



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

August 12, 2013

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JW

Mr. Kenneth Feldman
Deputy Regional Administrator
Federal Transit Administration
915 Second Ave., Suite 3142
Seattle, WA 98174-1002

In future correspondence please refer to:

Log: 100611-07-FTA
Property: Sound Transit's Lynnwood Link Extension Light Rail Project
Re: Receipt of Draft Environmental Impact Statement, No Adverse Effect

Dear Mr. Feldman:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The Lynnwood Link Extension Light Rail project has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

S-001-001

Thank you for submitting the draft Environmental Impact Statement Summary. We have reviewed the document and concur with your preliminary finding that the project, as described, will have no adverse effect on historic properties and/or archaeological sites within the area of potential effects identified for the project.

If additional information on the project becomes available, construction plans are altered, or if any archaeological resources are uncovered during construction, please halt work in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. If you have any questions, please contact me.

Sincerely,

Matthew Sterner, M.A.
Transportation Archaeologist
(360) 586-3082
matthew.sterner@dahp.wa.gov

AUG 15 2013 11:57

State of Washington • Department of Archaeology & Historic Preservation
P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 586-3065
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S-001-001

Thank you for your letter. Sound Transit has appreciated the collaborative communication and coordination with DAHP during the Lynnwood Link Extension EIS and Section 106 reviews.

September 10, 2013

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

To the Sound Transit Board:

S-002-001

We are writing to express our concern for the future of the Latvian Community Center, located at 17710 - 3rd Avenue Northeast. As you know, the Center's activities will be affected by the light rail extension that is planned along Interstate 5.

The University of Washington's Department of Scandinavian Studies maintains close ties to Seattle's Latvian, Estonian, and Lithuanian communities, who all organize many events at the Latvian Center. Students and instructors in UW's international studies programs attend concerts, lectures, films, and theater performances, to learn about these countries and their people. Student tickets and parking are inexpensive (much cheaper than flying to the countries!), because the Center is owned by the Latvian community. The Scandinavian Department's Baltic Studies Program is the only program in the United States to teach Estonian, Latvian, and Lithuanian, three languages that are often spoken at Latvian Center events where UW's foreign language students can practice their language skills.

The UW Scandinavian Department also organizes events at the Latvian Center. The Center's central location, parking lot, and kitchen facilities make it an ideal place for community outreach activities such as our annual "Baltic Saint Martin's Day" celebration, lectures, and other events that UW co-hosts with community organizations.


For the next few years, construction of the light rail line will disrupt these educational events for our students and faculty, as well as UW community outreach opportunities at the Latvian Center. We hope that when construction is finished, the Latvian Center will be able to continue hosting the vibrant cultural life that enriches the education of our students and teachers and off-campus communities.

We hope that representatives of Sound Transit will be able to attend the UW Baltic Program's "Martin's Day" celebration on October 26, 2013, to see for themselves that the Latvian Center is an incredible gift to the Seattle community. We hope that Sound Transit will take every possible step to ensure that the Center can continue its activities during and after light rail construction.

Please contact the Department of Scandinavian Studies if further information is needed.

Sincerely,


Jan Sjävik, Chair


Guntis Šmidchens, Associate Professor

UW Department of Scandinavian Studies, 206-543-0645; uwscand@uw.edu

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S-002-001

Thank you for describing the linkage between the University of Washington's Department of Scandinavian Studies and the Seattle Latvian Evangelical Lutheran Church. Following the Draft EIS, the Sound Transit Board directed Sound Transit to develop a Preferred Alternative that would avoid displacing the church. The Final EIS describes the additional engineering Sound Transit undertook to realign 3rd Avenue NE and avoid the potential displacement of the church. As a result, none of the Segment A alternatives evaluated in the Final EIS would displace the church or the church hall.

Although construction activities will be adjacent to the church, Sound Transit will work closely with the church to maintain access, minimize parking loss, and reduce other potential construction disruptions to ongoing church and center activities. The primary construction in the area would be ongoing for 1-2 years in the area, but major construction activities would be shorter duration. For temporary impacts such as truck traffic, detours, noise, dust, light and glare, Sound Transit proposes best management practices to avoid and minimize impacts in Sections 3.6, 4.5.7, 4.6.7, and 4.7.7. The construction area would also be fenced to protect public safety, and the church would have a direct contact at Sound Transit to discuss any issues of concern.



Lynn Peterson
Secretary of Transportation
September 23, 2013

Northwest Region
15700 Dayton Avenue North
P.O. Box 330310
Seattle, WA 98133-9710
206-440-4000
TTY: 1-800-833-6388
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Joni Earl
Sound Transit
Union Station
401 S. Jackson Street
Seattle, WA 98104-2826

Dear Joni:

S-003-001

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Lynnwood Link Extension we received on July 18, 2013. The Washington State Department of Transportation (WSDOT) strongly supports the extension of light rail to Lynnwood. As we work with our partners to develop an integrated transportation system for the 21st century, it is important to provide multiple mode choices to people trying to reach destinations in congested travel corridors like Interstate 5 (I-5). The Lynnwood Link Extension project will add much-needed capacity for moving people in the I-5 corridor and ultimately allow the entire transportation system to function better.

WSDOT has been working closely with Sound Transit on the development of the light rail extension to Lynnwood. As a result of our close coordination, we consider all of the alternatives being evaluated for this project to be viable choices and do not have a preference. We look forward to continuing to collaborate with Sound Transit on the design of the project after a Preferred Alternative is identified.

As we work together during final design, WSDOT will be focused on maintaining safety and also on ensuring that the project effectively blends into the overall transportation system. In particular, optimizing access to stations through improvements to non-motorized transportation modes is a high priority to us. We are confident that we will be able to work with Sound Transit and local jurisdictions to develop effective solutions.

Overall, we feel that the Draft EIS was thorough and well done. After conducting a review, we think there are a few areas that should be improved as the Final EIS is developed. The points we'd like to highlight are identified below. We will be sending detailed comments separately.

S-003-002

Transportation

Keeping WSDOT freeway management infrastructure on I-5 operational throughout construction is very important. This includes ensuring the closed-circuit television system, variable message signs, data stations, and ramp meters stay operational, with

S-003-001

Thank you for your efforts in working on the initial development of the Lynnwood Link Extension and for WSDOT's support for the project.

S-003-002

Sound Transit assumes that the I-5 freeway management systems will need to be operational through construction in order to help ease impacts of the construction. The Final EIS clarifies this assumption in Chapter 3, Transportation, Section 3.3. Sound Transit will continue to coordinate with WSDOT to develop a detailed approach.

Joni Earl
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S-003-002

reconfiguration as needed. A commitment to do this is in the Transportation Technical Report, but it should be among the mitigation commitments in the Final EIS and ultimately the Record of Decision.

S-003-003

Visual Resources

The analysis of visual and aesthetic resources is improved since our previous review, but we have identified further changes that should be made in the Final EIS to provide the robust analysis needed for the project. These changes are enumerated in the detailed comments we are providing. In general, we think that the degree of change to visual resources is understated for a number of locations and the analysis would benefit from greater clarity. However, this does not change the overall conclusion in the Draft EIS that virtually all of the alternative in each segment of the project will have some high impacts to visual resources.

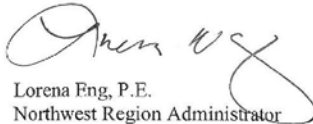
Regarding mitigation for visual resources, we appreciate that Sound Transit acknowledges the need to mitigate for impacts to areas acquired under the Highway Beautification Act of 1965 with replacement land. However, the Final EIS should also note that Sound Transit will be required to mitigate for the loss of vegetation within WSDOT right of way per our roadside policies. We would like the loss of vegetation, particularly the large trees, minimized as much as practicable.

We look forward to working with Sound Transit on the final design and implementation of this important project. Thank you again for the opportunity to review and comment on the Draft EIS.

Sincerely,



Brian Lagerberg
Public Transportation Director



Lorena Eng, P.E.
Northwest Region Administrator
Washington State Department of Transportation

cc: Lauren Swift, Sound Transit

S-003-003

Section 4.5 of the Final EIS includes revisions and clarifications to the assessment of visual impacts based on specific comments by WSDOT.

The Final EIS also provides updated discussion about Sound Transit's approaches to minimize the loss of vegetation, particularly large trees, to the extent feasible, with details to be defined during final design in consultation with WSDOT. Sound Transit understands the necessity to mitigate loss of vegetation consistent with WSDOT roadside policies and to mitigate impacts to areas acquired under the Highway Beautification Act. Sound Transit will work with WSDOT to accomplish this.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

September 23, 2013

Lauren Swift, Environmental Planner
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

RE: Lynnwood Link Extension Draft Environmental Impact Statement

Sent via e-mail

Dear Ms. Swift:

I would like to thank you for providing the Department of Ecology (Ecology) an opportunity to comment on the Lynnwood Link Extension Draft Environmental Impact Statement (DEIS). The Lynnwood Link Extension would extend light rail service from north Seattle to Lynnwood in Snohomish County. Ecology offers the following comments for the record as Sound Transit moves forward with planning for this project, which has the potential to significantly reduce traffic congestion and improve options for commuters.

S-004-001 | The DEIS is a well-written and comprehensive review of the potential environmental impacts of the project. For consistency with the State Environmental Policy Act implementing rules (WAC 197-11-768) and state and federal standards in reviewing potential wetland impacts, avoidance and minimization are the first two steps in assessing potential impacts. Therefore, Ecology supports the alternatives that avoid and minimize impacts to wetlands and streams in the project corridor. While we realize this is a linear transportation project in a densely urban area, the Scriber Creek wetland complex (Wetland WLY4), the largest and highest functioning wetland in the project corridor, still provides some important habitat and stream support. There are options described in the DEIS that reduce potential impacts to this ecologically valuable resource. Ecology supports Alternatives C1 or C3 due to the reduced impacts to Wetland WLY4.

S-004-002 | As the project design progresses, the wetlands potentially impacted by project construction will need to be delineated and rated, consistent with the current state and federal delineation and rating standards. The wetland boundaries and ratings will need to be field verified by agency staff. As described in the DEIS, it appears that the proposed wetland fill will require individual Water Quality Certification (WQC) from Ecology. To avoid delays in project review and approval, we would recommend that applications be submitted to Ecology and the U.S. Army Corps of Engineers early in design process once the final alignment is selected. Ecology

S-004-001

The Preferred Alternative is a modified C3, which has slightly more impacts to wetlands, but also better balances other impacts and benefits. This project will abide by all applicable federal, state, and local environmental laws and regulations. Sound Transit's policy 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 Lynnwood Link Extension would mitigate impacts on ecosystem resources in accordance with the mitigation sequencing requirements established by NEPA, SEPA, the Clean Water Act, and local critical areas ordinances. The Preferred Alternative design in the Final EIS has an alignment as well as structural and construction elements that help avoid and minimize impacts; the Final EIS also describes other mitigation that would be further defined during final design and permitting, including seeking mitigation opportunities within the Scriber Creek wetland complex.

S-004-002

All wetlands that may be affected by the Preferred Alternative will be delineated consistent with state and federal delineation standards, and wetland ratings will be updated as needed. Sound Transit will coordinate with regulatory agencies during permitting. Thank you for your offer of assistance during the application process.

Lauren Swift
RE: Lynnwood Link Extension DEIS
September 23, 2013
Page 2

S-004-002 staff would be happy to assist Sound Transit should you have any questions on the state application and approval process.

Specific comments on the DEIS include the following:

S-004-003 § 4.8.2, p. 4-135 The DEIS indicates that the Scriber Creek ordinary high water mark (OHWM) was not discernible within the Scriber Creek wetland complex. In these situations the OHWM is often located at the outer channels during ordinary high flow events. Ecology would be happy to assist Sound Transit in refining the OHWM for the final environmental impact statement (FEIS).

S-004-004 Also on p. 4-135, DEIS states that stormwater flow control and treatment will comply with all local stormwater standards but that project may result in increased flows or duration of stormwater input to receiving waters. As mentioned, the proposed wetland impacts listed in the DEIS will require state authorization and likely an individual WQC. As part of the WQC approval, the project will need to be designed to meet the current state stormwater manual and consistent with the stormwater treatment and flow control standards for discharges to waters of the state, including wetlands.

S-004-005 § 4.8.6, p. 4-146 The section discussing compensatory mitigation mentions the possible use of available approved mitigation banks as a mitigation option. There are currently no approved wetland mitigation banks within the project area.

S-004-006 § 4.8.6, p. 4-147 The possibility of onsite mitigation within the Scriber Creek wetland complex (Wetland WLY4) is mentioned. Ecology would support a consolidated mitigation approach at this site due to the potential benefit to Scriber Creek and salmonids. The mitigation site will need to have adequate buffers and long-term protection consistent with state and federal guidance.

S-004-007 § 4.9, p. 4-151 Relative to management under the state Shoreline Management Act (RCW 90.58; SMA), the DEIS states that Ecology has delegated authority to regulate designated shorelines to the local jurisdictions. As a point of clarification, Ecology is the state agency that jointly administers the SMA along with the local jurisdictions. Ballinger Lake is apparently the only shoreline within the project area, but lakes are the only shoreline waters that need to be formally designated within the local jurisdiction's Shoreline Master Program. All other shoreline waters (tidal waters and streams with a mean annual flow greater than 20 cubic feet/second) and associated wetlands are under SMA jurisdiction whether or not they have been formally designated.

We look forward to continuing to work with Sound Transit on this important transportation project and to reviewing the FEIS. We would be happy to assist Sound Transit in any way that we can during the design and permitting of the Lynnwood Link Extension. If you have any questions or would like to discuss my comments, please give me a call at (425) 649 7148 or send an email to paan461@ecy.wa.gov.

S-004-003

Thank you for the offer to assist with the OHWM determination for Scriber Creek in the wetland complex.

S-004-004

Thank you for your comment. Sound Transit will comply with all applicable certifications and design standards, including Clean Water Act Section 401 Water Quality Certification and the Washington State Department of Ecology (Ecology) Stormwater Manual for Western Washington.

S-004-005

It is correct that there are no approved mitigation banks with service areas in the project area. The referenced statement is included to not preclude the opportunity to use any future mitigation banks that may have a service area within the project area.

S-004-006

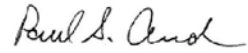
If project-specific mitigation is developed for this project, site selection would emphasize a watershed approach to consolidate compensatory mitigation sites. Plans would be developed in cooperation with resource agencies.

S-004-007

Thank you for your comment. The text of the Final EIS has been updated to clarify the roles of Ecology and the City of Mountlake Terrace with regard to Lake Ballinger shoreline regulation.

Lauren Swift
RE: Lynnwood Link Extension DEIS
September 23, 2013
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Sincerely,

A handwritten signature in cursive script that reads "Paul S. Anderson".

Paul S. Anderson, PWS
Wetland Specialist
Shorelands and Environmental Assistance Program

E-cc: Rebekah Padgett, Department of Ecology
Matthew Bennett, U.S. Army Corps of Engineers Seattle District Office