



SHORELINE
CITY COUNCIL

Keith A. McGlashan
Mayor

Chris Eggen
Deputy Mayor

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Chris Roberts

Jesse Salomon

Shari Winstead

September 16, 2013

Sound Transit DEIS
Comments c/o Lauren Swift
401 S. Jackson Street
Seattle, WA 98104

**Re: Draft Environmental Impact Statement for the Lynnwood Link
Extension**

Dear Ms. Swift:

The City of Shoreline would like to take this opportunity to provide Sound Transit with our comments in response to the Draft Environmental Impact Statement for the Lynnwood Link Extension. The City appreciates the opportunities to participate in Sound Transit's planning process to date and the regular updates provided by Sound Transit staff throughout this process.

The City of Shoreline is excited about the extension of light rail to Shoreline in the near future. It is our City's belief that effective, fast and reliable transit service benefits our residents and the region as a whole in a variety of ways. Expanded mobility options, reduced congestion and minimizing our contribution to climate change are just a few of the benefits of a robust transit system that also mirror the goals of our Council and Shoreline's adopted plans and policies. Shoreline citizens overwhelmingly supported Sound Move and ST2.

The City's primary interest with the Lynnwood Link Extension is the inclusion of two light rail stations in Shoreline. In April 2012, the Shoreline City Council identified NE 145th Street and NE 185th Street as the two preferred station locations in Shoreline and sent a letter to the Sound Transit Capital Committee stating this preference. A copy of this letter is enclosed. After reviewing the DEIS and consideration of the impacts of the Lynnwood Link Extension, the City of Shoreline remains committed to this preference. We believe that with appropriate mitigation, NE 145th Street and NE 185th Street locations represent the best alternatives for Shoreline and the region and will result in the most successful project outcome for both Sound Transit and the City of Shoreline.

The alternatives considered in the DEIS identify two station pairings in Shoreline: NE 145th Street and NE 185th Street and NE 155th Street and NE

185th Street. Shoreline believes that a station at NE 145th Street is preferable to a station at NE 155th Street for several reasons. First, a station at NE 145th Street will serve as a regional station. Due to its proximity to Bothell Way NE/Lake City Way NE (SR 522), the NE 145th Street station will act as the primary station for residents of Lake Forest Park, Kenmore, Bothell and potentially points east. Several of these jurisdictions, as well as other agencies throughout the region, have provided Sound Transit with letters of support for the NE 145th Street station. Additionally, we believe close proximity to a main thoroughfare is the most appropriate location for a regional station and NE 145th Street provides this access. Most importantly, the voter approved ST2 package included stations at NE 145th Street and NE 185th Street.

In anticipation of identification of the Preferred Alternative by the Sound Transit Board, the City of Shoreline has already begun station area planning which includes increasing density around stations to facilitate transit oriented development. A significant component of that work is the evaluation of multi-modal access to the stations, with the intent of identifying new pedestrian, bicycle and transit improvements near the stations. Additionally, the City of Shoreline is leading a multi-jurisdictional planning effort for the 145th Street corridor that will evaluate and ultimately identify the necessary improvements to the roadway for vehicles, buses and nonmotorized users. These improvements will not only help to improve multimodal access to the station, they will help facilitate transit oriented development through additional and upgraded pedestrian facilities and an improved roadway for transit connections that will allow residents to access neighborhoods beyond the light rail station. Shoreline is evaluating the potential annexation of NE 145th Street from the City of Seattle and King County and has begun discussions with these jurisdictions, subject to the designation of a light rail station at NE 145th Street in the Preferred Alternative.

We believe that a station at NE 155th Street will result in significant negative impacts to the surrounding stable, single family neighborhood. The area around the proposed station, as well as properties along the 155th Street corridor, is almost entirely single family residential. The 145th Street corridor includes a mix of multi-family residential, commercial and single family uses. Because 155th Street carries anywhere from one-quarter to one-half of the daily traffic of 145th Street, the traffic impacts associated with a station at NE 155th Street will be much more significant compared to those associated with a station at NE 145th Street. The Shoreline Fire District has a fire station on NE 155th Street located between the proposed light rail station and parking structure. They have written to Sound Transit expressing their concerns that a light rail station at NE 155th Street may negatively impact emergency response times due to the increased vehicle and bus traffic associated with the station.

The City's specific station design preferences include:

- NE 145th Street: Develop a station with an associated 500 space parking facility located just north of the overpass, primarily in the vegetated area between the bridge and a relocated northbound on-ramp, as shown in Alternative A3, Option 2.
- NE 185th Street: Develop an at-grade station on the east side of I-5 with an associated 500 space parking structure located on the west side of I-5, primarily within the I-5 right-of-way and mostly below the grade of NE 185th Street and 5th Avenue NE, as shown in Alternative A1, Option 1.

The City of Shoreline recommends Sound Transit construct a track alignment that is at-grade as much as possible in order to minimize cost, visual and noise impacts. All elevated sections of the alignment need to be designed in a manner that does not impede any future modifications to the interchanges at NE 145th Street, NE 175th Street and NE 205th Street.

Four of the alternatives included in the DEIS include three stations in King County while the ST2 package only anticipated two, both of which are in Shoreline. The Preferred Alternative selected by the Sound Transit Board needs to include two light rail stations in Shoreline at NE 145th Street and NE 185th Street, consistent with the voter approved ST2 plan. Should funding be available, a third station in King County is acceptable; however, the quality of the stations and passenger facilities as well as the necessary mitigation for the impacts of the stations in Shoreline should not be compromised in order to fund the third station.

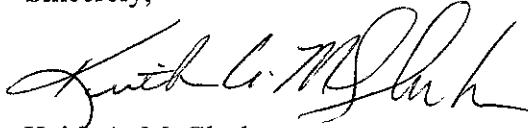
We understand that light rail passengers will travel to the station by a variety of modes – bus, bicycle, on foot and via automobile and it will be essential to accommodate them all. It is also very important that Sound Transit integrate passenger safety, comfort and convenience into the design of all facilities and transportation improvements serving the stations.

Please find enclosed a list of additional comments, issues and mitigation measures from the City of Shoreline in response to the Draft Environmental Impact Statement. The City would like Sound Transit to incorporate these into the Final Environmental Impact Statement. There are several items, specifically in regard to transportation impacts, where additional information is needed in order to accurately predict potential impacts and identify the appropriate mitigation. We anticipate that staff from both of our agencies will work to reach a resolution to these outstanding issues as part of the FEIS development and will continue to do so for other issues that arise as part of the FEIS development, system and station design and through operation of service. We trust that Sound Transit will fund the mitigation that we jointly agree are

necessary to protect the community, preserve safety and provide this much needed light rail system.

Thank you for your consideration of our comments. We look forward to continuing to work with Sound Transit on this important project. If you have any questions or need additional information, feel free to contact Alicia McIntire, Senior Transportation Planner, at 206.801.2483.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith A. McGlashan". The signature is fluid and cursive, with a large initial "K" and "M".

Keith A. McGlashan
Mayor

Enc. City of Shoreline Comments, Lynnwood Link Extension Draft
Environmental Impact Statement
April 2012 Screening Alternatives Comment Letter

CITY OF SHORELINE COMMENTS
LYNNWOOD LINK EXTENSION DRAFT ENVIRONMENTAL IMPACT STATEMENT

Transportation

General

- For each station, there will be impacts to nearby intersections and roadways that need to be mitigated. It will be Sound Transit's responsibility to fully mitigate for all transportation impacts resulting from the proposed stations. The City of Shoreline does not agree that Sound Transit will only be responsible for paying a portion of improvements at some locations. Sound Transit is responsible for all costs associated with mitigation for transportation impacts that result in failures to meet Shoreline's adopted concurrency standards. The specific improvements will be designed in coordination with the City's Transportation Planning Manager and Traffic Engineer to ensure they meet the City's design and operational standards. The City of Shoreline is currently considering the adoption of transportation impact fees and an updated concurrency methodology. Sound Transit would be subject to these regulations should they be adopted.
- All roadway improvements must be consistent with the City of Shoreline's adopted roadway standards including lane width, amenity zones, sidewalk width, bicycle facilities, stormwater management (including Low Impact Development) and parking. Improvements should be designed to minimize conflicts between nonmotorized modes (bicyclists and pedestrians) and vehicles. Roadway improvements should be extended to the nearest intersecting arterial.
- During the City's review of the traffic model developed for this project, several errors were noted. Sound Transit needs to work with City of Shoreline staff to identify and correct these errors. Additionally, it appears that the No Build scenarios developed in the model assumed significant growth and development around the stations in Shoreline. However, if light rail stations were not going to be developed in Shoreline, the growth assumptions around these stations would be significantly different, with much less growth planned in these areas. It is critical that the traffic model be accurately calibrated and coded correctly as this will influence the base level of service and model outputs. In addition to the specific transportation mitigation identified below, the corrections to the model may identify additional issues that require mitigation. Mitigation for any newly identified impacts will be discussed and agreed upon between Sound Transit and the City of Shoreline.
- The traffic analysis needs to incorporate the anticipated growth at the Point Wells site in southwest Snohomish County. This development is expected to generate approximately 11,600 daily vehicle trips by 2035 and all of these trips will travel through Shoreline, as the sole access point to the site is in Shoreline. Residents of this development that will use light rail are likely to travel to the station at NE 185th Street. If this growth was not incorporated into Sound Transit's traffic analysis, Sound Transit will need to do so. The results of this revised analysis shall be reviewed with the City of Shoreline. Mitigation for any newly identified impacts will be discussed and agreed upon between Sound Transit and the City of Shoreline.

- No mitigation is proposed in the DEIS for NE 175th Street and Meridian Avenue N, either for the temporary impacts associated with construction or for permanent impacts. During construction at NE 185th Street, particularly if the bridge is closed for 9-12 months, the City of Shoreline anticipates that there will be significant traffic diversion to NE 175th Street. These temporary impacts will require mitigation. Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation for construction. The City of Shoreline believes that permanent traffic impacts to this intersection and corridor can be attributed to the presence of the light rail stations and that Sound Transit is responsible for mitigating these impacts. This intersection may require turn pockets (WB to NB right turn). Other mitigation may be required at the intersection or along the corridor. Sound Transit needs to perform additional analysis of this intersection and corridor and work with the City of Shoreline to identify the appropriate mitigation for impacts to them.
- Cut-through traffic on non-arterial streets in the vicinity of the stations is likely. Measures that are designed to prevent or minimize this cut-through traffic will be required. The City of Shoreline has an adopted Neighborhood Traffic Safety Program which was created to respond to residents' concerns about speeding, cut-through traffic, accidents and pedestrian safety on non-arterial streets. Additionally, the City has developed Neighborhood Traffic Action Plans to improve the safety, mobility and livability of the City's neighborhoods. Sound Transit should contribute funding to the City's existing programs or set aside funding to work with the City of Shoreline once the stations are complete and service is in operation to identify and fund solutions for five years that reduce/mitigate cut-through traffic.
- Any impacts to the roadway network that modify streets need to maintain the existing street grid and not result in new dead end streets.
- Improved bus service that feeds each station will be imperative. Although the specific number of routes and frequency of service is not known at this time, the stations need to be designed to handle the maximum bus service that is forecast to serve them. Because light rail will significantly change bus service in Shoreline, a comprehensive evaluation of all transit service in the City is needed to ensure that the stations have adequate bus facilities, other facilities in the City are adequately served and that feeder service to the stations is serving all neighborhoods in Shoreline. As part of Shoreline's station area planning process this and next year, the City will prepare a Transit Integration Plan that identifies policies addressing future transit needs throughout Shoreline once light rail service begins. This process will identify levels of service and areas the City wants to see served when future service changes are implemented. This will be a coordinated process with Metro, Community Transit and Sound Transit that looks at their current policies for service distribution and redistribution of service hours in conjunction with commencement of light rail service. The expected outcome will be an agreement with Metro, Community Transit and Sound Transit on policies that will direct future transit service integration.
- Safety for all transportation modes is a critical aspect of facility design and development of appropriate mitigation. With the operation of light rail service, the volumes of pedestrian, bicycle, bus and vehicular traffic will increase significantly around the stations and along the roadways serving them. Many of these roadways currently serve several, if not all, of these

modes. As a result of the increased volumes, the conflicts between the various modes will increase significantly. For example, buses and bicycles will experience conflicts on shared roadways if buses are able to stop in a bicycle lane. Similarly, if kiss-and-ride spaces are located adjacent to bicycle lanes, there will be conflicts between bicycles and drivers as they enter and exit this area. Sound Transit needs to work with the City of Shoreline to examine the potential for conflicts between travel modes and identify the appropriate solutions to minimize conflicts and maximize safety.

- The DEIS states that potential transit priority treatments along N/NE 185th Street could be considered in the Final EIS. Sound Transit should install transit priority treatments along N/NE 185th Street as well as N/NE 145th Street, N/NE 155th Street and other primary transit corridors serving the light rail stations that are identified as part of the City's Transit Integration Plan.
- All of the alternatives will require demolition and reconstruction of the NE 195th Street pedestrian and bicycle bridge. Design and reconstruction of the bridge shall be coordinated with the City of Shoreline and should include: a minimum width of sixteen feet (eighteen feet is preferred to provide access for emergency or maintenance vehicles); improvements to the approaches that remove the bollards and improve accessibility; provide connections to 5th Avenue NE on the west side and a connection to the school through the park (within the Interstate 5 right-of-way); improved lighting, protection for users and graffiti proof materials. The bridge may be a location where Sound Transit is able to install art.
- In areas where there is connected surplus right-of-way that cannot be utilized for redevelopment purposes, separated pedestrian and bicycle facilities (such as a path adjacent to Interstate 5) should be constructed to facilitate nonmotorized travel to the stations.
- A separate Transportation Impact Analysis will be required for each station in Shoreline at the time of building permit submittal.
- The DEIS states that column locations associated with elevated alignments may constrain sight distances and that mitigation may be required for these impacts, however, no specific mitigation is proposed. The location of any columns must comply with the City's adopted standards for site distance. Column placement will be evaluated by the City during design. Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation for sight distance impacts.
- The City of Shoreline requires eight foot wide sidewalks adjacent to all uses other than single family residential and in areas where high pedestrian volumes are anticipated. This will be the case for all light rail stations and many of the pedestrian improvements that will serve the stations. Sidewalks must be separated from the travel lane by an amenity zone that is at least five feet wide.
- The construction of any improvements along the west side of Interstate 5, including parking structures and rebuilt bridges, shall not impede the potential for future construction of a southbound Interstate 5 collector-distributor lane from NE 205th Street to NE 145th Street.

NE 145th Street Station

- The City of Shoreline is currently considering annexation of 145th Street and has begun conversations with Seattle and King County regarding this possibility. Should the annexation occur and the roadway be controlled entirely by the City of Shoreline, improvements on 145th Street would be subject to Shoreline adopted roadway and intersection standards and roadway mitigation will be subject to Shoreline's adopted standards.
- The DEIS mentions the current sidewalks on NE 145th Street, however, it fails to adequately describe their very poor condition. Sidewalks on NE 145th Street that would serve the station are substandard, do not meet ADA requirements and often contain barriers to travel, such as utility poles and mailboxes. The pedestrian environment crossing the Interstate 5 overpass is also uncomfortable, with narrow sidewalks and no buffer between pedestrians and vehicles. Other nearby streets connecting to the station are also in need of new or improved sidewalks. In order to facilitate pedestrian access to this station, Sound Transit should construct the following pedestrian improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Reconstruct sidewalks on both sides of NE 145th Street from 1st Avenue NE to 8th Avenue NE to Shoreline city standards. This is a reasonable walking zone to connect nearby residents and Lakeside school attendees along a busy and severely substandard arterial street walkway to the station at NE 145th Street.
 - Improve the pedestrian environment at the Interstate 5 interchange through wider sidewalks that are separated from the travel lanes and safer crossings. This includes the pedestrian crossing at the southbound on-ramp to Interstate 5, as the City of Shoreline does not agree with the assumption that additional traffic will not affect pedestrian safety at Lakeside High School and Middle School as stated in the DEIS.
 - Construct sidewalks on 1st Avenue NE from NE 145th Street to NE 155th Street. This is a reasonable walking distance to connect nearby residents coming from west of Interstate 5.
 - Expand the width of existing sidewalks on NE 145th Street and 5th Avenue NE to eight feet along the frontage of the station as well as at nearby bus stops and from those bus stops to the nearest intersection.
 - Additional sidewalks on non-arterial streets near the station may also be required to facilitate pedestrian movement and safety.
 - Any walkways from the parking structure to the station must be safe, comfortable and provide weather protection for pedestrians.
- Bus service to the station will be critical to provide an option for those who cannot or do not wish to drive in order to access light rail. The following transit improvements are needed at this station:
 - Depending upon how buses are routed to serve the station, there need to be safe facilities for riders boarding and deboarding buses and crossing streets, where necessary. This will be of particular importance if all bus stops are located on-street rather than within the station area.

- The City supports development of a transit patron loading and unloading area that is off-street in order to minimize street crossings and maximize safety for riders, similar to what is proposed at NE 185th Street. This area needs to be adequate to provide ample space for the various routes serving it, including space for additional bus service as demand grows.
 - For safety purposes, if bus stops remain on-street the eastbound bus stop at NE 145th Street and 5th Avenue NE/Interstate 5 should be far side, not near side.
- It is unlikely that significant bicycle improvements will be installed on 145th Street in conjunction with the station development. However, bicyclists are likely to access the station via alternate routes. N/NE 155th Street will serve as the primary east-west route for bicyclists traveling to and from the station as it currently has bicycle lanes from Midvale Avenue N to 5th Avenue NE (bicycle lanes will be extended east to 15th Avenue NE by the City in 2014). Bicyclists are likely to access N/NE 155th Street and the NE 145th Street station and the station via 5th Avenue NE, 10th Avenue NE and Meridian Avenue N. In order to facilitate bicycle access to this station, Sound Transit should construct the following bicycle improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Install bicycle lanes on 5th Avenue NE from NE 145th Street to NE 185th Street. These lanes will also serve the NE 185th Street station.
 - Install bicycle lanes on Meridian Avenue N from N 145th Street to N 200th Street. These lanes will also serve the NE 185th Street station.
 - Install sharrows on 10th Avenue NE from NE 155th Street to NE 175th Street.
 - Install wayfinding signage directing bicyclists to the station along new and existing bicycle facilities. This signage shall be consistent with the City of Shoreline's wayfinding program.
 - Install facilities along new and existing bicycle routes serving the station to minimize the conflicts between bicyclists and buses, including improvements that prevent buses from blocking bicycle lanes at stops.
 - Install a separated nonmotorized trail adjacent to Interstate 5/in the Interstate 5 right-of-way from NE 145th Street to NE 155th Street.
 - The northbound Interstate 5 on-ramp is currently identified as a High Accident Location and should be signalized for vehicles and pedestrians as suggested in the DEIS.
 - The intersection/interchange and NE 145th Street, Interstate 5 and 5th Avenue NE is extremely complicated. The City of Shoreline has concerns about the traffic model results and potential mitigation for this area identified in the DEIS. For example:
 - Potential mitigation at NE 145th Street and 5th Avenue NE includes adding a protected right turn phase from northbound to eastbound traffic. The City of Shoreline disagrees that this mitigation will address the identified problem.
 - The City of Shoreline has concerns about the safety and operation of the garage entrance/exit onto 5th Avenue NE (Option 2).
- Due to the close proximity of the existing intersections, the operation of each individual intersection can impact others. The existing signals at the interchange, in addition to those proposed, need to be evaluated as part of the entire corridor/coordinated system. This

evaluation should incorporate the location of the parking garage access, off-street transit facility ingress and egress points and the northbound on-ramp. Alternate locations for the parking garage ingress/egress should be examined, including a northern location that is accessed from a roadway adjacent to the on-ramp. . All improvements at this intersection/interchange need to be evaluated simultaneously for all modes to determine the appropriate mitigation at this location. Sound Transit will need to work with the City of Shoreline to identify appropriate mitigation for this intersection.

- The potential mitigation identified in the DEIS for NE 145th Street and 12th Avenue NE includes adding a two way left turn lane/refuge area on NE 145th Street. The City of Shoreline is concerned that this improvement will encourage drivers to use 12th Avenue NE as a cut through route, particularly when 15th Avenue NE is congested. The City of Shoreline disagrees with this proposed mitigation and recommends that it not be installed. The modeling should examine the impacts on 15th Avenue NE at NE 145th Street that this removal may cause. Additional mitigation may be required for 15th Avenue NE and Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation.
- The intersection at Meridian Avenue N and NE 145th Street is a high accident location. In order to improve safety, the intersection will need improvements in the form of northbound and southbound left turn pockets and signal phasing with protected turn movements. Left turn pockets for eastbound and westbound traffic on NE 145th Street may also be required. Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation for this intersection.

NE 185th Street Station

- Sidewalks already exist in much of the area around the station location. These sidewalks need to be adequate for anticipated pedestrian volumes. In order to facilitate pedestrian access to this station, Sound Transit should construct the following sidewalk improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Expand the width of existing sidewalks on NE 185th Street to eight feet along the frontage of the station, construct eight foot wide sidewalks along the transit center frontage, at nearby bus stops and from those bus stops to the nearest intersection. Construct a plaza and sidewalks along the station frontage adjacent to the transit center.
 - Construct sidewalks on NE 180th Street from 10th Avenue NE to 15th Avenue NE and 10th Avenue NE from NE 175th Street to NE 195th Street and the NE 195th Street pedestrian/bicycle bridge. This is a reasonable walking zone to connect riders coming from North City and north and east of the station.
 - Construct sidewalks on 5th Avenue NE from NE 185th Street to NE 195th Street. This will connect riders to the Interurban-Burke Gilman Trail connector, which is expected to be a major nonmotorized route to the station. It is a reasonable walking zone to connect riders coming from the north of the station.
 - Construct sidewalks on 5th Avenue NE/7th Avenue NE from NE 175th Street to NE 185th Street. This is a reasonable walking zone to connect riders coming from south of the station.

- Additional sidewalks on non-arterial streets near the station may also be required to facilitate pedestrian movement and safety.
- Should a parking structure be located on the east side of the freeway, any walkways from the structure to the station must be safe, comfortable and provide weather protection. Should a parking lot be constructed in the Seattle City Light right-of-way, sidewalks to the station should be widened to eight feet and provide weather protection.
- The NE 185th Street bridge will need improvements for pedestrians that are safe, comfortable and provide weather protection. This may come in the form of significant improvements or reconstruction of the NE 185th Street bridge. Should the parking structure be located on the west side of the freeway, a separate pedestrian overcrossing from the parking structure across Interstate 5 to the station may be required. The bridge should provide a strong connection to the Shoreline Center. Sound Transit will need to work with the City of Shoreline to identify the appropriate design and amenities for the bridge.
- Bus service to the station will be critical to provide an option for those who cannot or do not wish to drive in order to access light rail. The following transit improvements are needed at this station:
 - The NE 185th Station is likely to serve as a transit center, with Community Transit considering termination of their Swift BRT service there. The bus facilities at this station should be off-street and need to be adequate to provide ample space for the various routes serving it, including space for additional bus service as demand grows.
 - Safe facilities for riders boarding and deboarding buses and crossing streets should also be installed.
 - Bus pullouts are needed on NE 185th Street at stops near the station to minimize conflicts with bicycles and allow traffic to pass.
- Bicycle safety: N/NE 185th Street currently has bicycle lanes from Midvale Avenue N to 1st Avenue NE (The bicycle lanes will be continued to 10th Avenue NE by the City in fall 2013) and will be the primary east-west bicycle route serving the station. NE 195th Street will be the secondary east-west bicycle route serving the station. Bicyclists are likely to access NE 185th Street and the station via 1st Avenue NE, 5th Avenue NE, 7th Avenue NE and NE 195th Street. Bicyclists coming from North City and east of the station are likely to travel on NE 180th Street, 10th Avenue NE and NE 185th Street. Improvements on these and other routes bicyclists will use to access the station should be installed. The conflicts between bicyclists and buses should also be minimized and buses cannot block bicycle lanes. In order to facilitate bicycle access to this station, Sound Transit should construct the following bicycle improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Install bicycle lanes on 5th Avenue NE from NE 145th Street to NE 185th Street. These lanes will also serve the NE 145th Street or NE 155th Street station.
 - Install bicycle lanes on Meridian Avenue N from N 145th Street to N 200th Street. These lanes will also serve NE 145th Street or NE 155th Street station.
 - Install bicycle lanes on 5th Avenue NE from NE 185th Street to NE 195th Street. These lanes will connect with the Interurban-Burke-Gilman Connector route on NE 195th Street.

- Install bicycle lanes on 1st Avenue NE from NE 185th Street to NE 195th Street. These lanes will connect with the Interurban-Burke-Gilman Connector route on NE 195th Street.
 - Install wayfinding signage directing cyclists to the station along new and existing bicycle facilities. This signage shall be consistent with the City of Shoreline's wayfinding program.
 - Install facilities along new and existing bicycle routes serving the station to minimize the conflicts between bicyclists and buses or vehicles, including improvements that prevent buses from blocking bicycle lanes at stops. Kiss-and-ride facilities should not be located adjacent to bicycle facilities.
- The northeast corner of the intersection at NE 175th Street and 5th Avenue NE has a tight turning radius, which only the shortest Metro buses can navigate. If it is anticipated that larger buses will be utilizing this intersection to serve the station at NE 185th Street, this radius will need to be improved by Sound Transit.
 - The potential improvements for 5th Avenue NE on the west side of Interstate 5 and 7th Avenue NE (5th Avenue NE on the east side) include adding a two-way left turn lane or refuge area on NE 185th Street. In addition to a turn lane/refuge area, the City of Shoreline believes a traffic signal will be needed for one or both of these intersections, depending upon the location of the parking garage, the transit center function and the realignment of 7th Avenue NE. It is likely that a signal will be needed at the transit center so that buses can exit quickly and safely. Sound Transit needs to perform additional analysis of these intersections and work with the City of Shoreline to identify the appropriate mitigation for them. Any roadway improvements will need to be in compliance with the City's road standards, including installation of bicycle and pedestrian facilities.
 - Regardless of the alternative selected, the entire roadway from 1st Avenue NE to 10th Avenue NE will need to be rechannelized with a three lane cross-section and bicycle lanes to provide for continuous lanes. This will require removal of on-street parking.
 - The analysis states that Meridian Avenue N and NE 185th Street will operate at LOS F in the No Build and all of the build options. The City of Shoreline believes that the No Build LOS F may be based on overestimated volume assumptions. The City assumed significant growth around the light rail stations as part of its traffic model provided to Sound Transit for analysis. However, if no light rail station is present, the assumptions would be very different for this area, with almost no growth planned in the vicinity. It appears Sound Transit's No Build alternative assumed the growth levels around light rail station areas in Shoreline would be the same with or without the light rail station. The City of Shoreline believes that the impacts to this intersection are significantly different under the No Build alternative and all options for this station. The City of Shoreline also believes that the proposed improvements of only adding protected-permissive phasing will not be sufficient to correct the level of service deficiencies and that the installation of northbound and southbound add/drop lanes is necessary to mitigate the impacts. Sound Transit needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it for all options.

- The DEIS identifies the need for improvements at 10th Avenue NE (add an eastbound right turn pocket) only with the parking lots, not parking garages. The City of Shoreline believes improvements will be needed at this intersection for all of the parking options at this station location. Sound Transit needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it for all options.
- A parking structure that is located on the west side of Interstate 5 could be jointly used by the Shoreline Center, particularly visitors to the Shoreline Stadium. The potential for shared use during off-peak hours should be explored to maximize the public benefit of this facility.

NE 155th Street Station

As the City of Shoreline cover letter dated September 16, 2013 states, the City strongly prefers that a light rail station be located at NE 145th Street rather than NE 155th Street. The following comments outline the City of Shoreline's concerns and mitigation requirements should a station be located at NE 155th Street. These comments should not be construed as endorsement of the proposed NE 155th Street station location.

- The pedestrian environment around the potential station at NE 155th Street requires improvements. In order to facilitate pedestrian access to this station, Sound Transit should construct the following sidewalk improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Construct improvements to the pedestrian environment on NE 155th Street under the freeway including wider sidewalks that are separated from the travel lanes and pedestrian scale lighting.
 - Expand the width of existing sidewalks on NE 155th Street to eight feet along the frontage of the station, at nearby bus stops and from those bus stops to the nearest intersection.
 - Construct sidewalks on NE 1st Avenue NE from NE 145th Street to NE 155th Street. This is a reasonable walking zone to connect nearby residents and for riders coming the south of the station.
 - Construct/install new and improved pedestrian crossings of NE 155th Street at 1st Avenue NE and at the bus stops. Sound Transit needs to work with the City to identify the appropriate design for these crossings, which may include signalization.
 - Additional sidewalks on non-arterial streets near the station may also be required to facilitate pedestrian movement and safety.
 - Any walkways from the parking structure to the station must be safe, comfortable and provide weather protection.
- Bus service to the station will be critical to provide an option for those who cannot or do not wish to drive in order to access light rail. The following transit improvements are needed at this station:
 - Depending upon how buses are routed to serve the station, there need to be safe facilities for riders boarding and deboarding buses and crossing streets, where necessary. This will be of particular importance if all bus stops are located on-street rather than within the station area.

- Develop a transit patron loading and unloading area that is off-street in order to minimize street crossings and maximize safety for riders, similar to what is proposed at NE 185th Street. This area needs to be adequate to provide ample space for the various routes serving it, including space for additional bus service as demand grows.
 - Bus pullouts are needed on NE 155th Street at stops near the station to minimize conflicts with bicycles and allow traffic to pass.
- N/NE 155th Street currently has bicycle lanes from Midvale Avenue N to 5th Avenue NE (bicycle lanes will be extended east to 15th Avenue NE by the City in 2014) and will be the primary east-west bicycle route serving the station. Bicyclists are likely to access NE 155th Street and the station via 5th Avenue NE, 10th Avenue NE and Meridian Avenue N. In order to facilitate bicycle access to this station, Sound Transit should construct the following bicycle improvements. These improvements are consistent with the City of Shoreline's adopted Transportation Master Plan.
 - Install bicycle lanes on 5th Avenue NE from NE 145th Street to NE 185th Street. These lanes will also serve the NE 185th Street station.
 - Install bicycle lanes on Meridian Avenue N from N 145th Street to N 200th Street. These lanes will also serve the NE 185th Street station.
 - Install sharrows on 10th Avenue NE from NE 155th Street to NE 175th Street.
 - Install bicycle facilities on 1st Avenue NE from NE 145th Street to NE 155th Street. The City's Transportation Master Plan did not anticipate the need for bicycle facilities on this street, as it was assumed that a light rail station would be located at NE 145th Street rather than NE 155th Street. Sound Transit needs to work with the City of Shoreline to identify the appropriate bicycle facilities for this roadway.
 - Install wayfinding signage directing cyclists to the station along new and existing bicycle facilities. This signage shall be consistent with the City of Shoreline's wayfinding program.
- Install facilities along new and existing bicycle routes serving the station to minimize the conflicts between bicyclists and buses, including improvements that prevent buses from blocking bicycle lanes at stops.
- The City of Shoreline agrees that the eastbound right turn lane at Aurora Avenue N and N 155th Street may need to be changed to a shared through/right-turn lane as suggested in the DEIS. Sound Transit needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it.
- Potential mitigation at NE 155th Street and 1st Avenue NE includes adding a right turn pocket. The City of Shoreline disagrees that this mitigation will address the identified problem and believes this intersection will require signalization. Sound Transit needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it.
- Potential mitigation at NE 165th Street and 5th Avenue NE includes adding a second northbound through lane on 5th Avenue NE. The City of Shoreline disagrees that this mitigation will address the identified problem and believes this intersection may require signalization. Sound Transit

needs to perform additional analysis of this intersection and work with the City of Shoreline to identify the appropriate mitigation for it.

- Provide a correction in the FEIS that there is only one option remaining for paratransit and passenger pick up/drop off locations and that it is off street.

Parking

- The parking analysis evaluated utilization between 9 am and 11 am and 1 pm and 4 pm. While it is likely that cars will be parked there during those times, drivers that will park in the neighborhoods are likely to arrive earlier and leave later, when local residents still have vehicles parked on street or are returning home. Thus, Sound Transit did not evaluate the worst case scenario for parking impacts. The City of Shoreline is uncertain that the potential for spillover parking is low simply because a large garage is planned as stated in the DEIS, as this does not seem consistent with Sound Transit's experience elsewhere. The DEIS states "For parking controls agreed to with the local jurisdiction, Sound Transit would be responsible for the cost of installing the signage or other parking controls for 1 year after opening the light rail system. The local jurisdictions would be responsible for monitoring the parking controls and providing all enforcement and maintenance". The City of Shoreline does not agree with this mitigation. Sound Transit should set aside funding to work with the City of Shoreline once the stations are complete and service is in operation to identify and fund solutions that reduce/mitigate spillover parking. This may include funding the establishment and enforcement of a residential parking zone for five years. Sound Transit could also consider utilizing parking revenues to fund parking management/enforcement in Shoreline.

Land Use

- When describing the City of Shoreline's Comprehensive Plan Land Use Policies, the DEIS states "The land use policies would further guide land use regulations for station areas at NE 145th and NE 185th streets, including transit-supportive developments with residential components mixed with complementary commercial and office uses". Please note that the City's policies will recommend high-density residential in the station areas around NE 145th Street and NE 185th Street as part of transit-supportive developments.
- As part of its light rail station subarea planning process, the City of Shoreline will explore the creation of development regulations addressing the location of commercial/retail uses as part of parking structures. Sound Transit is subject to the City's land use regulations when developing the light rail stations and associated facilities.

Visual and Aesthetic Resources

- Removal of significant trees is regulated by and may be partly mitigated by replacement as prescribed in the Shoreline Municipal Code. Mitigation for the visual impacts associated with tree removal should include replacement with larger sized trees. Sound Transit should plant replacement vegetation as early as possible to help minimize visual impacts. This may include installation of replacement vegetation outside of disturbance areas prior to construction.

- It will be important to coordinate with the City regarding station design. The design must comply with the City's commercial, station area or other applicable design standards, depending on the ultimate zoning of the station sites. Other potential mitigation for visual impact would be to use 1% for art on areas that have a high visual impact and low potential for screening.

Noise and Vibration

- Noise walls should be relocated and/or constructed as early as possible to help minimize noise impacts associated with construction.
- Sound Transit should work with property owners both during the design and construction phases to ensure all noise and vibration impacts have been properly mitigated. Once the project is completed and service is operational, Sound Transit should continue to work with property owners to ensure all noise and vibration impacts have been mitigated.

Ecosystem Resources

- Mitigation for wetland impacts shall be as described in Shoreline Municipal Code, including replacement at the ratio described in the code and no net loss of function and value of wetland resources.

Water Resources

- Page I-4.9-7 (Appendix I) lists the stormwater design manuals for jurisdictions in which construction will occur. While these are the current requirements, the National Pollutant Discharge Elimination System Phase II permit will require all jurisdictions to adopt the 2012 Stormwater Manual or equivalent by end of 2016. The stormwater design manuals in some of the jurisdictions are likely to change with the adoption of new requirements.
- All construction and improvements must comply with the City's adopted regulations for stormwater management, including Low Impact Development.

Geology and Soils

- Figure I-4.11-2b does not identify peat located near Ronald Bog located at NE 175th Street and Meridian Avenue N, just west of Interstate 5. It is known that peat exists in this area, however, it is unknown the extent and/or if it extends east of Interstate 5. The area under Interstate 5 was a wetland prior to construction. Since peat is not shown where it is known to exist, soil conditions should be verified in the area east of Interstate 5 where support may be needed. Sound Transit should conduct additional borings in that area to confirm conditions.

Public Services, Safety and Security

- The proposed light rail station at NE 155th Street places the fire station between the light rail station and the parking facility. This location and layout will interfere with the existing Fire

Station just east of Interstate 5 due to increased bus, vehicle, pedestrian and bicycle traffic generated by the light rail station, thereby negatively impacting emergency response times. Depending on the specific design of the rail line itself and/or the station and the subsequent increase in traffic, the fire department may have to consider moving the facility all together. Sound Transit shall work with the Shoreline Fire Department to ensure emergency service functions and operations can continue during construction and with operation of the light rail station or relocate the fire station.

- In addition to other public safety providers, Sound Transit Police will also have jurisdiction at the light rail stations, which will influence response times. The impacts of this coordination and strategies to reduce redundancies between providers should be described in the FEIS.
- The majority of existing open-air (non-tunnel) Sound Transit stations do not have security personnel physically present as a deterrent. Many stations are monitored via camera by security personnel, who then have to report activity via phone and radio, creating ineffective prevention and response. At minimum, the physical presence of security personnel actively patrolling the facilities and buses serving the stations, combined with CCTV active monitoring, are necessary for prevention and timely reporting. Security shall be funded by Sound Transit.
- Safety and security needs to be fully integrated with design of the stations, parking structures and other facilities. Design of facilities shall be coordinated with the City of Shoreline Police Department. Safety issues that need to be addressed include:
 - Integration of Crime Prevention Through Environmental Design (CPTED) into all facilities.
 - Elevated platform emergency response requires more planning and redundant design features due to choke points inherent to mass movement to the boarding platform.
 - Sound Transit should consider developing City of Shoreline stations as closed system design, requiring pay at surface/grade level in order to enter areas for ridership flow and access to light rail vehicles.
 - Guideways will need significant passive barriers that prevent access to elevated, as well as at grade, locations not intended for rider use. Barriers should be integrated into overall security and CPTED design, as it would serve as a deterrent to theft and vandalism.

Utilities

- The DEIS identifies a 24-inch diameter water line crossing at NE 185th Street (this is incorrectly identified as a Shoreline Water District water line; it is a Seattle Public Utilities water line). Any modifications to or replacement of the NE 185th Street bridge must be sure not to impact this line or disrupt service to customers. This water line may need to be replaced. The City of Shoreline is in the process of acquiring the Seattle Public Utilities water utility located within the city limits and anticipates ownership will be completed by 2020. All design and construction discussions about impacts to this and other Seattle Public Utilities water utility facilities located within the City of Shoreline shall include Shoreline staff prior to and after the acquisition is complete.

- As part of the City of Shoreline's acquisition of the portion of the Seattle Public Utilities water system located within Shoreline, the City is required to separate the system including installation of a new trunk line in the N/NE 145th Street right-of-way. This construction work is likely to occur from 2018-2020, at which time construction on the Lynnwood Link Extension will be underway. As design progresses for both projects, Sound Transit and the City of Shoreline will need to coordinate water line construction schedules to determine the best course of action to minimize disruption to residents and users of the corridor. Opportunities for construction efficiencies should also be explored.

Parks and Recreational Resources/4(f) and 6(f) Evaluation

- Construction will impact Ridgecrest Park as well as access to the park. The DEIS includes a general list of construction mitigation options and states that Sound Transit will work with jurisdictions to develop appropriate construction mitigation. As design progresses and construction plans are developed, the City will work with Sound Transit to identify mitigation to minimize construction impacts to park users and plans for restoration of disturbed areas.
- Ridgecrest Park was originally purchased by King County with Forward Thrust funding. In accordance with the requirements of Forward Thrust, any park land acquired must be replaced with like property. It will be Sound Transit's responsibility to coordinate with King County to prepare the land conversion process with like property. The conversion has to be approved by King County before the City of Shoreline can authorize purchase of the property for the Lynnwood Link Extension. Sound Transit will need to work with the City's Parks Department to identify the appropriate location and type of mitigation for this acquisition.

Construction

- Should the NE 185th Street bridge need to be reconstructed, the DEIS states that the roadway may need to be closed for 9-12 months. A closure of this magnitude will have significant impacts to the community. It will eliminate a major east-west access roadway and result in additional congestion at NE 175th Street, as drivers utilize this roadway as a substitute. Shoreline has a strong preference against full closure of this key arterial corridor and will require Sound Transit to develop options to avoid one, such as a temporary bridge or a half closure. The DEIS does not identify how other roadways, such as NE 175th Street, will be impacted if the NE 185th Street bridge is closed. There is no discussion of any impacts, suggested detours or mitigation. Sound Transit should explore alternative construction methods that do not require a full closure of the roadway should this bridge need to be reconstructed. Sound Transit will need to work with the City of Shoreline to identify the appropriate mitigation for these construction impacts.
- Reconstruction or improvements to the NE 185th Street bridge will need to be staggered with reconstruction of the NE 195th Street bridge so that at least one bridge is usable for bicyclists and pedestrians at all times.
- Shoreline will want to be involved in the early development of construction plans for this project. Coordination between Shoreline, Sound Transit and other agencies will include issues such as phasing and timing for various stages of construction, rerouting of bus service, impacts

to Ridgecrest Park, utility relocations including the City's waterline separation work at N/NE 145th Street, night work, truck/haul routes, detour routes, hazardous materials response planning and inspection coordination.

- The review of plans and construction management for this project will result in a significant work load for the City of Shoreline employees. Sound Transit will need to provide funding to the City to pay for additional human resources tasked with design and construction related review of the project.
- Mitigation is required to ensure that bus service is minimally interrupted during construction. Because the North Jackson Park park and ride facility at NE 145th Street and 5th Avenue NE will be used for construction staging, an alternative, temporary park and ride facility(ies) shall be sited and signed in the vicinity for routes that serve it. The existing transit only off ramps should remain in operation until light rail service begins and bus service is permanently rerouted.
- When access to properties is impacted, it should be partial only. Sound Transit shall maintain access to all properties during construction unless an alternative is mutually agreed upon by Sound Transit and the property owner. Exceptions may include short duration full closures for tasks such as paving and pouring and curing concrete.
- Noise from construction, including night work, must be mitigated to the fullest extent possible.
- Construction equipment has the potential to impact the condition of roadways that are part of haul routes. An assessment of the pavement condition for roads serving the station should be performed by Sound Transit and approved by the City before and after construction to help document any damage that occurs during construction. Damage to roadways resulting from construction activities must be repaired by Sound Transit.
- Measures should be taken during construction to avoid any short term impacts to Thornton Creek. Appropriate Best Management Practices shall be implemented and monitored during construction to avoid impacts to water quality.