



April 3, 2019

Hearing Examiner Andrew Reeves
City of Shoreline
17500 Midvale Avenue N
Shoreline, WA 98133

**Subject: PLN19-0019: Sound Transit's response to staff report
recommending approval of Critical Area Special Use Permit**

Dear Hearing Examiner Reeves:

Sound Transit generally agrees with the staff report and its recommendation that the Hearing Examiner approve the requested Critical Area Special Use Permit (CASUP).

I am submitting this letter before the hearing in order to identify Sound Transit's concern with recommended condition of approval No. 1, and with its apparent inconsistency with recommended condition 4. Recommended condition No. 1 concludes by stating:

Any changes to these plans shall be submitted to the City under a separate Site Development Permit application for review and approval of such modifications.

Recommended condition 4 concludes by stating:

If Sound Transit desires to modify the project from that shown on the submitted site plan dated February 13, 2018 and January 17, 2019 (Exhibit N) and the mitigation, restoration, monitoring plans contained in the Critical Areas Report dated July 13, 2018 (Exhibit E), Sound Transit shall submit a request for review and approval of such modifications to the City or the issuance of a new or amended CASUP.

Sound Transit assumes that the "or" is intended to be "for" in the phrase "...City or the issuance" in the final line of condition No. 4, but Sound Transit also is unclear about the intent of No. 1 and about the relationship between No. 1 and No. 4.

Sound Transit acknowledges that it must obtain Site Development Permits for work in critical areas (as provided in recommended condition 2), however, recommended condition No. 1 appears to require a separate Site Development Permit to be obtained for any proposed change to the plans, no matter how minor. Recommended condition No. 4 appears to say that the City will exercise

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appropriate discretion in responding to proposed modifications, in order to decide whether an amended CASUP is appropriate.

Sound Transit does not believe it is reasonable to require a new, separate Site Development Permit for any modification to the site plans, no matter how minor, and there is no counterpart to the last sentence of recommended condition No. 1 in the prior CASUP approved by Hearing Examiner Hunter on January 4, 2019 under PLN18-0114 (McAleer Creek). Recommended condition No. 4 is consistent with condition No. 6 in the McAleer Creek CASUP.

Sound Transit agrees that recommended condition No. 4 is appropriate, but for all the reasons identified in this letter, Sound Transit requests that the last sentence of recommended condition No. 1 not be included by the Hearing Examiner in his decision.

In addition, Sound Transit would like to respond as follows to the two ideas put forth by the City's consultant engineers (see top of page 8 of the staff report):

- 1) The contractor does plan to leave the temporary shoring in place and cut it below the ground surface in accordance with WSDOT specifications.
- 2) Sound Transit completed a comprehensive structural analysis for the guideway that is documented in the *L300M 100% Structural Calculations Aerial Guideway* report and provided to the City of Shoreline. Based on the structural calculations, the elevated guideway structure meets or exceeds all Sound Transit and code design requirements. The elevated guideway structure has been evaluated under an operational seismic event (150-year recurrence interval) and a non-operational, no-collapse seismic event (2,500-year recurrence interval) per Sound Transit's Design Criteria Manual, Revision 4. The elevated guideway has been designed using the AASHTO Load and Resistance Factor Design (LRFD) approach. The elevated guideway design included both seismic loading as well as the post-seismic condition where a potential landslide results in the loss of ground support around the drilled shafts. This post-landslide scenario was considered as part of the no-collapse evaluation for drilled shafts in the CASUP area. Based on the geotechnical and structural analysis, it is the opinion of our qualified professionals that the elevated guideway will perform adequately for the case where support provided by the embankment is temporarily lost following the maximum design earthquake (MDE) design-level seismic event.

Also, attached is a short PowerPoint that Sound Transit intends to present at the April 10th hearing in support of the application.

Thank you for your consideration of this request.

Sincerely,



Karin Ertl
North Corridor Environmental Manager

cc: Brian Lee, City of Shoreline
Juniper Nammi, City of Shoreline