

**ATTACHMENT E: LYNNWOOD LINK EXTENSION RECORD  
OF DECISION**

# LYNNWOOD LINK EXTENSION

Record of Decision



 **SOUNDTRANSIT**

 U.S. Department of Transportation  
Federal Transit  
Administration

JULY 2015



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## Acronyms and Abbreviations

ABA	Architectural Barriers Act
ADA	Americans with Disabilities Act
BMP	best management practice
CFR	Code of Federal Regulations
CZM	Coastal Zone Management
DOT	Department of Transportation
Ecology	Washington State Department of Ecology
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FTA	Federal Transit Administration
HOV	high-occupancy vehicle
I-5	Interstate 5
LWCF	Land and Water Conservation Fund
Magnuson-Stevens Act	Magnuson-Stevens Fisheries Conservation and Management Act
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
OMF	Operations and Maintenance Facility
OMSF	Operations and Maintenance Satellite Facility
PGIS	pollution-generating impervious surface
PSRC	Puget Sound Regional Council
RCO	Recreation and Conservation Office
ROD	Record of Decision
SEPA	State Environmental Policy Act
SHPO	State Historic Preservation Officer
Sound Transit	Central Puget Sound Regional Transit Authority
SR	State Route
ST2	Sound Transit 2
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
WSDOT	Washington State Department of Transportation



# 1 DECISION

The Federal Transit Administration (FTA), pursuant to 23 Code of Federal Regulations (CFR) 771.127, issues this Lynnwood Link Extension Record of Decision (ROD) finding that the requirements of the National Environmental Policy Act (NEPA) have been satisfied for the construction of the Lynnwood Link Extension by the Central Puget Sound Regional Transit Authority (Sound Transit). This ROD also provides findings on other environmentally related federal statutory requirements.

This ROD is based on the close review and independent evaluation of the planning and environmental process followed by Sound Transit that involved numerous cooperating and participating agencies, listed below, in developing project alternatives and evaluating their effects.

## Cooperating Agencies

Federal Highway Administration  
 Washington State Department  
 of Transportation  
 U.S. Army Corps of Engineers  
 City of Edmonds  
 City of Lynnwood  
 City of Mountlake Terrace  
 City of Seattle  
 City of Shoreline  
 King County  
 Snohomish County

## Participating Agencies

Department of Interior  
 U.S. Fish and Wildlife Service  
 U.S. Environmental Protection Agency  
 National Oceanic and Atmospheric Administration  
 Homeland Security/Transportation Security Administration  
 Advisory Council on Historic Preservation  
 Federal Emergency Management Agency  
 Federal Railroad Administration  
 National Park Service  
 Seattle City Light  
 Washington Department of Archaeology and Historic  
 Preservation  
 Washington Department of Fish and Wildlife  
 Washington State Department of Ecology  
 Puget Sound Regional Council  
 Community Transit  
 Everett Transit  
 City of Mill Creek

This process has produced the *Lynnwood Link Extension Draft Environmental Impact Statement* (July 2013) and the *Lynnwood Link Extension Final Environmental Impact Statement* (April 2015) and has led to the determinations made herein (collectively referred to as the “environmental review documents”).

This ROD summarizes the Lynnwood Link Extension project; the factors and process that led to its development; the alternatives that FTA considered; the various opportunities to comment on the project and project documents; the public, tribal, and agency comments and responses thereto; the basis for FTA’s decision; and the mitigation measures the project requires. The ROD does not replace or negate any of the information or descriptions in the environmental review documents. Rather, the ROD and the environmental review documents (incorporated herein by reference) are part of the FTA environmental record for the project.



**Based on its consideration of the environmental review documents, FTA finds that the project has met all applicable requirements. FTA further finds that this ROD is complete and supports the determination that all NEPA requirements have been met.**

FTA expects the Federal Highway Administration to issue a separate record of decision to support actions it will take regarding the project. FTA expects those actions to include at least an Interchange Justification Report; an airspace lease for use of interstate right-of-way; breaks in access, including those determined necessary during the design process, as well as those requested during construction; and an operations and maintenance agreement related to interstate right-of-way use.

## 1.1 Project Description

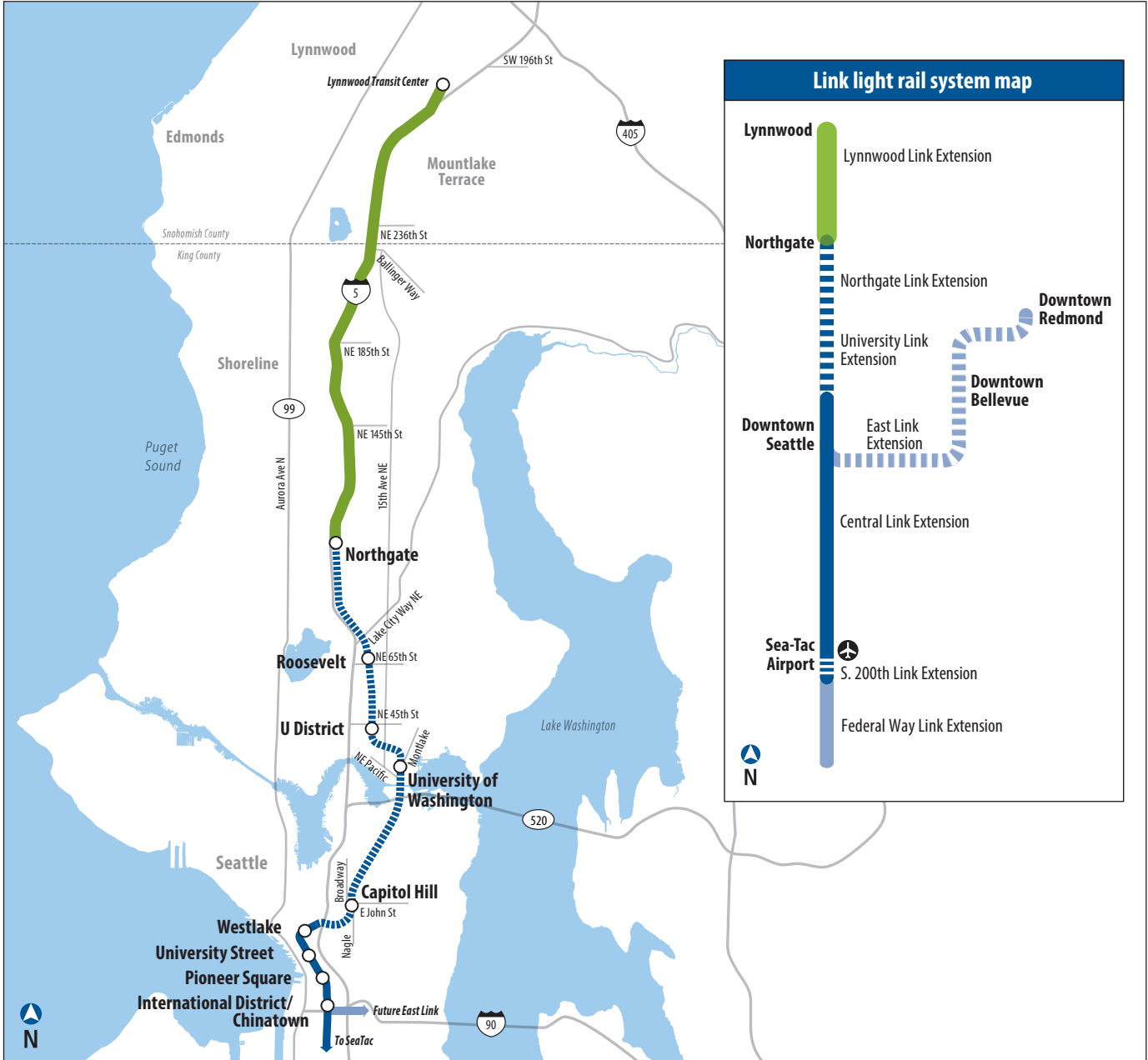
The Lynnwood Link Extension will extend the Sound Transit Link light rail system from Northgate in Seattle north into Shoreline, Mountlake Terrace, and Lynnwood in Snohomish County. It will help implement the Puget Sound Regional Council's (PSRC) VISION 2040 (PSRC 2009, updated 2014) and the Sound Transit Regional Transit Long Range Plan (Sound Transit 2005a, updated 2014) and is part of the Sound Transit 2 (ST2) Plan of regional transit investments. The 8.5-mile project corridor generally follows Interstate 5 (I-5), the major north-south freeway through the state and the primary route serving a large commuter market in one of the most densely developed urbanized areas in the Pacific Northwest. Figure 1 shows the regional setting, Figure 2 shows the project from Northgate to Lynnwood, and Figures 3 and 4 show the project by segment.

The project approved in this ROD is substantially the same as the Preferred Alternative evaluated in the Final Environmental Impact Statement (EIS). The Final EIS describes in detail the Preferred Alternative's alignment and the other project components, including:

- Traction power substations along the project alignment
- Noise walls to avoid transit noise impacts
- Relocation of existing noise walls
- Relocation of underground and overhead utilities
- Crossover tracks
- Stormwater management facilities
- Park-and-ride facilities
- Intersection, street, and sidewalk improvements

The final alignment selected in this ROD differs from that of the Final EIS Preferred Alternative in these respects:

- Segment A – the project would cross over NE 130<sup>th</sup> Street on elevated structure, rather than in a retained cut, and it would not rebuild the NE 130<sup>th</sup> Street bridge and ramps. It also includes basic infrastructure for a potential future elevated station at NE 130<sup>th</sup> Street.
- Segment B – the project includes basic infrastructure for a potential future elevated station near 220<sup>th</sup> Street SW with a 200-space surface parking lot to the west, and it would not modify the I-5 southbound on- and off-ramps.



DATA SOURCES: (Sound Transit)

**Legend**

- Lynnwood Link Extension
- Link in service
- Under construction
- In planning
- In design

**Figure 1**  
Regional Setting for the Lynnwood Link Extension



- Lynnwood Link Extension
- Station Location
- Potential Future Station
- Roadway
- Local Street
- City Boundary
- County Boundary
- Park
- Waterbody

**Figure 2**  
The Project by Segment

Lynnwood Link Extension



**SEGMENT A:**  
**AT-GRADE/ELEVATED WITH NE 145th**  
**AND 185th STATIONS**

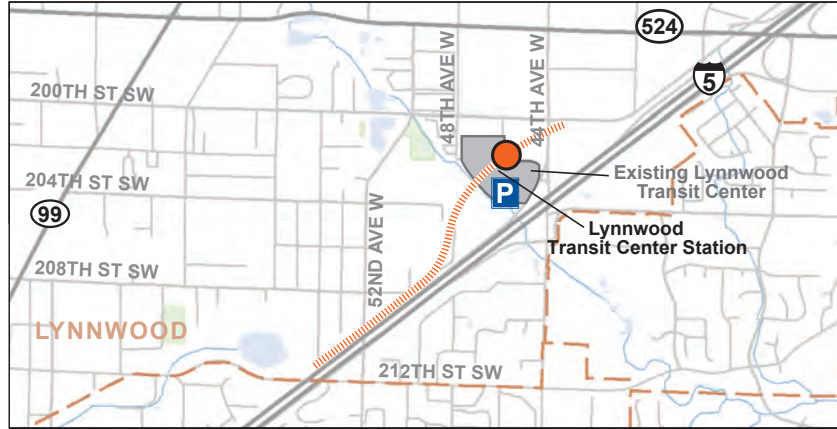


**SEGMENT B:**  
**EAST SIDE TO MOUNTLAKE TERRACE TRANSIT**  
**CENTER TO WEST SIDE**










- |   |                 |
|---|-----------------|
| Elevated  | Roadway         |
| At-Grade  | Local Street    |
| Station   | City Boundary   |
| Low-Cost Improvements to Allow Potential Future Station | County Boundary |
| Parking Structure                                       | Park            |
| Surface Parking   | Waterbody       |

**Figure 3**  
**Segments A and B**

Lynnwood Link Extension



**SEGMENT C:  
WEST SIDE TO LYNNWOOD TRANSIT CENTER STATION**

- |   |   |
|---|---|
|  Elevated  |  Roadway         |
|  At-Grade  |  Local Street    |
|  Station   |  City Boundary   |
|  Low-Cost Improvements to Allow Potential Future Station |  County Boundary |
|  Parking Structure                                       |  Park            |
|  Surface Parking   |  Waterbody       |

**Figure 4**  
Segment C

Lynnwood Link Extension

**Segment A**

The route will begin on an elevated guideway at the terminus of the Northgate Link Extension. It will cross over 1st Avenue NE, enter the I-5 right-of-way, continue on an elevated guideway over NE Northgate Way adjacent to the east side of I-5, and proceed in a combination of retained cut, retained fill, and elevated structures. It will continue along the east side of I-5, partially in the interstate right-of-way and partially on adjacent properties, crossing over NE 130th Street to NE 145th Street. The project includes infrastructure to support a potential future elevated station at NE 130th Street.

The route will have an elevated station just north of NE 145<sup>th</sup> Street, with an approximately 500-stall parking garage and bus transfer facilities. Sound Transit will reconfigure interstate ramps to accommodate the station, garage, and bus facilities. The project improves intersections in the station area by adding turn lanes and related street and signalization improvements and creates a new signalized intersection for the ramp on 5th Avenue NE. The route will continue along the east side of I-5 to NE 185<sup>th</sup> Street, as before in a combination of retained cut, retained fill, and elevated structures, partially in the interstate right-of-way and partially on adjacent properties.

There will be a retained cut station and bus transfer facilities just north of NE 185th Street and east of I-5. An approximately 500-stall parking garage will be provided in the interstate right-of-way on the west side of I-5. Sound Transit will improve pedestrian connections between the station and garage, either on or adjacent to the existing NE 185th Street bridge over I-5.

**Segment B**

The route will proceed along the east side of I-5 in a combination of retained cut, retained fill, and elevated structures, partially in the interstate right-of-way and partially on adjacent properties, to the Mountlake Terrace Transit Center at 236th Street SW. The existing transit center will be reconfigured to accommodate an elevated station bridging over 236th Street SW.

The route will continue on an elevated guideway and cross to the west side of I-5. It will then proceed in a combination of retained cut, retained fill, and elevated structures over 220th Street SW, partially in the interstate right-of-way and partially on adjacent properties. The project includes infrastructure to support a potential future elevated station near 220th Street SW with a 200-space surface parking lot to the west.

**Segment C**

The route will proceed along the west side of I-5 in a combination of retained cut, retained fill, and elevated structures to approximately 50th Avenue W, where it will turn north to cross over the Interurban Trail and Scriber Creek on an elevated guideway and enter the Lynnwood Park-and-Ride lot.

The terminus will have an elevated station and an adjacent parking garage with about 1300 stalls, which will increase total Lynnwood Park-and-Ride capacity to approximately 1,900 stalls. Elevated tail tracks for train layover and turn-back operations will extend beyond the station and over 44th Avenue W.

## **Operations and Maintenance Satellite Facility**

Sound Transit plans to construct and operate a Link Operations and Maintenance Satellite Facility (OMSF) to support light rail operations and maintenance needs for the ST2 program of projects across the Sound Transit district, including the Lynnwood Link Extension. The new OMSF would operate in conjunction with Sound Transit's existing Forest Street Operations and Maintenance Facility (OMF) in Seattle to support the 80 additional light rail vehicles required for ST2's expanded system. Sound Transit and FTA issued a separate Draft EIS for this facility in May 2014 and are now preparing its Final EIS.

Sound Transit does not require the OMSF in order to build and operate the Lynnwood Link Extension, although the OMSF is needed to operate Lynnwood Link at the level of light rail service assumed for the ST2 program and in the Final EIS. If the OMSF is delayed or not constructed, Link operation and maintenance could occur exclusively at the Forest Street OMF.

## **1.2 Basis for the Decision**

### **1.2.1 Planning and Project Development Process**

Many years of planning and past investments have focused on the need for effective regional transit serving this corridor's communities. The "Forward Thrust" regional transit system proposals of the late 1960s and early 1970s included fixed guideway transit along the I-5 corridor in King County, but funding was defeated at the polls. Since then, a largely commuter-oriented transit system comprising express bus infrastructure and services has developed to serve sustained population and employment growth along the I-5 corridor, helping to connect Snohomish County suburban residents to jobs in Seattle. Sound Transit and other agencies (WSDOT, Community Transit, King County Metro) have supported express bus service with investments in high-occupancy vehicle (HOV) lanes, park-and-ride facilities, transit centers, direct access ramps, and freeway transit stations.

The region renewed its efforts to develop mass transit service connecting Seattle and Snohomish County in the 1990s. In 1993, the Central Puget Sound Regional Transit Authority (Sound Transit) was created, and in 1995 it made the Lynnwood Link Extension project corridor part of a large proposal for developing regional light rail connecting King, Pierce, and Snohomish counties; however, the voters did not approve that program. The following year, voters approved financing for a scaled-back program known as *Sound Move* that included light rail in King County, improved regional express bus services, commuter rail, and related facilities. After completing a Long-Range Plan Update in 2005, Sound Transit defined a second phase of investments, and voters approved the financing for the resulting ST2 program in 2008. The ST2 program defined the general scope for a project connecting Northgate to Lynnwood.

The environmental process for the Lynnwood Link Extension (previously known as the North Corridor Transit Project) began with an Alternatives Analysis in 2010 and 2011. On September 29, 2011, the Notice of Intent to prepare an EIS was published and the Draft EIS scoping period began. The Draft EIS was published in July 2013.

After the publication of the Draft EIS and the close of the public comment period, the Sound Transit Board considered the Draft EIS information, public comments

received, and supporting briefing materials, and with Motion M2013-96, the Board identified a Preferred Alternative for evaluation in the Final EIS. The Final EIS was issued April 3, 2015. On April 23, 2015, the Sound Transit Board passed Resolution 2015-05, selecting the project to be built.

### 1.2.2 Purpose and Need

The purpose of the Lynnwood Link Extension is to expand the Sound Transit Link light rail system from Northgate in Seattle north into Shoreline, Mountlake Terrace, and Lynnwood in Snohomish County in order to:

- Provide reliable, rapid, and efficient peak and off-peak two-way transit service of sufficient capacity to meet the existing and projected demand for travel to and from the corridor communities and other urban centers in the Central Puget Sound area.
- Create an alternative to travel on congested roadways, and improve connections to the regional multimodal transportation system.
- Support the adopted land use, transportation, and economic development plans of the region and the corridor communities.
- Advance the long-range vision, goals, and objectives for transit service established by the Sound Transit Long-Range Plan for high-quality regional transit service connecting major activity centers in King, Pierce, and Snohomish counties.
- Implement a financially feasible system that seeks to preserve and promote a healthy environment.

The project is needed to:

- Address increasingly unreliable travel times for transit trips that now rely on the corridor's highly congested roadways and HOV lanes.
- Address overcrowding caused by insufficient transit capacity.
- Create a reliable alternative to automobile trips on I-5 and State Route (SR) 99, the two primary highways serving the project corridor, which are unreliable and over capacity throughout large portions of the day.
- Increase mobility, access, and transportation capacity for the 20 percent growth in population and 40 percent growth in employment projected in the regional growth and activity centers in the corridor and the region, consistent with PSRC's *VISION 2040* and *Transportation 2040*, as well as related county and city comprehensive plans.
- Create the transit infrastructure needed to support the development of Northgate and Lynnwood—the corridor's two designated regional growth centers.
- Advance the Sound Transit Long-Range Plan for a future extension of mass transit north to Everett.



- Ensure long-term regional mobility, multimodal connectivity, and convenience for the corridor’s citizens and communities, which include travel-disadvantaged residents and low-income and minority populations.
- Help the state and region reduce transportation-related energy consumption and reduce harmful greenhouse gas emissions in the atmosphere, in accordance with state laws.

## 2 ALTERNATIVES CONSIDERED IN THE FINAL EIS

### 2.1 No Build Alternative

The No Build Alternative provided a basis for comparing impacts among alternatives. It represented the transportation system and environment as they would exist without the project. The No Build Alternative assumed other committed highway, transit, and nonmotorized projects identified in PSRC’s *Transportation 2040* as amended in 2014, including ST2 extensions and facilities other than the light rail extension from Northgate to Lynnwood. The No Build Alternative also assumed population and employment growth as estimated by PSRC through 2035.

### 2.2 Light Rail Alternatives

The light rail alternatives were analyzed in three geographic segments: Segment A, Seattle to Shoreline; Segment B, Shoreline to Mountlake Terrace; and Segment C, Mountlake Terrace to Lynnwood. The alternatives generally followed the I-5 corridor from the Northgate Transit Center in Seattle to the Lynnwood Transit Center. Figure A-1 in Appendix A to this ROD shows all the alternatives evaluated in the Final EIS, and Figures A-2 and A-3 show the alternatives by segment.

**Segment A: Seattle to Shoreline.** There were seven Segment A alternatives between Northgate in Seattle and NE 185th Street in Shoreline, all on the east side of I-5. They included at-grade and elevated alignments, each with two or three stations, and some with park-and-ride facilities. The EIS analyzed combinations of potential stations at NE 130th Street, NE 145th Street, NE 155th Street, and NE 185th Street.

**Segment B: Shoreline to Mountlake Terrace.** There were four Segment B alternatives between NE 185th Street in Shoreline and 212th Street SW in Mountlake Terrace. Each alternative began on the east side of I-5 and ended either in the I-5 median or on the west side of I-5 just north of 212<sup>th</sup> Street SW. These alternatives included a station with a park-and-ride serving the existing Mountlake Terrace Transit Center (236th Street SW) and potentially an additional station at 220th Street SW.

**Segment C: Mountlake Terrace to Lynnwood.** Segment C had four alternative routes going from the northern end of Segment B to a northern terminus station with park-and-ride facilities at or near the existing Lynnwood Transit Center at 200th Street SW.

### **3 MEASURES TO MINIMIZE HARM AND PROJECT COMMITMENTS**

Sound Transit has designed the project to avoid and minimize harm. In addition, the Final EIS identifies many mitigation measures that Sound Transit will take. Appendix B, Mitigation Plan, which is incorporated herein by reference, summarizes the mitigation measures that are required of Sound Transit under this ROD. Sound Transit will ensure that all environmental mitigation identified in this ROD is implemented unless it receives concurrence from the FTA to do otherwise.

Sound Transit shall meet the conditions of all applicable state, federal, and local permits and approvals that are required to allow construction and operation; observe best management practices (BMPs); and implement the mitigation measures developed to address specific impacts as identified in Appendix B.

The mitigation measures described in Appendix B are conditions of this Lynnwood Link Extension ROD. These measures will be incorporated in contracts that may be awarded for construction of the project and will be relied upon by other federal permitting agencies. FTA considers the mitigation measures to be material conditions of this ROD and will incorporate them in any future grant agreement that FTA may award Sound Transit for the construction of the Lynnwood Link Extension. FTA finds that with the accomplishment of these mitigation commitments, Sound Transit will have taken all reasonable, prudent, and feasible means to avoid or minimize environmental harm from this project.

### **4 MONITORING AND ENFORCEMENT**

To ensure compliance with required mitigation and to assist with FTA oversight, Sound Transit will establish a mitigation monitoring program for the project that will track, monitor, and report the status of the environmental mitigation actions identified in the ROD to FTA on a quarterly schedule. This monitoring program will be approved by FTA and may, upon FTA approval, be revised as necessary during the permitting process in order to implement mitigation measures during final design and construction.

### **5 OPPORTUNITIES TO COMMENT**

Since the Lynnwood Link Extension was initiated in 2010, Sound Transit and FTA have provided frequent opportunities for interested members of the public, agencies, and tribes to engage, share concerns, and discuss specific project details with Sound Transit staff. Public involvement activities to date have included public, agency, and tribal meetings; online meetings; stakeholder briefings; rotating information kiosks in the community; email subscription list; project Web site; printed materials; and resident, business, and property owner contacts. For more information, see Chapter 6, Public Involvement and Agency Coordination, in the Final EIS.

The public involvement and agency coordination effort for what is now the Lynnwood Link Extension began in October 2010, when FTA and Sound Transit began early scoping for the North Corridor Project Alternatives Analysis. They invited participation in early scoping by means of public notices in the Federal Register and State Environmental Policy Act (SEPA) Register, advertisements and legal notices in local newspapers, postcard mailings, and email messages. They held three public meetings

(one each in Seattle, Shoreline, and Lynnwood) and one agency meeting during the early scoping period. FTA and Sound Transit asked the public to submit suggestions about the transportation problems of the project corridor and to propose a broad range of potential transit solutions.

The NEPA scoping phase for the Draft EIS for the Lynnwood Link Extension started September 29, 2011, with the Federal Register notice of the intent to prepare an EIS. The formal notices were accompanied by advertisements and other public notices and outreach materials. Scoping notice postcards were sent to 103,000 addresses, and emails were sent to 1,000 email addresses. During the scoping period, Sound Transit and FTA asked the public to comment on the proposed Purpose and Need Statement, the environmental issues to be evaluated in the Draft EIS, and alternatives to be considered for evaluation in the Draft EIS. To provide project information to the public during scoping, Sound Transit produced a Scoping Information Report, Coordination Plan, and Alternatives Analysis Report, which were available on the project Web site (<http://www.soundtransit.org/llc>) and at public meetings.

During the 30-day NEPA scoping period, Sound Transit and FTA again held public meetings in Seattle, Shoreline, and Lynnwood, and an agency meeting in Shoreline. They received 69 comment submittals from individuals, 14 from jurisdictions and agencies, and three from organizations. The comments received during scoping were summarized in Sound Transit's *Environmental Scoping Summary Report* (2011) and provided to the Sound Transit Board for consideration before the Board identified the alternatives for analysis in the EIS.

Sound Transit published the Notice of Availability of the Draft EIS in the Federal Register and SEPA Register. The public comment period for the Draft EIS ran from July 26, 2013 to September 23, 2013 and included four public open houses and public hearings. In addition to the Federal Register and SEPA Register notices, Sound Transit mailed notice postcards to 84,000 addresses. Sound Transit also advertised the comment period through emails, community calendar postings, and online and print display advertisements. Sound Transit collected written comments on the Draft EIS via mail, email, comment forms, and court reporter transcriptions of oral comments made during public hearings. Sound Transit received 634 comment documents (written, email, and hearing transcripts) during the comment period from agencies, tribes, and the public. They were reviewed by Sound Transit and FTA, and considered during development of the Final EIS.

The Final EIS was released on April 3, 2015 with a Notice of Availability published in the Federal Register and advertisements in the *Seattle Times*, *Everett Herald* and other publications, and with written notice to all parties who had requested a copy of the Draft EIS. Sound Transit also mailed postcards to 84,000 addresses, and used emails, community newspaper ads and posters to announce the Final EIS release. Sound Transit sent a copy of the Final EIS to parties who had commented on the Draft EIS.

## 5.1 Final EIS Comments

In the 30 days following the April 3, 2015 announcement of availability of the Final EIS in the Federal Register, Sound Transit and FTA received five letters with comments. Federal agencies generally wait 30 days after a Final EIS is released before making a decision on a proposed action, although regulations allow FTA to make decisions concurrent with a Final EIS release in some circumstances.

The following parties submitted written comments:

- City of Shoreline, April 9, 2015 (John Norris, Assistant City Manager) and May 4, 2015 (Shari Winstead, Mayor)
- Andy and Amy Walgamott, April 13, 2015
- Seattle Light Rail Review Panel, April 17, 2015 (Shannon Loew, Chair)
- U.S. Environmental Protection Agency (EPA), Region 10, May 4, 2015 (Christine Reichgott, Manager)

The letters primarily focused on matters related to features of the Preferred Alternative, and some encouraged further consideration of options that could reduce impacts. None of the letters contested the accuracy of the information in the Final EIS. The letters and FTA's responses are in Appendix C.

## 6 DETERMINATION AND FINDINGS

### 6.1 National Environmental Policy Act

Title 42, Sections 4321 through 4347 and 4372 through 4375 of the United States Code (USC), as well as Executive Order 11514, Protection and Enhancement of Environmental Quality, require that federal agencies evaluate the environmental impacts of their actions, integrate such evaluations into their decision-making processes, and implement appropriate policies.

The environmental record for the Lynnwood Link Extension includes the *Lynnwood Link Extension Draft EIS* (July 2013), the *Lynnwood Link Extension Final EIS* (April 2015), and the supporting materials incorporated therein. These documents represent the detailed statements required by NEPA describing:

- The environmental impacts of the proposed action.
- The adverse environmental effects that cannot be avoided, should the proposed action be implemented.
- Alternatives to the proposed action.
- Irreversible and irretrievable commitments of resources that will be involved should the proposed action be implemented.

Having carefully considered the environmental record, mitigation commitments (summarized in Appendix B of this ROD), public and agency comments, and the findings below, FTA has determined that:

- The environmental review documents include a record of: the environmental impacts of the proposal; adverse environmental effects that cannot be avoided; alternatives to the proposal; and irreversible and irretrievable impacts on the environment.
- The environmental process included cooperation and consultation with EPA Region 10.
- All reasonable steps have been taken to minimize adverse environmental effects of the proposed project.

- The project meets its purpose and need and satisfies the requirements of NEPA.

## **6.2 Executive Order 13175 Consultation and Coordination with Indian Tribes**

Under Executive Order 13175 and other federal authorities, FTA conducted government-to-government consultation and coordination with the following federally recognized tribes:

- Muckleshoot Indian Tribe
- Snoqualmie Tribe
- Stillaguamish Tribe of Indians
- Suquamish Tribe
- Tulalip Tribes
- Yakama Nation

In addition, consultation and coordination occurred with two non-federally recognized tribes under provisions of Section 106:

- Duwamish Tribe
- Snohomish Tribe of Indians

The Final EIS responds to and incorporates tribal comments and suggestions made in response to the Draft EIS.

FTA finds that the requirements of Executive Order 13175 have been met.

## **6.3 Executive Order 12372 Intergovernmental Review of Federal Programs**

Executive Order 12372 directs federal agencies to consult with and solicit comments from state and local governments whose jurisdictions will be affected by a federal action. As required by 23 USC 139, FTA asked agencies and tribes to comment on the purpose and need for the project, the range of alternatives to be considered, and the Draft EIS. FTA accepted comments and offered briefings to agencies and tribes during the scoping period, during the development of the Draft EIS, and during the preparation of the Final EIS. Several agencies and tribes reviewed and commented on the Draft EIS. Appendix P, Draft EIS Comments and Responses, in the Final EIS contains responses to all public and agency comments received during the Draft EIS comment period. Appendix C to this ROD contains comments on the Final EIS.

State and local agencies accepted invitations to be cooperating or participating agencies for the project, as discussed in Chapter 6, Public Involvement and Agency Coordination, of the Final EIS.

FTA finds that the requirements of Executive Order 12372 have been met.

## 6.4 Clean Air Act

Under the Clean Air Act, EPA has established National Ambient Air Quality Standards (NAAQS), which specify maximum allowable concentrations for certain criteria pollutants. Washington State and the Puget Sound Clean Air Agency have adopted these standards. Proposed transportation projects requiring federal funding or approval must demonstrate compliance with EPA's Transportation Conformity Rule (40 CFR Part 93). This rule requires showing that a project will not cause or contribute to any new violation of any NAAQS, increase the frequency or severity of any existing NAAQS violations, or delay timely attainment of the NAAQS.

This project meets project-level air quality conformity in accordance with state and federal regulations as follows:

- The project is included in PSRC's Regional Transportation Plan.
- The project is included in the current Transportation Improvement Plan.
- The project meets the local hot-spot conformity requirements. Because the project has been included in the modeling for the Regional Transportation Plan and the Transportation Improvement Plan, it demonstrates conformity to the State Implementation Plan. The project meets project-level conformity requirements because it will not cause any new NAAQS exceedance or worsen any existing one, and will not delay the timely attainment of any standard.

## 6.5 Clean Water Act and Executive Order 11990 on Protection of Wetlands

The Clean Water Act (33 USC § 1251 et seq.) establishes the basic structure for regulating discharges of pollutants (including dredged materials) into the waters of the United States, and for regulating quality standards for surface waters. It therefore applies to the project's wetland and stream impacts and stormwater discharges. Sound Transit must obtain a Section 404 permit from the U.S. Army Corps of Engineers. It may also need other state and local permits. The project will satisfy all requirements arising from these permits.

Accordingly, FTA finds that with the mitigation measures identified in Appendix B of this ROD, the project meets the requirements of the Clean Water Act (Section 404) and Executive Order 11990 on Protection of Wetlands.

## 6.6 Clean Water Act Sections 401 and 402

Discharges into water are addressed in the Clean Water Act in Section 401 and Section 402. Section 401 provides for EPA certification (delegated to the state) that a project's discharges to water or to wetlands will meet state water quality standards. Under Section 402, a discharge of domestic or industrial wastewater into marine or fresh surface water requires a National Pollutant Discharge Elimination System (NPDES) permit (including a General Construction Permit for applicable construction activities).

The project will not discharge any runoff from new point sources into a surface water body. Stormwater management will meet the requirements of the Washington State Department of Ecology (Ecology) *Stormwater Management Manual for Western Washington*. Within the Washington State Department of Transportation (WSDOT) right-of-way, Sound Transit will meet the requirements of the most recent *Highway Runoff Manual*.

Sound Transit will also meet the stormwater management requirements of local jurisdictions.

Sound Transit will treat all runoff from pollution-generating impervious surface (PGIS) with on-site water quality and flow control treatment before discharging it. Sound Transit shall obtain and comply with the requirements of a project-specific General Construction Permit, and will implement measures defined for the project through an approved Stormwater Pollution Prevention Plan.

Sound Transit will comply with any other required water quality permits and/or certifications.

Accordingly, FTA finds that with the mitigation measures identified in Appendix B of this ROD, the project meets the requirements of Sections 401 and 402 of the Clean Water Act.

## **6.7 Coastal Zone Management Act**

Within Washington's 15 coastal counties, projects with a federal nexus require Coastal Zone Management Act (16 USC §§ 1451-1462) consistency certification.

The project will not alter any areas within regulated shorelines; therefore, the project will be consistent with the Coastal Zone Management Act and the Shoreline Management Act, as well as the shoreline management plans of local jurisdictions.

## **6.8 Endangered Species Act**

The Endangered Species Act (ESA) (16 USC § 1531 et seq.) is intended to protect threatened and endangered species and the ecosystems on which they depend. When the federal government takes an action subject to the ESA, it must comply with Section 7 of the ESA. Section 7(a)(2) generally requires that any action authorized, approved, or funded by a federal agency is not likely to jeopardize the continued existence of any threatened or endangered species or adversely modify any designated critical habitat of such species. Federal agencies must consult with federal wildlife agencies to ensure that their actions satisfy these requirements.

FTA therefore consulted with the National Marine Fisheries Service (NMFS) and the U.S. Fish and Wildlife Service (USFWS) and submitted a Biological Assessment (BA) to these agencies on December 22, 2014. In a letter dated January 27, 2015, NMFS concurred with FTA's determination of "not likely to adversely affect" Chinook salmon and steelhead. The USFWS notified FTA on January 29, 2015 of its concurrence with the FTA's determinations of "no effect" for bull trout.

However, the BA assessed the Preferred Alternative, and the project to be built (as defined by the Sound Transit Board following the Final EIS) differs in some details from the Preferred Alternative. To confirm that these changes would not materially alter the ESA analysis, FTA directed Sound Transit to conduct an additional assessment of potential impacts to fish-bearing waters. The analysis findings continue to support the determination in the BA that construction and operation of the Lynnwood Link Extension may affect but is not likely to adversely affect Puget Sound Chinook Salmon and Puget Sound steelhead.

FTA finds that with the mitigation measures identified in Appendix B of this ROD, the project meets the requirements of the ESA.

## **6.9 Magnuson-Stevens Fisheries Conservation and Management Act**

The Magnuson-Stevens Fisheries Conservation and Management Act (16 USC § 1801 et seq.) requires federal fisheries management regulations to identify and conserve habitat that is essential to federally managed fish species. Essential fish habitat is defined as “those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity.”

FTA’s Biological Assessment determined that the project will not affect essential fish habitat used by Pacific salmon. NMFS concurred with this determination; accordingly, FTA finds the project meets the requirements of the Magnuson-Stevens Act.

## **6.10 Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act**

The Migratory Bird Treaty Act (16 USC § 703-712) prohibits taking, killing, or possessing native migratory birds. Sound Transit will coordinate with the USFWS to develop measures to avoid impacts to these birds. FTA finds that with the mitigation measures identified in Appendix B of this ROD, the project meets the requirements of the Migratory Bird Treaty Act.

## **6.11 Executive Order 12898 Environmental Justice**

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations (1994), directs federal agencies to identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations. Department of Transportation (DOT) Order No. 5610.2(a) to Address Environmental Justice in Minority Populations and Low-Income Populations requires agencies to 1) explicitly consider human health and environmental effects related to transit projects that may have a disproportionately high and adverse effect on minority and low-income populations; and 2) implement procedures to provide “meaningful opportunities for public involvement” by members of these populations during project planning and development.

As part of the project planning process and continuing through completion of the Final EIS, FTA and Sound Transit performed meaningful and extensive outreach efforts to minority and low-income communities to ensure their active participation. Appendix C, Environmental Justice Analysis, of the Final EIS describes these outreach efforts.

Based on the findings of impacts described in the Final EIS, and taking into account the mitigation and enhancement measures that will be implemented and all offsetting benefits to the affected minority and low-income populations, FTA finds that project impacts will not be high and adverse..

Accordingly, FTA finds that the project will not have a disproportionately high and adverse effect on minority or low-income populations. FTA also finds that appropriate outreach has been conducted such that meaningful opportunities for public involvement for those populations have been achieved. Therefore, FTA finds that with the mitigation measures identified in Appendix B of this ROD, the project meets the requirements of Executive Order 12898 and DOT Order 5610.(a).



## 6.12 Section 106 of the National Historic Preservation Act

The National Historic Preservation Act (NHPA) (54 USC § 10010) establishes government policy and procedures regarding “historic properties,” which include districts, sites, buildings, structures, and objects that are listed in or eligible for listing on the National Register of Historic Places (NRHP). Section 106 of the NHPA requires federal agencies to consider the effects of their actions on historic properties.

FTA has consulted with the State Historic Preservation Officer (SHPO) and others and has identified four historic resources in the area of potential effects that are eligible for listing on the NRHP. The project will not affect any of them.

Sound Transit reviewed published literature, historical records, and historic-period maps to gather information on specific locations and land uses during the ethnographic period reflecting Native American use of the area. The agency also conducted pedestrian surveys and subsurface probes. It did not identify significant archaeological resources in the project area. However, the corridor overall has a moderate-to-low probability for containing intact archaeological resources, and construction activities involving excavation could encounter an unanticipated archaeological site. Therefore, Sound Transit will develop and implement an Inadvertent Discovery Plan (IDP) to minimize the risk of damage to currently unknown archaeological resources.

Based on the cultural resources analysis, including consultation and coordination with the State Historic Preservation Office and tribes, and on the implementation of the IDP, FTA finds that the project is unlikely to have an adverse effect on resources eligible for listing on the NRHP, and has satisfied the requirements of the NHPA.

## 6.13 Section 4(f) of the U.S. Department of Transportation Act

Section 4(f) of the U.S. Department of Transportation Act (49 USC § 303) requires that the use of land from important public parks, recreation areas, wildlife refuges, or land containing historical sites of local, state, or federal significance be approved and constructed only if (a) there is no feasible and prudent alternative, and (b) the project includes all possible planning to minimize harm to these resources. If resources protected by Section 4(f) are involved in a project’s planning, a determination is required to confirm if there is a “use” of those resources.

Section 4.18 and Appendix D of the Final EIS document the factors FTA considered and the analysis and consultation performed to support FTA’s determinations that:

- Impacts to Ridgcrest Park in Shoreline are *de minimis*.
- Impacts to Shoreline Stadium in Shoreline are *de minimis*.
- Impacts to the Interurban Trail and Scriber Creek Trail in Lynnwood meet the requirements for temporary occupancy.

Mitigation commitments associated with these *de minimis* and temporary occupancy findings are listed in Appendix B, Mitigation Plan. Accordingly, FTA finds that the project meets the requirements of Section 4(f).

## **6.14 Land and Water Conservation Fund Act of 1965, Section 6(f)**

Section 6(f) of the Land and Water Conservation Fund Act (LWCF Act) prohibits the conversion of property acquired or developed with LWCFs to a non-recreational purpose without the approval of the U.S. Department of Interior's National Park Service (NPS). The Washington State Recreation and Conservation Office (RCO) administers Section 6(f) of the LWCF Act.

There are two properties in the project study area developed with LWCF funds: Twin Ponds Park in Shoreline and Jack Long Park in Mountlake Terrace. Based on the analysis in the EIS and consultations with NPS and RCO, FTA and Sound Transit have concluded there will be no direct or indirect conversion of any part of these parks. Accordingly, FTA finds that the project meets the requirements of Section 6(f).

## **6.15 Americans with Disabilities Act and Architectural Barriers Act**

The Americans with Disabilities Act (ADA) (42 USC § 126 and 47 USC § 5) addresses issues relating to accessibility to places of public accommodation; the Architectural Barriers Act (ABA) (42 USC § 4151) further specifies accessibility standards. The project facilities will be designed to meet all ADA and ABA requirements. Accordingly, FTA finds that the project will meet the standards and requirements of the ADA and ABA.

## **6.16 Executive Order 11988 Floodplain Management**

Executive Order 11988, updated by Executive Order 5650.2, requires federal agencies to avoid to the extent possible the long-term and short-term adverse impacts caused by using and modifying floodplains, and to avoid floodplain development wherever there is a practicable alternative. This order directs each agency to preserve the natural and beneficial values served by floodplains in carrying out its responsibilities with respect to approvals and project funding.

The project will use elevated guideways to cross water bodies, and columns will be located outside the stream channel floodway or floodplain when it is possible to span these areas. In Segment C, the Scriber Creek floodplain is so wide that the project will likely need to place elevated guideway columns within the floodplain boundaries. The project will create additional flood storage to fully compensate for storage removed.

FTA finds that with the mitigation measures identified in Appendix B of this ROD, the project meets the requirements of Executive Order 11988.

## **6.17 Noise Control Act**

The Noise Control Act (as amended by the Quiet Communities Act) (42 USC 65 §§ 4901-4918) requires federal agencies to develop programs to promote an environment free of noise that jeopardizes public health and welfare. This act requires that the agencies comply with state and local noise ordinances. FTA consequently developed criteria, most recently documented in the *Transit Noise and Vibration Impact Assessment Manual* (May 2006), for measuring, assessing, and mitigating noise impacts from transit and transit/highway projects. The Final EIS identified impacts consistent with these

methods; mitigation measures to address impacts are documented in Appendix B of this ROD.

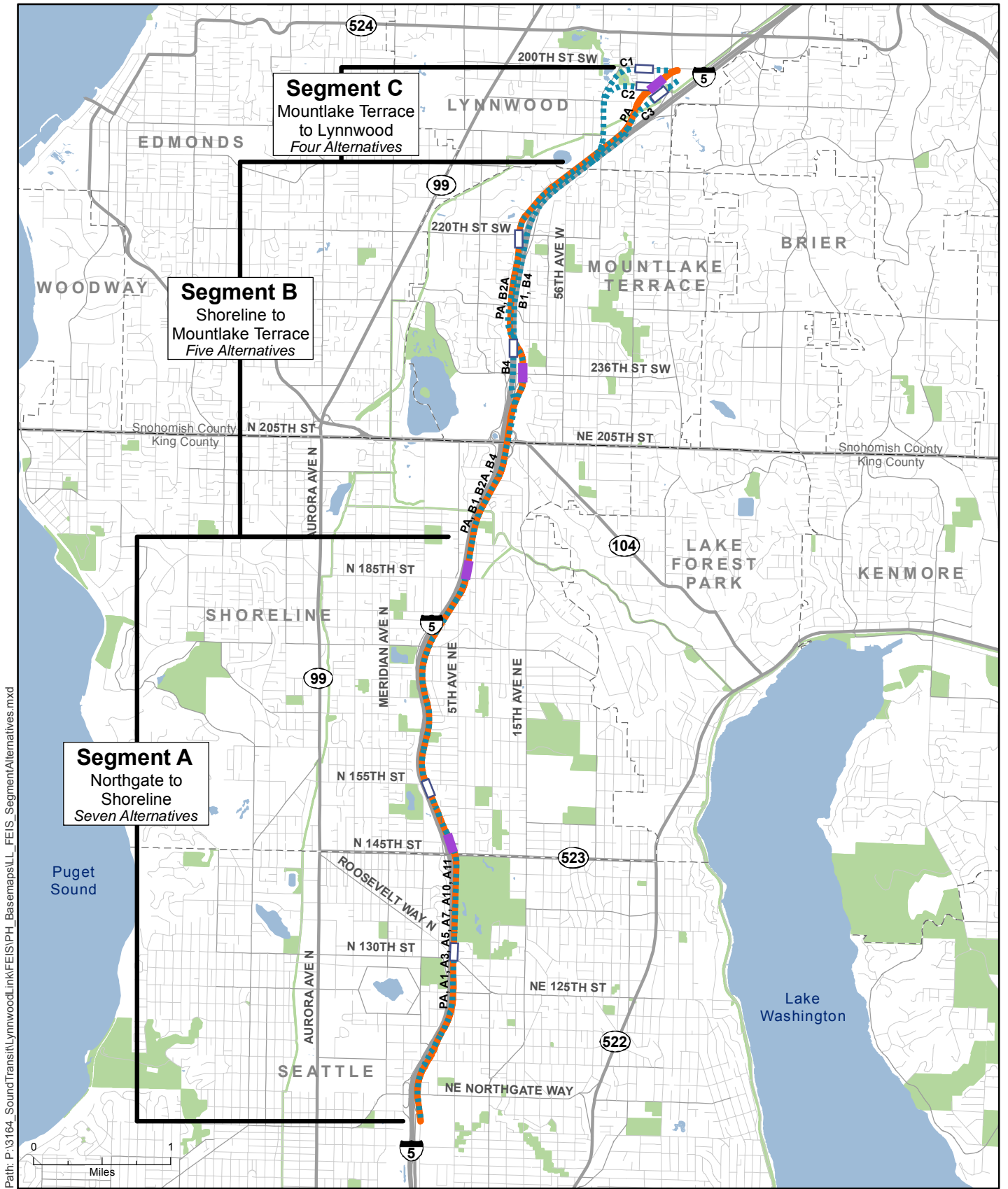
FTA finds that with the mitigation measures identified in Appendix B, the project will comply with the Noise Control Act and Quiet Communities Act.

**R.F. Krochalis**  
Regional Administrator, Region 10  
Federal Transit Administration

Date of Approval

**APPENDIX A**  
**ALTERNATIVES CONSIDERED IN THE FINAL EIS**





Path: P:\3164\_SoundTransit\LynnwoodLink\FEIS\IPH\_Basemaps\LL\_FEIS\_SegmentAlternatives.mxd

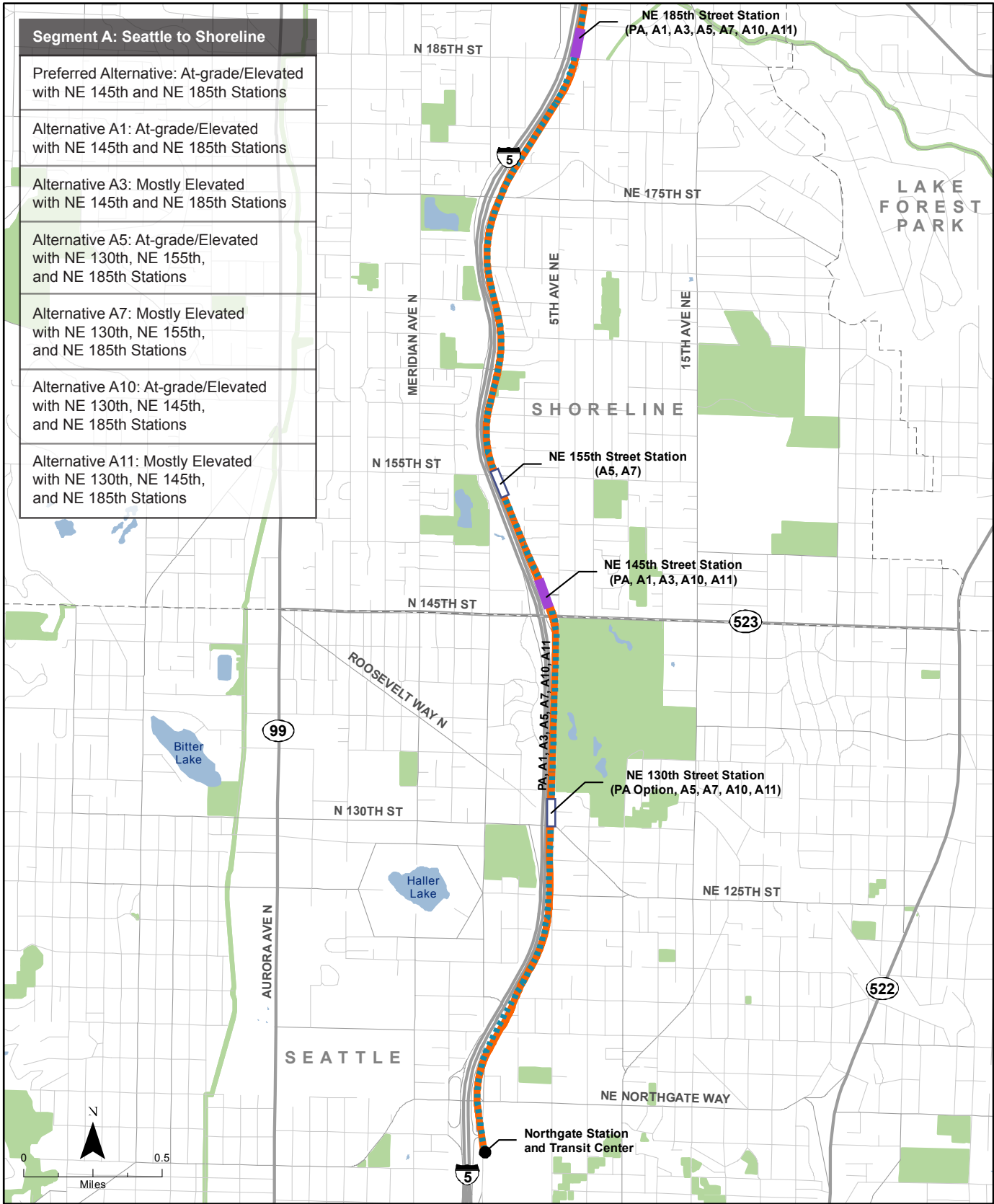
Data Sources: (King County, Snohomish County, WSDOT, Sound Transit)

- Preferred Alternative (PA)
- Preferred Alternative Station Location
- Other Light Rail Alternatives
- Other Alternative Station Location
- Preferred Alternative and Other Alternatives
- Roadway
- Local Street
- City Boundary
- County Boundary
- Park
- Waterbody

Note:  
Each segment alternative can be matched to any adjacent segment alternative.

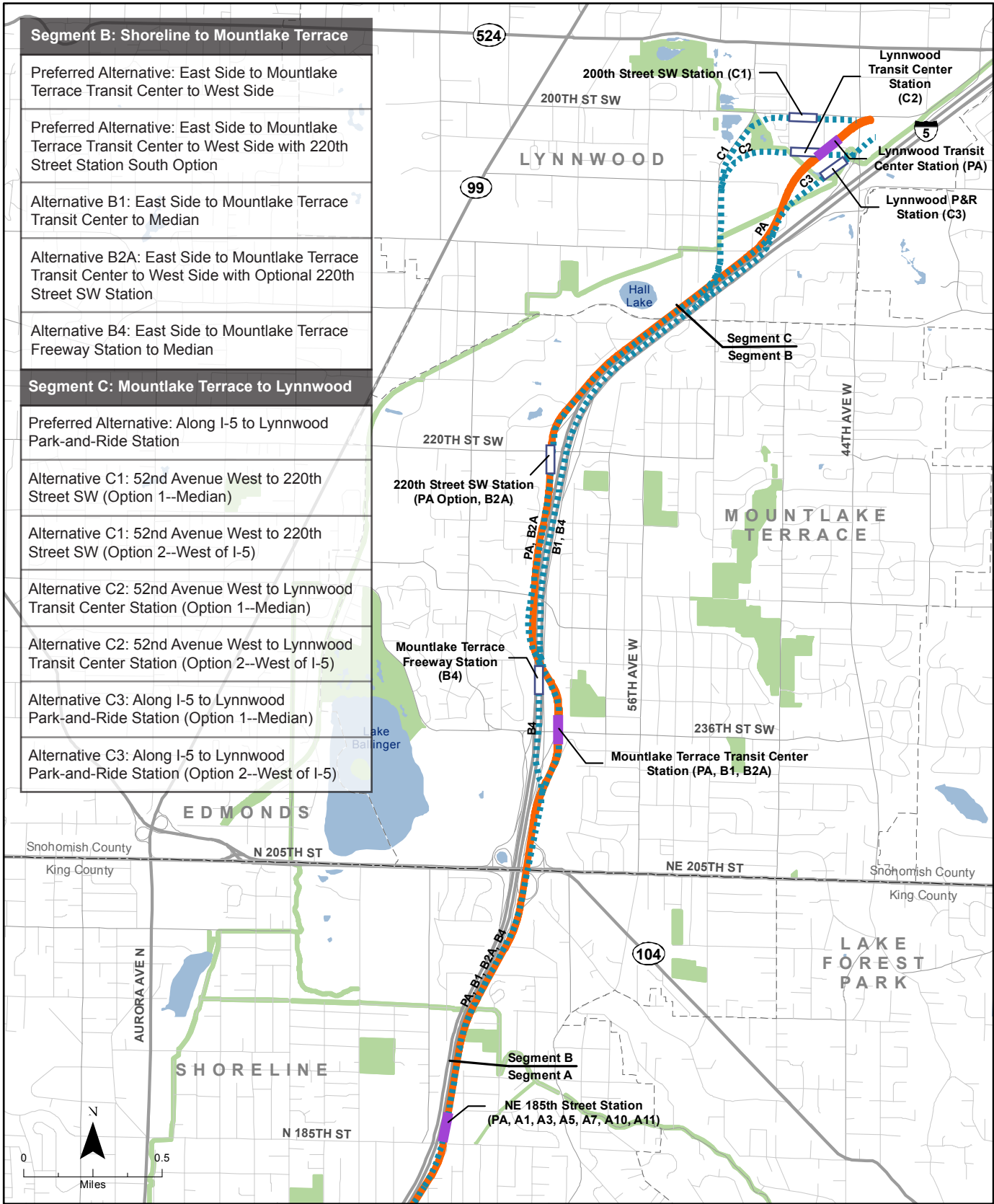
**Figure A-1**  
Alternatives Considered by Segment

Lynnwood Link Extension



- Preferred Alternative (PA)
- Preferred Alternative Station Location
- ⋯ Other Light Rail Alternatives
- Other Alternative Station Location
- Preferred Alternative and Other Alternatives
- Park
- Trail
- Waterbody

**Figure A-2  
Alternatives Considered  
Segment A**



Segment B: Shoreline to Mountlake Terrace	
Preferred Alternative: East Side to Mountlake Terrace Transit Center to West Side	
Preferred Alternative: East Side to Mountlake Terrace Transit Center to West Side with 220th Street Station South Option	
Alternative B1: East Side to Mountlake Terrace Transit Center to Median	
Alternative B2A: East Side to Mountlake Terrace Transit Center to West Side with Optional 220th Street SW Station	
Alternative B4: East Side to Mountlake Terrace Freeway Station to Median	
Segment C: Mountlake Terrace to Lynnwood	
Preferred Alternative: Along I-5 to Lynnwood Park-and-Ride Station	
Alternative C1: 52nd Avenue West to 220th Street SW (Option 1--Median)	
Alternative C1: 52nd Avenue West to 220th Street SW (Option 2--West of I-5)	
Alternative C2: 52nd Avenue West to Lynnwood Transit Center Station (Option 1--Median)	
Alternative C2: 52nd Avenue West to Lynnwood Transit Center Station (Option 2--West of I-5)	
Alternative C3: Along I-5 to Lynnwood Park-and-Ride Station (Option 1--Median)	
Alternative C3: Along I-5 to Lynnwood Park-and-Ride Station (Option 2--West of I-5)	

- Preferred Alternative (PA)
- Preferred Alternative Station Location
- Other Light Rail Alternatives
- Other Alternative Station Location
- Preferred Alternative and Other Alternatives
- Park
- Trail
- Waterbody

**Figure A-3**  
**Alternatives Considered**  
**Segments B and C**





**APPENDIX B**  
**MITIGATION PLAN**



## **APPENDIX B – MITIGATION PLAN**

The mitigation plan for the Lynnwood Link Extension describes Sound Transit’s mitigation commitments that will be implemented to avoid or minimize impacts for the project. Many of the project impacts identified through the EIS process have been mitigated through incorporation of avoidance, minimization or improvement elements that are now included in the definition and design of the project.

The mitigation measures described are based on the mitigation measures identified in the Final EIS. Measures associated with the operation of Lynnwood Link (long-term impacts) are described first; measures associated with construction are described second.

The mitigation measures described in this appendix are conditions of the Lynnwood Link Extension ROD. FTA considers them to be material conditions of this ROD and will incorporate them in any future grant agreement that FTA may award Sound Transit for the construction of the Lynnwood Link Extension. Sound Transit will track these measures and report regularly to FTA to ensure that the mitigation commitments are being met and addressed. In some cases, Sound Transit will incorporate mitigation requirements into its contracting documents for final design and construction.

The Federal Transit Administration finds that with the accomplishment of these mitigation commitments, Sound Transit will have taken all reasonable, prudent and feasible means to avoid or minimize impacts from the project.

**Table B-1. Mitigation Plan**

EIS Chapter/Section	Resource	Impact Topic	Period	Mitigation Description
3	Transportation	General Impacts	Long-term & Construction	For any transportation impact mitigation measures listed below that require the agreement of other agencies and jurisdictions, Sound Transit will coordinate with these parties to finalize and implement improvements to mitigate the Lynnwood Link Extension's impacts.
3	Transportation	Arterials and Local Streets	Long-term	<p>The following intersection improvements will improve the AM and PM peak hour intersection delay to meet LOS standards, or to achieve the same level of service or better for intersections that will be below standards with the No Build Alternative. Sound Transit will provide these improvements or other improvements as agreed to by the local jurisdictions. In lieu of constructing the proposed improvements, Sound Transit could instead contribute to a local jurisdiction's project to improve intersection performance, as agreed to with local jurisdictions.</p> <ul style="list-style-type: none"> <li>• Segment A: North 185th Street and Meridian Avenue North (City of Shoreline): Add protected-permissive phasing to the northbound and southbound left turns.</li> <li>• Segment A: NE 185th Street and 2nd Avenue NE (City of Shoreline): Add a two-way left-turn lane or refuge area on NE 185th Street.</li> <li>• Segment C: 200th Street SW and 50th Avenue West (City of Lynnwood): Add overlap phase to northbound right-turn movement.</li> <li>• Segment C: 200th Street SW and 48th Avenue West (City of Lynnwood): Add eastbound and southbound right-turn pockets.</li> <li>• Segment C: 52nd Avenue West and 204th Street SW (City of Lynnwood): Change traffic control from two-way stop control to signal or roundabout.</li> <li>• Segment C: 200th Street SW and 44th Avenue West (City of Lynnwood): Add a second northbound left-turn lane and extend the eastbound right-turn pocket back to the park-and-ride driveway.</li> </ul>
3	Transportation	Property Access and Local Circulation	Long-term	In areas where the project will modify property access or local circulation, Sound Transit will work with local jurisdictions to develop plans to maintain safe and effective access and circulation. Consistent with its access policies, it will give particular attention to providing safe pedestrian and bicycle access to stations, including the 145th Station/parking garage. In addition, Sound Transit will obtain WSDOT and FHWA approvals, as needed, for improvements to local street access, circulation or intersection modifications related to the modified interchange ramps at NE 145th Street.
3	Transportation	Property Access and Local	Long-term	To discourage cut-through traffic that may occur on residential streets in station areas, Sound Transit will work with local jurisdictions to identify areas where cut-through traffic is occurring and, subject to local agency agreement, implement mitigation such as

Table B-1. Mitigation Plan

EIS Chapter/ Section	Resource	Impact Topic	Period	Mitigation Description
		Circulation		neighborhood traffic controls.
3	Transportation	Parking	Long-term & Construction	Where the project will remove off-street private parking spaces, Sound Transit will provide compensation or equivalent replacement parking.
3	Transportation	Parking	Long-term	Sound Transit will work with local jurisdictions to evaluate and, if necessary, implement hide-and-ride mitigation for all stations. 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 would be needed in coordination with the local jurisdictions. 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 local jurisdiction will be responsible for monitoring, enforcing, and maintaining the parking controls.
3	Transportation	Safety	Long-term	To address potential safety concerns related to the placement of project structures in the I-5 right-of-way, Sound Transit will coordinate with FHWA and WSDOT during final design and to secure highway-related design approvals.
3	Transportation	Transit	Construction	Sound Transit will mitigate the temporary loss of parking at park-and-ride lots through one or more of the following, determined in consultation with local jurisdictions, facility owners, and involved transit agencies: <ul style="list-style-type: none"> <li>• Implement service increases or other measures to encourage transit trips that do not require automobile access.</li> <li>• Redirect transit riders that use these locations to other nearby park-and-ride lots.</li> <li>• Develop temporary parking for transit riders to use during construction.</li> <li>• Build new park-and-ride spaces before removing existing spaces.</li> <li>• Lease parking lots and/or new parking areas near the closed park-and-ride lots.</li> </ul>
3	Transportation	Transit	Construction	Sound Transit will mitigate for partial closures of the Mountlake Terrace Transit Center and Lynnwood Transit Center by implementing one or more of the following, as appropriate, or other measures developed in coordination with transit agencies and local jurisdictions: <ul style="list-style-type: none"> <li>• Relocate transit stops to adjacent streets.</li> <li>• Provide a temporary transit center at a nearby off-street location.</li> <li>• Revise transit services (including temporary service between Mountlake Terrace and destinations in King County due to temporary closure of the Mountlake Terrace freeway station).</li> </ul>

**Table B-1. Mitigation Plan**

EIS Chapter/ Section	Resource	Impact Topic	Period	Mitigation Description
3	Transportation	Transit	Construction	Sound Transit will coordinate with local jurisdictions, King County Metro, Community Transit, and private transit service providers to minimize construction impacts and disruptions to bus facilities and services. Sound Transit will coordinate with those providers to inform passengers about changes with measures such as signage at existing transit stops, and using website information, rider information systems, emails, and agency mailing lists. To mitigate for partial or full street closures, Sound Transit will coordinate with transit providers to reroute buses, where appropriate.
3	Transportation	Freeway Operations	Construction	As part of the WSDOT and FHWA approval process for construction within I-5 right-of-way and to minimize safety and operational impacts during construction, Sound Transit will obtain WSDOT and FHWA approval of the project's Maintenance of Traffic plan for I-5.
3	Transportation	Freeway Operations	Construction	Sound Transit will coordinate construction with incident management, construction staging, and traffic control in places where the light rail construction will affect freeway traffic or involve changes to the roadside environment. Sound Transit will also coordinate with WSDOT to disseminate construction closure information to the public as needed.
3	Transportation	Arterials and Local Streets	Construction	<p>Sound Transit will develop and implement construction mitigation plans in coordination with local jurisdictions during the final design and permitting. Where conditions on arterials may affect freeway operations, Sound Transit will also coordinate with WSDOT. To mitigate impacts to arterials and local streets, Sound Transit will:</p> <ul style="list-style-type: none"> <li>• Develop the Maintenance of Traffic plan to conform to the <i>Manual on Uniform Traffic Control Devices</i> and jurisdictional agency requirements for traffic control.</li> <li>• Use lighted or reflective signage to direct drivers to truck haul routes to ensure visibility during nighttime work hours.</li> <li>• Use temporary reflective truck prohibition signs on streets with a high likelihood of cut-through truck traffic.</li> <li>• Communicate public information about construction activities through tools such as print, radio, posted signs, Web sites, email and direct communication with other agencies and affected parties; ongoing communications will update interested parties regarding street or freeway lane closures, detours, hours of construction, business access, and parking impacts.</li> <li>• Coordinate access closures with affected businesses and residents. If access closures are required, property access to residences and businesses will be maintained to the extent possible. If access to the property cannot be maintained, the specific construction activity will be reviewed to determine if it could occur during non-business hours, or if the parking spaces and users of this access (for</li> </ul>

Table B-1. Mitigation Plan

EIS Chapter/Section	Resource	Impact Topic	Period	Mitigation Description
				<p>example, deliveries) could be provided at an alternative location.</p> <ul style="list-style-type: none"> <li>• Provide parking areas for construction workers, where necessary. This may include remote parking with shuttle service to and from the construction site if sufficient on-site parking cannot be provided.</li> <li>• Post signs prior to construction in areas where surface construction activities will affect access to surrounding businesses.</li> <li>• Schedule traffic lane closures and high volumes of construction truck traffic during off-peak hours.</li> <li>• Evaluate and limit concurrent construction to minimize construction impacts.</li> <li>• Cover potholes and open trenches, where possible, and use protective barriers to protect drivers from trenches remaining open.</li> <li>• Provide temporary parking to mitigate loss due to construction staging or work activities, as appropriate.</li> </ul>
3	Transportation	Nonmotorized Facilities	Construction	Sound Transit will provide detour routes through construction areas and will notify the public of them.
3	Transportation	Nonmotorized Facilities	Construction	Sound Transit will minimize closures of multi-use trails affected by construction. Detours will be provided when trails are closed, unless they are closed for short durations or in areas where a detour option is not feasible.
3	Transportation	Nonmotorized Facilities	Construction	Closures or restrictions of I-5 overcrossings will be sequenced to maintain travel across I-5 at the next nearest crossing.
3	Transportation	Freight Mobility and Access	Construction	Sound Transit will work with local jurisdictions to develop and implement construction traffic control plans. The agency also will coordinate with affected businesses before and during the construction period to maintain business access as much as possible.
3	Transportation	Freight Mobility and Access	Construction	For construction associated with I-5, Sound Transit will coordinate with freight stakeholder groups by providing construction information to WSDOT for use in the state's freight notification system. Sound Transit will provide information in a format acceptable to WSDOT.
3	Transportation	Cumulative	Construction	Sound Transit will coordinate the construction activities of the Northgate Link Extension and Lynnwood Link Extension projects, and will also coordinate with the King County Metro TOD project to minimize impacts of overlapping construction periods.
4.1	Acquisitions, Displacements, and Relocations	Acquisitions, Displacements, and Relocations	Long-term	Sound Transit will pay just compensation to owners whose property it acquires, as specified in Sound Transit's Real Estate Property Acquisition and Relocation Policy, Procedures, and Guidelines; the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended; and the State of Washington's



**Table B-1. Mitigation Plan**

<b>EIS Chapter/ Section</b>	<b>Resource</b>	<b>Impact Topic</b>	<b>Period</b>	<b>Mitigation Description</b>
				relocation and property acquisition law and regulations.
4.1	Acquisitions, Displacements, and Relocations	Acquisitions, Displacements, and Relocations	Construction	Sound Transit will pay just compensation for temporary construction easements and restore the property to its previous condition, unless Sound Transit and the owner agree to other compensation.
4.1	Acquisitions, Displacements, and Relocations	Acquisitions, Displacements, and Relocations	Construction	Sound Transit will mitigate for conversions of federally designated highway beautification areas by providing replacement property along I-5, or by implementing other measures as agreed by WSDOT and FHWA.
4.2	Land Use	Land Use	Long-term & construction	No mitigation is required.
4.3	Economics	Economics	Construction	<p data-bbox="909 670 1839 784">Sound Transit will dedicate staff to work specifically with affected businesses during construction to minimize project-associated impacts. It will develop construction mitigation plans to address the needs of businesses which will include the following measures:</p> <ul data-bbox="909 792 1839 1149" style="list-style-type: none"> <li data-bbox="909 792 1839 820">• Provide a 24-hour construction telephone hotline.</li> <li data-bbox="909 824 1839 852">• Provide business cleaning services on a case-by-case basis.</li> <li data-bbox="909 857 1839 885">• Provide signage such as ‘detour,’ ‘open for business,’ and others as appropriate.</li> <li data-bbox="909 889 1839 946">• Communicate with the public through measures such as meetings and construction updates, alerts, and schedules.</li> <li data-bbox="909 951 1839 1008">• Implement promotions and marketing to help affected business districts maintain their customer base during construction, consistent with Sound Transit policies.</li> <li data-bbox="909 1013 1839 1070">• Maintain access as much as possible to each business and coordinate with businesses in advance of and during periods of limited access.</li> <li data-bbox="909 1075 1839 1102">• Minimize utility disruptions, and provide advance notice of scheduled disruptions.</li> <li data-bbox="909 1107 1839 1135">• Provide a community ombudsman.</li> </ul>
4.3	Economics	Economics	Construction	To avoid cumulative construction impacts, Sound Transit will coordinate construction planning with other project owners and potentially affected parties in construction areas with multiple projects at similar times.
4.4	Social Impacts, Community Facilities, and Neighborhoods	Social Impacts, Community Facilities, and Neighborhoods	Long term & construction	No mitigation is required.
4.5	Visual and Aesthetic	Visual and Aesthetic	Long-term	For areas with high visual impacts, Sound Transit’s will:

Table B-1. Mitigation Plan

EIS Chapter/ Section	Resource	Impact Topic	Period	Mitigation Description
	Resources	Resources		<ul style="list-style-type: none"> <li>• Comply with tree replacement and landscaping policies of WSDOT and local jurisdictions</li> <li>• Develop a Roadside Master Plan, in accordance with WSDOT guidelines, for the portion of the route within the I-5 right-of-way,</li> <li>• Replace converted federally designated highway beautification areas with replacement property along I-5, or with other measures as agreed by WSDOT and FHWA. Replacement parcels will meet the intended function of the original beautification area.</li> <li>• Apply landscaping or visual treatments to retaining walls and other structures, consistent with available land, safety, and maintenance and operation needs.</li> </ul>
4.5	Visual and Aesthetic Resources	Visual and Aesthetic Resources	Construction	Sound Transit will shield light sources used in nighttime construction to reduce lighting impacts. Sound Transit will design and place construction screens or barriers to limit the visibility of work areas that will intrude on adjacent activities such as public open space, community facilities, and recreational areas and trails, where practical.
4.6	Air Quality and Greenhouse Gases	Air Quality and Greenhouse Gases	Long-Term	No mitigation is required.
4.6	Air Quality and Greenhouse Gases	Air Quality and Greenhouse Gases	Construction	<p>Consistent with Puget Sound Clean Air Agency requirements, Sound Transit will use best management practices (BMPs) to prevent and reduce air quality impacts resulting from construction activities. Construction activities will comply with local regulations governing air quality, including those for controlling fugitive dust. Sound Transit will:</p> <ul style="list-style-type: none"> <li>• Spray exposed soil with water to control dust.</li> <li>• Cover all transported loads of soils and wet materials before transport, or provide adequate freeboard (i.e., space from the top of the material to the top of the truck).</li> <li>• Install wheel washes or manually wash truck wheels, where needed.</li> <li>• Frequently remove the dust and mud that are deposited on paved, public roads.</li> <li>• Route and schedule high volumes of construction traffic to reduce impacts, where practicable.</li> <li>• Require appropriate emission-control devices on all construction equipment powered by gasoline or diesel fuel.</li> <li>• Use well-maintained heavy equipment.</li> <li>• Cover, apply mulch, or plant vegetation as soon as practicable after grading.</li> <li>• Encourage contractors to employ emission-reduction technologies and practices</li> </ul>

**Table B-1. Mitigation Plan**

EIS Chapter/ Section	Resource	Impact Topic	Period	Mitigation Description
				<p>for both on-road and off-road equipment and vehicles (e.g., retrofit equipment with diesel control technology and/or use ultra-low sulfur diesel).</p> <ul style="list-style-type: none"> <li>• Implement idling restrictions for construction trucks.</li> <li>• Locate construction equipment and truck staging zones away from sensitive receptors, as practicable, and in consideration of other factors such as noise and safety.</li> </ul>
4.7	Noise and Vibration	Noise	Long-Term	<p>Sound Transit will prevent and mitigate noise impacts consistent with its Light Rail Noise Mitigation Policy (Motion No. M2004-08). During final design, Sound Transit will review all predicted impacts and mitigation measures for verification. If it finds that equivalent mitigation can be achieved by a method less costly than what had been planned, or if the detailed analysis shows no impact, then the mitigation measure may be modified or eliminated.</p> <p>To avoid noise <u>impacts from light rail operations</u>, Sound Transit will either (a) incorporate in the guideway a noise barrier 4 to 8 feet high on the edge of the structure closest to the noise-sensitive uses; or (b) install at-grade noise walls from 4 to 10 feet above the track height, or from the top of retaining walls built as part of the project.</p> <p>Sound Transit will mitigate <u>impacts from buses and cars operating</u> in park-and-ride lots (at NE 185th Street and the Mountlake Terrace Station) by building noise barriers along the edge of the facility, applying sound insulation, or revising the design of the facility to move access driveways and bus loading areas farther from residences.</p> <p>To avoid <u>impacts from the replacement of existing noise walls</u>, Sound Transit will build replacement noise walls 6 to 24 feet high.</p> <p>To avoid <u>impacts caused by wheel squeal</u>, Sound Transit will regularly lubricate all curves with radii less than 600 feet near noise-sensitive uses. It may use a wayside or vehicle-mounted lubrication system. It will design all curves with radii between 600 and 1250 feet near noise-sensitive uses to accommodate a wayside track lubrication system that it will install should wheel squeal occur during operation.</p> <p>If the above techniques are infeasible or will not be entirely effective at reducing noise levels below the FTA impact criteria or applicable requirement, Sound Transit will evaluate and offer sound insulation to residential properties where the existing building does not already achieve a sufficient exterior-to-interior reduction of noise levels.</p> <p>While the mitigation described above is based on predicted impacts, Sound Transit will provide further noise mitigation if operations cause noise impacts for which mitigation is necessary and appropriate under FTA noise impact criteria.</p>
4.7	Noise and	Vibration	Long-Term	Sound Transit will use design measures to avoid vibration impacts based on FTA

Table B-1. Mitigation Plan

EIS Chapter/ Section	Resource	Impact Topic	Period	Mitigation Description
	Vibration			criteria. Measures may include a tire-derived aggregate (shredded tires) in a layer below the track ballast; ballast mats; a resiliently supported track; high-compliance rail fasteners; or column isolation. Specific designs to mitigate impacts to below the FTA criteria will be determined during final design.
	Noise and Vibration	Noise and Vibration	Long-Term	Special trackwork with low-impact frogs will be used in place of a conventional frog where cross-overs (the point at which two rails cross) will cause a noise or vibration impact that cannot be mitigated through other measures.
4.7	Noise and Vibration	Noise	Construction	Where existing noise walls will require relocation, Sound Transit will relocate them as early in the construction process as practical so that the relocated walls will reduce noise from the ongoing construction activities. Sound Transit will seek appropriate noise variances from the local jurisdiction.
4.7	Noise and Vibration	Noise and Vibration	Construction	<p>Construction noise and vibration control mitigation will meet required noise limits and minimize vibration by using the following measures as necessary:</p> <ul style="list-style-type: none"> <li>• Install construction site noise barrier or noise wall by noise-sensitive receivers where feasible.</li> <li>• 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.</li> <li>• Use low-noise emission equipment.</li> <li>• Implement noise-deadening measures for truck loading and operations.</li> <li>• Monitor and maintain equipment to meet noise limits.</li> <li>• Use lined or covered storage bins, conveyors, and chutes with sound-deadening material.</li> <li>• Use acoustic enclosures, shields, or shrouds for equipment and facilities.</li> <li>• Install high-grade engine exhaust silencers and engine-casing sound insulation.</li> <li>• Prohibit aboveground jack hammering and impact pile driving during nighttime hours.</li> <li>• Minimize the use of generators or use whisper-quiet generators to power equipment.</li> <li>• Limit use of public address systems.</li> <li>• Use movable noise barriers at the source of the construction activity.</li> <li>• Limit or avoid certain noisy or high vibration activities during nighttime hours.</li> </ul>

**Table B-1. Mitigation Plan**

EIS Chapter/ Section	Resource	Impact Topic	Period	Mitigation Description
				<ul style="list-style-type: none"> <li>• Demolish existing structures near vibration-sensitive receivers with methods that do not cause impact forces against the buildings or near them.</li> <li>• Minimize use of vibratory soil compactors and vibratory hammers near vibration-sensitive receivers.</li> <li>• Use oscillatory pile-casing techniques where appropriate.</li> <li>• Avoid using variable-frequency vibratory hammers in dense residential areas, such as around the NE 130th Street, NE 145th Street, NE 155th Street, and NE 185th Street Stations.</li> <li>• Use resonance-free vibratory hammers or variable eccentric moment vibrators or other appropriate substitute for conventional vibratory hammers or pile drivers.</li> </ul>
4.8	Ecosystem Resources	Environmentally sensitive resources	Construction	Sound Transit will implement BMPs to protect all sensitive areas. It will use fencing and signage to mark and protect riparian vegetation, wetlands, woodlands, and other sensitive sites outside of the designated construction limits.
4.8	Ecosystem Resources	Aquatic habitat	Construction	Sound Transit will use temporary work trestles or apply other footprint minimization techniques in the Scriber Creek wetland complex.
4.8	Ecosystem Resources	Aquatic habitat	Construction	Sound Transit will use BMPs to protect fish and aquatic habitat. All work below the ordinary high water mark will comply with the terms and conditions set forth in the HPA issued by WDFW for the project.
4.8	Ecosystem Resources	Vegetation and wildlife	Long-term	Sound Transit will coordinate with WSDOT, local jurisdictions, and resource agencies to minimize the potential for light rail facilities to interfere with future restoration projects.
4.8	Ecosystem Resources	Aquatic habitat	Construction	To reduce the risk of adverse effects on migrating salmonids, Sound Transit will require construction contractors to direct lighting away from fish-bearing waters and to place hoods or shields on lights, as needed, to minimize the amount of backlight or dispersed light cast toward the water's surface.
4.8, 4.9	Ecosystem Resources and Water Resources	Surface water	Construction	For water quality protection, Sound Transit will obtain and adhere to a construction stormwater general permit under the National Pollutant Discharge Elimination System (NPDES) permit program to reduce or eliminate stormwater pollution and other impacts on surface waters. It will also develop and implement construction stormwater pollution prevention plan (SWPPP), approved by Ecology, before the start of construction. The plan will include BMPs to (1) prevent erosion, (2) prevent sedimentation, and (3) identify, reduce, eliminate, or prevent stormwater contamination and water pollution from construction activity. The construction stormwater pollution prevention plan will include a temporary erosion and sediment control (TESC plan) that includes BMPs such as silt fences; protective ground covers such as straw, plastic sheeting, or jute

Table B-1. Mitigation Plan

EIS Chapter/ Section	Resource	Impact Topic	Period	Mitigation Description
				mats; and straw bales in drainage features; spill prevention, control, and countermeasures plan; concrete containment and disposal plan; dewatering plan; and a fugitive dust plan.
4.8	Ecosystem Resources	Vegetation and wildlife	Construction	To avoid or minimize effects on vegetation and wildlife resources, Sound Transit will minimize vegetation clearing, restore temporarily affected areas, and prepare and implement a revegetation plan.
4.8	Ecosystem Resources	Vegetation and wildlife	Construction	In accordance with the Migratory Bird Treaty Act, Sound Transit will consult with the U.S. Fish and Wildlife Service on measures to avoid impacts on migratory birds. Measures likely to be required may include pre-construction surveys for migratory birds and/or restrictions on vegetation clearing during the breeding season for migratory birds. Except where hazard trees pose an immediate threat to light rail safety or reliability, vegetation maintenance and hazard tree removal will be conducted outside of the breeding season for migratory birds.
4.8	Ecosystem Resources	Vegetation and wildlife	Construction	Sound Transit will implement appropriate measures to minimize the risk of introduction and spread of noxious and invasive species, including restoring temporarily disturbed areas as soon as practical following construction activities. To minimize use of herbicides and fertilizers, restoration will include mulching, ground cover, and other planting strategies that discourage undesirable species.
4.8	Ecosystem Resources	Environmentally sensitive resources	Long-term	<p>Sound Transit will mitigate long-term impacts on wetlands and wetland buffers through the use of available approved mitigation banks, the King County in-lieu fee program, or project-specific mitigation developed by Sound Transit. Sound Transit will implement compensatory mitigation in accordance with applicable federal, state, and local requirements and guidelines. Sound Transit will mitigation for unavoidable impacts on streams, stream buffers, and wildlife habitat in compliance with local critical areas ordinances. Sound Transit's actions to mitigate for impacts on wetlands and wetland buffers (e.g., planting native trees and shrubs near wetland areas) will help offset the loss of some habitat for wildlife and contribute to improved ecological function of nearby streams and stream buffers. Tree planting required for compliance with WSDOT's and local jurisdictions' tree protection rules will also mitigate for impacts on streams, stream buffers, and wildlife habitat. Potential sites currently under consideration for project-specific mitigation for impacts on wetlands and wetland buffers are:</p> <ul style="list-style-type: none"> <li>• North Seattle Community College Campus</li> <li>• Jackson Park Golf Course/5th Avenue NE</li> <li>• NE 145th Street Vicinity</li> </ul>

**Table B-1. Mitigation Plan**

<b>EIS Chapter/ Section</b>	<b>Resource</b>	<b>Impact Topic</b>	<b>Period</b>	<b>Mitigation Description</b>
				<ul style="list-style-type: none"> <li>• NE 155th Street Station Vicinity</li> <li>• Ballinger Lake Golf Course</li> <li>• Scriber Creek Wetland Complex (Wetland WLY4)</li> </ul>
4.8, 4.9	Ecosystem Resources and Water Resources	Aquatic Resources and Water Resources	Long-term	Sound Transit will comply with all federal, state, and local regulations to prevent or minimize long-term surface water impacts, including low-impact development (LID) approaches, where applicable, stormwater flow control and water quality treatments as identified in Table 4.9-1 in the EIS, and by designing drainage to maintain existing stream basin contributing areas.
4.10	Energy Impacts	Energy Impacts	Long-term & construction	No mitigation is required.
4.11	Geology and Soils	Geology and Soils	Long-term & construction	No mitigation is required.
4.12	Hazardous Materials	Hazardous Materials	Construction	To mitigate impacts from potential contaminated sites in the project area, Sound Transit will perform environmental due diligence for properties along the project corridor before property acquisition. Sound Transit will perform a Phase I Environmental Site Assessment (ESA) on properties to be acquired or that have substantial associated construction activities. It will perform a Phase II ESA for property acquisition or for construction purposes if the Phase I ESA determines that the property has a likelihood of contamination. The results of these assessments will help establish the condition of acquisition properties and/or to determine plans for cleanup and construction management, as needed. Sound Transit will notify Ecology if unknown contamination is encountered during an assessment. If previously contaminated properties require longer-term covenants, restrictions, or other remedial activities, Sound Transit will take appropriate action as approved by Ecology.
4.12	Hazardous Materials	Hazardous Materials	Construction	To address potential impacts on environmental resources from construction activities, Sound Transit will require contractors to prepare hazardous material management plans, construction stormwater pollution prevention plans, health and safety plans, spill control and prevention plans, contaminated media management plans, and lead and asbestos abatement programs, as necessary, and to implement the plans' procedures for managing hazardous materials in accordance with state and federal regulations. To the extent practicable, Sound Transit will limit construction activities that might encounter contaminated groundwater or contaminated soil.
4.13	Electromagnetic Fields	Electromagnetic Fields	Long-term & construction	No mitigation is required.

**Table B-1. Mitigation Plan**

<b>EIS Chapter/Section</b>	<b>Resource</b>	<b>Impact Topic</b>	<b>Period</b>	<b>Mitigation Description</b>
4.14	Public Services	Public Services	Construction	Sound Transit will coordinate with the Shoreline Fire Department during final design to avoid construction impacts to Station No. 65, and to define and implement measures to minimize impacts on response times and operations.
4.14	Public Services	Public Services	Long-term & construction	During final design and construction, Sound Transit will coordinate with the Edmonds School District to minimize property impacts on School District properties in Segments B and C.
4.14	Public Services	Public Services	Construction	Sound Transit will provide regular updates to schools, emergency service providers, local agencies, and postal services, and notices of unanticipated circumstances that could affect service delivery. It will also assist public school officials in providing advance and ongoing notices to students and parents about construction activity near schools.
4.15	Utilities	Utilities	Construction	Sound Transit will avoid or minimize impacts to utilities by adhering to design standards and implementing BMPs such as potholing and preconstruction surveys to identify utility locations. Coordination with utility providers and outreach to the public during construction will minimize service disruptions and associated impacts. Sound Transit will follow safety protocols to protect the public and construction workers.
4.16	Cultural, Archaeological, and Historic Resources	Cultural, Archaeological, and Historic Resources	Construction	<p>To minimize the risk of damage to currently unknown archaeological resources, Sound Transit will develop an Inadvertent Discovery Plan prior to ground-disturbing construction activities. FTA and Sound Transit will coordinate with the State Historic Preservation Office (SHPO) and tribes to review the plan. In addition, archaeologists will conduct training for contractors to help them identify potential archaeological remains during construction; the training will also cover protocols to implement if something is discovered.</p> <p>If potentially significant archaeological materials or sites (or evidence thereof) are discovered during construction, Sound Transit will halt activities around the find and take all reasonable measures to avoid or minimize harm to the property until FTA and Sound Transit, in consultation with the SHPO and interested tribes, determine that the project is in compliance with Section 106 of the National Historic Preservation Act.</p> <p>The Inadvertent Discovery Plan will also describe the procedures that Sound Transit and FTA will follow if any human remains are discovered during project construction.</p>
4.17	Parks and Recreational Resources	Parks and Recreational Resources	Long-term	Ridgecrest Park: In coordination with the City of Shoreline, Sound Transit will restore the affected area and place a barrier between the light rail facility and the park to function like the existing berm in buffering I-5 noise and views of I-5. It will also design



**Table B-1. Mitigation Plan**

<b>EIS Chapter/ Section</b>	<b>Resource</b>	<b>Impact Topic</b>	<b>Period</b>	<b>Mitigation Description</b>
				and rebuild 1st Avenue NE from NE 159th to NE 161st Street, in coordination with the City, and transfer replacement property at the south end of the park, or other property as agreed to with the City, consistent with the requirements of Forward Thrust. The replacement land will be developed to a level comparable to the displaced park area, and the design process will include outreach in the adjacent neighborhood to inform roadway and park design, in coordination with the City.
4.17	Parks and Recreational Resources	Parks and Recreational Resources	Construction	Shoreline Park and Stadium: Sound Transit will restore affected areas after construction, and will coordinate access improvements and construction activities with the Shoreline School District.
4.17	Parks and Recreational Resources	Parks and Recreational Resources	Construction	Trails: For all temporary trail closures or reroutes associated with construction, Sound Transit will minimize closures during construction; when closures are unavoidable, it will coordinate with appropriate local jurisdictions to develop detours and to provide public information and signed detour routes to allow for continued connections.

## **APPENDIX C**

### **RESPONSES TO Comments Received on the Final EIS**



## APPENDIX C – FINAL EIS REVIEW LETTERS AND RESPONSES

In the 30 days following the April 3, 2015 announcement of availability of the Final EIS in the Federal Register, Sound Transit and FTA received five letters with comments. (Federal agencies generally wait 30 days after a Final EIS is released before making a decision on a proposed action, although regulations allow FTA to make decisions concurrent with a Final EIS release.

The following parties submitted written comments:

- City of Shoreline, April 9, 2015 (John Norris, Assistant City Manager) and May 4, 2015 (Shari Winstead, Mayor)
- Andy Walgamott, April 13, 2015
- Seattle’s Light Rail Review Panel, April 17, 2015 (Shannon Loew, Chair)
- Environmental Protection Agency, Region 10, May 4, 2015 (Christine Reichgott, Manager)

The letters are included in this Appendix, and a summary of the comments and the responses of Sound Transit and FTA to the points they raised are below.

### City of Shoreline

The City’s letter of April 9, addressed to the Sound Transit Board Chair, stated its support for the project, and its interests in safe and accessible bicycle and pedestrian facilities for stations on the east side of I-5 at NE 145<sup>th</sup> Street and NE 185<sup>th</sup> Street. The City described advantages to placing a garage on the west side of I-5 at NE 185<sup>th</sup> Street, and stated its willingness to work with Sound Transit, the Shoreline School District and others on design solutions. The City also described its desire to be sure impacts or proposed mitigation defined in the Final EIS are appropriate or adequate.

The City’s letter on May 4, 2015, addressed directly to FTA, asked FTA to include language in the ROD on the importance of safe and accessible pedestrian and bicycle access to the stations, reflecting the wording of the Sound Transit Board resolution adopting the project.

**Response:** *To address the issues raised in the City’s April 9 letter, the specific details of bicycle and pedestrian features at stations will be further defined during final design, and the designs will be developed in coordination with the City. The City’s preference for the NE 185<sup>th</sup> Street station with a west side garage is consistent with Sound Transit’s Resolution R2015-05 and the description of the project in this Record of Decision. No specific areas of technical concern about impacts or mitigation were noted in the letter. In addition to the specific mitigation measures defined in Appendix B, Mitigation Plan, Sound Transit will be required to obtain and comply with all permits needed for the construction of the project.*

*To address the request in the Mayor's letter to FTA on May 4, the Sound Transit Board Resolution R2015-05 included direction for Sound Transit to partner with the cities of Seattle, Shoreline, Mountlake Terrace and Lynnwood during final design to identify and implement appropriate pedestrian, bicycle and vehicular access enhancements to stations. Chapter 2 of the Final EIS notes that stations will include pedestrian and bicycle access to and from feeder bus lines, park-and-ride facilities, and surrounding streets, and would satisfy public access and safety requirements. As indicated in the response to the City's comments on the Draft EIS, Sound Transit has stated it will coordinate with the City during final design to explore opportunities for improving station access, consistent with Sound Transit's system access policies.*

### **Amy and Andy Walgamott**

The Walgamotts emailed comments to FTA stating their opposition to a parking garage at the NE 145<sup>th</sup> Street Station and describing concerns about traffic, public safety and criminal activity. They also opposed the garage because it could remove mature trees.

***Response:** The Final EIS responded to similar public comments that were made on the Draft EIS. The parking garage at NE 145<sup>th</sup> Street is part of a balanced approach to providing multimodal access to the station, and the project includes street and intersection improvements that avoid traffic impacts. Conditions along NE 145<sup>th</sup> Street with the project would operate the same or better than they would under No-Build. The project would not preclude the ability to improve NE 145<sup>th</sup> Street, but it also does not require further improvements. The project includes mitigation measures to address the potential for spillover parking on neighborhood streets. Sound Transit's park and ride facilities feature a combination of electronic surveillance and transit security services, working in coordination with local law enforcement agencies. This is consistent with Final EIS, Section 4.14, Safety and Security, which notes that crime levels near station areas are closely related to crime in the surrounding areas, and then describes the design and operating measures that will be implemented by the project. Finally, while the removal of some large trees may be unavoidable for the guideway, station or parking garage, the Final EIS describes Sound Transit's commitments to minimize tree removal through final design, to replace trees in accordance with City of Shoreline and WSDOT requirements, and to explore other visual impact mitigation measures in areas of high impacts.*

### **U.S. Environmental Protection Agency**

EPA's letter noted the project's efforts to reduce impacts to sensitive resources while working to improve transportation and community benefits, but the agency still had concerns about impacts to the Scriber Creek Wetland Complex. EPA recommended further measures be taken to reduce impacts through project planning and design. The letter also encouraged compensatory wetland mitigation that would improve ecological connectivity in the project area, and discouraged measures using excavation in the wetlands as a way to replace any lost floodplain storage.

**Response:** *After the Draft EIS, the Preferred Alternative, which modified Alternative C3, was developed in accordance with Sound Transit Board direction, and featured a multidisciplinary planning process that was coordinated with the City of Lynnwood and others. The process considered impacts to the wetlands and creek, impacts to adjacent properties and a city park, impacts to a regional trail, traffic impacts, multimodal access and circulation, land use and economic development, and a wide range of structural, light rail design and construction factors. Although Alternative C3 had lower wetland impacts, the alignment would limit future development east of 44<sup>th</sup> Avenue West in an area designated for the highest density development in the Lynnwood regional growth center. The Preferred Alternative avoided these properties as well as improved the project's multimodal access and circulation. Alternative C1, which would have the lowest wetland impact, carried impacts to Scriber Creek Park, a Section 4(f) resource, and it also had higher levels of property acquisitions and displacements and other impacts.*

*Although the Final EIS impact estimates are higher for the Preferred Alternative than for Alternative C3, they are conservative estimates that reflect the overall footprint of the elevated guideway from edge to edge, with no assumptions regarding avoidance or minimization likely available with an elevated guideway or through the design of the specific structures. Depending on the type of structure used for the elevated guideway, and construction approach, Sound Transit expects the impacts to be less than stated in the Final EIS. During final design and permitting, further opportunities to minimize impacts will be evaluated.*

*As described in the Ecosystems Technical Report, Sound Transit has reviewed potential candidate sites available for compensatory mitigation in Segment C, and there are opportunities for the project to provide mitigation that also supports ecological connectivity. Sound Transit also intends to further explore opportunities to mitigate for any loss of floodplain storage without excavating within the wetland.*

## **Seattle Light Rail Review Panel**

The Seattle Light Rail Review Panel letter recommended a station at NE 130<sup>th</sup> Street, and described its advantages. This includes connections to nearby hub urban villages and affordable, higher-density housing; good connections for modes other than the auto; and potential increases in ridership that would outweigh the increase an added station would have on overall travel time.

**Response:** *The Sound Transit Board adopted a project that includes low-cost provisions that would facilitate the development of a potential future station at NE 130<sup>th</sup> Street. The Sound Transit Board would still need to approve funding for the station before it could be developed.*





SHORELINE  
CITY COUNCIL

Shari Winstead  
Mayor

Chris Eggen  
Deputy Mayor

Will Hall

Doris McConnell

Keith A. McGlashan

Chris Roberts

Jesse Salomon

April 9, 2015

The Honorable Fred Butler, Chair  
Sound Transit Capital Committee  
501 S. Jackson St  
Seattle WA 98114

Dear Chair Butler:

The City of Shoreline would like to comment on the Lynnwood Link Final Environmental Impact Statement (FEIS) recently released to express support for inclusion of robust pedestrian and bicycle facilities to access the stations in Shoreline along with a west side of Interstate-5 parking garage at the future 185th station. In addition, we also would like to share our concerns with the FEIS.

First, the City is truly excited for light rail and we have been working with our community to prepare for that decision, including implementing station area mixed use and Transit Oriented Development zoning for the 185th Street Station this past March. As we know there will be thousands of pedestrians accessing each station in the future (2,000 at N. 185th, 2,800 at N. 145th), therefore, having safe and accessible bicycle and pedestrian facilities is critical to ensuring that ridership. Crossing Interstate-5 is a significant barrier for those users without additional facility improvements at or adjacent to both bridges.

In concert with pedestrian and bicycle access, we would like to express support for locating the parking garage for the 185th Street Station on the west side of Interstate 5 as part of the final alignment decision at the April 23, 2015 Board Meeting.

The Shoreline City Council originally identified the west side of I-5 as their preferred station location. Locating the garage on the west side will alleviate vehicle traffic on the bridge and at the station, which will make it easier and safer for pedestrians, bicycles and transit to access the station.

The Council feels that the community and the system would be best served by a garage on the west side of I-5 as it can be utilized during non peak hours with our regional facilities located just to the west, including a conference center, Senior Center, Recreation Center, pool, sports stadium and regional athletic fields. The City understands that there are concerns regarding the west side location, but we are committed to working with Sound Transit, the Shoreline School District, and Sound Transit's federal funding partners to find a solution that works on the west side.

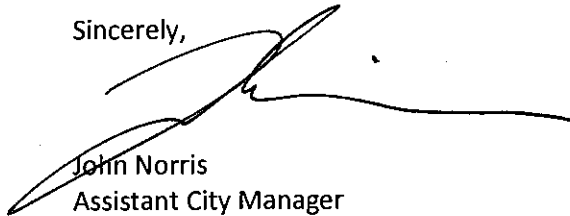


Second, in the City's FEIS due diligence review, staff has identified concerns regarding information in the FEIS that may affect the type and scope of necessary mitigation for the project. While the City has had some opportunity to review and discuss materials earlier in the process, the City was not provided FEIS documents in advance, and we have worked to complete our due diligence within a very short two-week time frame. It is critical to allow the City to determine whether impacts or proposed mitigation set forth in the FEIS is appropriate or adequate.

Staff has notified Sound Transit staff of our concerns and Sound Transit is working to provide these documents. Shoreline staff will be working diligently to review them prior to the FEIS appeal period ending. This is a very tight timeline, constricted by our Council's last opportunity to take action ahead of the appeal deadline on Monday, April 13th. We hope to be able to finish our review within that timeline and to be able advise our Council accordingly.

The City of Shoreline is strong supporter of Sound Transit's Lynnwood Link Project and we will continue to work in partnership to build the best possible project. Should you have further questions regarding the city's comments or concerns, please do not hesitate to contact our Transportation Services Manager, Nytasha Sowers, at [nsowers@shorelinewa.gov](mailto:nsowers@shorelinewa.gov) or (206) 801-2483.

Sincerely,



John Norris  
Assistant City Manager

cc: Shoreline City Council  
Debbie Tarry, City Manager  
Ric Ilgenfritz, Sound Transit Executive Director, PEPD  
Chris Arkills, Transportation Advisor to the King County Executive  
Matt Sheldon, Light Rail Project Development Manager  
Patrice Hardy, Sound Transit Government Relations  
Scott MacColl, Intergovernmental Relations Manager  
Nytasha Sowers, Transportation Services Manager



SHORELINE  
CITY COUNCIL

Shari Winstead  
Mayor

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Deputy Mayor

Will Hall

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Keith A. McGlashan

Chris Roberts

Jesse Salomon

May 4, 2015

Daniel Drais  
Office of Planning and Program Development  
US DOT, Federal Transit Administration  
915 Second Avenue, Suite 3142  
Seattle, WA 98114

RE: The Lynnwood Link Extension light rail transit project FEIS Record of Decision

Dear Mr. Drais:

The City of Shoreline greatly anticipates light rail coming to our community. As you know, the Sound Transit Board recently adopted the resolution selecting the final alignment for Lynnwood Link Extension light rail transit project (LLE Project). The City requested, and the Sound Transit Board (Board) agreed, to add language to the resolution recognizing the importance of safe and effective pedestrian and bicycle access to the stations. The City would like to request that same language be included in the Federal Transit Administration (FTA) Record of Decision for the project.

This project is vitally important to the City, our neighboring jurisdictions to the north and east, and the region. The City is actively involved in planning for light rail, including recently adopting a comprehensive rezone of the area around the 185<sup>th</sup> Street station, and we are halfway through the process for the 145<sup>th</sup> Street Station. One of the main purposes of rezoning is to ensure the success of the LINK system and to create future land uses that are consistent with the regional transportation vision. The City is also in the planning stage to address the 145<sup>th</sup> Street/SR 523 corridor, and has initiated a multimodal corridor study which is scheduled for completion this December. To date, the City has secured a \$4.5 million dollar grant to fund that study, and the City is actively seeking both state and federal funding.

The City is also actively involved in project planning and review, and has taken actions in support of the project alignment and station location. As the planning for Lynnwood Link proceeded and as the DEIS was issued, the City had several concerns. The City worked very closely with Sound Transit staff to address these concerns, which is reflected in specific language in the recent Board action. In particular, the Board action on April 23, 2015, unanimously adopted Resolution R2015-05, selecting the route alignment, station locations and other elements of the LLE Project. This resolution contains specific language (added

through Amendment no. 4, also unanimously approved) to explicitly recognize the importance of providing safe and effective multimodal access to each light rail station:

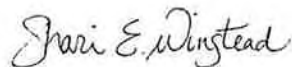
*Sound Transit recognizes the importance of safe and effective pedestrian, bicycle and vehicular access to its facilities. Consistent with Sound Transit's system access policy, Sound Transit will partner with the cities of Seattle, Shoreline, Mountlake Terrace and Lynnwood during project final design to identify and implement appropriate pedestrian, bicycle and vehicular access enhancements to stations focused generally within ¼ mile of the stations.*

The City appreciates this specific language and is fully committed to continue working collaboratively with Sound Transit during project final design to address these concerns. The Board, in discussing the resolution and the amendment above, heard from a number of cities with similar concerns. The FTA Administrator, Rick Krochalis, was in the audience and heard the testimony, as well as the support for the above language from several ST Board members. While testifying on behalf of the City of Shoreline, I was heartened to hear so much support from the Board.

As the City has consistently noted during the planning process with ST staff, the selected station locations do not have optimal access, primarily due to historical development patterns. More specifically, Shoreline neighborhoods in the vicinity of the planned 145<sup>th</sup> and 185<sup>th</sup> light rail stations have severely inadequate pedestrian facilities, and as such, less than a handful of streets within a quarter mile of 145<sup>th</sup> and 185<sup>th</sup> stations have sidewalks. Existing streets with sidewalks, including the crossing over Interstate 5, are all substandard with limited to no bicycle facilities. According to the LLE Project Final Environmental Impact Statement, there will be approximately 4,800 pedestrians in total walking to and from the 145<sup>th</sup> and 185<sup>th</sup> stations each day, *before* any additional planned density is realized. Enhancing the pedestrian and bicycle access to these stations, especially the I-5 crossings, is therefore critical to getting these riders safely and reliably to these stations.

The City of Shoreline looks forward to partnering with Sound Transit to build the LLE Project and its greatly needed pedestrian, bike and vehicular station area access enhancements. This is a great milestone for the City, region, and FTA.

Sincerely,



Shari Winstead  
Mayor

cc: Shoreline City Councilmembers

**From:** Andy Walgamott [<mailto:awalgamott@media-inc.com>]  
**Sent:** Monday, April 13, 2015 8:40 AM  
**To:** Amy Walgamott  
**Cc:** Krochalis, Rick (FTA); [emailtheboard@soundtransit.org](mailto:emailtheboard@soundtransit.org)  
**Subject:** Re: Comment for entry into the Lynnwood Link Extension Record of Decision.

Please enter these as my comments on the Lynnwood Link Extension Record of Decision as well.

Andy Walgamott  
14802 5th Ave NE  
Shoreline, WA 98155

On Mon, Apr 13, 2015 at 8:36 AM, Amy Walgamott <[wigglemott@gmail.com](mailto:wigglemott@gmail.com)> wrote:  
Dear Mr. Krochalis and Board of Directors,  
I am submitting a comment for entry into the Lynnwood Link Extension Record of Decision.  
I am a homeowner in close vicinity to the 145th Street Station. I have two big concerns about the light rail station and associated structures.

#### 1. Parking garage and traffic

I feel strongly that no parking garage should be built at the 145th Street station. A parking garage will encourage many people to travel to the location by car, increasing traffic to 145th Street and 5th Avenue dramatically. No matter how large a structure Sound Transit builds, it will always overflow. Once people have driven to the station in hopes of finding a parking spot they are not going to drive somewhere else to park. They will park on the neighborhood streets.

Also, the point of light rail is to reduce car use. A parking garage is encouraging people to use cars. The space could be better used to build a bus terminal and taxi stand. This would encourage people to take a bus to the station, or if necessary a taxi or Uber.

Sound Transit should also consider using the funds for the parking garage to rent or buy land for park and ride facilities throughout the Shoreline area and invest in shuttle service from the park and rides to the stations. Parking garages are also crime hubs. Despite design and lighting, parking garages are dangerous, especially for women. If Sound Transit builds a parking garage, it is imperative that it also provide security services to patrol the parking garage 24 hours a day.

Lastly, 145th Street is already at capacity. Barring a new bridge across I-5, there seem to be limited options to increase capacity on 145th. A parking garage will exacerbate this problem. It is naive to think the traffic problem can be alleviated with a couple dedicated turn lanes. There is not enough room on the current bridge to accommodate more traffic.

## 2. Removal of large trees

The DEIS talks about removing large trees and, instead, putting designs on a concrete noise barrier and replanting. Sound Transit needs to evaluate carefully how they can minimize the removal of large trees with design and possibly reorientation of station (and garage, unless this is eliminated). Replantings will take decades to grow into mature trees (50 years or more). Large, mature trees provide habitat for many, many species, including bald eagles in the immediate 145th Street station area. Understandably, some trees will have to be removed in the area of the tracks. However, by not building a parking structure, and by thoughtfully designing the station around mature trees, Sound Transit can drastically minimize the reduction of wildlife habitat and visual impact to neighbors. (please see attached photos)

Visual impact to neighbors is also very important, as is tree cover to the City of Shoreline. The city prides itself on having a higher percentage of tree cover than Seattle and being a Tree City. However, removing many mature trees and leaving neighbors with a view of a designed concrete wall doesn't fall within these values. Sound Transit needs to maximize the number of mature trees kept in place regardless of convenience. The only trees removed should be those in immediate path of the tracks and part of the station building.

Sincerely,

Amy Walgamott  
14802 5th Ave NE  
Shoreline, WA 98155

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Andy Walgamott  
Editor, Northwest Sportsman magazine  
Phone (206) 382-9220 / (800) 332-1736  
Fax: (206) 382-9437  
[awalgamott@media-inc.com](mailto:awalgamott@media-inc.com) / [andy@nwsportsmanmag.com](mailto:andy@nwsportsmanmag.com)  
[nwsportsmanmag.com](http://nwsportsmanmag.com) / [www.facebook.com/NorthwestSportsmanMagazine](http://www.facebook.com/NorthwestSportsmanMagazine) / @NWSportsman  
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REGION 10**

1200 Sixth Avenue, Suite 900  
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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

May 4, 2015

Mr. Richard Krochalis, Regional Administrator  
Federal Transit Administration, Region 10  
915 Second Avenue, Suite 3142  
Seattle, Washington 98174-1002

Mr. Perry Weinberg, Director  
Office of Environmental Affairs and Sustainability  
Sound Transit  
401 South Jackson Street  
Seattle, Washington 98104-2826

Dear Mr. Krochalis and Mr. Weinberg:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the Lynnwood Link Extension (EPA Region 10 Project Number 11-4128-FTA). We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

We appreciate FTA's and Sound Transit's ongoing dedication to and support for environmental sustainability. The Lynnwood Link Extension will serve to increase the transportation choices for a significant number of commuters in the Puget Sound metropolitan area and is a positive contribution to the State's effort to address climate change through the reduction of greenhouse gases. We also appreciate the efforts of Sound Transit to avoid and minimize impacts to sensitive environmental and open space resources, while providing transit, which best supports economic plans and travel needs. This has been and continues to be particularly challenging for Segment C of the project where scarce, high value parkland and aquatic resources at Scriber Creek are in close proximity to high intensity planned land uses in Lynnwood.

**Wetland impacts**

While we recognize the steps that have been taken to reduce impacts to sensitive resources, we do have concerns regarding impacts to the Scriber Creek Wetland Complex, which we hope can be ameliorated with modifications to the Preferred Alternative and through further project planning and design. In response to comments regarding planned land uses, FTA and Sound Transit have included a modified Alternative C3 in Segment C, now identified as the Preferred Alternative. This alternative would result in direct loss of approximately 0.5 more acres of wetland than the previous Alternative C3, and project construction would affect an additional 0.3 acres of wetlands and 0.2 acres of wetland buffer. Although the acreage numbers are small, these additional wetland impacts would occur within and bisect a substantial portion of the Scriber Creek Wetland Complex, a high value Category 2 forested wetland system.

Because the Scriber Creek Wetland Complex has high integrity as a well-functioning ecosystem in a densely populated area, and provides natural open space and other ecosystem services,<sup>1</sup> it could have significant intrinsic value to the City of Lynnwood, its residents, and its businesses. The Scriber Creek Wetland Complex exhibits high levels of ecosystem function and value.<sup>2</sup> It is one of the few remaining remnants of the natural system in an otherwise dense urban environment. Resources upstream and downstream connect with and benefit from its integrity. Even with the use of work trestles, construction impacts would be invasive, resulting in fragmented habitat and long-term degradation or loss of the forested wetland component.<sup>3</sup> These impacts are largely avoidable by incorporating aspects of the previous Alternative C3. With further study and engineering design, it may be feasible to adjust guideway alignment, station location, and/or tail track configuration to better harmonize Alternative C3 with City Center redevelopment plans. We recommend that Sound Transit adjust the Preferred Alternative and project design to improve environmental and community outcomes with respect to these resource impacts.

### **Wetland mitigation**

Individual wetlands and other resource areas that would be adversely affected by project construction and operation would be offset through compensatory mitigation.<sup>4</sup> To mitigate unavoidable impacts, particularly any impacts to Scriber Creek and/or its wetland complex, we recommend that every effort be made to preserve the Scriber Creek wetland complex. This and other mitigation, such as wetland creation or restoration, should be designed to provide the highest ecological and natural area open space benefits to affected ecosystems and communities. We also recommend that compensatory mitigation be used to improve ecological connectivity of both aquatic and terrestrial habitat corridors in the project area, particularly within Segment C.

### **Floodplain impacts**

In Segment C, the Preferred Alternative and other alternatives would place guideway columns in the Scriber Creek floodplain.<sup>5</sup> The FEIS states that Sound Transit would provide compensatory floodplain storage, but no further detail is provided about the nature or location of the compensatory storage. We recommend that efforts to provide compensatory flood storage not result in excavation of the Scriber Creek wetlands or otherwise impact the quality and integrity of the wetland complex. Floodplain creation/restoration should occur offsite in areas connected or in close proximity to the wetland complex.

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<sup>1</sup> FEIS, p. 4-149 through 4-154.

<sup>2</sup> Based on July 2014 field delineations, Ecology staff found that the ordinary high water mark of Scriber Creek through the wetland complex is defined as encompassing the entire breadth of the complex (FEIS, p. 4-148).

<sup>3</sup> FEIS, p. 4-153, 4-154.

<sup>4</sup> FEIS, p. 4-154.

<sup>5</sup> FEIS, p. S-28; p. 4-178, 4-179.

Thank you for the opportunity to review and offer comment on the Lynnwood Link Extension project. We welcome any questions or discussion of these comments. You can reach me at (206) 553-1601 or via electronic mail at [Reichgott.christine@epa.gov](mailto:Reichgott.christine@epa.gov), or Elaine Somers of my staff at (206) 553-2966 or via electronic mail at [somers.elaine@epa.gov](mailto:somers.elaine@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Reichgott". The signature is written in a cursive style with a large initial 'C'.

Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit







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Date: April 17, 2015  
To: Sound Transit Board  
From: Light Rail Review Panel  
Re: Lynnwood Link NE 130th St Station

The Seattle Light Rail Review Panel (LRRP) continues to support the Sound Transit Board of Director's efforts to obtain funding for the proposed light rail extension from Northgate to Lynnwood. However, we have continued to evaluate the potential station at NE 130th Street and have concerns about the approach reflected in the recent Final Environmental Impact Statement (FEIS). We submit the following thoughts in advance of the Board's upcoming vote on station locations.

The LRRP supports locating a station at NE 130th St rather than stations only at Northgate and NE 145th St for the following reasons:

1. Compared to the station under construction at Northgate or the proposed station at NE 145th St, a station at NE 130th St better serves the neighborhoods in and around Bitter Lake and Lake City, two growing hub urban villages that offer affordable housing options and have transit-dependent populations.
2. Because of its lower traffic volumes, planned bicycle facilities, and opportunity for bus route restructuring, NE 130th St is a superior location than Northgate and NE 145th St for connecting non-automobile modes with light rail.
3. A station at NE 130th St offers the potential for greater increased ridership than captured in the FEIS. This and other benefits outweigh the one-minute increase in travel times.

The following discussion expands on each of these arguments.

With membership from the Seattle Design, Planning, and Arts Commissions, the Seattle Light Rail Review Panel is the advisory body that provides integrated review of Sound Transit Link Light Rail projects.

LRRP members are professional from the various fields related to urban development and infrastructure, including urban planners, transportation planners, and developers. The LRRP provided rigorous review of Central Link and University Link and is in the process of reviewing Northgate Link and Rainier Station.

**1. Compared to stations at Northgate or NE 145th St, a station at NE 130th St would better serve the high transit-dependent populations in and around the growing Bitter Lake and Lake City Hub Urban Villages.** Bitter Lake, Haller Lake, and Lake City are some of the most affordable neighborhoods in north Seattle. According to housing rental data from November 2014, median rent in these areas is more than 25% lower than the Seattle median.<sup>1</sup>

Car ownership is also below the citywide average.<sup>2</sup> In these areas, the share of residents who do not own a vehicle is roughly twice that of most other north Seattle neighborhoods. With a station at NE 130th St, these residents could access light rail 15-20 minutes faster on foot, 6-8 minutes faster by bicycle, and 10-12 minutes faster by bus than they could with stations only at NE 145th St and Northgate.

Furthermore, Lake City and Bitter Lake have some of the highest concentrations of communities of color, low-income households, and English language learners among all north Seattle urban villages.<sup>3</sup> Locating a station at NE 130th St increases access to affordable transportation for these communities. This aligns with the goals of Seattle's Race and Social Justice Initiative and the Puget Sound Regional Council's Regional Equity Network and Growing Transit Communities program.

**2. NE 130th St is a better location than either Northgate or NE 145th St for non-automobile connectivity.** Traffic volumes are significantly lower on the NE 130th St/NE 125th St corridor than on either NE 145th St and Northgate Way NE. This is very unlikely ever to change. Congestion will always be higher on NE 145th St and Northgate Way NE because these two arterials have both north- and southbound on- and off-ramps to I-5, whereas NE 130th St has only a southbound on-ramp and northbound off-ramp. Furthermore, unlike NE 145th St, a NE 130th St station would not include a parking facility, so vehicle volumes on NE 130th St would not increase due to new park-and-ride traffic.

Lower traffic volumes offer two primary benefits. First, it makes NE 130th St a superior option for feeder buses connecting Bitter Lake, Haller Lake, Broadview, and Lake City with light rail. Seattle has several north-south "spines" but few efficient east-west "ribs." NE 130th St is one of the few arterials where buses can effectively extend light rail access further into north Seattle neighborhoods without becoming mired in the congestion of NE 145th St and Northgate Way NE. Given that King County Metro plans to reconfigure its service in response to upcoming stations at UW and Northgate, a similar approach could improve bus-rail connections across this segment of north Seattle, thereby increasing ridership on the Lynnwood Link Extension.

While some Lake City commuters would likely continue to use express buses to downtown Seattle, residents in Pinehurst and other neighborhoods between I-5 and Lake City Way would benefit from light access at NE 130th St. And for all Lake City residents, easy access to light rail via NE 130th St would offer new reliable northbound service for commuters to Shoreline, Mountlake Terrace, and Lynnwood.

Second, lower traffic volumes make NE 130th St a better corridor for safe and direct bicycle and pedestrian connections. The City of Seattle plans to construct protected bike lanes on NE 130th St in 2016. Connecting cyclists from Lake City or Bitter Lake to stations at NE 145th St or Northgate Way NE would require additional cost, result in a longer trip, and place cyclists in a more dangerous, higher-traffic roadway. Pedestrians along NE 130th St would benefit from a quicker, safer, and more pleasant route to access to light rail. Sidewalks east of the station are often buffered from the roadway by a planting strip, and NE 125th St has half as many travel lanes as NE 145th St or Northgate Way NE.

**3. Ridership at NE 130th St is underestimated in the FEIS, making the aforementioned benefits far outweigh the minor drawbacks.** The FEIS assumes that a NE 130th St station would primarily attract riders who would otherwise use the Northgate or NE 145th St stations, significantly reducing potential ridership

1 Dupre + Scott Apartment Advisors, Inc. (November 2014)

2 2013 5-year American Community Survey.

3 Ibid.

gains. However, this employs a rudimentary conception of a station's ridership area. The FEIS discounts the aforementioned time savings for residents in surrounding neighborhoods that would walk, bike, or ride the bus to access light rail. A 10-minute shorter trip from Bitter Lake to light rail will attract new ridership that otherwise will choose not to use — or will not be able to access — light rail whatsoever. The increased speed and reliability of feeder buses serving NE 130th St effectively increases the ridership area for a station at that location.

Furthermore, ridership estimates in the FEIS reflect a potential rezone at NE 145th St but do not consider potential land use changes at NE 130th St. While current zoning and land uses near the potential NE 130th St station limit opportunities for transit-oriented development (TOD) in this location, the surrounding neighborhoods are broadly supportive of it. As part of the update to the Comprehensive Plan, the City of Seattle is considering designating a new urban village at this station area and could therefore amend land use regulations to facilitate TOD. In the Bitter Lake Hub Urban Village alone, there is capacity for over 10,000 residential units under existing zoning, all within all within a one-mile walk of the station.<sup>4</sup> Given the challenges of developing TOD, this is a secondary benefit that the Sound Transit Board should consider.

Finally, the drawbacks to providing this station are minor compared to these benefits. Adding a station at NE 130th St would increase travel times on Lynnwood Link by one minute. This is insignificant considering alternate modes of travel. Currently, travel from Lynnwood to downtown Seattle regularly takes over an hour by car in morning traffic and 45 minutes by bus using the HOV lanes — though congestion frequently increases these times. Even with a loss of one minute, light rail would connect these two destinations in under half an hour. From 2011 to 2013, average morning peak hour travel times on I-5 from Everett to Seattle increased 10 minutes due to congestion.<sup>5</sup> Concern over a additional minute of travel time for light rail should consider that in recent years travel times for single-occupancy vehicles on the I-5 corridor have increased one minute roughly every three months.

**In closing, the LRRP sees significant merit to locating a station at NE 130th St because it optimizes non-automobile connectivity and extends transit access to currently underserved neighborhoods where transit dependence is high — with an inconsequential increase to travel time.** Given recent and projected growth in and around Lake City and Bitter Lake and their above-average concentrations of marginalized populations, access to regional light rail for those residents is an immediate and direct need. This calls for providing this station sooner rather than later.

### **Shannon Loew, Chair**

Seattle Light Rail Review Panel

Cc: Mayor Ed Murray  
Seattle City Councilmembers  
Scott Kubly, Director Seattle Department of Transportation  
Diane Sugimura, Director, Seattle Department of Planning and Development  
Vanessa Murdock, Director, Seattle Planning Commission  
Ruri Yampolski, Public Art Director, Seattle Office of Arts & Culture

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4 "Development Capacity Report – September 2014." DPD. [http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web\\_informational/p2182731.pdf](http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2182731.pdf)

5 "The 2014 Corridor Capacity Report." WSDOT. <http://wsdot.wa.gov/publications/fulltext/graynotebook/CCR14.pdf>