary that is home for canadian geese, wood ducks, bald eagles, owls, herons, blue jays, beavers, river otters, raccoons, possum, frogs, salamanders, bats, turtles and list is really endless with so many species not to mention all the varieties of trees and vegetation that hide and protect these creatures.

I urge the City of Lynnwood Council to back the citizens that live and work in the path or near the alignments of C1 and C2. I live near both alignments and I fully support the C3 alignment because it has less of an negative impact on our primarily residential neighborhood and does not take out a large part of the park and wetlands.

I would also like to encourage everyone this autumn to tune back into nature and take a walk in the Scriber Creek Park so that you might experience a Wow! moment. This could possibly be your last opportunity to do so before it's all gone.

Thank you city council and everyone who showed up today.

*Tricia Monaghan
5214 201st Pl S.W.
Lynnwood, WA 98036*

Thoughts and Concerns on Sound
Transit Route Alignments for the Community
Outreach Meeting
City of Lynnwood/Lynnwood Link Extension
Saturday, September 14th, 2013
By Mary Monaghan

L-005-003

Yes, we need light rail to Lynnwood. But at what cost to the residents who live here. It is quite obvious to me that C3 is the less intrusive and has fewer impacts to our neighborhood and to the Cedar Valley community.

It has come to my attention that the people in the Cedar Creek Condos and some of the businesses did not know of the light rail coming down 200th St. S.W. Our family has been fighting against the Operations Maintenance Satellite Facility and the light rail for a year. These people just recently found out that they are going to loose their homes and businesses if C1 is chosen as the route and they found this out by letter. We tried to let these people know a year ago and left information at the Condos with the property manager and recently found out from some residents that they never received the information. It would seem that information was allegedly being withheld on purpose and none of these people ever received anything addressed directly to them about Sound Transit until this letter came out eight weeks ago about their property.

I am deeply concerned about all of the impacts this whole project will have to our wetlands and the visual and noise impacts to our neighborhood. Please put yourselves in our place. How would you like this 40ft elevated, massive, intrusive cement jungle, across the street from your home that you have lived in for over 40 yrs, a home that you have put your heart and soul into. It seems dangerous and so out of character for this wetland neighborhood.

Both C1 and C2 would feature design measures to avoid noise impacts, but the elevated guide ways would change views and alternative C3 would have the least effect on this neighborhood because it is largely adjacent or parallel to I-5.

We on 201st Pl. S.W. by Spragues Ponds and mini park will also be impacted visually by the skyline and loss of old growth vegetation and trees in the Scriber Creek Park area along 52nd and 200th St. S.W. There is no way Sound Transit can give all of this back after the construction. These trees are old growth and a buffer to freeway and Park- and- ride noise. The light rail trains cannot have trees within 30ft of the rails. How can you expect us to embrace this massive cold and cruel cement jungle over old growth vegetation and trees and wetlands with cut throat trout, salmon spawning, turtles, dragon flies, butterflies, crickets, birds of all kinds including eagles, osprey, blue herons, wood ducks, Canadian geese, mallard ducks and river otters, raccoons, possum, musk rats, beaver, bats, salamanders, frogs and the serene sound of birds which have a calming effect rather than the stressful sounds of light rail. We had six turtles come down our street a month ago to lay eggs in the rocks in front of our house and across the street at our neighbors. How many people get to see that in their neighborhood? This is a protected wetland area labeled 4f and the sign on Scriber Creek Park sign says "Funded by in part by Conservative Futures Grant. Why would you want to put all of this wildlife in jeopardy and displace all of these animals? Why would you want something so massive going down 52nd and 200th and it will be only a block away from the so called Lynnwood City Center. Do you realize the trains will be running until 1:00 a.m. in the morning and then lined up at night on 200th and 44th waiting to be boarded again in the morning. Is this what you want

L-005-003

people to see when they come into Lynnwood? This is no way to beautify Lynnwood by making it look like the SODO district of Seattle. Keep it over by the freeway and out of our neighborhood and wetlands. Also, you could beautify your "Welcome to Lynnwood" sign a bit by putting seasonal plants and flowers in that space and do some weeding now and then. I'm sure you could even get some volunteers to help and maybe get some donations from nurseries in the area. Other towns have garden clubs that help beautify their city with hanging flower baskets like in Edmonds.

The elevated guide ways on the eastside of 52nd would visually intrude upon the integrity and unity of the residential area. We happen to live in a very special area that many people don't realize exists here in Lynnwood. It is our little paradise of wetlands all in walking distance and I don't think the City of Lynnwood appreciates what they have here. Many people from surrounding businesses such as Group Health and even City of Lynnwood employees come to visit the mini park on Sprague's Pond to have lunch and enjoy the beauty of the park and gaze across the pond over to Scriber Creek Park area. This view would drastically be altered if C1 would be chosen so you are not only altering Scriber Creek Park but also all the adjacent parks are affected. These wetlands could be turned into a wildlife preserve and bird sanctuary and bird watching area that people would come and visit and the walkways would all tie into the bus transit center. Lynnwood should embrace the beauty and resources they have now and not have it torn apart and replaced with ugly cement structures in our skyline.

Please choose C3 for this light rail project of the Lynnwood Link Extension.

TO: Mayor Don Gough from Elaine Smith

and
Council Members

- Loren Simmonds
- Sid Roberts
- Van Auburcho
- M. Christopher Boyer
- Benjamin Goodman
- Kerri Lonergan-Dreke
- and Mark Smith

September 13, 2013

From: Elaine Smith
5630 - 200th St SW # B305
Lynnwood, WA 98036-6262

RE: Lynnwood Link Extension

Dear Mayor and Individual Council Members,

I am so sorry I am unable to attend the Community Outreach Meeting in Council Chambers tomorrow. I did attend the one at the Grange on 6-22-2013.

Please make a strong case to Sound Transit on the DEIS that Option C3 is the only option that makes sense for our community. To try to site the route in our neighborhoods along 52nd Ave W, (Options C1 and C2) would have the effect of destabilizing and brutally "big city industrializing" of our fragile-enough neighborhoods trying so hard to build up our city's sense of neighborhood closeness and cohesion. We don't need trains running through the delicate eco-system of what we all enjoy as Scriber Lake park, either!

Option C makes sense for consolidating and preserving a transit corridor we are already used to for Lynnwood. I believe it would indeed also be the best revenue-producing alternative for businesses, as many ^{new} would jump at the chance to find the safe harbor of hotels, restaurants, and retail options so close to their train journey's end.

Please I count on each of you to lobby hard for what is truly best for Lynnwood. Option C3

Sincerely,
Elaine Smith

L-005-003

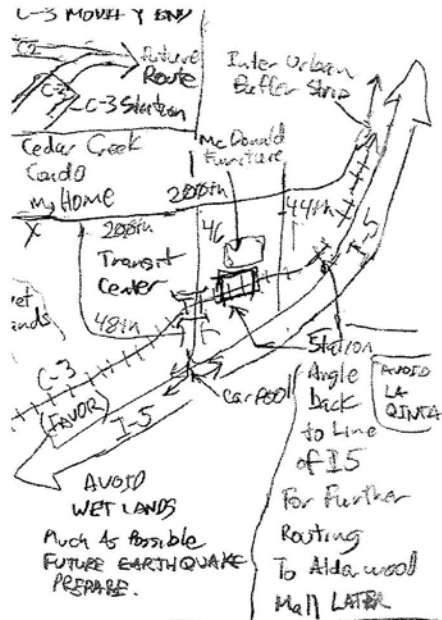
David C. WILLIAMSON
 4805th 200th St. S.W. Apt. E 205
 Lynnwood WA 98036-6362
 425-173-9354

FAVOR: C-3 (modified) → C-4 possible

REASONS:

- 1) Less Amount of Trackage needed to reach between 46th & 44th Street than the other Alternatives (C-1 or C-2)
- 2) Fewer businesses & residences Displaced (than C-1) ^{77 Residences} ^{38 Businesses}
- 3) Earthquake Issues including the BIG Future Cascadia Event → A) 9.0 Richter Mega Thrust, B) "Shake, Rattle & Roll" last 6 to 10 minutes. IMPACT C-2 ^{Adverse Greater}
- 4) Less Noise & Vibration (Residences)
- 5) Less Angle of Curve on C-3 or C-4 means less Wear & Tear on track & equipment as opposed to 90 degrees on C-1 or C-2
- 6) Lower Maintenance Cost on less Trackage, Wear on Curves AVOID Wetland as much as Possible

SEND TO PUGET SOUND TRANSIT



ONE MORE OBJECTION
 C-1 would require WIDENING
 200th to take Out Part
 of OXFORD & CAMBRIDGE
 Apartments across the Street
 from Transit Center (TRAFFIC)
 OXFORD ↑ CAMBRIDGE ↑
 200th
 CEAR CREEK ← 48th TRANSIT
 LYNNWOOD CONDO'S

ADDCS 10/10/2013 11:00 AM E:\PROJECTS\LYNNWOOD LINK EXTENSION\MEETING

From: Linda At Sea [mailto:lindaatsea@yahoo.com]
Sent: Monday, September 16, 2013 12:18 AM
To: Don Gough; pete.vonreichbauer@kingcounty.gov; Sid Roberts; Van AuBuchon; Christopher Boyer; Kerri Loneragan; Benjamin Goodwin; Mark Smith
Cc: nicolaformayor@gmail.com; Laurie Cowan
Subject: Lynnwood Link

Mayor Gough and Lynnwood City Council Members,

L-005-003

I spoke with Diane Bailey, the Administrator of the Conservation Futures Fund, and she told me that the Fund's records show the City of Lynnwood received funding for both Scriber Creek Watershed #1 and the Scriber Creek Wetlands Complex. She recommended that the City of Lynnwood check into how those monies were spent; specifically if there were Inter-local Agreements and Declarations of Protective Covenant for the properties funded with Conservation Futures, and to check on possible matching funds for these monies and any stipulations. (In addition, due to the naming conventions used in the City's, the Deis's and the Conservation Futures Fund's maps, I believe these funds may have been used to purchase other parcels of land impacted in the Lynnwood Link C Alternatives.)

Ms. Bailey also said to check the Title Report for the properties regarding any encumbrances which could have a significant impact on the use of these lands. Nancy Bartley, reporter, "The Seattle Times," interviewed David Somers, Council Member, Snohomish County Conservation Futures Program Advisory Board. It is my understanding he is getting an opinion from a Snohomish County attorney regarding the legal use of these properties. Also, a Field Visit to the potentially impacted lands is being scheduled by the EPA, with the FTA and Sound Transit.

I hope the Council ensures that all necessary information is obtained before making a final recommendation on the Lynnwood Link Alternatives on September 23, as there are many unanswered questions.

The future of a sensitive ecosystem, a large condominium community, many businesses, and the fate of a neighborhood rests with you. I believe Sound Transit will follow your lead and develop the route you recommend as it is easier to follow the path of least resistance. I also respectfully request that a motion be made by a council member for a Roll Call Vote so that citizens/voters know who agreed or disagreed with the City's recommended route to Sound Transit.

Thank you for your consideration.

Respectfully,

Linda Willemarck

From: Maureen Wojewodzki <mwojewodzki@ci.lynnwood.wa.us>
Sent: Thursday, September 19, 2013 4:07 PM
To: Lynnwood Link DEIS
Cc: Don Gough; Art Ceniza; Paul Krauss; David Kleitsch; William Franz
Subject: Transmittal of DEIS comments by Lynnwood residents (part 2)
Attachments: CitizenCommentsCouncilMtg.pdf

Dear Ms. Swift:

L-006-001 | Please accept the attached transmittal of DEIS comments by Lynnwood residents during the City Council Meeting held September 9, 2013. These comments are referenced in the Mayor's letter dated September 19th that was previously submitted. If you have any questions, please contact me at (425) 670-5001.

Best regards,
Maureen Wojewodzki
Executive Assistant to the Mayor
City of Lynnwood

L-006-001

Thank you for submitting the comments received by the City; these comments overlapped with comments Sound Transit received directly, but where they were unique, Sound Transit created a separate entry and responded directly in Appendix P of the Final EIS.

CITIZEN COMMENTS

BUSINESS MEETING

September 9, 2013

TO: Parks and Recreation Board and
TO: City Council

Below are excerpts from the 2020 Comprehensive Plan for Lynnwood that I found online. Note that the C1 and C2 routes for the Light Rail conflict with the spirit and intent of your Plan. Please choose C3 or find an alternative that does not intrude on parks, wetlands and neighborhoods.

Respectfully,



Maryellen Walsh

2020 COMPREHENSIVE PLAN - TRANSPORTATION, PAGE 1

The City's goal for the transportation system is:

To provide mobility options for residents, visitors and commuters through a balanced transportation system that supports the City's land use vision, protects neighborhoods from transportation impacts and minimizes adverse impacts on the environment.

2020 COMPREHENSIVE PLAN - TRANSPORTATION, PAGE 29

Subgoal: Environmental Factors

Minimize the impacts of the transportation system on the City's environment and neighborhood quality of life.

2020 COMPREHENSIVE PLAN - LAND USE, PAGE 21

Park/Recreation/Open Space (PRO)

Purpose: This plan category is intended to provide land area for the active and passive park and recreational needs of the city; and, to set aside areas for natural conservation.

Principal Uses: Public parks, designated open space and public recreational or educational facilities. Structures at properties in this category shall be limited to facilities needed to support the designated or planned park or open space use of the properties.

Locational Criteria: Location of these facilities will be influenced by multiple factors, including but not limited to: proximity to the population served, land availability, and amenity value of the site.

Building Design: Buildings shall be low-rise structures. Buildings in or next to residential areas shall be designed to complement residential design characteristics.

My name is Linda Willemarck. I live at 4900 200th St SW in Lynnwood. Since learning about the Sound Transit's Alternatives for the Lynnwood Link, a mere 3 months ago, I have spent a great deal of time trying to understand what properties are involved and what impacts it will have.

As you know, both the C1 and C2 Alternatives would be going down 52nd Ave West/Cedar Valley Road. In my research I found a very compelling document that really puts into perspective the importance of this area. The document reads, quote "...an established single family neighborhood containing hundreds of affordable homes and is in close proximity to several affordable housing apartments and condominium complexes, all of which would be adversely impacted by light, noise, property values, and other impacts ..."

"directly impacts hundreds of affordable homes when there are other sites available, raises social justice issues..."

"...located adjacent to significant city recreational resources of Scriber Creek and associated wetlands, and the city's Scriber Creek Park, that provide places to experience nature in close proximity to Lynnwood's City Center and regional Interurban Trail, both of which would be negatively impacted..."

"...Therefore, the City Council of the City of Lynnwood does hereby resolve and request the Sound Transit Board to remove from its potential sites and evaluations list the Lynnwood 52nd Avenue West/Cedar Valley Road site..." "

....that such site not be included in any environmental analysis, due to its many significant and unresolvable and irreparable impacts upon the City of Lynnwood, its residents and businesses and upon the Edmonds School District."

These quotes were taken from Resolution No. 2012-07 of the City of Lynnwood, Washington, regarding issues concerning the potential siting by Sound Transit. It was signed by Mayor Gough of Lynnwood on 10/22/2012.



My name is Linda Willemarck. My address is 4900 200th St SW in Lynnwood.

If you're familiar with the Lynnwood Link C Alternatives, then you've heard of Scriber Creek Watershed #1, now known as Scriber Creek Park, as well as the Scriber Creek Wetlands Complex – paid for, at least in part, by the Conservation Futures Fund. A fund from property taxes specifically for the purpose of preserving open space, farmland or wooded acreage.

“...to protect, preserve, maintain, improve, restore, limit the future use of, or otherwise conserve, selected open space land, farm and agricultural land, and timber land... for public use or enjoyment.”

Tom Tiegen, Snohomish County Parks and Recreation Director said, “The acquisitions are a chance for the county to make priceless additions that will benefit “our grandchildren's grandchildren.”

Conservation Futures Funding got its start in the state in 1971 under the leadership of Gov. Dan Evans. The state Legislature declared citizens had a “fundamental and inalienable right” to a healthy environment.

From “The Healing Power of Nature”, Denise Mitten, PhD writes “research has shown that time in natural spaces strengthen neighborhood ties, reduces crime, stimulates social interactions among children, strengthens family connections and decreases domestic violence, assists new immigrants cope with transition, and is cost effective for health benefits.

The Park really speaks for itself.

A handwritten signature in cursive script that reads "Linda Willemarck".



SHORELINE
CITY COUNCIL

Keith A. McGlashan
Mayor

Chris Eggen
Deputy Mayor

Will Hall

Doris McConnell

Chris Roberts

Jesse Salomon

Shari Winstead

September 16, 2013

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

Re: Draft Environmental Impact Statement for the Lynnwood Link Extension

Dear Ms. Swift:

The City of Shoreline would like to take this opportunity to provide Sound Transit with our comments in response to the Draft Environmental Impact Statement for the Lynnwood Link Extension. The City appreciates the opportunities to participate in Sound Transit's planning process to date and the regular updates provided by Sound Transit staff throughout this process.

L-007-001

The City of Shoreline is excited about the extension of light rail to Shoreline in the near future. It is our City's belief that effective, fast and reliable transit service benefits our residents and the region as a whole in a variety of ways. Expanded mobility options, reduced congestion and minimizing our contribution to climate change are just a few of the benefits of a robust transit system that also mirror the goals of our Council and Shoreline's adopted plans and policies. Shoreline citizens overwhelmingly supported Sound Move and S12.

L-007-002

The City's primary interest with the Lynnwood Link Extension is the inclusion of two light rail stations in Shoreline. In April 2012, the Shoreline City Council identified NE 145th Street and NE 185th Street as the two preferred station locations in Shoreline and sent a letter to the Sound Transit Capital Committee stating this preference. A copy of this letter is enclosed. After reviewing the DEIS and consideration of the impacts of the Lynnwood Link Extension, the City of Shoreline remains committed to this preference. We believe that with appropriate mitigation, NE 145th Street and NE 185th Street locations represent the best alternatives for Shoreline and the region and will result in the most successful project outcome for both Sound Transit and the City of Shoreline.

L-007-003

The alternatives considered in the DEIS identify two station pairings in Shoreline: NE 145th Street and NE 185th Street and NE 155th Street and NE

17500 Midvale Avenue North • Shoreline, Washington 98133-4905
Telephone: (206) 801-2700 • www.shorelinewa.gov

L-007-001

Thank you for your comments and efforts in working on the initial development of the Lynnwood Link Extension.

L-007-002

Thank you for your comment stating support for the Lynnwood Link Extension.

L-007-003

Thank you for your comment stating your station preferences and reasons for wanting stations at NE 145th and NE 185th Streets and reasons for not wanting a station at NE 155th Street. Sound Transit also appreciates the City of Shoreline's willingness to plan around the proposed stations with an emphasis on multimodal access.

185th Street. Shoreline believes that a station at NE 145th Street is preferable to a station at NE 155th Street for several reasons. First, a station at NE 145th Street 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 the primary station for residents of Lake Forest Park, Kenmore, Bothell and potentially points east. Several of these jurisdictions, as well as other agencies throughout the region, have provided Sound Transit with letters of support for the NE 145th Street station. Additionally, we believe close proximity to a main thoroughfare is the most appropriate location for a regional station and NE 145th Street provides this access. Most importantly, the voter approved ST2 package included stations at NE 145th Street and NE 185th Street.

In anticipation of identification of the Preferred Alternative by the Sound Transit Board, the City of Shoreline has already begun station area planning which includes increasing density around stations to facilitate transit oriented development. A significant component of that work is the evaluation of multi-modal access to the stations, with the intent of identifying new pedestrian, bicycle and transit improvements near the stations. Additionally, the City of Shoreline is leading a multi-jurisdictional planning effort for the 145th Street corridor that will evaluate and ultimately identify the necessary improvements to the roadway for vehicles, buses and nonmotorized users. These improvements will not only help to improve multimodal access to the station, they will help facilitate transit oriented development through additional and upgraded pedestrian facilities and an improved roadway for transit connections that will allow residents to access neighborhoods beyond the light rail station. Shoreline is evaluating the potential annexation of NE 145th Street from the City of Seattle and King County and has begun discussions with these jurisdictions, subject to the designation of a light rail station at NE 145th Street in the Preferred Alternative.

We believe that a station at NE 155th Street will result in significant negative impacts to the surrounding stable, single family neighborhood. The area around the proposed station, as well as properties along the 155th Street corridor, is almost entirely single family residential. The 145th Street corridor includes a mix of multi-family residential, commercial and single family uses. Because 155th Street carries anywhere from one-quarter to one-half of the daily traffic of 145th Street, the traffic impacts associated with a station at NE 155th Street will be much more significant compared to those associated with a station at NE 145th Street. The Shoreline Fire District has a fire station on NE 155th Street located between the proposed light rail station and parking structure. They have written to Sound Transit expressing their concerns that a light rail station at NE 155th Street may negatively impact emergency response times due to the increased vehicle and bus traffic associated with the station.

The City's specific station design preferences include:

L-007-004

- NE 145th Street: Develop a station with an associated 500 space parking facility located just north of the overpass, primarily in the vegetated area between the bridge and a relocated northbound on-ramp, as shown in Alternative A3, Option 2.

L-007-005

- NE 185th Street: Develop an at-grade station on the east side of I-5 with an associated 500 space parking structure located on the west side of I-5, primarily within the I-5 right-of-way and mostly below the grade of NE 185th Street and 5th Avenue NE, as shown in Alternative A1, Option 1.

L-007-006

The City of Shoreline recommends Sound Transit construct a track alignment that is at-grade as much as possible in order to minimize cost, visual and noise impacts. All elevated sections of the alignment need to be designed in a manner that does not impede any future modifications to the interchanges at NE 145th Street, NE 175th Street and NE 205th Street.

Four of the alternatives included in the DEIS include three stations in King County while the ST2 package only anticipated two, both of which are in Shoreline. The Preferred Alternative selected by the Sound Transit Board needs to include two light rail stations in Shoreline at NE 145th Street and NE 185th Street, consistent with the voter approved ST2 plan. Should funding be available, a third station in King County is acceptable; however, the quality of the stations and passenger facilities as well as the necessary mitigation for the impacts of the stations in Shoreline should not be compromised in order to fund the third station.

L-007-007

We understand that light rail passengers will travel to the station by a variety of modes – bus, bicycle, on foot and via automobile and it will be essential to accommodate them all. It is also very important that Sound Transit integrate passenger safety, comfort and convenience into the design of all facilities and transportation improvements serving the stations.

L-007-008

Please find enclosed a list of additional comments, issues and mitigation measures from the City of Shoreline in response to the Draft Environmental Impact Statement. The City would like Sound Transit to incorporate these into the Final Environmental Impact Statement. There are several items, specifically in regard to transportation impacts, where additional information is needed in order to accurately predict potential impacts and identify the appropriate mitigation. We anticipate that staff from both of our agencies will work to reach a resolution to these outstanding issues as part of the FEIS development and will continue to do so for other issues that arise as part of the FEIS development, system and station design and through operation of service. We trust that Sound Transit will fund the mitigation that we jointly agree are

L-007-004

Thank you for your comment stating a preference for Alternative A3, Option 2 for the proposed station at NE 145th Street.

L-007-005

Thank you for your comment stating a preference for Alternative A1, Option 1 for the proposed station at NE 185th Street.

L-007-006

The City's preferences for a Segment A alternative are noted and the letter as well as a summary of the comments were given to the Sound Transit Board after the close of the comment period. The Final EIS includes supporting documentation on proposed modifications in interchange areas. The Transportation Technical Report has further details on the transportation issues in the interchange areas.

L-007-007

Sound Transit is developing the project and its stations to be easily accessible by a variety of modes, and the agency has developed design requirements emphasizing factors including safety, convenience, and comfort for patrons; as the project moves beyond preliminary engineering and into final design, Sound Transit will continue to coordinate with the City in developing station designs.

L-007-008

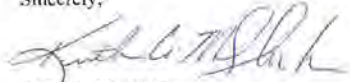
Sound Transit appreciates the City's review of the EIS and for its collaboration in planning the Lynnwood Link Extension. Responses to the City of Shoreline's detailed comments follow.

L-007-008

necessary to protect the community, preserve safety and provide this much needed light rail system.

Thank you for your consideration of our comments. We look forward to continuing to work with Sound Transit on this important project. If you have any questions or need additional information, feel free to contact Alicia McIntire, Senior Transportation Planner, at 206.801.2483.

Sincerely,



Keith A. McGlashan
Mayor

Enc. City of Shoreline Comments, Lynnwood Link Extension Draft
Environmental Impact Statement
April 2012 Screening Alternatives Comment Letter

**CITY OF SHORELINE COMMENTS
LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Transportation

General

- L-007-009** • For each station, there will be impacts to nearby intersections and roadways that need to be mitigated. It will be Sound Transit's responsibility to fully mitigate for all transportation impacts resulting from the proposed stations. The City of Shoreline does not agree that Sound Transit will only be responsible for paying a portion of improvements at some locations. Sound Transit is responsible for all costs associated with mitigation for transportation impacts that result in failures to meet Shoreline's adopted concurrency standards. The specific improvements will be designed in coordination with the City's Transportation Planning Manager and Traffic Engineer to ensure they meet the City's design and operational standards. The City of Shoreline is currently considering the adoption of transportation impact fees and an updated concurrency methodology. Sound Transit would be subject to these regulations should they be adopted.
- L-007-010** • All roadway improvements must be consistent with the City of Shoreline's adopted roadway standards including lane width, amenity zones, sidewalk width, bicycle facilities, stormwater management (including Low Impact Development) and parking. Improvements should be designed to minimize conflicts between nonmotorized modes (bicyclists and pedestrians) and vehicles. Roadway improvements should be extended to the nearest intersecting arterial.
- L-007-011** • During the City's review of the traffic model developed for this project, several errors were noted. Sound Transit needs to work with City of Shoreline staff to identify and correct these errors. Additionally, it appears that the No Build scenarios developed in the model assumed significant growth and development around the stations in Shoreline. However, if light rail stations were not going to be developed in Shoreline, the growth assumptions around these stations would be significantly different, with much less growth planned in these areas. It is critical that the traffic model be accurately calibrated and coded correctly as this will influence the base level of service and model outputs. In addition to the specific transportation mitigation identified below, the corrections to the model may identify additional issues that require mitigation. Mitigation for any newly identified impacts will be discussed and agreed upon between Sound Transit and the City of Shoreline.
 - The traffic analysis needs to incorporate the anticipated growth at the Point Wells site in southwest Snohomish County. This development is expected to generate approximately 11,600 daily vehicle trips by 2035 and all of these trips will travel through Shoreline, as the sole access point to the site is in Shoreline. Residents of this development that will use light rail are likely to travel to the station at NE 185th Street. If this growth was not incorporated into Sound Transit's traffic analysis, Sound Transit will need to do so. The results of this revised analysis shall be reviewed with the City of Shoreline. Mitigation for any newly identified impacts will be discussed and agreed upon between Sound Transit and the City of Shoreline.

L-007-009

While some details of the mitigation agreements with the City will depend on final design details, the Final EIS continues to state the impact that Sound Transit's project would create compared to No Action, and it defines Sound Transit's mitigation commitment to achieve future year conditions or better than with the No Build Alternative. While Sound Transit is committed to working with the City to develop solutions that could improve conditions that would be better than under the No Build Alternative, Sound Transit does not accept sole responsibility for making transportation system improvements at locations that would be below standards even with the No Build Alternative alone. The Final EIS (Section 3.6) includes further details for the Preferred Alternative on how impacts related to stations will be mitigated, and it also has updated the analysis at a number of locations in response to other comments from the City. This section also explains how Sound Transit will coordinate with the City as the project advances, and how Sound Transit could partner with the City to incorporate the Lynnwood Link Extension's proposed improvements and mitigations within projects that the City itself might pursue to address future transportation demands related to its own anticipated growth.

L-007-010

Section 2.6 of the Draft EIS described Sound Transit's Environmental Practices and Commitments, which are directly related to how Sound Transit's design standards, applicable local agency design standards, and permitting processes will be used as the project progresses through final design and into construction. The section notes, "Sound Transit will work collaboratively with other jurisdictions to comply with all required permits and approvals needed for construction and operation."

L-007-011

Sound Transit appreciates the comments on growth levels from the City, noting that the original Draft EIS assumptions for station area

L-007-012

- No mitigation is proposed in the DEIS for NE 175th Street and Meridian Avenue N, either for the temporary impacts associated with construction or for permanent impacts. During construction at NE 185th Street, particularly if the bridge is closed for 9-12 months, the City of Shoreline anticipates that there will be significant traffic diversion to NE 175th Street. These temporary impacts will require mitigation. Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation for construction. The City of Shoreline believes that permanent traffic impacts to this intersection and corridor can be attributed to the presence of the light rail stations and that Sound Transit is responsible for mitigating these impacts. This intersection may require turn pockets (WB to NB right turn). Other mitigation may be required at the intersection or along the corridor. Sound Transit needs to perform additional analysis of this intersection and corridor and work with the City of Shoreline to identify the appropriate mitigation for impacts to them.
- Cut-through traffic on non-arterial streets in the vicinity of the stations is likely. Measures that are designed to prevent or minimize this cut-through traffic will be required. The City of Shoreline has an adopted Neighborhood Traffic Safety Program which was created to respond to residents' concerns about speeding, cut-through traffic, accidents and pedestrian safety on non-arterial streets. Additionally, the City has developed Neighborhood Traffic Action Plans to improve the safety, mobility and livability of the City's neighborhoods. Sound Transit should contribute funding to the City's existing programs or set aside funding to work with the City of Shoreline once the stations are complete and service is in operation to identify and fund solutions for five years that reduce/mitigate cut-through traffic.
- Any impacts to the roadway network that modify streets need to maintain the existing street grid and not result in new dead end streets.

L-007-013

- Improved bus service that feeds each station will be imperative. Although the specific number of routes and frequency of service is not known at this time, the stations need to be designed to handle the maximum bus service that is forecast to serve them. Because light rail will significantly change bus service in Shoreline, a comprehensive evaluation of all transit service in the City is needed to ensure that the stations have adequate bus facilities, other facilities in the City are adequately served and that feeder service to the stations is serving all neighborhoods in Shoreline. As part of Shoreline's station area planning process this and next year, the City will prepare a Transit Integration Plan that identifies policies addressing future transit needs throughout Shoreline once light rail service begins. This process will identify levels of service and areas the City wants to see served when future service changes are implemented. This will be a coordinated process with Metro, Community Transit and Sound Transit that looks at their current policies for service distribution and redistribution of service hours in conjunction with commencement of light rail service. The expected outcome will be an agreement with Metro, Community Transit and Sound Transit on policies that will direct future transit service integration.

L-007-014

- Safety for all transportation modes is a critical aspect of facility design and development of appropriate mitigation. With the operation of light rail service, the volumes of pedestrian, bicycle, bus and vehicular traffic will increase significantly around the stations and along the roadways serving them. Many of these roadways currently serve several, if not all, of these

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developments were developed in coordination with the City. For the Final EIS analysis Sound Transit met with the City to update the assumptions on growth levels. Sound Transit also updated the traffic volumes to include traffic from the proposed Point Wells development. In addition to making these localized adjustments, the forecasts were updated relative to more recent population and employment growth assumptions produced by PSRC and to reflect growth in other areas. Updated analysis of the NE 185th Street Station area and other locations, including the impacts and related mitigation, are documented in the Final EIS and the Transportation Technical Report.

L-007-012

175th at Meridian: An analysis of construction-related impacts was conducted as part of the Draft EIS and, as noted in the comments, specific mitigation was not proposed at this intersection. The Final EIS contains a refined analysis of construction-related impacts and assesses potential impacts at this intersection. The analysis of traffic impacts during the permanent configuration was also revisited for the area around the NE 185th Street Station, including the intersection of NE 175th Street/Meridian Avenue. This location was not identified for mitigation as part of the project, however.

Cut through traffic: In Chapter 3, Transportation, Section 3.6 of the Draft EIS, Sound Transit acknowledges the need to mitigate cut-through traffic and states that the mitigation would be determined in conjunction with local jurisdictions. The Final EIS Chapter 3, Section 3.6, identifies mitigation measures Sound Transit has identified to minimize the potential for cut-through traffic impacts, including neighborhood traffic control strategies that can be implemented in collaboration with the City.

L-007-013

Sound Transit agrees that effective transit connections to the stations is

- L-007-014** | modes. As a result of the increased volumes, the conflicts between the various modes will increase significantly. For example, buses and bicycles will experience conflicts on shared roadways if buses are able to stop in a bicycle lane. Similarly, if kiss-and-ride spaces are located adjacent to bicycle lanes, there will be conflicts between bicycles and drivers as they enter and exit this area. Sound Transit needs to work with the City of Shoreline to examine the potential for conflicts between travel modes and identify the appropriate solutions to minimize conflicts and maximize safety.
- L-007-015** | • The DEIS states that potential transit priority treatments along N/NE 185th Street could be considered in the Final EIS. Sound Transit should install transit priority treatments along N/NE 185th Street as well as N/NE 145th Street, N/NE 155th Street and other primary transit corridors serving the light rail stations that are identified as part of the City's Transit Integration Plan.
- L-007-016** | • All of the alternatives will require demolition and reconstruction of the NE 195th Street pedestrian and bicycle bridge. Design and reconstruction of the bridge shall be coordinated with the City of Shoreline and should include: a minimum width of sixteen feet (eighteen feet is preferred to provide access for emergency or maintenance vehicles); improvements to the approaches that remove the bollards and improve accessibility; provide connections to 5th Avenue NE on the west side and a connection to the school through the park (within the Interstate 5 right-of-way); improved lighting, protection for users and graffiti proof materials. The bridge may be a location where Sound Transit is able to install art.
- In areas where there is connected surplus right-of-way that cannot be utilized for redevelopment purposes, separated pedestrian and bicycle facilities (such as a path adjacent to Interstate 5) should be constructed to facilitate nonmotorized travel to the stations.
- L-007-017** | • A separate Transportation Impact Analysis will be required for each station in Shoreline at the time of building permit submittal.
- L-007-018** | • The DEIS states that column locations associated with elevated alignments may constrain sight distances and that mitigation may be required for these impacts, however, no specific mitigation is proposed. The location of any columns must comply with the City's adopted standards for site distance. Column placement will be evaluated by the City during design. Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation for sight distance impacts.
- L-007-019** | • The City of Shoreline requires eight foot wide sidewalks adjacent to all uses other than single family residential and in areas where high pedestrian volumes are anticipated. This will be the case for all light rail stations and many of the pedestrian improvements that will serve the stations. Sidewalks must be separated from the travel lane by an amenity zone that is at least five feet wide.
- L-007-020** | • The construction of any improvements along the west side of Interstate 5, including parking structures and rebuilt bridges, shall not impede the potential for future construction of a southbound Interstate 5 collector-distributor lane from NE 205th Street to NE 145th Street.

very important, and appreciates the City of Shoreline's interest in developing its own Transit Integration Plan to also consider citywide routes and services. Chapter 3 of the EIS describes the transit integration planning process that Sound Transit anticipates for the project as part of the later operational planning steps, working with King County, Community Transit, and the local jurisdictions. The City's policy statements would certainly help support that process, but the transit agencies already have established service planning steps that they must follow in making service adjustments, and levels of service also depend on available revenues for local service. Sound Transit's own service adjustment changes also have a defined process, and are made under the authority of the Sound Transit Board. Sound Transit looks forward to working collaboratively with the City and the other transit agencies during the transit integration process for the project overall, but a separate agreement with the City to direct future service planning is not consistent with the process defined for the project and used for previous projects implemented by the agency.

L-007-014

Sound Transit agrees that safe and convenient access to the stations is important. Sound Transit will work with the City during final design to develop the detailed design for the project.

L-007-015

The Draft EIS did not identify transit priority as a mitigation measure separate from other measures that could be considered to address congestion the project could cause in station areas. Transit priority continues to be noted as a supporting improvement that could be made in partnership with the City of Shoreline, King County Metro, and Community Transit, but it is not specifically part of the proposed project.

NE 145th Street Station

- L-007-021**
- The City of Shoreline is currently considering annexation of 145th Street and has begun conversations with Seattle and King County regarding this possibility. Should the annexation occur and the roadway be controlled entirely by the City of Shoreline, improvements on 145th Street would be subject to Shoreline adopted roadway and intersection standards and roadway mitigation will be subject to Shoreline's adopted standards.
- L-007-022**
- The DEIS mentions the current sidewalks on NE 145th Street, however, it fails to adequately describe their very poor condition. Sidewalks on NE 145th Street that would serve the station are substandard, do not meet ADA requirements and often contain barriers to travel, such as utility poles and mailboxes. The pedestrian environment crossing the Interstate 5 overpass is also uncomfortable, with narrow sidewalks and no buffer between pedestrians and vehicles. Other nearby streets connecting to the station are also in need of new or improved sidewalks. In order to facilitate pedestrian access to this station, Sound Transit should construct the following pedestrian improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Reconstruct sidewalks on both sides of NE 145th Street from 1st Avenue NE to 8th Avenue NE to Shoreline city standards. This is a reasonable walking zone to connect nearby residents and Lakeside school attendees along a busy and severely substandard arterial street walkway to the station at NE 145th Street.
 - Improve the pedestrian environment at the Interstate 5 interchange through wider sidewalks that are separated from the travel lanes and safer crossings. This includes the pedestrian crossing at the southbound on-ramp to Interstate 5, as the City of Shoreline does not agree with the assumption that additional traffic will not affect pedestrian safety at Lakeside High School and Middle School as stated in the DEIS.
 - Construct sidewalks on 1st Avenue NE from NE 145th Street to NE 155th Street. This is a reasonable walking distance to connect nearby residents coming from west of Interstate 5.
 - Expand the width of existing sidewalks on NE 145th Street and 5th Avenue NE to eight feet along the frontage of the station as well as at nearby bus stops and from those bus stops to the nearest intersection.
 - Additional sidewalks on non-arterial streets near the station may also be required to facilitate pedestrian movement and safety.
 - Any walkways from the parking structure to the station must be safe, comfortable and provide weather protection for pedestrians.
- L-007-023**
- Bus service to the station will be critical to provide an option for those who cannot or do not wish to drive in order to access light rail. The following transit improvements are needed at this station:
 - Depending upon how buses are routed to serve the station, there need to be safe facilities for riders boarding and disembarking buses and crossing streets, where necessary. This will be of particular importance if all bus stops are located on-street rather than within the station area.

L-007-016

While design details would be further developed during final design, Sound Transit will coordinate with the City and with Washington State Department of Transportation (WSDOT) for the design and reconstruction of the bridge, and will conform with the applicable standards, permits, and approvals required by the City and WSDOT. The anticipated minimum bridge width would be 14 feet, consistent with WSDOT Design Manual 1510.14(1), but a wider width could be considered. Facilities would be ADA compatible, replace existing connections, and would meet other safety and security requirements and facility design standards. Other beneficial uses would also be considered, such as providing additional replacement vegetation for areas that must be cleared for the project.

L-007-017

Sound Transit will continue to work with the City to meet permitting requirements during the project's final design and permitting stages, but believes that the EIS analysis provides a reasonable basis for determining transportation impact levels for the stations individually as well as the project overall. On other Sound Transit projects, some jurisdictions have adopted the SEPA EIS and included supplemental information for intersection operations with final design details, or added nearer term or year-of-opening traffic projections.

L-007-018

Sound Transit will minimize site distance constraints to extent possible consistent with Design Criteria manual. However, left turns from side streets or driveways under the elevated guideway would likely be restricted and rerouted to the nearest signalized intersection for left turns or U-turns. The Final EIS clarifies the previous statement on sight distances.

L-007-023

- The City supports development of a transit patron loading and unloading area that is off-street in order to minimize street crossings and maximize safety for riders, similar to what is proposed at NE 185th Street. This area needs to be adequate to provide ample space for the various routes serving it, including space for additional bus service as demand grows.
- For safety purposes, if bus stops remain on-street the eastbound bus stop at NE 145th Street and 5th Avenue NE/Interstate 5 should be far side, not near side.

L-007-024

- It is unlikely that significant bicycle improvements will be installed on 145th Street in conjunction with the station development. However, bicyclists are likely to access the station via alternate routes. N/NE 155th Street will serve as the primary east-west route for bicyclists traveling to and from the station as it currently has bicycle lanes from Midvale Avenue N to 5th Avenue NE (bicycle lanes will be extended east to 15th Avenue NE by the City in 2014). Bicyclists are likely to access N/NE 155th Street and the NE 145th Street station and the station via 5th Avenue NE, 10th Avenue NE and Meridian Avenue N. In order to facilitate bicycle access to this station, Sound Transit should construct the following bicycle improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Install bicycle lanes on 5th Avenue NE from NE 145th Street to NE 185th Street. These lanes will also serve the NE 185th Street station.
 - Install bicycle lanes on Meridian Avenue N from N 145th Street to N 200th Street. These lanes will also serve the NE 185th Street station.
 - Install sharrows on 10th Avenue NE from NE 155th Street to NE 175th Street.
 - Install wayfinding signage directing bicyclists to the station along new and existing bicycle facilities. This signage shall be consistent with the City of Shoreline's wayfinding program.
 - Install facilities along new and existing bicycle routes serving the station to minimize the conflicts between bicyclists and buses, including improvements that prevent buses from blocking bicycle lanes at stops.
- Install a separated nonmotorized trail adjacent to Interstate 5 in the Interstate 5 right-of-way from NE 145th Street to NE 155th Street.

L-007-025

- The northbound Interstate 5 on-ramp is currently identified as a High Accident Location and should be signalized for vehicles and pedestrians as suggested in the DEIS.

L-007-026

- The intersection/interchange and NE 145th Street, Interstate 5 and 5th Avenue NE is extremely complicated. The City of Shoreline has concerns about the traffic model results and potential mitigation for this area identified in the DEIS. For example:
 - Potential mitigation at NE 145th Street and 5th Avenue NE includes adding a protected right turn phase from northbound to eastbound traffic. The City of Shoreline disagrees that this mitigation will address the identified problem.
 - The City of Shoreline has concerns about the safety and operation of the garage entrance/exit onto 5th Avenue NE (Option 2).Due to the close proximity of the existing intersections, the operation of each individual intersection can impact others. The existing signals at the interchange, in addition to those proposed, need to be evaluated as part of the entire corridor/coordinated system. This

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L-007-019

Comment acknowledged. As noted previously, Sound Transit will work with the City during final design and permitting to address these detailed design questions.

L-007-020

The conceptual design for the project considers the potential for planned improvements along I-5, as outlined in the Compatibility Report described in Chapter 2, which was developed by Sound Transit and WSDOT, and which anticipates an additional two lanes to be added to I-5 in this area in the future.

L-007-021

As noted previously, Sound Transit is committed to consulting with local jurisdictions to successfully meet the conditions required to permit the project. The Final EIS provides additional detail for mitigation measures, including design refinements, for the project to resolve environmental impacts.

L-007-022

Sound Transit recognizes the City's interests in the conditions of its sidewalk system and in addressing safety concerns in its current system. As is appropriate for an EIS that is meant to identify significant environmental impacts for a proposed action, the EIS would not include a detailed inventory of sidewalk conditions around station areas, although the Transportation Technical Report does identify gaps. A number of the areas that are noted in the City's comments are included in the refined design developed for the Preferred Alternative. However, where the project does not alter existing facilities that may have current deficiencies, particularly in areas outside the immediate station area, the EIS continues to find that the potential for increased traffic alone does not create a safety impact. Continued growth in traffic would occur with

L-007-026

evaluation should incorporate the location of the parking garage access, off-street transit facility ingress and egress points and the northbound on-ramp. Alternate locations for the parking garage ingress/egress should be examined, including a northern location that is accessed from a roadway adjacent to the on-ramp. . All improvements at this intersection/interchange need to be evaluated simultaneously for all modes to determine the appropriate mitigation at this location. Sound Transit will need to work with the City of Shoreline to identify appropriate mitigation for this intersection.

L-007-027

- The potential mitigation identified in the DEIS for NE 145th Street and 12th Avenue NE includes adding a two way left turn lane/refuge area on NE 145th Street. The City of Shoreline is concerned that this improvement will encourage drivers to use 12th Avenue NE as a cut through route, particularly when 15th Avenue NE is congested. The City of Shoreline disagrees with this proposed mitigation and recommends that it not be installed. The modeling should examine the impacts on 15th Avenue NE at NE 145th Street that this removal may cause. Additional mitigation may be required for 15th Avenue NE and Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation.
- The intersection at Meridian Avenue N and NE 145th Street is a high accident location. In order to improve safety, the intersection will need improvements in the form of northbound and southbound left turn pockets and signal phasing with protected turn movements. Left turn pockets for eastbound and westbound traffic on NE 145th Street may also be required. Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation for this intersection.

NE 185th Street Station

L-007-028

- Sidewalks already exist in much of the area around the station location. These sidewalks need to be adequate for anticipated pedestrian volumes. In order to facilitate pedestrian access to this station, Sound Transit should construct the following sidewalk improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Expand the width of existing sidewalks on NE 185th Street to eight feet along the frontage of the station, construct eight foot wide sidewalks along the transit center frontage, at nearby bus stops and from those bus stops to the nearest intersection. Construct a plaza and sidewalks along the station frontage adjacent to the transit center.
 - Construct sidewalks on NE 180th Street from 10th Avenue NE to 15th Avenue NE and 10th Avenue NE from NE 175th Street to NE 195th Street and the NE 195th Street pedestrian/bicycle bridge. This is a reasonable walking zone to connect riders coming from North City and north and east of the station.
 - Construct sidewalks on 5th Avenue NE from NE 185th Street to NE 195th Street. This will connect riders to the Interurban-Burke Gilman Trail connector, which is expected to be a major nonmotorized route to the station. It is a reasonable walking zone to connect riders coming from the north of the station.
 - Construct sidewalks on 5th Avenue NE/7th Avenue NE from NE 175th Street to NE 185th Street. This is a reasonable walking zone to connect riders coming from south of the station.

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or without the project, and the City's interest in addressing safety issues, consistent with its Transportation Master Plan, would be present in any case.

L-007-023

The Final EIS and its accompanying design documents have developed further details on access features for the Preferred Alternative. However, these designs are preliminary and details would be confirmed during final design, in collaboration with the City, WSDOT, and transit providers. A near-side bus stop for eastbound buses on NE 145th Street was included in the concept design because it required one street crossing versus two, to reach the station, but again, this configuration, as with all other elements in station areas, reflects the major features that define the physical footprint and operating characteristics that form the basis of the impact analysis contained in the EIS.

L-007-024

The major features of the Preferred Alternative are described in the Final EIS, and this includes the primary access facilities for the stations. During final design, Sound Transit will coordinate with the City to explore opportunities for improving station access. Some of the specific features described in the City's comment are more detailed than the conceptual to preliminary design developed to support the EIS, and these features would be considered in coordination with the City during final design.

L-007-025

The Final EIS has further details on the proposed treatment for the on-ramp intersection. However, final decisions would follow final design, in coordination with WSDOT, the City, and other involved agencies.

L-007-028

- Additional sidewalks on non-arterial streets near the station may also be required to facilitate pedestrian movement and safety.
- Should a parking structure be located on the east side of the freeway, any walkways from the structure to the station must be safe, comfortable and provide weather protection. Should a parking lot be constructed in the Seattle City Light right-of-way, sidewalks to the station should be widened to eight feet and provide weather protection.
- The NE 185th Street bridge will need improvements for pedestrians that are safe, comfortable and provide weather protection. This may come in the form of significant improvements or reconstruction of the NE 185th Street bridge. Should the parking structure be located on the west side of the freeway, a separate pedestrian overcrossing from the parking structure across Interstate 5 to the station may be required. The bridge should provide a strong connection to the Shoreline Center. Sound Transit will need to work with the City of Shoreline to identify the appropriate design and amenities for the bridge.
- Bus service to the station will be critical to provide an option for those who cannot or do not wish to drive in order to access light rail. The following transit improvements are needed at this station:
 - The NE 185th Station is likely to serve as a transit center, with Community Transit considering termination of their Swift BRT service there. The bus facilities at this station should be off-street and need to be adequate to provide ample space for the various routes serving it, including space for additional bus service as demand grows.
 - Safe facilities for riders boarding and deboarding buses and crossing streets should also be installed.
 - Bus pullouts are needed on NE 185th Street at stops near the station to minimize conflicts with bicycles and allow traffic to pass.

L-007-029

- Bicycle safety: N/NE 185th Street currently has bicycle lanes from Midvale Avenue N to 1st Avenue NE (The bicycle lanes will be continued to 10th Avenue NE by the City in fall 2013) and will be the primary east-west bicycle route serving the station. NE 195th Street will be the secondary east-west bicycle route serving the station. Bicyclists are likely to access NE 185th Street and the station via 1st Avenue NE, 5th Avenue NE, 7th Avenue NE and NE 195th Street. Bicyclists coming from North City and east of the station are likely to travel on NE 180th Street, 10th Avenue NE and NE 185th Street. Improvements on these and other routes bicyclists will use to access the station should be installed. The conflicts between bicyclists and buses should also be minimized and buses cannot block bicycle lanes. In order to facilitate bicycle access to this station, Sound Transit should construct the following bicycle improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Install bicycle lanes on 5th Avenue NE from NE 145th Street to NE 185th Street. These lanes will also serve the NE 145th Street or NE 155th Street station.
 - Install bicycle lanes on Meridian Avenue N from N 145th Street to N 200th Street. These lanes will also serve NE 145th Street or NE 155th Street station.
 - Install bicycle lanes on 5th Avenue NE from NE 185th Street to NE 195th Street. These lanes will connect with the Interurban-Burke-Gilman Connector route on NE 195th Street.

L-007-026

Sound Transit agrees operations in this area are complex, and that final design efforts will continue to explore the best options for ensuring effective operations. The Final EIS Chapter 3, Transportation, and the Transportation Technical Report have the results of an updated analysis of the NE 145th Street Station area using microsimulation software. This tool was also used to evaluate the effectiveness of mitigation measures described in the Final EIS.

L-007-027

Section 3.6, Potential Mitigation Measures of the Draft EIS, describes a potential measure to address the impacts at these intersections. As the Draft EIS states, Sound Transit will provide improvements as agreed to by the local jurisdiction. Sound Transit will continue coordination with the City of Shoreline to develop mitigation measures that are mutually acceptable.

L-007-028

Sidewalks: Sound Transit recognizes the City's interests in the conditions of its sidewalk system and in addressing safety concerns in its current system. As is appropriate for an EIS that is meant to identify significant environmental impacts for a proposed action, the EIS would not include a detailed inventory of sidewalk conditions around station areas, although the Transportation Technical Report does identify gaps. A number of the areas that are noted in the City's comments are included in the refined design developed for the Preferred Alternative. However, where the project does not alter existing facilities that may have current deficiencies, particularly in areas outside the immediate station area, the EIS continues to find that the potential for increased traffic alone does not create a safety impact. Continued growth in traffic would occur with or without the project, and the City's interest in addressing safety issues, consistent with its Transportation Master Plan, would be present in any case.

L-007-029

- Install bicycle lanes on 1st Avenue NE from NE 185th Street to NE 195th Street. These lanes will connect with the Interurban-Burke-Gilman Connector route on NE 195th Street.
- Install wayfinding signage directing cyclists to the station along new and existing bicycle facilities. This signage shall be consistent with the City of Shoreline's wayfinding program.
- Install facilities along new and existing bicycle routes serving the station to minimize the conflicts between bicyclists and buses or vehicles, including improvements that prevent buses from blocking bicycle lanes at stops. Kiss-and-ride facilities should not be located adjacent to bicycle facilities.

L-007-030

- The northeast corner of the intersection at NE 175th Street and 5th Avenue NE has a tight turning radius, which only the shortest Metro buses can navigate. If it is anticipated that larger buses will be utilizing this intersection to serve the station at NE 185th Street, this radius will need to be improved by Sound Transit.
- The potential improvements for 5th Avenue NE on the west side of Interstate 5 and 7th Avenue NE (5th Avenue NE on the east side) include adding a two-way left turn lane or refuge area on NE 185th Street. In addition to a turn lane/refuge area, the City of Shoreline believes a traffic signal will be needed for one or both of these intersections, depending upon the location of the parking garage, the transit center function and the realignment of 7th Avenue NE. It is likely that a signal will be needed at the transit center so that buses can exit quickly and safely. Sound Transit needs to perform additional analysis of these intersections and work with the City of Shoreline to identify the appropriate mitigation for them. Any roadway improvements will need to be in compliance with the City's road standards, including installation of bicycle and pedestrian facilities.
- Regardless of the alternative selected, the entire roadway from 1st Avenue NE to 10th Avenue NE will need to be rechannelized with a three lane cross-section and bicycle lanes to provide for continuous lanes. This will require removal of on-street parking.
- The analysis states that Meridian Avenue N and NE 185th Street will operate at LOS F in the No Build and all of the build options. The City of Shoreline believes that the No Build LOS F may be based on overestimated volume assumptions. The City assumed significant growth around the light rail stations as part of its traffic model provided to Sound Transit for analysis. However, if no light rail station is present, the assumptions would be very different for this area, with almost no growth planned in the vicinity. It appears Sound Transit's No Build alternative assumed the growth levels around light rail station areas in Shoreline would be the same with or without the light rail station. The City of Shoreline believes that the impacts to this intersection are significantly different under the No Build alternative and all options for this station. The City of Shoreline also believes that the proposed improvements of only adding protected-permissive phasing will not be sufficient to correct the level of service deficiencies and that the installation of northbound and southbound add/drop lanes is necessary to mitigate the impacts. Sound Transit needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it for all options.

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NE 185th Street Bridge: While design details would be further developed during final design, Sound Transit will coordinate the provision of acceptable non-motorized crossing facilities adjacent to or part of the 185th Street Bridge if needed to facilitate access to the station.

L-007-029

The major features of the Preferred Alternative are described in the Final EIS, and this includes the primary access facilities for the stations. During final design, Sound Transit will coordinate with the City to explore opportunities for improving station access. Some of the specific features described in the City's comment are more detailed than the conceptual to preliminary design developed to support the EIS, and these features would be considered in coordination with the City during final design.

L-007-030

As the Draft EIS states, Sound Transit will provide improvements as agreed to by the local jurisdiction. Sound Transit will continue coordination with the City of Shoreline to develop mitigation measures that are mutually acceptable.

NE 185th Street at 5th Avenue NE: No adverse impacts, but the Preferred Alternative includes some improvements in the 185th Station area.

NE 185th Street between 1st Avenue NE and 10 Avenue NE: No adverse impacts, potential coordinated improvements are possible along NE 185th Street between 1st Avenue NE and 10th Avenue NE.

NE 185th Street and Meridian Avenue N: The revised analysis shows that the Project causes a failing level of service (LOS) per local jurisdiction standards. Proposed mitigation includes adding protected-

L-007-030 | • The DEIS identifies the need for improvements at 10th Avenue NE (add an eastbound right turn pocket) only with the parking lots, not parking garages. The City of Shoreline believes improvements will be needed at this intersection for all of the parking options at this station location. Sound Transit needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it for all options.

L-007-031 | • A parking structure that is located on the west side of Interstate 5 could be jointly used by the Shoreline Center, particularly visitors to the Shoreline Stadium. The potential for shared use during off-peak hours should be explored to maximize the public benefit of this facility.

NE 155th Street Station

L-007-032 | As the City of Shoreline cover letter dated September 16, 2013 states, the City strongly prefers that a light rail station be located at NE 145th Street rather than NE 155th Street. The following comments outline the City of Shoreline's concerns and mitigation requirements should a station be located at NE 155th Street. These comments should not be construed as endorsement of the proposed NE 155th Street station location.

L-007-033 | • The pedestrian environment around the potential station at NE 155th Street requires improvements. In order to facilitate pedestrian access to this station, Sound Transit should construct the following sidewalk improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.

- Construct improvements to the pedestrian environment on NE 155th Street under the freeway including wider sidewalks that are separated from the travel lanes and pedestrian scale lighting.
- Expand the width of existing sidewalks on NE 155th Street to eight feet along the frontage of the station, at nearby bus stops and from those bus stops to the nearest intersection.
- Construct sidewalks on NE 1st Avenue NE from NE 145th Street to NE 155th Street. This is a reasonable walking zone to connect nearby residents and for riders coming the south of the station.
- Construct/install new and improved pedestrian crossings of NE 155th Street at 1st Avenue NE and at the bus stops. Sound Transit needs to work with the City to identify the appropriate design for these crossings, which may include signalization.
- Additional sidewalks on non-arterial streets near the station may also be required to facilitate pedestrian movement and safety.
- Any walkways from the parking structure to the station must be safe, comfortable and provide weather protection.

L-007-034 | • Bus service to the station will be critical to provide an option for those who cannot or do not wish to drive in order to access light rail. The following transit improvements are needed at this station:

- Depending upon how buses are routed to serve the station, there need to be safe facilities for riders boarding and deboarding buses and crossing streets, where necessary. This will be of particular importance if all bus stops are located on-street rather than within the station area.

permissive phasing to the northbound and southbound left-turn movements. This improves intersection operations similar to No Build conditions.

NE 185th Street and 10th Avenue NE: The revised analysis does not identify any adverse impacts and therefore no traffic improvements or mitigation are identified at the NE 185th Street and 10th Avenue NE intersection.

L-007-031

The parking supply anticipated to be needed for the transit project has continued to be the primary consideration in the currently proposed design. For the Preferred Alternative, Sound Transit has included a design option for a joint use parking garage on Shoreline School District Property at 185th Street adjacent to the Shoreline Stadium.

L-007-032

Sound Transit acknowledges the City's preference for a station at NE 145th Street over NE 155th Street, which also was noted in the Draft EIS.

L-007-033

The alternatives featuring a NE 155th Street Station have remained in the Final EIS, but as with the Preferred Alternative, the scope of the proposed features are focused on station areas rather than on improvements needed elsewhere in the transportation system where inadequacies may currently exist. Several of the issues would involve final design details; Sound Transit will develop final design details for the project selected to be built in coordination with the City.

L-007-034

As noted above, the conceptual design elements for the alternatives with

L-007-034

- Develop a transit patron loading and unloading area that is off-street in order to minimize street crossings and maximize safety for riders, similar to what is proposed at NE 185th Street. This area needs to be adequate to provide ample space for the various routes serving it, including space for additional bus service as demand grows.
- Bus pullouts are needed on NE 155th Street at stops near the station to minimize conflicts with bicycles and allow traffic to pass.

L-007-035

- N/NE 155th Street currently has bicycle lanes from Midvale Avenue N to 5th Avenue NE (bicycle lanes will be extended east to 15th Avenue NE by the City in 2014) and will be the primary east-west bicycle route serving the station. Bicyclists are likely to access NE 155th Street and the station via 5th Avenue NE, 10th Avenue NE and Meridian Avenue N. In order to facilitate bicycle access to this station, Sound Transit should construct the following bicycle improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Install bicycle lanes on 5th Avenue NE from NE 145th Street to NE 185th Street. These lanes will also serve the NE 185th Street station.
 - Install bicycle lanes on Meridian Avenue N from N 145th Street to N 200th Street. These lanes will also serve the NE 185th Street station.
 - Install sharrows on 10th Avenue NE from NE 155th Street to NE 175th Street.
 - Install bicycle facilities on 1st Avenue NE from NE 145th Street to NE 155th Street. The City's Transportation Master Plan did not anticipate the need for bicycle facilities on this street, as it was assumed that a light rail station would be located at NE 145th Street rather than NE 155th Street. Sound Transit needs to work with the City of Shoreline to identify the appropriate bicycle facilities for this roadway.
 - Install wayfinding signage directing cyclists to the station along new and existing bicycle facilities. This signage shall be consistent with the City of Shoreline's wayfinding program.
- Install facilities along new and existing bicycle routes serving the station to minimize the conflicts between bicyclists and buses, including improvements that prevent buses from blocking bicycle lanes at stops.

L-007-036

- The City of Shoreline agrees that the eastbound right turn lane at Aurora Avenue N and N 155th Street may need to be changed to a shared through/right-turn lane as suggested in the DEIS. Sound Transit needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it.
- Potential mitigation at NE 155th Street and 1st Avenue NE includes adding a right turn pocket. The City of Shoreline disagrees that this mitigation will address the identified problem and believes this intersection will require signalization. Sound Transit needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it.
- Potential mitigation at NE 165th Street and 5th Avenue NE includes adding a second northbound through lane on 5th Avenue NE. The City of Shoreline disagrees that this mitigation will address the identified problem and believes this intersection may require signalization. Sound Transit

the NE 155th Street Station remain largely as discussed in the Draft EIS. As with the Preferred Alternative, Sound Transit will develop final design details for the project selected to be built in collaboration with the City, WSDOT, and transit providers. All facilities would be designed to provide safe and effective access.

L-007-035

The alternatives featuring a NE 155th Street Station have remained in the Final EIS, but as with the Preferred Alternative, the scope of the proposed features are focused on station areas rather than on improvements needed elsewhere in the transportation system where inadequacies may exist. Several of the issues would involve final design details; Sound Transit will develop final design details for the project selected to be built in coordination with the City.

L-007-036

Not affected by the Preferred Alternative. For the Final EIS discussion, options to address the impact for other light rail alternatives could include a range of measures ranging from signalization to the proposal already included in the Draft EIS. As noted in the Draft EIS, Sound Transit would provide the potential improvements discussed or other improvements as agreed to by the local jurisdiction during final design.

L-007-036 | needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it.

L-007-037 |

- Provide a correction in the FEIS that there is only one option remaining for paratransit and passenger pick up/drop off locations and that it is off street.

L-007-038 | Parking

- The parking analysis evaluated utilization between 9 am and 11 am and 1 pm and 4 pm. While it is likely that cars will be parked there during those times, drivers that will park in the neighborhoods are likely to arrive earlier and leave later, when local residents still have vehicles parked on street or are returning home. Thus, Sound Transit did not evaluate the worst case scenario for parking impacts. The City of Shoreline is uncertain that the potential for spillover parking is low simply because a large garage is planned as stated in the DEIS, as this does not seem consistent with Sound Transit's experience elsewhere. The DEIS states "For parking controls agreed to with the local jurisdiction, Sound Transit would be responsible for the cost of installing the signage or other parking controls for 1 year after opening the light rail system. The local jurisdictions would be responsible for monitoring the parking controls and providing all enforcement and maintenance". The City of Shoreline does not agree with this mitigation. Sound Transit should set aside funding to work with the City of Shoreline once the stations are complete and service is in operation to identify and fund solutions that reduce/mitigate spillover parking. This may include funding the establishment and enforcement of a residential parking zone for five years. Sound Transit could also consider utilizing parking revenues to fund parking management/enforcement in Shoreline.

Land Use

- L-007-039** |
 - When describing the City of Shoreline's Comprehensive Plan Land Use Policies, the DEIS states "The land use policies would further guide land use regulations for station areas at NE 145th and NE 185th streets, including transit-supportive developments with residential components mixed with complementary commercial and office uses". Please note that the City's policies will recommend high-density residential in the station areas around NE 145th Street and NE 185th Street as part of transit-supportive developments.
 - As part of its light rail station subarea planning process, the City of Shoreline will explore the creation of development regulations addressing the location of commercial/retail uses as part of parking structures. Sound Transit is subject to the City's land use regulations when developing the light rail stations and associated facilities.

Visual and Aesthetic Resources

- L-007-040** |
 - Removal of significant trees is regulated by and may be partly mitigated by replacement as prescribed in the Shoreline Municipal Code. Mitigation for the visual impacts associated with tree removal should include replacement with larger sized trees. Sound Transit should plant replacement vegetation as early as possible to help minimize visual impacts. This may include installation of replacement vegetation outside of disturbance areas prior to construction.

L-007-037

The text describing paratransit elements for the NE 155th Station has been updated for the Final EIS.

L-007-038

The parking inventory was performed during the times when the parking garages are assumed to have the highest utilization and the potential for spillover parking would be greatest. The Final EIS describes the proposed mitigation approach to address the potential for spillover parking.

L-007-039

The Final EIS has been updated to reflect the City's most current adopted Comprehensive Plan Land Use policies.

L-007-040

Sound Transit will comply with the City of Shoreline tree replacement regulations as applicable and feasible. The City of Shoreline's comments about mitigation for loss of significant trees, including larger specimens, as well as the incorporation of public art, are consistent with the list of mitigation measures on Draft EIS pages 4-91 through 4-93, which include landscaping and elements providing visual interest. Refinement of mitigation approaches will continue through final design.

- It will be important to coordinate with the City regarding station design. The design must comply with the City's commercial, station area or other applicable design standards, depending on the ultimate zoning of the station sites. Other potential mitigation for visual impact would be to use 1% for art on areas that have a high visual impact and low potential for screening.

Noise and Vibration

- Noise walls should be relocated and/or constructed as early as possible to help minimize noise impacts associated with construction.
- Sound Transit should work with property owners both during the design and construction phases to ensure all noise and vibration impacts have been properly mitigated. Once the project is completed and service is operational, Sound Transit should continue to work with property owners to ensure all noise and vibration impacts have been mitigated.

Ecosystem Resources

- Mitigation for wetland impacts shall be as described in Shoreline Municipal Code, including replacement at the ratio described in the code and no net loss of function and value of wetland resources.

Water Resources

- Page I-4.9-7 (Appendix I) lists the stormwater design manuals for jurisdictions in which construction will occur. While these are the current requirements, the National Pollutant Discharge Elimination System Phase II permit will require all jurisdictions to adopt the 2012 Stormwater Manual or equivalent by end of 2016. The stormwater design manuals in some of the jurisdictions are likely to change with the adoption of new requirements.
- All construction and improvements must comply with the City's adopted regulations for stormwater management, including Low Impact Development.

Geology and Soils

- Figure I-4.11-2b does not identify peat located near Ronald Bog located at NE 175th Street and Meridian Avenue N, just west of Interstate 5. It is known that peat exists in this area, however, it is unknown the extent and/or if it extends east of Interstate 5. The area under Interstate 5 was a wetland prior to construction. Since peat is not shown where it is known to exist, soil conditions should be verified in the area east of Interstate 5 where support may be needed. Sound Transit should conduct additional borings in that area to confirm conditions.

Public Services, Safety and Security

- The proposed light rail station at NE 155th Street places the fire station between the light rail station and the parking facility. This location and layout will interfere with the existing Fire

L-007-041

For at-grade noise walls, it is normally the practice to install these walls early in the construction process to aid in the reduction of construction noise levels. This statement was included in the construction noise mitigation section.

Sound Transit will work with property owners during the design, construction, and operation phases of the project to ensure noise and vibration impacts are mitigated to levels below FTA impact thresholds and local criteria.

L-007-042

As noted in the Draft EIS Chapter 2, Environmental Practices and Commitments, Sound Transit will obtain permits required under local critical area codes, including those of the City of Shoreline, and will meet the permit requirements. Where major compensatory mitigation measures are known, potential sites were identified in the Draft EIS and have been refined in the Final EIS, and the anticipated standards are discussed, with details to be further confirmed during permitting phases of the project.

L-007-043

Thank you for your comment pertaining to the stormwater design manuals and the use of low-impact development (LID). Sound Transit will abide by all applicable stormwater design standards and latest approved manuals in the City of Shoreline code, as well as with the updated NPDES Phase II permit requirements. In addition, Sound Transit requires all projects to consider LID methods as a first choice for stormwater treatment (Design Criteria Manual, July 2012), and the agency will continue to review the feasibility of LID strategies as part of the project design.

L-007-045

Station just east of Interstate 5 due to increased bus, vehicle, pedestrian and bicycle traffic generated by the light rail station, thereby negatively impacting emergency response times. Depending on the specific design of the rail line itself and/or the station and the subsequent increase in traffic, the fire department may have to consider moving the facility all together. Sound Transit shall work with the Shoreline Fire Department to ensure emergency service functions and operations can continue during construction and with operation of the light rail station or relocate the fire station.

- In addition to other public safety providers, Sound Transit Police will also have jurisdiction at the light rail stations, which will influence response times. The impacts of this coordination and strategies to reduce redundancies between providers should be described in the FEIS.
- The majority of existing open-air (non-tunnel) Sound Transit stations do not have security personnel physically present as a deterrent. Many stations are monitored via camera by security personnel, who then have to report activity via phone and radio, creating ineffective prevention and response. At minimum, the physical presence of security personnel actively patrolling the facilities and buses serving the stations, combined with CCTV active monitoring, are necessary for prevention and timely reporting. Security shall be funded by Sound Transit.
- Safety and security needs to be fully integrated with design of the stations, parking structures and other facilities. Design of facilities shall be coordinated with the City of Shoreline Police Department. Safety issues that need to be addressed include:
 - Integration of Crime Prevention Through Environmental Design (CPTED) into all facilities.
 - Elevated platform emergency response requires more planning and redundant design features due to choke points inherent to mass movement to the boarding platform.
 - Sound Transit should consider developing City of Shoreline stations as closed system design, requiring pay at surface/grade level in order to enter areas for ridership flow and access to light rail vehicles.
 - Guideways will need significant passive barriers that prevent access to elevated, as well as at grade, locations not intended for rider use. Barriers should be integrated into overall security and CPTED design, as it would serve as a deterrent to theft and vandalism.

Utilities

L-007-046

- The DEIS identifies a 24-inch diameter water line crossing at NE 185th Street (this is incorrectly identified as a Shoreline Water District water line; it is a Seattle Public Utilities water line). Any modifications to or replacement of the NE 185th Street bridge must be sure not to impact this line or disrupt service to customers. This water line may need to be replaced. The City of Shoreline is in the process of acquiring the Seattle Public Utilities water utility located within the city limits and anticipates ownership will be completed by 2020. All design and construction discussions about impacts to this and other Seattle Public Utilities water utility facilities located within the City of Shoreline shall include Shoreline staff prior to and after the acquisition is complete.

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L-007-044

Sound Transit is aware of the presence of peat near Ronald Bog and has conducted additional borings on the east side of I-5 to further define soil and groundwater conditions in this area. Additional work and related analysis will be conducted during final design and permitting.

L-007-045

Issue 1: Effects on fire station. Sound Transit is aware of the Fire Department's concerns about the possible impacts of a station at NE 155th Street on the operations of the fire station at that location. In the design and development of a station at that location, and the management of traffic serving the station, Sound Transit would work closely with the Fire Department to resolve any potential conflicts with bus and vehicle traffic to ensure that emergency response times would be maintained both during the construction period and operation of light rail.

Issue 2: Sound Transit Police jurisdiction. Sound Transit currently has several years of experience working in coordination with the public safety providers of local jurisdictions to ensure the safety and security of the public and to reduce redundancies. The Draft EIS discussed Sound Transit's security force, and states that final station designs will incorporate crime prevention through environmental design principles to deter criminal activity and to make station areas safer and more secure.

Issue 3: Open air stations need to have personnel actively patrolling the facilities and buses serving the stations at all times. Sound Transit now has several years of experience with safety and security across all modes, and is confident that its operating systems are appropriate to ensure the personal and physical safety of its passengers. Sound Transit is currently centralizing its video and alarm monitoring system across all modes, including vehicles and stations, and constantly reviews its operations to ensure passenger safety.

L-007-046

- As part of the City of Shoreline's acquisition of the portion of the Seattle Public Utilities water system located within Shoreline, the City is required to separate the system including installation of a new trunk line in the N/NE 145th Street right-of-way. This construction work is likely to occur from 2018-2020, at which time construction on the Lynnwood Link Extension will be underway. As design progresses for both projects, Sound Transit and the City of Shoreline will need to coordinate water line construction schedules to determine the best course of action to minimize disruption to residents and users of the corridor. Opportunities for construction efficiencies should also be explored.

Parks and Recreational Resources/4(f) and 6(f) Evaluation

L-007-047

- Construction will impact Ridgecrest Park as well as access to the park. The DEIS includes a general list of construction mitigation options and states that Sound Transit will work with jurisdictions to develop appropriate construction mitigation. As design progresses and construction plans are developed, the City will work with Sound Transit to identify mitigation to minimize construction impacts to park users and plans for restoration of disturbed areas.
- Ridgecrest Park was originally purchased by King County with Forward Thrust funding. In accordance with the requirements of Forward Thrust, any park land acquired must be replaced with like property. It will be Sound Transit's responsibility to coordinate with King County to prepare the land conversion process with like property. The conversion has to be approved by King County before the City of Shoreline can authorize purchase of the property for the Lynnwood Link Extension. Sound Transit will need to work with the City's Parks Department to identify the appropriate location and type of mitigation for this acquisition.

Construction

L-007-048

- Should the NE 185th Street bridge need to be reconstructed, the DEIS states that the roadway may need to be closed for 9-12 months. A closure of this magnitude will have significant impacts to the community. It will eliminate a major east-west access roadway and result in additional congestion at NE 175th Street, as drivers utilize this roadway as a substitute. Shoreline has a strong preference against full closure of this key arterial corridor and will require Sound Transit to develop options to avoid one, such as a temporary bridge or a half closure. The DEIS does not identify how other roadways, such as NE 175th Street, will be impacted if the NE 185th Street bridge is closed. There is no discussion of any impacts, suggested detours or mitigation. Sound Transit should explore alternative construction methods that do not require a full closure of the roadway should this bridge need to be reconstructed. Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation for these construction impacts.
- Reconstruction or improvements to the NE 185th Street bridge will need to be staggered with reconstruction of the NE 195th Street bridge so that at least one bridge is usable for bicyclists and pedestrians at all times.
- Shoreline will want to be involved in the early development of construction plans for this project. Coordination between Shoreline, Sound Transit and other agencies will include issues such as phasing and timing for various stages of construction, rerouting of bus service, impacts

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Issue 4: Safety and security in design of station and other facilities. Sound Transit integrates Crime Prevention Through Environmental Design (CPTED), as included in Section 4.14.2 in the Draft EIS, in the design of all its facilities. All station platforms, including elevated platforms, are designed to accommodate emergency response and to be able to safely evacuate trains and platforms in the event of an incident. Design and security measures are used to prevent access to areas not intended for rider use.

L-007-046

Geographic Information System (GIS) data on the 24-inch-diameter water line crossing at NE 185th Street confirms that this water line is a Seattle Public Utility water line. It was incorrectly identified in the Utility Conflict Matrix as a Shoreline Water District water line and this was updated for the Final EIS. As the Draft EIS states in Section 4.15.2, Sound Transit will coordinate with the utilities to confirm and resolve potential conflicts. Sound Transit will also continue to work with utility providers to minimize any potential service interruptions (Section 4.15.5 Mitigation).

L-007-047

The Final EIS notes Sound Transit's commitment to working with the City and King County to address Forward Thrust requirements as they apply to the park, and to help the City identify appropriate property to acquire for parks use as compensatory mitigation. Potential replacement property options have been described in the Final EIS. Additional coordination with the City is reflected in the Final EIS.

L-007-048

Bullet 1 (Should the NE 185th...) With the Preferred Alternative the NE 185th Street bridge would not be rebuilt, although some access

to Ridgecrest Park, utility relocations including the City's waterline separation work at N/NE 145th Street, night work, truck/haul routes, detour routes, hazardous materials response planning and inspection coordination.

- The review of plans and construction management for this project will result in a significant work load for the City of Shoreline employees. Sound Transit will need to provide funding to the City to pay for additional human resources tasked with design and construction related review of the project.
- Mitigation is required to ensure that bus service is minimally interrupted during construction. Because the North Jackson Park park and ride facility at NE 145th Street and 5th Avenue NE will be used for construction staging, an alternative, temporary park and ride facility(ies) shall be sited and signed in the vicinity for routes that serve it. The existing transit only off ramps should remain in operation until light rail service begins and bus service is permanently rerouted.
- When access to properties is impacted, it should be partial only. Sound Transit shall maintain access to all properties during construction unless an alternative is mutually agreed upon by Sound Transit and the property owner. Exceptions may include short duration full closures for tasks such as paving and pouring and curing concrete.
- Noise from construction, including night work, must be mitigated to the fullest extent possible.
- Construction equipment has the potential to impact the condition of roadways that are part of haul routes. An assessment of the pavement condition for roads serving the station should be performed by Sound Transit and approved by the City before and after construction to help document any damage that occurs during construction. Damage to roadways resulting from construction activities must be repaired by Sound Transit.
- Measures should be taken during construction to avoid any short term impacts to Thornton Creek. Appropriate Best Management Practices shall be implemented and monitored during construction to avoid impacts to water quality.

modifications for pedestrians may be added; there would be no full closure. For Alternative A1, the Transportation Technical Report incorrectly stated in Table 6-1 for Alternative A1 that the bridge would be fully closed for 9-12 months. This error has been revised to indicate that one lane of the bridge would be closed in each direction for 1 month, as stated in the Draft EIS on page 3-44 and in Table 3-24.

Bullet 2 (Reconstruction or improvements...) The Draft EIS states construction of NE 185th Street would be staged or staggered (Section 3.3 page 3-43).

Bullet 3 Sound Transit will involve the City in the development and review of final design details, including construction plans.

Bullet 4 Agreements associated with the next phases of the project will be negotiated as the project moves forward.

Bullet 5 Mitigation for bus service during construction was described in section 3.6.9 of the Draft EIS (page 3-55), and more detail on the degree of mitigation for the specific stations and routes has been included in Section 3.6 of the Final EIS for the Preferred Alternative.

Bullet 6 The Draft EIS, Section 3.6.9 Arterials and Local Streets, states that *if access to the property cannot be maintained, the specific construction activity would be reviewed to determine if it could occur during non-business hours, or if the parking spaces and users of this access (for example, deliveries) could be provided at an alternative location.*

Bullet 7 (noise from construction...) Section 4.7.7 of the Draft EIS describes potential mitigation measures for construction-generated noise. Specifically, Section 4.4.7 states that noise mitigation would be implemented in order to meet local regulatory requirements, noise



SHORELINE
CITY COUNCIL

Keith A. McGlashan
Mayor

Chris Eggen
Deputy Mayor

Will Hall

Doris McConnell

Chris Roberts

Jesse Salomon

Shari Winstead

L-007-049

April 11, 2012

The Honorable Fred Butler
Chair, Sound Transit Capital Committee
401 South Jackson Street
Seattle, WA 98104-2826

Re: Screening Alternatives for the North Corridor Transit Project

Dear Chair Butler:

The City of Shoreline looks forward to the extension of light rail north and is excited for new transit service for our residents and the region. As Sound Transit is currently considering station locations and alignment for the Lynnwood Extension project to be considered in the Draft Environmental Impact Statement, the Shoreline City Council would like to provide our input in this critical process.

The City Council has reviewed the potential station locations and route alignment and has determined that the best fit for our community and the success of the project overall is to place stations at 145th Street and 185th Street, with alignment on the east side of I-5.

We believe that these station locations provide the greatest opportunities for redevelopment around the station areas, minimize traffic impacts in neighborhoods, are the most readily accessible and can best be served by transit. To prepare for these future stations, Council is developing framework policies for adoption in May to guide station area planning that will allow for future transit oriented development around the stations. The Council is committed to working with our community to plan for new residential and commercial opportunities.

We are concerned about the inclusion of a potential station at 155th Street in Shoreline. When applying our draft framework policies to the possible station locations in conjunction with consideration of the existing surrounding land uses, NE 145th Street shows significantly greater potential for transit oriented development. Its proximity to the commercial node at 15th Avenue NE, Aurora Avenue N, Lakeside School and multi-family development along the 145th Street corridor strengthen future opportunities for successful redevelopment that complements and focuses on the use of transit as a primary transportation mode.

We understand that the evaluation of a station at NE 125th Street or NE 130th Street will be performed as a pairing with a station at NE 155th Street and these two stations would serve as a substitute for a station at NE 145th Street. We

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ordinances, and permit and variance conditions.

Bullet 8 (Construction equipment..) Sound Transit will repair any public rights-of-way at Sound Transit work sites that are damaged during construction to substantially the same condition.

Bullet 9 Sound Transit recognizes the importance of Thornton Creek, and the project will abide by all applicable federal, state, and local environmental laws and regulations. Sound Transit's policy [Executive Order No. 1, Establishing a Sustainability Initiative for Sound Transit (2007)] on ecosystem mitigation is to avoid impacts on environmentally sensitive resources to the maximum extent practicable and to provide adequate mitigation to ensure no net loss of ecosystem function and acreage as a result of agency projects. The Lynnwood Link Extension would mitigate impacts on ecosystem resources in accordance with the mitigation sequencing requirements established by NEPA, the Clean Water Act, and local critical areas ordinances.

L-007-049

Thank you for enclosing the City's earlier letter to Sound Transit expressing its views on the range of alternatives the Sound Transit Board was considering for the Draft EIS. Because this letter predates the Draft EIS, no detailed responses are provided here.

understand that the rationale provided for pairing these stations, rather than considering NE 145th Street instead of NE 155th Street is the need to maintain stop spacing of no less than one mile. It is Shoreline's contention that each of these stations needs to be evaluated on its own merits so that they can be fairly compared to one another.

Additionally, the inclusion of a fifth station in the North Corridor Transit project was not anticipated as part of the voter approved ST2 funding package. Should an additional station be approved at NE 125th Street/NE 130th Street, we want Sound Transit to ensure that its design and construction is adequately funded and will not result in the reduction or elimination of facilities, amenities or mitigation at the remaining two stations in the North King subarea.

Finally, the ST2 conceptual alignment includes parking garages at both stations with 500 parking stalls each. The City understands the need for parking facilities at the stations and would like Sound Transit to include evaluation of parking needs as part of the DEIS. As part of this evaluation, we are requesting that Sound Transit examine options that include both a single parking structure for each station and concepts that include multiple, smaller structures. It is the City's belief that while parking is needed, there may be a time in the future where less parking is needed, as riders utilize transit or non-motorized options to access the stations. In those circumstances, the garages may be converted to new uses or provide parking for new developments near the stations. By having parking garages at the two Shoreline stations, Sound Transit would be improving transit access to the region.

Thank you for your consideration of our comments. We look forward to continuing to work with Sound Transit and our neighbors on this important project. If you have any questions or need additional information, feel free to contact Alicia McIntire, Senior Transportation Planner, at 206.801.2483.

Sincerely,



Keith A. McGlashan
Mayor

- cc. Joni Earl, CEO Sound Transit
- Sound Transit Board
- Shoreline City Council
- Matt Sheldon, North Corridor Project Manager
- Julie T. Underwood, City Manager
- Mark Relph, Public Works Director
- Scott MacColl, Intergovernmental Relations Manager
- Alicia McIntire, Senior Transportation Planner