



**Title:** East Link Extension National Environmental Policy Act (NEPA) Re-Evaluation

**Date:** February 2013

**Type and Date of Last Federal Action:** FTA issued NEPA Re-Evaluation in February 2013

The 2013 NEPA Re-evaluation included refinements in the Bellevue corridor, additional information regarding tunnel construction in Bellevue, and a revised noise analysis along SR 520 in Redmond.

**Title:** East Link Extension NEPA Re-Evaluation

**Date:** October 2016

**Type and Date of Last Federal Action:** FTA issued NEPA Re-Evaluation in October 2016

The 2016 NEPA Re-Evaluation included refinements about staging areas, traction power substations, and the Rainier Station along I-90.

**Title:** East Link Extension NEPA Re-Evaluation

**Date:** May 2017

**Type and Date of Last Federal Action:** FTA issued NEPA Re-Evaluation in May 2017

The 2017 NEPA Re-evaluation described changes to I-90 operations and Mercer Island bus transit integration.

**HAS THE MOST CURRENT AND OTHER PERTINENT APPROVED ENVIRONMENTAL DOCUMENTS BEEN RE-READ TO COMPARE PROPOSED PROJECT CHANGES?**

**NO (STOP! The most current approved environmental document MUST be re-read prior to completing a re-evaluation.)**

**YES**    **NAME:** East Link Project Final Environmental Impact Statement (EIS)  
                  **DATE:** July 2011

Additionally, East Link NEPA Re-evaluations and State Environmental Policy Act (SEPA) Addenda issued in 2013, 2016, and 2017 were reviewed. These documents do not include refinements to the alignment in Segment E.

**IS THE PROJECT CURRENTLY UNDER**     **DESIGN**    **OR**     **CONSTRUCTION?**

**REASON FOR RE-EVALUATION**

The Downtown Redmond Link Extension was formerly known as Segment E of the East Link Project for which FTA and Sound Transit completed a Final Environmental Impact Statement (EIS) in 2011. After completion of the Final EIS, the Sound Transit Board selected Marymoor Alternative E2 as the project to be built within Segment E (referred to hereafter as the 2011 Project) as part of the full-length East Link Project, and FTA and FHWA each issued a Record of Decision. SEPA Addenda and NEPA Re-evaluations to the Final EIS were issued in 2013, 2016, and 2017, and did not change the selected alternative in Segment E. The 2013 Re-evaluation and SEPA Addendum was the only document that included additional information in Segment E related to noise impacts along State Route (SR) 520 between NE 40th Street and West Lake Sammamish Parkway NE. Since the environmental analysis for the 2011 Project was completed for the Final EIS, conditions in the study area have changed. As a result, Sound Transit is updating the environmental review for the 2011 Project to address these changed conditions as well as evaluating refinements to the 2011 Project design. The Washington State Department of Transportation (WSDOT) has widened SR 520 between West Lake Sammamish Parkway and SR 202, including modifications to the ramps at the SR 520/SR 202 interchange. Additional mixed-use developments and the Redmond Central Connector Trail have also been constructed in downtown Redmond. Several planning processes have been concluded, including Sound Transit 3 (ST3), METRO CONNECTS, and amendments to the City of Redmond Comprehensive Plan, specifically the Marymoor Subarea Plan, which adds density, population, and employment to the

subarea. These developments have resulted in changes to the transportation system, land use, and other resources in the corridor. As a result, Sound Transit has studied modifications to the 2011 Project so that it can be constructed and operated in the areas where conditions have changed. These modifications are referred to as the Proposed Design Refinements.

The Proposed Design Refinements include refinements that were not included as part of the 2011 Project studied in the Final EIS, notably an elevated profile from Bear Creek to downtown Redmond, and additional work in the Bear Creek area (see discussion in “Description of Project Changes or New Information” section, below).

#### **DESCRIPTION OF PROJECT CHANGES OR NEW INFORMATION**

As with the 2011 Project, the Proposed Design Refinements start at the East Link interim terminus at NE 40th Street, just past the Redmond Technology Center Station (formerly called Overlake Transit Center Station). The Proposed Design Refinements would extend light rail for 3.4 miles from the East Link interim terminus and terminate just east of 164th Avenue NE. This would be about 0.3 mile (1,600 feet) shorter compared to the 2011 Project. The Proposed Design Refinements include two stations: an at-grade SE Redmond Station and an elevated Downtown Redmond Station. Approximately 460 feet of tail tracks for train layover and turnback operations would continue west of the station, terminating just east of 164th Avenue NE. Crossover tracks would be located just west of 170th Avenue NE in downtown Redmond, whereas the 2011 Project previously located the crossover tracks west of the SE Redmond Station. The corridor is described in three geographic sections: Redmond Technology Center Station to Sammamish River, Sammamish River to Bear Creek, and Bear Creek to Downtown Redmond. Locations where the 2011 Project alignment has shifted are described in each section.

**From the Redmond Technology Center Station to the Sammamish River**, the Proposed Design Refinements alignment runs parallel to the east side of SR 520 as it travels north from NE 40th Street to the Sammamish River. The alignment with the Proposed Design Refinements is similar to the 2011 Project, but has been modified in several locations to minimize impacts on adjacent roadways and to accommodate WSDOT’s planned improvements. Between NE 40th Street and NE 51st Street, the alignment shifts up to 20 feet away from SR 520 to maximize available WSDOT right-of-way and limit impacts on the adjacent property. The refinements also shift the alignment up to 25 feet away from SR 520 south of NE 60th Street and up to 30 feet near the West Lake Sammamish Parkway NE eastbound off-ramp.

**From the Sammamish River to Bear Creek**, the Proposed Design Refinements alignment is similar to the 2011 Project. Both alignments are elevated over the Sammamish River. The elevated guideway for the Proposed Design Refinements would match the height of the SR 520 bridge and would not have any columns within the ordinary high water mark of the river. The Proposed Design Refinements would transition from elevated to a retained-fill section as it crosses Marymoor Park, whereas the 2011 Project transitioned from elevated to retained-fill to at-grade across the park. Similar to the 2011 Project, the Proposed Design Refinements’ alignment would be at-grade as it enters the SE Redmond Station and crosses underneath SR 520 before rising to cross over Bear Creek. The SR 520 ramps would be raised as part of the Proposed Design Refinements to allow the necessary clearance for the light rail to cross underneath.

Different than the 2011 Project, the Proposed Design Refinements would accommodate an at-grade trail connection between the East Lake Sammamish Trail and Redmond Central Connector with a bridge over Bear Creek. If funding is provided by King County, the missing link to the East Lake Sammamish Trail would be built by Sound Transit when the light rail extension is constructed. The Proposed Design Refinements would modify the existing floodplain and floodway elevations by removing the existing bridge and twin culverts and widening the Bear

Creek channel. Like the 2011 Project, the lowest portion of the Bear Creek bridge for the Proposed Design Refinements would be approximately 3 feet or more above the 100-year flood elevation of Bear Creek. Changes to the floodplain and floodway would be evaluated through a quantitative modeling analysis conducted as part of City of Redmond permitting and approval (further details are included in Section 3.7.1 of the SEPA Addendum). The Proposed Design Refinements are not expected to have permanent adverse impacts to Bear Creek; instead, the refinements would have a beneficial impact on Bear Creek compared to the 2011 Project. The removal of the existing bridge and widening of the channel would allow for more flood water conveyance closer to the stream's natural configuration in this area and would not increase flood risk. These improvements to the Bear Creek channel would complement restoration efforts completed downstream since 2011. The improvements were not contemplated and therefore not analyzed for the 2011 Project.

The other primary changes in this section are related to the City of Redmond's plans allowing the Marymoor Subarea to develop around the SE Redmond Station as a transit-oriented neighborhood with mixed-use developments, including a revised street network and new trail connections. Currently, there are no joint development plans in the station area. Sound Transit would evaluate the feasibility of joint development if a proposal is presented. Additional environmental review would occur, as appropriate, at a later date should Sound Transit pursue a joint development.

**From Bear Creek to Downtown Redmond**, the Proposed Design Refinements change the profile and station location compared to the 2011 Project. The Proposed Design Refinements include an elevated profile from Bear Creek through downtown Redmond with an elevated station spanning 166th Avenue NE, whereas the 2011 Project profile and station would be at-grade. In addition, the alignment in downtown Redmond is shifted slightly to the south of the 2011 Project alignment to accommodate the Redmond Central Connector Trail.

Description of the Proposed Design Refinements and changed conditions are described in detail in Chapter 2 of the attached Downtown Redmond Link Extension SEPA Addendum.

**HAVE ANY NEW OR REVISED LAWS OR REGULATIONS BEEN ISSUED SINCE APPROVAL OF THE LAST ENVIRONMENTAL DOCUMENT THAT AFFECTS THIS PROJECT? If yes, please explain.**

- NO  
 YES

The Fixing America's Surface Transportation Act (FAST Act) was issued in December 2015. The FAST Act's new rules do not affect the analysis of the proposed refinements. A 2015 rule by the Environmental Protection Agency and Corps redefining "Waters of the United States" for the Clean Water Act was altered by a final rule in February 2018. The implementation of the 2015 rule was delayed until 2020. Therefore, there is no change in the status of waterbodies or wetlands affected by the Downtown Redmond Link Extension.

The Downtown Redmond Link Extension will comply with the current laws and regulations that are applicable to light rail projects under federal jurisdiction.

**IS THE LIST OF THREATENED AND ENDANGERED SPECIES (NMFS AND USFWS) MORE THAN 6 MONTHS OLD?**

- NO  
 YES (STOP! Endangered Species lists and analysis MUST be updated.)

**WILL THE NEW INFORMATION HAVE THE POTENTIAL TO CAUSE A CHANGE IN THE DETERMINATION OF IMPACTS FROM WHAT WAS DESCRIBED IN THE ORIGINAL ENVIRONMENTAL DOCUMENT FOR ANY OF THE AREAS LISTED BELOW?** For each impact category, please indicate whether there will be a change in impacts. For all categories with a change, continue to the table at the end of this worksheet and provide detailed descriptions of the impacts as initially disclosed, new impacts and a discussion of the changes. The change in impact may be beneficial or adverse.

<b>Transportation</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Land Use and Economics</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Acquisitions, Displacements, &amp; Relocations</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Neighborhoods &amp; Populations (Social)</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Visual Resources &amp; Aesthetics</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Air Quality</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Noise &amp; Vibration</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Ecosystems (Vegetation &amp; Wildlife)</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Water Resources</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Energy &amp; Natural Resources</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Geology &amp; Soils</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Hazardous Materials</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Public Services</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Utilities</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Historic, Cultural &amp; Archaeological Resources</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Parklands &amp; Recreation</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Construction</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Secondary and Cumulative</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

**Will the changed conditions or new information result in revised documentation or determination under the following federal regulations?**

<b>Endangered Species Act</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Magnuson-Stevens Act</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Farmland Preservation Act</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Section 404-Clean Water Act</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Floodplain Management Act</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>CERCLA (Hazardous Materials)</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Section 106 National Historic Preservation Act</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Uniform Relocation Act</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Section 4(f) Lands</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Section 6(f) Lands</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Wild &amp; Scenic Rivers</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Coastal Barriers</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Coastal Zone</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Sole Source Aquifer</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>National Scenic Byways</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Other: U.S. Coast Guard - Navigable Waterways, Section 408</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

**If you checked yes to any of these, describe how the changes impact compliance and any actions needed to ensure compliance of the new project:**

**Endangered Species Act**

During the Final EIS process, Sound Transit prepared a biological assessment for Endangered Species Act (ESA) consultation. Analyses in that document were based in part on the expectation that no construction activities or permanent structures would be required below the ordinary high water mark (OHWM) of Bear Creek or the Sammamish River. The Proposed Design Refinements identify work elements that would be required below the OHWM. To address the changes in the manner or extent of anticipated effects on ESA-listed species, Sound Transit has prepared an updated biological assessment on behalf of the FTA to facilitate the reinitiation of consultation with National Marine Fisheries Service (NMFS) under Section 7 of the ESA. NMFS issued a biological opinion with a determination that construction and operation of the Downtown Redmond Link Extension will not jeopardize the continued existence of ESA-listed species under that agency’s jurisdiction. The U.S. Fish and Wildlife Service (USFWS) agreed with Sound Transit and the FTA that reinitiation of consultation was not warranted at this time (February 2, 2018, FWS Ref. No. 13410-2011-I-0074).

**Section 404 – Clean Water Act**

**Floodplain Management Act**

In both King County and City of Redmond, floodplain management requirements will be addressed through local agency permitting. In addition, the project will require a U.S. Army Corps of Engineers (Corps) Clean Water Act Section 404 permit, which will also evaluate consistency with Executive Order 11988. Furthermore, the Corps’ Section 408 review is triggered by the application for a federal permit and will also occur as part of the project’s Corps Clean Water Act Section 404 permit evaluation.

The Proposed Design Refinements would maintain or lower the Bear Creek floodplain and floodway elevations depending on what City of Redmond-approved changes to the channel

configuration are implemented. In addition, the project would prepare a Conditional Letter of Map Revision (CLOMR) documenting the proposed Bear Creek floodplain and floodway changes, which the City could submit to the Federal Emergency Management Agency (FEMA) for incorporation into its flood-insurance mapping records. After the project is constructed, the City would lead the Letter of Map Revision (LOMR) process with FEMA, which has review and approval authority, with the result being an official change to the flood-insurance mapping records. Sound Transit documented the Downtown Redmond Link Extension's consistency with the 8-step process and next steps for the CLOMR and LOMR process for review by FEMA. FEMA acknowledged the project's consistency with the decision-making process for the Executive Order.

King County and the City of Redmond administer floodplain and floodway regulations and determine any necessary mitigation efforts. Similarly, the Corps administers its flood control projects and determines whether any alterations may occur and any necessary mitigation efforts. After initial consultation with King County, the City of Redmond, Corps, and FEMA, the Proposed Design Refinements do not initially appear to have materially adverse impacts on the floodplain, floodway, or flood control project. After completion of the re-evaluation, Sound Transit will submit the project for local and federal permitting from King County, City of Redmond, and Corps. Any additional changes to the project, including added mitigation, will be submitted to the FTA to be considered part of the transit project.

#### **Section 106 National Historic Preservation Act**

Sound Transit conducted archaeological investigations as part of the National Historic Preservation Act (NHPA) Section 106 compliance process for the Proposed Design Refinements. FTA determined and the State Historic Preservation Officer (SHPO) concurred that Sites 45KI451 and 45KI1365 are not eligible for the NRHP. Further details are described in the SEPA Addendum Section 3.9 and Appendix D, Historic and Cultural Resources Technical Report Addendum.

Formal consultation for Section 106 of the NHPA was conducted with agencies and tribes for the East Link Project's environmental review from 2006 to 2011. NHPA consultation specific to the environmental review of the Downtown Redmond Link Extension began in 2017 with formal re-initiation of Section 106 consultation. FTA and Sound Transit consulted with affected tribes to review the archaeological survey plan and provided information from the archaeological survey conducted for the Downtown Redmond Link Extension. FTA and Sound Transit have coordinated with the following federally recognized tribes: Confederated Tribes and Bands of the Yakama Nation, Muckleshoot Indian Tribe, Puyallup Tribe of the Puyallup Reservation, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, Suquamish Indian Tribe of the Port Madison Reservation, and Tulalip Tribes of Washington. In addition, FTA and Sound Transit have coordinated with the Duwamish Tribe and Snohomish Tribe of Indians.

#### **Section 4(f) Lands**

The Final EIS analyzed potential Section 4(f) uses by the 2011 Project to the following Section 4(f) resources: Marymoor Park, Sammamish River Trail, East Lake Sammamish Trail, Redmond Central Connector Trail, and Bear Creek Trail. Based on the analysis of recreation resource impacts in the Final EIS, coordination with officials having jurisdiction, and public opportunity for comment, FTA made a determination of *de minimis* for the Section 4(f) resource impacts in the study area for Marymoor Park, Sammamish River Trail, and Bear Creek Trail. The East Lake Sammamish Trail and the Redmond Central Connector Trail are exempt from Section 4(f), because they are located in a former BNSF rail corridor that has been railbanked (23 United States Code [USC] 138[f]).

Two additional Section 4(f) recreational resources were not included in the Final EIS Section 4(f) analysis. The Proposed Design Refinements may have construction impacts along the east edge of Bear Creek Park. In addition, Bridle Crest Trail, identified as temporarily impacted in the Final EIS, was not addressed under Section 4(f). FTA and Sound Transit have determined that these two Section 4(f) resources—Bear Creek Park and Bridle Crest Trail—would experience a temporary occupancy under Section 4(f). Under 23 CFR §774.13[d]), this temporary occupancy would not constitute a use of Section 4(f) resources. The City of Redmond concurred with the temporary occupancy determinations.

The City of Redmond concurred that Section 4(f) does not apply to the undeveloped property at 154th Avenue NE. Further details are described in the SEPA Addendum Section 3.11.

### **U.S. Coast Guard – Navigable Waters**

The Sammamish River is identified as a navigable waterway by the U.S. Coast Guard. Because the elevated guideway will cross over the Sammamish River, a General Bridge permit from the U.S. Coast Guard will be required. The crossing will not include columns within the ordinary high water mark and the bridge height will not be lower than the existing SR 520 bridge. Therefore, as described in the Final EIS, no mitigation of impacts on navigable waterways would be required.

### **Section 408**

Because of a historical Corps project, the Corps has authority by the Rivers and Harbors Act of 1899, 33 USC 408 (Section 408), to review and approve changes on the Sammamish River. In the Downtown Redmond Link Extension corridor, the Sammamish River is part of the federal Sammamish River Flood Control Project, which is a Civil Works project constructed by the Corps in the 1960s. Because the Proposed Design Refinements might add a new stormwater outfall to the Sammamish River, it would be considered an alteration of the Civil Works project and is subject to review and approval by the Corps.

### **Will these changes or new information likely result in substantial public controversy?**

Yes     No

#### **Comments:**

Sound Transit held two open houses in May 2017 and November 2017 and solicited public comments. The purpose of the May 2017 open house was to educate the community on the project history, provide an overview of the current project status, and share and gather comments on design concepts for the southeast and downtown Redmond stations and rail track from NE 40th Street to downtown Redmond. Project staff were available to answer questions and explain tradeoffs, benefits, and the decision-making process. Sound Transit accepted public comments in person at the open house and via email.

The purpose of the November 2017 open house was to present the current project and provide additional information on environmental impacts, notably noise and parks, and provide an opportunity to for the public to provide feedback on Section 4(f) resources. Neither public open house identified significant controversy over the Proposed Design Refinements. Although no substantial public controversy is expected, some opposition is anticipated associated with property owners during the residential and business displacement and relocation process. Sound Transit accepted public comments in person at the open house as well as via email and an online survey. In addition, staff have attended and given presentations at the Friends of Marymoor Park meetings.

In April 2017, the City of Redmond completed a study (Downtown Transit Integration Study) to determine how best to integrate light rail transit into downtown Redmond. This effort included



community engagement through a public meeting (January 2017), online questionnaire, and meetings with affected property owners. As a result of this study and community input, the City Council recommended an elevated alignment and station in downtown Redmond.

A description of public outreach efforts is provided in Chapter 5 of the SEPA Addendum.

**COMMENTS:**

**CONCLUSIONS AND RECOMMENDATIONS:**

As summarized in Table ES-1 of the SEPA Addendum, changes in impacts from the Proposed Design Refinements are of similar magnitude to the impacts identified for the 2011 Project and other alternatives evaluated in the Final EIS, and would not result in different conclusions regarding the significance of the impacts. Impacts from the Proposed Design Refinements would be within the range of impacts evaluated in the Final EIS, and these impacts can be mitigated. The Proposed Design Refinements do not substantially change the analysis of significant impacts evaluated in the Final EIS. No new probable significant adverse environmental impacts would arise; therefore, a supplemental EIS is not warranted.

**LIST OF ATTACHMENTS:**

Downtown Redmond Link Extension SEPA Addendum to the East Link Project Final EIS

- Appendix A Transportation Technical Report Addendum
- Appendix B Noise and Vibration Technical Report Addendum
- Appendix C Ecosystems Technical Report Addendum
- Appendix D Historic and Cultural Resources Technical Report Addendum
- Appendix E Water Resources Supporting Materials Technical Memorandum
- Appendix F Biological Assessment
- Appendix G Environmental Justice
- Appendix H Conceptual Design Sheets for the Proposed Design Refinements
- Appendix I Potentially Affected Parcels for the Proposed Design Refinements
- Appendix J Recent, Current, and Foreseeable Future Actions in the Project Area
- Appendix K Section 4(f) Correspondence

**SUBMITTED BY:**

By signing this, I certify that to the best of my knowledge this document is complete and accurate.

Name <i>Laurer Swift</i>	Date
Title <i>Senior Environmental Planner</i>	<i>August 27, 2018</i>

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