



March 30, 2018

Joel Theodore, PE
LLE Corridor Design Manager - Civil
Sound Transit
401 South Jackson Street
Seattle, WA 98104

RE: Sound Transit Lynnwood Link; Stormwater Water Quality Management in Shoreline

Dear Joel,

Sound Transit (ST) has asked the City of Shoreline (City) to specifically define if the light rail guideway will be considered Pollution Generating Impervious Surface (PGIS) or a Non-Pollution Generating Impervious Surface (NPGIS). Additionally ST has asked what, if any, Water Quality BMPs would be imposed for the guideway stormwater runoff within the City of Shoreline. Sound Transit provided to the City a package of documents supporting ST's position that the guideway be treated as a NPGIS to help the City in evaluating this question. The NPGIS document package included the following information: Washing Department of Ecology letter, a study on Modeling of Ballasted Tracks for Pollutants, technical memos characterizing stormwater runoff, Breakpad Material Safety Data Sheet, Letters from NOAA and USFS on this issue, and letters from other local jurisdictions detailing their conclusions from evaluating this same package.

The City has reviewed the information provided by ST and finds that the information submitted does not have adequate research or scientific data to conclude that the trackway is NPGIS. However, the City recognizes other local jurisdictions including Seattle, Redmond, and Bellevue have reached the conclusion or determination to classify the guideway runoff as NPGIS. The City did not find the Colorado study provided to be relevant or recent enough to help us reach a conclusion. Sound Transit should have more current and relevant data based on existing ST guideway/trackway throughout the region. In absence of this data, the City will rely on the conclusions by the other agencies. As a result, the City will not require water quality treatment for the guideway stormwater runoff. Flow control, however, is still required and is not impacted by this decision.

Should additional data become available or the Department of Ecology determines the guideway/trackway is PGIS during the design phase of the project, the City reserves the right to modify this conclusion and if appropriate require water quality treatment.

We look forward to continuing work with Sound Transit to bring the Lynnwood Link light rail through our city and beyond.



Sincerely,

Tricia Juhnke, PE
City Engineer

Cc: Juniper Nammi, Sound Transit Project Manager
Robert Eddy, Development Review Engineer
Uki Dele, Surface Water and Environmental Services Manager