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**From:** Anderson, Suzanne NWS <Suzanne.L.Anderson@usace.army.mil>  
**Sent:** Friday, July 19, 2013 8:51 AM  
**To:** Swift, Lauren  
**Cc:** Bennett, Matthew J NWS; Mcandrew, Rebecca E NWS  
**Subject:** NWS-2011-964 Sound Transit (Lynnwood Link) (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Hi Lauren,

**F-001-001** We received the box of documents related to the Sound Transit Lynnwood Link Extension project, including:

- Draft EIS
- Transportation Technical Report
- Ecosystems Technical Report
- Historic, Cultural, Archaeological Technical Report
- Noise and Vibration Technical Report

The transmittal cover letter indicated that the box included a copy of "*Executive Summary Lynnwood Link Extension Light Rail Project Draft EIS*", but I did not find that document.

I took a quick look through the Ecosystems Technical Report, and we have no comments at this time.

Since the wetland and stream assessments were conducted primarily at a reconnaissance level of effort, and compensatory mitigation is proposed only on a conceptual basis, we will expect submittal of a formal delineation report and mitigation plan concurrent with the JARPA submittal.

Please let me know if you have any questions.

Suzanne

Suzanne Anderson, PhD, PWS  
Project Manager/Ecologist  
Seattle District Regulatory Branch  
U.S. Army Corps of Engineers CENWS-OD-RG  
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## F-001-001

Thank you for your letter. The Executive Summary is a section of the bound Draft EIS. Thank you for your initial review of the Ecosystems report; several of the alternatives under consideration have wetlands impacts, and the Final EIS includes updated information on the wetlands in the area as well as design refinements that have been made since the Draft EIS. Potential mitigation measures have also been defined in more detail. A wetland delineation report and other materials will be provided as part of the project's Joint Aquatic Resources Permit Application.

Classification: UNCLASSIFIED  
Caveats: NONE



United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
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Portland, Oregon 97205-3026



9043.1  
IN REPLY REFER TO  
ER13/503

*Electronically Filed*

September 20, 2013

Lauren Swift  
Sound Transit  
401 S. Jackson St.  
Seattle, WA 98104

Dear Ms. Swift:

**F-002-001** | The Department of the Interior has reviewed the Draft Environmental Impact Statement for the Lynnwood Link Extension. The Department does not have any comments to offer.

We appreciate the opportunity to comment.

Sincerely,

Allison O'Brien  
Regional Environmental Officer

**F-002-001**

Thank you for your review. Sound Transit and FTA have continued coordination with the Department in concluding the project's Section 4(f) analysis in the Final EIS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

September 23, 2013

Mr. Dan Drais  
Federal Transit Administration  
915 Second Avenue, Suite 3142  
Seattle, Washington 98174-1002

Mr. Perry Weinberg  
Sound Transit  
401 South Jackson Street  
Seattle, Washington 98104-2826

Re: Lynnwood Link Extension Draft Environmental Impact Statement  
EPA Region 10 Project Number: 11-4128-FTA.

Dear Mr. Drais and Mr. Weinberg:

The U.S. Environmental Protection Agency has reviewed the Lynnwood Link Extension Draft Environmental Impact Statement. 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 this opportunity to participate in the NEPA process.

Sound Transit proposes to expand the regional light rail system north from Seattle to Lynnwood, Washington. The corridor is 8.5 miles long and generally follows I-5 from Northgate in King County to Lynnwood in Snohomish County. Six alternatives are evaluated in Segment A (Seattle to Shoreline); four alternatives in Segment B (Shoreline to Mountlake Terrace); and three alternatives in Segment C (Mountlake Terrace to Lynnwood). Because the Sound Transit Board of Directors will identify a preferred alternative based on information in the Final EIS, the Draft EIS does not identify a preferred alternative.

We commend FTA and Sound Transit for including an array of alternatives, which enable decision makers to avoid impacts to communities and the natural environment to a greater extent. We also appreciate your agencies' continued efforts to refine alternatives to further reduce impacts identified through the NEPA process.

Our overall rating for the Draft EIS is EC-2, Environmental Concerns, Insufficient Information. This is based on our concerns regarding specific alternative alignments within Segments B and C that would result in impacts to aquatic resources and Section 4(f) resources that are avoidable through the selection of other available alternatives. However, we rate most alternatives – specifically the alternatives within Segment A, and Alternatives B1, B4, and C3, as LO, lack of objections. An explanation of these ratings is enclosed for your use and information.

#### F-003-001

Thank you for your review and comment on the Draft EIS. The northern part of the Preferred Alternative analyzed in the Final EIS is a modification of the Alternative C3 that was discussed in the Draft EIS. Please see the Final EIS for the description of the Preferred Alternative and its potential effects. Sound Transit has provided responses to your specific comments in the following pages, but to summarize:

- a. On the need for a full 404(b)(1) analysis, of the alternatives, please see response to comment 3.
- b. On added discussion of Scriber Creek Park impacts, and potential impacts, please see our more detailed response to comment 7; however, the impacts to the park and surrounding wetland complex area for these alternatives were described in notable detail in the Draft EIS in sections 4.4. Social Impacts, 4.5, Visual and Aesthetics (including simulations of alternatives), 4.7 Noise and Vibration, 4.8 Ecosystem Resources, 4.17 Parks and Recreation, and 4.18 Section 4(f). Chapter 7 of the Final EIS describes the public comments received overall, and highlights the many comments opposing alternatives impacting the park and wetlands.
- c. The information on Scriber Creek Park has been updated in the Final EIS in Section 4.17 to also note the funding source of the park. Similar information on the other directly impacted park, Ridgecrest Park in Shoreline, has also been included, along with a description of Sound Transit's commitment to meet the requirements of the funding programs where conversion of parkland is involved.
- d. On ecological connectivity, please see response to comment 8.
- e. On additional detail for the wetlands and ecological impacts of the OMSF facility, Sound Transit has since issued a Draft EIS on that project

F-003-001

F-003-001

We recommend that the following information be provided in the final EIS:

- A 404(b)(1) analysis of alternatives, particularly for Segments B and C.
- More complete disclosure of impacts from Alternatives C1 and C2 to describe the effects from construction and operation of the light rail project within Scriber Creek Park and Wetland Complex. For example, consider the change in experience for park users and wildlife with noise and disturbance from passing trains every 4 minutes, the potential for disproportionate impacts to low income, minority, disabled, and transit dependent populations, and the nature of public comments on the alternatives.
- Identification and listing of land purchase funding sources for and any use restrictions applied (such as Native Growth Protection Areas) to parks and natural areas that would be affected by the proposed project, including but not necessarily limited to Scriber Creek, Scriber Creek Park, Scriber Creek wetland complex and associated natural upland areas and buffers.
- Effects on and potential to maintain or restore ecological connectivity in the project area.
- More specific information regarding the impacts that would cumulatively accrue to the natural area habitats, functions, and values, and the community open space and values of Scriber Creek Park and Scriber Creek wetland complex from the potential selection of the Lynnwood alternative for the Sound Transit Light Rail Operations and Maintenance Satellite Facility (OMSF).
- Cost projections that factor in the likely lower mitigation costs associated with Alternative C3 vs. C1 and C2.
- Information regarding the adequacy of parking to meet demand during and after project construction

Our detailed comments and recommendations regarding the proposed project are enclosed. We thank you for the opportunity to participate in the Lynnwood Link Extension project, and are grateful for the site visit, which provided valuable information and insights on the project alternatives. If you have questions or would like to discuss these comments, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Elaine Somers of my staff at (206) 553-2966 or by electronic mail at [somers.elaine@epa.gov](mailto:somers.elaine@epa.gov).

Sincerely,



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

Enclosures

that incorporated the Lynnwood Project impact estimates, and Sound Transit is now completing a Final EIS for the OMSF; the Preferred Alternative for that project is a Bellevue site. The Lynnwood Link Extension Final EIS discussion in Section 4.8 Ecosystems incorporates the findings from the OMSF Draft EIS.

f. Please see response to comment 5.

g. Please see response to comment 13.

**U.S. Environmental Protection Agency  
Detailed Comments on  
Lynnwood Link Extension Draft EIS**

- F-003-002 Preferred Alternative Selection**  
We have no objections or comments regarding the Segment A alternatives. However, there are a number of prominent issues that inform the selection of a preferred alternative in Segment C, and we discuss one with respect to Segment B. Among these are: impacts to ecosystem/aquatic resources, impacts to Section 4(f) resources, and community/environmental justice impacts. We discuss these aspects in their respective sections below:
- F-003-003 Aquatic Resources**  
We appreciate that there are a range of alternatives for each project Segment, which affords the opportunity to avoid impacts to sensitive aquatic resources. The Draft EIS provides information that is usable for a 404(b)(1) analysis, such as the number of acres of wetlands, streams, and buffers that would be affected, but does not attempt to provide a complete 404(b)(1) analysis for the purposes of permitting under Section 404 of the Clean Water Act. The 404(b)(1) analysis would disclose information for the public and decision makers that is vital to selecting a preferred alternative.
- Recommendation:* Include a 404(b)(1) analysis in the Final EIS.
- F-003-004** In Segment C, based on direct and indirect impacts to aquatic resources we would identify Alternative C3 as the environmentally preferred alternative, with Option 1 in the I-5 median as preferred over Option 2 west of I-5. While Alternative C1 has a slightly smaller wetland impact (a difference of 0.1 acre), it would result in other significant and difficult to mitigate impacts, including impacts to Scriber Creek Park and Park users and numerous residential and commercial displacements. Alternative C2 would result in the most direct and indirect wetland impacts to the high value Category II Scriber Creek wetlands through direct habitat loss, fragmentation of the Scriber Creek Wetland Complex, and all associated effects to the plant, animal, and human community of park users.
- Recommendation:* In Segment C, we support Alternative C3 as the Preferred Alternative.
- F-003-005** The discussions regarding cost for the various Segment alignments (p. 5-13) do not appear to include the costs of environmental mitigation for unavoidable impacts, such as, wetland impacts.
- F-003-006** In Segment B, Alternatives B1 and B4 have fewer wetland impacts, less impervious surface and resulting water quality impacts, and less cut and fill. Based on these factors, we would expect that either Alternative B1 or B4 could qualify as the Least Environmentally Damaging Alternative for the purposes of 404 permitting.
- Recommendation:* In Segment B, to minimize impacts to aquatic resources we support Alternative B1 or B4 as the Preferred Alternative.
- F-003-007 Community Impacts, Environmental Justice**  
We commend FTA and Sound Transit for integrating the discussion of transportation, property, land use, economics, visual and aesthetic resources, air quality, noise and vibration, parks and recreation

**F-003-002**

Sound Transit appreciates EPA's comments on the alternatives by segment, including EPA's description of impacts that are of concern.

**F-003-003**

The wetlands analyses in the Draft and Final EIS were based on conceptual engineering. They estimate impacts conservatively without attempting to judge the effectiveness of potential avoidance and minimization measures. Because they are primarily intended to help decision makers compare the impacts of the alternatives, they lack the detail required to support an actual permit application. While the Final EIS analysis is more refined than the Draft EIS, with some field delineations performed, the level of design information and agency coordination on potential avoidance measures that could be incorporated would make a Sec. 404(b)(1) analysis premature. The Final EIS acknowledges the alternatives analysis requirement and also identifies which alternatives would have lower levels of wetlands impacts. If appropriate for the Preferred Alternative, Sound Transit will prepare a 404(b)(1) analysis as part of project permitting, but also anticipates that the impacts for the Preferred Alternative would be below the levels requiring the analysis.

**F-003-004**

Thank you for identifying the Segment C alternative EPA finds as environmentally preferred. Sound Transit has identified a modified Alternative C3, with an alignment west of I-5, as part of the Preferred Alternative.

**F-003-005**

The cost estimates presented in Chapter 5 for the alternatives consider the need for environmental mitigation. The estimates apply a risk-based contingency amount because project design is still underway and

**F-003-007** resources, and public services in the section on "Social impacts, Community facilities, and Neighborhoods" (p. 4-48). We believe this adds value to the analysis and discussion of impacts in the NEPA document (and recommend that it be done in future analyses).

For example, within the Segment C project area, there is a higher than average population of minority residents (37% vs. 32.7% average for King and Snohomish Counties) and, as stated in the Draft EIS (p. 4-51), the residents within the project corridor are generally less well off than residents in the two-county region. Household income is lower than the regional median (85% of the regional median) and 11.3% live at or below the federal poverty level. An estimated 4% of households are transit-dependent, but 3 neighborhoods (Pinehurst, South Lynnwood, and Lynnwood City Center) have more transit-dependent households (7 to 8%). As further evidence of economic condition, 46% are renter-occupied homes; 54% are owner-occupied.

Lynnwood is a heavily urbanized area with few parks and open spaces to serve a largely disadvantaged population. We believe these conditions should weigh heavily in the selection of a preferred alternative within Segment C. Clearly, Alternative C3 would avoid and minimize residential and business displacements (1 business displacement), and would avoid and minimize impacts to Scriber Creek Park (a Section 4(f) resource) and wetland complex, which, based on citizen response to the proposed alternatives since release of the Draft EIS, is much beloved and of disproportionately high value for the affected community. Our site visit to the Park and wetland complex on 9-16-13 revealed it to be an exceptionally high value wetland and natural area, despite its relatively small size. It clearly serves as a tranquil island amid widespread human development.

*Recommendations:* Provide information in the Final EIS to disclose and characterize the high ecological and community values of Scriber Creek Park and Wetland Complex. Avoid and minimize impacts to Scriber Creek Park and Wetland Complex and residential and business displacements. Alternative C3 is most effective in both respects.

**F-003-008** **Ecological Connectivity**  
We agree that long term impacts on ecosystem resources (p. 4-135) may include loss or degradation of terrestrial habitat, including habitat connectivity. The Draft EIS does not provide adequate information about habitat connectivity and the extent to which it exists in the project area and beyond. If there are habitat corridors that are currently providing function in this manner, they should be identified and those functions protected and maintained or potentially enhanced as part of the project, where possible.

*Recommendation:* Describe the Affected Environment, Environmental Consequences, and possible mitigation for impacts to ecological connectivity for the proposed project.

**F-003-009** **Cumulative Effects**  
The Draft EIS includes the proposed Lynnwood site for the Light Rail Operations and Maintenance Satellite Facility in the discussion of cumulative effects. This is helpful and appropriate, however, more specific information regarding the location, extent, and nature of the potential impacts from the OMSF should be provided. While a full analysis will occur in a subsequent EIS, it is not possible to determine whether the direct and/or indirect effects of the OMSF Lynnwood site would compromise the integrity of Scriber Creek Park and wetland complex.

specifics about the extent and cost of mitigation would be affected by a variety of factors and decisions that would be considered with more advanced design and permitting as the project progresses. Sound Transit understands that the cost of mitigation will vary depending on the alternatives chosen, but believes that the cost ranges used in the Draft EIS accurately convey the potential difference that mitigation could make for the project alternatives.

**F-003-006**

Thank you for identifying the Segment B alternative EPA finds as environmentally preferred. The Final EIS contains additional information on refinements that Sound Transit has made to Alternative B2 to help reduce some of the ecosystem and water resource effects noted in EPA's comments.

**F-003-007**

Chapter 7 of the Final EIS describes public comments on the alternatives, including the comments regarding the importance of Scriber Creek Park and the associated wetland complex.

Sound Transit notes EPA's recommendations for Alternative C3, which identified the ability to avoid the park impacts, minimize Scriber Creek wetlands impacts, and reduce other property impacts. The Sound Transit Board selected a modified Alternative C3 as the Preferred Alternative for this segment of the light rail facility, requesting further consideration of other factors that could improve the alternative, including preserving redevelopable lands, improving the connections to the transit center, and minimizing stream and wetland impacts. The importance of the Scriber Creek wetland complex was identified in Ecosystems Technical Report as well as the Ecosystems section the Draft EIS (Section 4.8), but is also discussed in Section 4.4 Social. The Final EIS provides updated discussion of the park and its associated wetlands for all alternatives, as

**F-003-009** | *Recommendation:* In the Final EIS, provide more information regarding the potential effects of the OMSF Lynnwood site on the Scriber Creek Park and wetland complex.

**F-003-010** | **Land Use Legal Restrictions**  
The Draft EIS states that no parklands were purchased with Land and Water Conservation Funds, and therefore there are no Section 6(f) resources. However, the Draft EIS provides no information regarding the actual source of funding or authorization to designate the project area parks, particularly Scriber Creek Park. Because the Scriber Creek Wetland Complex has been retained thus far, the legal restrictions and requirements relevant to its protection should be fully identified and disclosed. For example, federal, state, and local protections should be discussed and upheld, including any potential Native Growth Protection Areas, mitigation actions, or other designations that may have been established pursuant to past development activities.

*Recommendation:* In the Final EIS, disclose the above legal requirements and restrictions that apply to Scriber Creek, Scriber Creek Park, and Scriber Creek Wetland Complex.

**F-003-011** | **Project Cost and Mitigation**  
The discussions regarding cost for the various Segment alignments (p. 5-13) do not appear to include the costs of environmental mitigation for unavoidable impacts, such as, wetland impacts. The Draft EIS indicates that Alternative C3 has the shortest guide way length and a slightly higher amount of property acquisition than C2. Because C2 would impact almost an acre of high value Category II wetlands (vs. 0.2 acre for C3), Alternative C2 mitigation costs would be higher than for C3.

*Recommendation:* Factor mitigation costs into any cost comparisons presented in the EIS.

**F-003-012** | The Draft EIS states (p. 4-145) that temporary work bridges could be used in extremely sensitive areas, such as the Scriber Creek wetland complex. While extremely sensitive areas should be avoided, for any work that may directly or indirectly affect them, such measures should be applied as needed.

*Recommendation:* Incorporate Context Sensitive Design, Solutions, and construction practices where and whenever there are highly sensitive resources, and as a routine way of doing business.

**F-003-013** | **Parking**  
The Draft EIS indicates that the Lynnwood Park and Ride is currently at full capacity and that both on- and off-street parking are anticipated to be removed due to the placement of the light rail stations and other project modifications (p. 3-39). While further refinement of parking needs and provision may occur in future phases of the project (p. 3-40), to maximize ridership and availability of transit as a travel option, there needs to be adequate parking.

*Recommendations:* The amount of parking provided at each station should be further refined to ensure that supply would meet demand. We also encourage efforts to mitigate, i.e., provide some temporary parking, agreements with businesses to use underused lots, shuttle service, etc., the loss of available parking during construction that would affect the Lynnwood Park and Ride.

well as information about the Preferred Alternative with the modified Alternative C3.

**F-003-008**

The Final EIS provides more detail on habitat connectivity in Section 4.8.1, Affected Environment; Section 4.8.2, Long Term Impacts; and Section 4.8.3, Construction Impacts. Habitat connectivity will continue to be considered as part of the mitigation process for avoidance and minimization and included in selection of compensatory mitigation for ecosystem resources. Please note also that the Ecosystems Technical Report has more detailed discussions of connectivity and continuity issues, particularly for stream habitat.

**F-003-009**

At the time of the publication of this project's Draft EIS, design work and effects analysis for the Operations and Maintenance Satellite Facility (OMSF) project was still underway and details were not available for detailed discussion in this document. However, Sound Transit has augmented the discussion of OMSF cumulative effects in the Final EIS, and notes the higher level of potential effects to the Scriber Creek wetland complex if the Lynnwood Site for the OMSF project were developed. The OMSF Draft EIS was published on May 9, 2014.

**F-003-010**

Sound Transit has reviewed the funding sources used to develop directly impacted parklands and has included in the Final EIS a commitment to meet applicable park land or funding replacement requirements (Section 4.1 Acquisitions and Section 4.17 Parks and Recreation both have updated text). Section 4.8.2 and the Ecosystem Resources Technical Report of the Final EIS also have updated discussions of ecosystems impacts to the complex.



**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

The large undeveloped parcel directly south of Scriber Creek Park is publicly held, but does not appear to have other protections or designations for those properties other than critical area ordinances and other existing federal, state, and local regulation for streams and wetlands. Additional reviews would be conducted for any property Sound Transit would use for construction and operation of the project, and Sound Transit would satisfy any applicable regulatory or legal requirements.

**F-003-011**

Please see the response to comment F-003-005.

**F-003-012**

Sound Transit's policy [Executive Order No. 1, Establishing a Sustainability Initiative for Sound Transit (2007)] on ecosystem mitigation is to avoid impacts on environmentally sensitive resources to the maximum extent practicable and to provide adequate mitigation to ensure no net loss of ecosystem function and acreage as a result of agency projects. The Final EIS includes further measures to minimize impacts and describes mitigation in more detail. For Scriber Creek, Sound Transit's potential mitigation includes temporary work trestles, although final design and permitting would confirm the ultimate approach.

**F-003-013**

Section 3.2.7 of the Final EIS and Section 5.7 of the Transportation Technical Report includes additional discussion of parking at the Lynnwood station. Section 5.1 of the Transportation Technical Report discusses how ridership estimates reflect the ways riders are expected to access the station; many future riders are expected to take transit, walk or bike, in addition to choosing to park. Sound Transit has also considered options that would increase the parking supply at the

station. However, the provision of parking for transit centers is not made solely on estimates of unconstrained demand for parking, but must factor in local and regional plans and policies, the cost of additional parking, and environmental impacts. In Lynnwood, where the current park-and-ride is already a major hub for transit transfers, Sound Transit anticipates that transit transfers at the station as well as walking and biking will continue to increase in popularity, in keeping with the higher-density developments that Lynnwood anticipates near the station. Finally, Sound Transit identifies mitigation measures to address potential spillover parking that could occur.



United States Department of the Interior

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IN REPLY REFER TO:  
ER13/503

*Electronically Filed*

September 27, 2013

Lauren Swift  
Sound Transit  
401 S. Jackson St.  
Seattle, WA 98104

Dear Ms. Swift:

On September 20, 2013, the U.S. Department of the Interior (Department) submitted a letter to you stating that we had no comments to offer regarding the Draft Environmental Impact Statement (DEIS) for the Lynnwood Link Project. Although the comment period for the DEIS has ended, the Department respectfully submits the following comments focused on the Section 6(f) evaluation for the project.

**F-004-001** Section 4.18.3 of the DEIS is incorrect in stating that there are no Land and Water Conservation Fund (LWCF) properties within the Project area. There are two LWCF protected parks within the Project area: Twin Ponds in Shoreline (53-00082) and Jack Long in Montlake Terrace (53-00072).

Furthermore, under Alternative A5, Sound Transit has identified that parking at Twin Ponds may be used for light rail purposes. The National Park Service, a component bureau of the Department, would consider this a conversion of recreation use to transportation use, and such a conversion has not been correctly identified in the accompanying Section 6(f) analysis as constituting an impact.

Thank you for the opportunity to review this document. For additional information or assistance with addressing these points in preparing the Final EIS, please contact Ms. Heather Ramsay, Program Officer, State & Local Assistance Programs, Pacific West Region, 909 First Avenue, Seattle, WA 98104 (206) 220-4123. If you have any other questions, please contact me at (503) 326-2489.

Sincerely,

Allison O'Brien  
Regional Environmental Officer

**F-004-001**

Thank you for the additional information on LWCF-funded resources in the project vicinity. Sound Transit has conducted additional reviews of the funding sources used to develop parklands and has included this information in the Final EIS. Sound Transit has also defined measures to avoid the potential for transit-related parking at Twin Ponds Park. Parking for transit purposes is not proposed at the park and signage restricting time periods would be an effective means of preventing unauthorized parking at the park. The project's Preferred Alternative does not include a station at NE 155th Street, which also avoids the potential for such impacts to the park.



AMBASSADOR OF THE REPUBLIC OF LATVIA  
2306 MASSACHUSETTS AVENUE, NW, WASHINGTON, DC 20008, USA

Washington D.C.  
September 20, 2013  
No. 22.1.-912

Sound Transit  
Comments c/o Lauren Swift  
401 Jackson St.  
Seattle, WA 98104

Dear Sir/Madam,

F-005-001

As the Ambassador of the Republic of Latvia to the United States I have been approached by the World Federation of Free Latvians, the American Latvian Association in the United States and the Latvian Community in Seattle regarding the next extension of the Sound Transit system in the Seattle area that might negatively affect the Latvian church and Community Center house in the city, possibly leading to the destruction of the Center.

The Latvian community in Seattle is among the largest and most active Latvian communities in the United States. Their Community Center house possesses an impressive cultural and historic heritage for Latvians living in the US. It would be of great loss to the very vibrant and exceptionally warm US-Latvian relations as well to see that the building might perish because of the extension of the Lynwood Link railway line.

I would like to hope that an alternate solution can be found and this particular property will remain unaffected.

Please give this matter your closest attention.

Yours Sincerely,

Andris Razāns  
Ambassador of Latvia in the US



**F-005-001**

Sound Transit and the Federal Transit Administration appreciate the letter describing your concerns about the potential displacement of the Latvian Evangelical Lutheran Church under the Draft EIS Alternatives A1, 5, and 10 of Sound Transit's Lynnwood Link Extension. Since the publication of the Draft EIS, Sound Transit performed additional engineering that eliminates the need to displace the Latvian Evangelical Lutheran Church. Chapter 2, Alternatives, in the Final EIS describes the refinements, and Section 4.1 describes the acquisition impacts. In addition, compensation would be provided to the church where minor acquisitions of land from the church property would be needed, as required by the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.