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June 26, 2017

Ahmad Fazel
Executive Director, DECM
Sound Transit
401 S. Jackson Street
Seattle, WA 98104-2826

RE: City of Shoreline 60% Open House Comments

Dear Mr. Fazel:

The City of Shoreline would like to take this opportunity to convey to Sound Transit our comments in response to the 60% Open House for the Lynnwood Link Extension light rail facilities within the City of Shoreline. We appreciate the continued work and partnership that is going into designing the project and developing solutions that are mutually beneficial to the City and Sound Transit. The City believes that public input at this phase is extremely important, as it will inform both the project refinements for Sound Transit's baseline process and the City's review of major land use permits for the project. At this time, the project should generally be consistent with the City's Guiding Principles for Light Rail Facility Design (Guiding Principles – as adopted February 2016). The project should also adequately incorporate mitigation for direct impacts required by adopted codes or through the Federal Transit Agency's Lynnwood Link Extension Record of Decision under the National Environmental Policy Act.

Our 60% design comments illustrate the project's consistency, or lack thereof, with the Multi-modal Access, Neighborhood Character, Sustainability, Public Safety, Mobility, Public Amenities, Transit Oriented Development, and Public Art provisions in the Guiding Principles. This comment letter also addresses the City's concerns over mitigation elements that are still missing from the 60% project package and the Special Use Permit application submitted in May.

Excellent progress has been made towards incorporating these guiding principles in the project. However, there are still some Guiding Principles that are not adequately incorporated into the project.

Multi-modal – stations should be full-service transit hubs and provide great access and inviting and convenient connections for trains, buses, bikes, and pedestrians

The 60% station designs are clearly full-service transit hubs and provide excellent connections for trains and busses. The need for safe and effective multi-modal access to the stations is the primary concern that the City Council has for this light rail project. The current design does not go far enough to make sure that people can safely walk or safely ride to the stations. While the interior of the stations accommodate multiple modes of arrival and departure, in order to make the stations work for our neighborhoods, people need to be able to walk or bike there safely to access the station and the design currently falls short on that. The City's focus is making sure people can use the light rail system, and part of being able to use the system is being able to access the stations.

We understand that Sound Transit has been working with City staff to develop project elements that will provide inviting and convenient connections for bikes and pedestrians, but that agreement has not yet been reached and those non-motorized connection solutions are not incorporated. In particular, the 60% open house plans do not adequately reflect:

- Coordination with the City on the future landing location of the proposed 148th non-motorized I-5 crossing;
- Detailed design for pedestrian and bicycle connections across I-5 on the 185th Street Bridge between the station and garage;
- Essential shared-use path connections into both station areas from the neighborhoods to the north of each station that would be incorporated into to the City's future Trail Along the Rail project (connections to the south of the stations are in the design); and
- No space has been identified in the station areas for future bike-sharing facilities or car-sharing programs.

Sound Transit has not yet submitted a Multi-modal Access mitigation plan that addresses how Sound Transit will fund and/or construct its proportional share of infrastructure improvements needed to safely support the light rail transit system development. This plan is required for the Special Use Permit application to be considered complete. The City looks forward to reviewing that information and coming to agreement with Sound Transit on how to best meet the needs for improvements to multi-modal access infrastructure to support safe transit user access to the stations and what Sound Transit's proportionate share of those improvements would be.

Wayfinding sign plans are not yet developed in enough detail to determine if the pedestrian pathways to and through the stations are well marked. The City looks forward to reviewing this at the 90% design milestone.

We appreciate Sound Transit's coordination with the City on our 145th Interchange project and willingness to adjust design so that the non-motorized bridge can potentially be connected to the station through a future plaza path crossing diagonally from the 145th Street Bridge to the southeast corner of the station site.

Neighborhood Character – stations should connect to the surrounding community to encourage and enhance vibrant place-making

The 60% Open House plans for the stations are beginning to include elements of neighborhood character and place-making with the use of a tree-based theme and the inclusion of other design details. We also understand that Sound Transit is working with City staff to revise the stations designs to accommodate both public gathering places and potential trail connections to the adjacent neighborhoods, though agreement has not yet been reached. Place-making and neighborhood character elements that are still in progress or require additional work include:

- Redesigning the Kiss & Ride area at the 145th station so it can double as a public gathering space during off-peak times;
- Expanding the pedestrian area at the north end of the 185th station to provide both a small public gathering space and connection to the shared-use path route from the north side of the station. This feature fulfills the public gathering space element when combined with the proposed open lawn areas east of the transit center;
- Garage facade and noise wall treatments are not yet sufficiently advanced for the City to determine if the design is conveying a sense of place. There are elements that do embrace this guiding principle such as the green living wall proposed as part of the stormwater art by Buster Simpson and the tree ring cellular pattern design of the 145th Garage. The City expects that the form liner pattern(s) for noise and screening walls throughout the project alignment, the design of the 185th garage, and the currently blank south facade of the 145th Garage will be adjusted to similarly use design to convey a sense of place and neighborhood character;
- The City appreciates Sound Transit's responsiveness to comments on the station colors received at the open house and looks forward to selection of new colors to be made in coordination with the City;
- Pedestrian scale lighting plans are still being developed and will be reviewed by the City staff between now and 90% design for consistency with the guiding principles;
- The current station landscape designs do not yet go very far in embracing Shoreline's commitment to green space and sustainability, such as incorporation of stormwater management into the landscaping and/or landscaping that requires little to no long term irrigation. The City hopes that adjustments can be made towards using more native landscaping and incorporation of stormwater management into the landscaping at both stations by the 90% design; and
- City staff has indicated that discussions are underway regarding details to accommodate the City's future Trail Along the Rail in the areas that Sound Transit is acquiring for this light rail project. Council looks forward to reviewing potential easements as part of the street vacation process that is required for this project.

Sustainability – all Sound Transit development should consider sustainable and climate friendly practices

Of course, the Lynnwood Link project as a whole creates an extremely sustainable alternative to reliance upon highly inefficient single occupancy vehicles. The next biggest contribution of

the light rail station designs to sustainable and climate-friendly practices is traffic signal priority for transit in and out of the stations.

The City understands that Sound Transit, as standard practice, endeavors to use many sustainable strategies in station design and at the Shoreline stations, including:

- Provision of carpool, electric vehicle, and car sharing parking spaces;
- Use of daylighting to meet lighting requirements;
- Use of extra insulation, energy efficient lighting, and natural ventilation to reduce energy demands of the stations and garages;
- Provision of bike parking facilities at stations, with room for future expansion;
- Specification of durable materials to reduce frequency of repair and replacement in facilities;
- Native and adaptive plant landscaping with emphasis on drought-tolerant plants to reduce water use;
- Use of a Volatile Organic Compound (VOC) budgeting approach to reduce VOC emitting materials, where possible to balance with materials that do not have low VOC options;
- Low Impact Development methods for stormwater management used where soil conditions and the seasonal water table allow, however much of the project alignment is in areas of soils with low infiltration rates;
- Recycling, reusing, or repurposing demolition and construction waste, salvaging landscape materials prior to demolition and incorporating materials made from salvaged, renewable, recycle, and/or regional materials within the project;
- Water efficient fixtures and practices including plumbing fixtures and landscape irrigation systems; and
- Incorporation of a variety of sustainable construction practices into the construction specifications and management planning.

Additionally, Sound Transit's proposed off-site wetland mitigation project to be constructed at Ronald Bog does an excellent job of meeting the City code requirements for locating mitigation within the affected basin when onsite mitigation of unavoidable impacts is not possible. We appreciate that the project proposed at Ronald Bog aims to meet local, state, and federal requirements and that no mitigation of the impacts within the City is proposed to be located outside the impacted basin or outside Shoreline. The proposed interpretive signage and trail improvements for this project will enhance the public experience in the park in conjunction with the habitat and environmental services being replaced with this project.

The City has not yet received the 60% Sustainability Report for this project. At this point it is unclear what green building or sustainable design elements will be incorporated into the project and whether it is similar to a LEED building standard, Salmon Safe Sites standard, or similar. The project does not yet have any photovoltaic solar panels proposed for installation at either station or parking garages. At 60%, the station and garage designs do not yet meet Washington state energy code standards, let alone exceeding those standards. Similarly, due to the grades needed for the stations and transit areas, almost no tree preservation is possible within the station areas. We understand that Sound Transit has worked with WSDOT to reduce the

numbers of trees to be removed within the WSDOT corridor along the guideway alignment. Overall, it is anticipated that the project will be able meet the City's adopted tree replacement standards for the approximately 900 significant trees to be removed within the City of Shoreline.

The City supports Sound Transit's previous commitments to design a light rail system in Shoreline that is equivalent to LEED Silver, understanding that certification is not viable because there are no permanently occupied spaces in these facilities. Sound Transit could also consider designing and certifying the station areas to be Salmon Safe.

Public Safety – *the facilities should be safe, welcoming areas for people of all ages at all times through measures*

At 60% design, the City is generally satisfied with how public safety is being addressed in the project design. The City understands that Crime Prevention through Environmental Design (CPTED) is actively being integrated through the station and garage design process. The station designs do an excellent job of using glazing to create open and transparent stations. We expect to see at the 90% design milestone, further development of the plan for security cameras (monitored), emergency call-boxes, pedestrian lighting, and other necessary design elements to ensure safe, welcoming station areas for people of all ages at all times.

Mobility – *stations should provide accommodations for people of all ages and abilities*

Truly accessible station areas require accommodations for people of all ages and abilities. The 60% design added a number of accommodations for people with mobility challenges such as ADA parking spaces in the drop-off loop of the 185th station, ADA ramps between areas of differing grade in the station areas, as well as use of texture strips to provide guidance into the station sites and to the train doors on the platforms.

At the 90% design milestone the City expects to see more detail on the planned amenities that will support mobility, address ADA, and also give attention to addressing the needs of vision and hearing impaired customers. The redesign of the 145th Station Kiss & Ride to also function as a plaza space will go a long way to facilitating mobility by eliminating the curb between the vehicle and pedestrian areas for mobility of wheel chairs, rolling luggage, and strollers. Curb ramps may be needed for this same purpose at the 185th Station Kiss & Ride loop.

Public Amenities – *the stations should provide gathering places that create a sense of community and emphasize art, culture, and history of the community*

The 60% Design of the stations does incorporate a number of the public amenities identified in the guiding principle such as public restrooms, covered bicycle cage and locker parking, and use of public art. Some of these amenities do need additional design detail to determine if this guiding principle is met and a couple of elements are still lacking.

In particular, we understand that City staff and Sound Transit are working towards agreement on design at the 185th Street Bridge that includes weather protection, but not enough detail has

been provided to know if it will create an iconic look. Similarly, the limited modifications proposed to the existing 195th Street non-motorized bridge do not create an iconic look nor contribute to a sense of community. We expect that Sound Transit and the City can come to agreement on bridge designs that are consistent with the guiding principles in the near future.

The 60% open house station designs also seem to be lacking with regard to provision of public gathering spaces and leasable vendor spaces. Additionally for both stations, details on covered and uncovered seating options, covered bike racks, icon-based signage for way-finding and flexible spaces for gathering and entertainment have not yet been completed. The City expects that Sound Transit will revise the station designs prior to the 90% design milestone to reflect the design direction from City staff for public plaza space at each station, seating, and weather protection.

We understand from City staff that additional collaborative solutions are in development and we expect that these will be resolved as soon as possible to demonstrate compliance with the City's adopted Special Use Permit criteria.

Public Art – integrate elements of art wherever possible

The concepts from the station artists, Mary Lucking and Buster Simpson, were well received at the open house event. Consider expanding use of the decorative screen cutout onto the 185th and 195th Bridge designs to contribute to an iconic look. Artwork by Buster Simpson could also contribute to the iconic design of the stations if it were drawn into the open stormwater facility south of the station between NE 145th Street and the northbound I-5 onramp. The City looks forward to the artwork taking shape and pending design of the smaller artwork elements throughout the station areas at the 90% design milestone.

Transit Oriented Development – promote TOD through facility siting and design that is supportive of future development opportunities

Future transit oriented development (TOD) is part of the vision for the area around the two stations. Sound Transit has identified the southeast corner of the 185th Station area for a future Sound Transit TOD project. Currently this portion of the site contributes to meeting the public gathering space, Kiss & Ride, and landscaping requirements for the site. Any TOD development would need to incorporate all required elements of the Station area into the proposed development.

The City is very concerned by the proposed stormwater vault south of 185th Street between 5th Avenue NE and 8th Avenue NE. This currently private property is an excellent location for future TOD development as it is directly across the street from the station, but placement of a stormwater facility would eliminate this property from future development. We understand that Sound Transit is working with City staff to relocate this stormwater flow control function off of this prime TOD site and expect that this will be resolved in the near future with a solution that is compatible with future redevelopment in this location.

The City understands that no similar TOD project site is planned for the 145th Station area. To date, it is also unclear whether any other surplus areas along the alignment, within the recently adopted station areas, would lend themselves to additional TOD opportunities.

Station designs are moving towards facilitating connections from the stations to the surrounding neighborhoods, but Sound Transit has not yet demonstrated how the station areas will integrate with and connect to TOD areas adjacent to the stations. Advancing designs on multi-modal access to the site from the north of each station could potentially accomplish this. At the 145th Station, north of the station, the City is interested in developing a Woonerf-style connection between 149th and 151st Streets for future transit rider drop-off capacity. At the 185th Station, to the north, the City is working with Sound Transit to develop a shared-use path connection from 189th Street, to be collocated with the maintenance access road into the station. Both of these projects would serve as non-motorized connections between the stations and future TOD projects nearby.

Project Mitigation

Existing public infrastructure and amenities are directly impacted by the Lynnwood Link Extension project such as public roads, intersections, sidewalks, parks, and utilities. The 60% design clearly illustrated the partnership between the City and Sound Transit in identifying design solutions for streets that need to be rebuilt that will get transit riders to the station more safely. These partnering solutions include shared-use paths in lieu of standard bike lane and side walk configurations on 5th Ave NE south of NE 185th Street; on segments of 1st Avenue NE that need to be relocated; and a portion of 3rd Avenue NE south of NE 155th Street. These collaborative solutions result in fewer sidewalks for Sound Transit to build, more shared-use paths, narrower roadway design, and reduced need for new stormwater flow control and water quality facilities, while doing a better job of providing safe multi-modal access to the stations while still meeting surface water protection standards. More opportunities for creative solutions to address project impacts and adapt City standards to benefit both the LLE project budget and the affected Shoreline neighborhoods and infrastructure are in development and we hope that Sound Transit leadership will support these win-win solutions when they are brought forward for concurrence.

We also wanted to be sure you were aware that a few significant project elements still need to be added to the project to meet the Federal Transit Administration (FTA) Record of Decision on the project's Final Environmental Impact Statement and the City's adopted codes for light rail systems:

- Transportation mitigations are required by the FTA for improvements of two Shoreline intersections on Meridian Ave NE;
- Neighborhood Traffic Calming Plans and Parking Management Plans for both stations; and
- Multi-modal access mitigation plan for funding or constructing Sound Transit's proportional share of improvements to mitigate impacts to the City's transportation infrastructure.

The Special Use Permit application continues to be incomplete without this required multi-modal access mitigation plan.

Thank you for your consideration of our comments. The City appreciates the collaborative approach Sound Transit is taking on this project and the active involvement of City staff in the design process. We look forward to seeing 90% design of the Lynnwood Link Extension through Shoreline. Should you have questions regarding the City's comments, please do not hesitate to contact our Project Manager, Juniper Nammi, at 206-801-2525 or jnammi@shorelinewa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Chris Roberts', with a long horizontal flourish extending to the right.

Christopher Roberts, Mayor

cc: Shoreline City Council
Debbie Tarry, City Manager
John Norris, Assistant City Manager
Scott MacColl, Intergovernmental Programs Manager
Margaret King, City Attorney
Randy Witt, Public Works Director
Rachael Markle, Planning and Community Development Director
Juniper Nammi, Shoreline Sound Transit Project Manager
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