Special Use Permit Application

For:

Construction and Operation of the Lynnwood Link Extension Project within the City of Shoreline, including the Light Rail Guideway, Shoreline South/145th Station and Accessory Parking Garage, Shoreline North/185th Station and Accessory Parking Garage; and Establishment of Construction Staging and Work Areas for Light Rail Transit Facilities

Located at:

The light rail alignment within the City of Shoreline's jurisdiction will start at the Seattle/Shoreline city limits at NE 145th Street and extend north for approximately 3.2 miles until the Shoreline/Mountlake Terrace city limits at NE 205th Street.

The Shoreline South/145th Station and Garage will be located on the east side of I-5 at NE 148th Street. The Shoreline North/185th Station and Garage will be located on the east side of I-5 at NE 185th Street.

City of Shoreline Project Addresses:

Shoreline South/145th Station and Garage (14701 5th Avenue NE)
Shoreline North/185th Station and Garage (710 NE 185th Street)

Submitted to:

City of Shoreline
Department of Planning and Community Development

Applicant:

Central Puget Sound Regional Transit Authority (Sound Transit)
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TABLES

ATTACHMENTS

ACRONYMS AND ABBREVIATIONS

AASHTO	American Association of Station Highway and Transportation Officials
ADA	Americans with Disabilities Act
ADR	Administrative Design Review
BRT	Bus Rapid Transit
CASUP	Critical Areas Special Use Permit
CPTED	Crime Prevention Through Environmental Design
DCM	Design Criteria Manual
DPCD	Department of Planning and Community Development
FEIS	Final Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
HOV	high-occupancy vehicle
I-5	Interstate 5
IBC	International Building Code
IES	Illuminating Engineering Society
JARPA	Joint Aquatic Resource Permit Application
LED	light-emitting diode
LEED	Leadership in Energy and Environmental Design
LID	low impact development
LOS	level of service
MUR-45	Mixed Use Residential 45-foot height [zone]
MUR-70	Mixed Use Residential 70-foot height [zone]
NEPA	National Environmental Policy Act
NTSP	Neighborhood Traffic Safety Program
PA-3	Planned Area 3 [zone]
R-6	Residential 6 dwelling units/acre [zone]
ROD	Record of Decision
SEPA	State Environmental Policy Act
SMC	Shoreline Municipal Code
SR 104	State Route 104
ST2	Sound Transit 2
ST3	Sound Transit 3
ST*art*	Sound Transit Art
the Project	Lynnwood Link Extension
TPSS	Traction Power Substations
WAC	Washington Administrative Code
WSDOT	Washington State Department of Transportation

1.0 Summary of Proposal Requested in this Application

Under this Application, Sound Transit is seeking a Special Use Permit (SUP) for the portion of the Lynnwood Link Extension Project located within the city limits of the City of Shoreline (referred to as the Project in this Application). The Project includes approximately 3.2 miles of new light rail guideway, two stations with associated facilities, and two parking garages. The Project area includes all acquired properties and easements needed for construction and operation of the Project. Attachment A, Vicinity Map, includes a vicinity map for the Project.

The Project includes the following:

1.1 Light Rail Guideway and Associated Project Elements

1) Construction of approximately 3.2 miles of new light rail guideway on the east side of northbound Interstate 5 (I-5) from the Seattle/Shoreline city limits at NE 145th Street to the Shoreline/Mountlake Terrace city limits at NE 205th Street. The majority of the light rail guideway will be located on Washington State Department of Transportation (WSDOT) right-of-way, with some areas of the alignment located within City right-of-way and private parcels.

2) Construction of associated infrastructure such as roadway and sidewalk reconstruction, traffic signals and roadway illumination systems, Traction Power Substations (TPSS), signal bungalows, stormwater facilities, retaining walls, access roads, and other light rail transit facilities associated with the Project.

3) Demolition of approximately 52 dwelling units on 87 full acquisition properties located in the Project area (Attachment B, Property Acquisitions). Approximately 147 partial acquisitions will also be required, and one structure is anticipated to be demolished on these properties.

4) Grading of existing properties to provide the design grades needed to accommodate the new construction for the guideway and associated facilities. Both excavation and filling activities will be required, and any excess material not needed for fill will be removed from the site and reused or disposed of in an approved disposal site.

5) Utility relocations for water, sewer, gas, street lighting, storm drainage, and underground and overhead electrical and telecommunications infrastructure.

6) Landscape restoration and mitigation as a result of construction.

7) Critical areas restoration as a result of construction.

8) Establishment of temporary construction staging areas to accommodate the construction of two light rail transit stations and parking garages, and other light rail facilities, such as the aerial guideway and its structural support, trackwork, and systems. The temporary construction staging areas will be necessary for approximately 6 years, starting in 2019, and concluding after final installation and testing of the follow-on finishes and systems

contracts, prior to commencement of revenue service in 2024. Temporary construction staging areas will be restored to their previous condition following construction.

9) Operation of the light rail transit facilities in the City of Shoreline including two stations and associated garages (see below).

1.2 Shoreline South/145th Station and Garage

1) Construction of a new light rail transit station (Shoreline South/145th Station) on 5th Avenue NE at the west end of NE 148th Street.

2) Construction of a bus transit center adjacent to the Shoreline South/145th Station accessed from NE 148th Street at 5th Avenue NE.

3) Construction of an approximate 500-stall parking garage for the Shoreline South/145th Station on the same site as the station, with access from NE 148th Street at 5th Avenue NE.

1.3 Shoreline North/185th Station and Garage

1) Construction of a new light rail transit station (Shoreline North/185th Station) on the north side of NE 185th Street, between the east side of I-5 and 8th Avenue NE. Construction of an approximate 500-stall parking garage adjacent to the Shoreline North/185th Station east of the station, west of 8th Avenue NE, and north of 185th Street, with access from 8th Avenue NE.

2) Construction of a bus transit center on the top deck of the parking garage adjacent to the Shoreline North/185th Station accessed from NE 185th Street and the realigned 5th Avenue NE.

3) Realignment of a portion of 5th Avenue NE, on the east side of I-5 and south of NE 185th Street, to align the bus transit center entrance to 5th Avenue NE.

2.0 Background

Sound Transit is a regional transit authority authorized to implement high-capacity transit systems. On November 5, 1996, Central Puget Sound voters approved local funding to implement the Sound Move plan. Sound Move represents the region's preferred transportation strategy and is consistent with and implements applicable federal, state, and local requirements for transportation and land use/growth management planning.

Sound Move includes three types of regional transportation facilities and services:

- Regional Express bus/high-occupancy vehicle (HOV) System: New regional bus routes operating primarily on highway HOV lanes.
- Sounder Commuter rail: Rush-hour passenger services on 82 miles of an existing rail corridor, serving 14 stations in Lakewood, Tacoma, the Green River Valley, Seattle, and Everett.

- Light rail: Approximately 25 miles of new light rail with approximately 26 stations between SeaTac and North Seattle (Central Link), and a 1.6-mile light rail line with five stations between downtown Tacoma and the Tacoma Dome regional transportation terminal (Tacoma Link).

In 2008, voters approved the Sound Transit 2 (ST2) Plan, which included 36 miles of additional light rail to form a 55-mile regional Link light rail system. Link will expand the current system from Seattle north into Snohomish County, across Lake Washington into East King County, and south of Sea-Tac International Airport.

The Lynnwood Link Extension Project is a component of the ST2 Plan and extends the light rail system from Northgate in Seattle north for 8.5 miles into the Cities of Shoreline, Mountlake Terrace, and Lynnwood. The Lynnwood Link alignment generally follows I-5 and will be a combination of surface, elevated, and retained cut-and-fill configurations. Four stations are planned to be constructed as part of Lynnwood Link: the first at the existing North Jackson Park-and-Ride at the NE 145th Street interchange in Shoreline, the second at NE 185th Street in Shoreline, the third at the existing Mountlake Terrace Transit Center, and the fourth at the existing Lynnwood Transit Center.

Pursuant to the National Environmental Policy Act (NEPA) and the Washington State Environmental Policy Act (SEPA), Sound Transit issued the *Lynnwood Link Extension Final Environmental Impact Statement* (FEIS) in April 2015, which covered the Lynnwood Link alignment and stations from the Northgate Mall in Seattle to the existing Lynnwood Transit Center in Lynnwood.

On April 23, 2015, the Sound Transit Board adopted Resolution 2015-05, which selected the route, profile, and stations for Lynnwood Link. This action defined the light rail alignment, profile, stations, and associated infrastructure to be built between the Northgate Transit Center and the Lynnwood Transit Center. The resolution established the NEPA Record of Decision (ROD) project definitions for the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA), issued July 10, 2015, and August 31, 2015, respectively.

Sound Transit issued a SEPA Addendum in May 2018: *SEPA Addendum to the Lynnwood Link Extension Final Environmental Impact Statement (April 2015)*. This addendum evaluated new information and project design refinements since the Final EIS was issued in 2015. Sound Transit determined that the refinements to the Project would not substantially change the analysis of impacts and alternatives in the FEIS, and would not result in new probable significant environmental impacts.

Sound Transit submitted a Pre-Application on October 21, 2016, and attended a pre-application meeting with the City on November 2, 2016. After the pre-application meeting, the City provided a written summary letter that included guidance for preparation of this final application. A pre-application update meeting was held on May 23, 2018, and the City provided further guidance for

the final application. In addition to this SUP, Sound Transit is seeking two Critical Areas Special Use Permits (CASUPs) for the Project, which will be reviewed separately.

2.1 Community Outreach

Sound Transit engages in extensive community outreach efforts to establish and maintain a positive relationship with the community, address neighborhood concerns, and provide advance notice of activities prior to construction. Sound Transit's engagement with the public regarding the Project design included a neighborhood meeting in Shoreline on November 16, 2016, followed by a second neighborhood meeting to address significant updates to the Project on June 27, 2018. The neighborhood meetings provided Shoreline residents and property owners an opportunity to review and provide feedback on the Project. Attachment C includes the Neighborhood Meeting Summary with more details of the above-described meetings. In addition to these neighborhood meetings, outreach activities conducted by Sound Transit have included:

- Individual meetings with property owners affected by the change of station design and footprint for the Shoreline South/145th Station.
- Ronald Bog Park community meeting on April 11, 2018, hosted by the City to discuss potential concepts for wetland mitigation and other trail enhancements at Ronald Bog Park.
- Individual meetings with property owners affected by new park area mitigation plans for Ridgecrest Park.
- Briefing to the Ridgecrest Neighborhood Association on May 9, 2017, hosted by Sound Transit and the City on changes to Ridgecrest Park.
- Community plant salvage event.
- Ongoing coordination with property owners for field work and neighborhood notification for certain Project-related activities.

Noticing signs will be placed in public locations to provide the public with the SUP application notice, notice of public hearing, and notice of decision, as illustrated in Attachment D, Notice Materials.

3.0 Regulatory Framework

The Project is subject to review pursuant to the City's land use code, which is administered by the City's Department of Planning and Community Development (DPCD), and other applicable agreements between Sound Transit and the City. The following sections outline the primary components of the City's review of the Project.

3.1 Development Code and Related City Ordinances

Title 20 (Development Code) of the Shoreline Municipal Code (SMC) generally establishes permitted uses and standards for development in the City. SMC 20.30.330 provides decision criteria for all special uses (SMC 20.30.330(B)), as well as those specific to a light rail transit facility/system (SMC 20.30.330(C)). The Guiding Principles for Light Rail Facility Design (adopted February 29, 2016) are referred to in SMC 20.30.330, and contain eight types of guiding principles for light rail facilities. SMC 20.40.438 establishes development standards for light rail transit systems and facilities in the City.

3.2 State Environmental Policy Act

Sound Transit is the lead agency for compliance with SEPA for the Project. In coordination with the City and other agencies with jurisdiction, Sound Transit has completed the substantive and procedural environmental review for the Project in accordance with SEPA requirements by publishing the *Lynnwood Link Extension FEIS*, which was issued by Sound Transit and FTA in April 2015, and with the *2018 SEPA Addendum to the Lynnwood Link Extension FEIS (April 2015)* issued by Sound Transit in May 2018 (described in Section 2.0). The environmental review covers the City's issuance of permits for the Project, as well as environmental mitigation, and the City will use and rely on the existing environmental documents to satisfy its SEPA responsibilities consistent with Washington Administrative Code (WAC) 197-11-600.

FTA, acting as lead federal agency under NEPA, issued its Lynnwood Link Extension ROD in July 2015 (Attachment E). FHWA, a cooperating agency under NEPA, issued its ROD for the Lynnwood Link Extension Project in August 2015. A summary of applicable mitigation measures contained in these RODs is included in Table B-1 of Attachment E.

The May 2018 SEPA Addendum includes the identification of the Ronald Bog Wetland Mitigation Site as the site selected to mitigate impacts on wetlands and buffers in the City. The May 2018 SEPA Addendum also includes a copy of the Lynnwood Link Extension: Ronald Bog Park Mitigation Project Concurrence Letter signed by the City.

3.3 Agreements

3.3.1 Transit Way Agreement

In January 2018, Sound Transit and the City executed an agreement to allow the nonexclusive use of certain City streets and rights-of-way for the Project (Transit Way Agreement). This agreement authorizes certain areas of the public rights-of-way to be designated as a Light Rail Transit Way (Attachment F).

3.3.2 Expedited Permitting and Reimbursement Agreement

The City and Sound Transit entered into the Expedited Permitting and Reimbursement Agreement between the City of Shoreline and the Central Puget Sound Regional Transit Authority for the Lynnwood Link Project (Permitting Agreement) on September 29, 2016 (Attachment G). The Permitting Agreement addresses the City and Sound Transit's cooperation on the Project, SEPA compliance, SMC compliance, coordination of plan review and permitting, and financial reimbursements, among other terms. Pursuant to WAC 197-11-600, the City and Sound Transit agreed that the Project Environmental Documents listed in the Permitting Agreement will be used by the City, unchanged, for the City's review and decisions on permit applications related to the Project. The Project Environmental Documents were supplemented by publication of the May 2018 SEPA Addendum to cover project-wide changes. The SMC authorizes modifications or additions to an issued FEIS with an addendum, as Sound Transit has done in this case. See WAC 197-11-625 (incorporated by reference in SMC 20.30.640). The Project Environmental Documents and the May 2018 SEPA Addendum provide appropriate substantive and procedural compliance pursuant to SEPA for all of the elements included in the Project; therefore, the City should include and use the May 2018 SEPA Addendum, unchanged, for its review of and decision on this Application consistent with the Permitting Agreement and WAC 197-11-600.

As provided in the Permitting Agreement, the City and Sound Transit designated representatives will schedule and facilitate regular coordination meetings between the Project designers and reviewers to evaluate and comment on Project design elements. The purpose of these regular review meetings is to keep the City's reviewers apprised of the latest developments in the design of the subject facilities, seek informal feedback or formal concurrence from the City on aspects of the Project design and its consistency with the SMC, and determine whether previously identified corrections are being adequately addressed prior to the next Design Submittal.

The Permitting Agreement provides a timeline for the City's coordinated review and comment on the following Design Submittals:

- 30% Design Development Concept Submittal
- 60% Design Development Submittal
- 90% Design Development Submittal
- 100% Construction Permitting Submittal

Since execution of the Permitting Agreement, Sound Transit's Project delivery schedule has changed. An In-Progress 90% Design Development Submittal was added, and the 90% Submittal was eliminated. While the Permitting Agreement contemplated the City's SUP review would be based on the 30% Design Submittal, the City's review of this SUP application is based on Sound Transit's In-Progress 90% Design Development Submittal for the Project. (Design submittals for the Project use reference numbers L200 and L300, which correspond to Sound Transit's construction contract designations for civil construction work within the City of Shoreline. The

L200 contract generally includes Project elements from Northgate to NE 200th Street, and L300 includes Project elements to the north of NE 200th Street.)

In addition to coordinating with City reviewers, Sound Transit also engaged with the public regarding the Project design via a neighborhood meeting in Shoreline on November 16, 2016, followed by a second neighborhood meeting to address significant updates to the Project on June 27, 2018. As required by the SMC, the neighborhood meetings provided Shoreline residents and property owners an opportunity to review and provide feedback on the Project. Attachment C, Neighborhood Meeting Summary, includes more details on the meeting. Further community outreach efforts relating to the Project are described in Section 2.1.

3.3.3 Funding and Intergovernmental Cooperative Agreement

The City and Sound Transit entered into a Funding and Intergovernmental Cooperative Agreement between the Central Puget Sound Regional Transit Authority and the City of Shoreline for the Lynnwood Link Light Rail Transit Project (Funding Agreement) on February 22, 2018 (Attachment H). The Funding Agreement addresses the following:

- The general depiction and description of street vacations proposed for the Project.
- Early permitting of certain work (clearing, grading, and utility relocations) prior to approval of the SUP.
- Funding for station access enhancements, a list of potential projects, and the policies for the use of these funds.
- Future projects for public access including nonmotorized public access to the Project, Intermodal Transit Centers and Major Bicycle Intercepts, and traffic functionality mitigation.
- Coordination of construction mitigation plans.
- Inclusion of the Ronald Bog Mitigation Project and utility undergrounding on N 155th Street.
- Cooperation between the City and Sound Transit for implementation of the Project, including dispute resolution and remedies.

4.0 Permits Required for the Project

In addition to this SUP, several other permit and approval applications will be submitted to the City and other agencies over the next several years. Table 1 presents a noncomprehensive list of other permits that Sound Transit anticipates seeking (on its own, or through its contractors) for the Project.

Table 1: Lynnwood Link Extension Permits within Shoreline

Permit Type	Description	Review Authority	Anticipated Submittal Date
Clean Water Act Section 401 Certification	Water quality certification for work within jurisdictional wetlands and ditches along the Project alignment.	Washington State Department of Ecology	Joint Aquatic Resources Permit Application (JARPA) submittal April 2018
Clean Water Act Section 404 Nationwide Permit 14	For work within jurisdictional wetlands and ditches along the Project alignment.	U.S. Army Corps of Engineers	JARPA submittal April 2018
Commercial New Construction Building Permits	For the construction of each station, garage, foundation for TPSS, and other ancillary building requiring a permit.	City of Shoreline	June 2019
Construction Noise Variances	For construction outside exempt hours along the Project alignment.	City of Shoreline	TBD (in coordination with the contractor)
Critical Areas Special Use Permit	For stream buffer modifications adjacent to McAleer Creek – a Type F anadromous stream.	City of Shoreline	June 2018
Critical Areas Special Use Permit	For critical area code modifications necessary for the Lynnwood Link Extension Wetland Mitigation and Access Enhancement Project at Ronald Bog Park.	City of Shoreline	June 2018
Demolition Permits	For the demolition of structures along the Project alignment.	City of Shoreline	July 2018
Electrical Permits	For the installation of electrical systems.	Washington State Department of Labor and Industries	TBD (by contractor)
Floodplain Development Permit	For construction of the Ronald Bog Park mitigation site and for work on N 155th Street within floodplains identified by the Federal Emergency Management Agency (FEMA).	City of Shoreline	October 2018
General National Pollutant Discharge Elimination System (NPDES)	For stormwater discharges related to construction activity to approved outfalls.	Washington State Department of Ecology	January 2018
Hydraulic Project Approval	For work within or over streams along the Project alignment.	Washington Department of Fish and Wildlife	JARPA submittal July 2018
Industrial Wastewater Discharge Permit	For wastewater discharge related to construction dewatering activities.	King County	October 2018
Industrial Waste Permit	For wastewater discharge related to construction dewatering activities.	Ronald Wastewater District	October 2018

Table 1: Lynnwood Link Extension Permits within Shoreline

Permit Type	Description	Review Authority	Anticipated Submittal Date
Wastewater Waste Permit	For wastewater discharge related to the Shoreline South/145th Station and Shoreline North/185th Station.	Ronald Wastewater District	October 2018
Industrial Waste Permit	For sewer capping activities associated with utility relocations and building demolitions.	Ronald Wastewater District	November 2018
Interpretations of the Development Code	If needed for clarity or certainty in application of the code to the Project.	City of Shoreline	As needed
Lot Line Adjustments, Lot Mergers, and Subdivisions	Needed to realize full connection credits from North City Water.	City of Shoreline	2020
Mechanical Permits	For the installation of mechanical systems.	City of Shoreline	TBD (by contractor)
Miscellaneous Structure/Retaining Wall Permits	For each structure or wall including noise walls over 6 feet, retaining walls over 4 feet or surcharged, the Kiss sculpture, and detention vaults located outside City right-of-way.	City of Shoreline	June 2019
Plumbing Permits	For the installation of plumbing systems and individual fixtures.	City of Shoreline	TBD (by contractor)
Residential Building Permits	For noise mitigation work on existing homes.	City of Shoreline	June 2019
Residential Oil Tank Decommissioning Permit	Residential oil tank decommissioning.	Shoreline Fire Department	January 2019
Right-of-Way Use Permits (Early Work)	For the relocation of utilities along the Project alignment in advance of construction for the rest of the Project.	City of Shoreline	September 2018
Right-of-Way Use Permits	For the construction of light rail and associated infrastructure along the Project alignment.	City of Shoreline	January 2019
Floodplain Development Permit (Ronald Bog Park Site)	For alternation of the floodplain at Ronald Bog Park.	City of Shoreline	TBD
Floodplain Development Permit (Twin Ponds)	For work in the floodplain associated with utility undergrounding in NE 155th.	City of Shoreline	August 2018
Right-of-Way Use Permit (Ronald Bog Park Site)	For the mitigation at Ronald Bog Park.	City of Shoreline	October 2018
Right-of-Way Use Permit (Ronald Bog Park Site)	For the sculpture relocation at Ronald Bog Park.	City of Shoreline	August 2018
Sign Permits	To allow structures visible to the public using graphics, symbols, or written copy for the purpose of advertising or identifying an establishment or organization.	City of Shoreline	Mid 2021

Table 1: Lynnwood Link Extension Permits within Shoreline

Permit Type	Description	Review Authority	Anticipated Submittal Date
Site Development Permits (Early Work)	For clearing and grading at the sites of the Shoreline South/145th Station, Shoreline North/185th Station, parking garages, and along the Project alignment, including tree removal and replacement, drainage, utility, and other site improvements.	City of Shoreline	August 2018
Site Development Permits	For construction work at the sites of the Shoreline South/145th Station, Shoreline North/185th Station, accessory parking garages, and along the Project alignment.	City of Shoreline	January 2019
Site Development Permit (Ronald Bog Park Site)	For sculpture relocation at Ronald Bog Park.	City of Shoreline	July 2018
Site Development Permit (Ronald Bog Park Site)	For critical area mitigation that will include clearing, grading, and vegetation at Ronald Bog Park.	City of Shoreline	October 2018
Street Vacation Approval	To allow the City, by legislative action, to vacate a public street or alley.	City of Shoreline	January 2019
Temporary Use Permits	If needed for temporary uses up to one year.	City of Shoreline	As Needed
Tenant Improvements Building Permits	For improvements to the Seattle Public Utilities Pump House and Shoreline Center office space.	City of Shoreline	June 2019
Water District Permits	For the replacement and construction of new water facilities.	North City Water District	May 2019

5.0 Project Description

5.1 Overview of the Lynnwood Link Extension Project

As described in Section 2.0, Lynnwood Link is the northward extension of the light rail system with 8.5 miles of new light rail extending from the Northgate Transit Center in Seattle to the Lynnwood Transit Center in Lynnwood. Construction of Lynnwood Link is expected to begin in 2019, and conclude in 2024. Revenue service is scheduled to begin in 2024, following completion of trackwork and systems testing of light rail vehicles.

5.2 Project Location and Elements

The Project extends from NE 145th Street to NE 205th Street, with 3.2 miles of light rail and two stations: Shoreline South/145th Station and Shoreline North/185th Station. The guideway will be constructed across a combination of at-grade, retained cut-and-fill, and elevated structures.

The Project will give riders a fast, frequent, and reliable connection through some of the worst traffic congestion in Washington State. This extension will include four new light rail stations from Northgate to Lynnwood, with two stations in Shoreline. Trains will arrive at the stations every 4 minutes during peak service, serving an estimated 63,000 to 74,000 riders each weekday. In addition to providing approximately 500 parking spaces at each Shoreline station garages, the station areas have been designed for safe and efficient connections with enhanced local and regional bus service to create high-quality integrated transit passenger service.

With the opening of the Lynnwood Link Extension in 2024, and Northgate Link in 2021, riders will enjoy frequent, reliable service between south Snohomish County and the University of Washington, downtown Seattle, the Eastside, the airport, and more. The Sound Transit 3 (ST3) Plan, approved in the fall of 2016, will also bring new transit options (bus, light rail, and commuter rail) throughout the region with a 116-mile light rail network with more than 80 stations serving 16 cities; an expanded and more frequent Sounder commuter rail system serving 12 cities; and Bus Rapid Transit (BRT) and Sound Transit Express buses serving 30 cities.

As shown on the City's Official Zoning Map (updated October 31, 2016), the Project will be located partially within WSDOT and City of Shoreline public rights-of-way, as well as three separate land use zones: Residential 6 dwelling units/acre (R-6), Mixed Use Residential 45-foot height (MUR-45), and Mixed Use Residential 70-foot height (MUR-70). The majority of Project construction/staging will occur near the stations and light rail corridor, but some off-site staging will occur in the City's Planned Area 3 (PA-3) zone.

The following subsections detail the primary elements of the Project. All referenced drawings are provided in Attachment I of this Application.

5.2.1 Light Rail Guideway

The plan and profile of the guideway are provided in Drawing Nos. L85-KAP110 through 124 and Drawing Nos. L90-KAP100 through -101 (Attachment I, Trackwork, Book 1 of 2).

A. Landscaping

Landscaping along the guideway, including street frontages, WSDOT right-of-way, and adjacent property boundaries, will provide an attractive and unifying design concept consisting of a variety of trees, shrubs, and groundcover. Landscaping and planting plans for the guideway are provided in Drawing Nos. N14-LPP110 through N18-LPP124 and N18-LPP100 through -LPP103 (Attachment I, Landscape, Book 2 of 2).

5.2.2 Shoreline South/145th Station and Garage

A. Station

The elevated Shoreline South/145th Station will be located on the east side of I-5 at the end of NE 148th Street. The station will include a parking garage, pick-up and drop-off area, and plaza for bus transfers, as shown in Drawing No. N15-ASP100 (Attachment I, Book 2 of 2). The station will be located within WSDOT right-of-way, a portion of NE 148th Street subject to vacation by the City, and private property located in land use zone MUR-70.

Three perimeter station entrances are proposed:

- The East Station Entry to be located on the east side of the station is accessible for cars, buses, and nonmotorized patrons from 5th Avenue NE and NE 148th Street.
- The South Station Entry to be located on the southeast side of the station, immediately north of the I-5 northbound on-ramp, is only accessible for nonmotorized patrons from 5th Avenue NE.
- The North Station Entry to be located on the north side of the station is only accessible for nonmotorized patrons from a newly-constructed shared-use pathway adjacent to 3rd Avenue NE at NE 151st Street.

These perimeter entrances lead to the station plaza where fare vending (including ORCA vending machines) will be located. From there, patrons head up to the elevated station platform approximately 29 feet above grade. Stairs, up escalators, and elevators will be provided at each station plaza entrance, with emergency exit stairs located adjacent to each entrance. Public restrooms will also be provided on the plaza level at the station. The following plans are provided in Attachment I (Architecture, Book 2 of 2): floor plans of the plaza level, including the three entrances, are shown in Drawing Nos. N15-APP200 through -203; floor plans of the elevated platform are shown in Drawing Nos. N15-APP400 through -403; and exterior elevations of the station are shown in Drawing Nos. N15-AEE100 through -107. Drawings provided in Attachment I do not reflect the most recent design changes, which include up escalators at both station

entrances. Drawings submitted as part of future building permit applications will reflect this update in design.

A public plaza (approximately 26,000 square feet) along the front of the station, extending from the North Station Entry south to the South Station Entry and turning east to the associated parking garage will provide convenient access to bus transfers, as well as the surrounding residential community and businesses. Covered and open bicycle storage, shown on drawings N15-LSP102 and N15-LSP103 (Attachment I, Landscape, Book 2 of 2), will be provided near the South Station Entry and North Station Entry. There will be pedestrian and bicycle path connections between the station and the nearby residential community. Surface-level improvements, including the previously identified plaza, are shown in Drawing No. N15-ASP100 (Attachment I, Architecture, Book 2 of 2).

Exterior lighting will be provided at each station entrance, plaza areas, and other exterior areas around each entrance to provide safety for the public and transit employees using the station, while being oriented to limit spillover.

Exterior roofing materials will have high solar-reflective index values. Adhesives, sealants, paints and coatings used as part of station design will be low in volatile organic compound (VOC) content. Exterior materials will be free of zinc, galvanized material, lead, and copper. High quality, long-lasting materials are specified to reduce replacement over time. The station maximizes daylight to reduce lighting use. Station light fixtures are high efficiency light-emitting diode (LED). High-efficiency instantaneous hot water heaters and low-flow plumbing fixtures will be specified. A minimum of 80% of non-hazardous demolition and construction waste will be recycled, reused, or repurposed.

B. Pick-up, Drop-off, and Public Gathering Space

The station area pick-up/drop-off area, north of the parking garage, will be a shared-use, pedestrian-friendly, and inviting public gathering space. It will include multifunctional bollards rather than curbs to separate cars from pedestrians, while also providing seating space. The public space will include art, landscaping, and site design combined to support a flexible public gathering space that will also function as a station pick-up/drop-off area. The site can be closed to auto traffic and used for public gatherings and special events (pick-up/drop-off users would be directed into the garage at these times). These areas will advance the City's expressed policy preference for public gathering space within the station area as described in the City's Guiding Principles for Light Rail Facility Design (Section 2a). Site plans of the station area, including the pick/drop-off area, are provided in Drawing No. N15-ASP100 (Attachment I, Architecture, Book 2 of 2).

C. Transit Center

A bus transit center will be constructed adjacent to the east side of the Shoreline South/145th Station, accessed from NE 148th Street at 5th Avenue NE. The transit center will include four active loading bays for six buses (two double bays and two single bays), seven layover spaces, and one bay for paratransit. Site plans of the station area, including the bus transit center, are provided in Drawing No. N15-ASP100 (Attachment I, Architecture, Book 2 of 2).

D. Parking Garage

The parking garage for the Shoreline South/145th Station will be located east of the station, adjacent to 5th Avenue NE, within land use zone MUR-70. The garage will have six levels containing approximately 500 parking stalls. One of the levels is designed as a daylight basement configuration and the other five levels are designed as completely above grade. The garage will be accessible to pedestrians and bicycles from 5th Avenue NE, and to vehicles from the intersection of 5th Avenue NE and NE 148th Street. From the garage, Sound Transit patrons will access the station from the public plaza, nearest the South Station Entry. A pick-up and drop-off area will be located adjacent to the garage with vehicular access from 5th Avenue NE via NE 148th Street. A site plan, including the parking garage, is provided on Drawing No. N15-ASP100, and floor plans for the garage are provided in Drawing Nos. NP15-APP200 through -702 (Attachment I, Architecture, Book 2 of 2).

Pursuant to the Lynnwood Link Extension ROD, Sound Transit will provide equivalent replacement of displaced off-street parking spaces. The North Jackson Park-and-Ride, which includes 68 parking spaces, will be removed by construction of the Project. These parking spaces will be replaced in the planned Shoreline South/145th Street Garage. Sound Transit has identified the existing parking lots at the Shoreline Unitarian Universalist Church and/or the Phillippi Presbyterian Church of Seattle on 1st Avenue NE and N 148th Street, west of I-5, as the location for temporary parking. Sound Transit will lease or rent the properties, and construction of new parking lots will not be required. Improvements including striping and signage to clearly delineate pedestrian usage will be provided.

5.2.3 Shoreline North/185th Station and Garage

A. Station

The Shoreline North/185th Station will be located on the east side of I-5 just north of NE 185th Street, and will include the station, parking garage, and associated plaza for bus transfers. The site plan is provided in Drawing No. N17-ASP100 (Attachment I, Architecture, Book 2 of 2). The station will be located partially within existing WSDOT right-of-way and the land use zone MUR-70.

Two station entrances are proposed:

1) The North Station Entry will be located on the northeast side of the station, accessible to all patrons from the parking garage, the pedestrian bridge from the bus transit center, and the pick-up/drop-off areas, and accessible to bicycles and pedestrians from a pedestrian/bicycle path on 8th Avenue NE and NE 189th Street.

2) The South Station Entry will be located on the south side of the station, accessible to all patrons from the parking garage, the bus transit center, and the pick-up/drop-off areas, and accessible to bicycles, pedestrians, and motorized vehicles from NE 185th Street.

The South Station entrance, where fare vending (including ORCA vending machines) will occur, leads down to the station platforms, approximately 20 feet below NE 185th Street. Stairs and elevators will be provided at the South Station entrance. The North Station Entrance, which will also have fare vending (including ORCA vending machines), will provide access to the northbound platform directly from the plaza area. Access to the southbound platform will be via stairs or elevators to the pedestrian overcrossing, which will connect the northbound and southbound platforms. Public restrooms will be provided on the at-grade plaza level near the north station entrance. Floor plans of the plaza and platform levels, including the two entrances, are shown in Drawing Nos. N17-APP200 through -303 (Attachment I, Architecture, Book 2 of 2).

Public plaza spaces (approximately 32,000 square feet total) are located at the South Station Entrance at NE 185th Street and 5th Avenue NE, between the station and garage, at the junction of the shared use path at the North Station Entrance, and at the corner of NE 185th Street and 8th Avenue NE. Pedestrian amenities such as benches and resting areas, public art, and colored and varied texture pathways will be provided in the public plaza areas, consistent with the City's Guiding Principles for Light Rail Facility Design. These plaza spaces will also provide convenient access to bus transfers and the surrounding residential community and businesses. Pick-up and drop-off areas will be provided on the east side of the parking garage, with vehicular access off of 8th Avenue NE. Open and covered bicycle storage (shown in drawings N17-LPP240 through 242 (Attachment I, Landscape, Book 2 of 2) will be provided near both the North Station Entry and the South Station Entry. Surface-level improvements of the station, are shown in Drawing No. N17-ASP100 (Attachment I, Architecture, Book 2 of 2). (This narrative describes the final improvements proposed. The public gathering space at the northwest corner of the NE 185th Street/8th Avenue NE intersection, as well as changes to 8th Avenue NE to include a 14-foot-wide sidewalk, are not currently shown in the drawings.)

Exterior lighting will be provided at each station entrance, plaza areas, and other exterior areas around each entrance to provide safety for the public and transit employees using the station, while being oriented to limit spillover.

Exterior roofing materials will have high solar reflective index values. Adhesives, sealants, paints and coatings used as part of station design will be low in VOCs. Exterior materials will be free of zinc, galvanized material, lead, and copper. High-quality, long-lasting materials will be specified to reduce replacement over time. The station maximizes daylight to reduce lighting use. Station light fixtures will be high-efficiency LED. High-efficiency instantaneous hot water heaters and low-flow plumbing fixtures will be specified. A minimum of 80% of non-hazardous demolition and construction waste will be recycled, reused, or repurposed.

B. Parking Garage

The parking garage for the Shoreline North/185th Station will be located on the north side of NE 185th Street between the station and 8th Avenue NE, within land use zone MUR-70. A site plan is provided in Drawing No. NP17-ASP100 (Attachment I, Architecture, Book 2 of 2) and renderings are provided in Attachment J. The garage will have two levels of parking with approximately 500 parking stalls. The top deck of the parking garage will serve as the bus transit center. Pedestrian access to the parking garage will be from the western corners of the garage adjacent to the station and from 8th Avenue NE and NE 185th Street. Vehicle access to the parking garage will be from 8th Avenue NE, at the northeast end of the garage. There will be pedestrian and bicycle connections between the garage and nearby residential community. Floor plans for the garage are provided in Drawing Nos. NP17-APP200 and NP17-APP303 (Attachment I, Architecture, Book 2 of 2).

Exterior lighting will be provided at each garage entrance, plaza areas, and other exterior areas around each entrance to provide safety for the public, while being oriented to limit spillover.

C. Transit Center

A bus transit center is proposed adjacent to and east of the Shoreline North/185th Station, on the top deck of the Shoreline North/185th Parking Garage, accessed from intersection of NE 185th Street and the realigned 5th Avenue NE. The transit center will include four active bus bays and three layover spaces along with paratransit and two transit supervisor parking spaces. Site plans of the station area, including the bus transit center, are provided in Drawing No. N17-ASP100 (Attachment I, Architecture, Book 2 of 2). Design for the transit center is not fully complete, and Sound Transit will continue working with King County Metro and Community Transit to meet their service needs, and with the City to advance the design.

5.2.4 Additional Features of Stations and Garages

A. Landscaping and Screening

Landscaping around each station and garage, including entrances, plaza areas, street frontages, and adjacent property boundaries will consist of flowering trees, shrubs, and groundcover. Landscape plant species will be a mix of native or adaptive plants to the Puget Sound region, and drought tolerant. Prior to construction, Sound Transit organizes community salvage events so that local native plants will be salvaged from construction sites. New trees at both station and garage

locations will be sited to provide shade for pedestrian plaza spaces after 5 years of growth, reducing heat island affects, and providing continuous canopy coverage in buffer planting areas.

Landscaping, planting plans, and sections for the Shoreline South/145th Station and Garage are provided in Drawing Nos. N15-LPP220 through -222, N15-LPP261 through -263, and N15-LPS201 (Attachment I, Landscape Hardscape, Book 2 of 2). Evergreen trees, in particular the western red cedar (*Thuja plicata*) or similar varieties, will be provided to emphasize the native forest-like character of the neighborhood. Buffer plantings, consistent with the SMC, will be provided along the northern edge of the Shoreline South/145th Station to screen the transit center from adjacent residential properties. The garage will be offset from the property line and screened by landscaping to soften the appearance of the parking structure. Additional planting will be provided throughout the site to enhance pedestrian spaces.

Landscaping and planting plans and sections for the Shoreline North/185th Station feature evergreen trees, in particular Douglas fir (*Pseudotsuga menziesii*) or similar varieties, to emphasize the native forest-like character of the neighborhood. Landscaping planting plans and sections for Shoreline North/185th Station are provided in Drawing Nos. N17-LPP240 through -242. (Attachment I, Landscape Hardscape, Book 2 of 2). Buffer plantings will be provided along the northern edge of the Shoreline North/185th Station to screen the parking garage and pick-up/drop-off areas from adjacent residential properties. Buffer planting will also be provided along the eastern edge of the parking garage to screen the garage from nearby residential properties. Street trees and planting strips will be provided along NE 185th Street and 8th Avenue NE near the station, and the realigned 5th Avenue NE near the garage. Additional planting will be provided throughout the site to enhance pedestrian spaces.

B. Public Art

Artwork will be an important design feature of each light rail transit station and garage. Sound Transit has commissioned artists for both light rail transit stations and parking garages under the Sound Transit Art (ST*art*) program. The artist for the Shoreline South/145th Station and Garage is Buster Simpson, a local artist based in Seattle, Washington. The artist for the Shoreline North/185th Station and Garage is Mary Lucking, an artist based in Phoenix, Arizona. Artwork within the station areas is intended to improve the appearance of the facility, give vibrancy to the public spaces, and provide a means of wayfinding for riders within the station. The artwork can also enhance safety by making patrons feel welcome and discouraging vandalism. Additional information regarding the planned public art at the Shoreline stations is provided in Section 6.2 of this document, in the Sound Transit Public Art Approach in Attachment K, and the ST*art* images from the open house in Attachment L.

C. Signage and Wayfinding

Sound Transit's approach to signage and wayfinding, as described in the *Sound Transit Customer Signage Manual* (Attachment M), is to design a convenient, comprehensive program of static signage tailored to address customer information and assist in navigating the station area and to areas of interest beyond the station. Pursuant to the Funding Agreement, Sound Transit will provide the City with $2 million per station to pay for access enhancement projects that could be used for wayfinding signage beyond the stations. Beyond signage, Sound Transit integrates wayfinding through facility design, art, materials, architectural surfaces, color, and graphics to assist persons of all abilities in finding their way and conveniently using Sound Transit services. Signage plans for the stations are provided in Drawing Nos. N15-ANP100 through -403 (Shoreline South/145th Station), and NP15-ANP201 through -702 (Shoreline South/145th Garage), in Attachment I, Book 2 of 2. (This narrative describes the final improvements proposed. The plan set submitted has not yet been updated to show the final signage design for the Shoreline North/185th Station, but it will be similar to signage at Shoreline South/145th Station and will continue to be advanced in close coordination with the City.)

D. Multimodal Access

Sound Transit has completed the L200 City of Shoreline Station Area Access Assessment Report, included in this Application as Attachment N. The report analyzes and identifies possible multimodal access improvements for the Shoreline South/145th Station and Shoreline North/185th Station, which will be planned and completed as separate projects in consultation with the City. In addition to the Access Assessment Report, the Multimodel Access Assessment and Mitigation Plan has been prepared (Attachment O) to describe project-specific access priorities pursuant to the 2018 Funding Agreement between Sound Transit and the City of Shoreline.

E. Neighborhood Traffic and Parking Management

Sound Transit will work closely with City staff and participate in a neighborhood meeting for each station to develop an action plan identifying anticipated impacts on local streets and potential mitigation strategies. The City's previously developed Neighborhood Traffic Action Plans will provide the baseline for these discussions. Sound Transit will work with the City to update the plans for current conditions and to reflect anticipated impacts and neighborhood concerns specific to station development. The updated plans will be used to inform a streamlined Neighborhood Traffic Safety Program (NTSP) process for traffic calming during project implementation.

During construction and after station opening, residents will be able to initiate a Sound Transit-specific NTSP process to address impacts occurring on local streets. The Sound Transit-specific process will be based on the City's existing NTSP guidelines and physical device implementation criteria; however, a streamlined method will be developed with residents during the joint meetings between Sound Transit and City staff to address impacts in a timely manner.

As outlined in the ROD (Attachment E), Sound Transit will work with the City to evaluate and, if necessary, implement "hide-and-ride" mitigation for both station areas. Sound Transit will inventory on-street parking around each station before and after the start of light rail revenue service, and will then determine where appropriate mitigation measures will be needed in coordination with the City. Potential parking control measures include parking meters, restricted parking signage, passenger and truck load zones, and residential parking zone programs. Sound Transit will be responsible for the cost of the parking controls for 1 year after the light rail extension begins operation. The City will be responsible for monitoring, enforcing, and maintaining the parking controls.

F. Excavation and Grading

Construction of the Shoreline South/145th Station will require approximately 1,600 cubic yards of cut and 35,000 cubic yards of fill material for grading the site. The associated parking garage will require approximately 2,600 cubic yards of cut and 2,300 cubic yards of fill.

The Shoreline North/185th Station, the portion of the light rail track that runs through the station, and the associated parking garage and transit center design is in development, and earthwork quantities will be confirmed as design proceeds. Updated grading plans will be included in the next design milestone in December 2018.

When practical and when soil and site conditions allow, Sound Transit will reuse material within the Lynnwood Link Extension projects. Sound Transit will coordinate with other Sound Transit projects and the City of Shoreline to identify potential reuse opportunities. Excavated materials not used as fill on site will be transported by truck to an approved off-site disposal site.

5.2.5 Associated Infrastructure

The Project includes associated infrastructure, which will facilitate construction and operation of the light rail, including TPSS sites and signal bungalows, as well as improvements to roadways, traffic signal and illumination systems, stormwater management facilities, and utility extensions or relocations. The primary elements of this associated infrastructure are as follows:

A. Traction and Power Substation and Signal Bungalows

A TPSS site and signal bungalow (signal house) will be located near each station. At the Shoreline South/145th Station, shown in Drawing No. N16-CRP122-123 (Attachment I, Roadway, Book 1 of 2), they are located north of the site at the intersection of NE 151st Street and 3rd Avenue NE. The TPSS and signal bungalow for the Shoreline North/185th Station, shown in Drawing No. N18-CRP142 (Attachment I, Roadway, Book 1 of 2), are both located north of the Shoreline North/185th Station, on either side of NE 189th Street, respectively.

B. Roadways, Traffic, and Illumination Systems

Proposed roadway improvements, as illustrated in Drawing Nos. N14-CRP119 through N16-CRP193, and N18-CRP100 through N18-CRP103 (Attachment I, Roadway, Book 1 of 2) will include the following:

- Upgraded pavement markings and signage for the pedestrian walkway along the east side of 1st Avenue NE between N 145th Street and N 147th Street.
- A new right-turn pocket on westbound NE 145th Street to northbound 5th Avenue NE.
- Re-channelization of 5th Avenue NE from NE 145th Street to NE 148th Street.
- A new signalized intersection on 5th Avenue NE at the I-5 northbound on-ramp intersection.
- A new signalized intersection on 5th Avenue NE at NE 148th Street.
- A new multipurpose path extension from the north side of the 145th Station to 3rd Avenue NE at NE 151st Street.
- Reconstruction of the 1st Avenue NE and NE 159th Street intersection to change from a T-intersection to a 90-degree corner, where 1st Avenue NE would no longer extend north. A multipurpose path would be constructed in place of 1st Avenue NE from NE 159th Street to NE 161st Street and into Ridgecrest Park.
- Reconstruction of the end of NE 161st Street as a cul-de-sac street-end.
- Reconstruction of the southwest intersection curb line at NE 170th Street/1st Avenue NE.
- Realignment of 1st Avenue NE from approximately NE 172nd Street to NE 174th Street/3rd Avenue NE, and construction of an adjacent shared-use path.
- A new hammerhead turnaround at NE 180th Street.
- Realignment of 5th Avenue NE east of I-5 between NE 182nd Street and NE 185th Street, and construction of a multipurpose path adjacent to the guideway from the previously mentioned NE 180th Street hammerhead street end to NE 185th Street.
- Traffic signal modifications to implement protected/permissive signal phasing for northbound and southbound left turns from Meridian Avenue North to NE 185th Street. The modifications will be implemented by the City in accordance with their agreement with King County for these services with reimbursement from Sound Transit. The reimbursement will be pursuant to the scope of work and estimated cost (by King County) in Attachment P.
- Restriping of NE 185th Street on the west side of I-5 to provide a center two-way left-turn lane at 2nd Avenue NE pursuant to the scope of work in Attachment Q.
- Reconstruction of NE 185th Street from I-5 to 8th Avenue NE.

- A new roundabout at the intersection of NE 185th Street and 8th Avenue NE.
- Widening of 8th Avenue NE from NE 185th Street along the frontage of the 185th Station and garage.
- A new hammerhead turnaround at the end of NE 189th Street and NE 195th Street.

Associated traffic improvements are provided in Drawing Nos. N14-CMP119 through N18-CMP186, N18-CMP100 through N18-CMP103, and L85-eCMP201 through L85-eCMP202 (Civil Pavement Marking and Signage); L85-eCLP119 through L85-eCLP160, L14-CLP119 through N18-CLP171 and N18-CLP102 (Roadway Illumination); and N14-TSP130 through N16-TSP172 (Traffic Signal Plans) in Attachment I, Book 1 of 2. (This narrative describes the final improvements proposed. The plan set submitted does not show the final traffic signal modifications at Meridian Avenue N to NE 185th Street, restriping of NE 185th Street, and the roundabout at the intersection of NE 185th Street and 8th Avenue NE.)

C. Stormwater Management Facilities

The design of stormwater management facilities follows general guidance provided in the Sound Transit Design Criteria Manual (DCM) Chapter 6.4 (Attachment R) related to sustainability and meets the requirements of the *2012 Stormwater Management Manual for Western Washington, as Amended in December 2014*, which is adopted by reference in SMC 13.10.200 as the City's stormwater standards.

Two major aspects of sustainability, flow control and water quality treatment, are integral to the stormwater management design of the Project. Several stormwater management facilities are proposed throughout the Project alignment to meet the requirements of onsite stormwater management, runoff treatment, and flow control, and to meet the intent of sustainable design. The design aims to keep runoff from pollution generating surfaces and non-pollution generating surfaces separate to maximum extent possible. Sound Transit-owned and operated facilities will mitigate runoff from the guideway, stations, and TPSS sites. Five separate flow-control facilities for nonpollution-generating surfaces and separate water quality facilities for pollution generating surfaces are proposed. The runoff from the guideway will not require treatment because it is not considered to be a pollution-generating surface under applicable stormwater requirements. Additional facilities are provided to meet requirements for runoff within City right-of-way.

Street improvements associated with the stations and the guideway will have flow control and water quality treatment facilities provided at the site of the improvements, as applicable based on jurisdictional standards. Currently the 185th and 145th station redesign is under development, and the design will evaluate the inclusion of low impact development (LID) facilities to the extent feasible, as determined by geotechnical analysis.

Facilities at the Shoreline South/145th Station and Shoreline North/185th Station, included in the current conceptual design for the Project, will combine drainage with Sound Transit guideway facilities to promote sustainability by minimizing the amount of land required and by abating impacts on utilities, existing vegetation, and the need for topsoil replacement.

Onsite stormwater compliance was reviewed along the entire project corridor. LID measures, such as porous pavements in parking and pedestrian areas, were evaluated for implementation dependent on where the soils and groundwater table could meet LID requirements. Based on geotechnical investigation findings and infiltration testing, there are no locations identified that are feasible for infiltration within the City of Shoreline, eliminating implementation of potential LID strategies. Onsite stormwater compliance will consist of soil amendments to meet the Post-Construction Soil Quality and Depth requirements in the Washington State Department of Ecology Stormwater Manual and sheet flow dispersion for the multiuse path where feasible. While some bioretention facilities are proposed, they do not have the ability to infiltrate which means they do not meet the requirements in the Washington State Department of Ecology Stormwater Manual for onsite stormwater.

Updated drainage plans and a drainage memorandum will be provided with the next design milestone in December 2018. This memorandum will include a detailed review of feasibility criteria for the above-described stormwater plan.

Construction contract documents for the Project will include restrictions to manage the impacts of construction, including the requirement for the contractor to prepare and submit a Stormwater Pollution Prevention Plan for approval.

D. Utilities

New utility services, including sanitary sewer, water mains, electrical, and telecommunications infrastructure will be required for each of the new light rail transit stations, parking garages, TPSSs, and signal bungalows. In addition, existing utilities will be relocated throughout the Project alignment, as appropriate, for the guideway and stations. Overhead electrical and telecommunications infrastructure along the Project alignment will be undergrounded as necessary. Proposed utilities are shown in Drawings Nos. L85-eUCP120 through L85-eUCP142 and N15-UCP121 through N18-UCP180 and N18-UCP103 (Sewer and Water) and L85-eUCP319 through L85-eUCP399 (Dry Utilities) in Attachment I, Books 1 and 2 of 2. Certificates for fire flow availability for the stations are provided in Attachment S. Certificates for sewer availability will be provided as part of a concurrent permit submittal to the City, separate from this Application.

The Project will not conflict with the Ronald Wastewater District's existing Lift Station No. 15 (LS15) overflow outfall pipe; the pipe will be protected in place.

5.3 Other Project-Related Elements

5.3.1 Critical Areas

The Project area includes certain types of critical areas including wetlands, fish and wildlife habitat conservation areas, geologic hazard areas, and flood hazard areas as defined in SMC 20.20.054, SMC 20.20.020, SMC 20.20.022, and SMC 20.20.020, respectively. Below is a summary of these critical areas, the anticipated impacts, and mitigation measures developed to address those impacts. More detailed information, including a discussion of consistency with the City of Shoreline development standards in critical areas, can be found in the City of Shoreline Critical Areas Report (Attachment T).

Two elements of the Project will be reviewed under separate CASUP applications: 1) work within the McAleer Creek stream buffer in the southeast cloverleaf of the I-5/State Route 104 (SR 104) interchange, and 2) the Ronald Bog Mitigation Site.

A. Wetlands

Eight wetlands were identified and delineated within the Project area, located primarily within the Thornton Creek subbasin. Most of these wetlands are just south of NE 155th Street. One wetland, WSH5, is located within the McAleer Creek subbasin; the wetland and adjacent buffer is entirely within the southeast I-5/SR 104 interchange cloverleaf. With the exception of Wetland WSH5 adjacent to McAleer Creek, these wetlands are rated as Category III and IV according to SMC 20.80.320.

At the time of this Application, approximately 0.346 acre of wetlands and 0.692 acre of wetland buffers will be permanently filled, primarily as a result of the at-grade guideway through the wetlands just south of NE 155th Street. Approximately 0.03 acre of wetland will be converted from forested to scrub shrub wetland, and 0.051 acre of wetland buffer will experience a functional loss. During construction, 0.361 acre of wetlands and 2.139 acres of wetland buffers will be temporarily affected.

All temporarily impacted wetlands and wetland buffers will be restored to current conditions or better using native vegetation where feasible. Restoration plans are shown in Drawing Nos. L85-eLMP200 through L85-eLMP204, L85-eLMD200 through L85-eLMD210; L85-LMP100 through L85-LMP124, L85-LMD100 through L85-LMD103, STD-LZN001, and STD-LPD100 through STD-LPD103 (Attachment I, Environmental Mitigation, Book 2 of 2).

The Project will compensate for unavoidable and permanent wetland and wetland buffer impacts in the Thornton Creek subbasin by constructing the Ronald Bog Mitigation Site at Ronald Bog Park, which is within the same subbasin as the majority of impacts. Approximately 1 acre of wetlands will be created at the park by removing existing fill material and regrading to an elevation that will support the reestablishment of wetlands. The mitigation site will also enhance existing wetlands and wetland buffers by removing invasive species and replanting with native vegetation. In accordance with federal permitting requirements, the wetland mitigation areas will be fenced

off and protected in perpetuity via a conservation easement. The Ronald Bog Mitigation Site will be reviewed by the City under a separate CASUP.

Unavoidable and permanent wetland buffer impacts within the McAleer Creek subbasin, which are limited to the southeast I-5/SR 104 interchange cloverleaf, will be mitigated on site. Since the WSH5 wetland buffer and McAleer Creek stream buffer are coincident, they are both being reviewed under a separate CASUP.

B. Fish and Wildlife Habitat Conservation Areas

Fish and wildlife habitat conservation areas include streams, wetlands, and their associated buffers. They also include state priority habitats and species, as well as areas where state or federally designated endangered, threatened, and sensitive species have a primary association. Wetlands and wetland buffers are discussed above. Streams and priority habitats are further discussed below.

Three streams are in the immediate Project area: the North Branch of Thornton Creek near Twin Ponds Park, Stream SSH4, and McAleer Creek (a Type F-Anadromous stream). Stream SSH4, McAleer Creek, and their stream buffers are located entirely within the southeast cloverleaf of the I-5/SR 104 interchange. The stream buffers and wetland buffer for WSH5 completely overlap. In addition, approximately 1 mile east of I-5, on the City of Shoreline School District Aldercrest Annex property, a small portion of stream and wetland buffer for Ballinger Creek extends into the property (Attachment U).

Federally listed threatened and endangered species documented within 300 feet of the Project area are limited to two salmonid fish species (Chinook salmon and steelhead trout) in McAleer Creek. An observation of an adult steelhead trout upstream of Twin Ponds suggests that salmonid use of Thornton Creek upstream of I-5 cannot be totally precluded. Cutthroat trout have been documented upstream of I-5 in the Shoreline portion of Thornton Creek. Portions of Twin Ponds Park and Ronald Bog Park (including the pond) are mapped as priority habitat.

Based on the Biological Assessment prepared for the *Lynnwood Link Extension FEIS*, no adverse impacts on federally listed threatened or endangered species are anticipated. Similarly, no impacts on state-listed or state priority fish species are anticipated. Based on the comparison of known fish and wildlife habitat conservation areas and the Project improvements, no impacts on priority habitats at Twin Ponds or Ronald Bog Park are anticipated. At Ronald Bog Park, the mitigation site will likely improve water quality in the pond by trapping sediment and provide a net benefit in habitat functions.

No in-water work will occur in any of the streams noted above. At the Aldercrest Annex property, the stream buffer would be protected by high visibility fencing to prevent impacts on the Ballinger Creek stream buffer. The Project will, however, result in permanent and temporary impacts on the stream buffer for McAleer Creek, which are identical to the wetland buffer impacts in the same location. These impacts will be mitigated onsite and will be reviewed by the City under a separate CASUP for McAleer Creek.

C. Flood Hazard Areas

Flood hazard areas within 200 feet of the Project area are associated with Ronald Bog pond and the North Branch of Thornton Creek. Sound Transit intends to use a portion of the Ronald Bog regulatory floodplain for wetland mitigation. Sound Transit's proposed wetland mitigation at Ronald Bog Park will consist of removing enough of the fill material adjacent to the pond to establish approximately 1 acre of emergent/scrub-shrub/forested wetlands using native vegetation. In addition, the upland around the reestablished wetland will be planted with native vegetation to establish an 85-foot wetland buffer. This wetland mitigation will provide approximately 10,319 cubic yards or 6.40 acre-feet of additional floodwater storage. Therefore, no adverse impacts on the floodplain at Ronald Bog Park are anticipated. Sound Transit will apply for a floodplain development permit to support the necessary work.

Near Twin Ponds, west of I-5, the regulatory floodplain for the North Branch of Thornton Creek extends over NE 155th Street. Sound Transit is undergrounding electrical utilities within the roadway prism, including the area of roadway that includes the floodplain. The work will consist of excavating a trench in the roadway, installing the utility duct bank, and backfilling and restoring the roadway to existing elevation. No impacts on the floodplain are anticipated as a result of this work.

D. Geologic Hazard Areas

Geologic hazard areas in the Project area include landslide hazard areas, seismic areas, and erosion hazard areas. Geologic technical memoranda for the Project area are provided as an appendix to the Critical Areas Report submitted with this SUP (Attachment T).

1. Landslide hazard areas include moderate- to high-risk landslide hazard areas (both 15 to 40% slopes and slopes greater than 40% that are less than 20 feet high when averaged over 10 vertical feet) and very high-risk landslide hazard areas (greater than 40% slopes that are greater than 20 feet high when averaged over 10 vertical feet). Moderate- to high-risk landslide hazard areas are mapped throughout the Lynnwood Link Extension corridor. Very high-risk landslide hazard areas are generally mapped in the middle of the Lynnwood Link Extension corridor, from Ridgecrest Park to about NE 170th Street, and at the north end of the corridor from about NE 190th Street to the City of Shoreline limits at SR 104.

   The Project will be designed in accordance with International Building Code (IBC), American Association of State Highway and Transportation Officials (AASHTO), and/or Sound Transit design standards, as appropriate. All landslide hazards will be mitigated by the design such that the finished Project is expected to result in no impact or improved stability in potential landslide hazard areas. In addition, vegetation cleared in these areas will primarily be replanted with native vegetation.

E. Seismic Hazard Areas

One seismic hazard area is mapped by the City of Shoreline adjacent to the Lynnwood Link Extension corridor, near the northern city limits. Based on borings taken in the vicinity of this seismic hazard area, no potentially liquefiable soils are present in this location. However, Sound Transit identified several areas of loose soil below the groundwater table as areas of potentially liquefiable soil: from Shoreline South/145th Station to NE 155th Street and from approximately NE 158th Street to NE 161st Street (just south of Ridgecrest Park).

No impacts on seismic hazard areas are anticipated. Where potentially liquefiable soils are present in the Lynnwood Link Extension corridor, these soils will be improved with ground improvements prior to construction. The Project will be designed to withstand the effects of seismic ground shaking; Sound Transit light rail standards are based on the occurrence of a rare and large seismic event.

F. Erosion Hazard Areas

Erosion hazard areas are identified as lands underlain by soil types that have been identified by the Natural Resources Conservation Service as having "severe" or "very severe" erosion hazard potential. Two potential erosion hazard areas are located in the Project alignment; one from approximately between NE 198th Street and NE 201st Street, near very high-risk landslide hazard areas, and the second from NE 160th Street to NE 167th Street. However, the King County map used for this information was generated in 1952, prior to the construction of I-5. The placement of structural fill for construction of the I-5 roadway embankment has likely changed the soil conditions, so the soil survey map is no longer accurate.

The Project includes extensive vegetation clearing, excavation, and placement of earthen embankments. A temporary erosion and sediment control plan will be developed, implemented, and monitored to address potential erosion and siltation during construction. Temporarily disturbed areas will be restored as soon as practical to minimize the risk of erosion. All erosion hazards will be mitigated by the design such that the Project is expected to result in no impact in erosion hazard areas.

5.3.2 Trees

A draft Tree Removal and Mitigation Report (Attachment V) has been prepared to provide detailed information on potential impacts on trees associated with the Lynnwood Link Extension. A final version of this report will be developed as the design progresses. An updated Project-wide Tree Inventory was completed as part of the In-Progress 90% Design Development Submittal, and is also included in Attachment V.

Approximately 497 significant trees will be removed by the Project within the City. City regulations require replacement plantings totaling 1,295 trees. Sound Transit will plant sufficient numbers of trees to meet these requirements within the City limits. Additional trees beyond the minimum required may be planted to help meet replacement requirements for the Lynnwood Link

Extension overall, and to provide screening of the guideway and other elements. Strategies for protecting and retaining other mature trees that surround the light rail line rely on planning for and enforcing the installation of robust tree protection measures during construction, as well as the use of sensitive construction methods. As the design progresses, a separate long-term tree management plan will be developed to provide detailed information on monitoring, assessing, and removing hazardous trees, as well as the process for retaining large mature trees in the vicinity of the light rail line, while reducing risks to the safe operation of the light rail system.

5.3.3 Ridgecrest Park Area Mitigation

Sound Transit proposes to acquire approximately 0.3 acres of the western edge of Ridgecrest Park adjacent to the I-5 right-of-way for the Project guideway. The Project will remove an existing berm with approximately 10 trees and the park's existing gravel parking lot. Sound Transit has a signed mitigation agreement with the City of Shoreline. This agreement includes the acquisition of private parcels for transfer to the City as parkland replacement, construction of a paved replacement parking lot, construction of a portion the City's planned multimodal trail, and various street and sidewalk improvements near the park.

5.3.4 Right-of-Way Acquisition

Sound Transit proposes to acquire approximately 107 full acquisition properties and 147 partial acquisition properties within the City. Proposed right-of-way plans are shown in Drawing Nos. L85-eRPP119 through L85-eRPP-200 and L90-eRPP100 through L90 eRPP103 and L90-eRPP138 (Attachment I, Right-of-Way, Book 1 of 2). Acquisitions for the Project also include permanent and temporary easements, needed for construction and staging, as described in Section 5.3.7.

A. Street Vacation Process

Sound Transit will initiate petitions to the City for street vacations as provided in the Funding Agreement. The street vacations are generally depicted and described in Exhibit A to the Funding Agreement (Attachment H).

B. Future Land Dedications

Sound Transit will coordinate with the City regarding compliance with the City's land dedication process requirements for land that will be dedicated to the City to facilitate construction and operation of the Project. In general, dedications would be deferred until Sound Transit obtains full control of the properties and would be handled through an arrangement with Sound Transit and the City pursuant to applicable federal, state, and local requirements.

5.3.5 Building Demolition

Sound Transit proposes to demolish approximately 52 dwelling units on 87 full acquisition properties in the City, for a total of approximately 66,840 square feet. All residents in these dwelling units will be displaced as a result of the Project. Relocation assistance will be provided consistent with Sound Transit's adopted policies to ensure that all displaced residents are afforded

all the rights and benefits allowed under federal and state law. In addition, one accessory structure on one of the 147 partial acquisition properties in the City will be demolished, totaling approximately 1,200 square feet. Refer to Attachment B for additional details on these properties.

5.3.6 Noise

A. Operational Noise

Noise impacts and mitigation measures were identified in the *Lynnwood Link Extension FEIS* and ROD. Sound Transit is further assessing noise impacts and mitigations based on recently available design details. As stated in the FEIS, Sound Transit will mitigate noise and vibration impacts in the adjacent communities associated with operation and maintenance of the light rail transit system and bus transit centers. Noise and vibration predictions for light rail operation are being performed using standard FTA methodology and compared with FTA criteria to determine impacts. For a detailed analysis conducted for the Project, refer to the L200 Noise, Vibration and Groundborne Noise Report (Attachment W). Noise mitigation in the form of acoustic panels and noise walls is being integrated with the final design of trackway structures with the goal of reducing noise impacts from light rail transit operations in communities adjacent to the Project in accordance with applicable FTA criteria. Vibration mitigation, where needed, would involve introducing resilient materials (e.g., rubber) or an alternative track slab configuration into the trackway design. In addition, light rail transit stations will be designed to reduce noise from I-5 and control reverberation so that public address announcements, including those for emergencies, can be clearly heard and focused within the station environment.

City Ordinance No. 818, which was adopted April 16, 2018, establishes noise-control requirements for certain activities and facilities within the City. This ordinance specifically exempts light rail operating noise from regulation. See SMC 9.05.060(A)(4) (exempting "[s]ounds generated by the normal operation of a light rail transit system consistent with the Federal Transit Administration guidance set forth in Transit Noise and Vibration Impact Assessment (May 2006), as amended" from the provisions of the City's noise control ordinance at any time).

B. Construction Noise

Construction noise impacts are being further assessed with respect to state and local noise ordinances as the design details are advanced. For a detailed analysis conducted for the Project, please refer to the L200 Construction Noise, Vibration and Groundborne Noise Report (Attachment X). This report will be updated with the next design milestone in December 2018. Standard mitigation, where necessary and to the extent practicable, may consist of but not be limited to portable noise barriers, temporary noise barriers (acoustic blankets on fencing), and vehicle broadband backup alarms or smart alarms to lessen impacts from construction activities outside exempt hours. Where feasible, temporary noise barriers will be installed to replace existing traffic noise walls to compensate during periods when these walls must be taken down for construction of the Project.

Pursuant to SMC 9.05.060(B), construction noise is exempt between the hours of 7:00 a.m. to 10:00 p.m., Monday through Friday, and 9:00 a.m. to 10:00 p.m. Saturday, Sunday, and holidays. Construction activity schedules, to the extent reasonable, will be structured so that noisier activity will be restricted to daytime hours, and quieter activity will be performed at night. However, some activities must be performed at night as dictated by Maintenance of Traffic requirements associated with restrictions on lane and roadway closures on adjacent I-5 freeway and other arterial roadways. These activities will be considered for localized, temporary noise control where feasible. Where necessary, variance from the City's noise code will be requested for specific work elements, subject to the City's discretionary approval.

The contractor will produce a Construction Noise and Vibration Mitigation and Monitoring Plan demonstrating onsite mitigation, monitoring, local outreach and response to community concerns. It will be the responsibility of the contractor to retain the services of an acoustic specialist to perform the detailed analyses for construction noise and vibration, and to develop the plan. The plan will be provided to the City for review prior to commencement of construction activities outside of exempt hours.

5.3.7 Associated Construction Activities

A. Maintenance of Traffic

Sound Transit proposes to control traffic during construction of the Project through a variety of methods to ensure the safety of the public and construction contractors. Detailed plans, including construction phasing and access, traffic control, and detour plans will be developed with the contractor during the latter portions of the final design process and during construction. These plans will be included in Right-of-Way Use Permit applications submitted to the City.

B. Construction Staging Areas

Because the final layout of the staging areas will be determined by the construction contractor prior to mobilization, this Application describes in general terms the kinds of construction-related activities that can be expected at the staging sites. Construction staging will be necessary over much of the total construction time, approximately 6 years. Prior to commencement of any activity on the site, necessary construction-related permits and approvals from appropriate permitting agencies will be obtained. (See Table 1 for a list of permits for the Project within the City of Shoreline). Sound Transit's selected contractors will use properties for staging and construction of the light rail facilities.

Four types of properties will be used:

- Properties adjacent to the guideway, which are acquired by Sound Transit through partial acquisitions, full acquisitions, and temporary construction easements.
- WSDOT property adjacent to the guideway, which is covered under a Temporary Construction Airspace Lease.

- Other contractor-selected private or publicly owned properties leased outside of the Project area.

Activities on these sites will include but will not be limited to site preparation, demolition, excavation and grading, material laydown areas, station and parking garage construction, field offices, and other uses required for the construction of the Project. Proposed construction staging and construction access locations and routes for the first two property types listed above are provided in Drawing Nos. L85-eCCP108-121 and L85-eCCP123 (Attachment I, Construction Staging Areas, Book 1 of 2). At the time of this Application the location of two private property leases outside the Project area are known. The first location includes King County Assessor's Tax Parcel No. 0526049039, which is owned by Seattle City Light and is located on the north side of NE 185th Street between 8th Avenue NE and 10th Avenue NE, as illustrated on Drawing No. L85-eCCP123. This property will be used as a laydown or stockpile location. The second location includes King County Assessor's Tax Parcel No. 402290-0853, which is the Shoreline School District's Aldercrest Annex parcel. This property may be used for offsite staging and as a storage yard.

Other activities that can be expected to occur with construction of the light rail facilities, as well as associated project modifications to public infrastructure (such as utilities and roadways), include (but are not limited to) the following:

- Installation of fencing and security lighting.
- Temporary construction contractor trailers/offices.
- Delivery and storage of construction materials and equipment.
- Access, egress, and storage of various types and sizes of vehicles.
- Construction worker parking.
- Changes to site egress and ingress.
- Temporary street, sidewalk, or lane closures.
- Removal of existing vegetation.
- Demolition of existing pavement.
- Demolition of buildings at approximately 87 full acquisition properties and 147 partial acquisition properties.
- Grading, excavation, and fill.
- Utility capping and relocations.
- Temporary storage areas for excavated soils.
- Removal (haul) of excavated site material.

- Installation of gravel or paved surfaces.
- Collection, storage, treatment, and discharge of construction water and/or groundwater.
- Truck wheel washing facilities.
- Construction of modifications to public roadways.
- Construction of access roadways along the guideway alignment.
- Construction of onsite station and parking garage access roadways.
- Construction of station and parking garage structures.
- Construction of aerial guideway, tail track, and structural supports.
- Construction of bus loading/unloading areas
- Final site restoration and landscaping.

Activities within these areas will occur primarily during daylight hours; however, some activities within work areas, specifically those that require lane or ramp closures on I-5, may require night work. Sound Transit will coordinate with the City regarding noise from activities that will need to occur outside of construction noise exempt hours.

C. Construction Management

Construction contract documents for the Project will include restrictions to manage the impacts of construction from activities such as hauling, night construction, road closures, and material staging. These documents include Special Conditions and technical specification sections covering, but not limited to, Temporary Facilities, Haul Routes, Traffic Control, Construction Noise, and Stormwater Pollution Prevention Plans. See Attachment E for the *Lynnwood Link Extension ROD*, which includes a summary of applicable mitigation measures (Table B-1), and Section 5.3.1 for information regarding location and protection of critical areas.

There are several locations where retaining and noise walls will be constructed along private property lines, which will require temporary construction easements. The locations of these walls are provided in Right-of-Way Drawing Nos. L85-eRPP123–125, L85-eRPP 129–134, L85-eRPP 138–139, and L85-eRPP 163 (Attachment I, Roadway, Book 1 of 2). Site-specific mitigation will be addressed in the Construction Management Plan, which will be developed by the contractor and submitted to the City for approval prior to construction. In general, the contractor will only work within the limits of the easement, temporary noise mitigation will be provided as necessary, and the easement will be restored in coordination with the landowners.

6.0 Compliance with City Criteria, Guidelines, and Development Standards

The SMC provides specific regulatory requirements for projects within the City of Shoreline. This Application addresses the Project's compliance with SMC criteria, including the Special Use – Light Rail Criteria and Guiding Principles for Light Rail Facility Design, discussed in Sections 6.1 and 6.2, respectively. Section 6.3 and 6.4 discuss the modifications and departures from Development Standards that Sound Transit is seeking for the Project pursuant to SMC 20.40.438, and Section 6.5 discusses the deviations from *City of Shoreline Engineering Development Manual* that Sound Transit is seeking for the Project. In the discussion below, the relevant language from the SMC appears in italics, and the response to each criteria or code requirement appears in bold text.

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6.1 Special Use – Light Rail Criteria - SMC 20.30.330

SMC 20.30.330 provides decision criteria for all special uses (SMC 20.30.330(B)), as well as those specific to a light rail transit facility/system (SMC 20.30.330(C)).

B. Decision Criteria, Applies to All Special Uses. A special use permit shall be granted by the City, only if the applicant demonstrates that:

1. The use will provide a public benefit or satisfy a public need of the neighborhood, district, City or region;

RESPONSE: The Project will provide public benefits for the residents of the City, as well as the region, and is an essential public facility under the Washington State Growth Management Act. The Project is part of the regional Link Light Rail System, which is a critical part of a region-wide effort to meet the public need for the relief of traffic congestion in daily commutes. The Project will provide a reliable transit option between Seattle and Lynnwood by creating high-capacity light rail consistent with local, state and federal policy directives for these essential public facilities. In addition, both the Shoreline South/145th Station and Shoreline North/185th Station will promote strong multimodal connections between light rail, high capacity transit, and non-motorized circulation by providing bicycle storage, parking stalls, passenger drop-off loops, parking for shared vehicle services, and multiple pedestrian access paths to each station, all of which will benefit and address the transit needs of the public.

2. The characteristics of the special use will be compatible with the types of uses permitted in surrounding areas;

RESPONSE: The Project will be located partially within WSDOT and other public rights-of-way, as well as within three separate land use zones: R-6, MUR-45, and MUR-70. As discussed in Sections 2.1 and 3.3, Sound Transit developed the design of the Project in close coordination with the City and the public through multiple open houses and public comment opportunities, as part of its efforts to ensure ongoing compatibility with the types of uses permitted in areas surrounding the Project.

The areas around the Shoreline South/145th Station and Garage site and the Shoreline North/185th Station and Garage site have recently been zoned MUR-70. The Project is consistent with the City's 145th Station Subarea Plan and 185th Station Subarea Plan, as well as this zoning, which contemplated and is intended to be compatible with the Project. The Project will help create a land use, transportation, and infrastructure framework for a livable, equitable, and sustainable transit-oriented community consistent with the City's growth target. The design elements of each station and garage, as illustrated in the architectural drawings provided in Attachment I, Book 2 of 2, demonstrate the features that are incorporated into the design to ensure its compatibility with the surrounding built environment and the range of commercial and residential use types permitted in the surrounding area. (This narrative describes the final improvements proposed. The plan set

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submitted has not yet been updated to show the final the Shoreline North/185th Station and garage design.) The facades, plazas, landscaping, and site circulation areas have been scaled to accommodate patron volumes while maintaining a pedestrian-level sense of detail and texture, consistent with the surrounding uses to provide a cohesive sense of place. Both stations include public gathering space, which will serve to enhance both community and retail engagement. Further, to facilitate connection with the proposed multifamily residential development, both stations have multiple pedestrian-oriented access points oriented in all directions around the stations. Access to the Shoreline South/145th Station was designed to ensure compatibility with a future pedestrian bridge across I-5. Public art will also be implemented to enhance the appearance of the facilities when viewed from within each site or from the surrounding properties and uses (Attachment K, Public Art Approach, and Attachment L, ST*art* Images from the Open House).

The guideway and associated facilities are located primarily within the R-6 residential zone, with two small areas zoned MUR-45. These facilities are located adjacent to I-5 and are designed to integrate into an existing transportation corridor to ensure compatibility with permitted uses in the surrounding areas. This includes a guideway configuration that has been designed to be a combination of surface, elevated, and retained cut and fill depending on the specific nature of each portion of the Project alignment. In addition, these facilities have been designed for compatibility with the developed private properties in this area through the use of setbacks between the light rail facilities and these properties, construction of noise walls, and vegetative buffering to soften the appearance of the guideway. Noise walls included in the Project will use a decorative form-liner to enhance their visual appearance. Drawings of vegetative buffers to be installed along the Project alignment are provided in Drawing Nos N14-LPP110 through N18-LPP124 and N18-LPP100 through N18-LPP103 (Attachment I, Landscape, Book 2 of 2).

3. *The special use will not materially endanger the health, safety and welfare of the community;*

RESPONSE: The stations, garages, and associated plaza spaces are designed with health, safety and welfare of patrons as a primary emphasis, incorporating Crime Prevention through Environmental Design (CPTED). Ways to improve pedestrian movements at the stations were analyzed, and increased auto and bus traffic associated with the stations and garages were accounted for the in the station design. Landscape and physical delineation is used to help separate vehicle space from pedestrian environments for greater safety. Screening materials on the lowest level of the garage are designed to allow visibility into the garages while meeting Shoreline code requirements to provide landscaping around the garage perimeters. The public spaces in the garage, stations, and plazas have been developed to intentionally eliminate, to the extent possible, alcoves, blind corners, and dead-end corridors where people could hide. Proposed landscape improvements will be

specified with low planting and trees limbed up to allow for clear site lines at all intersections, access points, and pedestrian plazas.

The design of each of these elements was formulated based on best practices for light rail design with input from Sound Transit's Safety and Security personnel. The design also includes egress stairs, emergency phones, safety signage, and fire alarms, as well as fences, walls, and other barriers to reduce individuals' ability to cross the tracks.

In addition to prominent safety signage, audible alarm systems will be used at each station to reduce the chances of anyone crossing the guideway in inappropriate or unsafe locations and to prevent accidents in case that someone does access the guideway in an unsafe location. The Project includes three types of audible safety warning devices that fall under this category, each of which is designed to minimize sound levels while maintaining their effectiveness for safety purposes. Train-mounted bells will generally be sounded twice when the trains enter and exit stations. Audible and visual announcements of arrivals and departures will be made at each station. Finally, a louder horn is available to train operators for use in emergency situations. Sound Transit has met the above SUP criterion by incorporating each of the above safety features into its design and the operation of the Shoreline stations.

Sound Transit is assessing and will mitigate noise and vibration impacts in the adjacent communities associated with operation of the light rail system and park-and-ride facilities, as well as project construction. Noise and vibration predictions for light rail operation have been performed using standard FTA methodology, and compared with FTA criteria to determine impacts. For detailed analysis conducted for the Project, please refer to the L200 Noise, Vibration and Groundborne Noise Report (Attachment W) and L200 Construction Noise, Vibration and Groundborne Noise Report (Attachment X).

Operational noise mitigation in the form of acoustic panels and noise walls will be integrated with trackway structures to minimize noise impacts in communities surrounding the Project. Vibration mitigation, where needed, would involve the introduction of resilient materials (e.g., rubber) into the trackway design. In addition, light rail transit stations will be designed to reduce noise from I-5 and control reverberation so that public address announcements, including those for emergencies, can be clearly heard and focused within the station environment.

A detailed analysis of construction noise impacts under applicable standards will confirm construction impacts and mitigation measures. Mitigation, where necessary and practicable, will be conducted to lessen impacts from construction activities. Where feasible, temporary noise barriers (acoustic blankets on fencing) will be installed to replace existing traffic noise walls to compensate during periods when these walls must be taken down for construction of the Project. Construction activity schedules, to the extent possible, will be structured so that noisier activity will be restricted to daytime hours, and quieter activity will be performed at night. However, some activities must be performed at night as

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dictated by WSDOT restrictions on lane and roadway closures on I-5 and other arterial roadways. These activities will be considered for localized temporary noise control where feasible. In addition, Sound Transit will implement the mitigation measures specified in the ROD (Table B-1 of the ROD, Appendix B – Mitigation Plan), including the following:

- **Use smart backup alarms during nighttime work, or lower the alarm level or tone based on the background noise level, or switch off back-up alarms and replace with spotters.**
- **Use low-noise emissions equipment.**
- **Implement noise-deadening measures for truck loading and operations.**
- **Monitor and maintain equipment to meet noise limits.**
- **Use lined or covered storage bins, conveyors, and chutes with sound-deadening material.**
- **Use acoustic enclosures, shields, or shrouds for equipment and facilities.**
- **Install high-grade engine exhaust silencers and engine-casing sound insulation.**
- **Prohibit aboveground jack hammering and impact pile driving during nonexempt hours.**
- **Minimize the use of generators or use whisper-quiet generators to power equipment.**
- **Use movable noise barriers at the source of the construction activity.**
- **Demolish existing structures near vibration-sensitive receivers with methods that do not cause impact forces against the buildings or near them.**
- **When in close proximity to vibration sensitive receivers, limit the use of vibratory soil compactors and vibratory hammers to the allowed hours.**
- **Use oscillatory pile-casing techniques where appropriate.**
- **Avoid using variable-frequency vibratory hammers in dense residential areas, such as around the stations.**
- **Use resonance-free vibratory hammers or variable eccentric moment vibrators or other appropriate substitute for conventional vibratory hammers or pile drivers.**

The above features, in addition to the broad public benefits of enhanced transit services, are expected to significantly enhance the safety, health, and welfare of the traveling public and nearby residents.

4. *The proposed location shall not result in either the detrimental over-concentration of a particular use within the City or within the immediate area of the proposed use, unless the proposed use is deemed a public necessity;*

RESPONSE: The location of Project facilities has been developed in coordination with the City. The City has also undertaken rezoning of the areas around each station to create a higher density mixed residential and commercial environment. Given the unique nature of the Project (i.e., a single, linear transportation corridor with associated facilities), concerns about a "detrimental over-concentration of a particular use" are not applicable to the Project, which has been deemed necessary as an essential public facility under state and local laws.

5. *The special use is such that pedestrian and vehicular traffic associated with the use will not be hazardous or conflict with existing and anticipated traffic in the neighborhood;*

RESPONSE: The stations will increase both pedestrian and vehicular traffic in the vicinity of the stations, but the Project will relieve traffic congestion and safety impacts in other places throughout the region, including in Shoreline. Traffic analysis to identify mitigation measures and inform the design of access improvements was part of the *Lynnwood Link Extension FEIS*, preliminary engineering, and final design efforts, to ensure that traffic associated with the Project would not be hazardous or conflict with traffic in the vicinity of the Project area.

The *Lynnwood Link Extension FEIS* evaluated vehicular levels of service and found that four locations along arterial streets as currently existing would not meet the level of service standards identified in SMC 20.60.140(A). To mitigate potential hazards, conflicts, and congestion at these locations, Sound Transit has incorporated mitigation at the intersection of NE 145th Street and 5th Avenue NE, and at the intersection of NE 185th Street and 2nd Avenue NE as part of the Project design. For the remaining location identified in the *Lynnwood Link Extension FEIS ROD* (Attachment E), on NE 185th Street at Meridian Avenue N, Sound Transit proposes to reimburse the City of Shoreline for the cost of traffic signal modifications to be implemented under the City traffic signal maintenance contract with King County, as negotiated between Sound Transit and the City (Attachment P). Level of service analysis for NE 145th Street at 5th Avenue NE and NE 185th Street at 8th Avenue NE are summarized in the L200 Traffic Engineering Report (Attachment Y). The analysis for the remaining two locations on NE 185th Street is summarized in the *Lynnwood Link FEIS Transportation Discipline Report*. These reports, as well as further analysis carried out by Sound Transit and the City, indicate that the above measures will adequately mitigate potential hazards or conflicts with existing or anticipated traffic patterns.

In summary, for vehicular traffic, Sound Transit proposes:

- **Mitigation at two signalized intersection locations where the arterial level of service would be below Level of Service (LOS) D, as defined by the Highway Capacity Manual (signalized control delay of more than 35 to 55 seconds, and unsignalized control delay of more than 25 to 35 seconds):**

- **At the NE 145th Street and 5th Avenue NE intersection, a westbound right-turn lane and overlap phase will be constructed, as illustrated in Drawing Nos. N14-TSP130 through -132.**
- **At the NE 185th Street and Meridian Avenue N intersection, northbound and southbound protected/permissive left-turn traffic signal phasing will be implemented, by replacing two left-turn signal heads and the traffic signal controller to implement a flashing yellow arrow permissive signal phase. Sound Transit will reimburse the City for the work, which will be performed by King County, the City's traffic signal maintenance contractor (Attachment P).**

- **Mitigation at two unsignalized intersection locations where the level of service will be below LOS D:**
  - **At the NE 185th Street and 2nd Avenue NE intersection, NE 185th Street will be restriped between 1st Avenue NE and 3rd Avenue NE to provide a center two-way left-turn lane.**
  - **At the NE 185th Street and 8th Avenue NE intersection, a roundabout will be constructed. (This narrative describes the final improvements proposed. The plan set submitted has not yet been updated to show the final traffic signal modifications at Meridian Avenue N to NE 185th Street, restriping of NE 185th Street, and the traffic signal or roundabout at the intersection of NE 185th Street and 8th Avenue NE.)**
- **As outlined in the ROD, Sound Transit will work with the City to address impacts on neighborhood streets.**
  - **Through a series of joint meetings to occur before station openings, Sound Transit will work closely with City staff to engage the communities surrounding the stations to develop an action plan identifying anticipated problem areas on local streets and potential mitigation strategies. Previously developed City Neighborhood Traffic Action Plans will provide the baseline for these discussions. Action Plans will be updated for current conditions and to reflect anticipated impacts and neighborhood concerns specific to station impacts. The updated Neighborhood Traffic Action Plans will be used to inform a streamlined NTSP process for traffic calming project implementation.**

- **During construction and after station opening, residents will be able to initiate a Sound Transit-specific NTSP process to address impacts occurring on local streets. The Sound Transit-specific process will be based on the City's existing NTSP guidelines and physical device implementation criteria; however, a streamlined method will be developed with residents during the joint Sound Transit and City of Shoreline meetings to address impacts in a timely manner.**

The *Lynnwood Link Extension FEIS Transportation Technical Report* included an inventory of pedestrian facilities within a 0.50-mile radius of the Shoreline South/145th Station and Shoreline North/185th Station. Pedestrian levels of service were analyzed within 300 feet of each station, and improvements to affected sidewalks are included in the Project to provide LOS D or better. An additional assessment of pedestrian and bicycle facilities within a 0.25 mile radius of both stations has been conducted and is summarized in the L200 City of Shoreline Station Area Access Assessment Report (Attachment N).

Pursuant to the Funding Agreement (discussed above in Section 3.3.3), Sound Transit and the City identified a list of potential station access enhancement projects to be designed and constructed by the City or Sound Transit as City projects that would be eligible for reimbursement funding by Sound Transit. These projects serve to provide the City with improvements that result in enhanced access to both Shoreline stations. The Funding Agreement also allows for additional projects to be included, if both parties mutually agree that those projects meet the objective of the agreement. For more details, refer to the Multimodal Access Assessment and Mitigation Plan (Attachment O).

Additional design features already integrated into the design of the Project include providing accessible pedestrian signal push buttons and countdown pedestrian signals, and buffers for bike lanes in the vicinity of both stations. These features, the mitigation measures described above, and the broad public benefits of enhanced transit services is expected to significantly enhance the safety, health, and welfare of the traveling public, thus meeting the purpose and intent of this decision criterion.

6. *The special use will be supported by adequate public facilities or services and will not adversely affect public services to the surrounding area or conditions can be established to mitigate adverse impacts;*

RESPONSE: Public facilities and services were evaluated as part of the Lynnwood Link FEIS and were addressed in the final design for the Project. No adverse impacts on public facilities, including parks and recreational facilities, transit service, libraries, school districts, emergency service providers, or fire protection have been identified. In order to mitigate potential impacts on public utilities, the following upgrades were included in the Project:

Dry Utilities

- **Seattle City Light will upgrade power from one phase to three phase along 5th Avenue NE in order to bring three phase service along NE 152nd Street to the TPSS site at NE 152nd Street.**

Wet Utilities

- **The Project includes upgrading a portion of water main from 4-inch to 8-inch pipe to accommodate the fire hydrant on NE 161st Street, which will provide fire department connection service for the guideway.**
- **The Project includes upgrading a portion of water main from 4-inch to 8-inch pipe to accommodate the fire hydrant on NE 195th Street, which will provide fire department connection service for the guideway.**

While Sound Transit does not anticipate any other impacts on public facilities and services apart from the greatly enhanced access to public transportation, Sound Transit will continue to coordinate with the City to address any deficiencies that require mitigation.

7. *The location, size and height of buildings, structures, walls and fences, and screening vegetation for the special use shall not hinder or discourage the appropriate development or use of neighboring properties;*

RESPONSE: To ensure that the Project does not hinder or discourage appropriate development or uses in the vicinity of the Project, the location, size, and height of the Project's buildings, structures, walls, fences, and landscaping will meet the City's code requirements where practical, or Sound Transit has collaborated with the City to identify appropriate modifications or departures, neither of which are anticipated to hinder or discourage development or use of nearby properties. At the Shoreline South/145th Station, provisions have been made at the northwest corner of the site to connect with an interim and future final shared use path. This connection will also provide convenient access to future development north of the station. There are multiple pathways from 5th Avenue NE to the station that are buffered by landscaping, which create inviting connections from potential future development to the station and to the shared use public gathering/drop-off space.

At the Shoreline North/185th Station the shared use path extending north to NE 189th Street provides access to the north station plaza and entrance from future development to the north. This development could connect to the path between the station and NE 189th Street. Additionally, for the boundary between the station site and the properties to the north and east, Sound Transit elected to grade a slope rather than build a wall, specifically to ease connection of future development to the station. The inclusion of a landscaped public gathering space on the corner of NE 185th Street and 8th Avenue NE will create a more inviting connection to future development to the south and east. The addition of public gathering spaces at both stations provides public benefits for residents and businesses that will enhance the urban design character of the neighborhood. Elevations of

each station and garage are provided in Drawing Nos. N15-AEE100 through -107 (Shoreline South/145th Station), NP15-AEE101 through NP15-AEE104 (NE 145th Street Garage), N17-AEE100 through N17-AEE300 (Shoreline North/185th Station), and NP17-APP991 through NP17-APP992 (NE 185th Street Garage) in Attachment I, Book 2 of 2.

Fences will be constructed per WSDOT standard details and will meet the City's height requirements. Where required, fences in commercial or highly visible areas will be screened with vegetation or a decorative picket vertical railing type fence will be used. Plans of fences and noise walls are provided in Drawing Nos. N14-CRP119 through N16-CRP193 and N18-CRP100 through N18-CRP138 (Attachment I, Roadway, Book 1 of 2). Height information for walls is provided in Drawing Nos. L85-SWP835 through L85-SWP981 (Attachment I, Structures, Book 1 of 2). Except where modifications are requested, landscape buffers will be provided to meet the City's size and height requirements for Type I and Type II Landscape buffers, per SMC 20.50.460, and buffer plantings will be used to screen the guideway, stations, and garages from adjacent residential properties. In addition, tree plantings will be offered to affected individuals and neighborhoods in the vicinity of the Project area.

8. *The special use is not in conflict with the basic purposes of this title; and*

RESPONSE: The Project conforms, where applicable, to the objective requirements of the SMC, except where modifications or departures are requested by Sound Transit. As discussed in the following sections, these requests are the result of collaborative efforts between Sound Transit and the City to identify modifications or departures that are consistent with the spirit and intent of the SMC. Further, as discussed above, the Project is consistent with local, state, and Federal codes and policies favoring the development and operation of high-capacity regional transit systems.

9. *The special use is not in conflict with the standards of the critical areas regulations, Chapter 20.80 SMC, Critical Areas, or Shoreline Master Plan, SMC Title 20, Division II.*

RESPONSE: Sound Transit has designed the Project for consistency with the City's critical area regulations, and will seek the following approvals:

- **Two Critical Areas Special Use Permits (Ronald Bog Mitigation Site and McAleer Creek)**
- **Two Floodplain Development Permits**
- **Construction Permits**

Wetlands, fish, and wildlife habitat conservation areas, geologic hazard areas, and flood hazard areas will be altered as a result of the Project. A summary of the Project's consistency with the critical areas development standards is provided below. More detailed information is provided in the Critical Areas Report (Attachment T).

During Project development, Sound Transit evaluated a range of alignment alternatives that are documented in the Final EIS. Once the Sound Transit Board of Directors selected the project to build, preliminary engineering and final design efforts further evaluated avoidance and minimization measures to reduce impacts on sensitive areas within the City, including streams, Category II, III, and IV wetlands, and their associated buffers. As a result, permanent impacts on wetlands and buffers were further reduced from the potential impacts evaluated in the Final EIS.

Sound Transit proposes to compensate for the unavoidable loss of acreage and functions and values of wetlands and buffers in the Thornton Creek subbasin of Shoreline by constructing the Ronald Bog Wetland Mitigation Site at Ronald Bog Park. Given the amount of mitigation needed to meet City, state, and federal regulatory requirements, opportunities for onsite mitigation were inadequate, constrained primarily by parcel size and the presence of existing wetlands. Following a wetland mitigation site screening process and coordination with the City of Shoreline Parks, Recreation and Cultural Services Department, Ronald Bog Park was identified as the most feasible site. Although it is not in the Project area, Ronald Bog Park is the best option for meeting SMC requirements for wetland and buffer mitigation based on best available science. It was also deemed the best option by the Washington State Department of Ecology and U.S. Army Corps of Engineers.

The Ronald Bog Wetland Mitigation Site will accommodate offsite mitigation within the same subbasin and will fully compensate for the loss of acreage and functions by 1) creating approximately 1 acre of wetland, 2) enhancing existing wetlands and buffers by removing fill material and invasive species, and 3) replanting all wetland/wetland buffer areas with native vegetation. Sound Transit's mitigation performance standards for the site meet the requirements set forth in SMC 20.80.082. Construction of the mitigation site is part of Sound Transit's Early Work construction bid package, which means that construction of the mitigation site will generally begin at the start of light rail construction and be completed well in advance of the end of light rail construction. To complete the proposed work at the mitigation site, Sound Transit is seeking relief from certain critical area standards that will be addressed through the application for the Ronald Bog Mitigation Site Critical Areas Special Use Permit.

Alteration of fish and wildlife habitat conservation areas and their buffers is limited to construction of the elevated guideway in the McAleer Creek stream buffer, and is subject to Critical Areas Special Use review. During preliminary engineering and final design, reasonable measures have been taken to avoid or minimize impacts on wetlands, streams, and buffers within the southeast quadrant of the I-5/SR 104 interchange. Through design, Sound Transit avoided impacts on McAleer Creek, but impacts on the stream buffer are unavoidable. These unavoidable impacts and the mitigation for those impacts will be addressed through the application for the McAleer Creek Critical Areas Special Use Permit. Since complete avoidance is not feasible, application of the City's critical areas

regulations will unreasonably restrict Sound Transit's ability to provide public transportation benefits to the public.

Permanent and temporary impacts on the stream buffer will be mitigated onsite within the I-5/SR 104 interchange loop through extensive replanting of native vegetation, infill planting in areas not affected, and enhancement of portions of stream buffer by removal of invasive species. With these measures, the Project does not pose an unreasonable threat to the public health, safety, or welfare, or to the environment on- or off-property.

For the alteration of moderate to high risk landslide areas and very high risk landslide areas, qualified professionals have determined that the Project will not increase the risk of damage or risk of potential landslides, and will not decrease the factor of safety for landslide occurrences. The stability analyses completed for the slopes along the alignment indicate that the Project does not decrease the post construction stability on or adjacent to the light rail alignment. The Project is being designed in accordance with the International Building Code (IBC), American Association of Station Highway and Transportation Officials (AASHTO), and Sound Transit design standards. Project elements such as elevated guideway shaft foundations, retaining walls, ground improvements, and structural fills will be designed to appropriate factors of safety to maintain slope stability. All potential landslide hazards will be mitigated by the design such that the finished Project will result in no impact or result in improved stability. Where vegetation is cleared in landslide hazard areas during construction, Sound Transit will plant native vegetation, unless otherwise prohibited by WSDOT, and restore those areas to preconstruction conditions or better.

Development within designated flood hazard areas will comply with SMC 13.12, Floodplain Management. Development standards in flood hazard areas will be addressed in the applications for a Floodplain Development Permits. One Floodplain Development Permit is being sought for the excavation of existing fill material in the floodplain of Ronald Bog pond to construct the Ronald Bog Wetland Mitigation Site. This excavation will increase the storage capacity of the floodplain. A separate Floodplain Development Permit is required for the relocation of utilities within the roadway prism of NE 155th Street, near Twin Ponds Park, where the floodplain of the North Branch of Thornton Creek extends over the roadway. After digging a trench in the roadway and installing a duct bank underground, the roadway will be restored to its current elevation.

C. Decision Criteria (Light Rail Transit Facility/System Only). In addition to the criteria in subsection B of this section, a special use permit for a light rail transit system/facilities located anywhere in the City may be granted by the City only if the applicant demonstrates the following standards are met:

1. The proposed light rail transit system/facilities uses energy efficient and environmentally sustainable architecture and site design consistent with the City's guiding principles for light rail system/facilities and Sound Transit's design

criteria manual used for all light rail transit facilities throughout the system and provides equitable features for all proposed light rail transit system/facilities;

RESPONSE: Consistent with Sound Transit's commitment to environmentally sustainable construction and operation of its entire system, the Project will meet this decision criterion. The American Public Transportation Association awarded Sound Transit "Platinum" signatory status level for its commitment to sustainability, and Sound Transit continues to advance the agency's work by focusing its efforts in capital projects, including:

- **Incorporating sustainability strategies into early planning processes.**
- **Integrating sustainable design into major capital projects, as required in the Sound Transit DCM Chapter 30: Sustainability, checklist requirements (Attachment R).**
- **Enhancing "best practices" for sustainable construction to address pollutants, greenhouse gas emissions, and protection of nearby ecologically significant areas.**

Sound Transit maintains an internationally certified (ISO 14001) Environmental and Sustainability Management System to be accountable for controlling any environmental impacts, maintaining environmental compliance, and demonstrating improvements in performance.

As a light rail facility that is part of the regional transit system, the Project is inherently a key component of providing a sustainable alternative to single occupancy vehicle travel in the City and the region. The Project will enhance accessibility and connectivity between the City and regional destinations, including connecting residents of Shoreline with jobs, retail, and entertainment in other areas, while positively affecting greenhouse gas emissions and air quality.

Sound Transit ensures equitability of sustainable design across the entire LINK system. As a means to ensure this equal dispersion, the DCM Chapter 30 Sustainability Checklist provides minimum level requirements that must be met by each station/facility, irrespective of location, to ensure a sustainable design in similar fashion to United States Green Building Council Leadership in Energy and Environmental Design (LEED) prerequisites and LEED minimum program requirements. All stations are built to the highest energy efficiency standards, are independently commissioned, provide significant alternative transportation access, rely on recycled and low-emitting materials, and incorporate LID management techniques as determined by the Western Washington requirements on LID. Regardless of a project's ability to pursue LEED Certification, these same design requirements are placed on all LINK projects that are governed by the Sound Transit DCM. As such, stations without conditioned occupiable space (which defines whether LEED certification is possible), have the same features as the LEED Certified Stations.

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The proposed light rail stations have been designed to include all required sustainability practices pursuant to Sound Transit's DCM Chapter 30 (Attachment R) that are suitable in nature for transportation facilities. The Draft Sustainability Report and the Sustainability Checklist in the appendix of the report (Attachment Z) are patterned after the LEED rating system, with a targeted equivalent certification level of "Silver", which requires 50 points by LEED Standards. Key energy efficient and environmentally sustainable features of the Project are described below.

Energy Efficient Design Strategies

Sound Transit DCM, Chapter 30 (Sustainability) requires that stations align to the City of Seattle Energy Code Amendments to the Washington State Energy Code. The Seattle Energy Code, one of the most progressive in the country, provides an average energy savings of 10% above LEED standards (LEED aligns to ASHRAE 90.1-2010). Additionally, current design of the Lynnwood Link stations has shown an anticipated energy cost savings in excess of 18%, as modeled by the design team. Through efficient building design strategies, occupancy sensors, daylight photocell sensors, and LED lighting, it is anticipated the energy use index of these stations will be significantly lower than national averages for transit facilities. Additionally, as a means to ensure these facilities operate as the design intended, Sound Transit will independently commission each station, and continuously monitor real-time energy usage through advanced energy metering software. Such strategies have shown significant savings over the life of the building. In addition to the currently designed energy efficiency measures, the garages are designed to for future compatibility with up to a 50kW solar panel system along the south or west facades. External mounts, utilizing Unistrut or equivalent hangar system, would be used on garage facades to support panels, with conduits to manage electrical conveyance; mounts are not recommended to be installed until a photovoltaic system has been designed and chosen. The garages are also designed to allow for future installation of electric vehicle charging stations. At a future point in time when/if electric vehicle charging is planned for installation at the garage, additional load calculations would be performed to determine power draw, dependent on type and level of chargers chosen. As current power draw for chargers (levels 1, 2, 3) varies significantly, it is recommended to be allocated at the time of future installation. Provisions for these future installations exceed the City's energy efficiency requirements, but advance the energy efficient and environmentally sustainable design of the Project.

Architectural Features and Building Materials

Sustainable architectural and site-design features to be incorporated range from generous daylighting and weather protection to the use of extra insulation to reduce heating and cooling loads. Exterior roofing materials will have high solar reflective index values to reduce urban heat islands.

Building materials that pose significant environmental threats will be avoided. Adhesives, sealants, paints, and coatings used as part of station design will be low in VOC content. All insulation materials integrated into the work will not contain urea formaldehyde, asbestos, or halogenated flame retardants. In addition, expanded polystyrene, spray polyurethane foam, and polyisocyanurate will not be used. The exterior finishes will not contain zinc, galvanized material, lead, or copper where exposed to rainwater or water runoff, except where required for operational systems. All products, sealants, and their manufacturing processes shall be chlorofluorocarbon- and hydrochlorofluorocarbon-free.

Energy-efficient LED lighting throughout the stations and garages will reduce energy demand, and lighting is designed so that there are no upward facing lights to reduce night sky pollution, which may otherwise affect avian species and local neighbors.

As part of material procurement, Sound Transit requires that 25% of total materials include salvaged, renewable, recycled, and/or regionally sourced items, by cost, within the design.

Site Design

Bicycle facilities and carpool spaces encourage low-carbon commuting, and the use of durable materials will minimize painting and replacement over the life of the structures. The garage designs will incorporate 5% of stalls designated for carpools.

Proposed landscape plants will be native and/or adaptable to the region and supported by a temporary, water-efficient irrigation system that could be abandoned at a later date once plants are established. The irrigation design has been specified to target at a minimum a 50% reduction in potable water use when compared to industry standard systems. Permeable green space is maximized in the site design, and trees will be used for shading over impermeable areas.

As part of site preparation, Sound Transit promotes the salvage and deconstruction of existing buildings to be demolished, in addition to landscape materials, ensuring maximum reuse of appropriate materials within the greater community. Specific to the Lynnwood Link Extension Corridor, Sound Transit has held multiple plant and hardscape salvage events in 2017 and 2018, which included salvaged items such as shrubs, grasses, and pavers that would otherwise be demolished in the development of the Project. Over the course of construction, Sound Transit also requires that a minimum 80% of total non-hazardous waste produced as a byproduct of construction be diverted from landfills. A number of materials are required to be reused, salvaged, or recycled, and 100% of the waste of these materials will be diverted from landfills. These materials include asphalt paving, asphalt roofing shingles, brick, cardboard, carpet, concrete, gypsum scrap (new construction only), metals, plastic sheet and film, and wood (unpainted and untreated).

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Equitable Features

The Project, like all of Sound Transit's facilities, will also include a number of equitable features to make the facilities accessible to all riders. Universal design principles were included in the design of the Project, allowing access to the site by all people. In addition to facilitating access to high-capacity transit for riders coming from multiple modes of transport, the facilities within the Project will be compliant with the Americans with Disabilities Act (ADA) and designed to be convenient and accessible for all riders. Sound Transit's criterion for accessibility goes beyond code minimums by including multiple accessible public areas and public pathways, as opposed to just one designated route. For example, Sound Transit will provide safety devices to accommodate its visually impaired customers throughout the stations. Each station will use tactile wayfinding provisions to assist people with disabilities, who are blind, or who have vision impairments. These include platform edges with detectable warning surfaces that meet ADA Accessibility Guidelines, tactile paths to guide users through stations, and tactile train waiting areas identifying the location of the set of center-most doors of a two-car train based on the vehicles' stopping location. These provisions begin at ticketing and continue the length of the platform. Refer to Drawing Nos. N15-LSP100 through -109 (Attachment I, Landscape Hardscape, Book 2 of 2) for the Shoreline South/145th Station and Garage hardscape plans. (This narrative describes the final improvements proposed. The hardscape design for the Shoreline North/185th Station is not currently shown in the drawings.)

The Project's consistency with the City's Guiding Principles for Light Rail Facility Design is discussed on further detail in Section 6.2 of this Application.

Stormwater Management Facilities

The design of stormwater management facilities follows general guidance provided in DCM-Chapter 6.4 (Attachment R) related to sustainability and meets the requirements of the 2014 Department of Ecology Stormwater Management Manual for Western Washington, which is adopted by reference in SMC 13.10.200 as the City's stormwater standards.

Two major aspects of sustainability, flow control and water quality treatment, are integral to the stormwater management design of the Project. Several stormwater management facilities are proposed throughout the Project alignment to meet the requirements of onsite stormwater management, runoff treatment, and flow control, and to meet the intent of sustainable design. The design aims to keep runoff from pollution generating surfaces and non-pollution generating surfaces separate to maximum extent possible. Sound Transit owned and operated facilities will mitigate runoff from the guideway, stations, and TPSS sites. Five separate flow-control facilities for non-pollution generating surfaces and separate water-quality facilities for pollution generating surfaces are proposed. The runoff from the guideway will not require treatment because it is not considered to be a pollution

generating surface under applicable stormwater requirements. Additional facilities are provided to meet requirements for runoff within City right-of-way.

Street improvements associated with the stations and the guideway will have flow control and water quality treatment facilities provided at the site of the improvements, as applicable based on jurisdictional standards. Currently, the Shoreline South/145th Station and Shoreline North/185th Station redesign is under development, and the design will evaluate the inclusion of LID facilities to the extent feasible, as determined by geotechnical analysis.

Facilities at both stations, included in the current conceptual design for the Project, will combine drainage with Sound Transit guideway facilities to promote sustainability by minimizing the amount of land required and by abating impacts on utilities, existing vegetation, and the need for topsoil replacement.

Onsite stormwater compliance was reviewed along the entire project corridor. LID measures, such as porous pavements in parking and pedestrian areas, were evaluated for implementation dependent on where the soils and groundwater table could meet LID requirements. Based on geotechnical investigation findings and infiltration testing, there are no locations identified that are feasible for infiltration within the City of Shoreline, eliminating implementation of potential LID strategies. Onsite stormwater compliance will consist of soil amendments to meet the Post-Construction Soil Quality and Depth requirements in the Department of Ecology Stormwater Manual and sheet flow dispersion for the multiuse path where feasible. While some bioretention facilities are proposed, they do not have the ability to infiltrate which means they do not meet the requirements in the Department of Ecology Stormwater Manual for onsite stormwater.

Updated drainage plans and a drainage memorandum will be provided with the next design milestone in December 2018. This memorandum will include a detailed review of feasibility criteria for the previously described stormwater plan.

Construction contract documents for the Project will include restrictions to manage the impacts of construction, including the requirement for the contractor to prepare and submit for approval a Stormwater Pollution Prevention Plan.

2. *The use will not result in, or will appropriately mitigate, adverse impacts on City infrastructure e.g., roads, sidewalks, bike lanes (as confirmed by the performance of an access assessment report or similar assessment) to ensure that the City's transportation system (motorized and nonmotorized) will be adequate to safely support the light rail transit system/facility development proposed. If capacity or infrastructure must be increased to meet the decision criteria set forth in this subsection C, then the applicant must identify a mitigation plan for funding or constructing its proportionate share of the improvements; and*

RESPONSE: As described in Section 3.2, Sound Transit has completed the substantive and procedural environmental review for the Project, which identified potential impacts on City infrastructure, efforts taken to avoid impacts, and appropriate corresponding mitigation measures for unavoidable impacts. To ensure that the City's transportation system will be adequate to safely support the Project, Sound Transit will implement the mitigation measures established in the environmental review of the Project, including the impacts identified in the *Lynnwood Link Extension FEIS* and *ROD*. The City of Shoreline Station Area Access Assessment Report (Attachment N) provides details on existing and future conditions of the City's transportation infrastructure around the stations and identifies potential improvements to be provided by Sound Transit, the City, WSDOT, King County Metro Transit, and Community Transit. Pursuant to the Funding Agreement (discussed above in Section 3.3.3), Sound Transit and the City identified a list of potential station access enhancement projects to be designed and constructed by the City or Sound Transit as City projects that would be eligible for reimbursement funding by Sound Transit. The parties anticipate that these projects will result in enhanced access to both Shoreline stations. The Funding Agreement also allows for additional projects to be included, if both parties mutually agree that those project meet the objective of the agreement. For more details, refer to the Multimodal Access Assessment and Mitigation Plan (Attachment O).

As outlined in the ROD, Sound Transit will work with the City to evaluate and, if necessary, implement "hide-and-ride" mitigation for both station areas. Sound Transit will inventory on-street parking around each station before and after the start of light rail revenue service, and will then determine where appropriate mitigation measures will be needed in coordination with the City. Potential parking control measures include parking meters, restricted parking signage, passenger and truck load zones, and residential parking zone programs. Sound Transit will be responsible for the cost of the parking controls for 1 year after the light rail extension begins operation. The City will be responsible for monitoring, enforcing, and maintaining the parking controls.

3. *The applicant demonstrates that the design of the proposed light rail transit system/facility is generally consistent with the City's guiding principles for light rail system/facilities.*

RESPONSE: The Project's compliance with this criterion is discussed in detail in Section 6.2, below.

6.2 Guiding Principles for Light Rail Facility Design

The Guiding Principles for Light Rail Facility Design (adopted by City Council February 29, 2016) contains eight types of guiding principles for light rail facilities. The decision criteria applicable to the Project require general consistency with these Guiding Principles of SMC 20.30.330(C)(3). The Project's consistency with each of these Guiding Principles is summarized in the following sections.

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1. *Multimodal – stations should be full-service transit hubs and provide great access and inviting and convenient connections for trains, buses, bikes, and pedestrians through options such as:*

    a. *Ensuring that all modes of non-motorized users can easily access the stations from both sides of I-5 and NE 185th and 145th Streets.*

RESPONSE: Both stations include facilities to promote high-quality access and inviting and convenient connections between light rail and other modes of transportation including: bike racks, bike lockers, passenger drop-off loops, and multiple shared-use paths to each station. Site plans of each station and garage area are provided in Drawing Nos. N15-ASP100 and N17-ASP100 (Attachment I, Architecture, Book 2 of 2). (This narrative describes the final improvements proposed. The plan set submitted has not yet been updated to show the final the Shoreline North/185th Station and Garage design.)

Access across I-5 for nonmotorized users to/from the Shoreline South/145th Station is provided via sidewalks on the existing NE 145th Street bridge and new sidewalks along the west side of 5th Avenue NE between the station and NE 145th Street. (This narrative describes the final improvements proposed. The plan set submitted has not yet been updated to show the planned removal of the ADA underpass beneath 145th Street at I-5 and connections to 5th Avenue.) Pedestrian crossings of 5th Avenue NE between NE 145th Street and NE 148th Street will be improved with installation of accessible curb ramps and new traffic signals at the I-5 northbound on-ramp and NE 148th Street intersections, and upgrades to accessible curb ramps and pedestrian signal equipment at the NE 145th Street intersection.

Access across I-5 for nonmotorized users to/from the Shoreline North/185th Station is provided via sidewalks along the exiting NE 185th Street Bridge. The sidewalk on the north side of NE 185th street provides a direct connection to the south station entrance. A new signalized intersection with pedestrian signals at NE 185th Street and 5th Avenue NE will provide improved access for those on the south side of NE 185th Street.

Bicycle access provisions include a shared-use path on the west side of 5th Avenue NE and a buffered bike lane on the east side of 5th Avenue NE between NE 145th Street and the station, and bike lanes on both sides of 5th Avenue in the vicinity of 148th Avenue NE. Sidewalks and buffered bike lanes will be provided on both sides of NE 185th Street from 5th Avenue NE west of I-5 and 8th Avenue NE east of I-5. Nonmotorized access from both sides of NE 145th Street and NE 185th Street will be provided to through crosswalks at signalized intersections.

Sound Transit will design and build a 14-foot-wide multiuse path connection, generally following the guideway alignment, between the north entrance of the Shoreline South/145th Station to the intersection of NE 151st Street and 3rd Avenue NE, as shown on Drawing No. N16-CRP122 (Attachment I, Roadway, Book 1 of 2). This path will connect into the

frontage improvements being constructed along Sound Transit's TPSS and signal bungalow site. This design will also meet street connection requirements in the Shoreline Engineering Development Manual Section 12.6 and is compatible with the City's future plans for a woonerf street in this area. Sound Transit has confirmed with the City that the design will accommodate this future improvement.

b. *Providing safe non-motorized access to and from the stations and garages, including consideration of a pedestrian/bicycle bridge connecting the 145th Station to the west side of I-5.*

RESPONSE: Both stations and garages have been designed with multiple safe access points for pedestrians and bikes, providing access for nonmotorized users coming from each direction. Bike storage facilities have been located near the main station entries. At the Shoreline South/145th Station, the South Station Entry and the North Station Entry are accessible for non-motorized patrons. The East Station Entry is accessible for cars, buses, and non-motorized patrons and will have signage, crosswalks, pedestrian paths, and a pick up/drop off loop to ensure nonmotorized users and vehicles are safely directed to appropriate access points. At the Shoreline North/185th Station, both the North Station Entry and South Station Entry are accessible for cars, buses, and nonmotorized patrons, and are designed with the same safety features described for the Shoreline South/145th Station. Site plans of each station and garage are provided in Drawing Nos. N15-ASP100 and N17-ASP100 (Attachment I, Architecture, Book 2 of 2). See description of pedestrian and bicycle access in the response to Guiding Principle 1(a) for more detail.

Since the City's guiding principles were approved in February 2016, the City will pursue a pedestrian/bicycle bridge (the 148th Street Nonmotorized Bridge) connecting the Shoreline South/145th Station to the west side of I-5 as a project separate from the Lynnwood Link Extension Project. Sound Transit and the City coordinated to ensure forward compatibility between the Project and the City's non-motorized trail and 148th Street Nonmotorized Bridge. The bridge will require additional coordination when the design becomes available to confirm it is compatible with the Project.

c. *Balancing the need to maximize parking spaces with the desire to expand opportunities for emerging trends such as car- and bike-sharing programs;*

RESPONSE: Both parking garages at each of the stations have approximately 500 parking stalls. The garages will include dedicated parking spaces for carpool parking and shared vehicle parking. Additionally, the number of drop-off spaces at each station has been increased from the three stalls indicated in the preliminary engineering design to four at the Shoreline South/145th Station, and five at the Shoreline North/185th Station in recognition of the increasing use of rideshare services. To further increase the use of car sharing, Sound Transit is also pursuing partnerships with carshare companies to serve riders' transportation needs getting to and from the station. The stations also include bike racks and bike lockers, conveniently located for bike commuters.

d. *Providing well-marked way-finding in the station areas, including pedestrian pathways;*

RESPONSE: Sound Transit's approach to signage and wayfinding, as described in the Sound Transit Customer Signage Manual (Attachment M), has been to design a convenient, comprehensive program of static signage tailored to address customer information and assist in navigating a complex physical environment within the station area and to areas of interest beyond the station. Pedestrian pathways are located to provide safe, direct access to station entries, garage entries, bus stops, and connect to paths beyond station limits. Pathways are sized as shared-use, accommodating a variety of users while also connecting larger public gathering spaces. Signage plans are provided in Drawing Nos. N15-ANP100 through N15-ANP403 (Shoreline South/145th Station), NP15-ANP201 through NP15-ANP702 (145th Garage) in Attachment I, Book 2 of 2. (This narrative describes the final improvements proposed. The plan set submitted has not yet been updated to show the final signage design for the Shoreline North/185th Station, but it will be similar to signage at Shoreline South/145th Station and will continue to be advanced in close coordination with the City.)

Pursuant to the Funding Agreement, Sound Transit also agreed to provide the City with up to $2 million per station to pay for station access enhancement projects, and these funds could be used for wayfinding signage beyond the station areas.

Beyond signage, Sound Transit integrates wayfinding through facility design, art, materials, architectural surfaces, color, and graphics to assist persons of all abilities in finding their way and conveniently using Sound Transit services. Station signage, paving treatments, and landscaping designs will help guide patrons to the stations and entrances. Adjacent seat walls and site furnishings are provided to guide pedestrians and are kept clear of circulation routes. Urban design patterns will reinforce primary circulation patterns, plaza areas, and station entrances. At the Shoreline South/145th Station, these patterns include swooping bands, reflecting the arching branches of the western red cedar tree, and are included in the paving patterns, reinforcing primary pedestrian circulation. At the Shoreline North/185th Station, curved benches, circular exposed aggregate surfaces and planting areas frame pathways and enhance paving patterns, highlighting pedestrian routes and open plaza spaces. Site plans of each station and garage area are provided in Drawing Nos. N15-ASP100, N17-ASP100, and NP17-ASP100 (Attachment I, Architecture, Book 2 of 2).

e. *Streamlining transfers between transit modes to minimize the frequency and locations of bus turning movements; and*

RESPONSE: Both stations will include bus transit transfer and bus layover provisions as indicated by Sound Transit Regional Express, King County Metro, and Community Transit service plan updates that represent an increase in proposed service over the preliminary design of the Project. Bus transit facilities have been located with access off of

adjacent arterial streets: 5th Avenue NE for the Shoreline South/145th Station and NE 185th Street for the Shoreline North/185th Station. Several design features have been included in the Project to streamline transfers between transit modes consistent with this criterion. For example, transit patrons transferring between bus and light rail transit modes will utilize bus bays located within the station site and in proximity to the light rail station access points, reducing walk distances that would otherwise be required if bus stops were located on adjacent streets. Layover provisions within the site facilitate bus routes that directly serve the station and transferring patrons, instead of requiring bus stops on adjacent streets.

f. Encouraging transit use through:

i. Convenient connections to Bus Rapid Transit and other transportation services;

RESPONSE: Transit use will be encouraged through convenient access to both stations and parking garages. The Shoreline South/145th Station includes four active bus bays and six layover bus bays, and the Shoreline North/185th Station includes four active bus bays and three layover bus bays, including provisions for future ST3 BRT service at the Shoreline South/145th Station and a proposed extension of Community Transit's Swift BRT service to the Shoreline North/185th Station. Site plans of each station are provided in Drawing Nos. N15-ASP100 and N17-ASP100 (Attachment I, Book 2 of 2).

ii. Electronic, dynamic signs with transit data; and

RESPONSE: Electronic variable message signs will be located in each of the entrances of the stations providing dynamic, real-time transit information. Locations of variable message signs are provided in SUP Drawing Nos. N15-ANP100 through -403 (Shoreline South/145th Station), in Attachment I, Book 2 of 2. (This narrative describes the final improvements proposed. The plan set submitted has not yet been updated to show the final signage design for the Shoreline North/185th Station, but it will be similar to signage at Shoreline South/145th Station and will continue to be advanced in close coordination with the City.)

iii. Availability of Orca cards for purchase at the stations.

RESPONSE: Each station will have ticket vending machines that sell ORCA cards in the entrances as illustrated in Drawing Nos. N15-APP201 and N17-APP201 (Attachment I, Architecture, Book 2 of 2).

2. Neighborhood Character – stations should connect to the surrounding community to encourage and enhance vibrant place-making by such means as:

a. Providing gathering places, such as plazas, that could be used for a variety of functions within the station footprint;

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RESPONSE: The stations will connect the surrounding community to essential public facilities with strong multimodal connections between light rail, bus transit, vehicular, and nonmotorized circulation. While the principal purpose of the stations is focused on meeting the needs of the operators and users of the facilities, open plaza and public gathering spaces within the station areas were incorporated into the design, as described below. These spaces could accommodate multiple uses that are complementary with transit and help the City encourage and enhance vibrant place-making.

The Shoreline South/145th Station, as shown in Drawing N15-ASP100 (Attachment I, Architecture, Book 2 of 2), is designed to facilitate pedestrian access from the north, south, and east via walkways and open plaza areas. The nature of the site and circulation lend themselves to a sequence of vibrant public spaces spread throughout the site, which are ultimately connected to a long, linear plaza east of the station. At the southeast corner of the site just north of the I-5 on-ramp on the west side of 5th Avenue NE, pedestrians and bicyclists enter the site via a wide shared-use path. This path continues west toward the station and opens out into a plaza, where bicyclists will dismount and pedestrians can continue on to the station.

The plaza continues east in front of the station, providing a continuous flow from the southeast corner of the site to the North Entry of the station with bicycle storage located under the elevated station platform. This provides convenient access for pedestrians and bicyclists arriving from the northeast corner of the site along 5th Avenue NE. In addition, the plaza serves as the primary location for bus pick-up and drop-off, providing access from the bus loop (including paratransit) into the North and South Entries of the station. The spaces under the guideway also provide sheltered areas functional both for commuter waiting and additional bicycle storage. A plaza space in the northwest corner of the site includes covered bicycle storage and accommodates a shared-use path entering the site from NE 149th Street.

An additional plaza at the Shoreline South/145th Station is located just north of the parking garage. This plaza will serve patrons parking in the garage and using the pick-up/drop-off area, who will then move south to join the pedestrians headed for the station from the southeast corner of the site. It includes multifunctional bollards, rather than curbs, to separate cars from pedestrians, with art, landscaping, and site design combined to support a flexible public gathering space that also functions as a station pick-up/drop-off area. The site can be closed to auto traffic and used for a variety of public gatherings and special functions (in which case pick-up/drop-off users would be temporarily directed to the garage). The pick-up/drop-off area will fully comply with City policies favoring more public gathering space within the station area as described in the City's Guiding Principles for Light Rail. Site plans of each station area are provided in Drawing Nos. N15-ASP100, N17-ASP100, and NP17-ASP100 (Attachment I, Architecture, Book 2 of 2).

The Shoreline North/185th Station has also been designed to facilitate a variety of access points from the community, allowing for movement, as well as gathering and waiting spaces, as shown in Drawing N17-ASP100 (Attachment I, Architecture, Book 2 of 2). Similar to the Shoreline South/145th Station, public spaces at the north and south ends of the station are connected to a linear public plaza that runs between the station and garage. From NE 185th Street, pedestrians and bicyclists can enter the site by sidewalks or new bike lanes, move north toward the station to dismount and store their bicycle in bicycle racks or lockers adjacent to the station or parking garage. The plaza adjacent to NE 185th Street acts as the "face" of the station with seating areas and landscape.

A long, linear plaza between the parking garage and station presents a visually appealing, engaging space while patrons wait for buses above, or from the adjacent platform to the west. This large space provides opportunities for gathering prior to, or after boarding. The south end is level with the middle level of the parking garage, providing direct access from the garage. Landscaping and enhanced paving is arranged to soften the edges of the garage and platform. Refer to Drawing Nos. N17-LPP240 through -242 (Attachment I, Landscape, Book 2 of 2)

Pedestrians and bicyclists can also enter the site from 8th Avenue NE, by a shared-use path that parallels 8th Avenue NE and turns west toward the north end of the parking garage. This path intersects a large, vibrant plaza accommodating bicycle storage, seating areas, and landscape. This shared-use path continues north to NE 189th Street.

At the corner of NE 185th Street and 8th Avenue NE, an additional public place is provided for community gathering and welcomes patrons arriving from the east on NE 185th Street and the adjacent pick-up/drop-off area. The space includes an open plaza area, seating, and landscape to support a variety of uses.

b. Promoting excellent design that conveys a sense of place through pedestrian scale features, façade and sound wall treatments, and complementary lighting;

RESPONSE: The design and site for the Shoreline South/145th Station and Garage must address multiple modes of transportation, from pedestrians to buses and trains, as well as multiple scales, from small elements such as bus shelters up to a large parking structure and guideway. These various modes and scales can easily result in overwhelming visual complexity and disorientation for patrons. The design approach seeks to convey a sense of place by creating commonality and standardization between similar elements to simplify and streamline the visual environment so that unique, site-specific design elements can read more clearly. Garage and building facades, materials, and colors will be unique to the station.

At the Shoreline South/145th Station, a golden yellow color is being used as the signature or accent color for the station. This is the color of daylight and sunshine, and serves to counteract the use of concrete in the construction of much of the light rail system. Patrons

approaching the station will perceive the ticketing and information kiosks, which are designed to stand out against the backdrop, aiding in wayfinding to the north and south lobbies. The secondary or background color used on larger portions of the facade is a cool slate blue-grey, which will recede in the visual field and not compete with the signature color, while providing its complement. This color represents the evening, the winter, and the cool water of the Puget Sound. Likewise, the block façade of the ancillary buildings will be expressed in several grey tones, intermingling smooth and polished faces, to provide visual interest, while also not drawing attention away from the entry kiosks. The parking garage façade features Sound Transit's standard pigmented sealer in Washington Grey, with metal panels on the ground floor and lobby levels in a similar tone, but in a metallic finish. The interplay of matte-finished concrete and reflective metal will create a similar effect to that on the ancillary building, enhancing its visual interest while not distracting from the station. To enhance the parking garage design to fit with the neighborhood character, screening that is compatible with the overall design aesthetic of the station and garage will also be incorporated on the upper levels of the east and north sides. This screening will also serve to minimize light spillage to ensure compatibility with existing and future surrounding developments.

At the Shoreline North/185th Station and Garage, façade elements are a dark green in recognition of the forested nature of the City of Shoreline. The elements with this color are the elevator towers for both the station and garage. A brighter green is used to identify the primary stair at the garage and is used in the guardrails at the south entry plaza to tie the station and garage together. For passenger wayfinding, a contrasting orange accent color is used to identify fare vending areas at the entries to the station. The same color is used along the underside of the platform canopy, which cues the rider as to which station they are arriving. The back of house building facade is a darker, neutral material to provide a distinction between the public and private spaces. The garage will use a mixture of textured concrete and perforated metal panel screening. To enhance the parking garage design to fit with the neighborhood character, screening that is compatible with the overall design aesthetic of the station and garage will also be incorporated on the upper levels of the east side. This screening will also serve to minimize light spillage to ensure compatibility with existing and future surrounding developments.

Landscape, (N15-LPP220 through N15-LPP263, N15-LPD201 through N15-LPD202, N15-LPS201, N15-220 through N15- 263, and N15- LRS201) and hardscape (N15-LSP100 through N15-LSP109, and N15-LSD100 through N15-LSD103) will add to the sense of place through the use of natural motifs and plant materials as described below. The Shoreline South/145th Station will emphasize the western red cedar with sweeping metal inlayed bands and gradients of exposed aggregate. These urban design treatments will highlight primary circulation routes, as well as open plaza spaces. This includes a curbless plaza at the pick-up/drop-off area with additional seating elements for temporary events during non-peak hours. Site lighting is included to highlight pedestrian plazas, pathways,

and underneath the guideway. Wall treatments for the retaining walls and noise walls will include form-liner patterns that are consistent along the exposed face of the WSDOT right-of-way (west facing walls), and on the interior, are unique to the Shoreline South/145th Station design. Plans of the Shoreline South/145th Station are provided in Attachment I, Book 2 of 2.

The Shoreline North/185th Station is also designed to facilitate multiple pedestrian-scale elements. Landscape (N17-LPP240 through N17-LPP242) and hardscape (N17-LSD106) will add to the sense of place through the use of natural motifs and plant materials as described below. Plans of the Shoreline North/185th Station are provided in Attachment I, Book 2 of 2. The facades, plazas, and site circulation areas have been scaled to accommodate patron volumes while maintaining a pedestrian-level sense of detail and texture. The materials used on the station are inspired by the fabric of the surrounding community with an eye toward the future and the civic character of the new station area.

Site walls, low seating walls, trees and plantings will enhance the user experience. The urban design of the Shoreline North/185th Station will highlight the Douglas fir tree, with iconic seat walls resembling fir needles and swooping textured paving. The repeating seat walls and paving patterns will provide a unified design at the station and garage. Complementary site lighting is located to highlight key pedestrian intersections and provide wayfinding. Retaining wall and sound wall treatments will include form-liner patterns that are consistent along the exposed face of the WSDOT right-of-way (west facing walls), and on the interior, are unique to the Shoreline North/185th Station design.

c. Providing common design elements between both Shoreline stations;

RESPONSE: The landscape design elements for both stations portray a common, cohesive natural character between the two Shoreline stations, while allowing some differentiations in specific plant palette and accent planting at each station. Landscape planting and hardscape drawings for each station and garage are provided in Attachment I, Book 2 of 2, Drawing Nos. N15-LSP100 through N15-LSP109 (Hardscape), N15-LSD100 through N15-LSD106 (Hardscape), N15-LPP220 through N15-LPP263 (Landscape), and N17-LPP240 through N17-LPP242 (Landscape). Planted buffers around the perimeters of the stations will include native varieties of trees, shrubs, and groundcover. This includes the native western red cedar and Douglas fir trees, which represent the character of the plants of Shoreline. These buffers provide a consistent character and transition to existing buffers, and corridor planting along the guideway within WSDOT right-of-way.

Paving materials will provide further commonalities between the two Shoreline stations, with accent areas remaining distinct to reinforce the station entrances and plaza spaces. This includes scored concrete in simple geometric patterns that transition seamlessly to the public sidewalks at both stations. Light fixtures, signage, ticket vending machines, and bicycle racks and lockers are other elements that will be common between the two stations.

Additionally, while the stations use a different platform configuration, the canopy appearance between the stations will be similar, using similar materials and form.

d. Providing landscaping that reflects Shoreline's commitment to green space and sustainability; and

RESPONSE: The landscape design includes ample green space and shows a commitment to sustainability through the use of native and/or drought-tolerant plant materials, reinforcing the natural form, structure, and character of the overall planting design. Permeable green space is maximized in the site design and used to reinforce circulation and wayfinding through the site. Landscape buffers, per the city's code are provided around the stations and garages to provide a vegetative screen, with large native trees. The landscaping is designed to balance CPTED safety components with the desired green space.

Sustainability is enhanced through drought-tolerant planting, and a low-water use irrigation system with a rain sensor and connections to a central control system for real-time monitoring for increased efficiency. Stormwater is diverted to landscaped areas or bioretention facilities where feasible, to reduce the amount of infrastructure required for treatment and storage. Underground Soil Cells are included to provide additional soil volume to large canopy trees. Maintenance and care of landscaping will employ the principles of Integrated Pest Management with the intent of limiting pesticide and herbicide use through healthy landscape practices.

Additional details are provided in the Draft Sustainability Report (Attachment Z).

e. Consider making use of areas under powerlines or trackways where feasible, including a potential trail connecting both stations (ex. City-managed public open spaces and/or trails).

RESPONSE: Sound Transit will partner with the City to identify potential opportunities for the City's future Trail Along the Rail Project alignment to the extent practical, prudent, and feasible. Potential public open space opportunities include making available, by agreement, those parcels of unused land acquired by Sound Transit for the Project that remain available after all the required elements of the Project have been accommodated, including the guideway and associated structure and retaining walls, stations, ancillary buildings (e.g., TPSS and signal bungalows), stormwater management facilities, utilities, noise walls, fences, right-of-way improvements, other elements necessary for or required by the Project, and maintenance and access to these elements, as needed, in a way that is efficient and beneficial to the Project or Sound Transit surplus property policies.

3. Sustainability – all Sound Transit development should consider sustainable and climate friendly practices such as:

a. Incorporating energy-efficient and "green building" features, including Low-Impact Development techniques for storm water management;

RESPONSE: **Consistent with Sound Transit's commitment to environmentally sustainable construction and operation of its entire system, the Project will meet this decision criterion. The American Public Transportation Association awarded Sound Transit "Platinum" signatory status level for its commitment to sustainability, and Sound Transit continues to advance the agency's work by focusing its efforts in capital projects, including:**

- **Incorporating sustainability strategies into early planning processes.**
- **Integrating sustainable design into major capital projects, as required in the Sound Transit DCM Chapter 30: Sustainability, checklist requirements (Attachment R).**
- **Enhancing "best practices" for sustainable construction to address pollutants, greenhouse gas emissions, and protection of nearby ecologically significant areas.**

Sound Transit maintains an internationally certified (ISO 14001) Environmental and Sustainability Management System to be accountable for controlling any environmental impacts, maintaining environmental compliance, and demonstrating improvements in performance.

As a light rail facility that is part of the regional transit system, the Project is inherently a key component of providing a sustainable alternative to single occupancy vehicle travel in the City and the region. The Project will enhance accessibility and connectivity between the City and regional destinations, including connecting residents of Shoreline with jobs, retail, and entertainment in other areas, while positively impacting greenhouse gas emissions and air quality.

Sound Transit ensures equitability of sustainable design across the entire LINK system. As a means to ensure this equal dispersion, the DCM Chapter 30 Sustainability Checklist provides minimum level requirements that must be met by each station/facility, irrespective of location, to ensure a sustainable design in similar fashion to LEED prerequisites and LEED minimum program requirements. All stations are built to the highest energy efficiency standards, are independently commissioned, provide significant alternative transportation access, rely on recycled and low-emitting materials, and incorporate LID management techniques as determined by the Western Washington requirements on LID. Regardless of a project's ability to pursue LEED Certification, these same design requirements are placed on all Link projects that are governed by the Sound Transit DCM. As such, stations without conditioned occupiable space (which defines whether LEED certification is possible), have the same features as the LEED Certified Stations.

The proposed light rail stations have been designed to include all required sustainability practices pursuant to Sound Transit's DCM Chapter 30 (Attachment R) that are suitable in nature for transportation facilities. The Draft Sustainability Report and the Sustainability Checklist in the appendix of the report (Attachment Z) are patterned after the LEED rating system, with a targeted equivalent certification level of "Silver", which

requires 50 points by LEED Standards. Key energy efficient and environmentally sustainable features of the Project are described below:

Energy Efficient Strategies and "Green Building" Features

Sound Transit DCM, Chapter 30 (Sustainability) requires that stations align to the City of Seattle Energy Code Amendments to the Washington State Energy Code. The Seattle Energy Code, one of the most progressive in the country, provides an average energy savings of 10% above LEED standards (LEED aligns to ASHRAE 90.1-2010). Through efficient building design strategies, occupancy sensors, daylight photocell sensors, and LED lighting, it is anticipated the energy use index of these stations will be significantly lower than national averages for transit facilities. Additionally, as a means to ensure these facilities operate as the design intended, Sound Transit will independently commission each station, and continuously monitor real-time energy usage through advanced energy metering software. Such strategies have shown significant savings over the life of the building. In addition to the currently designed energy efficiency measures, the garages are designed for future compatibility with up to a 50kW solar panel system along the south or west facades. External mounts, utilizing Unistrut or equivalent hangar system, would be used on garage facades to support panels, with conduits to manage electrical conveyance; mounts are not recommended to be installed until a photovoltaic system has been designed and chosen. The garages are also designed to allow for future installation of electric vehicle charging stations. At a future point in time when/if electric vehicle charging is planned for installation at the garage, additional load calculations would be performed to determine power draw, dependent on type and level of chargers chosen. As current power draw for chargers (levels 1, 2, 3) varies significantly, it is recommended to be allocated at the time of future installation. Provisions for these future installations exceed the City's energy efficiency requirements, but advance the energy efficient and environmentally sustainable design of the Project.

Sustainable architectural and site-design features to be incorporated range from generous daylighting and weather protection to the use of extra insulation to reduce heating and cooling loads. Exterior roofing materials will have high solar reflective index values to reduce urban heat islands.

Building materials that pose significant environmental threats are avoided. Adhesives, sealants, paints and coatings used as part of station design will be low VOC. All insulation materials integrated into the work will not contain urea formaldehyde, asbestos, nor halogenated flame retardants. In addition, expanded polystyrene, spray polyurethane foam, and polyisocyanurate will not be used. The exterior finishes will not contain zinc, galvanizing, lead, or copper where exposed to rainwater or water runoff, except where required for operational systems. All products, sealants, and their manufacturing processes shall be chlorofluorocarbon- and hydrochlorofluorocarbon-free.

Energy-efficient LED lighting throughout the stations and garages will reduce energy demand, and lighting is designed so that there are no upward facing light in order to reduce night sky pollution which may otherwise affect avian species and local neighbors.

As part of material procurement, Sound Transit requires that 25% of total materials include salvaged, renewable, recycled, and/or regionally sourced items, by cost, within the design.

To reduce energy consumption by vehicles during construction, idling will be reduced and no idle zones shall be instituted. Contractor equipment shall meet the following emissions standards set by the Environmental Protection Agency (EPA):

- **Tier 2 emissions standards and above for off-road equipment**
- **Tier 3 and above for 75% of all equipment**
- **2007 and newer models for all on-road vehicles and equipment.**

Subcontractor equipment must meet EPA Tier 2 standards and above for off-road equipment, and must be 2007 and newer models for on-road vehicles and equipment, with some exceptions for Small and Disadvantaged Business Enterprise subcontractors and low-usage equipment.

Site Design

Bicycle facilities and carpool spaces encourage low-carbon commuting, and the use of durable materials will minimize painting and replacement over the life of the structures. The garage designs will incorporate 5% of stalls designated for carpools.

Proposed landscape plants will be native and/or adaptable to the region and supported by a temporary, water-efficient irrigation system that could be abandoned at a later date once plants are established. The irrigation design has been specified to target at a minimum a 50% reduction in potable water use when compared to industry standard systems. Permeable green space is maximized in the site design, and trees will be used for shading over impermeable areas.

As part of site preparation, Sound Transit promotes the salvage and deconstruction of existing buildings to be demolished, in addition to landscape materials, ensuring maximum reuse of appropriate materials within the greater community. Specific to the Lynnwood Link Extension Corridor, Sound Transit has held multiple plant and hardscape salvage events in 2017 and 2018, which included salvaged items such as shrubs, grasses, and pavers that would otherwise be demolished in the development of the Project. Over the course of construction, Sound Transit also requires that a minimum 80% of total non-hazardous waste produced as a byproduct of construction be diverted from landfills. A number of materials are required to be reused, salvaged, or recycled, and 100% of the waste of these materials will be diverted from landfills. These materials include asphalt paving, asphalt roofing shingles, brick, cardboard, carpet, concrete, gypsum scrap (new construction only), metals, plastic sheet and film, and wood (unpainted and untreated).

Stormwater Management Facilities

The design of stormwater management facilities follows general guidance provided in Sound Transit's DCM Chapter 6.4 related to sustainability and meets the requirements of the 2014 Department of Ecology Stormwater Management Manual for Western Washington, which is adopted by reference in SMC 13.10.200 as the City's stormwater standards.

Two major aspects of sustainability, flow control and water quality treatment, are integral to the stormwater management design of the Project. Several stormwater management facilities are proposed throughout the Project alignment to meet the requirements of onsite stormwater management, runoff treatment, and flow control, and to meet the intent of sustainable design. The design aims to keep runoff from pollution generating surfaces and non-pollution generating surfaces separate to maximum extent possible. Sound Transit owned and operated facilities will mitigate runoff from the guideway, stations, and TPSS sites. Five separate flow-control facilities for non-pollution-generating surfaces and separate water-quality facilities for pollution-generating surfaces are proposed. The runoff from the guideway will not require treatment because it is not considered to be a pollution-generating surface under applicable stormwater requirements. Additional facilities are provided to meet requirements for runoff within City right-of-way.

Street improvements associated with the stations and the guideway will have flow control and water quality treatment facilities provided at the site of the improvements, as applicable based on jurisdictional standards. Currently the 185th and 145th station redesign is under development, and the design will evaluate the inclusion of LID facilities to the extent feasible, as determined by geotechnical analysis.

Facilities at the Stations, included in the current conceptual design for the Project, will combine drainage with Sound Transit guideway facilities to promote sustainability by minimizing the amount of land required and by abating impacts on utilities, existing vegetation, and the need for topsoil replacement.

Onsite stormwater compliance was reviewed along the entire project corridor. LID measures, such as porous pavements in parking and pedestrian areas, were evaluated for implementation dependent on where the soils and groundwater table could meet LID requirements. Based on geotechnical investigation findings and infiltration testing, there are no locations identified that are feasible for infiltration within the City of Shoreline, eliminating implementation of potential LID strategies. Onsite Stormwater compliance will consist of soil amendments to meet the Post-Construction Soil Quality and Depth requirements in the Department of Ecology Stormwater Manual and sheet flow dispersion for the multiuse path where feasible. While some bioretention facilities are proposed, they do not have the ability to infiltrate which means they do not meet the requirements in the Department of Ecology Stormwater Manual for onsite stormwater.

Updated drainage plans and a drainage memorandum will be provided with the next design milestone in December 2018. This memorandum will include a detailed review of feasibility criteria for the previously described stormwater plan.

Construction contract documents for the Project will include restrictions to manage the impacts of construction, including the requirement for the contractor to prepare and submit for approval a Stormwater Pollution Prevention Plan.

b. Restoring impacted streams, wetlands, and other critical areas and associated buffers;

RESPONSE: Construction of the Project is expected to temporarily impact wetlands, wetlands buffers, stream buffers, landslide hazard areas, and flood hazard areas. After construction, Sound Transit proposes to restore temporarily impacted critical areas to preconstruction conditions or better.

Restoration of wetlands, wetland buffers, and stream buffers after construction will include 1) removal of temporary fill, 2) restoring grades to pre-construction conditions, 3) lofting or loosening soils and adding soil amendments where necessary, and 4) replanting with native plant species unless otherwise provided by WSDOT standards for areas within the I-5 right-of-way. Many wetlands and buffers being impacted are currently dominated by invasive species, including Himalayan blackberry and reed canary grass. Replacing these invasive monocultures with native vegetation communities will increase the wetland and buffer functions as a result of restoration.

The Project will require clearing and other construction in moderate to high risk and very high risk landslide areas. Some of these slopes will be removed to accommodate the Project. Where they remain, these areas will be restored after construction by replanting with native plant species unless otherwise prohibited by WSDOT. In areas where the existing slope cannot be retained undisturbed with native vegetation, Sound Transit is using retaining walls or other design methods to maintain the natural slope.

Flood hazard areas temporarily impacted will be restored to existing grades or, in the case of the Ronald Bog pond floodplain, to a lower grade in order to reestablish wetlands. Lowering the grade of the Ronald Bog pond floodplain adjacent to the pond will provide an increase in flood storage capacity.

c. Providing information about the functions and values of adjacent critical areas through interpretive signage or other means; and

RESPONSE: Critical areas near the Project are predominantly within or adjacent to WSDOT right-of-way and are not accessible to the public. However, Sound Transit proposes to install three interpretive signs at strategic locations at the edge of the Ronald Bog Wetland Mitigation Site. It is anticipated that the interpretive signs will include

information on the functions and values of the wetland ecosystem, as well as information pertaining to the history of the site, which historically was a peat bog.

d. Preserving significant trees when possible.

RESPONSE: A draft Tree Removal and Mitigation Report (Attachment V) has been prepared to provide detailed information on potential impacts on trees associated with the Project. A final version of this report will be developed as the design progresses. An updated Project-wide Tree Inventory was completed as part of the In-Progress 90% Design Development Submittal, and is also included in Attachment V.

Approximately 497 significant trees will be removed within the City when the Project is constructed. City regulations require replacement plantings totaling 1,295 trees. Sound Transit will plant sufficient numbers of trees to meet these requirements within the City limits. Additional trees beyond the minimum required may be planted to help meet replacement requirements for the overall Lynnwood Link Extension Project, and to provide screening of the guideway and other Project elements. Strategies for protecting and retaining other mature trees that surround the light rail line rely on planning for and enforcing the installation of robust tree protection measures during construction, as well as the use of sensitive construction methods. For example, Sound Transit is assessing the feasibility of including a mechanically stabilized earth wall foundation in the grading design in order to preserve two Douglas fir trees at the Shoreline South/145th Station.

As design progresses, a separate long-term tree management plan will be developed to provide detailed information on monitoring, assessing, and removing hazardous trees, as well as the process for retaining large mature trees in the vicinity of the light rail line, while reducing risks to the safe operation of the light rail system.

4. Public Safety – the facilities should be safe, welcoming areas for people of all ages at all times through measures such as:

a. Limiting locations where vehicles, including buses, may cross dedicated pedestrian routes;

RESPONSE: In order to create a safe and welcoming environment for pedestrians, the layout of each station, as illustrated in Drawing Nos. N15-ASP100 and N17-ASP100 (Attachment I, Architecture, Book 2 of 2), was specifically designed to minimize pedestrian/vehicular interaction. Patrons can access the station entrances from the bus stops and passenger drop-off areas without crossing vehicular traffic.

At the Shoreline South/145th Station, both transit and general-purpose vehicles enter the site at the same location, NE 148th Street, minimizing pedestrian crossings along 5th Avenue NE. Pedestrians approaching the station from the north and south can enter the site without crossing the vehicular entrance. The one roadway pedestrian crossing within

the site, across the garage entrance road, is located to provide adequate space for vehicles to see pedestrians and stop.

At the Shoreline North/185th Station, pedestrian access from the parking garage to the station is free of pedestrian/vehicular crossings. Signalized pedestrian crosswalks are provided at the transit-only access road on NE 185th Street. Patrons accessing the station from the drop-off loop can get to the station entrances with a single crossing either at the signalized intersection of 5th Avenue NE and NE 185th street where bus traffic enters the transit loop or where vehicle traffic enters the garage off of 8th Avenue NE. Patrons arriving by King County Metro Transit buses will be dropped off on a center island in the transit plaza, and will then walk to the station via well-marked crosswalks that only cross slow speed bus traffic within the transit loop. The higher volume Community Transit Swift bus platforms are placed so that bus transit patrons accessing the Swift platforms will not cross the transit loop. All bus patrons will access the station either by the dedicated pedestrian bridge on the north end of the station, or via the pedestrian path on the south end of the station without crossing additional vehicle traffic.

b. *Integration of Crime Prevention Through Environmental Design (CPTED) at all facilities;*

RESPONSE: Implementation of CPTED has been ongoing in the design development of the station and garages. As discussed, above, the Project design includes lighting, elimination of alcoves and hidden/dark spaces, transparent screening and glazing, and ensuring clear sightlines around station areas. In addition, the design seeks balance between providing ample landscape buffers with CPTED design by including low-growing plant material in specified areas to maintain clear sight lines of pedestrian spaces and circulation routes. Sound Transit will comply with FTA guidance for security design, according to the FTA Transit Security Design Considerations, Final Report November 2004.

c. *Security cameras (monitored) and emergency call-boxes;*

RESPONSE: Several security and emergency features will be present throughout each station and garage. Closed circuit television cameras will be located in each station at the lobbies, platform canopies, plazas, bicycle storage areas, and in the parking garage's public areas, parking areas, vehicle and pedestrian entries and exits to the site, and the structure and garage perimeter. An Emergency Telephone System, as required by National Fire Protection Association 130 and the DCM, will be located at each end of station platforms, in rooms housing the uninterruptible power supply, communications, sprinkler valve, elevator machine, fire control, and in the parking garages. Passenger Emergency Telephones will be located in the station at fare vending areas, bicycle storage areas, within 5 feet of exit stairs at each level, at each elevator lobby and in elevator cars, and within 300 feet of any location in the public areas of the station. Plan drawings illustrating the

locations of these features are provided in Drawing No. N15-AAP001 (Attachment I, Architecture, Book 2 of 2).

d. Station designs that are as open as possible with maximum use of transparent panels; and

RESPONSE: The design of each station and garage maximizes open design with the use of glass and transparency at entrances, elevators, platform level windscreens, and other areas. At the Shoreline South/145th Station, the stair/escalator enclosure below the platform uses a perforated panel enclosure that allows visibility into the stair escalator. Above the platform, the windscreens around the stair/escalator are glass. The station entrances are open to the east, facilitating clear sight lines into the entry areas. A linear open plaza extends between the north and south station entrances. At the Shoreline North/185th Station, the south plaza, stairs, and north pedestrian crossing utilize glazing to promote light and visibility, while providing protection from the wind and rain. The windscreens along the side platforms are transparent as well. Both garages utilize perforated panel screening on the lowest level and public stairs to allow the garage to be secured while still promoting light and visibility into the structure. Alcoves and places of potential concealment are minimized. Façades of the facilities are shown in Drawing Nos. N15-AEE100 through N15-AEE-107 (Shoreline South/145th Station) and NP15-AEE101 through NP15-AEE105 (NE 145th Street Garage) in Attachment I, Book 2 of 2. (This narrative describes the final improvements proposed. The plan set submitted has not yet been updated to show the final Shoreline North/185th Station and garage design.)

e. Lighting that enhances safety, but is non-intrusive for neighbors.

RESPONSE: Illumination levels are designed in accordance with Chapter 21 of Sound Transit's DCM (Attachment R) to enhance patron safety and create a secure environment throughout the site, garage, and station. Site lighting will employ neighborhood friendly optic fixtures and be positioned to minimize light spillage onto adjacent properties. When needed, the use of motion sensors or other lighting technology will be used to limit light spillage. Lighting levels that will be generated at the Shoreline South/145th Station and Garage, and at the Shoreline North/185th Station, are described in further detail in Section 6.4. Exhibits discussed below in Section 6.4 (Exhibit 4 of Attachment BB) of this Application show the details of the proposed fixtures.

5. *Mobility – stations should provide accommodations for people of all ages and abilities including:*
   a. Providing accommodations for people with mobility challenges;
   b. Access to allow easy mobility for those with strollers and/or luggage;
   c. Providing disabled parking and drop-off zones; and
   d. Constructing safe, ADA-compliant, wide walking paths, sidewalks and curb ramps (non-slip).

REVISION
March 18, 2019
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RESPONSE: The Project, like all of Sound Transit's facilities, will include a number of equitable features to make the facilities accessible to all riders. Universal design principles were included in the design of the Project, allowing access to the site by all people. Both stations are designed to provide equitable access, accommodation for those with mobility challenges, and easy navigation by individuals with strollers, or luggage.

The facilities within the Project will be compliant with the ADA and designed to be convenient and accessible for all riders. Sound Transit's criteria for accessibility go beyond code minimums by including multiple accessible public areas and public pathways, as opposed to just one designated route. For example, Sound Transit will provide safety devices to accommodate its visually impaired customers throughout the stations. Each station will use tactile wayfinding provisions to assist people with disabilities or who have vision impairments. These include platform edges with detectable warning surfaces that meet ADA Accessibility Guidelines, tactile paths to guide users through stations, and tactile train waiting areas identifying the location of the set of center-most doors of a two-car train based on the vehicles' stopping location. These provisions begin at ticketing and continue the length of the platform. Refer to Drawing Nos. N15-LSP100 through -109 (Attachment I, Landscape Hardscape, Book 2 of 2) for the Shoreline South/145th Station and Garage hardscape plans. (This narrative describes the final improvements proposed. The hardscape design for the Shoreline North/185th Station is not currently shown in the drawings.)

Each station includes ADA-compliant parking and drop-off areas. Paths around the stations meet or exceed ADA requirements, including wide walking paths, sidewalks, and non-slip curb ramps. The Project was also designed to keep grades as low as possible to facilitate accessibility. Site plans of each station and garage area are provided in Drawing Nos. N15-ASP100 and N17-ASP100 (Attachment I, Architecture, Book 2 of 2). (This narrative describes the final improvements proposed. The plan set submitted has not yet been updated to show the final design of the NE 185th Street Garage.)

All stations also include elevator access to the station platforms and all levels of the garages. The elevators are located along the main travel paths, to be quickly accessed after purchasing fare. At the Shoreline North/185th Station, patrons using the pedestrian bridge between the transit loop and north station entrance will have direct elevator access on both the northbound and southbound platforms. Floor plans of the Shoreline South/145th Station are provided in Drawings N15-APP200 through N15-APP403, while similar plans for the Shoreline North/185th Station are shown in N17-APP200 through N17-APP303, in Attachment I, Book 2 of 2.

6. *Public Amenities – the stations should provide gathering places that create a sense of community and emphasize art, culture, and history of the community by such means as:*

    a. *Using bridge design to create an iconic look where feasible;*

RESPONSE: The Shoreline South/145th Station has been designed for integration with the pedestrian/bicycle bridge (the 148th Street Non-Motorized Bridge) project in order to incorporate that public amenity and support a broader sense of community. The Shoreline North/185th Station's pedestrian bridge is provided between the parking garage and the station to accommodate ease of pedestrian access between the bus loop (on the top level of the parking garage), and the station is an iconic form-follows-function design statement.

b. Installing bicycle storage with covered racks and lockers;

RESPONSE: Each station has covered rack storage, locker storage, and uncovered rack storage for bicycles. The Shoreline South/145th Station will have bicycle racks installed along the east side of the south and north station structures on the station plaza. Bicycle lockers are will also be located on the west side of the plaza between the south station structure and the north station structure, as shown on drawings N15-APP201 through -203 (Attachment I, Architecture, Book 2 of 2).

The Shoreline North/185th Station will have bicycle racks installed at the south end of the station, on the southwesterly corner of the entry plaza. In addition, there will also be bicycle lockers located just east of the north end of the station, between the ancillary building and the pedestrian/bicycle path coming from the north, as shown on drawing N17-ASP100 (Attachment I, Architecture, Book 2 of 2).

c. Installing garbage and recycling receptacles;

RESPONSE: The stations and garages will have garbage and recycling receptacles per Sound Transit DCM Chapter 9.8.6 (Attachment R), which provides that "[t]rash and recycle receptacles at at-grade stations shall be placed in clear areas away from canopies and windscreens. Trash and recycle receptacles shall be provided near fare vending areas and at plazas and bus/shuttle areas. A minimum of one trash and one recycle receptacle per fare vending area shall be provided."

d. Providing seating (covered and uncovered);

RESPONSE: Covered and uncovered seating for patrons is provided at each light rail transit station's platform area. Platform seating is distributed along the length of the platform and most seating is located adjacent to windscreens to provide more weather protection for patrons while seated. Covered and uncovered seating is also provided in the station plaza areas and at the station entrances. Floor plans of the Shoreline South/145th Station are provided in N15-APP200 through N15-APP403, while similar plans for the Shoreline North/185th Station are shown in N17-APP200 through N17-APP303, in Attachment I, Book 2 of 2.

e. Using icon-based signage;

RESPONSE: Sound Transit's standard signage uses pictograms for station identification as well as wayfinding and general information. The station pictograms are unique symbols

used to represent each station throughout the system. The design and selection of the pictogram image for each station will be developed in 2020 as part of Sound Transits in-house pictogram design process for all of the Lynnwood Link Extension stations and will be a part of the station signage. The design process includes a community outreach component for community involvement with the design development. Signage plans are provided in N15-ANP100 through N15-ANP403 (Shoreline South/145th Station), NP15-ANP201 through NP15-ANP702 (NE 145th Street Garage), in Attachment I, Book 2 of 2. Additional detail is provided in the Sound Transit Customer Signage Manual in Attachment M. (This narrative describes the final improvements proposed. The plan set submitted has not yet been updated to show the final signage design for the Shoreline North/185th Station, but it will be similar to signage at Shoreline South/145th Station and will continue to be advanced in close coordination with the City.)

f. Creating flexible spaces for gathering and entertainment, including the potential for leasable spaces;

RESPONSE: Consistent with Guiding Principle #2, open gathering spaces and plazas are part of the designs at both stations to facilitate public gathering and entertainment. Each of the station plazas are designed to accommodate vendor carts, although leasable spaces are not anticipated at the stations. These areas are illustrated on the site plans of each station area that are provided in Drawing Nos. N15-ASP100 and N17-ASP100 (Attachment I, Architecture, Book 2 of 2).

The public plaza at the Shoreline South/145th Station (approximately 26,000 square feet) is along the front of the station, extending from the North Station Entry south to the South Station Entry and turning east to the associated parking garage. The station area pick-up/drop-off area, north of the parking garage, includes multifunctional bollards rather than curbs to separate cars from pedestrians, while also providing seating space. The public space includes art, landscaping, and site design combined to support a flexible public gathering space that also functions as a station pick-up/drop-off area. The site can be closed to auto traffic and used for public gatherings and special events (pick-up/drop-off users would be directed into the garage at these times).

At the Shoreline North/185th Station, public plaza spaces (approximately 32,000 square feet total) are located at the South Station Entrance at NE 185th Street and 5th Avenue NE, between the station and garage, and at the junction of the shared use path at the North Station Entrance. An additional public gathering space is provided at the corner of NE 185th Street and 8th Avenue NE. Pedestrian amenities such as benches and resting areas, public art, colored and varied texture pathways are provided within the public plaza areas.

g. Including weather protection elements; and

RESPONSE: There are numerous weather protection elements at the stations including bus shelters, covered bike storage, and platform canopies with windscreens. At the

Shoreline South/145th Station, much of the plaza is covered by the elevated platform and guideway. Station entrances, stairs and the track crossing structure at Shoreline North/185th Station are covered with canopies and protected by windscreens as well. Elevator surge zones also have canopies, protecting patrons who are waiting for the elevator. Drawings are provided in Drawings N15-ASP100 and N15-AZV002 (Shoreline South/145th Station and Garage) and N17-ASP100 and N17-AZV003 (Shoreline North/185th Station), in Attachment I, Book 2 of 2.

h. Consider providing restrooms.

RESPONSE: Restrooms for transit vehicle operators and maintenance staff, as well as public restrooms for commuters, are provided at each station. The Shoreline South/145th Station has two transit driver restrooms that are located on the plaza level at the northwest corner of center station structure. There is one staff restroom, also located in the center station structure on the plaza level and is accessed from the interior station corridor. Two public restrooms are located on the west side of the south station entrance on the plaza level. Restrooms are shown on drawings N15-APP201 through -203 (Attachment I, Book 2 of 2).

The Shoreline North/185th Station restrooms are all located in the Ancillary building located northeast of the north end of the station. There are two transit driver restrooms at the southeast corner of the Ancillary Area and two public restrooms on the southwest corner of the Ancillary Area. Restrooms are shown on drawing N17-AID101 (Attachment I, Book 2 of 2).

7. Transit Oriented Development – promote TOD through facility siting and design that is supportive of future development opportunities.

RESPONSE: Each station is designed to support and promote transit-oriented development in its vicinity to help build transit-oriented communities and increase ridership, in accordance with Sound Transit's Equitable Transit Oriented Development Policy, Resolution R2018-10. The siting and design of the stations is supportive of the City's recently adopted station area development code and encourages future transit-oriented development opportunities as called for in this criterion. To ensure that the Project does not hinder or discourage appropriate development or uses in the vicinity of the Project, the Project's buildings, structures, walls, fences, and landscaping will meet the City's code requirements where practical, or Sound Transit has collaborated with the City to identify appropriate modifications or departures, neither of which are anticipated to hinder or discourage development or use of nearby properties.

For example, shared-use pathways within the station areas serve to provide multimodal connections to surrounding pathways and sites designed to support future transit-oriented development surrounding the stations. Furthermore, plaza spaces at stations are designed

to promote pedestrian activities that support the density anticipated with transit-oriented development in the vicinity of the stations.

At the Shoreline South/145th Station, provisions have been made at the northwest corner of the site to connect with an interim and future final shared use path. This connection will also provide convenient access to future development north of the station. There are multiple pathways from 5th Avenue to the station that are buffered by landscaping, which create inviting connections from potential future development to the station and to the shared use public gathering/drop-off space.

At the Shoreline North/185th Station, the shared use path extending north to 189th Street provides access to the north station plaza and entrance from future development to the north. This development could provide direct connection to the path between the station and 189th Street. Additionally, for the boundary between the station site and the properties to the north and east, Sound Transit elected to grade a slope rather than build a wall, specifically to ease connection of future development to the station. The inclusion of a landscaped public gathering space on the corner of 185th Street and 8th Avenue will create a more inviting connection to future development to the south and east.

The addition of public gathering spaces at both stations provides public benefits for future residents and businesses that will enhance the urban design character of the neighborhood. Elevations of each station and garage are provided in Drawing Nos. N15-AEE100 through -107 (Shoreline South/145th Station), NP15-AEE101 through NP15-AEE104 (NE 145th Street Garage), N17-AEE100 through N17-AEE300 (Shoreline North/185th Station), and NP17-APP991 through NP17-APP992 (NE 185th Street Garage) in Attachment I, Book 2 of 2.

8. *Public Art – integrate elements of art wherever possible by:*

    a. *Utilizing local artists when feasible; and*

RESPONSE: The artist for the Shoreline South/145th Station and Garage, Buster Simpson, is a local artist based in Seattle, Washington. While a nonlocal artist will be used for the Shoreline North/185th Station, Sound Transit's art procurement process was open to all qualified applicants and local artists are used when feasible. Attachment K provides additional information on this process.

    b. *Enhancing facades and public spaces with art.*

RESPONSE: The intent of the station art is to be integrated into each station's design, enhancing the look and feel of the public space.

For the Shoreline South/145th Station, artist Buster Simpson has designed a sculptural downspout on the south façade of the station's parking garage. The sculpture consists of a graceful archway of steel with wire supports that will jump from the building to a sculptural "cairn" in the landscape below. Inspired by the straightforward forms of center-

pivot farm irrigation, the sculpture is intended to highlight the pathway of stormwater flowing from the garage's upper level to the ground, where some of it will be used to support the station's landscape. The stormwater will be channeled from the cairn to the top of the south sound barrier wall (separating the station entrance from I-5), where strategically placed weep holes will feed a moss garden near the entrance to the light rail station.

Simpson's planned companion sculptural downspout for the north garage façade is not shown in this Application because of unanticipated complications with the facility's drainage design. If that artwork proves infeasible, the ST*art* Program will work with Simpson to develop artwork on the north side of the garage as a replacement.

In addition to the sculptural downspouts, Simpson is designing two-dimensional artwork for the eastern edge of the south façade of the station parking garage. In its early stages of development, the artist is interested in wayfinding and timekeeping and may use celestial navigation as a theme.

Simpson has championed sustainable development since long before it became a common concern. Throughout his career, Simpson has created works that explore and reveal how we manage our natural resources and has used those works to suggest thoughtful and pragmatic approaches to the development of our built surroundings. Simpson's projects for the Shoreline South /145th Station are related to stormwater-harvesting artworks he has created for other cities and institutions in the US.

For the Shoreline North/185th Station, inspired by Shoreline neighbors' stories of living amid big trees, artist Mary Lucking will create a series of sculptures bringing the forms of the forest understory into the station facility. As a fan of illustrated children's literature, Lucking imagines herself in the role of the hero of Harold and the Purple Crayon, drawing a landscape of plants as lines in space. Lucking hopes to work with a blacksmith to realize the artwork in hand-worked materials.

Mary Lucking writes, "I create artworks that help people explore and understand the environments and communities where they live. My work ranges from large-scale, permanent artworks to temporary interactive installations. My projects include art incorporated into urban and rural walking and biking trails, public transit stations, college campuses, and neighborhood parks."

Images of the proposed artwork are provided in Attachment L. Additional information on Sound Transit's approach to public art is provided in Attachment K.

6.3 Modification and Waiver Requests per SMC 20.40.438(D)

SMC 20.40.438(B) and (C) identify the development standards and requirements applicable to light rail facilities and systems in the City. The Project will comply with the standards except

where modifications are allowed by the City pursuant to SMC 20.40.438(D). This section of the SMC acknowledges that "[d]ue to the unique nature of a regional light rail transit system and its facilities, strict application of th[e] Code's development standards will not always be possible," and therefore authorizes the City to waive or modify these standards or requirements as part of the SUP process if compliance with one or more of the development standards or requirements:

1) would make siting, development, or operation of the facilities impossible or impracticable (as defined by WAC 365-196-550 and/or other law);

2) would result in reduced public benefits; or if

3) alternative actions could meet or exceed the intended goals of such requirements.

Consistent with the mandates of Washington's Growth Management Act (GMA), Criterion (1) above is intended to prevent the application of City development standards or requirements that would operate to preclude the Project, which is an essential public facility under Washington law. *See generally* RCW 36.70A.200 (Siting of Essential Public Facilities). The GMA and its implementing regulations prohibit the application of City Code requirements that would make the siting of an essential public facility impossible or impracticable, as follows:

> Cities and counties may not use their comprehensive plan or development regulations to preclude the siting of essential public facilities. Comprehensive plan provisions or development regulations *preclude the siting of an essential public facility if their combined effects would make the siting of an essential public facility impossible or impracticable*.
>
> > (i) Siting of an essential public facility is "impracticable" if it is incapable of being performed or accomplished by the means employed or at command.
> >
> > (ii) Impracticability may also include restrictive zoning; comprehensive plan policies directing opposition to a regional decision; or the imposition of unreasonable conditions or requirements.

WAC 365-196-550(3)(a) (emphasis provided).

Pursuant to SMC 20.40.438(D), Sound Transit requests that the waivers or modifications described below be granted. Each requested modification or waiver is explained below, along with the justification.

1. Parking Stall Length – Shoreline South/145th Garage and Shoreline North/185th Garage

- Code or standard: *SMC Table 20.50.410F - Minimum Parking Stall and Aisle Dimensions. The standard parking stall size for 90-degree angle parking shall be a minimum of 8.5 feet wide by 20 feet deep, with a 23-foot-wide drive aisle. Up to 50% of stalls may be compact. Compact stall size shall be a minimum of 8 feet wide by 16 feet deep for 90-degree angle parking. Structural columns or permanent structures can only encroach into a parking stall six inches for the first and last four feet of the stall depth.*

- Modification requested: Sound Transit proposes that the parking garage layout consist of a 90-degree parking stall layout, each stall designated as standard will be a minimum of 8.5 feet wide by 18 feet long. The two-way drive aisles will be a minimum of 23 feet wide. Parking stalls designated as compact will be a minimum of 8 feet wide by 16 feet long. Sound Transit proposes a total unit depth of at least 59 feet, which is consistent with the total unit depth that would result from one 16 foot compact stall, a 23 foot drive aisle, and a 20 foot standard stall, as allowed in the SMC. Sound Transit has proposed columns that encroach into the parking stall 1-foot, on one side only, for the last foot of stall depth. At Shoreline South/145th Garage, 491 of the 500 stalls (98%) meet or exceed the proposed standard stall depth, 35 (7.0%) are compact in width (8 feet wide), 9 (1.8%) stalls are compact in depth (16 feet deep), and the remaining 9 stalls (1.8%) designated as ADA compliant. At Shoreline North/185th Garage, all of the stalls meet or exceed the proposed standard stall size of 8.5 feet wide by 18 feet long.
- Justification: The requested modification provides the equivalent total unit depth of 59 feet for a parking layout as would result from meeting the requirements of SMC 20.50.410(F) with a standard size parking stall depth on one side of the two-way drive aisle and a compact size parking stall depth on the other. Instead of a 20-foot by 23-foot by 16-foot configuration this modification provides a minimum of an 18-foot by 23-foot by 18-foot configuration.

  The requested modification allows for a 12-inch structural column encroachment instead of a 6-inch structural column encroachment, but limits the extents of this encroachment to the first foot of the stall depth rather than the first and last 4 feet and restricts the encroachment to only one side. The proposed wider but shallower encroachment requested in this modification will allow the parking stall to function as well or perhaps better than it would under the column encroachment requirements of SMC 20.50.410(F). SMC 20.50.380.E states part of the purpose of the code is to "Assure safe, convenient, efficient and adequately sized parking facilities." The proposed modification meets or exceeds this purpose. Under the proposed code modification, only one side of a stall will be encroached rather than potentially having both sides encroached. With two sides encroached in accordance with the SMC standard, the overall width of encroachment would be the same as what Sound Transit is proposing. Additionally, the one foot deep encroachment will be less impactful to maneuverability in and out of a parking stall that a 4 foot deep encroachment, which would require vehicles to be better aligned when parking.

  Though current code would allow up to 50% of the required parking spaces to be compact in depth and/or width, this proposed design would provide over 85% of the required parking spaces to be the proposed standard size stalls. As a result, there will be a better customer experience due to larger vehicles no longer having to travel as far to find a standard stall size, or having such vehicles attempt to park in a compact stall and take

up more than one stall, rather than find a standard stall. The proposed 8.5-foot-wide by 18-foot deep stalls (uniform stall size) for the majority of the parking stalls in both garages is consistent with industry standard to use uniform stall sizes in parking garages.

Sound Transit has also minimized the number of compact width parking stalls for the Shoreline South/145th Garage and Shoreline North/185th Garage which allows for wider vehicles to be fully accommodated within the stall and not to take up more than one parking space.

SMC 20.40.438(D) indicates that SMC 20.50.410(F) may be modified if the alternative action meets or exceeds the intended goal of the requirement. With an identical unit depth for the parking bays and column encroachment only at the front corner of a stall, this modification will meet or exceed the intended goals of the requirement of SMC 20.50.410(F) to provide adequate space for vehicles to maneuver and park within the garage.

- Supporting information: Attachment AA provides the Shoreline South/145th Garage floor plan (Exhibit 1a), the Shoreline North/185th Garage floor plan (Exhibit 1b), and DCM Chapter 31 and approved Sound Transit deviations to the Chapter 31 requirements (Exhibit 1c).

2. Landscape buffers – R-6, MUR-70, and MUR-45 Land Use Zones
   - Code or standard: *SMC 20.50.490 (A and C) – Landscaping along interior lot lines.*

     A. *Type I landscaping in a width determined by the setback requirement shall be included in all nonresidential development along any portion adjacent to single-family and multifamily residential zones or development. All other nonresidential development adjacent to other nonresidential development shall use Type II landscaping within the required setback. If the setback is zero feet then no landscaping is required.*
     C. A 20-foot width of Type I landscaping shall be provided for institutional and public facility development adjacent to single-family residential zones. Portions of the development that are unlit playgrounds, playfields, and parks are excluded.

   - Application of the Code to the Project: The majority of the Project will be constructed and operated within WSDOT right-of-way adjacent to I-5. Sound Transit will typically acquire the rights to use these portions of WSDOT right-of-way through air space leases. In some areas where the Project will be located at-grade, Sound Transit and WSDOT may agree that fee ownership conveyances may be more appropriate.

     WSDOT staff have informed Sound Transit and City staff that pursuant to state law, the State has the power to regulate land uses within its highway system, not local jurisdictions. Thus, as a general rule, the City's Landscape Buffer standards would not apply to Project facilities constructed in WSDOT right-of-way.

Sound Transit and City staff concur that for those portions of the Project constructed in WSDOT right-of-way subject to the air space leases, the Project will comply with WSDOT's landscaping standards, instead of the City's.

Where Sound Transit's Project is located within WSDOT right-of-way and Sound Transit purchases the land from WSDOT, the Project will be constructed consistent with the City's Landscape Buffer standards except in limited cases, which are described below:

- Waiver requested: The waiver requested from SMC 20.50.490 (A and C) would allow areas along the corridor, where the Project is adjacent to R-6, MUR-70, and MUR-45 zones, to fully or partially omit the Type I and Type II landscape buffer plantings. These locations along the corridor are shown in Exhibit 2a and 2c.
- Justification: The Type I and Type II landscape buffers required by SMC 20.50.460 in these locations would normally require the planting of large evergreen and deciduous trees. For the reasons set forth below, strict application of the standards to require Sound Transit to provide buffers and plant in these locations, or acquire more property to meet the standard, would be impracticable, would substantially reduce public benefits, and the intended goals of these requirements can be met through alternative actions. Specifically, where landscape buffers cannot be planted, Sound Transit proposes a payment in lieu agreement be completed between Sound Transit, the City (and/or a third party), whereby Sound Transit would provide an amount of up to $250,000 to fund the installation of alternative landscaping in nearby neighborhoods.
    - In the areas shown in Exhibit 2a, there is not sufficient space to plant safely adjacent to the guideway. This occurs in both the MUR and R6 zoned areas. These locations fall within the Vegetation Clear Zone of the light rail facility where trees are not allowed to be planted. The Vegetation Clear Zone requirements are described in the Sound Transit DCM section 10.3.2, and shown in Figures 10-1 and 10-2. These requirements are in place to keep vegetation from creating safety or operational hazards to the light rail facility. The close proximity and small width of the construction work zone (i.e. available planting area) prohibits moving these buffers further away from the guideway. In short, there is not enough available space adjacent to the guideway to safely plant these buffers and Sound Transit and City staff agree that purchasing and demolishing homes and/or other property to adhere to the landscape buffer code requirement is impracticable and unreasonable. In all locations of this code modification there is an existing noise wall to remain or a proposed noise wall to be built that will act as partial screening, and in combination with the alternative landscaping arrangements, would meet or exceed the intended goals of the code.
    - At two TPSS locations shown in Exhibit 2a the equipment and functional requirements of the sites extend to the property lines. This leaves no additional room for landscape buffers. These locations are in MUR-70 zone, and strict

application of the required buffer would be impracticable and would result in reduced public benefit because the buffer either would not fit on the site, or would fall within the Vegetation Clear Zone. The landscape buffer at both locations will be replaced by a screening wall; an alternative design which will also advance the intended goals of the landscape buffer.

- Included in Exhibit 2a are private properties where temporary construction impacts occur. These areas fall within the Vegetation Clear Zone, where the application of the landscaping requirements would be impracticable or impossible. Sound Transit will restore to a seeded condition and provide financial compensation for vegetation loss as part of the temporary construction easement agreement. Sound Transit proposes the third party alternative landscaping option to be applied to this impacted area. This will advance the intended goals of the landscape buffer requirements.
- The two Sound Transit owned parcels, LL172 (shown on N16-LPP113 in exhibit 2a) and LL182 (shown on N16-LPP114 in exhibit 2a), are zoned residential and would likely remain so even if surplussed by Sound Transit in the future. The required buffer planting would cover almost the entire property. It seems to be an inefficient use of public funds to provide the buffer planting at this time, only to have it removed in the near future by the subsequent owners. Instead, Sound Transit proposes to include these as eligible parcels in the payment in lieu agreement described above.
- On two Sound Transit owned parcels (LL177 and LL196) design changes at the 100% design phase have reduced the available width to plant a full 20' wide Type I buffer.
    - Along the East side of LL177 the 20' wide buffer Type I buffer planting is limited to 15'-9" width for in a 20' long section adjacent to an access driveway. The full number of required buffer trees will still be planted though, and the required shrub planting will exceed the minimum width of 20' for the remaining length of the parcel. This will meet the intended goal of the landscape buffer requirement.
    - Along the East side of LL196 a 20' wide Type I buffer is provided. The northern most 60' of the buffer though, tapers from the full 20' width, down to 10'-4" wide at the north end of the parcel. This taper is due to Vegetation Clear Zone limitations as the buffer angles towards the guideway. The full number of required trees are planted along the entire length of the buffer. In addition to the tapered width of the buffer planting there is a new noise wall built next to the guideway. In conjunction together these will meet the intended screening goal of the landscape buffer requirements.

- On Parcel LL169 Type I and Type II buffer are required along the northern property line. The Type I Buffer on the east end of the property line will be provided by existing planting in combination with corridor planting on the interior of the site. The west end of the property line is a combination of required Type I buffer adjacent to residences, and Type II buffer adjacent to the fire station. A sewer pipe and easement runs along the west end of the north property line limiting the ability to plant trees there. The planting in this location consists of wetland and wetland buffer restoration work. In line with best practices this area will need to be planted with smaller material. This combination of the sewer easements and smaller wetland planting limit restrict the available area to plant required buffer. While the smaller plantings will not be at the required height at time of planting, they should fill in fairly quickly. This includes the 8' tall corridor planting in the center of the parcel that will help to mitigate for the lack of screening provided.
- South of NE195th to the WSDOT RCA and North of NE 195th St. to the end of the L200 package the 20' width Type I buffer is provided by proposed tree plantings, and existing vegetation. In these locations, however, the shrub portion of the required landscape buffer would be omitted due to existing vegetation and the existing noise wall, which act as that portion of the buffer for the adjacent residential area, and which serves to advance the intended goals of the landscape buffer requirements. Between these two areas, as indicated in Exhibit 2A, the 20' Type I Landscape buffer could not be provided due to lack of available planting area. The existing noise wall will remain throughout.
- In the areas shown in Exhibit 2c the light rail facility is aerial and fully within WSDOT right-of-way. Sound Transit is leasing the land from WSDOT, which will not allow permanent landscape buffer planting within the limited access right-of-way, so any City requirement for additional, permanent landscaping would make it impracticable or impossible for the Project to be sited. To satisfy any tree planting required by WSDOT, additional trees may be planted in these areas as infill planting, but they will not be treated as or considered permanent landscape buffer under the SMC. Trees in this location will be planted by Sound Transit and not subject to the payment in lieu/third party option that was discussed earlier in the justification intro.

- Supporting information: Attachment AA provides Drawings indicating the Type I and Type II areas (Exhibit 2a), the Vegetation Clear Zone from the Sound Transit DCM (Exhibit 2b), and the area of aerial guideway on leased WSDOT right-of-way (Exhibit 2c).

3. Dedication of Right-of-Way

REVISION
March 18, 2019
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- Code or standard: *SMC 20.70.120(A) - Dedication shall occur at the time of recording for subdivisions, and prior to permit issuance for development projects.*

- Modification requested: Sound Transit requests a modification to SMC 20.70.120(A) regarding the timing of right-of-way dedications that would allow construction permits to be issued before finalization of all dedications, and that these dedications occur before the start of the Project's revenue service and final occupancy. This proposal is intended as an alternative action that will meet or exceed the intended goals of the City's dedication requirements.

  Justification: Sound Transit has provided the City with documentation of Sound Transit Board authorization to acquire properties needed for the Project. Sound Transit also plans to provide documentation of possession and use for all applicable properties, ahead of issuance of the Special Use Permit.

  In order to determine the exact dimensions of dedications to the City that would meet the intended goal of this section, Sound Transit must wait for construction and as-built surveys in order to base the dedications on the most accurate information. Given past experiences from light rail projects, Sound Transit anticipates revisions and/or adjustments will occur during construction that could affect the limits of dedications. Dedication based on final construction conditions is the most accurate and efficient way to manage dedications in a manner that best utilizes taxpayer dollars instead of correcting dedications if adjustments are needed.

4. Frontage Improvements

Code or standard: *SMC 20.70.320 Frontage Improvements*

A. Standard frontage improvements shall be upgraded or installed pursuant to standards set forth in the Transportation Master Plan Street Classification Map, the Master Street Plan adopted in Chapter 12.10 SMC, and the Engineering Development Manual for the specific street which is substandard to satisfy adequate public roadways required for subdivisions by Chapter 58.17 RCW and Chapter 20.30 SMC, Subchapter 7, and to mitigate direct impacts of land use approvals.

B. Standard frontage improvements consist of right-of-way dedication, curb, gutter, sidewalk, amenity zone and landscaping, drainage improvements and pavement overlays up to one-half of each right-of-way abutting a property as defined in the Master Street Plan.

- Modification Requested: Sound Transit requests a modification to the frontage improvement requirements of SMC 20.70.320. The proposed modification seeks to provide the following for locations where it is mutually agreed that full standard frontage improvements are not necessary based on the traffic impacts anticipated from the Project

: 1) non-standard shared-use path or shared-use sidewalk will be constructed in lieu of the standard non-motorized frontage improvements, at various locations in the vicinity of the Project, consistent with the engineering deviations requested in Section 6.5 of this application, or 2) standard frontage improvements may consist only of right-of-way dedications, and not frontage improvements. The specific locations of the shared-use path or shared-use sidewalk are currently included in the design documents for the Project (Exhibit 4a in Attachment AA). The locations for right-of-way dedication are agreed upon in principle by both the City and Sound Transit as outlined in the Letter of Concurrence provided in Exhibit 4b of Attachment AA.

- Justification: The purpose of this chapter is to *"provide safe and accessible transportation facilities for all modes of travel as described in the Comprehensive Plan, Transportation Master Plan, and the Parks, Recreation and Open Space Plan."* The Project's anticipated impacts to motorized and non-motorized traffic vary by location within the City. The City and Sound Transit have agreed upon providing a variety of frontage improvements along the Project alignment that benefit the public beyond existing frontage infrastructure, and are commensurate with the anticipated impacts of the Project. The locations of the shared-use trail and sidewalk best serves the public where current pedestrian and bike connections do not exist or are substandard. In addition, on February 2, 2018, the City and Sound Transit entered into a Funding and Intergovernmental Cooperative Agreement ("Funding Agreement") that provides, in part, that the parties work together to improve public access within or adjacent to the Project and identify options for non-motorized access projects, such and the City's "Trail Along the Rail Project" (See Attachment H). Granting this code modification for the agreed-upon shared-use trail or sidewalk in lieu of full frontage improvements outlined in Exhibit 4b (Attachment AA) is consistent with these purposes, as well as the commitments in the Funding Agreement. Specific locations and further design details are discussed in Deviation Nos. 7 and 8 in Section 6.5 below, and are shown in the accompanying exhibits for that section. At several locations where the Project is not anticipated to increase motorized or non-motorized traffic, the City and Sound Transit agree that providing right-of-way dedication (outlined in Exhibit 4b of Attachment AA) will meet the intent of the code. The intent of the applicable City Code chapter is met because the public will benefit from adequate ROW for the construction of frontage improvements in the future, at such time as impacts from other projects result in increased motorized and non-motorized traffic.

6.4 Departure Requests for Design Standards – SMC 20.30.297

Departure from commercial design standards (SMC 20.50.220 through 20.50.250) that are applicable to light rail per SMC 20.40.438 may be approved by the City per the procedures for Administrative Design Review (ADR) under the provisions of SMC 20.30.297.

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A departure may be approved if:

- It is consistent with the purposes or intent of applicable subsections (per SMC 20.30.297(A)(1)); or
- It is justified by unusual site constraints under which meeting codified design standards would represent undue hardship to achieving full development potential (per 20.30.297(A)(2)).

1. Corner Site – NE 145th Street Garage.

- Code or standard: SMC 20.50.240(D)(1) – Corner Sites. All building and parking structures located on street corners (except in MUR-35) shall include at least one of the following design treatments on both sides of the corner:

    a. *Locate a building within 15 feet of the street corner. All such buildings shall comply with building corner standards in subsection (D)(2) of this section;*

    b. *Provide a public place at the corner leading directly to building entries;*

    c. *Install 20 feet of depth of Type II landscaping for the entire length of the required building frontage;*

    d. *Include a separate, pedestrian structure on the corner that provides weather protection or site entry. The structure may be used for signage.*

- Departure requested: Allow an average width of 20 feet of Type II landscaping for the length of the NE 145th Street Garage building adjacent to 5th Avenue NE and the I-5 onramp. Due to the multiuse pedestrian pathways proposed, and the space allocated for the transit center and the pick-up/drop-off areas, a consistent 20-foot-wide Type II landscape is not practicable without reducing other public benefits of the project, which justifies a departure. However, by averaging the widths, and including landscape within the WSDOT right-of-way north of the I-5 onramp, the total amount of Type II landscape provided more than doubles what is required, and will help soften the appearance of the parking garage, meeting or exceeding the intended goals of the corner site design requirements.
- Justification: Of the design treatment options listed, only option "c" is applicable, or best serves the public and complements the light rail development at the NE 145th Street Garage. Option "a" is not recommended as it would place the parking garage farther from the station, reducing public benefits by requiring longer distances for pedestrians to walk to and from the station. Moving the parking structure closer to the street corner would also reduce the space available for the multiuse path, and publicly-beneficial landscaping, in particular evergreen trees, to help visually soften the garage. Option "b" is not recommended as the corner would reduce public benefits by creating safety concerns by encouraging pedestrians to gather too close to the I-5 on-ramp to the south. In addition, pedestrians and bicyclists will be moving between modes of transportation and will not

need to wait or mingle at this corner. This option is more applicable to a downtown main street condition with retail at ground levels. Option "d" is not recommended for similar reasons, as there is no publicly-beneficial rationale for the safety risks of waiting at the corner of NE 145th and the I-5 on-ramp. In addition, it would be dangerous to encourage vehicles to drop-off or pick-up at this location. Designated waiting areas are provided at the pick-up/drop-off area north of the garage, and at plazas closer to the station. Option "c" is the most appropriate standard to apply to the NE 145th Street Garage building.

In accordance with the ADR provisions of SMC 20.30.297, the proposed departure is consistent with the purposes or intent of the applicable subsection. The purpose statement for this subsection is in SMC 20.50.240(A) Site Design. Below is the justification for how the proposed departure is consistent with the purposes of this subsection.

1. Promote and enhance public walking and gathering with attractive and connected development.

   On the east side of the garage, adjacent to 5th Avenue NE, the proposed average landscape buffer provides more total buffer between the garage and the multiuse path than is required by code (4,400 SF required, 5,000 SF provided). The configuration also minimizes the distance from the garage to the station, while also providing width for a 14' wide multiuse path and a 5 foot wide amenity strip adjacent to 5th Avenue. Changing the garage or site layout to provide 20 feet of buffer along the entire length would either reduce the amenity strip, reduce the width of the multiuse path, or reduce the width of the walkway on the east side of the garage. Any of these changes would degrade the public's walking experience compared to the proposed configuration.

   On the south side of the garage, adjacent to the NB I-5 on-ramp, a minimum 11-foot-wide buffer is provided between the garage and the multiuse path. In addition, there is an approximately 45-foot-wide buffer provided between the multiuse path and the on-ramp. The proposed average buffer area is greater than the amount required by code (2,600 SF required, 7,300 SF provided). The proposed solution maximizes the separation between the ramp where cars will be accelerating to freeway speeds, and the multiuse path, while still maintaining enough buffer width to provide vegetative screening between the garage and multiuse path. This configuration meets the purpose of enhanced public walking space with an attractive connected development by providing a protected and aesthetically pleasing connection between the station plaza and the street corner.

2. Promote distinctive design features at high visibility street corners.

   The primary concern at this corner for the functionality of the station is to draw people to the pathways that lead them to the station plaza and entrance. The design of the street corner, with the landscape buffer and wide shared use paths around the

garage helps to achieve this goal. The garage itself is distinctive and will be enhanced by art work on the south shear wall closest to the corner of 5th Avenue NE and the I-5 onramp. A large specimen tree will be located at the corner, with groundcover planting, to help guide pedestrians to the primary multiuse pathway.

3. Provide safe routes for pedestrians and people with disabilities across parking lots, to building entries, and between buildings.

   This purpose is not directly applicable with regards to the departure request of averaging the width of landscape buffer. The landscape buffer adjacent to the garage building provides sufficient width in all areas to contribute toward the safety of routes for pedestrians and people with disabilities.

4. Promote economic development that is consistent with the function and purpose of permitted uses and reflects the vision for commercial development as expressed in the Comprehensive Plan.

   This purpose is not directly applicable with regards to the departure request of averaging the width of landscape buffer. The landscape buffer widths adjacent to the garage building does not impact promotion of economic development but supports the vision for development by providing landscape buffers adjacent to multiuse pathways leading to building entries.

- Supporting information: Attachment BB provides analysis of the Type II landscape widths, May 2018 (Exhibit 1a) and a summary of landscape code requirements (Exhibit 1b).

2. Metal Siding Proximity to Grade – Shoreline South/145th Station

- Code or standard: SMC 20.50.250(B)(8)(a) – Building Articulation. Metal siding shall have visible corner moldings or trim and shall not extend lower than 4 feet above grade. Masonry, concrete, or other durable material shall be incorporated between the siding and the grade. Metal siding shall be factory finished with a matte, nonreflective surface.

Shoreline South/145th Station

- Departure requested: Allow metal siding to extend as low as 6 inches above grade at the Shoreline South/145th Station and Garage. Sound Transit proposes that along approximately 403 feet of the 784-foot perimeter of the Shoreline South/145th Station, concrete or masonry will extend from the ground up at least 3 feet 8 inches above grade. For the remaining 381 feet, which flank each station entrance, metal panels extend to within 6 inches of grade. At the Shoreline South/145th Garage, Sound Transit proposes that along approximately 652 feet of the 712-foot perimeter concrete or masonry will extend from the ground up at least 3 feet 8 inches above grade. For the remaining 60 feet, which flank the elevator enclosure and pedestrian entrance, metal panels extend to within 6 inches of grade.

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- Justification: In accordance with the ADR provisions of SMC 20.30.297, the proposed departure is consistent with the purposes or intent of the applicable subsection. The purpose statement for this subsection is in SMC 20.50.250(A) Building Design. Below is the justification for how the proposed departure is consistent with the purposes of this subsection.

  1. Emphasize quality building articulation, detailing and durable materials.

     The proposed perforated and solid metal panels, as specified in Specifications Section 057500 – Decorative Formed Metal and Section 074210 – Metal Wall Panels (Attachment BB, Exhibits 2a and 2b), consist of 0.125-inch aluminum, supported on steel tube framing, with a fluoropolymer finish. Accordingly, the panels would meet the intent for durability and quality detailing established in the code requirement. Elevation drawings of the station are provided in Drawing Nos. N15-AEE100 through N15-AEE107, with the specific areas in question provided on N15-AEE101 and N15-AEE103 (Attachment BB, Exhibit 2c).

  2. Reduce the apparent scale of buildings and add visual interest for the pedestrian experience.

     The design and materials at the garage are presented in such a way that the overall facade is broken up into a smaller, more human scale pattern by the variation in pattern between the spandrel and columns and the variation in material between the concrete spandrels and metal panel screening or open spaces. The variation in panel widths and perforation types provides visual interest for the pedestrian. At the station, the TVM kiosk is a small pedestrian scale standalone structure serving as a visual marker for the station entrance. The metal panels along the stairs/escalator transition from solid to perforated with the rise in the stair and escalator, breaking up the larger enclosure.

  3. Facilitate design that is responsive to the commercial and retail attributes of existing and permitted uses.

     The station design is responsive to the attributes of permitted uses (in this case a transit facility) which requires a safe and secure environment. The metal screening on the garage permits visibility and ventilation on the long faces of the garage, and the screening at the stairs provides visibility from the plaza to the garage, while allowing for closing off the garage during hours when the station and garage are closed.

     The station design is responsive to the attributes of permitted uses (in this case a transit facility) which requires a clear and easy identification of components of the circulation system and the fare vending system. The decision to use full height metal panels at the elevators allows passengers to clearly identify the location of the elevators. The decision to use full height metal panels at the ticket vending machines

allows for easy identification of the kiosks from a distance. Additionally, a light rail station, by nature, contains multiple elements offering variety in material, texture, size and visual appearance that are often not inherent in other building types. By extending metal panels close to grade, the design maintains a varied but clean appearance.

Shoreline North/185th Station

- Departure requested: Allow metal siding to extend as low as 6 inches above grade at the Shoreline North/185th Station and Garage. At the Shoreline North/185th Garage, full height perforated metal screening is proposed along the east and west facades of the garage and at the public and egress stairs. At the Shoreline North/185th Station, Sound Transit proposes that the elevator shafts are clad in metal panels for the full height of the elevator shaft and that the Ticket Vending kiosks are clad in a porcelain enamel metal panel.
- Justification: In accordance with the ADR provisions of SMC 20.30.297, the proposed departure is consistent with the purposes or intent of the applicable subsection. The purpose statement for this subsection is in SMC 20.50.250(A) Building Design. Below is the justification for how the proposed departure is consistent with the purposes of this subsection.

  1. Emphasize quality building articulation, detailing and durable materials.

     The proposed perforated and solid metal panels, as specified in Specifications Section 057500 – Decorative Formed Metal and Section 074210 – Metal Wall Panels (Attachment BB, Exhibit 1a and 1b), consist of 0.125-inch aluminum, supported on steel tube framing, with a fluoropolymer finish. The panels would be secured with tamper-resistant fasteners. Accordingly, the panels would meet the intent for durability and detailing established in the code requirement.

  2. Reduce the apparent scale of buildings and add visual interest for the pedestrian experience.

     The design and materials at the garage are presented in such a way that the overall facade is broken up into a smaller, more human scale pattern. The variation in panel widths and perforation types provides visual interest for the pedestrian. The varied elements and elevations of the Shoreline North/185th station help break up the structures into pedestrian scale elements. The Shoreline North/185th garage is partially buried reducing the overall scale of the structure. The variation between smooth concrete, textured concrete and screening break up the exposed portion of the structure into smaller scale elements.

  3. Facilitate design that is responsive to the commercial and retail attributes of existing and permitted uses.

The station design is responsive to the attributes of permitted uses (in this case a transit facility) which requires a safe and secure environment. The metal screening on the garage permits visibility and ventilation on the long faces of the garage, and the screening at the stairs provides visibility from the plaza to the garage, while allowing for closing off the garage during hours when the station and garage are closed.

The station design is responsive to the attributes of permitted uses (in this case a transit facility) which requires a clear and easy identification of components of the circulation system and the fare vending system. The decision to use full height metal panels at the elevators allows passengers to clearly identify the location of the elevators. The decision to use full height metal panels at the ticket vending machines allows for easy identification of the kiosks from a distance.

- Supporting information: Attachment BB provides Specifications Section 057500 – Decorative Formed Metal (Exhibit 2a), Specifications Section 074210 – Metal Wall Panels (Exhibit 2b). Drawing Nos. N15-AEE100 through N15-AEE107 (Exhibit 2c) for the Shoreline South/145th station. Drawing Nos. NP15-AEE101 through NP15-AEE104. The Shoreline North/185th Garage elevations are currently under development. Elevation drawings of the station are provided in N17-AEE200 and N17-AEX201 drawings, (Attachment BB, Exhibit 3).

3. Window Area at Ground Floor – Shoreline North/185th Station and Garage

- Code or standard: *SMC 20.50.240(C)(1)(d) – Site Frontage. Minimum window area to be 50 percent of the ground floor facade for each front façade.*
- Departure requested: Reduce window percentage to 35% of the Shoreline North/185th Station façade facing NE 185th Street and to 0% of the Shoreline North/185th Street Garage façade facing NE 185th Street. At the station, the front façade is composed of the face of the elevator, two stair entries, and a glazed windscreen (glass window) at the entry to the station. These design features are necessary to provide sufficient access and protection from the elements for commuters using the station. The solid (elevator) portion is 42.5% of the façade area. The open areas at the stairways are 22.2%, and the windscreen glazing (glass windows) is 35.3%.
- Justification: In accordance with the ADR provisions of SMC 20.30.297, the proposed departure is consistent with the purposes or intent of the applicable subsection. The purpose statement for this subsection is in SMC 20.50.240(A) Site Design. Below is the justification for how the proposed departure is consistent with the purposes of this subsection.

    1. Promote and enhance public walking and gathering with attractive and connected development.

The façade facing NE 185th Street serves as the open-air entrance to the station. The combination of the plaza space, the TVM kiosk, the canopy and the glazing at the station serve to enhance the public walking and gathering spaces while drawing people to the station entrance. Glazing is provided in the space between the stair entrances serving, with the canopy, to provide weather protection while allowing light and visibility to the entrance area. Additional glazing would have to be added exterior to the canopy and would not provide enhancement of this area.

2. Promote distinctive design features at high visibility street corners.

   The overall station entrance is designed to be distinctive and serve as a focal point for the station. The TVM kiosk, plaza, and canopy are all in front of the glazed façade, and serve to promote visibility of the building. The glazing serves as a transparent backdrop for these more distinctive features.

3. Provide safe routes for pedestrians and people with disabilities across parking lots, to building entries, and between buildings.

   The station entrance plaza and adjacent sidewalks are design to provide safe routes for people to access the station. Access is provided from the area west of I-5 via a connection to the sidewalk on the NE 185th Street bridge, from the bus transit center via a dedicated walkway, and from the south side of 185th via a signalized crosswalk. The plaza space includes planters and seat walls that serve as physical barriers between vehicular and pedestrian spaces. The intent of this stated purpose is fulfilled without requiring additional glazing in the station façade.

4. Promote economic development that is consistent with the function and purpose of permitted uses and reflects the vision for commercial development as expressed in the Comprehensive Plan.

   This purpose is not applicable to the criteria for a 50% glazed façade. The façade glazing at the station entrance does not have an impact on promoting economic development.

- Supporting information: Drawings of this portion of the station are provided in Drawing Nos. N17-AEE200 (Elevation), N17-AEX201 (Section), N17-APP301 (Plan), N17-AZV003 and N17-AZV004 (Three-Dimensional Exterior Views) in Attachment BB, Exhibit 3.

4. Outdoor Lighting Levels at Stations and Garages – Shoreline South/145th Station and Shoreline North/185th Station

- Code or standard: SMC 20.50.240(H) Outdoor Lighting

  1. All publicly accessible areas on private property shall be illuminated as follows:

a. *Minimum of one-half foot candle and maximum 25-foot pole height for vehicle areas;*
b. *One to two foot candles and maximum 15-foot pole height for pedestrian areas; and*
c. *Maximum of four foot candles for building entries with the fixtures placed below second floor.*

- Departure requested: Sound Transit requests that the Shoreline South/145th and Shoreline North/185th Stations and Parking Garages and sites use the DCM (Table 21-3) required lighting level in place of the light levels required in SMC 20.50.240(H)(1)(b) and (c). Pole height requirements are unaffected by this departure request.

DCM Light Levels by Design Area:

Area	Average Illuminance in Foot Candles (fc)
Platform Edge (Up to four feet back)	10
Remaining Platform	Avg: 7, Min: 5
Mezzanines	5
Stairs, Escalators	10
Fare vending Areas	20
Approaches to Elevators	10
Approaches to Escalators and Stairways	10
Emergency Lighting	Avg: 1, Min: 0.1
Public Restrooms	20
Concessions	10
Entry approaches to stations	7
Bicycle Parking	5
Open Plaza	5
Pedestrian Walkways	3
Bus Loading Zones and Roadways	4
Passenger Drop-off	4
Parking Lots and Garage Roof Parking	Avg: 3, Min: 1.5
Parking Garage Deck and Ramps	5
Face of Signs (vertical)	Min: 10
Fare Vending Areas (vertical)	10

- Justification: The required light levels in SMC 20.50.240(H)(1)(b) and (c) for outdoor public accessible lighting do not represent best lighting design practices for the areas of a combined light rail station and bus terminal. The purpose of SMC 20.50.240 is to "promote and enhance public walking and gathering with attractive and connected development" (A)(1), "promote distinctive design features at high visibility street corners" (A)(2), "provide safe routes for pedestrians and people with disabilities across parking lots, to building entries, and between buildings" (A)(3), and to "promote economic development that is consistent with the function and purpose of permitted uses and reflects the vision for commercial development as expressed in the Comprehensive Plan" (A)(4). The proposed departure would meet or exceed the intent of SMC

20.50.240(A), Site Design, to "promote and enhance public walking and gathering with attractive and connected development" (A)(1) and to "provide safe routes for pedestrians and people with disabilities across parking lots, to building entries, and between buildings" (A)(3). The proposed departure affects lighting levels which will not have an impact on the projects distinctive design features at street corners (A)(2) nor on economic development (A)(4). The various areas of the station are designed to comply with requirements in DCM Chapter 21 (Exhibit 4e), which have been calculated based on task areas, decision and transition points, providing safety in areas of potential hazard through environmental design (CPTED), as well as recommendations from the Illuminating Engineering Society (IES). An overview of recommendations from the IES (the recognized technical authority on illumination), requirements from other accepted codes, and examination of tasks in different use areas all support this approach. The Sound Transit DCM requires light levels that closely match IES recommendations and were specifically developed for light rail transit station applications present at all Sound Transit light rail stations. Using the lighting levels proposed in this departure at each design area provides an appropriate level of lighting for their function, while at the same time minimizing objectionable glare and/or interference with task accuracy, vehicular traffic, and neighboring areas. Requiring each area to decrease illumination to 4 foot candles would negatively impact public walking and gathering and compromise crime prevention (CPTED) and safe routes for pedestrians. These light levels are implemented consistently across all Sound Transit projects.

- Supporting information: See Exhibits 4a (Backup and Code Comparison for Proposed Design Departures to Outdoor Lighting Levels), 4b (Direct Light to 145th Garage Exterior), 4c (145th Site Lighting Levels), 4d (185th Site Lighting Levels), 4e (Sound Transit DCM - Lighting), 4f (145th Garage Roof Direct Light Emittance), 4g (145th Garage Roof Lighting Levels), 4h (Light Fixture Brochure Excerpt) in Attachment BB for additional discussion of lighting levels, including recommendations from the IES for the areas noted above.

6.5 Engineering Deviation Requests

The Project will conform to most of the requirements in the 2016 City of Shoreline Engineering Development Manual (EDM). However, due to unique circumstances of the Project, some engineering deviations are required as directed by the City or requested by Sound Transit as part of this Application for a SUP pursuant to Shoreline Municipal Code (SMC) 20.30.290(B). Per SMC 20.30.290(B), the City of Shoreline (City) may allow deviations from engineering standards if the applicant demonstrates all of the following:

1. *The granting of such deviation will not be materially detrimental to the public welfare or injurious or create adverse impacts to the property or other property(s) and improvements in the vicinity and in the zone in which they subject property is situated;*

2. *The authorization of such deviation will not adversely affect the implementation of the Comprehensive Plan adopted in accordance with State law;*

3. *The deviation is not in conflict with the standards of the critical areas regulations, Chapter 20.80 SMC, Critical Areas, or Shoreline Master Programs, SMC Title 20, Division II;*

4. *A deviation from engineering standards shall only be granted if the proposal meets the following criteria:*

    a. *Conform to the intent and purpose of the Code;*

    b. *Produce a compensating or comparable result which is in the public interest; and*

    c. *Meet the objectives of safety, function and maintainability based upon sound engineering judgement;*

5. *Deviations from road standards must meet the objectives for fire protection. Any deviation from road standards, which does not meet the International Fire Code, shall also require concurrence by the Fire Marshal;*

6. *Deviations from drainage standards contained in the Stormwater Manual and Chapter 13.10 SMC must meet the objectives for appearance and environmental protection;*

7. *Deviations from drainage standards contained in the Stormwater Manual and Chapter 13.10 SMC must be shown to be justified and required for the use and situation intended;*

8. *Deviations from drainage standards for facilities that request use of emerging technologies, an experimental water quality facility or flow control facilities must meet these additional criteria;*

    a. *The new design is likely to meet the identified target pollutant removal goal or flow control performance based on limited data and theoretical consideration;*

    b. *Construction of the facility can, in practice, be successfully carried out; and*

    c. *Maintenance considerations are included in the design, and costs are not excessive or are borne and reliably performed by the applicant or property owner;*

9. *Deviations from utility standards shall only be granted if the following facts and conditions exists:*

    a. *The deviation shall not constitute a grant of special privilege inconsistent with the limitation upon uses of other properties in the vicinity and in the zone in which the property on behalf of which the application was filed is located;*

    b. *The deviation is necessary because of special circumstances relating to the size, shape, topography, location or surrounding of the subject property in order to provide it with use rights and privileges permitted to other properties in the vicinity and in the zone in which the subject property is located; and*

    c. *The granting of such deviation is necessary for the preservation and enjoyment of a substantial property right of the applicant possessed by the owners of other properties in the same zone or vicinity. (Ord. 767 § 1 (Exh. A), 2017; Ord. 724 § 1 (Exh. A), 2015; Ord. 531 § 1 (Exh. 1), 2009; Ord. 406 § 1, 2006; Ord. 238 Ch. III § 7(a), 2000).*

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The engineering deviations sought as a part of this SUP application meet each of the above standards, as applicable, as briefly summarized in the following chart and the exhibits in Attachment CC:

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SUMMARY OF REQUESTED ENGINEERING DEVIATIONS	
Deviation No. 1 – Turn Lane Widths on NE 185th Street and 5th Avenue	
Standard to Deviate From	EDM Table 9 – Typical Lane Widths. *The typical width of turn only lanes shall be 12 feet.*
Deviation Request	Decrease the left-turn lane widths from 12 to 11 feet on NE 185th Street between 5th Avenue NE (west side of I-5) and 8th Avenue NE (east side of I-5). Drawings of the section of roadway for the deviation are provided in Exhibit 1 in Attachment CC.
Justification	Sound Transit proposes this deviation to provide 11-foot-wide left-turn lanes. Per SMC 20.30.290(B), an 11-foot left-turn lane width would provide better utilization of the existing NE 185th Street bridge and roadway widths. In order to provide the additional 1 foot of width per the EDM, not only would additional right-of-way acquisition be required but the bridge would need to be replaced (unless pedestrian path and sidewalk widths were decreased, which is not desired). The bridge cross section was extensively discussed with City engineers and planners, and the resultant section with included 11-foot-wide lanes was determined to be the best solution to accommodate vehicles and pedestrians. As proposed, this deviation would (a) conform to the intent and purpose of the Code; (b) produce a compensating or comparable result which is in the public interest; and (c) meet the objectives of safety, function and maintainability based upon sound engineering judgement. Furthermore, this deviation would not be materially detrimental to the public welfare, or injurious, or create adverse impacts on properties. Increasing the turn lane width to 12 feet could be accommodated by reducing the sidewalk width, which is not desired. In addition, the proposal is consistent with the Comprehensive Plan by balancing the need for improvements with the need to maintain connectivity through this portion of the City. If the bridge were to be replaced, the bridge would need to be closed for an extended period of time, which would require additional detours for the public to cross I-5. The proposed improvements would meet the City's intent to maximize multimodal connectivity while reducing the roadway closures or detours during construction. No conflicts with critical areas regulations or Shoreline Master Program are anticipated since no critical areas or shorelines are located within the area of deviation. This deviation meets International Fire Code and would have no impacts on fire protection objectives.
Deviation No. 2 – NE 185th Street/5th Avenue NE (East of I-5) Intersection	
Standard to Deviate From	EDM Section 13.6(C) – Intersection Grades. *At signalized intersections, the maximum grade is 2 percent within the intersection and extends 200 feet in each direction. Grades above 4 percent will be allowed only in areas with steep topography or other unusual circumstances that prevent a flatter grade.*
Deviation Request	At the NE 185th Street/5th Avenue intersection on the east side of I-5, allow a 3.75 percent slope at the intersection, then increase to an 6.65 percent slope east along NE 185th Street from just outside the intersection east to 8th Avenue NE. Drawings of the proposed intersection are provided in Exhibit 2 in Attachment CC.
Justification	Per SMC 20.30.290(B), the existing intersection grade along this section of NE 185th Street near the proposed light rail station is at a 6.65 percent slope. This is due to existing constraints with the bridge over I-5 (4 percent slope) and the proximity of the NE 185th Street/8th Avenue NE intersection (240 feet, and an approximate grade difference of 15 feet), which create a steep intersection area. To meet EDM Section

SUMMARY OF REQUESTED ENGINEERING DEVIATIONS	
	13.6 (C), the existing I-5 crossing bridge would need to be rebuilt and the NE 185th Street/8th Avenue NE intersection would be raised greater than 10 feet to keep grades below 2 percent. The proposed intersection grade would meet Americans with Disabilities Act (ADA) crosswalk standards (Public Rights-of-Way Accessibility Guidelines Section R302.6 Cross Slopes) for the south, west, and north legs of the intersection. No crossing is proposed on the east leg. Adequate sight distance is still provided to see the traffic signal. The authorization of this deviation would be consistent with the implementation of the Comprehensive Plan by providing improved multimodal and Americans with Disabilities Act (ADA) access near the NE 185th Street Station. This deviation would not conflict with the critical areas regulations or Shoreline Master Program since no critical areas or shorelines are within the area of deviation. This deviation meets International Fire Code and would have no impacts on fire protection objectives. As proposed, this deviation would (a) conform to the intent and purpose of the Code; (b) produce a compensating or comparable result which is in the public interest; and (c) meet the objectives of safety, function and maintainability based upon sound engineering judgement. Furthermore, the deviation will not be materially detrimental to the public welfare or injurious or create adverse impacts to the property or other properties and improvements in the vicinity and in the zone in which the subject property is situated
Deviation No. 3 – Horizontal Curves of 5th Avenue NE at NE 185th Street	
Standard to Deviate From	EDM Table 13 – Horizontal Curve Design. *Streets shall meet the horizontal curve design requirements required for each design speed.*
Deviation Request	Allow the horizontal curve design of 5th Avenue NE (east of I-5) just south of NE 185th Street to meet 25 miles per hour (mph) design speed requirements instead of the existing posted speed of 30 mph. The deviation would apply for both directions. The horizontal curve is designed with a 250 ft radius to meet the design speed of 25 mph. A 300 ft radius is required to meet a design speed of 30 mph. Drawings of the proposal and sight distance exhibits are provided in Exhibit 3a and 3b, respectively, in Attachment CC.
Justification	As arterial roadways, both NE 185th Street and 5th Avenue NE are currently designed to 30 mph design/posted speed requirements. Per SMC 20.30.290(B), Sound Transit is proposing to reduce design speed on the curves of 5th Avenue NE to 25 mph at the intersection with NE 185th Street. This would be consistent with the City Engineer's intent to calm traffic around the station and garage by slowing vehicles approaching NE 185th Street in the northbound direction. In the southbound direction the reduced design speed will have no impacts to traffic functions, all users will be going at reduced speeds through the tee intersection at NE 185th St and 5th Ave NE. A higher design speed would require a larger horizontal curve, which in turn, would require additional private property acquisition. Adequate horizontal sight distance would be provided at both intersections to see the traffic signals. The authorization of this deviation would be consistent with the implementation of the Comprehensive Plan by providing road improvements that support safe multimodal options in near the station and garage. This deviation would not conflict with the critical areas regulations or Shoreline Master Program since no critical areas or shorelines are within the area of deviation. This deviation meets International Fire Code and would have no impacts on fire protection objectives. This deviation would thus (a) conform to the intent and purpose of the Code; (b) produce a compensating

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	or comparable result which is in the public interest; and (c) meet the objectives of safety, function and maintainability based upon sound engineering judgement. Furthermore, the deviation will not be materially detrimental to the public welfare or injurious or create adverse impacts to the property or other properties and improvements in the vicinity and in the zone in which the subject property is situated.
Deviation No. 4 – Other Deviations in NE 185th Street Vicinity.	
Standard to Deviate From	**EDM Section 7.7(A) – Frontage Improvements.** *Standard frontage improvements consist of right-of-way dedication, curb, gutter, sidewalk, amenity zone and landscaping, drainage improvements, and pavement overlay up to one-half of each right-of-way abutting a property as defined in the Master Street Plan. Additional improvements may be required to ensure safe movement of traffic, pedestrians, bicycles, transit, and non-motorized vehicles. The improvements can include transit bus shelters, bus pullouts, utility undergrounding, street lighting, signage, and channelization.*
Deviation Request	On 5th Avenue NE (south of NE 185th Street). Relocated street to alternate cross section as designed per direction from the City (Exhibit 4b in Attachment CC). Standard 66-foot right-of-way or more as designed. A drawing of the proposed improvements is provided in Exhibit 4a in Attachment CC. Specifics of the proposed frontage improvements on 5th Ave are summarized below: • On 5th Avenue NE (south of NE 185th Street) beginning on LL-224 west side. Dedication to bring west portion of 5th Ave right-of-way up to Standard. Shared use path adjacent to noise wall as designed in lieu of sidewalk and amenity zone on west side of 5th Avenue NE in front of LL224, 226, 227, and 228. Shared use path with modified amenity zone on west side in lieu of standard sidewalk and on-street bike lanes south of pedestrian crossing as designed. Mid-block pedestrian crossing provided. • On 5th Avenue NE (South of NE 185th Street) beginning on LL-229 east side. Standard frontage improvements north to LL222.4. No on-street bike lanes north of mid-block pedestrian crossing. No sidewalk or amenity zone north of LL222.4. Midblock crossing facilitates pedestrian and bicycle access to shared use path and NE 185th street beyond. • At NE 185th Street and 8th Avenue NE roundabout. Provide widened 10-foot sidewalk in lieu of amenity zone at NE and SE corner of roundabout to avoid adverse property impacts.
Justification	Per SMC 20.30.290(B), this deviation to modify portions of the amenity zone would not be materially detrimental to the public welfare, or injurious, or create adverse impacts on surrounding properties. The above-described deviations would (a) conform to the intent and purpose of the Code; (b) produce a compensating or comparable result which is in the public interest; and (c) meet the objectives of safety, function and maintainability based upon sound engineering judgement consistent with the engineering deviation criteria. The City and Sound Transit are in coordination to identify compensating and comparable opportunities in the public interest to accomplish the City's goals to provide nonmotorized connectivity paralleling the guideway through share use paths for pedestrians and bicyclists. The authorization of this deviation would be consistent with the implementation of the Comprehensive Plan by providing road improvements that support safe

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	multimodal options in near the station and garage. This deviation would not conflict with the critical areas regulations or Shoreline Master Program since no critical areas or shorelines are within the area of deviation. This deviation meets International Fire Code and would have no impacts on fire protection objectives.
Deviation No. 5 – Site Specific Cross Section Dimension Deviation	
Standards to Deviate From	**EDM Section 7.7(A) – Frontage Improvements.** *Standard frontage improvements consist of right-of-way dedication, curb, gutter, sidewalk, amenity zone and landscaping, drainage improvements, and pavement overlay up to one-half of each right-of-way abutting a property as defined in the Master Street Plan. Additional improvements may be required to ensure safe movement of traffic, pedestrians, bicycles, transit, and non-motorized vehicles. The improvements can include transit bus shelters, bus pullouts, utility undergrounding, street lighting, signage, and channelization.*
Deviation Request	Deviate from the standard frontage improvement requirements in a number of locations due to existing constraints or alternative improvements approved by the City. Drawings of these proposed improvements are provided in Exhibit 5 in Attachment CC. • Along NE 145th Street at 5th Avenue NE – 7-foot sidewalk without amenity zone provided adjacent to right turn lane. The narrower cross section is required to avoid impacts to an existing Seattle Public Utilities pump station on the north side of NE 145th Street and to reduce impacts to Jackson Park on the south side, which is subject to federal 4(f) protections. The roadway alignment and channelization of lanes have been shifted south to the maximum extent feasible without causing reconstruction of the NE 145th Street / 5th Avenue NE intersection. • At the end of NE 149th Street, the standard for a cul-de-sac is 90'-diameter bulb, curb, gutter, sidewalk walk, and amenity zone. A shared-use path will be constructed elsewhere in the City in lieu of the sidewalk and amenity zone, consistent with code modification No. 4, which will provide public benefits to non-motorized traffic. This deviation will provide an 80'-diameter cul-de-sac bulb. • Along 3rd Avenue NE north of NE 151st Street – Construct 14-foot shared use sidewalk along frontage for parcels LL165, LL166 and LL167 in lieu of amenity zone and 12-foot dedication. • At the end of 3rd Ave NE north of NE 152nd construct a shared-use path elsewhere in the city in lieu of an amenity zone and sidewalk on west side as detailed in code modification No. 4. Construct 14-foot wide pavement in place of the existing gravel access driveway in the 3rd Ave NE right-of-way north of NE 152nd, deviating from the standard half-street frontage improvements. • Along 1st Avenue NE south of NE 159th Street – Nonstandard frontage cross section consisting of 14-foot shared use path on west side of the roadway and no frontage improvements on the east side. Frontage improvements on

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	the north side of NE 159th Street consist of 5-foot amenity zone and 5-foot sidewalk connecting into new shared use path. No frontage improvements on south side of NE 159th Street. • Intersection at NE 170th and 1st Avenue NE remains an uncontrolled intersection as it exists today. 5-foot sidewalks and 8-foot amenity zones proposed around west side of intersection matching into existing sidewalks and amenity zone widths. • Along 1st Avenue NE, from NE 172nd Street to NE 174th Street, the roadway width is reduced to 22 feet to accommodate the construction of a 12-foot-wide shared use path between the guideway and roadway. 5'-foot amenity zone and 5'-foot sidewalk constructed on east side of roadway. • At the west street end of NE 178th Street east to 2nd Place NE, construct 20-foot wide paved road on the north half of the ROW, deviating from the standard half street frontage improvements. Dedication of the south half standard ROW not required because it is not needed for future frontage improvements. Construct a shared-use path elsewhere in the City in lieu of amenity zone and sidewalk along the noise wall as detailed in code modification No. 4.
Justification	Per SMC 20.30.290(B), this deviation to modify portions of the amenity zone, sidewalk, and roadway configurations would not be materially detrimental to the public welfare, or injurious, or create adverse impacts on surrounding properties. The above-described deviations would (a) conform to the intent and purpose of the Code; (b) produce a compensating or comparable result which is in the public interest; and (c) meet the objectives of safety, function and maintainability based upon sound engineering judgement consistent with the engineering deviation criteria. The City and Sound Transit are in coordination to identify compensating and comparable opportunities in the public interest to accomplish the City's goals to provide nonmotorized connectivity paralleling the guideway through shared use paths for pedestrians and bicyclists. The locations discussed above generally do not have sufficient space available to provide both the shared use path and standard frontage improvements as required in the EDM. A strict application of the above requirements would impair the public benefits to be provided by the shared use paths in order to meet the requirements for frontage improvements. Authorization of this deviation would be consistent with implementation of the land use and transportation goals and policies of the Comprehensive Plan since the proposed deviation would provide beneficial road improvements, while at the same time, reduce private property impacts. In addition, this deviation would not conflict with the critical areas regulations or Shoreline Master Program since no critical areas or shorelines are located within the area of deviation. This deviation meets International Fire Code and would have no impacts on fire-protection objectives.
Deviation No. 6 – Alternate Dedication & Path in Lieu of Standard Facilities.	
Standards to Deviate From	**EDM Section 7.7(A) – Frontage Improvements.** *Standard frontage improvements consist of right-of-way dedication, curb, gutter, sidewalk amenity zone and landscaping, drainage improvements, and pavement overlay up to one-half of each right-of-way abutting a property as defined in the Master Street Plan. Additional*

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	improvements may be required to ensure safe movement of traffic, pedestrians, bicycles, transit, and non-motorized vehicles. The improvements can include transit bus shelters, bus pullouts, utility undergrounding, street lighting, signage, and channelization. **EDM Section 12.6 – Street End** *Streets end in a cul-de-sac, an eyebrow, or a hammerhead – See Standard Plan 209 Street Ends. A hammerhead per Standard Plan 209 Street Ends may be used to fulfill the requirement to provide a turnaround facility where the street serves (or will serve) four or fewer single family residential units.* **EDM Appendix F –Master Street Plan** *The 2011 Master Street Plan identifies specific roadway cross-sections for all Arterial Streets and Local Primary Streets in the City of Shoreline. It is intended to guide the development of streets throughout the City. The planned cross-sections for these streets establish the location of future curbs so that streets can be constructed in the proper location.*
Deviation Request	Modify the standard frontage improvement, street end improvements, and/or Master Street Plan requirements in a number of locations to instead provide a nearby shared use path, consistent with Item No. 4 in the modification / waiver requests in Section 6.3, above. Drawings of these proposed improvements are provided in Exhibit 6 in Attachment CC. • At NE 161st Street end, 5-foot amenity zone and 8-foot sidewalk provided on north side of roadway and cul-de-sac only and connects into shared use path west of street end. Shared use path construction provided in lieu of amenity zone and sidewalk on west and south side of cul-de-sac. This design also avoids additional property impacts on south side of cul-de-sac. • At the west street end of NE 180th Street, construct skewed hammerhead turnaround, without frontage improvements, and construct shared use path west of hammerhead. • At the end of NE 189th Street, construct a section of shared use path in North Shoreline Station site and hammerhead turnaround in lieu of the standard frontage improvements and street end treatment on NE 189th Street at LL-264 and LL-265. • At the end of NE 195th Street, construct an offset-style hammerhead in lieu of a standard street end treatment and a shared use path connection to non-motorized use bridge in lieu of standard frontage improvements and street end treatments on LL267.1, LL-267.2 and LL-266.
Justification	Per SMC 20.30.290(B), this deviation to modify portions of the amenity zone would not be materially detrimental to the public welfare, or injurious, or create adverse impacts on surrounding properties. The above-described deviations would (a) conform to the intent and purpose of the Code; (b) produce a compensating or comparable result which is in the public interest; and (c) meet the objectives of safety, function and maintainability based upon sound engineering judgement consistent with the engineering deviation criteria. The City and Sound Transit are in coordination to identify compensating and comparable opportunities in the public interest to accomplish the City's goals to provide nonmotorized connectivity paralleling the guideway through shared use paths for pedestrians and bicyclists. The locations discussed above, where surplus space is available, have been identified as

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	potential locations for shared use paths; however, sufficient space is not available to provide both the path and standard frontage improvements as required in the EDM. A strict application of the above requirements would impair the public benefits to be provided by the shared use paths in order to meet the requirements for frontage improvements. Regarding the offset style hammerhead at NE 195th Street, per SMC 20.30.290(B), a conventional hammerhead design at the end of NE 195th Street would require the full take of an additional residential property. Instead, Sound Transits proposes a deviation to provide an offset-style hammerhead, as shown in Drawing No. L200-N18-CRP145, which can utilize a property on the north side of NE 195th Street that Sound Transit is already acquiring for the project. In addition, this would allow the fire department to turn around on an existing street that has no facility. The offset-style hammerhead allows the existing NE 195th Street pedestrian bridge path (not ADA compliant grades) to be rebuilt to meet ADA grades. Turning movements provided in the Civil Roadway Calculations package illustrate how the offset style of hammerhead meets the same functionality of the standard hammerhead shown in the EDM. Authorization of this deviation would be consistent with implementation of the land use and transportation goals and policies of the Comprehensive Plan since the proposed deviation would provide beneficial road improvements, while at the same time, reduce private property impacts. In addition, this deviation would not conflict with the critical areas regulations or Shoreline Master Program since no critical areas or shorelines are located within the area of deviation. This deviation meets International Fire Code and would have no impacts on fire-protection objectives.
Deviation No. 7 – Restoration of two existing residential driveways (parcel LL-200)	
Standards to Deviate From	**EDM Section 10.2 – Access Provision. (B, C)** *B. No more than one access shall be provided to an individual parcel, or to contiguous parcels under the same ownership, or to parcels that are included in the same subdivision or project, unless approved by the City Engineer. Additional access may be granted to contiguous parcels if they meet minimum spacing requirements or if a Traffic Engineering Study acceptable to the City Engineer demonstrates that the additional access will not adversely affect safe operation of the street.* *C. Minimum Spacing: The minimum distance between access connections is 50 feet on the same side of the street.*
Deviation Request	Roadway realignment and reconstruction on 1st Avenue NE south of NE 174th Street involves reconstructing driveway connections to a number of existing residential driveways. Parcel LL200 has two existing driveways today, which is one more than currently permitted by the EDM. One 10-foot-wide driveway is to a carport and one 8-foot-wide driveway is to a parking space in front of a former garage that appears to have been converted to living space. The project proposes to reconnect both existing driveways with 10' wide driveway approaches, they will be 34 feet apart. Drawings of these proposed improvements are provided in Exhibit 7 Attachment CC.
Justification	Per SMC 20.30.290(B), this deviation to allow this parcel continued use of a second driveway would not be materially detrimental to the public welfare, or injurious, or create adverse impacts to the property or other properties. As proposed, this deviation would (a) conform to the intent and purpose of the Code; (b) produce a compensating or comparable result which is in the public interest; and (c) meet the objectives of safety, function and maintainability based upon sound engineering judgement consistent with the engineering deviation criteria. Allowing this driveway

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	to remain will not adversely affect the implementation of the Comprehensive Plan. If the property was to redevelop in the future, they would be held to current EDM standards and only one driveway would be permitted. This deviation also meets International Fire Code and would have no impacts on fire protection objectives.