



City of Mountlake Terrace
6100 - 219th Street SW, Suite 200
Mountlake Terrace, WA 98043-2222
425.778.1161
www.cityofmlt.com

September 12, 2013

Dear Sound Transit Board:

Thanks for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Lynnwood Link Extension. We appreciate the excellent work and countless hours that has gone into issuing this document.

Our City Council has long been an advocate for light rail for our region. Accordingly, we began planning for transit-oriented development in key areas of our community more than ten years ago. Our focus has been greatest in revitalizing our downtown/Town Center, which is near 236th Street SW, just east of I-5, as well as in developing the commercial/mixed use area immediately south of 236th and also just east of I-5. The latter area includes about 12 acres of vacant land in two parcels, which we have zoned for compact development up to 20 stories. In addition, we have adopted Comprehensive Plan and zoning changes to allow compact, mixed-use development along 220th Street SW, just west of I-5. This area includes about six acres of undeveloped property owned by the Edmonds School District.

L-008-001 We like Alternative B1 for its location of a station at 236th Street SW, close to the Town Center and Freeway/Tourist District. However, it does not support transit oriented development at 220th Street SW, where extensive development is possible.

L-008-002 We ask that you select Alternative B2 or B2A as the Preferred Alternative for rail alignment and station locations that will be included in the Final Environmental Impact Statement. Both alternatives, as with Alternative B1, support a station just east of I-5 at 236th. As with Alternative B1, this station location would provide the greatest opportunity for transit-oriented development and would support our community's Town Center vision. In addition, Alternative B2 has the light rail line crossing from the east side of I-5 to the west side (where at some point it needs to be located anyway to accommodate the Lynnwood connection) in a way that makes it possible for a station to be added at 220th in the future. Alternative B2A is the same as B2 except that it includes actually building the station at 220th.

L-008-003 The alternative we do not favor as the Preferred Alternative is Alternative B4. It provides light rail mostly in the freeway median and would have at least 1,000 less riders daily than any of the other three alternatives for the B section of Lynnwood Link. This is the least supportive of transit-oriented development and downtown revitalization.

We look forward to continuing our partnership and seeing light rail constructed in Snohomish County to attract the greatest ridership possible.

Regards,

Jerry Smith, Mayor

cc: Mountlake Terrace City Council
Scott Hugill, Interim City Manager
Shane Hope, Community and Economic Development Director

L-008-001

Thank you for your observations on Alternative B1.

L-008-002

Thank you for stating your preference for Alternative B2 or B2A. A modified version of Alternative B2 is part of the Preferred Alternative. The modification shifts the alignment west to avoid impacts to the I-5 ramps. The Final EIS also includes an optional station south of 220th Street SW and a 200-car surface parking lot on the site of the former Melody High School.

L-008-003

Thank you for your comment stating your objections to Alternative B4.



EDMONDS SCHOOL DISTRICT

20420 68th Ave. W., Lynnwood, WA 98036-7400
http://www.edmonds.wednet.edu

Stewart Mhyre, MBA, CSB.
Executive Director
Business & Operations

Serving the communities and Students of Brier, Edmonds, Lynnwood, Mountlake Terrace, Woodway and unincorporated Snohomish County

September 20, 2013

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

LynnwoodLinkDEIS@soundtransit.org

Dear Sound Transit Board,

Thank for the opportunity to comment on the Draft Environmental Impact Statement for the Lynnwood Link Extension. I appreciate the numerous occasions for input into the process.

After reviewing all of the alternatives, I have the following feedback for your consideration.

- L-009-001** | 1. Select Alternative B2, putting the Transit Center stop to the east of the current Mountlake Terrace Transit Station.
- L-009-002** | 2. I prefer Alternative B2 or B2A with the alignment going across 220th to the west of the freeway with a possible future transit stop at 220th.
- L-009-003** | 3. Approve the City of Lynnwood's C3 Modified Alternative to be incorporated as part of the Final EIS for the Lynnwood Link Extension. Because of the extensive impact this alternative has for Edmonds School District and its planned use of this property for a Maintenance and Transportation facility, I ask that the District be invited to be a participant in the engineering and planning process of this alternative.

As stated in Section 4.1.2, Long Term Impacts, Segment C, Sound Transit will need to mitigate the impacts to our planned use for this property. The effected facility will most likely be in operation during the construction phase of the C3 Modified Alternative as well as when the link extension is operational.

I look forward to continuing to work with the staff of Sound Transit as they move closer to seeing the much needed Lynnwood Link Extension become a reality.

Sincerely,

Stewart Mhyre, MBA, CSBA
Executive Director – Business & Operations

Cc: Shane Hope, Community & Economic Development Director-City of Mountlake Terrace
David Kleitsch, Economic Development Director-City of Lynnwood

• OUR MISSION •

To ADVOCATE for all students by PROVIDING a learning environment which EMPOWERS students, staff and the community to MAXIMIZE their personal, creative and academic potential in order to BECOME lifelong learners and responsible world citizens.

L-009-001

Thank you for stating a preference for Alternative B2 and a possible future transit station at 220th Street SW. A modified version of Alternative B2 is part of the Preferred Alternative. The modification shifts the alignment west to avoid impacts to the I-5 ramps. The Final EIS also includes an optional station south of 220th Street SW and a 200-car surface parking lot on the site of the former Melody High School.

L-009-002

Thank you for stating your preferred alignment. See the response to comment L-009-001 describing the Sound Transit Board's Preferred Alternative.

L-009-003

Sound Transit appreciates the participation of the District in reviewing potential refinements in Segment C that would reduce potential impacts to the District's property. Sound Transit involved the Edmonds School District in meetings with the City of Lynnwood in the development of modified Alternative C3 that is evaluated in the Final EIS. The Final EIS also provides further detail on how Sound Transit would work with the City and the School District during final design and in construction planning to minimize impacts to the District's operations.



CITY OF LYNNWOOD

RESOLUTION NO. 2013 - 10

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LYNNWOOD, WASHINGTON MAKING A RECOMMENDATION FOR A PREFERRED ALIGNMENT & STATION LOCATION FOR THE SOUND TRANSIT LYNNWOOD LINK LIGHT RAIL EXTENSION TO LYNNWOOD AND FORWARDING CITY COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

WHEREAS, In 2008, the voters authorized Sound Transit to proceed with an expansion of their Light Rail Transit system to include service to Lynnwood (Lynnwood Link) under ST2; and

WHEREAS, ST2 supports the policies of the Puget Sound Regional Council Vision 2040, which identifies Lynnwood as a Regional Growth Center, including the City Center, serving as a primary framework for regional transportation and economic development planning; and

WHEREAS, ST2 will provide Light Rail Transit service connections as an alternative transportation system between Lynnwood and Seattle, University of Washington, Bellevue and SeaTac Airport regardless of weather or traffic conditions; and

WHEREAS, if the voters approve the third phase of light rail expansion (ST3), Light Rail Transit would be extended from Lynnwood to Everett thereby further tying the region together and furthering the importance of the Lynnwood Regional Growth Center including the Lynnwood City Center; and

WHEREAS, ST2 Light Rail Transit will benefit Lynnwood residents and businesses and will serve as a catalyst for economic development in the Lynnwood City Center area; and

WHEREAS, Sound Transit has developed three alternative alignments and station locations for bringing light rail into the Lynnwood Transit Center and has analyzed their impacts in a Draft Environmental Impact Statement; and

WHEREAS, the City of Lynnwood held three, well attended public information meetings on the Lynnwood Link alignment and station location alternatives and received significant input from residents and businesses; and

L-010-001

Thank you for providing the City Council's recommendation for a preferred alignment and station location for the proposed Lynnwood Link Extension and providing comments on the Draft EIS. As you know, Sound Transit continued to work with the City and others to define a modification to Alternative C3 that incorporated this suggestion, and it has been analyzed in the Final EIS.

L-010-001

WHEREAS, the proposed C1 alignment is located directly across 52nd Ave. from a single family neighborhood containing hundreds of affordable homes, requires the removal of a condominium development and numerous businesses along 200th St., is across 200th St. from several affordable apartment and condominium complexes, all of which would be adversely impacted by noise, vibration, decline in property value, and other impacts from the elevated tracks; and

WHEREAS, the proposed C1 alignment is routed through a significant recreational resource in the form of the City's Scriber Creek Park that provides a place to experience nature in close proximity to Lynnwood's City Center; and

WHEREAS, Scriber Creek Park was acquired using Conservation Futures funding from Snohomish County, and WHEREAS, the proposed C2 alignment results in impacts similar to C1 to homes along 52nd Ave, impacts businesses along Cedar Valley Road, while not located within Scriber Creek Park and trail they are impacted due proximity, impacts Scriber Creek wetlands adjacent to the Park, and results in noise, vibration, and visual issues to these sensitive areas, and

WHEREAS, the proposed C3 alignment would result in significant property damage and loss of development potential on the City Center block located east of 44th and adjacent to I-5, would result in a station location remote from the bus transit center, existing residential development, public streets and City Center, would require reconstruction of the existing bus loading areas at great additional expense, would impact the City's ability to maintain and expand Sanitary Sewer Lift Station 10, and fails to address flooding and odor issues in the immediate area; and

WHEREAS, the City has developed a "C3 Modified" alignment and station location that offers the benefits of C3 in terms of avoiding impacts of C1 and C2 while also addressing the issues associated with C3; and

WHEREAS, the City of Lynnwood wishes to make Sound Transit aware of the City's preferences on potential alignments and station locations to insure they will be considered by the Sound Transit Board for their determination of a "Preferred Alternative".

THE CITY COUNCIL OF THE CITY OF LYNNWOOD, WASHINGTON, RESOLVES AS FOLLOWS:

1. That based upon a detailed analysis of the alternatives, review of the Draft Environmental Impact Statement and extensive public outreach efforts by the City, the Council is hereby expressing its preference for:

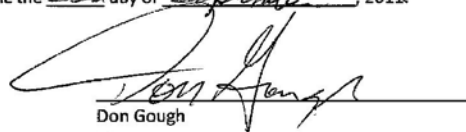
L-010-001

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- "C3 Modified" that minimizes impacts to Lynnwood residents, businesses, development potential, parks and environment, while still offering the transportation benefits of Light Rail Transit service and the implementation of economic development planning policies.

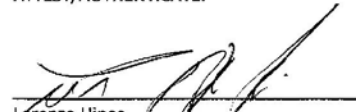
2. That the City and Sound Transit will work directly together on "C3 Modified" as the preferred alternative Lynnwood Link Final Environmental Impact Statement to address mutual and respective goals for Sound Transit ST2 and the City of Lynnwood City Center Plan as part of the PSRC Regional Growth Center Strategy.

PASSED BY THE CITY COUNCIL the 23rd day of September, ~~2013~~ ²⁰¹³.



Don Gough
Mayor

ATTEST/AUTHENTICATE:



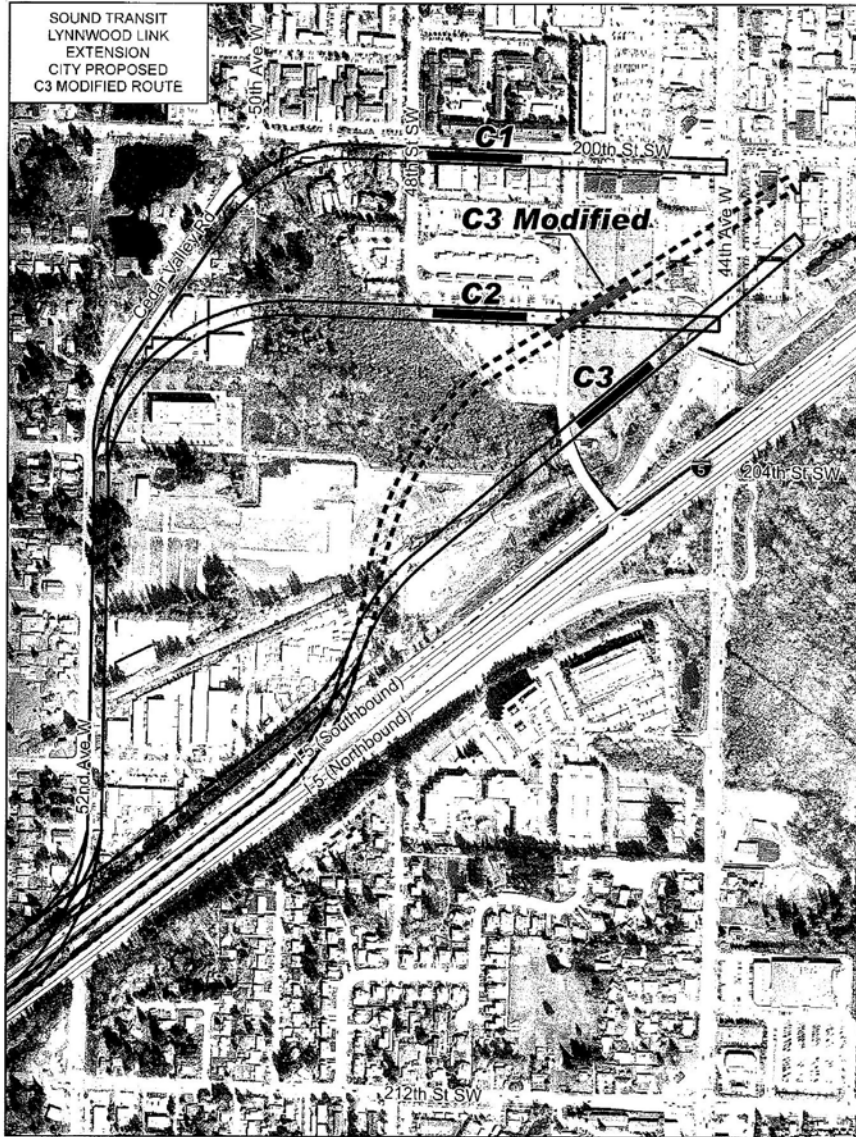
Lorenzo Hines

Finance Director, City Clerk

Resolution Number: 2013-10

Approved by Council: 6-0

Vote:





September 20, 2013

Joni M. Earl
Chief Executive Officer
Sound Transit
401 S. Jackson St.
Seattle, WA 98104-2826

RE: Lynnwood Link DEIS comments

Dear Ms. Earl:

The City of Seattle is excited about the expansion of the regional transit system with the Lynnwood Link Extension. We appreciate the opportunity to comment in more detail on the proposed alignment and station alternatives presented in the DEIS. This letter represents joint recommendations from the Seattle Department of Transportation (SDOT) and the Seattle Department of Planning and Development (DPD). In addition to the alignment and station recommendations in this letter, you will also find a listing of more detailed comments, including coordinated comments from other city departments.

- L-011-001** • **Seattle supports the A1 alignment option through Seattle** (*this alignment recommendation does not include the proposed A1 station locations*). This alignment best supports Sound Transit's Sustainability Plan by reducing noise and long-term visual impacts of adjacent neighborhoods, reducing private property impacts, replacing the 117th bridge benefitting bike and pedestrian connections, and reconfiguring the NE 130th freeway off-ramp addressing a high accident location. The related recommendations below further support and enhance the A1 track plan through Seattle.
- L-011-002** ○ Work closely with SDOT and the Latvian Evangelical Lutheran Church and Center at 11710 3rd Avenue NE to maintain Seattle right-of-way to the facility. It is a priority to maintain access to this cultural, religious, and education center at the current location.
- L-011-003** ○ In the reconstruction of 1st Avenue NE, work with Seattle to retain the trees and green space on the east side of 1st between 113th and 115th Street, which serves as a buffer to the Northgate West Condominiums.
- L-011-004** ○ In the reconstruction of 1st Avenue NE and the 117th Street bridge, provide a 14' shared use bike and pedestrian facility on the north side of the bridge and a 8' sidewalk on the south side of the bridge connecting into similar facilities on the relocated 1st Avenue NE. Ensure these facilities connect to the existing bicycle trail at NE 116th Street.

L-011-001

Thank you for your comment stating a preference for Alternative A1, including the features that the City finds most promising. The Sound Transit Board identified a Preferred Alternative based on Alternative A1, but modified some of the alternative's features.

L-011-002

Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the results of additional engineering Sound Transit undertook to avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall (also called the cultural center). Access to the property and its functions has been maintained, although a small portion of land on the property's edge would be acquired for the Preferred Alternative and other at-grade alternatives. Elevated alternatives would also require a portion of the church property.

Several sections in the Final EIS have been updated to address these changes: Section 2.5.1 describes the refined alternatives for Segment A; Section 4.1 describes the acquisition impacts; Section 4.4 describes impacts to community facilities and neighborhoods; Appendix F presents revised conceptual engineering plans for the refined Segment A alternatives; Appendix I-4.1 contains detailed maps and tables concerning acquisition, displacement, and relocation requirements for each Segment A alternative; and Appendix G has visual simulations.

As noted in Section 4.1, any acquisition of property would require compensation to the property owner in accordance with Sound Transit policy and with federal and state law.

L-011-004

- o With the significant light rail construction adjacent to 5th Avenue NE between 130th Street and 145th Street, include a sidewalk and bicycle lane on the west side of 5th Avenue NE between 130th and 145th Street. The DEIS identifies a lack of adequate facilities and access, particularly during nighttime hours.

L-011-005

- **Seattle supports including the 130th Street Station in Segment A, as a station configuration constructed as shown on Alternative A5/A10 – Option 1 (page 65 of 142 of the DEIS Conceptual Plans), a retained cut, center platform station. This option does not include surface parking north of the station.** This neighborhood-oriented station expands access to the regional transit system for Seattle residents and provides a unique opportunity for bus, bike and pedestrian access to several adjacent neighborhoods and communities. Per the “Lynnwood Link Extension Station Area Transit-Oriented Development Potential” report prepared by Sound Transit and dated April 2013, the 130th Street Station ranked highest in the Station Access category of any of the stations in Segment A. Additional points below support this recommendation.
 - o Within Segment A, the 130th Street Station provides Sound Transit and King County Metro the best opportunity to provide efficient and reliable bus to rail and rail to bus connections on adjacent roadways with less traffic congestion and good connections to the relatively dense residential areas in Seattle’s Lake City and Bitter Lake neighborhoods.
 - o After the 185th Street Station, the 130th Street Station offers Sound Transit the highest ridership of the stations studied in Segment A. The ridership scenario with both a 130th Street Station and a 145th Street station indicates 3,200 average weekday riders at 130th and 2,200 average weekday riders at the 145th Street station.
 - o This 130th Street Station is supported as a bicycle hub with City-proposed cycle track facilities on 130th Street, Roosevelt Way, 125th Street, and 5th Avenue NE incorporated in the draft update of the City Bicycle Master Plan.
 - o By including both the 130th and 145th Street stations, ridership in Segment A benefits by an additional 400 daily boardings, providing increased ridership to Sound Transit from both Seattle and Shoreline.
 - o The 130th Street Station supports Sound Transit’s sustainability objectives by reducing additional SOV and bus trips to the congested Northgate Urban Hub. DEIS modeling suggests that up to 3,200 average daily trips would be captured at the 130th Street Station. Without this station, a percentage of those trips would contribute to congestion on other streets or require additional travel time on buses connecting to the Northgate Station.

The City of Seattle will continue to partner with Sound Transit on the implementation of the Lynnwood Link Extension. We look forward to working with you to expand the regional transit system and

L-011-003

The recommended action is consistent with the mitigation measures on Draft EIS page 4-91. Section 4.5.6 of the Final EIS has further details on the mitigation approach, and identifies areas where tree retention may be a possibility.

L-011-004

Sections 3.15 and 2.5 of the Final EIS identified pedestrian and bicycle improvements on 5th Avenue between NE 130th Street and NE 145th Street, and also clarify how Sound Transit would work with the City regarding other improvements during final design. The Board's Preferred Alternative includes an alignment to the east of the 117th Street bridge, which avoids the need to replace the bridge.

L-011-005

Sound Transit appreciates the summary of the benefits the City sees with a station at NE 130th Street. The Final EIS includes an option for a station at NE 130th Street.

providing safe, efficient and sustainable transportation choices for our residents and regional riders. If you have any questions about these recommendations, please don't hesitate to contact either of us or Michael James at michael.james2@seattle.gov or (206) 386-4012.

Thank you again for the opportunity to comment.

Sincerely,



Peter Hahn
Director, Department of Transportation
City of Seattle



Diane M. Sugimura
Director, Department of Planning and Development
City of Seattle

Attachment: Seattle's Lynnwood Link Detailed Comment Listing

C: Tom Hauger
Michael James

Seattle's Lynnwood Link Detailed Comment Listing
September 20, 2013

In addition to the Lynnwood Link comment letter sent jointly from Peter Hahn, Director of the Seattle Department of Transportation (SDOT) and Diane Sugimura, Director of Seattle's Department of Planning and Development; the additional comments below are generally more detailed in nature and include additional comments from city departments that wished to incorporate their specific comments collectively.

- L-011-006** | 1. To preserve existing in-city housing stock, the City of Seattle recommends that demolition of existing housing units be mitigated through production of an equivalent number of comparable housing units in the vicinity of any demolished unit. (Office of Housing)
2. The City further requests Sound Transit conduct a household income survey to determine the income levels of the households currently occupying the housing identified for demolition. This information is critical to develop a just and fair mitigation strategy for households at or below 50% of area median income. A mitigation strategy should include providing relocation expenses for low-income households and contributing to the replacement of units at or below the affordability levels of the demolished units. Contributions to the replacement of affordable housing could be in the form of direct subsidy to the production or preservation of affordable housing in the near vicinity or donation of Sound Transit surplus property for the development of affordable housing. (Office of Housing)
- L-011-007** | 3. The Department of Planning and Development acknowledges the refinements suggested in the pre-DEIS review and included in the DEIS relating to the land use map and zoning maps, comprehensive plan and other plan documents. (DPD)
- L-011-008** | 4. In section S.6.1 (Transportation) revise the last sentence to read, "...traffic management, or other strategies including bicycle, pedestrian and transit improvements." (SDOT)
- L-011-009** | 5. In section S.6.3 (Environmental Justice), impacted populations (in Seattle) would only benefit from improved access to transit if there is a station that offers access that is convenient and reliable. The 130th St. Station best provides convenient access to members of impacted populations in Seattle. (SDOT)
- L-011-010** | 6. In section S.7.1, SDOT disagrees that the 130th St. Station "would not notably increase system ridership because it would cause riders to shift from the Northgate Station." There are a few reasons for this.
- a. Ridership modeling assumed only one bus route feeding the 130th Station. By way of comparison, the 145th Station had four routes feeding it. In modeling the A10/A11 configuration (with stations at 130th and 145th), 130th had 1,000 more average weekday boardings than 145th with only one bus feeder route. With two or three buses feeding the 130th St. station, ridership would be noticeably more pronounced.

L-011-006

Sound Transit recognizes the City's concern for maintaining an adequate supply of affordable housing units within the city. Sound Transit's policy provides for a fair and equitable means of addressing real property impacts across its projects, and this includes a commitment to relocate displaced individuals in a manner consistent with state and federal law, as stated in Section 4.1. Sound Transit has successfully implemented this policy on several of the Link light rail projects developed within the City of Seattle, and which affected more properties than are potentially impacted by the Lynnwood Link Extension. While Sound Transit will endeavor to relocate displaced parties in the same neighborhood or area, the work is done in consultation with the displaced parties, who may or may not choose to stay in the same area. They will, however, be placed in housing that is affordable to them; this effort includes interviews with the affected parties to help determine affordability, as well as compensation and assistance programs that meet individualized needs and ensures safe and sanitary dwellings. Sound Transit generally does not enter into negotiations with affected parties until after the completion of the NEPA/SEPA process. Sound Transit may consider opportunities for making surplus property available for redevelopment, but this would not be considered as mitigation for displacements, which would be fully mitigated through the existing policy commitment defined in Section 4.1 of the Final EIS and compliance with state and federal requirements.

L-011-007

Sound Transit appreciated the City's review and suggestions leading up to the Draft EIS.

L-011-008

Sound Transit has revised the sentence generally as suggested for the Final EIS.

Seattle's Lynnwood Link Detailed Comment Listing
September 20, 2013

- L-011-010** | b. Metro and the DEIS have indicated that bus routes can be adjusted to better feed stations, increasing regional ridership and efficiency.
- c. This assumes the same number of regional riders would endure congested drives or riding bus routes travelling into the much more congested Northgate Urban Hub as would bus, bike, walk or kiss and ride a shorter distance to a neighborhood station at 130th.
- d. Regional rail modeling does a good job of capturing walk access, but it does not do an accurate job of capturing bicycle access to stations. With the proposed bicycle improvements in the 130th station area, we believe this market is being under reported for model year 2035.
- e. This point is contrary to information in the Transportation Technical Report, page 5-9 (see comment 13 below).
7. Table 4-18 in the Transportation Technical Report supports routing more buses along 130th and 125th Streets to a station rather than along 145th Street based upon the reported Daily Traffic Volume and available lanes. (SDOT)
- L-011-011** | 8. In section 4.5.1 of the Transportation Technical Report, SDOT concurs with the assessment of the lack of ADA sidewalks on the west side of 5th Avenue NE between NE 130th and NE145th and recommends installing ADA compliant curbs and sidewalks with the reconstruction of the street and freeway frontage.
- L-011-012** | 9. Section 4.5.2 (Bicycle Facilities) of the Transportation Technical Report - In the FEIS, SDOT recommends inventorying all arterials within 3 (not 1) miles of each station. This is in alignment with new direction from the FTA relating to eligible bicycle infrastructure funding.
- L-011-013** | 10. Table 4-34 in the Transportation Technical Report supports reconfiguring the NE 130th Street northbound off-ramp to 5th Avenue NE to improve safety as proposed in alignment A1.
- L-011-014** | 11. Section 5.2 in the Transportation Technical Report supports the recommendation for Sound Transit to work closely with King County Metro and SDOT to develop an efficient bus restructure capitalizing on the opportunities of the 130th St. Station. (SDOT)
- L-011-015** | 12. Table 5-8 in the Transportation Technical Report – SDOT disagrees with the assumptions in the assumed feeder bus service to light rail stations. In the preparation of the FEIS, work closely with SDOT and King County Metro to develop an updated feeder network to ensure the most efficient routing and understanding of bus facilities such as stops and speed and reliability improvements that can be coordinated with Seattle and Metro.

L-011-009

Sound Transit notes your comment. Thank you.

L-011-010

The conceptual service plans used for the Draft EIS analysis was based on assumptions developed in coordination with the transit service providers. Sound Transit has updated its ridership forecasts for all alternatives in the Final EIS to incorporate updated land use forecasts, although changes to the assumed service plan have been limited. This includes updated forecasts for the NE 103th Street Station, which is an option for the Preferred Alternative. While it is accurate that the regional rail transit model does not specify bicycle access shares, the modeling inherently includes all riders across modes. While this may slightly overstate the shares of the other access modes by not separating out bicycles, it is appropriate for the purposes of an EIS analysis and the conceptual level design efforts being conducted at this stage of the project.

L-011-011

Sound Transit will meet ADA standards for any facility that it constructs or modifies, and will work with the City of Seattle during final design to confirm the specific design approach for features such as sidewalks and curbs.

L-011-012

While Federal Register Vol 76, No. 161 identifies a bicycle catchment area of 3 miles to identify streets with a de facto physical and functional relationship to transit, and therefore eligible for FTA funding, it does not require high capacity transit projects to analyze the full area in an EIS or incorporate improvements covering that area. Pedestrian and bicycle facilities developed as part of the project, as well as other access features at Lynnwood Link Extension stations, will be developed

Seattle's Lynnwood Link Detailed Comment Listing
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- L-011-016** | 13. Page 5-9, third bullet, in the Transportation Technical Report, is contrary to Section S.7.1 (discussed in comment 6 above). "Adding a third Segment A station would result in a net increase of 400 daily boardings in the segment because it would provide more access points to the transit market." Revise the summary language per this information. (SDOT)
- L-011-017** | 14. Section 5.2.2. in the Transportation Technical Report, supports comment 12 (above), specifically, "Near the NE 145th Street Station, the impact of additional traffic associated with that station would contribute to already congested conditions (LOS E-F), which could impair the ability of local bus service to provide reliable access to the station." (SDOT)
- L-011-018** | 15. Section 5.2.2., page 5-32 in the Transportation Technical Report – for alternatives A5 and A10, write out the alternatives specific to the correct streets, do not say that impacts would be the same as another alternative on a different street. (SDOT)
- L-011-019** | 16. Section 5.5.1. in the Transportation Technical Report – Explain how bicycle trips and bicycle facilities influence this evaluation. Explain how bicycle trips are factored in Table 5-31. If not explained in this section, identify how and where they are considered for trip generation. (SDOT)
17. Page 5-96 of the Transportation Technical Report; clarify if the planned Jackson Park Perimeter Trail would meet any ADA requirements for a trail, sidewalk or shared use path. (SDOT)
- L-011-020** | 18. The Transportation Technical Report, page 5-123 states, "If a station is selected for NE 145th Street, the station design and design of adjacent streets would need to address the current and expected increase in conflicts between vehicles and between travel modes near the station, as reflected in the existing High Accident Locations (HALs)." Define the alternatives for mitigating impacts. Is reduction of at station parking an alternative to reduce congestion impacts? (SDOT)
- L-011-021** | 19. SDOT recommends the following refinements and/or revisions to sheet 65 of the DEIS Conceptual Plans:
- a. Expand the pedestrian plaza at the northwest corner of NE 130th St and 5th Avenue NE to accommodate a bus shelter/weather protection
 - b. Design to the station and bus drop off to accommodate multiple routes and stop locations. For the FEIS, discuss alternative bus feeder alternatives and facility needs based upon meetings with King County Metro and SDOT.
 - c. Include 8 kiss-and-ride drop off spaces

consistent with the Board-adopted System Access Policy (Resolution R2013-03), which provides criteria to be used in defining access features throughout the system. Many of these elements will be further defined during final design and permitting, as Sound Transit continues to coordinate with local agencies to determine station access features and to seek further opportunities to partner with the other agencies to maximize the benefits of this major transit investment.

L-011-013

An option with the reconfigured NE 130th Street northbound off-ramp is part of the Preferred Alternative for Segment A. As stated in Section 3.2.8 of the Final EIS and Section 5.8 of the Transportation Technical Report, this improvement is likely to improve safety at this location.

L-011-014

As noted in Chapter 3, Section 3.2.2 of the Final EIS, Sound Transit would coordinate with King County Metro and Community Transit on potential local bus service modifications as the project enters final planning leading to operation. However, the changes in services would be made by the local transit agencies, who have their own policies and processes for considering service revisions.

L-011-015

The assumptions used for the Draft EIS were developed in coordination with King County Metro and were intended to help develop ridership forecasts for each station. These draft transit integration plans were not intended to fully define the range of transit improvements that King County Metro or others might undertake in connecting corridors. Consistent with the approaches used for other projects that Sound Transit has implemented, including the light rail lines in place or in development in the city, this detailed integration planning would occur after the Final EIS is complete and the project is in preparation for

Seattle's Lynnwood Link Detailed Comment Listing

September 20, 2013

- L-011-021** | d. Design multiple drop off parking spaces that do not require all trips to use 5th Avenue NE (locations may require use of existing signalized pedestrian crossings)
- L-011-022** | 20. Suggest including an assessment of public places that are enhanced by light rail station access. A criteria that documents well established neighborhoods is also recommended. This should be a part of the transit supportive plan and policy documentation. (SDOT)
- L-011-023** | 21. With construction impacting I-5, 1st Avenue NE, 5th Avenue NE, Roosevelt Way NE and NE 130th Street, protect and enhance drainage, including waters that may influence the Thornton Creek water course. (SPU)
22. Coordinate future design efforts impacting drainage, such as new curb, gutter and sidewalks with Seattle Public Utilities (SPU) and SDOT. (SPU)

operations. King County Metro has revised its service integration concepts for a 130th Street Station for the Final EIS to include additional service, and the results of those changes are reflected in the Final EIS forecasts and updated station design.

L-011-016

The summary text has been updated for the Final EIS.

L-011-017

For the Preferred Alternative, the Final EIS incorporates improvements to help minimize potential travel delays that could affect local bus service to the station. The other alternatives identify these potential improvements as mitigation.

L-011-018

Sound Transit has updated the Transportation Technical Report, and has revised text to clarify the locations identified in the comment.

L-011-019

Bicycle trips were not factored into the pedestrian LOS analysis, because detailed bicycle access projections were not available or necessary to support project planning at this stage of the project. While the Sound Transit model does not address bicycle access shares, the modeling inherently includes all riders. Pedestrians walking between rail and their parked bicycles are reflected in the overall numbers contained in Table 5-31 of the Transportation Technical Report.

Sound Transit is not proposing an alteration to the Jackson Park Perimeter Trail.

L-011-020

The Final EIS Chapter 3, Transportation, and the Transportation

Technical Report and Chapter 3 of the Final EIS have the results of an updated analysis of the NE 145th Street Station area using microsimulation software. The Preferred Alternative incorporates design measures for local street improvements that would address the added traffic related to the station and park-and-ride, and improved signalization and an added signalized intersection at the I-5 ramps also helps address a known accident location. The simulation software evaluates the effectiveness of transportation improvements incorporated within the design for the Preferred Alternative, as well as for other mitigation measures described in the Final EIS. The Final EIS also has additional language in mitigation explaining how Sound Transit will work with local agencies during final design to develop and implement mitigation details.

L-011-021

Sound Transit will refine details such as the plaza size, weather protection at the station and bus platforms, and further detail on bus transit service assumptions and requirements following the Final EIS, if this station is included as part of the project.

L-011-022

Section 4.4 and Appendix C now include a list of public places that would be near each station. Neighborhoods served are also described in Section 4.4, although Sound Transit did not attempt to characterize neighborhoods in qualitative terms. Many of the Draft EIS public comments served to inform the Sound Transit Board of how members of those neighborhoods perceived the project as either benefiting or impacting their communities. The Transit Oriented Development Assessment conducted for the project is not part of the EIS but was updated as part of other documentation for the project to reflect the Preferred Alternative.

L-011-023

As described in Section 4.9.6 of the Draft EIS, the project would comply with all federal, state, and local regulations protecting water quality. Approaches will include project planning, design, and the application of Best Management Practices (BMPs). Sound Transit will coordinate with Seattle Public Utilities regarding future design efforts for drainage where applicable.



David E. Moran, Chief Executive Officer

September 23, 2013

Sound Transit, Draft EIS Comments
C/o Ms. Lauren Swift
401 S. Jackson St
Seattle, WA 98104

Dear Ms. Swift:

- L-012-001** | Community Transit strongly supports the Lynnwood Link Extension (Link). Once opened, it will significantly increase mobility options for Snohomish County residents by providing fast, frequent, and reliable service between Snohomish County and the greater Puget Sound Region. Community Transit will do our best to effectively serve Link stations in Snohomish County. Our comments in the current environmental review process focus on mitigation to preserve mobility during construction and system design elements that will enable effective bus-rail integration.
- L-012-002** | Surveys suggest 40 percent of all Snohomish County residents commuting to jobs in downtown Seattle use transit via Interstate-5 (I-5). Link construction impacts on general purpose traffic will further increase transit demand. Protection of this transit market needs to be a top priority in construction mitigation. Today's regional bus riders are the basis for the future light rail market.

Mitigation should provide service equal to or better than what is provided today. I-5 is already congested, in both general purpose and HOV lanes, impacting speed and reliability of transit. Where I-5 lane closures are called for, these should occur on nights and weekends when demand is reduced. Where HOV lane or direct access ramp impacts are unavoidable, an alternative priority path for transit should be implemented. Accommodating higher transit demand during construction will likely require mitigation in the form of funding for additional buses and service hours, as well as transportation demand management (TDM) strategies. With effective mitigation, transit demand will continue to grow, providing a strong, healthy market at the opening of Link light rail service to Snohomish County in 2023.
- L-012-003** | It is understood that most users of Link will access the system via walk or bus. The final system design should prioritize effective integration with the bus network, safe, convenient pedestrian access and potential for transit oriented development (TOD). The number and location of stations, should meet Sound Transit's Long Range Plan vision to provide reliable, rapid, and efficient service to meet the existing and projected demand for regional travel within the corridor and to other urban centers in the central Puget Sound. With this framework in mind, Community Transit's main input on design includes:
- L-012-004** |
 - Prefer Lynnwood Transit Center alternative C1, along 200th St SW, which provides effective pedestrian access, transit integration and TOD potential.
- L-012-005** |
 - Concern with Lynnwood Transit Center alternative C3 Option 1 (along I-5), which would be difficult for transit to serve, has poor pedestrian access and little TOD potential.
 - Concern with Lynnwood Transit Center alternative C3 Option 2. It provides better transit integration, but still has long walks for pedestrians and little TOD potential.

1100 Henderson Rd. Everett, WA 98203-5834 | ph (425) 348-7100 | fx (425) 348-2319 | TTY Relay: 711 | www.communitytransit.org

L-012-001

Thank you for your comment stating support for the Lynnwood Link Extension and for Community Transit's intent to effectively serve Link stations in Snohomish County.

L-012-002

Sound Transit recognizes the need to support and maintain transit markets during construction. However, the project does not anticipate that impacts to I-5 will occur throughout the construction period, and many of these impacts would be reduced by working closely with WSDOT, FHWA and the transit agencies operating along the corridor to develop a coordinated plan to maintain mobility during the shorter periods when traffic would be affected by construction affecting the freeway itself. This is consistent with the construction approach (Section 3.3) and the mitigation measures (Section 3.6) described in the Final EIS. Section 3.6 identifies potential mitigation to be developed with its partners, including service increases, service modifications, or temporary service improvements. The Final EIS also provides more definition of the location and duration of closures and their related impacts, as well as minimization measures such as timing closures to be in off-peak periods, evenings, or weekends where possible.

L-012-003

Comment noted. Sound Transit agrees with these observations.

L-012-004

Thank you for your comment stating a preference for Alternative C1.

L-012-005

The Final EIS includes a modified Alternative C3 as part of the Preferred Alternative. The modifications help address the access and TOD development issues that this comment raises.

L-012-006

- Note that the 220th Street SW station (B2A) is not a focus of existing or planned bus service, unlike the nearby hubs at both Lynnwood Transit Center and Mountlake Terrace Transit Center.

L-012-007

- Prefer the Mountlake Terrace elevated station crossing over NE 236th (B1, B2), which provides the best pedestrian access, transit integration and TOD potential.

L-012-008

- Concern with Mountlake Terrace alternative B4 (Freeway Station), which has compromised market potential and construction impacts that would be very costly to mitigate

L-012-009

- Note that the assumption of *Swift* BRT service to the 185th St Station requires transit priority infrastructure along NE 185th between Aurora Avenue and I-5 to ensure speed and reliability

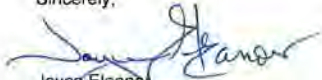
Our detailed comments on construction impacts and system design are attached to this letter.

L-012-010

As stated above, Community Transit is a strong supporter of this light rail extension to Snohomish County. We appreciate the opportunity to comment on the DEIS and are hopeful that Sound Transit will be visionary in their selection of design alternatives that provide the most effective integrated transit system for the future mobility of the Puget Sound region.

We also look forward to coordinating with Sound Transit as they identify funding and strategies to mitigate impacts to existing transit markets during construction of Link.

Sincerely,



Joyce Eleanor
Chief Executive Officer

kegt

Enclosure

cc: Community Transit Board of Directors
Community Transit Corridor Working Group

L-012-006

Sound Transit recognizes that the 220 Street SW Station is not the focus of Community Transit's existing or planned transit service, but the presence of a station at that location has been suggested by local jurisdictions and others because the arterial is a major corridor serving Edmonds and other communities. The Preferred Alternative includes an option for a station at that location, and its benefits would be higher with connecting transit service.

L-012-007

Thank you for your comment stating a preference for the elevated station featured in Alternatives B1 and B2.

L-012-008

Comment noted. Your observation of the transit impacts during construction for the freeway station being difficult or expensive to mitigate are consistent with the Draft EIS findings, although mitigation options would be available.

L-012-009

Although Sound Transit agrees that transit priority treatments might benefit a Swift extension from Aurora Village Transit Center to NE 185th Street Station, Sound Transit has not included the improvements as part of the Lynnwood Link Extension. Sound Transit supports transit improvements that would serve the station, and will continue to work with Community Transit, as stated in Section 3.2.2 of the Draft EIS.

L-012-010

Thank you for your comments and collaboration on the Lynnwood Link Extension.

**Community Transit Comment Detail:
Sound Transit - Lynnwood Link Extension DEIS**

Segment A (Seattle to Shoreline)

L-012-011 Station Alternatives:
If it is decided that Community Transit's *Swift* bus rapid transit (BRT) system is the appropriate fixed-route bus service to feed the 185th Street Station in Shoreline, BRT infrastructure needs to be provided. BRT infrastructure can include high occupancy vehicle (HOV) or Business and Transit (BAT) lanes, signal priority, and intersection improvements, such as queue jumps to maintain speed and reliability along NE 185th Street between the Link station and Highway 99.

L-012-012 Construction Impacts:
I-5 lane closures are possible within Segment A if Alternatives A1, A5, or A10 are chosen: one-lane in each direction on I-5 could be closed for up to 2 months. The possible 24-hour I-5 lane closures would occur at NE 117th Street, NE 185th Street, and NE 130th Street. The NE 130th Street northbound off-ramp might also be closed. I-5 lane closures would further increase congestion and delay. As noted in our letter, construction mitigation needs to provide transit with an ongoing priority path in this corridor.

Segment B (Shoreline to Mountlake Terrace)

L-012-013 Station Alternatives:
Alternatives B-1 and B-2 (elevated station crossing 236th St SW): Community Transit prefers these alternatives because the proposed station location provides for efficient transfers between Link light rail and fixed-route bus service. It has the greatest potential for transit oriented development (TOD) to occur around the facility, and provides for good pedestrian connectivity between the station, Mountlake Terrace Town Center, and the Freeway/Tourism sub-area just south of 236th St SW.

L-012-014 Alternative B-2A (station at 220th St SW): Community Transit's future network plans do not anticipate significantly increased bus service along 220th St SW. A station at this location is assumed to be primarily the focus of pedestrian access limited to the immediate vicinity.

L-012-015 Alternative B-4 (freeway station): Community Transit does not support this alternative because of the separation between the proposed Link station and fixed-route bus service, increasing the already long walk between the transit loop off 236th St. SW and the Freeway Station. The DEIS states this location will result in the loss 1,000 daily boardings. It has the least amount of potential to spur future TOD development and it would eliminate any future use of the existing freeway station for fixed-route bus service.

L-012-016 Construction Impacts:
I-5 lane closures within Segment B are possible for all proposed rail and station location alternatives during the construction activities to install support structures in the median, including the reconstruction of the NE 195th Street pedestrian/bike overcrossing, and reconstruction of 236th Street SW adjacent to the new station. As stated above, any short or long-term lane closures on I-5 will increase congestion causing additional delay. Construction of the elevated guideways could also impact signal operations on 236th Street SW. This could also add delay for vehicles, including buses, accessing I-5 to and from the Transit Center.

Community Transit – Lynnwood Link DEIS Attachments
September 23, 2013

1

L-012-011

As the project progresses into final design, Sound Transit will continue to coordinate with Community Transit and the City to encourage *Swift* service from Aurora Village to the NE 185th Street light rail station. However, the Lynnwood Link Extension project does not include specific transit priority or BRT improvements between the corridors leading to the station.

L-012-012

Please see Sections 3.3 and 3.6.9 of the Final EIS for further detail on the project's potential construction activities, impacts, and the mitigation plan for construction, including the mitigation approach for transit. While the emphasis is on the Preferred Alternative for each section, a similar mitigation approach would apply to other alternatives. However, it is important to note that these are assumptions on construction approach for the purposes of an EIS analysis of potential impacts and mitigation. The level of impacts, including their duration, depends on issues that will be further developed during final design, subject to FHWA and WSDOT approval, and also influenced by a contractor's approach to construction. The mitigation in Section 3.6.9 therefore emphasizes detailed coordination with the transit agencies and WSDOT as mitigation details are further refined.

L-012-013

Thank you for your comment.

L-012-014

The project would not begin service until 2023. Sound Transit recognizes this is within the period covered by Community Transit's Long Range Plan (2030). However, as outlined in Community Transit's Long Range Plan: *Thinking Transit First* (pages 23-24), Community Transit plans to serve productive route segments to local activity

L-012-016 The greatest impacts to transit will occur if the direct access ramps to the Mountlake Terrace Freeway Station are closed as proposed with Alternative B-1 (for up to 2 months) and B-2/B-2A (for between 2 and 12 months). Alternative B-4 would permanently close the Mountlake Terrace Freeway station at the beginning of construction. Such closures would have a significant impact on transit, requiring reroutes through the City of Mountlake Terrace, causing significant increases in travel time, requiring temporary bus stops, and further compounding the traffic delays that would be caused by lane closures on I-5.

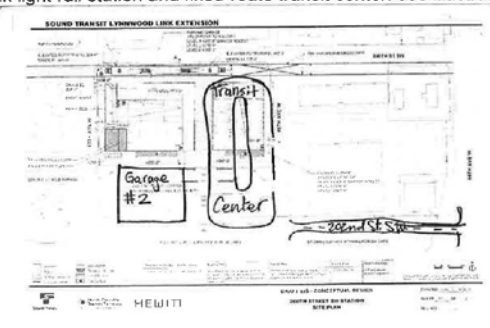
It is imperative that transit service between Snohomish County and King County be protected during construction. Therefore, mitigation is required to maintain and/or improve the existing service levels during the construction phase of the Lynnwood Link Extension project. As stated earlier, transit demand is anticipated to increase as additional congestion negatively impacts general purpose travel lanes on I-5.

Mitigation required for Community Transit to maintain existing inter-county transit service for the construction of the Lynnwood Link Extension includes, but is not limited to, financial assistance for operating and capital expenses to increase service and/or provide reroutes as suggested as a construction mitigation strategy in the DEIS, maintain ingress and egress to the Mountlake Terrace parking garage, maintain ingress and egress to the Mountlake Terrace Freeway Station, use the late night I-5 lane closures option instead of 24-hour lane closures, maintain or improve HOV lane operations, and deployment of a very proactive TDM program.

Segment C (Mountlake Terrace to Lynnwood)

L-012-017 Station Alternatives:
Alternatives C-1: With modifications, this is Community Transit preferred station location because it provides for efficient transfers between Link light rail and fixed-route bus service. It has the greatest potential for transit oriented development (TOD) to occur around the facility, further building the transit market and it provides the best pedestrian connections of all there alternatives between the facility, the 196th Street Corridor and Lynnwood's City Center.

- The following modifications are suggested:
- Flip the east parking garage with the transit center to further reduce the distance to transfer between the Link light rail station and fixed-route transit center: see illustration below.



centers with an emphasis on transit centers and Link light rail stations. The plan also states that the local routes will be designed to coordinate with higher level of services, especially regional commuter express routes, Swift corridors, commuter rail, or light rail routes. The Long Range Plan specifically identifies 220th Street SW as a facility that provides a critical local link.

As stated in Section 3.2.2 of the Final EIS, Sound Transit anticipates partnering with Community Transit to consider local or regional service revisions integrated with light rail service for development as part of the Lynnwood Link Extension.

L-012-015
Sound Transit acknowledges Community Transit's concerns with Alternative B4, which include lower TOD potential, longer walks, and lower ridership.

L-012-016
Please see response to comment L-012-002.

L-012-017
Thank you for your comment stating a preference for Alternative C1 and providing reasons and proposed modifications for this alternative.

L-012-017

- Provide covered pedestrian pathways between Link, the parking garages, and the transit center.
- Provide an elevated and covered pedestrian bridge from the Link Station to the north side of 200th Street SW.
- Widen 200th Street SW to accommodate the additional traffic resulting from the construction of the Lynnwood Link Extension and additional parking garages, in addition to the transit center.
- Designate 46th Avenue W, south of 200th Street SW, HOV only.
- Open 202nd Street SW between 44th Avenue W and 46th Avenue W to create a secondary access point to the facilities at Lynnwood Transit Center.
- Retain or relocate Community Transit's Ride Store in close proximity to the transit center.

L-012-018

Alternative C-2: Community Transit could also support this alternative, with modifications. This location would still provide for a convenient transfer point between Link light rail and the fixed-route transit center. TOD opportunities are still available. However, the pedestrian connectivity is not as good as that provided the 200th Street SW location for pedestrians destined for businesses along the 196th Street Corridor and within City Center.

The modifications requested for consideration are:

- Retain Community Transit's Ride Store at its current location, in close proximity to the transit center.
- Provide covered pedestrian bridges between the Link station, transit center, and parking garage.
- Designate 46th Avenue W, south of 200th Street SW, HOV only.
- Open 202nd Street SW between 44th Avenue W and 46th Avenue W to create a secondary access point to the facilities at Lynnwood Transit Center.

L-012-019

Alternative C-3 Option1: Community Transit does not support this alternative because of the significant separation between the proposed Link station and fixed-route bus service. It has the least amount of potential to spur future TOD development that will increase the transit market and it has the worst pedestrian connections between the Link station, transit Center, parking garage and commercial developments along the 196th Street Corridor and City Center of all the alternatives.

L-012-020

Alternative C-3 Option 2: Community Transit has concerns with this alternative. Although it improves the transfer point between Link light rail and fixed-bus transit service, the remaining issues identified with Alternative C-3 Option 1 remain. Additionally, the relocated transit center would increase travel running times for buses serving the facility and increase operating costs.

L-012-021

Construction Impacts:

Mitigation required for Community Transit to maintain existing inter-county transit service for the construction of the Lynnwood Link Extension includes, but is not limited to, financial assistance for operating and capital expenses to increase service. The rest of the construction impacts are directly related to the station location for Lynnwood Transit Center.

L-012-022

Alternative C-1, with the modifications suggested by Community Transit, would require a temporary transit center while the facility is being constructed. This could occur in the existing park and ride facility. It would further reduce the number of parking stalls available. TDM measures and increase in local feeder service could mitigate these additional impacts.

L-012-018

Thank you for your comment stating support for Alternative C2 and providing reasons and proposed modifications for this alternative.

L-012-019

Community Transit's concerns with Alternative C3 Option 1 are noted. Please see response to comment L-012-005.

L-012-020

Community Transit's concerns with Alternative C3 Option 2 are noted; the range of alternatives in Lynnwood was developed to explore the differences that variations in sites and layouts might offer in terms of transportation performance, costs, and environmental impacts. The distance between the existing transit center and the new site is relatively small.

L-012-021

As described in Section 3.6.9 of the Final EIS, any plans involving transit service modifications would be coordinated with King County Metro, Community Transit, and private transit service providers to minimize construction impacts and disruptions to bus facilities and service.

Please see response to comment L-012-002 for a discussion of construction impacts and mitigation.

L-012-022

Sound Transit appreciates the suggestions for Alternative C1, but the transit center would not need to be closed during construction. The other detailed suggestions for facilities and amenities involve design definitions that would be determined at later stages of the project, and Sound Transit would involve Community Transit and others to participate in the development of such designs regardless of the alternative

L-012-023 | Alternative C-2, with the modifications suggested by Community Transit, does not appear to impact transit operations in the area. However, if TDM were used to mitigate the reduction in parking available, funding would be needed to increase service.

L-012-024 | Alternative C-3, Options 1 and 2, do not appear to impact Community Transit operations in and out of the Lynnwood Transit Center. As stated above, funding would be needed to provide additional local feeder service, as a mitigation measure for the loss of 560 parking stalls.

Additional Comments and Mitigation Suggestions

In addition to the specific comments provided above, Community Transit is providing the following general comments for future design consideration and additional mitigation measures.

L-012-025 | • Where elevated tracks are constructed over local roads, a minimum height clearance of sixteen feet would be required to accommodate the Double Tall buses. This would allow maximum flexibility for Community Transit when developing future service in south Snohomish County.

L-012-026 | • There are additional highway projects that would significantly enhance the transportation system, during and after the completion of the Link light rail extension to Lynnwood:

- Direct access between the NB I-5 HOV lanes and SB Interstate 405 (I-405) HOV lanes
- Direct access between NB I-405 HOV lanes and the SB I-5 HOV lanes
- Direct access between SB State Route (SR) 525 and the SB I-5 HOV lanes
- Direct access between the NB I-5 HOV lanes and NB SR 525

By providing direct access points between the HOV lanes of different freeway systems, the potential for accidents would be reduced and traffic flow improved by eliminating the need for HOVs to cross into general purpose lanes to access the connecting route. These improved connections would also reduce travel times and the cost to provide bus service. The SR-525 to I-5 SB connection would enable Community Transit to remain on the freeway system, thus providing improved service between Mukilteo and destinations in King County.

L-012-027 | • Sound Transit is encouraged to work with the Washington State Department of Transportation (WSDOT) to adjust the carpool policy from 2+ to 3+ as a construction mitigation measure.

selected. It is correct that any of the alternatives involving construction on existing park-and-ride facilities would reduce the available parking supply, and that transit and TDM measures could help address the impact.

Please see response to comment L-012-002 for a discussion of construction impacts and mitigation.

L-012-023

Sound Transit appreciates the suggestions for Alternative C2. As described in the previous response (L-012-022), such details will be determined later in the project by Sound Transit in collaboration with Community Transit and others.

L-012-024

The Final EIS Chapter 3, Section 3.6.9., includes further discussion of mitigation options for the loss of parking stalls during construction. Improvements in transit service are among the options identified.

L-012-025

Sound Transit's existing design standard for placing guideways over any roadway is a minimum 16.5-foot vertical clearance.

L-012-026

Sound Transit agrees that there are a number of other projects, including HOV direct access improvements, that could complement the Lynnwood Link Extension and address other transportation needs and problems. However, they are beyond the scope of the project being studied in the EIS.

L-012-027

Changes to the carpool policy from 2+ to 3+ will be discussed with

Community Transit Comment Detail:
Lynnwood Link Extension Transportation Technical Report

- L-012-028** | 1. Pages 4-25 through 4-36, Section 4.2.2 (Regional Transit): it is not clear if LOS analysis is for Sound Transit only or includes all agencies. The information provided for transit frequency, hours of service, and passenger load read as if the analysis includes Community Transit, King County Metro, and Sound Transit; whereas, the data for reliability and on-time Performance only includes Sound Transit data.
- L-012-029** | 2. Page 5-31, Local and Sub-Regional Bus Transit: thank you for including the last sentence for the NE 185th Street Station regarding transit priority treatments along NE 185th Street for *Swift* BRT service to the station.
3. Page 5-33: Community Transit concurs with the continued use of the Mountlake Terrace Freeway flyer station for Alternative B-1, B-2, and B-2A, as a connection point between bus transit and Link light rail service.
- L-012-030** | 4. Page 6-1, Construction Impacts: the third bullet states the at-grade rail alignments and bridge reconstruction proposed with Alternatives A1, A5, and A10 could require lane closures on I-5, one in each direction, for up to one month.
- Any lane closures that increase traffic volumes on I-5 have a negative impact on transit operations, and must be mitigated. The existing transit riders making use of current inter-county bus service are future Lynnwood Link customers. This existing market needs to be protected during the construction of Link. It is also likely that demand for transit service will increase as I-5 conditions deteriorate in the general purpose lanes.
- To minimize these impacts, I-5 lane closures should be limited to late night and weekends, the HOV lanes should be increased from 2+ to 3+ passengers per vehicle to maintain speed and reliability for the existing inter-county bus service.
5. Page 6-1, Construction Impacts: the fourth bullet states elevated alignments will require night time closures. This should not impact Community Transit operations, but could impact Sound Transit's 500 series Express bus service between Snohomish and King Counties.
6. Page 6-1: the sixth bullet states Alternatives B1 and B2/A require construction in the median on I-5, adjacent to the transit center: construction activity will require the direct access ramps and freeway flyer station to close for 1 to 2 months.
- Sound Transit needs to work with WSDOT to find an alternative to closing the Mountlake Freeway Station: any closure of this facility will have significant negative impacts on Community Transit Commuter and Sound Transit Express Bus service. The most significant impact is, but not limited to, major reroutes for the existing eight commuter/express buses that stop at this facility. These reroutes will impact travel time, which will add to the operating and, possibly, capital costs to provide this service between Snohomish and King Counties during the construction phase of the Lynnwood Link Extension.
7. Page 6-1: the last bullet states construction of the light rail station will reduce the number of park & ride stalls. Mitigation could include TDM measures to encourage drivers to use local

5

Community Transit – Lynnwood Link DEIS Attachments
September 23, 2013

WSDOT as the mitigation program continues to be developed and refined during final design. This measure could also be an element of the construction traffic management strategy for I-5 lane closures.

L-012-028

Section 3.2.2 of the Final EIS has been updated to clarify that the LOS analysis for transit frequency and hours of service included Sound Transit, King County Metro and Community Transit services, and that the reliability and on-time performance data are primarily from Sound Transit.

L-012-029

Thank you for your comment.

L-012-030

Please see response to comment L-012-002 for a discussion of construction impacts and mitigation.

transit options to access the Lynnwood Transit Center during construction; however, no specifics are provided for the TDM strategies. One suggestion is partnering with Community Transit to increase the coverage of the Curb the Congestion program. Additionally, if Community Transit is the provider of the "local transit option," financial assistance will be needed for operating and capital costs to provide such service.

8. Page 6-10, Segment A, General Purpose Traffic Impacts: confirms impacts to transit with I-5 lane closures for between 1 – 2 months as a result of bridge replacements. Same concern as stated above for item #4. Community Transit would prefer construction requiring I-5 lane closures to occur during late night hours and/or on weekends. If this is not possible, the same mitigation measures should be considered.
9. Page 6-10, Transit Impacts: there will also be negative impacts to Sound Transit Express Bus Route 512, which needs to cross from the left HOV lanes and to the NE 145th St. Freeway Flyer stop: if one-lane general purpose I-5 lane is closed in each direction, this movement will be more difficult affecting service speed and reliability.
10. Page 6-13, Transit Impacts: the narrative should include negative impacts to Community Transit's 400 and 800 series commute service and Sound Transit's 500 series Express Bus service, if the I-5 lane closures are on a 24-hour basis, as opposed to the late night closures. See comments for #4 and #9.
11. Page 6-14, Transit Impacts: see response for comment #10.
12. Page 6-15, General Purpose Traffic Impacts: if possible, Community Transit would prefer the late night and weekend I-5 lane closures as opposed to 24-hour lane closures. Otherwise comment #4 applies.
13. Page 6-15, Transit Impacts: should repeat the General Purpose Traffic Impacts relating to the I-5 closures. See response for comment #4. Again, Community Transit would prefer night time closures that do not disrupt I-5 during weekday AM and PM peak period commutes.
14. Page 6-22, Segment B, Transit Impacts (top of page): see comment #4 regarding I-5 lane closures. Additionally, see comment # 6 relating to the Mountlake Terrace Freeway Station.
15. Page 6-22, Alternative B-1, Transit Impacts (bottom of page): same comment as above #6.

Reroutes for buses coming from the north to MLT and heading north after stopping at MLT from/to I-5 will have to exit/enter I-5 at 220th Street SW because there are no direct I-5 on or off-ramps on the north side of 236th St SW to the Mountlake Terrace Park and Ride. This will not only inconvenience riders, but increase the cost to provide the service for both Community Transit and Sound Transit. Both agencies may also have to work with the City of Mountlake Terrace to find an alternative bus stop to reduce the total time delay with the inability to use the freeway station.

Additionally, the second paragraph states bus circulation may be constrained, but not restricting during Alternative B1 construction. Again, any change to stops, reroutes, or other operational changes will have negative impacts to current transit riders, by moving bus

L-012-030

stops, increase in travel time, possible decreases in reliability, and most likely increased costs to provide comparable service.

16. Page 6-23, Alternative B2, Transit Impacts: same comments as #6 relating to the Freeway Station. Additionally, the 1 month closure of 228th St SW will impact at least two Community Transit local bus routes that cross I-5 via the 228th/230th Street SW bridge. This will require significant reroutes because there are limited alternatives for crossing over I-5. Community Transit requests mitigation for this impact.
17. Page 6-24, Alternative B2A: Impacts to transit should be further described beyond, "during construction, transit would experience some delay and bus stops could be temporarily relocated."
18. Page 6-24, Alt 4, Transit Impacts: see comment #6.
19. Pages 6-25 and 6-26, Alt. C-1, Transit Impacts: increase in traffic congestion along 200th Street SW will negatively impact transit operations in and round the Lynnwood Transit Center: increase in delay, decrease in reliability, etc. Community Transit requests mitigation needed to compensate for these impacts to local service, which is also recommended as a mitigation measure for the loss of parking stalls at Lynnwood Transit Center during construction. Mitigation for the loss of parking stalls could also include coordination with Community Transit to enhance the existing Curb the Congestion TDM program.
20. Page 6-27, Alt C-3, Transit Impacts: thank you for minimizing transit impacts by limiting the 46th Avenue W I-5 direct access ramp closures to late nights and weekend. Sound Transit routes will be still be impacted by weekend closures.
21. Page 9-10 Construction Mitigation, Transit: Community Transit requests financial mitigation to provide additional in service, needed to off-set impacts resulting from the construction of the Lynnwood Link Extension to the Lynnwood Transit Center.
22. Page 9-10 Construction Mitigation, Transit: there is no mention of mitigation for the negative impacts to transit resulting from I-5 lane closures. This impacts all agencies currently providing service on I-5 corridor within the project area.
23. Page 9-11, 4th bullet: all communications regarding parking and transit service should be coordinated with Community Transit and King County Metro.

L-012-031

L-012-031

As described in Section 3.6.9 of the Final EIS, transit service modifications would be coordinated with King County Metro, Community Transit, and private transit service providers to minimize construction impacts and disruptions to bus facilities and service.

Swift, Lauren

From: Roland Behee <Roland.Behee@commtrans.org>
Sent: Tuesday, September 24, 2013 4:52 PM
To: Lynnwood Link DEIS
Cc: Carol Thompson; June DeVoll; Kate Tourtellot; Wade Mahala; Joy Munkers
Subject: Community Transit - Station ADA Service Accessibility

L-013-001 Community Transit submitted a letter and supporting technical comments on the Lynnwood Link DEIS on 9/23. We would also like to offer additional input reinforcing comments provided by King County Metro in their comment letter regarding ADA paratransit service and accessibility of the Link system.

Link station design should maximize accessibility for all patrons such that Link serves as a viable alternative to expensive ADA paratransit service for the largest possible riding population.

It is also important that Link station design carefully consider proximity and connectivity between rail platforms and parking spaces for ADA paratransit vehicles for passengers that will transfer between light rail and ADA service.

Thank you for considering these additional comments.

Roland Behee
Strategic Planning Unit Manager
Community Transit
(425) 348-2368

L-013-001

ADA and paratransit accessibility are part of Sound Transit's commitments for the project, and details will continue to be addressed during further design. The project design will meet or exceed all applicable ADA requirements.



King County

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September 20, 2013

Lauren Swift
Sound Transit Lynnwood Link Draft Environmental Impact Statement
401 S. Jackson Street
Seattle, WA 98104

Dear Ms. Swift:

L-014-001 The King County Department of Transportation (KCDOT) is pleased to submit comments on the Lynnwood Link Draft Environmental Impact Statement (DEIS). King County is a partner with Sound Transit in its mission to expand high capacity transportation across the region and attract more transit ridership. Providing reliable, frequent, rapid, and efficient all-day two-way transit service is an objective we share for the Lynnwood Link extension project.

Since Lynnwood Link light rail extension will affect King County Metro Transit's fixed bus routes, van pools and paratransit services, we have actively participated in this project since its inception and have served as a cooperating agency since September of 2011. King County has provided scoping comments as well as comments on transportation-related discipline reports and the preliminary DEIS. We appreciate that many of our previous comments have been addressed in this document and that our suggestions have helped shape the analysis.

The following comments are offered to support this project by improving the utility of the EIS as a decision-making tool. They focus primarily on segment A of the study area which roughly corresponds to Metro's service area, though our comments also address features of the project located in segments B and C. The following comments are listed under the appropriate section headings. In addition, we have attached technical comments to address more detailed concerns and suggestions.

COMMENT SUMMARY

To improve the value of the FEIS as a decision-making tool, we offer some additional considerations to address in the analysis such as alternatives which place greater emphasis on connecting transit service and non-motorized travel options as a means to access stations, as well as consideration of transit oriented development rather than park-and-ride garages. There should also be acknowledgement of the potential for future tolling and other transportation demand management strategies in the study corridor.

L-014-001

Thank you for your comments and efforts in working on the initial development of the Lynnwood Link Extension, and for the County's continued support for the project.

L-014-002 Regarding the preferred alternative, King County does not have a position on an elevated or at grade profile. King County does support alternatives A10 or A11. Locating a station at NE 130th Street would capitalize on this location's strong transit ridership projections, more efficient local bus connections and superior non-motorized access. King County also prefers a non-freeway median station location at Mountlake Terrace along with suggested design modifications to improve accessibility at the 220th Street SW and Lynnwood stations.

L-014-003 PURPOSE AND NEED

The project's Purpose and Need appears to have been revised to be more comprehensive subsequent to previous versions of the document. We suggest addressing frequency in the first bullet on page 1-4, as well as the need for more reliable reverse peak direction transit since reverse peak travel is one of the problems specifically addressed in the transportation analysis. Such a bullet could read:

Provide reliable, frequent, rapid, and efficient all-day two-way transit service of sufficient capacity to meet the existing and projected demand for travel to and from the corridor communities and other urban centers in the Central Puget Sound area.

ALTERNATIVES CONSIDERED

L-014-004 Link Station Access:

The analysis should consider a broader set of alternatives with regard to station access. Nearly every alternative and option analyzed by the DEIS proposes a similarly-sized parking garage at most stations. The resulting analysis reduces the utility of the EIS as a decision-making tool, because alternative approaches to station access and their impacts are not measured. The FEIS should evaluate alternatives to large stand-alone park-and-ride garages including increased connecting bus service, enhanced bicycle and pedestrian facilities to improve the transfer experience and transit oriented development. The FEIS needs to measure the impacts of both providing commuter parking and of not providing commuter parking or at least reduced commuter parking.

A string of park-and-ride garages as addressed in the action alternatives would result in a largely automobile-dependent light rail corridor. As shown in the DEIS, these garages would exacerbate local traffic congestion and related impacts, including delays to local and connecting bus service. By contrast, comparably scaled investments in non-motorized access and transit connections would be more consistent with the project's vision, especially as expressed by the last two bullets under 1.2.2 *Need for the Project* on page 1-5. Consideration of this alternative approach to station access in the FEIS would result in a more informative and useful analysis by addressing how ridership and travel time would be affected if comparable investments were made in connecting bus service and non-motorized access to Link stations or additional Link stations (e.g., NE 130th Street and 220th Street SW in Mountlake Terrace).

Including alternatives to park-and-rides in the EIS would also be consistent with Sound Transit's 2012 Transit Oriented Development (TOD) policies. One important goal of the policy is to

L-014-002

The County's comments on Alternatives A10 and A11, which indicate a preference for the NE 130th Street Station, are noted. Sound Transit has continued to explore design modifications for the 220 Street SW and Lynnwood stations, with improved multimodal access being key considerations. The County's preference for a non-freeway station at Mountlake Terrace and suggested design modifications at 220th Street SW and Lynnwood stations are also noted.

L-014-003

The purpose and need statement in Section 1.2 of the Draft EIS was slightly modified based on public comments received during public scoping. FTA and Sound Transit made minor clarifying edits to help simplify the discussion. High frequency service was part of the definition of all alternatives under consideration.

L-014-004

Park-and-ride lots are one of many strategies to maximize transit accessibility, and the Final EIS explores additional parking options at several stations. However, the project already assumes that in many stations, the majority of patrons would be arriving by other modes, particularly transit. The Preferred Alternative also includes improvements in bicycle and pedestrian facilities in station areas and on the streets that would be modified by the project. Sound Transit will continue to explore other modal improvement options as the project advances, in coordination with its partner agencies.

The parking supply described for the alternatives was intended to define the likely upper range of parking that would be provided, which in turn helped estimate the upper range of related impacts such as parking (including potential "hide-and-ride" parking activity), noise, visual impacts, and property requirements. Other details such as the type and

L-014-004 "Encourage convenient, safe multi-modal access to the transit system, with an emphasis on non-motorized access." A focus on TOD rather than park-and-ride garages could provide more all-day ridership, an important question for the EIS to address.

The DEIS analysis predicts an increase of approximately 23,000 riders. The assumptions for this increase must include a significant proportion of transfers from connecting bus service or non-motorized access because the park-and-ride garages will provide access for only a small portion of that increase. The FEIS should provide detail about how that connecting bus service would be supported by Sound Transit's facilities, or provided by Metro and Community Transit.

Regarding pedestrian and bicycle access, the description of the alternatives should address how future light rail passengers will safely and conveniently access the stations on foot or by bicycle. Where will paths or ramps connect to adjacent streets? What kind of bike parking will be provided? How many bike lockers will be provided?

L-014-005 **Support for NE 130th and NE 145th Street Stations:**
King County recommends that the Lead Agency include a station at NE 130th Street in the Preferred Alternative as depicted in Alternative A10 or A11 in addition to the station at 145th. A NE 130th Street station would be approximately mid-way between the Bitter Lake and Lake City Urban Villages in the City of Seattle. A station at NE 130th street would have the advantage of less east-west traffic congestion facilitating reliable local and connecting bus service along with significantly more on and off-street parking capacity as well as fewer accidents.

King County supports a station at NE 145th Street. However, issues with congestion, transit access, and parking will require roadway and pedestrian improvements to the NE 145th street corridor. King County believes that the assumption that there should be 500 car garages at both NE 145th and NE 185th should be carefully analyzed to determine whether it might be better to provide more parking at 185th than congested 145th. King County does not support parking at a NE 130th Station.

L-014-006 **Mountlake Terrace Station:**
King County supports locating a light rail station elsewhere than the I-5 median in order to allow continued transit use of the existing freeway stop by Sound Transit and Community Transit during light rail construction. A non-freeway median station location closer to the Mountlake Terrace town center would also increase light rail ridership in the long run by reducing walking distance and by increasing opportunities for TOD. As documented in greater detail in our attached paratransit comments, riders with impaired mobility would especially benefit from improved proximity, while reducing reliance on costly Access paratransit service.

L-014-007 **ADA Accessibility:**
Many paratransit trips begin in Snohomish County and end in King County. Therefore, accessibility issues at stations outside Metro's service area can still impact the cost to provide Access paratransit service. This means that facilities not only in King County need to be accessible, but that the whole system is accessible. Building new public transportation infrastructure provides an opportunity to make the system as accessible as possible, while

amount of bicycle parking, and more detailed station access planning will be developed during further design of the stations.

L-014-005

Sound Transit acknowledges the County's preference for a station at NE 130th Street. The Preferred Alternative includes an at-grade and elevated alignment with stations at NE 145th and NE 185th Streets (Alternative A1 with modifications). The Draft EIS also evaluates options for a potential station at NE 130th Street.

L-014-006

The County's preference for the Mountlake Terrace Transit Center station is noted.

L-014-007

All Sound Transit facilities and projects will be designed to meet ADA requirements. Sound Transit will continue to work with King County and its other partner agencies to develop detailed station access plans as the project advances, and this will provide the opportunity to integrate King County's suggestions and further involve you in station design decisions.

To address the larger questions regarding paratransit service at a system level, as well as other transit system integration matters, Sound Transit and King County are now collaborating on the Metro Long Range Plan and Sound Transit's Long Range Plan Update and ST3 planning.

L-014-007 employing more costly mitigation measures like paratransit to address the remaining gaps. In order to insure that the system is as accessible and as useful to as many customers as cost-effectively as possible, three key elements should be evaluated:

1. Accessibility of the service;
2. Accessibility of the connections; and
3. Accessibility to destinations served.

We have attached more detailed recommendations for ensuring system-wide accessibility including specific design suggestions for each station alternative to increase the independence of people with disabilities while also reducing the cost of providing paratransit services.

L-014-008 **Transportation Demand Management and Tolling:**
In the evaluation of long-term or cumulative impacts, the FEIS needs to provide a more accurate analysis of likely future conditions consistent with TDM and tolling for the I-5 corridor planned by PSRC and under consideration by WSDOT. PSRC'S adopted *Transportation 2040* plan includes a number of provisions to reduce future traffic congestion on key corridors in the study area and WSDOT is currently in the process of evaluating variable tolling of I-5. As these strategies will reduce traffic congestion and increase transit demand, they will directly affect the performance of all modes using the I-5 corridor, affecting the performance of each alternative and therefore need to be evaluated accordingly.

TRANSPORTATION IMPACTS AND MITIGATION

L-014-009 **Addressing impacts on people with disabilities now and in the future:**
The DEIS evaluates the impact of the project on culturally and linguistically diverse populations and low income populations but does not evaluate the impact on people with disabilities. The FEIS needs to evaluate the project's impact on people with disabilities in order to identify additional aspects of the project that could be altered to increase the benefit of the project to this population.

In addition, the DEIS does not consider the implications of upcoming demographic changes. As the population ages, the transportation needs and abilities of system users will also change. This change increases the need to ensure the new line is built to accommodate the widest variety of abilities and disabilities.

L-014-010 **Construction Impacts**
The Construction Impacts section (Section 3.3) needs to clarify how construction will impact local bus service and access to bus stops.

L-014-011 KCDOT and Metro will continue to be active partners in the Lynnwood Link project as it moves forward, participating in the SeaShore Transportation Forum and working directly with Sound Transit to optimize integration of our respective transit systems to improve regional mobility and accessibility for all.

L-014-008

The modeling assumptions used for the project were developed in consultation with WSDOT and other cooperating agencies as part of the initial methodology development and scoping phase of the Draft EIS, and the parties agreed that managed and tolled lanes on I-5 should not be assumed for several reasons.

First, the travel demand modeling performed for the Lynnwood Link Extension Final EIS is consistent with the fiscally constrained project list contained in PSRC's Transportation 2040 plan.

Second, there has been very limited development of concepts for I-5 tolling, and the lack of detailed data on the impacts of tolling on the I-5 corridor would make the analysis of impacts related to the light rail project very difficult to accurately assess. (By contrast, at a system level, a limited number of tolled facilities have been assumed outside of the corridor, including I-405 between downtown Bellevue and Lynnwood, SR 520 between I-5 and I-405, I-90 between I-5 and I-405, and the SR 99 tunnel in downtown Seattle, all of which have been or are being examined in other project-level analyses).

Third, future travel conditions without the unfunded managed toll-lane facilities would be a worst-case scenario because the traffic congestion would be worse and transit ridership likely lower than with managed and/or toll facilities. (Sound Transit's Long-Range Plan update and EIS, which is a plan-level document, does assume the regional tolling included in the current PSRC plan, but again its impact analysis and the PSRC plan's information is not location specific.) Appendix A in the Transportation Technical Report provides detailed information about the methodology for the travel demand forecasting analysis.

L-014-009

Sound Transit would not be permanently removing facilities serving

Lauren Swift
September 20, 2013
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L-014-011 We hope these comments prove helpful as the FEIS is developed. We have attached additional suggestions regarding specific detail on integration of paratransit into station alternatives. We look forward to continuing to work with Sound Transit to refine the project's design and improve its utility for optimizing regional mobility, especially the speed and reliability of public transportation.

Sincerely,



Harold S. Taniguchi, Director
King County Department of Transportation

Attachments

cc: Laurie Brown, Deputy Director, KCDOT
Kevin Desmond, General Manager, Metro Transit Division, KCDOT
Chris Arkills, Transportation Policy Advisor, King County Executive Office

people with disabilities, and the project will be built to meet ADA requirements, with operational and functional improvements in transit service as well as other local transportation facilities. Therefore, no adverse impacts to persons with disabilities has been identified. In many locations, non-ADA compliant facilities such as sidewalks and intersections would be improved, and the project would offer mobility benefits to disabled individuals as well as the general population. The EIS is intended to identify adverse impacts. Sound Transit recognizes that demographic trends indicate a continued increase in the percentage of the overall population that will be senior citizens who may have disabilities; this project would provide an alternative to driving, which would be a benefit.

L-014-010

Sound Transit recognizes the need to support and maintain transit markets during construction. The Draft EIS and the Final EIS both described mitigation measures including TDM/transit elements, with additional operational details to be prepared during final design to minimize impacts related to temporary closures. The Final EIS also provides more definition of the location and duration of closures and their related impacts, as well as minimization measures such as timing closures to be in off-peak periods, evenings, or weekends where possible.

L-014-011

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

Lynnwood Link Extension Draft EIS
Paratransit Comments

L-014-012 **Background**

Access paratransit service is provided to people when they are prevented from riding regular Metro and Sound Transit services by their disability. The service is required by the Americans with Disabilities Act of 1990 (ADA) within three quarters of a mile of all regular (non-commuter) bus services. In Snohomish County, Community Transit's paratransit service is called DART. Sound Transit also has ADA paratransit obligations along Link Light Rail lines. Sound Transit currently contracts with Metro to share the costs of Access service for trips originating and terminating in locations along light rail lines.

The Lynnwood Transit Center is a major paratransit transfer location. Customers traveling between King County and Snohomish County must transfer between Access and DART at this location. If adequate space is not provided at Lynnwood Station, another location would be needed. Any alternate location would need to have good access to I-5 in order to avoid significant impacts on Access's and DART's operational efficiency.

In addition to paratransit services, the ADA encourages transit agencies to enable as many people with disabilities to use their regular transit services as possible. Because of this and the expense of providing paratransit service, Metro works to find ways to move Access riders onto regular transit services. The main strategy used is Conditional Eligibility.

Currently 33 percent of Access customers are conditionally eligible for Access, meaning that they are able to use regular transit services under some conditions. These conditions relate to barriers that prevent them from traveling and can include things like the need for curb cuts and level sidewalks. Access reviews the trips made by conditionally eligible customers to determine whether there is an accessible pathway available on regular transit services. If a pathway is available, then the customer can no longer use Access for that trip.

The current trip review process requires that a trip be completely accessible to a customer from the origin to the destination. One barrier on a single section of a trip results in a customer receiving the entire trip on Access.

Feeder Service

Under ADA legislation, Access can provide conditionally eligible customers with a ride to a bus stop or train station and then expect customers to complete the rest of their journey on the bus or train.

Sound Transit's Link Light Rail service has reliability and frequency necessary for providing feeder service. As the Sound Transit light rail network continues to expand, a feeder service program will be able to generate significant operational efficiencies. For example, customers traveling to Seattle from Snohomish County could be transported to the Lynnwood Station by DART and then use the light rail to get to the station closest to their destination. If needed, customers could either use bus services or Access for the final segment of their trip.

L-014-012

Sound Transit will design the project to meet ADA requirements, consistent with other federal Sound Transit projects in place or under design now. The station planning programs and Sound Transit design standards incorporate this commitment for effective ADA service, including connections between providers. Further details for each station will be developed during final design in coordination with ADA service providers. More detailed service planning and any service agreements will also be conducted in the later stages of project development as the system approaches operation. However, space for paratransit is generally included in the conceptual plans for the station areas assessed in the EIS. Sound Transit also considered these comments as it updated specific station designs as part of preliminary engineering for the Preferred Alternative, but the level of design used for the EIS remains conceptual to preliminary, and many of the comments involve final design decisions and operational planning, which occur later in the project.

Sound Transit also appreciates the comments regarding persons with disabilities as well as future demographic changes affecting mobility for the general population. Several areas of the EIS address factors that will be important to providing effective ADA access, including the transportation analysis of various modal connections, as well as Section 4.4 Social Impacts, Community Facilities, and Neighborhoods, and Appendix C Environmental Justice Analysis, which incorporate transit-dependent population information from the U.S. Census. More detailed analyses for the purposes of the EIS are not necessary, however, because the project is not removing transit connections without providing improvements in services and facilities that would benefit the general population as well as persons with disabilities. No adverse impacts to persons with disabilities have been identified. However, as Sound Transit initiates final design and conducts more detailed service planning in collaboration with Metro, there will be further

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Locating both a feeder site and the transfer site at the Lynnwood Station could further increase operational efficiencies.

Accessible Transit Systems First

When it comes to accessibility, the focus is often on the required paratransit services and then on what changes can be made to improve accessibility to reduce the costs of paratransit. Building new public transportation infrastructure provides an opportunity to focus on making the system as accessible as possible first and then looking at mitigation measures like paratransit for the remaining gaps. In order to insure that the system is as accessible as possible there are three key elements that should be evaluated:

- Accessibility of the service – what can be done to insure that the new rail line is accessible? This includes elements like level boarding, stations layouts that are easy to understand and reliable facilities like elevators and toilets
- Accessibility of the connecting services – what can be done to insure that it is possible to get to and from connecting services at stations? This includes easy access to and between bus zones and paratransit zones as well as adequate facilities at the zones.
- Accessibility to destinations served – what can be done to insure that destinations served by the station are easy to get to? This is particularly important at locations that have or are expected to have transit oriented development. It includes minimizing the distance required to travel to access nearby destinations from the station and making that travel easy and pleasant.

Considering all three elements can help maximize the number of people able to use the new service. This increases the independence of people with disabilities and reduces the need for customers to ever utilize paratransit services, reducing the cost of such services.

Paratransit trips can begin in Snohomish County and end in King County. Accessibility issues at stations outside Metro’s service area can still impact the cost of Access paratransit service. This means that it is important that not only facilities in King County be accessible, but that the whole system be accessible.

Please consider the following comments.

Overall:

1. The Lynnwood Link Extension Draft Environmental Impact Statement evaluates the impact of the project on culturally and linguistically diverse populations and low income populations but does not evaluate the impact on people with disabilities. An evaluation of the impact on people with disabilities could identify additional aspects of the project that could be altered to increase the benefit of the project to people with disabilities.
2. Additionally the DEIS does not consider the implications of upcoming demographic changes. As the population ages, the transportation needs and abilities of system users will also change. This change increases the need to insure that the new line is built to accommodate the widest variety of abilities and disabilities.

opportunities to discuss these issues; the Sound Transit System Planning program and the Metro Long Range Plan update also includes additional collaborative efforts to consider these suggestions.

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Page	Comment
Appendix F, Sheets 65-71	<p>N 130th St Station Metro Accessible Services anticipates using this station as an Access feeder location but not as a major transfer location. For this reason the one paratransit bay provided is adequate.</p> <p>Options 1 & 2 - The elevators to the platform should be in close proximity to the paratransit zones and bus zones. The paratransit zone is currently too far from the bus zones. Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p>
Appendix F, Sheets 72-79	<p>N 145th St Station Metro Accessible Services anticipates using this station as an Access feeder location but not as a major transfer location. For this reason the one paratransit bay provided is adequate.</p> <p>Option 1 & 2 - NB bus bay is far from station, making access difficult for some customers with disabilities. Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p> <p>Option 2, Sheet 76 - If paratransit and SB bus zone could be co-located at the same location as the current paratransit zone it would improve access for customers with disabilities.</p>
Appendix F, Sheets 80-83	<p>N 155th St Metro Accessible Services anticipates using this station as an Access feeder location but not as a major transfer location. For this reason the one paratransit bay provided is adequate. However, the current location of paratransit zone is not suitable. The paratransit zone should be located in close proximity to both bus zones and the elevators to the platform.</p> <p>This design provides very easy access for customers with disabilities from bus zones to elevators to platform. Having three elevators that provide access to the platform insures excellent access for customers with disabilities in the event one is not functioning.</p>
Appendix F, Sheets 84-94	<p>N 185th St Metro Accessible Services anticipates using this station as an Access feeder location but not as a major transfer location. For this reason the one paratransit bay provided is adequate.</p> <p>Options 1 & 2 - The paratransit zone is well located. Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p> <p>Option 3, Sheet 91 - This design appears to require customers to use an elevator when traveling between the paratransit bay and the bus bay in the transit roadway. This is</p>

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	<p>not as easy to use as Options 1 and 2. Having two elevators that provide access to each platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p> <p>All Options (Sheets 84, 88 & 91) - It is unclear what the pathway is for passengers walking between station and EB bus zone on NE 185th. A N/S crosswalk needs to be provided near the intersection of NE 185th St and the reconstructed 5th Ave NE in order for the EB zone to be usable and safe. If the paratransit bay is moved to enable this crosswalk, it should still be located very close to its current position.</p>
<p>Appendix F, Sheets 95-98</p>	<p>Mountlake Terrace/236th St SW Transit Center Station Metro Accessible Services anticipates using this station as an Access feeder location but not as a major transfer location. Metro considered this station as a potential transfer point between Community Transit's DART service and Metro's Access service. However, this location lacks a southbound off ramp and a northbound on ramp to I-5. In addition, the site is space constrained, making it difficult to find enough space for the number of required paratransit zones. For this reason the one paratransit bay provided is adequate for Metro's needs. Sound Transit should also consult with Community Transit in regards to their paratransit needs at this location.</p> <p>The distance between the paratransit zone and the EB bus zone on 236th St SW is further than optimal.</p> <p>Having two elevators that provide access to each platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p>
<p>Appendix F, Sheets 99-101</p>	<p>Mountlake Terrace/236th St SW Freeway Station The station design lacks a paratransit zone. The distance between the bus zones and the station platform is extremely large. If the station were modified to include a paratransit zone, it would also likely be extremely far from the station platform. This distance is likely to be beyond the capabilities of some customers with disabilities and would may result in additional paratransit usage. The distance may also be large enough that feeder service would not be possible at this station. The additional paratransit operations costs would impact the cost of providing Access and DART and would likely be shared with Sound Transit.</p> <p>Metro Accessible Services recommends that this station option not be selected.</p>
<p>Appendix F, Sheets 102-105</p>	<p>Mountlake Terrace/220th St SW Access does not anticipate using the paratransit bay at this station as it is in Snohomish County. However, this station might be an adequate alternate location for transfers between Community Transit's DART service and Metro's Access service. Conducting transfers at this location would reduce the distance that Access vehicles were required to travel in to Snohomish County. Further discussion would be needed between Community Transit, Metro and Sound Transit about whether this location would be a suitable alternative to the Lynnwood Transit Center for paratransit transfers between Access and DART.</p> <p>The station design is unclear about how customers could get from the paratransit bay</p>

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	<p>to the WB bus zone on 220th St SW other than via the station platform. Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.</p> <p>Sound Transit should also consult with Community Transit in regards to their paratransit needs at this location.</p>
Appendix F, Sheets 106-121	<p>Lynnwood Station <i>General Comments</i></p> <p>The Lynnwood Station is expected to be the most utilized station of the Lynnwood Link Light Rail Extension. This is because this station will be the main point of access to the planned Lynnwood downtown area and it will serve as a major interchange for bus services, with services from Everett expected to terminate here. In addition, the station will also have a large number of parking spaces for customers driving to the station. Each of these elements pulls the station design in a particular direction and balancing the needs of each type of access can be difficult.</p> <p>From an accessibility perspective, the two most important factors at this station are ease of access from the planned downtown and ease of transferring between the rail line and bus services. The 200th St SW option demonstrates prioritizing access to the planned downtown over ease of interchange. The Lynnwood Transit Center Option and the Lynnwood Park and Ride Option 2 both demonstrate the opposite. The Lynnwood Park and Ride Option 1 prioritizes access for car drivers over the other two objectives.</p> <p>In order to maximize accessibility at the Lynnwood Station, Metro Accessible Services requests that Sound Transit consider altering the 200th St SW Station to include a relocated transit center that is immediately adjacent to the station. This option could provide good access to both the planned downtown and to the connecting bus services. This would maximize the accessibility of the station and would help to increase the independence of people with disabilities while also reducing the cost of providing paratransit services.</p> <p>In addition to concerns about the accessibility of the station designs provided in the DEIS, Metro Accessible Services is also concerned about the number of paratransit bays provided in the Lynnwood Station drawings. The Lynnwood Transit Center is the current location of transfers between King County's Access service and Community Transit's DART service. Metro estimates that a total of four paratransit zones would be at this location.</p> <p>In addition, Metro is interested in pursuing feeder service to and from this station. Many paratransit customers may be able to complete much of their journey on light rail. A customer traveling from Snohomish county to a location in Seattle could be dropped off at the Lynnwood Station by DART and then picked up by Access at the Link station closest to their destination. This could result in a significant reduction in the cost of providing paratransit service. In order for this service to work, it is extremely important that paratransit bays be close to the to the Link Station so that</p>

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customers can easily get from DART to the light rail. Building a Lynnwood Station that has paratransit zones that can serve both as a feeder location and as a transfer location between paratransit services would allow for both Access and DART to maximize operational efficiencies.

Paratransit shelter – Current transfer operations are conducted on a hand to hand basis. This means that no customers transferring between DART and Access are ever left alone. If the connecting vehicle is late, then the first vehicle must wait until it arrives to hand off the customer. This process adds an approximate 1,041 service hours annually to Access service, costing \$58,608. This policy likely adds a similar amount to DART's costs. Metro Accessible Services is interested in examining solutions to allow the transfer of customers between services without requiring vans to wait for the connecting vehicle.

In order for paratransit vehicles to be able to drop customers off to wait for their connection, two issues would need to be resolved: protection from the elements and hand to hand service. Some paratransit customers are particularly vulnerable to the elements. In order to be able to drop off customers, a shelter with radiant heating and wind protection on four sides would be required. This shelter could also be incorporated into shopping/commercial facilities at the station, similar to those in the 200th St SW Option. The facilities would need to be close to the paratransit zone and would also be useful for feeder trips if they were located close to the station platform and the bus zones.

The current system of providing hand to hand service was originally set up because some paratransit customers cannot be left alone. Currently 8% of the customers switching between Access and DART at the Lynnwood Transit Center require hand to hand service. Hand to hand service is not something that is required by the ADA, and it may be possible to identify partner agencies that could assist with these trips.

In addition to the estimated savings from not providing hand to hand transfer service, Access estimates that the number of paratransit bays at the Lynnwood Station could be reduced to two bays from the four that would otherwise be required. [this is subject to further consultation with Community Transit]

Lynnwood Station Option Specific Comments:

200th St SW Option, sheets 106-109 - The distance between the paratransit zone, the bus zones and the station are significant and could impact the ability of customers with disabilities to transfer between services. The proposed design appears to prioritize the access of drivers using the parking garage over other modes of transportation.

Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.

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The number of paratransit zones provided is inadequate to maintain the current paratransit transfer operations.

Lynnwood Transit Center Option, sheets 110-113 - The distance between the paratransit zone and the station and bus zones is adequate in this station design.

Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.

The number of paratransit zones provided is inadequate to maintain the current paratransit transfer operations.

Lynnwood Park and Ride Option 1, sheets 114-117 - The bus zones are far removed from the station and paratransit zone, making it difficult for customers with disabilities to transfer between Link and local bus service. This could increase the need for customers to use paratransit, increasing the operations costs for Sound Transit, Community Transit and Metro. Requiring customers to cross both 46th Ave SW and the Kiss and Ride access road may also discourage customers from making the required interchange, particularly those with disabilities.

Having two elevators that provide access to the platform is good because it insures access for customers with disabilities in the event one elevator is not functioning.

The number of paratransit zones provided is inadequate to maintain the current paratransit transfer operations.

Lynnwood Park and Ride Option 2, sheets 118-121 - The paratransit zone is separated from the bus zones. Customers transferring from paratransit services to bus services would need to travel a significant distance, including taking an elevator to the platform, traveling to the other elevator and then taking that one to the bus bays. Paratransit to bus connections would therefore be reliant on both elevators being in working order. Additionally, the lack of a crosswalk between the station island and the paratransit bay/kiss and ride area means that if the elevator on the south end of the station is out of order, customers will be forced to cross the transit roadway in an area without a marked crosswalk.

The number of paratransit zones provided is inadequate to maintain the current paratransit transfer operations.



September 25, 2013

Lauren Swift
Sound Transit
401 South Jackson Street
Seattle, WA 98104

Subject: Lynnwood Link Extension Draft Environmental Impact Statement

Dear Ms. Swift,

L-015-001

The Puget Sound Regional Council (PSRC) appreciates the opportunity to comment on the Lynnwood Link Extension Draft Environmental Impact Statement (DEIS) documents. Implementation of high-capacity transit to support growing communities is fundamental to the success of VISION 2040, the region's integrated long-range strategy for growth management, transportation and economic development. In addition, the *Growing Transit Communities Partnership*, housed at PSRC, focuses on developing equitable transit communities at station areas within this, and other, corridors. Accordingly, the PSRC has an on-going interest in transit system planning for the Northgate-Lynnwood corridor and has been designated as a Participating Agency in the project.

We commend Sound Transit for their work on the Lynnwood Link Extension Project to date and specifically the DEIS effort. The scope of the Lynnwood Link Extension DEIS spans the many growth management, transportation and economic development arenas for which the Puget Sound Regional Council oversees long-range regional planning. The DEIS has therefore been reviewed by transit planning, transportation modeling, and growth management department staff. That review found consistency with long-range planning documents and general agreement with the specific methodologies used to evaluate the impacts and benefits of different stations.

We do wish to make two primary recommendations moving forward with the final Environmental Impact Statement, on which we elaborate later in this letter:

- Develop a finer-grained measure to differentiate TOD potential between station locations and provide greater transparency on how qualitative rankings were assigned.
- Provide station access data by mode and clearly define how those different modes feed into the potential ridership calculation.

We commend Sound Transit on the effort made in the Lynnwood Link DEIS to examine and qualify the varying levels of TOD potential that different station areas and specific station locations offer. This new effort acknowledges the critical link between land use and transit investments to support the region's growth strategy and support transit ridership. In addition, it sets an important precedent for Sound Transit's future system planning efforts.

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The Draft EIS and Final EIS summarize Sound Transit's assessment of transit-oriented development (TOD) potential in Table 4.2-3; this is based on the *Station Area Transit-Oriented Development Potential Report* conducted to support station area and project planning. The report was updated as part of the continued planning for the project during preliminary engineering and environmental analysis. A copy of the *Station Area Transit-Oriented Development Potential Report* is available through on the Sound Transit Website for the project at <http://www.soundtransit.org/Projects-and-Plans/Lynnwood-Link-Extension/Lynnwood-Link-Document-Archive>.

Based on comments from the Sound Transit Board and other parties, the level of information and the methods used were effective in highlighting the relative differences between station choices. The level of detail on TOD potential is consistent with Sound Transit practices for other recent Sound Transit EISs and appropriate at the EIS phase for comparing alternatives. The assessment is summarized to help determine the likelihood that the project could indirectly impact land use and other environmental conditions, as well as to consider whether it helped support land use plans and policies.

The Transportation Technical Report for the Final EIS has additional discussion of mode choice for accessing station areas, as well as more information on parking and other station access factors, including the relative accessibility of various station alternatives by all modes. The model results do not lend themselves directly to detailed analysis by mode, and instead are provided as an indication of likely ridership levels given surrounding land use, including future population and employment levels, existing transit use, and connecting transportation facilities. Further calculations of access by mode would be done during final design.

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In the PSRC's comments on the North Corridor Transit Project Alternatives Analysis (2011), we requested that the DEIS consider the following three points that relate directly to ridership from station access and station area TOD:

- *"Ridership Potential:* The Alternatives Analysis Report provides overall ridership numbers for considered alternatives. PSRC suggests that the EIS segregate the potential ridership data by access mode (pedestrian, bicycle, transit transfer, car) for each station and include estimates on potential ridership that future transit-oriented growth could generate.
- *Transit Service Accessibility:* The Alternatives Analysis Report assigned the same rating of "moderate" to all three light rail alternatives for all modes of access (pedestrian, bus, bicycle, and park and ride). The EIS should provide a finer-grained measure, defined by a scale of five or ten rather than three, or use a more nuanced metric, in order to better differentiate between the alternatives.
- *Station Siting Considered in Draft EIS:* PSRC suggests that station siting effects on local planning efforts be carefully considered in the EIS. For example, proposed station areas should be located proximate to areas designated for high intensity transit-oriented development wherever possible. In addition, the siting of the northern terminus of the North Corridor Transit Project in Lynnwood should support various alignment alternatives of the high capacity transit corridor between Lynnwood and Everett that Sound Transit will consider in the future."

L-015-003

These requests were further supported by the final recommendations that emerged from the *Growing Transit Communities Partnership* in July 2013. One of the 24 Strategies recommended by the GTC Partnership was "Locate, Design and Provide Access to Transit Stations to Support TOD." The Strategy specifically calls for the following actions from transit agencies:

- Action 8.2: Strengthen criteria for selecting transit alignments and station locations to include TOD potential alongside other criteria such as environmental impacts, costs, and ridership potential. TOD potential should reflect both existing and planned uses and densities within transit station areas.
- Action 8.4: Design stations to provide multimodal access to transit, including on foot, bicycle, and via connections with other transit services.
- Action 8.5: Implement transit access and parking management strategies that support and encourage access via multiple modes of travel to the transit system, and that provide alternatives to automobile travel through approaches, such as: transit service connections to surrounding neighborhoods, bicycle and pedestrian connections, and demand management strategies (e.g., parking fees).

We commend Sound Transit for the *Station Area Transit-Oriented Development Potential Report* (April 2013) that the agency completed to support the Land Use portion of the Lynnwood Link Extension DEIS. The TOD Potential Report considered many of the issues raised in the PSRC comments and GTC Partnership recommendations noted above, including an examination and comparison of station areas based on criteria such as existing station conditions, station area character, station access, and potential development opportunities. We feel that these are critically important criteria inform station location decisions that best support existing communities and future residential and employment growth. Together with the recently board-adopted TOD Policy, this work sets an important new precedent for the agency to strengthen their consideration of TOD Potential in system planning and development.

We do however feel that the final EIS, as well as future system planning and development processes, should do more to make clear and explicit the consideration of TOD development potential and multi-modal access in the final EIS and future system planning and development processes. We make the following

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Sound Transit considered the suggestions of the PSRC as it developed the methods for the EIS, and Sound Transit circulated methodology reports for the EIS to participating agencies for comment following the project NEPA/SEPA scoping period. It is important to note that the tiered approach to the Alternatives Analysis was by nature better suited to the use of evaluation criteria and ratings because it was conducted to help identify, refine, and narrow a wider range of modal and corridor options, including station sites.

For the EIS, the definitions of alternatives and their features were better established from the outset. Measures such as ridership potential and access could be more directly defined as part of the alternative designs and also considered through the application of Sound Transit's forecasting model. The alternatives under consideration were also similar in their locations and the markets served, and primarily involved siting and design choices, so qualitative measures did not tend to markedly differentiate the alternatives. Therefore, the use of detailed ratings in the Final EIS was limited; instead, the analysis focused on identifying areas of impact and describing mitigation where appropriate.

The discussion of Land Use in Section 4.2 included an assessment of consistency with planning policies (Appendix I-4.2), which noted areas where stations were located near where local plans or policies anticipated high capacity transit (HCT) or they at least contemplated increased densities; however, most jurisdictions make HCT-oriented designations after HCT projects are in the planning and design stages rather than before.

Finally, Section 2.5 described the key factors considered in developing alignment and station combinations; while land use conditions were an important factor, so were the placement of an alignment relative to

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recommendations, consistent with our comments on the North Corridor Transit Project Alternatives Analysis and the recommendations of the Growing Transit Communities Partnership.

Develop a finer-grained measure to differentiate TOD potential between station locations and provide greater transparency on how qualitative rankings were assigned. While the qualitative scales of “limited-moderate-strong” TOD potential have the potential to be useful, they do not seem to always accurately reflect the station conditions described in the DEIS. In many cases, station locations that seem to perform differently on sub-measures were assigned the same value on the scale. In one example of this, the three station locations proposed for the Lynnwood Transit Center performed identically for existing conditions (limited-moderate). However, for the factors that comprised existing conditions, the 200th Street SW station clearly outperformed the other two station locations on two factors (population and employment, and existing station area character) and performed equally on the third factor (balance of mix of uses). Because the TOD Potential Report does not provide a definition for what specifically constitute a score of “limited” versus “moderate” versus “strong,” it is not possible to discern why these differing performances yielded the same designation. We recommend a more clearly defined and transparent methodology, as well as use of finer-grained measures that better differentiate between station locations. A forced ranking (e.g., 1st, 2nd, 3rd) of potential station locations for different measures would also provide a way to better compare relative performance.

Provide station access data by mode and clearly define how those different modes feed into the potential ridership calculation. The TOD Potential Report provides data on station access within the 15-minute walk and bicycle sheds. It is not clear how this information informs ridership projections. The detailed modal access data is not presented in the discussions of ridership in the main document of the DEIS. In order to be consistent with the intent of regional policy to promote multi-modal mobility and Sound Transit’s recently adopted Station Access policy that strengthens non-vehicular station access, it is important that system planning and development analyses carefully examine and disclose the levels of multi-modal access that different station locations may provide. We recommend that this data be better called out in the final EIS and, similar to the previous comment, be explicitly used to differentiate among station locations or alignments. Without better disclosure of how these analyses are performed and function, the value of the information is significantly diminished.

The Lynnwood Link Extension is an important long-range investment for our region. We commend Sound Transit again for the DEIS effort, and especially for the strengthened consideration of TOD potential. We appreciate the opportunity to comment and participate. If you have any questions regarding our comments, please contact me at (206) 971-3288 or snikolic@psrc.org, or our SEPA Responsible Official, Ivan Miller, at (206) 464-7549 or imiller@psrc.org.

Sincerely,

Sara Schott Nikolic, Principal Planner
Puget Sound Regional Council

Ivan W. Miller, SEPA Responsible Official
Puget Sound Regional Council

CC: Matt Shelden, North Corridor Light Rail Development Manager
Gil Cerise, Senior Transit Planner

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available rights-of-way, topographical challenges, and built and natural environmental features.

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The *Station Area Transit-Oriented Development Potential Report* was prepared by Sound Transit to help differentiate station options with respect to future development potential and is primarily based on existing conditions. This work was conducted while PSRC’s Growing Transit Communities Partnership (GTC) efforts were underway and Sound Transit reviewed and coordinated work accordingly. As noted in the comments above, the EIS is intended to disclose potential impacts that could occur with the development of the project alternatives, and to explore measures that would avoid, minimize, or mitigate impacts.

Sound Transit agrees that assessments of TOD as well as access are important elements of planning for stations, and the TOD report was available to the Board and the public prior to the identification of the Preferred Alternative. The updated report is similarly available along with the Final EIS; the EIS is not the only source of information that Board members consider in their decision-making. In addition, as described in Chapter 2 of the Draft EIS and the supporting Alternatives Analysis completed in 2011, Sound Transit considered TOD, access and other issues in detail along with a wide range of other factors as it defined the light rail alignment and station alternatives for the EIS.