

# MEMO



May 5, 2016

TO: City of Shoreline Planning Commission  
FROM: John Evans, Lynnwood Link Project Manager, Sound Transit  
SUBJECT: Comments on Draft Planning Commission Amendments to Ordinance No. 741

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Dear Planning Commissioners:

Sound Transit submits the following comments for your consideration regarding potential amendments to Ordinance 741 (20.40.438.E). We greatly appreciate the Commission's ongoing consideration of Sound Transit's collaborative work with City staff to develop efficient and effective code updates to allow for the timely delivery of high quality light rail service to the City while ensuring adequate protections for City residents, City services and infrastructure.

To avoid creating code provisions that duplicate existing requirements and add unnecessary reporting and processing time for both Sound Transit and City staff, we ask that you make the following additional revisions to the draft amendments to Ordinance 741.

## **Light Rail Subcommittee Potential Amendments to draft Ordinance No. 741**

The Planning Commission Subcommittee amendment language is shown in **orange font** and ~~strikethroughs~~. The requested additional Sound Transit changes are shown in **red font and strikethroughs**. The rationale for the suggested changes is in *italics*.

### **20.40.438 Light rail transit system/facility**

**E. The following supplemental submittal items are required to permit a light rail transit facility or light rail transit system within the City:**

- 1. A Construction Management Plan or agreement will be completed before any building permit may be issued for the proposal;**
- 2. A **Post Construction Parking and Operational** Management Plan or agreement will be completed before **light rail service** the proposal's operations begins, which **and will** include management and enforcement techniques to guard against **such impacts as off-site** parking impacts to **in** surrounding neighborhoods; **and noise that exceeds codified standards****

*The “and” is stricken because we are concerned that “and operational” could be misunderstood to mean a plan of all operations, not just parking. The term “operations” in transit engineering refers to the service characteristics of operating the system, for example travel times, stop schedules, headways, etc. By removing the “and”, operational is associated with parking which better reflects the subject of the plan.*

*The reference to noise is removed since addressing noise impacts of the project in the parking plan significantly increases the scope and cost of the plan, and adds excessive and unnecessary redundancy to the project review process for Sound Transit and the City. The operational noise from Sound Transit trains is governed by the strict standards and criteria of the Federal Transit Administration (FTA). This has been documented in the analysis and mitigation included in the Lynnwood Link Extension Final Environmental Impact Statement (EIS). The documented noise impacts, mitigation and monitoring has been approved in the formal Records of Decision by FTA and the Federal Highways Administration. The City has not previously raised concerns about the adequacy of this analysis and mitigation.*

*The project is required by FTA to include mitigation to keep noise levels under FTA thresholds for impacts and protect residential neighborhoods by including ground level noise walls, noise barriers on the elevated light rail guideway, and even in some cases the provision of sound insulation in homes. The final design process starting now will refine the details of the mitigation (e.g., exact height and locations of new or relocated noise barriers). Additionally, Sound Transit will be working with City staff to keep residents informed of this through presentations at open houses as the final design progresses.*

*Noise from the on-going operation of park and ride and bus transfer facilities, as at the 145th and 185th stations, will be subject to the City’s existing local noise ordinances, as will construction noise. As made clear in the EIS, the City of Shoreline regulates noise pursuant to Chapter 9.05 (Public Disturbance Noise) of City code. To add further noise analysis or monitoring beyond that already required under the federal monitoring and mitigation, and the existing Shoreline noise code requirements would be needlessly redundant and excessive.*

5.3. An Access Assessment Report is required for light rail transit system/facilities. The Access Assessment Report will analyze, identify and prioritize multi modal access improvements. The Access Assessment Report is intended to supplement the analysis and mitigation included in any environmental review document prepared for the proposed project. The In general the Access Assessment Report will address: facilities improvements near the stations for pedestrians and buses bicycles, paratransit riders, and “kiss & ride” users; and traffic. A more specific scope of for the Access Assessment Report will be agreed to by the applicant and the City. The City may require third party review of the Access Assessment Report at the applicant’s expense.

*We request removal of references to buses, paratransit riders, kiss & ride, and traffic since this would make the Access Assessment Report include duplicative and excessive analysis. These subjects are addressed as part of Sound Transit’s well documented project design and agency collaboration process. Station facilities along with associated vehicular and pedestrian circulation are designed by working with affected partner agencies and the public to both mitigate direct impacts to the local neighborhood, and to accommodate all station users.*

*Additionally, the reference here to buses should be removed because any requirement for study of King County Metro’s (KCM) and Community Transit (CT) operations would need much more definition before Sound Transit could include it in a study. Sound Transit cannot justify funding the study of transit (such as improved bus service) that falls under the authority and responsibility of KCM and CT. We can and will accommodate KCM’s service plan integration with bus stops at or adjacent to the station, but not beyond the immediate station area. Adding bus operations to the access plan is not likely to result in useful information since the planning and provision of new bus service will be determined by KCM and CT near the time of project operation in 2023. KCM and CT are very much involved in the final design process to make sure the stations and adjacent stops adequately accommodate their needs.*