

# EDMONDS CROSSING

Connecting ferries, bus & rail



## 8.1 Introduction

This section contains responses to comment letters on the Draft EIS received from organizations and individuals by WSDOT during the comment period. Summaries of the substantive comments from these letters and the responses thereto are listed below; the comment letters are provided at the end of this chapter.

Where similar comments are made in different letters, the reader is referred to preceding letters and responses by the name of the government agency, organization, or individual making the comment and by the comment number.

## 8.2 Organizations and Individuals Comments and Responses

The following organizations and individuals commented on the Draft EIS:

- **Organizations**

- Brackett's Landing Foundation
- Edmonds Laebugten Salmon Chapter—Trout Unlimited
- Greater Edmonds Chamber of Commerce

- **Individuals**

- Greg Beach
- Forest Berg
- Mary Lou Block
- Danna Brumley
- Joseph P. Dray
- Thomas A. Farr
- Jeffrey P. Fisher, Ph.D.
- Don Hall
- Brad Hanson
- Ron and Colleen Jablonski
- John S. Leitch
- Sally Lider
- David MacFarlane
- Ken Marivy
- Edward J. McMorrow
- Larry Menue
- D.A. Minotti
- Robert J. Monks

- Frances Murphy
- Mike A. O’Brien
- Anne M. Robinson
- Geoffrey Scotton and Debbie Kinzel
- C. Edward Simons, M.D.
- Bonnie Storm
- Kari Thompson and Walter Thompson
- Tom Warek
- Steve Weagant
- Kris Webb
- Margaret Weidner, Ph.D.

## **8.2.1 Organizations**

### **Brackett’s Landing Foundation (Denis Murphy)**

#### **Comment 1:**

The position of Brackett’s Landing Foundation is that Edmonds Marsh cannot be “mitigated” away. There is no other saltwater marsh that can be “improved” and “substituted” for the impacts to the marsh.

#### **Response 1:**

The Point Edwards alternative has been modified in response to comments received on the Draft EIS. Some of those modifications—deletion of the dedicated bus driveway and realignment of the terminal access road—are intended to avoid direct impacts to Edmonds Marsh and increase the wetlands buffer area.

#### **Comment 2:**

The City of Edmonds, WSDOT, and BNSFRR should not be allowed to dump fill material into the marsh. Both build alternatives show railroad platforms on the east side of the existing tracks, threatening the marsh and a wetland between the ditched Willow Creek and the existing tracks.

#### **Response 2:**

The wetlands are recognized as a critical environmental resource and the design of the proposed facility would avoid impacts by aligning the rail platforms along the rail alignment as determined by the Sound Transit Commuter Rail project. Under either Modified Alternative 2 or Alternative 3, the rail platforms would not extend into the wetland area.

#### **Comment 3:**

Extending the already unacceptable culvert is an incomplete and inadequate plan that further inhibits a salmon-bearing stream system from performing its natural

function. We should be aggressively engineering a method of “daylighting” Willow Creek from the hatchery to Puget Sound.

**Response 3:**

In response to a number of comments from agencies, organizations, and individuals, the Point Edwards alternative has been modified to daylight an extensive portion of the existing Willow Creek culvert. Figure 2-3 of the Final EIS shows the proposed stream relocation. Most of the stream section parallel to and east of the railroad tracks would be opened. The stream would run through a culvert only where it would pass beneath an at-grade roadway and under the BNSFRR tracks. The result would be a considerable net reduction of culvert. The existing 389-meter-long, 122-centimeter (1,275-foot-long, 48-inch) culvert would be replaced by a 250-foot-long box culvert set deeply into the ground. The exact dimensions have not been determined yet but it would probably be a double (4-foot-by-6-foot) design, or something close. This is the shortest culvert that can be achieved crossing the railroad tracks without daylighting the stream mouth under the pier. Fish passage would be greatly improved over the present condition.

**Comment 4:**

The ferry access road should be located farther south in order to avoid disturbing the rookery (nesting sites) and the hatchery (salmon enhancement). Engineering concepts and planning are incomplete; reasonable alternatives are not presented. If anything, a major engineering effort should be made to build a better barrier/buffer.

**Response 4:**

Alternative 2 has been modified so that the terminal access road would be located farther south, providing an increased buffer for the Edmonds Marsh and wildlife, like the great blue heron, using this area. The Final EIS reflects this change.

**Edmonds Laebugten Salmon Chapter—Trout Unlimited  
(Walter Thompson)**

**Comment 1:**

A concrete culvert running over one-third of a mile is not a tidally influenced estuary that can provide transition habitat for salmon or for any other fish species. And the increased water volume associated with stormwater runoff will have a major impact on the migration of fish through the lengthened culvert.

**Response 1:**

Refer to response 3 (above) to the letter from the Brackett’s Landing Foundation.

Also, the less constrictive culvert size would allow saltwater exchange to improve, enhancing salt marsh function. Salmon passage through the marsh may improve with a greater tidal connection (higher water levels in the marsh at a given high tide level). Improvements to the Pine Street culvert would allow fish to pass upstream of this point. The mitigation measures presented in Section 4.9, Vegetation, Fish, and

Wildlife, of the Final EIS include a new water intake positioned above Pine Street that would improve hydraulic head in the Deer Creek Hatchery facility.

**Comment 2:**

The location of the floating breakwater at the Modified Point Edwards Alternative site would be well outside the littoral drift zone and would not interrupt natural alongshore littoral transport patterns. No discernable changes in the existing pattern of beach changes during the course of a year would be expected because of the floating breakwater. Reflected waves from the side of the breakwater that might reach the beach would be limited to incident waves from the north-northwest that strike the breakwater at oblique, shallow angles. As a result, the reflected waves would be small and travelling more or less in the same direction as the non-reflected waves. These reflected waves would not be expected to cause any noticeable changes in the existing sand transport along the beach. North-northwest wind storms are infrequent. Significant, long-term changes in the beach would not be expected, as the alongshore littoral drift from frequent southerly waves would far exceed the effects from other wave directions and will restore any minor variations in the typical shape of the beach.

**Response 2:**

Additional analysis was performed to estimate the effects of the proposed breakwater and wave barrier on the processes affecting the beach at Edmonds Marina Park. The analysis indicated that there would be a decrease of about 11 percent in the wave energy flux transporting sand northward into the beach at Marina Beach Park. However, the wave energy flux for northward transport of sand was calculated to be about 95 times that of the southward energy flux that removes sand from the beach. (Present-day northward energy flux is about 107 times the southward flux.) Since the beach is now in equilibrium with sand transport conditions except for seasonal fluctuations, this slight reduction in wave energy flux should not create substantial changes in the beach.

The floating breakwater and wave barrier would not block the highest energy waves associated with substantial onshore-offshore transport of sand. The existing seasonal changes in the beach profile should continue much in the same manner as they now do.

**Greater Edmonds Chamber of Commerce  
(Rob Morrison)**

**Comment 1:**

The Chamber's Transportation Committee recommends a more extensive Phase 1 scenario under Alternative 2.

**Response 1:**

The scenario suggested would be considered during final design and depending upon funding availability from Sound Transit for the Commuter Rail program would be implemented to the extent feasible.



## **BRACKETT'S LANDING FOUNDATION**

**FRANCES MURPHY, PRESIDENT**  
5804 168th S.W., Lynnwood, WA 98037  
(800) 468-9573, (206) 743-3339

April 27, 1998

Mr. Dale Morimoto  
Environmental and Special Services Manager  
Washington State Department of Transportation  
M/S 138  
P.O. Box 330310  
Seattle, WA 98133-9710

Mr. Morimoto:

I have consulted with other members of Brackett's Landing Foundation(BLF) and Edmonds Citizens' Awareness Committee(ECAC) and we are convinced that our President's earlier comments need amplification and emphasis.

Prior to any further consideration of the earlier comments, I want to be crystal clear that there is **ABSOLUTELY NO CONNECTION BETWEEN THE CLEANUP PROCESS OF THE POINT EDWARDS UNOCAL SITE AS DIRECTED BY THE WASHINGTON DEPARTMENT OF ECOLOGY, THE EDMONDS CITIZENS' AWARENESS COMMITTEE** and my submittal of comments on the Draft EIS for the SR 104 Edmonds Crossing.

In effect, I am demanding that any and all comentary regarding the host of questions and/or issues regarding "Multimodal" and/or "SR 104 Edmonds Crossing" be **RIGORIOUSLY** limited to the impacts on the Saltwater Marsh adjacent to the north side of the UNOCAL cleanup site.

My demand is that an "impenetrable wall" be constructed between those contentious and divisive "multi-modal" and "SR104 Edmonds Crossing" issues and our previous and present comments regarding the saltwater marsh.

Commentary, continued

I refer the reader to the following important figures in the Draft EIS:

- 1-Figure S-2(Pt Edwards Site Alternative #2)
- 2-Figure S-3( waterfront Site Alternative #3)
- 3-Figure 2-3-Alternative 2/Point Edwards
- 4-Figure 2-4-Alternative 2/Point Edwards
- 5-Figure 2-5-Alternative 3/mid waterfront
- 6-Figure 3-8-Surface water elements(showing tidegate locations)
- 7-Figure 3-9-(wetlands)IMPORTANT to this commentary
- 8-Figure 3-10-(vegetation and habitat)IMPORTANT to this commentary
- 9-Figure 3-18-(outfalls/Willow Creek and Edmonds Way)
- 10-Figure 3-19-(comp plan)-not illustrative of the marsh issue
- 11-Figure 3-20-(present zoning)
- 12-Figure 4-19-(wetland impacts/ALT #2)
- 13-Figure 4-20-(wetland impacts/ALT #3)
- 14-Fugyre 5-2-(POE Masterplan- shows actual right-of-way) IMPORTANT to this commentary

NOTE: Particular attention is drawn to the common factor in many of the above cited figures and the text of the Draft EIS, that factor being the denegation and reductiuon of the functions of the saltwater marsh. I believe the following issues define my concerns.

#### ISSUE #1-THE SALTWATER MARSH

The saltwater marsh is, for all practical considerations, a ONE OF A KIND National Resource. The saltwater marsh of Edmonds is one of very few saltwater marshes on the whole of the Pacific Coast. It has already been filled in by business interests (Burlington Northern, Union Oil, historical asphalt and tar processors and the Edmonds Port Authority) to the extent of at least a fifty percent(50%) reduction of the historical marsh.

BLF's position regarding the marsh is simple and concise:

NOT ANOTHER TEASPOON

By that we mean the saltwater marsh can't be "mitigated" away. There isn't another saltwater marsh that can be "improved" and "substituted" for the Edmonds Saltwater Marsh. There isn't another saltwater marsh that can be improved on a 16:1 or 5:1 or 1:1 basis---there just aren't any saltwater marshes left. The Edmonds Saltwater Marsh is a "ONE OF A KIND".

Commentary, continued

ISSUE #2-ONE OF A KIND STATUS

The City of Edmonds, the Department of Transportation and particularly Burlington Northern should not be allowed to dump fill material anymore in the saltwater marsh. I direct your attention to the Draft EIS, page 5-10, Figure 5-2. The figure clearly shows the BNSFRR right-of-way is on the WEST of the existing tracks.

② Both Alternative #2(Point Edwards Site) and Alternative #3(mid waterfront site) show the railroad platforms on the EAST side of the existing tracks. If the parties to Alternative #3 can convince affected property owners at the mid waterfront site to give up their property for some "greater good", so be it. Brackett's Landing Foundation is adamantly opposed to any filling of existing wetland.

NOT ANOTHER TEASPOON

Such a filling proposal is incorporated in Alternative #2. I direct your attention to the Draft EIS, pp. 3-34, Figure 3-9. There is a clearly defined and obvious on-the-ground wetland between the ditched Willow Creek north of the now defunct saltwater gate and the existing tracks.

We are not privy to what agreement was made between the Port of Edmonds and Burlington Northern to allow the Port of Edmonds to store boat racks up to the tracks. That's their problem. The parties should not be bound to whatever rationale is going to put many more than an additional TEASPOON of fill into the remaining irreplaceable saltwater marsh. Let the Port of Edmonds move their storage facilities between Olympic Beach and Railroad Avenue. Let the City of Edmonds relocate the western most portion of Admiral Way. Don't add a TEASPOON of fill to the saltwater marsh.

③ The filling of that part of the saltwater marsh would further extend the already unacceptable culvert. This is an incomplete and inadequate plan; we should be aggressively engineering a method of "daylighting" Willow Creek from the existing hatchery to Puget Sound, not further inhibiting a salmon bearing stream system from performing its natural function.

Commentary, continued

ISSUE #3-THE ROOKERY AND THE HATCHERY

Alternatives 2 and 3 need to be engineered so that the five(5) and six(6) lane access road at Pine and SR 104 can be located further south. In this area the engineering concept and planning are incomplete. The scrutiny is spotty and incomplete; reasonable alternatives to the plan are not presented.

The rookery (nesting sites) and the hatchery(salmon enhancement) should not be disturbed. If anything, a major engineering effort should be made to build a better barrier/buffer between these wildlife resources and the Alternative #2 and/or #3 activities.

4) Brackett's Landing Foundation is vehemently opposed to any negative effect on those two wildlife resources. As it is, air and sound pollution will be impacting this area, so there is not reason to increase the impact with thoughtless placement of the road or removing rookery trees just because engineers have not completely addressed the problem. I might mention that at our last BLF Conference, Snohomish County Councilman Gary Nelson pointed out a buck and doe peacefully grazing along the north edge of the UNOCAL lower yard treeline. They continued to graze notwithstanding the passage of one of Burlington Northern's Diesel triple engine long freight train with excessive horn blowing. We should be able to barrier/buffer the marsh from the ferry usage of either Alternative #2 or #3 and thus protect fish and other wildlife now using the saltwater marsh in downtown Edmonds.

Thank you

  
Denis Murphy

Treasurer, BLF

5804 168 S.W.

Lynnwood WA 98037-8320

cc:

G. Fong  
J. Okamoto  
P. Mar  
J. Alb  
S, Price  
Ecology  
UNOCAL

**EDMONDS LAEBUGTEN SALMON CHAPTER--TROUT UNLIMITED**

**Review of Draft Environmental Impact Statement concerning fishery resources--Edmonds Crossing.**

There are several issues that we feel were not addressed in the statement concerning fish, fish habitat and overall wildlife habitat protection. Our concerns relate mainly to the Point Edwards site.

① The Point Edwards as well as the Mid-Waterfront site both propose an additional 400 feet of culvert to be added to the existing 1200 feet. The increased water volume associated with storm water run-off from more roads, parking facilities and structures will also have a major impact on the migration of fish through the pipe, especially if it is 1600 feet long.

A concrete culvert running for over one-third of a mile is not a tidally influenced estuary that can provide transition habitat for salmon or for any other fish species.

② The outfall of Willow Creek runs in a culvert for a distance of approximately 1,200 feet before it enters the Sound. The end of the culvert is exposed at a zero tide. During the calm weather summer months the outfall is partially blocked by sand and gravel. Sand also builds up around the culvert mouth creating a well effect more than an outfall. With the onset of September and October storms, the wind and waves from the southwest sweep the area clean from around the outfall. The pipe is then somewhat suspended above the beach--possibly a foot or so--allowing the fish a better access to the pipe.

With the construction of the Point Edwards ferry pier plus the installation of a floating breakwater and wave barrier wall, the dynamics of the wind/wave action which keeps the culvert mouth clear during the time of fish migration would be considerably diminished. This situation would create a substantial barrier for fish passage.

Countable returning adult salmon to Willow Creek above the wetland has been a recent event because prior to 1992 there was a tide gate that prevented salt water intrusion into the marsh from November through April. Now, several things have to come together before adults can reach the southeast edge of the marsh: a fairly high tide that coincides with a good rainstorm and strong southwesterly winds will usually bring the fish to the Deer Creek Hatchery area of Willow Creek.

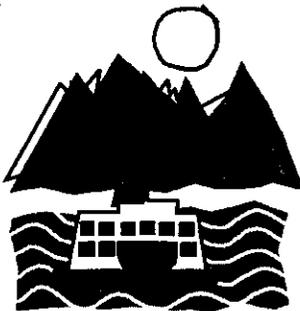
A majority of the returnees originate from our yearly Coho net pen project located at the north end of the Edmonds marina on the public fishing pier. With a prevailing northerly current flow, these fish are imprinting on the wetland outfall. Coho salmon have returned each year since 1994, and the number of fish that return to the marina area seem to be constant--somewhere between 150 to 300 fish. Several groups spend weeks milling around in the boat basin. There seems to be an early group, mostly smaller fish, and then toward the middle of November typically a group of bigger fish show up. The smaller fish are the ones that make the trip across the marsh. However, we have had males close to ten pounds make it to the hatchery. Over the years we have also observed Chum salmon that probably followed the Coho, and the Cutthroat trout population has been increasing over the last several years. We have not been able to establish if any are sea runs,

but we have observed them through the year. Reports of Chinook salmon have also been made. The salmon that are not able to move through the wetland because of the lack of high water typically become dinner for bald eagles and other birds of prey that work the wetland at this time of year. This past year a juvenile eagle was around the hatchery end of the marsh while the salmon were in the creek.

Over the past decade the health and viability of the Unocal marsh and the adjoining feeder creeks has slowly improved. In a time when urban growth seem to be almost out of control, we have experienced an increased presence of fish and wildlife in the wetland.

The issues of water quality and habitat protection that surround this project need to be thoroughly addressed. If not, the overall well-being of the wetland is in danger.

Walter Thompson  
Edmonds Laebugten Salmon Chapter



GREATER EDMONDS CHAMBER OF COMMERCE

APR 20 '98

DATE RECEIVED		INIT	DATE
TO	DISTRIBUTION		
	ENV. PROG. MGR.		
	AIR & TRUSE		
	HYDRAULICS		
	BIOLOGY		
	TECHNICAL		
	RECYCLE		
	OTHER		
	FREE		

April 16, 1998

To: Dale Marimoto  
 Environmental & Special Service Mgr.  
 WSDOT MS-130  
 P.O.Box 330310  
 Seattle, WA. 98133-9710

Dear Mr. Marimoto:

Thank you for the opportunity to respond to your invitation to comment on the Environmental Design Hearing for the Draft Environmental Impact Statement covering the "Edmonds Crossing", the outgrowth of the "Model Multimodal Terminal".

This response is lengthy but it summarizes discussions the 3-MT (Transportation) Committee of the Chamber have had on the subject over several years. It responds to the economic growth for the City of Edmonds and waterfront. Projections for the immediate future, 2003-2006, that include cost increases in some suggestions for expansions to Alternative 2, Phase 1, Scenario A, to satisfy those pending growths.

A review of rail and ferry passenger and vehicle boarding projections in this document are causes for our concerns.

This document has been approved by the Board of Directors of the Greater Edmonds Chamber of Commerce. The author has served as the Transportation Chairman of the Chamber for the past five years, and was the Chamber advisor representative to the MOU that developed the Model Multimodal Terminal.

Sincerely yours,

Rob Morrison  
 Chairman, Transportation Committee  
 The Greater Edmonds Chamber of Commerce

crossing

1.

1. Response to some a few objections as reported in the local newspaper;

Marina Beach Park area,

Use of this Park would not be impeded. Resident use of the Marina Park adjacent to the Kingston passenger loading ramp has not been affected by that ramp.

Identity crisis in Edmonds,

Because vehicles in the collector lanes must move forward at 20-25 minute intervals now, little value to Edmonds for shopping or visiting is experienced. With all vehicle holding in the Pine St. access, the 13+ acres from Dayton to Main and Sunset to the Railroad, vacated, can become new residential and commercial developments.

Added Ferry service can be a "Boon" to Kitsap.

True. It has been a boon to Kitsap and will continue to grow as King and Snohomish County residents move accross the Sound to escape the increasing costs of property. At the same time, however, the increased traffic for the suburban dwellers, plus Navy personnel to Everett has substantially added to annual long lines in the SR-104 collector lanes.

This Committee sees little value in Alternate 2, Phase 1, Scenario B, Figure 2-4, Page 2-19. Primarily, a very wide surface approach (with up to 12 collector lanes) leading to a "temporary" ramp over the railroad tracks seems an unwise use of the property in that projected traffic increases will soon force that area to be replaced by the gradual rise ferry collector lanes and vehicle parking area by 2006 or sooner.

The Mid-waterfront Alternate 3 Phase 1, Figure 2-5, page 2-21. Planners have identified this alternate to be located at the foot of Dayton St., extending parallel to the north breakwater of the Port of Edmonds. The Chamber agrees with the Edmonds Council that this location would split the waterfront area into two sections that would discourage economic development.

xing/01A

Washington Dept.of Transportation Marine Division

- \* Ferry Boarding Characteristics.....
  - 38% of passengers are "walk-on"
  - 33% are Drive-on...Single Occupancy Vehicles (SOV)
  - 20% are Drive-on with one or more passengers
  - 5.5% are Vans and Carpools

- \* Ferry Boarding Statistics and Projections
  - From ..(WSDOT Marine & PSRC {2020})
  - Combined annual Vehicles and Passengers

<u>In 1988</u> (actual & projected)	<u>In 1998</u> (actual & projected)
1986 actual.....2,531,563	1980 actual...1,555,630
1988 actual.....2,800,000	1990 actual...3,363,475
1991 <u>reached</u> ....3,750,000	1997 actual...4,015,000
2000 projected..3,810,000	2000 projected..5,140,000
	2003 projected..5,733,542
	2010 projected..6,918,425
2020 projected...5,500,000	2020 projected.. <u>8,695,900</u> *
	* Based on growth % projected from 2000 to 2010

Note 1.  
In 1992 the projection for 2020 was ..7,000,000

Note 2.  
In both all long range projections, above, the growth rates are higher than projected..therefor...it is logical to assume the short range actuals will be higher (2003 to 2006) and 2003 terminal accommodations should be increased accordingly.

In consideration of costs for the various alternatives...

* Alternative 2,Phase 1,Scenario A ...	\$66.4	Million	
(preferred ?) add-on to complete...	<u>77.5</u>		
	\$143.9		"
Alternative 2,Phase 1,Scenario B...	\$57.3		
add-on to complete...	<u>90.6</u>		
	\$147.9		"
Alternative 2,Phase 1.....	<u>\$143.9</u> or <u>\$147.9</u>		"

\* Assuming the Alt.2,Ph 1,Scen.A at \$66.4 mil.includes:

1. A temporary terminal on the ferry ramp over the RR tracks...(no listed cost), and,
2. Is complete with stairway and ADA elevator from the ground level, and,
3. Two Ferry slips are complete with passenger loading ramp (either the Main St.ramp or other), and,
4. The Breakwater and wave barrier are included, and,
5. Includes covered train platforms(1 each side) of tracks and
6. There is no permanent station at ground level....and,
7. Buses make turn-around and re-enter collector lanes.

Edmonds Chamber of Commerce Transportation Committee (3M-T) recommends Alternative 2,Phase 1, Scenario A(1) for the"startup" Alternative. Priced at approximately \$80 to \$90 million, and containing the following changes and additions;

1. Delete the Temporary Terminal on upper level of ramp.
2. Add the planned Multimodal Terminal, with minimum services, ticket vending, etc., containing a secured elevator and stairway completely meeting Alt.2,Ph.1.plans.
3. Parking area as shown, but, delete the Bus turn-around and add the Busway exit parallel to the RR, north to Dayton St., thereby adding more park and ride space.
4. Add passenger shuttle bus(es) from stairway to ferry apron.

Reasons for the modifications .....

The projections for ferry traffic by 2006 will number approximately 6,300,000 total vehicles and pasengers..

SR-104 will continue to be called on to store Queing Lanes south of Pine St., extending up to the traffic light at 15th.St.(226th).

3a

Bus returns from the dock to City and County routes will result in added congestion and time loss at the Pine St. intersection.

The CT buses should return via a Busway adjacent to the RR Tracks (see Fig.2-1 Alt.2) north to Dayton, and thus into the City and the development in the vacated acreage between Dayton-Main and Sunset-BNSF RR.

The increased cost...

There are nine elements in the development of this Pt. Edwards Dock and Multimodal Terminal...WSDOT Marine, Hiway and Rail Departments, Amtrak, The City of Edmonds, Snohomish County, RTA, BNSF/RR, and, Private investors...with interests in the Parking and the Terminal Concessions.

2/1/alt

## **8.2.2 Individuals**

**Greg Beach, 9412 217th Street SW, Edmonds, WA**

**Comment 1:**

Not enough creativity or effort has been used in trying to expand the existing terminal.

**Response 1:**

Expansion of the existing Main Street ferry terminal was thoroughly evaluated. The results of this evaluation are summarized in Chapter 2 of the Draft EIS and discussed further in response 1 to the letter received from the Department of Ecology. This site is constrained by the underwater park, eelgrass beds, and other marine environmental constraints. The Main Street location possesses limited opportunity to provide a grade separation with the railroad. All of the options considered for continued use of this site would have a dramatic impact on the viability of the downtown core of businesses and hampered development in accordance with the City's long-range comprehensive plan.

**Comment 2:**

Edmonds Marsh has already been reduced in size by 50 percent for businesses that can barely make it. Reducing the size of the marsh further will impact bald eagles, coho smolt, and hundreds of species of wildlife.

**Response 2:**

See Table 4-8, which lists the wetland impacts of the different alternatives. Direct impacts to Edmonds Marsh, which totaled approximately 0.15 acre (not 5 acres as suggested in the comment) in the Draft EIS, have been eliminated by modifications to Alternative 2, described in Chapter 2 of the Final EIS. The wetland is likely to continue to provide habitat for coho salmon and foraging territory for bald eagle after the proposed construction is complete. A Biological Assessment has been prepared in accordance with the Endangered Species Act to ascertain the likely impact of the project on federally endangered, threatened, and candidate species (CH2M HILL, 2003).

**Comment 3:**

Willow Creek is already hampered by the existing culvert. Coho salmon have a hard enough time making it back to the Deer Creek Hatchery now. Increasing the length of culvert will make the water too swift for fish that are trying to stay in the marsh. A solution is to daylight the stream.

**Response 3:**

Refer to response 3 to the Brackett's Landing Foundation letter (page 8-3).

## **Forest Berg, 6421 Greenwood Avenue North, Seattle, WA**

### **Comment 1:**

More alternatives should be evaluated in the Draft EIS.

### **Response 1:**

Chapter 2 of the EIS explains the process used to identify potential alternative locations for the Edmonds Crossing project as well as alternative methods of addressing the identified needs. A range of alternative locations was evaluated from Point Wells in Shoreline to as far north as Picnic Point. No other feasible alternative was discovered during this evaluation.

### **Comment 2:**

We need more public input; I did not hear about the project until April 27, 1998.

### **Response 2:**

Discussions about the potential to relocate the Edmonds Ferry Terminal have taken place for many years. An initial study related to relocating the Edmonds Ferry Terminal resulted in the preparation of a 1992 Ferry Relocation Feasibility Study, which determined that the Edmonds Ferry Terminal could be moved. In April of 1992, Edmonds Mayor Laura Hall convened a focus group on multimodal visioning that included citizens in addition to representatives from such agencies as WSF, WSDOT, BNSFRR, and Amtrak. Following this meeting, numerous discussions between the City of Edmonds and Washington State Ferries culminated in the signing of an MOU in November 1993. This MOU also included Community Transit in order to foster a foundation for a joint working relationship to find common solutions to all parties' needs.

Citizens workshops were held in 1993 on waterfront issues that included discussions about the possible relocation of the ferry terminal. The Edmonds Crossing EIS process also began in 1993. In 1994, the Edmonds City Council held public hearings on the proposed project; these meetings eventually led to the Council approving the Edmonds Downtown Waterfront Plan, which specifically supports the Edmonds Crossing Project at the Point Edwards location. WSF also hosted open houses in 1995 in Edmonds and on a WSF ferry. Since that time, the Edmonds Crossing project team has been implementing the vision established by the City Council.

The Draft EIS was issued on February 25, 1998. In late February and early March, a two-column, 10-inch display ad was placed in the Everett Herald, Edmonds Enterprise, Edmonds Paper, and Kitsap County Herald. The ad announced the availability of the Draft EIS and the scheduling of an informal public hearing on April 2, 1998. Prior to the hearing, a project newsletter was mailed to approximately 2,000 residents, businesses, and property owners in the project area, as well as to 783 agency contacts and individuals on the project mailing list. Hearing notices were posted on the Edmonds-Kingston ferries and at the terminal waiting rooms. Onboard ferry briefings were conducted on March 31 and April 1 (a total of 85 people attended those briefings.) A traveling display was set up in both the Edmonds Public

Library and Edmonds City Hall. Approximately 80 people attended the public hearing on April 2, 1998. Nine of those attendees provided either formal verbal or written comments, or both, to the court reporter. Comment forms (like the one submitted by Mr. Berg) were also distributed to attendees, with instructions to complete it at the hearing or to mail it to WSDOT by April 27. Thirteen such forms were received. The initial ads, the newsletter, and all other distributed information indicated that all comments on the project should be received by April 27; a total of 17 letters were received from members of the public in response to the request for input, in addition to several comment letters from public agencies.

**Mary Lou Block, 23821 115th Place West, Edmonds, WA**

**Comment 1:**

Over the years, a number of studies have been carried out to determine the health of the Edmonds Marsh and how it could be protected most effectively. I hope that the information in these studies is carefully reviewed in the development of the EIS and that all possible steps are taken to maintain the health of this irreplaceable resource.

**Response 1:**

All relevant information on Edmonds Marsh developed and presented in previous reports has been incorporated in the studies and impact assessments for the Edmonds Crossing project. The EIS and design team recognizes and values the unique importance of the marsh, and has attempted to prevent and minimize adverse effects on it. The project has been designed and redesigned to avoid adverse impacts on the marsh, and a variety of mitigation measures would be implemented to further protect the marsh. The design for the Point Edwards site (Alternative 2) has been modified to eliminate a bus driveway that encroached on the west edge of the marsh, thereby resulting in no fill within the wetlands. Mitigation measures that would be implemented to protect Edmonds Marsh include implementing temporary erosion and sediment controls during construction, enhancing buffer areas adjacent to the marsh that currently have minimal ecological benefit, maintaining existing runoff flow pathways from the UNOCAL site, and constructing permanent stormwater treatment facilities for runoff from the multimodal terminal site.

**Danna Brumley, P.O. Box 11305, Bainbridge Island, WA**

**Comment 1:**

Having a briefing on the ferry was a great way to get to people who will not attend the public hearing in Edmonds.

**Response 1:**

Comment acknowledged.

**Joseph P. Dray, 21307 Pioneer Way, Edmonds, WA**

**Comment 1:**

The impact to Marina Beach Park is grossly understated in the Draft EIS. The Point Edwards alternative would effectively deny wildlife and local citizens the use of this vital community resource. Strong grassroots opposition will arise when the majority of Edmonds and Woodway citizens become fully aware of the threat to the park.

**Response 1:**

As discussed in the Draft EIS, impacts on wildlife from construction of the preferred alternative are not expected to be substantial, and access to Marina Beach Park would be maintained via Admiral Way. A major component of the Modified Alternative 2 is the realignment of the proposed ferry pier. Rather than placing the pier along the alignment of the existing UNOCAL pier, as described in the Draft EIS, the pier is now proposed to straddle the boundary between Marina Beach Park and the Port of Edmonds Marina. By doing so, this would provide the opportunity to merge the existing park to the north of the UNOCAL pier and the beach property to the south of the UNOCAL pier into a single, contiguous, and more expansive park. In addition, with the proposed removal of the UNOCAL pier, views of Puget Sound and toward the Olympic Mountains should be greatly enhanced. Please see response 5 to the Jeffrey Fisher letter (page 8-23) and response to T-34 to your comments at the public library (page 9-30) for further discussion.

**Comment 2:**

The Draft EIS does not fully address the safety issues that the Point Edwards alternative poses to sailboats accessing the Edmonds Marina. Three ferry slips would interfere with sailboat traffic, increase collision hazards, and diminish the usefulness of the Marina as a recreational facility. This alternative gives the impression of a piecemeal, uncoordinated idea, which is not well integrated with the existing facilities and resources.

**Response 2:**

Safety is a primary concern to the ferry system. An extensive analysis was performed to identify potential vessel interaction between ferries and small craft entering or leaving the Port of Edmonds marina. (Details of the analysis are presented in the Transportation discipline report [CH2M HILL et al., 2002].) Currently, ferries cross in front of the Marina entrance on approach to the Main Street terminal. Under the No Action Alternative, ferries may be forced to wait in the immediate vicinity of the Marina to dock at the single slip, thereby increasing the potential for collision between small craft and the ferries. Under the Modified Alternative 2 (Point Edwards Site), the ferry terminal would be located approximately 1,400 feet south of the Marina entrance. Boat traffic to and from the south may be affected, while boat traffic to and from the north would be improved over existing conditions. It should also be noted that most of the landings at the Point Edwards terminal would be in the southern slips, farthest from the Marina entrance. The only time the north slip would be used would be during extreme

weather conditions, in which case most small craft would not be out on Puget Sound.

**Comment 3:**

The long-term effects of vastly expanded vehicle traffic through the region's neighborhoods are not adequately addressed.

**Response 3:**

The impacts of the forecast multimodal transportation center and ferry traffic traveling through Edmonds' neighborhoods are analyzed in the "Off-Site Traffic Analysis" (Appendix B of the Final EIS).

**Comment 4:**

Servicing the development interests on the Kitsap Peninsula with increased ferry service does not justify the anticipated level of habitat destruction and Edmonds/Woodway community degradation.

**Response 4:**

The Edmonds-Kingston ferry is part of the highway corridor for SR 104. SR 104 is an important regional service link. This project is responding to overall growth in traffic along the corridor. Specific growth in Kitsap County is guided by a number of planning documents. (See response 6 to the U.S. Environmental Protection Agency's letter in Chapter 7 [page 7-13] for details regarding the development policies in Kitsap County.)

Habitat destruction that might result from the project has been minimized as a result of several design modifications and appropriate mitigation measures are proposed as part of the Final EIS. Refer to Chapter 2 for a discussion of the changes proposed to minimize impacts to the environment.

**Comment 5:**

The existing waterfront access problem is greatly exaggerated in the Draft EIS. Currently, waterfront access via Dayton Street is not impacted by ferry traffic.

**Response 5:**

The Draft EIS's assessment of waterfront access conditions is based on forecast traffic volumes, the existing and proposed street and traffic control system, and existing and future railroad operations. The Dayton Street access to the waterfront is affected by ferry traffic to the extent that ferry traffic affects the Dayton/Edmonds Way intersection.

**Comment 6:**

The state should seriously consider the Point Wells Chevron site as a far more suitable site for a multimodal transportation facility.

**Response 6:**

The Point Wells site was carefully evaluated during an earlier phase of the project. The Point Wells site was eliminated from further consideration for a variety of reasons described in Chapter 2 of the Draft EIS, including:

- Access to and from the site would be via Richmond Beach Road, NW 195th, and NW 196th, all of which pass through a fully developed residential neighborhood.
- None of these arterials are designed to serve regional traffic traveling to and from a ferry terminal; upgrades would be required, resulting in substantial impacts to the adjacent residential communities.
- Access to I-5 would be via North 175th Street, which already has heavy traffic volumes and considerable congestion problems.
- The site failed to meet several of the project objectives: a location near trip-attracting commercial activity, a location on or near any major commuter routes, and transit potential limited mainly to ferry and rail commuters.
- Despite its current availability for acquisition, the Point Wells site continues to be considered an unsuitable site for the proposed multimodal transportation center.

**Thomas A. Farr, President & CEO, Petrocard Systems, Inc., 706 Cedar Avenue, Marysville, WA**

**Comment 1:**

Without question, a new terminal is needed. The terminal would improve the ferry service dramatically, improve the congestion, and signal progress for our community.

**Response 1:**

Comment acknowledged.

**Jeffrey P. Fisher, Ph.D., 19308 88th Avenue W., Edmonds, WA**

**Comment 1:**

There are no quantitative estimates provided in the Draft EIS for how the loss of wetland acreage will reduce carrying capacity for fish and wildlife. Furthermore, in-bank mitigation has not been addressed adequately. For example, will the current ferry holding lanes be removed and reverted back to the wetland it once was?

**Response 1:**

The project proponents recognize the value of the Edmonds Marsh. Project design emphasizes minimum direct impact to the Edmonds Marsh. In response to public

and agency comment on the Draft EIS, the Point Edwards alternative has been modified to avoid the 0.15-acre (not 0.5-acre as indicated in your letter) impact to the Edmonds Marsh associated with the bus driveway adjacent to the BNSFRR (see Section 4.8, Wetlands). As a result, there would not be an impact on the carrying capacity of the wetland for fish and wildlife.

**Comment 2:**

Construction of the ferry access road will create a substantial physical barrier to wildlife supported by the Edmonds Marsh. Discussion of impacts from this permanent disturbance is inadequate in the Draft EIS and in-kind mitigation is not proposed. Mitigation should consider the creation of an overpass on the access road so that wildlife can continue to move between upland and wetland habitats.

**Response 2:**

The Pine Street culvert proposed beneath the new SR 104 would be sized so that small mammals (for example, raccoon, opossum, river otter) would be able to pass beneath the road in all weather conditions with the exception of extreme storm events. As mitigation for impacts of the project, the oversized culvert would provide enhanced habitat connectivity compared to existing conditions. The culvert would most likely not be large enough to accommodate large mammals, such as the black-tailed deer, which are almost certainly infrequent visitors to this habitat.

**Comment 3:**

The paving proposed for the access road and parking lot will result in additional losses of surface drainage to the marsh through their redirection to stormwater outfalls. Neither the impacts from the altered hydrology nor their potential effects on fish and wildlife resources have been quantified.

**Response 3:**

This response assumes the comment applies primarily to Alternative 2, which would have a greater area of impervious surface draining to Willow Creek than Alternative 3. Based on available topographic maps, UNOCAL drainage system maps, and field observations, most of the runoff from the existing UNOCAL site appears to enter Willow Creek and Edmonds Marsh near the southwest corner of the marsh. The two detention basins on the UNOCAL property discharge to the Willow Creek channel near the outlet of the marsh. Runoff from other portions of the property that does not flow into these basins enters Willow Creek and Edmonds Marsh farther upstream and the creek channel farther downstream. With the proposed project, site runoff from all roads and parking areas would be discharged to Willow Creek (via a stormwater treatment pond) near the outlet of the marsh, generally replicating existing flow patterns.

The only portion of the site that would have redirected runoff would be the eastern edge near SR 104. Slight reductions in flow entering Willow Creek and Edmonds Marsh in this vicinity should have minimal effect on these receiving waters because the reduced runoff inputs would be negligible compared to the flow volumes carried into the marsh by Willow Creek and Shellabarger Creek. Because each build

alternative would not substantially change the existing runoff flow pathways on the UNOCAL site, substantial effects on fish and wildlife habitat as related to hydrologic conditions are not expected.

**Comment 4:**

By building a breakwater at Point Edwards, the normal cycle of sediment accretion and erosion along the beach would be disrupted and there would be great potential for the beach to erode over time. This erosive potential has not been adequately addressed with quantitative study.

**Response 4:**

Refer to response 2 to the letter from Edmonds Laebugten Salmon Chapter-Trout Unlimited (page 8-4).

**Comment 5:**

Bisecting Marina Beach Park will completely destroy the character of the area and effectively eliminate its use for the public. The loss of the park would be irreplaceable and non-mitigatable.

**Response 5:**

A major component of the Modified Alternative 2 is the realignment of the proposed ferry pier. Rather than placing the pier along the alignment of the existing UNOCAL pier, as described in the Draft EIS, the pier is now proposed to straddle the boundary between Marina Beach Park and the Port of Edmonds Marina. The pier structure would be high enough above the existing ground level to allow for continued use of the park activities beneath, including the existing parking area and grassy play area and the existing pedestrian walkway connecting the Port Marina and the park. There is no doubt that the park will experience increased traffic noise and a general increase in activity in the vicinity of the park as a result of the construction of the project. However, access to the park would be maintained and existing use would be able to continue. In addition, the modified design, in combination with the proposed removal of the UNOCAL pier, would provide the opportunity to merge Marina Beach Park north of the UNOCAL pier with the beach property to the south, thus creating a single, contiguous, and more expansive park resulting in enhanced views of Puget Sound and Olympic Mountains. Daylighting of the Willow Creek outlet would also provide an area for viewing migrating salmon and for potentially developing associated interpretive displays and activities within the park.

Although the character of the area surrounding the park would change as a result of the project's dominant presence, this change is in keeping with the City's objectives for development of the waterfront area, as described in the City of Edmonds Comprehensive Plan and the Downtown/Waterfront Plan. Both of these plans envision Marina Beach Park as an important amenity within an area of relatively intensive mixed-use development at the UNOCAL site and to the north on Port of Edmonds property.

**Comment 6:**

Much of the information on fisheries resources presented in the Draft EIS is not particularly relevant to the habitat affected. Substantial anadromous fish resources continue to use the marsh despite the degraded habitat. With habitat modifications, the system could be restored to meet its natural potential.

**Response 6:**

The EIS presents all aspects of the environment and considers the impacts to all resources. Environmental law does not require mitigative restoration to pristine conditions for impacts to environments degraded by others in the past.

The project would improve salt marsh function, improve fish passage, and enhance salmonid resources in Willow Creek due to culvert reduction, culvert retrofitting, daylighting long sections, large woody debris installation, and other improvements. These would be net improvements. Habitat improvements downstream of the hatchery would increase the rearing capacity of Willow Creek. With improved passage at Pine Street and habitat improvement in the reach above, a natural run of coho is possible. The vast majority of salmonid that currently use the creek do so because of hatchery releases, not natural production as the commentor implies.

**Comment 7:**

Lengthening the culvert will create a permanent velocity barrier to juvenile salmonids and at least a partial velocity and/or depth barrier to adult salmonids. Discussion of velocity barriers is conspicuously absent in the Draft EIS, and no adequate mitigation is proposed.

**Response 7:**

The existing Pine Street culvert presents a partial block to salmon due to velocity. As part of the project, the existing steep, smooth-bottomed culvert would be replaced with a larger (but not longer) bottomless arch culvert with a “simulated stream channel” inside. This action would create free passage and thus allow access to the reach above this point. The design would follow WDFW guidelines for steep culvert retrofitting. The “simulated stream channel” concept uses boulders to roughen the channel bottom in order to slow velocity to meet the physiological limitation of salmonids as small as 6 inches.

**Comment 8:**

Adding an additional 400 feet of culvert to the lower portion of the creek will further ensure that no juvenile salmonids from outside the system will be able to use the system for rearing or refuge. It will also worsen the passage conditions for adult salmonids.

**Response 8:**

Refer to response 3 to the letter from the Brackett’s Landing Foundation (page 8-3).

**Comment 9:**

Considering the possible listing of Puget Sound coho under the Endangered Species Act (ESA), it is in the best interest of the City, WSF, and WSDOT to fully consider all potential impacts of the proposed alternatives and develop appropriate mitigation plans that not only prevent long-term impacts but actually improve conditions for the species.

**Response 9:**

The modifications to the Point Edwards alternative, Alternative 2, and the mitigation measures proposed would improve conditions for salmonids. The implications of ESA listing are fully taken into account in the impact analysis and the proposed mitigation in the Final EIS. Refer to Section 4.9, Vegetation, Fish, and Wildlife, and the BA.

**Comment 10:**

Mitigation proposed in the Draft EIS is inadequate. Only general statements offer little substantial understanding of what will actually be done to benefit the aquatic species. Mitigation measures that should be considered include:

- Remove all or part of the culvert that directs flows from Willow Creek into Puget Sound and create an open, habitat-enhanced stream channel. Alternatively, the culvert could be removed and the drainage could be directed farther south into a culvert underlying the BNSF tracks
- The Pine Street culvert should be replaced with a lighted, bottomless arch culvert with appropriate habitat structures.
- Channelized habitat within Willow Creek should be enhanced with structures favoring fish passage and rearing potential.
- Establishment of terrestrial wildlife corridors permitting access to the marsh from the southwest (at the very least).
- Use of porous concrete to permit more natural drainage and less alteration to peak flows in Willow Creek.

**Response 10:**

Most of the culvert at the mouth of Willow Creek would be removed as a part of the modified Point Edwards alternative (see Chapter 2 of the Final EIS for a description of the realignment and daylighting of Willow Creek). The elimination of much of the culvert would benefit coho salmon and cutthroat trout. The intertidal reach of Willow Creek is not suitable for pink salmon. There is no spawning habitat potential. The gradient is so flat in this reach that any gravel placed there would soon be covered with silt and rendered useless. Similarly, habitat structures (such as log weirs and log vanes) in this reach would largely be cosmetic amenities. The gradient is too flat for scouring action to create or maintain pools. Large woody debris (LWD) placement in this reach would be recommended for cover and

ecosystem complexity. Habitat structures in the short reach between the Pine Street culvert and tide water are fairly good but could be improved with dynamic LWD placements or with engineered structures. The Brackett's Landing Foundation is currently in the process of preparing a grant proposal to do just that.

Proposed improvements to the Pine Street culvert would allow fish to pass upstream of this point. The improvements would include replacing the existing steep, perched, smooth-bottomed culvert with a larger bottomless arch culvert with rock weirs inside. The new culvert would be sized in such a way that small mammals (e.g., raccoon, opossum, river otter) would be able to pass beneath the road in all conditions with the exception of extreme storm events.

Although porous concrete would offer an attractive option for reducing flow volumes entering Willow Creek and could also reduce onsite stormwater treatment costs, it would not be well-suited to the heavy traffic volumes that would occur on most of the site. In addition, over time the porosity of the pavement would be reduced due to sediments and grit deposited by vehicles. Porous pavements are better suited to low traffic applications where wear and tear from heavy vehicles is minimized and sediment loads are low. There may be portions of the site where porous pavements could be used effectively, such as sidewalks. The mitigation measures discussed in Section 4.6, Waterways and Hydrologic Systems, in the Final EIS include measures discussed in this suggestion.

**Comment 11:**

The subject of groundwater contamination near the Point Edwards site has not been adequately addressed.

**Response 11:**

Groundwater contamination has been detected at the UNOCAL property, which is partially included in the Point Edwards project site. Detailed technical data is included in numerous submittals and reports prepared by UNOCAL for the Washington State Department of Ecology. Information regarding the detected groundwater contamination are discussed in Sections 3.3.7 and 4.16, Hazardous Waste, of the Final EIS.

**Comment 12:**

The need for the access road to the Mid-Waterfront site is unclear. The existing SR 104 leading to the existing ferry could be utilized. What will happen to the existing roadway if the traffic is redirected toward a new road? The proposed access road would also disrupt the flavor of the existing marina.

**Response 12:**

The purpose of a new access route for Alternative 3 is to provide a grade separation between ferry traffic and the railroad. During the pre-EIS phase of this project, an alternative access route using SR 104 to Dayton Street was considered; it is described in Chapter 2 of the Final EIS. This alternative route was rejected because of the extremely complex engineering required to construct and maintain an

undercrossing at the railroad tracks that would be up to 20 feet below the level of Puget Sound. It was believed that ferry commuters would perceive this approach to be unsafe. In addition, this alignment would have disrupted access to the Port and would have made access to nearby commercial activities extremely difficult.

**Comment 13:**

There is no statement in the Draft EIS related to the Mid-Waterfront alternatives regarding mitigation for the construction of another over-water structure. As mitigation, the UNOCAL pier could be removed or (at least) day lighted.

**Response 13:**

Removal of portions of the existing Main Street ferry terminal (the wooden portion of the pier to the water side of the concrete abutment) are proposed in the Final EIS. The UNOCAL pier would be removed as well.

**Comment 14:**

Ferry conflicts with the existing fishing pier (e.g., scouring) could be resolved by either moving the Fishing Pier (possibly to the UNOCAL pier) or by erecting a breakwater.

**Response 14:**

Little, if any, propeller scour is expected around the Edmonds Fishing Pier based on additional analysis conducted since the publication of the Draft EIS. Based on the scour pattern for a Jumbo Mark II (JM2) class ferry, the scour area is estimated to end approximately 75 feet from the Edmonds Fishing Pier. Details of the analysis are provided in Section 4.6, Waterways and Hydrological Systems, of Chapter 4. As indicated in this section, if scour occurred around the Fishing Pier pilings, it would be expected to be minor and preventable with the use of suitable armoring, such as stones. With no expected impact (or with a simple potential solution if there is any scouring), there would be no need to move the fishing pier or build a breakwater. Moving the fishing pier or building a breakwater would have impacts of their own, such as pile driving and sea floor alteration.

**Don Hall, 432 Olympic Avenue, Edmonds, WA**

**Comment 1:**

Fifty thousand additional cars in Edmonds will create horrible traffic and health problems.

**Response 1:**

The project would not attract or create additional traffic in Edmonds; rather, the project would better serve the increased traffic that is generated by population and employment growth in Edmonds and throughout the region. Traffic safety impacts are presented in the “Off-Site Traffic Analysis” (Appendix B of the Final EIS).

**Comment 2:**

What will happen to businesses in and around the city? Some are likely to be put out of business.

**Response 2:**

Alternative 3 is the only alternative where businesses would be directly affected by the project, due to right-of-way acquisition. A total of 24 businesses and 107 (47 full-time and 60 part-time) employees would need to be relocated if Alternative 3 were developed. Details of business displacements are presented in Section 4.11, Relocation, of Chapter 4 of the Final EIS.

To the extent that downtown businesses are dependent on ferry traffic, there might be some lost business if traffic is diverted to a new terminal. However, some businesses might also see improvements as the substantial congestion associated with ferry traffic is moved away from the downtown core.

**Comment 3:**

The project will require great chunks out of people's property.

**Response 3:**

Modified Alternative 2 would require the acquisition of roughly 22.6 acres of additional land (affecting four parcels) for new right-of-way; almost 85 percent of this land (19.1 acres) would be UNOCAL and BNSFRR property. Under Alternative 2, about 1.1 acres of new right-of-way would be required over open water. No homes or business establishments would be displaced.

Approximately 2.3 acres of park and Port of Edmonds property would be beneath the elevated holding and egress lanes; however, the structure would be high enough to permit continuation of the current uses. Alternative 3 would require the acquisition of roughly 22.3 acres of additional land (affecting 12 parcels) for new right-of-way. As with Modified Alternative 2, much of the new right-of-way would be UNOCAL and BNSFRR property. The boat storage and repair facilities located on Port of Edmonds property between Admiral Way and the BNSFRR right-of-way would also be displaced. About 0.2 acre of new right-of-way would require the displacement of three single-family residences on the waterfront adjacent to the Edmonds Bay Building in front of Olympic Beach Park. A total of 24 business establishments would also be displaced, located primarily in the Sunset Avenue complex (the old Safeway store) and the Edmonds Bay Building. Some of the displaced businesses could relocate to the retail space proposed for the ground floor of the new parking garage of the multimodal center.

A project goal is to minimize acquisition of, and impacts to, adjacent property. As can be seen from the discussion above, while the impacts may be considered substantial to those directly impacted, the impacts are relatively minimal to adjacent properties considering the nature of the proposed improvements. Existing rights-of-way would be used to the maximum extent possible, and retaining walls and other features would be employed, if necessary, to further minimize impacts.

**Brad Hanson, 210 Pine Street, Edmonds, WA**

**Comment 1:**

An additional option for the Pine Street/SR 104 intersection should be considered—no traffic to or from SR 104 via Pine Street. The base option is unacceptable in that it would result in the continuation of the currently intolerable use of a narrow residential street as a state highway.

**Response 1:**

Since the publication of the Draft EIS, the design of the Pine Street/SR 104 intersection has been selected and incorporated into the overall project design. The option suggested in the comment is, in fact, the selected design (see Figure 2-7). The configuration selected would prohibit vehicles leaving the ferry terminal and multimodal center from traveling eastbound through the intersection on Pine Street by means of signage and barriers. Equally important, vehicles traveling westbound on Pine Street would be restricted to right-turns only (onto northbound Edmonds Way) and would not be allowed to continue through the intersection toward the ferry terminal and multimodal center.

**Comment 2:**

The Draft EIS does not address how the noise from increasing traffic on SR 104 would be mitigated for residents south of Pine Street and west of 3rd Avenue. The change of the SR 104/Pine Street intersection will change the way vehicles operate (i.e., increasing noise due to starting/stopping at the intersection). WSDOT needs to include noise reduction barriers along SR 104 in order to mitigate this adverse impact.

**Response 2:**

Under both project build alternatives, the proposed design of the Pine Street/SR 104 intersection would be signed and channelized to prevent westbound traffic on Pine Street from accessing the Edmonds Ferry. As a result, no increases in traffic volumes on Pine Street are anticipated to occur due to the proposed project. Existing noise levels at residential locations south of Pine Street and west of 3rd Avenue are well below the FHWA noise abatement criteria and would remain at such levels into the future. Therefore, noise mitigation measures are not considered necessary.

**Ron and Colleen Jablonski, 649 NW 195th Street, Shoreline, WA**

**Comment 1:**

The ferry terminal should be relocated to the Mid-Waterfront site. We believe that it will have the least impact on the environment.

**Response 1:**

Comment acknowledged.

**Comment 2:**

The Draft EIS does not address the impact that the Point Edwards alternative will have on the Edmonds Marsh and Willow Creek. It is not sufficient for an EIS to state that it cannot predict the effects of a proposed plan. Research, careful thought, and innovative alternatives are required.

**Response 2:**

The production of the Draft EIS involved the collection of large amounts of existing and new data. For example, studies were performed on wildlife and fish use of the Edmonds Marsh and on the wetland communities present in the marsh. The design of the project alternatives has incorporated many innovative ideas to minimize intrusion into the natural habitats in the project vicinity. For example, since the publication of the Draft EIS, the project has included the realignment of Willow Creek from its present culvert entrance and its redesign to allow for a number of daylighted sections through the project area. Much of the stream east of the railroad tracks would be enhanced with large woody debris and landscaping to improve salmon habitat. In addition, to avoid direct impacts to Edmonds Marsh, the dedicated bus driveway included in the Draft EIS, which extended from the multimodal center northward parallel to and along the eastern edge of the BNSFRR right-of-way to Dayton Street, has been eliminated in the Modified Alternative 2 design. The possible effects of the project will continue to be studied in the further design stages, and will meet or exceed all permitting conditions prior to and during construction. These permit conditions have been developed with a great deal of thought and study to provide a conservative level of protection to resources.

**John S. Leitch, 233 3rd Avenue South, Edmonds, WA**

**Comment 1:**

The impact of southbound I-5 and SR 99 access to SR 104 has not been adequately addressed.

**Response 1:**

The “Off-Site Traffic Analysis,” presented in Appendix B of the Final EIS, provides forecast multimodal transportation center and ferry traffic volumes en route to and from I-5 and SR 99, the traffic route(s) (including SR 104), and the impacts of this traffic.

**Comment 2:**

The air quality impact of over 1,500 vehicles emitting pollutants at any given time, in addition to increased diesel train traffic, was not adequately addressed.

**Response 2:**

The air quality impacts were addressed in accordance with currently prescribed federal and state guidelines and methods. Operational impacts were estimated according to EPA’s *Guidelines for Modeling Carbon Monoxide from Roadway*

*Intersections and Guidebook for Conformity: Air Quality Assistance for Non-Attainment Areas.* Emission factors were estimated for each vehicle speed evaluated in the analysis using EPA's model MOBILE 5b.

**Comment 3:**

Edmonds residents and businesses are unlikely to receive any financial benefits from a project that concentrates people and their vehicles in such a small area.

**Response 3:**

The degree to which the existing Main Street ferry terminal or any of the proposed alternatives provide economic opportunities in the City of Edmonds, the fiscal benefits would be largely local in nature. Residents and businesses would benefit from any increase in sales or property taxes that result from development of a new terminal and any induced development activity.

**Comment 4:**

Concerned about the westward view of the Puget Sound and the Olympic Mountains being obstructed by the project.

**Response 4:**

Potential view blockage is examined in Sections 3.3.8 and 4.17, Visual Quality, of the Final EIS. As noted in the document, Modified Alternative 2 would have little effect on views of the Puget Sound and the Olympic Mountains from residential areas on the gentle slope to the east of the Edmonds basin. In general, the project would lie within the middle ground of views from this area and would be far enough away from the eastern residential slope of Edmonds to not substantially stand out from the Port of Edmonds Marina. The proposed multimodal center at the Mid-Waterfront site may actually improve the visual quality of the central commercial area as seen from the residential neighborhoods on the eastern slope. The new ferry pier would be far enough away from the residential areas that it would blend with the existing waterfront development.

**Sally Lider, 2526 205th Place SW, Alderwood Manor, WA**

**Comment 1:**

The Draft EIS does not take into account the fact that the access road would bisect habitat areas, increasing the disruption of wildlife corridors between nesting and feeding areas.

**Response 1:**

Refer to response 2 to Jeffrey Fisher's letter (page 8-22).

**Comment 2:**

The disturbance to Edmonds Marsh will be substantial and probably discourage use of the habitat by bald eagles and other sensitive species.

**Response 2:**

Comment noted. See the discussion of impacts to foraging bald eagles and other species in Sections 3.2.8 and 4.9, Vegetation, Fish, and Wildlife, of the Final EIS. Bald eagles are addressed specifically on page 3-63 of the Draft EIS. Also see the Biological Assessment prepared in compliance with the requirements of the Endangered Species Act.

**Comment 3:**

Adding 400 feet of culvert to Willow Creek will further decrease fish access to this important stream. This seems contradictory to efforts to remove fish barriers in light of the probable listing of salmon species as endangered.

**Response 3:**

Refer to response 3 to the letter from the Brackett's Landing Foundation (page 8-3).

**David MacFarlane, 13800 Getchell Road NE, Lake Stevens, WA**

**Comment 1:**

Why not build the parking, as shown in the Mid-Waterfront alternative, with an overpass across the railroad tracks. It would be cheaper in the long run. The ferry dock could be extended to allow for more slips.

**Response 1:**

Railroad overcrossings require 26 feet of clearance. When the depth of the required bridge structure is added to the 26-foot clearance requirement, the distance between the surface of the roadway overpass and the top of the rails could very easily exceed 32 feet. To construct an overpass with these height requirements would require a massive structure with long approach grades. The preferred alternative (Modified Alternative 2, the Point Edwards site) addresses this need by using the natural topography of the UNOCAL tank farm site to gain access to an overcrossing of the railroad without long approach grades and massive structures.

**Comment 2:**

There is no reason to extend asphalt through the marsh.

**Response 2:**

Comment acknowledged.

**Ken Marivy, 5505 Kitsap Way, Bremerton, WA**

**Comment 1:**

The preferred site (Point Edwards) looks great. Look forward to moving on.

**Response 1:**

Comment acknowledged.

**Edward J. McMorrow, 1024 4th Avenue South, Edmonds, WA (April 5, 1998, Letter)**

**Comment 1:**

The Draft EIS is flawed in that it does not address the future carrying capacity of the Edmonds-Kingston ferry run. By my count, it would be possible to put up to nine ferries on the run with a triple slip dock at Edmonds and one additional slip at Kingston. By doing so, development in the North Kitsap Peninsula would be made possible.

**Response 1:**

Research indicates that increasing capacity might accelerate the point in time at which development occurs but does not cause it (*Expanding Metropolitan Highways, Implications for Air Quality and Energy Use, Special Report 245, Transportation Research Board*, page 348). Traffic volumes on the Edmonds-Kingston ferry route more than doubled from 1980 to 1990 and grew by over 40 percent between 1990 and 2000.

Furthermore, the control of land use development on the North Kitsap Peninsula is the responsibility of Kitsap County, not the City of Edmonds or Washington State Ferries. It is Kitsap County's responsibility under the State Growth Management Act to plan for growth within its borders, protect environmentally critical areas, determine appropriate land use densities, enact and enforce zoning controls, and permit building consistent with land use controls. Kitsap County adopted its revised County-Wide Comprehensive Plan in May 1998 and submitted it for review and validation by the Growth Management Hearings Board. The Board validated the plan in February 1999. Urban growth boundaries for the County's communities, including Kingston, have been reduced from previous versions of the plan to encourage compact urban development, efficient land utilization, and cost-effective urban service provision. Urban densities are allowed only in areas served by sewer systems and other urban services. Areas without these services are maintained in large-lot zoning, and urban densities are not allowed.

**Comment 2:**

The Draft EIS does not indicate how many new residents would live in northern Kitsap County once the increased auto-carrying ferry service would be implemented.

**Response 2:**

Kitsap Transit's 1998-2004 Transit Development Plan indicates on page 4 that the State of Washington Office of Financial Management's (OFM) Official Growth Management Act Population Projections for Kitsap County in 2020 range from 295,949 to 371,698. These projections represent a population growth of 29 percent to 62 percent over the County's 1997 population of 229,400. The OFM growth projections were made without regard to whether the Edmonds Crossing project is built. Furthermore, the Edmonds-Kingston ferry route has seen substantial growth in travel over the last 20 years without changes in the level of service other than the number of vehicles that individual vessels can carry. Growth in travel on the Edmonds-Kingston ferry route is certain to happen, as has been quantified and accounted for by the WSF Service Plan. This growth is not dependent upon the project being implemented. Even the No Action Alternative will need to deal with growth in traffic and it has already been demonstrated that a third vessel can operate with a No Action Alternative. The project would not cause an increase in traffic, but simply make the handling of the additional traffic more efficient.

**Comment 3:**

The Draft EIS does not address how vehicles exiting the ferry and desiring to travel to the north would be routed through Edmonds and what the impact would be to Edmonds' residents.

**Response 3:**

The "Off-Site Traffic Analysis," presented in Appendix B, provides forecast multimodal transportation center and ferry traffic volumes and routes to and from the north, and the impacts of this traffic.

**Comment 4:**

The Draft EIS does not address how the increased traffic on eastbound SR 104 would impact Edmond's residents.

**Response 4:**

Refer to the "Off-Site Traffic Analysis," presented in Appendix B. The analysis provides forecast multimodal transportation center and ferry traffic volumes using SR 104 and the impacts of this traffic.

**Comment 5:**

The Draft EIS does not address the impact of increased traffic on real estate values in Edmonds.

**Response 5:**

Any general impact on property values would be the same for each alternative, because the same total increase in traffic is projected for each. As the traffic flows vary according to the alternatives, there may be some localized differences in

potential property value impacts. As most of the diversion is from local streets to state highways (SR 104 and SR 99), it is unlikely that these diversions would have a substantial effect on property values. In addition, the number of trips diverted would be a relatively small share of the total traffic on these roadways.

**Comment 6:**

The Draft EIS does not address the impact of increased traffic on the provision of safety services along the roads serving ferry travelers.

**Response 6:**

As discussed in Section 4.12, Social, of the Final EIS, development of the proposed project would generally improve provision of police, fire, and emergency medical services to the waterfront area by providing an above-grade crossing of the BNSFRR tracks. Access to these services within the larger Edmonds downtown area would also be enhanced by the improved overall traffic circulation resulting from relocation of the existing Main Street ferry terminal.

**Comment 7:**

Offer a fourth alternative that would combine elements of Alternative 1 (No Action) and Alternative 3 (Mid-Waterfront). The main components of the new alternative would include:

- Locate the multimodal center at the Alternative 3 site or closer to Main Street.
- A people-mover sidewalk would automatically halt when trains were crossing Main Street.
- Build a bicycle “freeway” from Everett to Seattle along the BNSFRR right-of-way.
- Widen Main Street from Sunset Avenue to 7th Avenue and change the zoning on the east side of Main Street from 3rd Avenue to 7th Avenue to allow five- to six-story buildings (retail on the street level and residential use above).
- Acquire the UNOCAL property and convert to a city park.
- Investigate the feasibility of daylighting the outflow from Edmonds Marsh and routing it through Marina Beach Park.

**Response 7:**

In Chapter 2 of the Final EIS, the process used to screen alternatives is outlined. By subjecting this new recommendation to the screening process described in the text, it ranks lower in priority than the alternatives offered for evaluation in the EIS.

The concept of using a moving sidewalk that is linked to the approach of a train is interesting but would likely be expensive to build and maintain. People movers are

suggested only when the length of the walk becomes excessive for a substantial portion of the users.

Building a bicycle freeway from Everett to Seattle is beyond the scope of this project.

Widening Main Street would not meet the purpose and need of the project and would likely result in dramatic impact to the downtown.

Acquisition of the UNOCAL property for use as a park might be a consideration that the City of Edmonds could undertake either with or without the multimodal transportation center at Point Edwards.

The design concept for Alternative 2 has been modified to daylight much of the Willow Creek culvert. Chapter 2 of the Final EIS describes the differences between the design concept for Alternative 2 evaluated in the Draft EIS and the design concept presented in the Final EIS (Modified Alternative 2).

**Edward J. McMorrow, 1024 4th Avenue South, Edmonds, WA (July 8, 1998, Letter)**

**Comment 1:**

The construction of a multi-slip ferry dock in Edmonds will lead to reduced growth in property values in much of Edmonds because of the dramatic increase in commuters from the urbanization of the northern Kitsap County following construction of a new terminal.

**Response 1:**

Refer to responses 1 (page 8-33) and 5 (page 8-34) to your previous letter.

**Comment 2:**

Long-term increase in traffic from multislip dock and how traffic will affect the rest of Edmonds.

**Response 2:**

The impacts of the traffic forecast to travel to and from the multimodal transportation center and ferry terminal and through the city's neighborhoods are analyzed in the "Off-Site Traffic Analysis" (Appendix B).

**Larry Menue, 22102 98th Avenue West, Edmonds, WA**

**Comment 1:**

What provisions will be made to get southbound ferry traffic on Highway 99 on to SR 104 westbound and also to get eastbound traffic on SR 104 onto Highway 99 northbound? Without such arrangements, southbound ferry traffic will either be forced onto 238th SW, which has a low speed limit, or forced to continue to use 196th SW, Puget Drive, 9th Avenue, Caspers, and 3rd Avenue to Pine Street.

**Response 1:**

Forecast multimodal center and ferry traffic volumes enroute to and from the north via Highway 99, the route(s) this traffic uses, and the impacts of this traffic are analyzed in the “Off-Site Traffic Analysis” (Appendix B).

**Comment 2:**

The new bridge over the railroad and out to the ferries will be quite high crossing the beach at the south edge of Marina Beach Park. Columns that support the bridge should be as far apart as possible to allow full access to all parts of the beach if at all possible.

**Response 2:**

A major component of the Modified Alternative 2 is the realignment of the proposed ferry pier. The pier is now proposed to straddle the boundary between Marina Beach Park and the Port of Edmonds Marina. The pier would no longer be located at the south edge of Marina Beach Park, as described in the Draft EIS. The pier structure would be high enough above the existing ground level and the support columns as far apart as possible to allow for continued use of the park activities beneath, including the existing parking area (clearance would range from 25 feet on the east to 19 feet on the west), the grassy play area (clearance would range from 19 feet on the east to 14 feet on the west), and the existing pedestrian walkway connecting the Port Marina and the park (clearance of 10 feet).

**D.A. Minotti, 3740 East John Street, Seattle, WA**

**Comment 1:**

Looks good! Especially nice to see integration of bus and rail.

**Response 1:**

Comment acknowledged.

**Robert J. Monks, 16100 Pearson Road NE, Poulsbo, WA**

**Comment 1:**

After the UNOCAL storage tanks are removed, a multimodal parking garage could be built into the hillside. This proposal could save the cost of building a separate parking garage in the lower yard area and mitigate for building next to the Edmonds Marsh.

**Response 1:**

UNOCAL has removed the storage tanks as part of its cleanup of its property. Preliminary results indicate that the soils around the tanks are not contaminated. The approach roadway for both build alternatives would be benched into this hillside to take full advantage of the topography. Moving the parking garage and benching it

into the hillside would increase the cost of the project, require the removal and disposal of a large volume of earth that would require additional environmental analysis for the site at which the soils would be placed, and would create additional visual impacts as it would be more visible to a larger area.

**Comment 2:**

A consolidated parking/holding area incorporated into the hillside could be both functional and, with its low profile, aesthetically pleasing. It could also accommodate the separate functions of providing parking and overflow for the ferry holding area.

**Response 2:**

Refer to response 1 above.

**Frances Murphy, 5804 168th SW, Lynnwood, WA**

**Comment 1:**

The Draft EIS lacks any actual evaluation of the impact on Edmonds Marsh, its bird, mammal, or fish population.

**Response 1:**

Impacts to wetlands, vegetation, and wildlife are discussed under Section 4.8, Wetlands, and Section 4.9, Vegetation, Fish, and Wildlife, of the Final EIS. Impacts to threatened and endangered species are evaluated in the Biological Assessment prepared in accordance with the Endangered Species Act. Project design emphasizes minimum direct impact to the Edmonds Marsh. In response to public and agency comment on the Draft EIS, the Point Edwards alternative has been modified to avoid the 0.15-acre impact to the Edmonds Marsh associated with the bus lane adjacent to the BNSFRR. The project design has also been further modified to improve conditions for salmonids by daylighting portions of the Willow Creek culvert.

**Comment 2:**

Removing any the trees along the southern boundary of the Marsh will destroy a priceless rookery for great blue herons.

**Response 2:**

Subsequent to publication of the Draft EIS, great blue herons built nests in trees south of the Edmonds Marsh (Thompson, pers. comm., 1998), although they have not been active since (Thompson, pers. comm., 2003). In response to this information, the project design was modified to create a wider buffer between the south edge of the marsh (where most of the nests tend to be located) and the terminal access road. The road is now more than 100 feet from the closest heron nest. No trees would be removed in this area, and additional trees would be planted, as described in Section 4.9, Vegetation, Fish, and Wildlife, of the Final EIS. Also,

please refer to the Biological Assessment prepared in accordance with the Endangered Species Act.

**Comment 3:**

BNSFRR has no legal right to fill any of the Marsh on the western edge of the marsh. WSDOT is proposing an illegal proposition.

**Response 3:**

This project is not advocating a location for an additional rail line through Edmonds. The decision on rail expansion will be the subject of a separate evaluation led by Sound Transit. The exclusive bus driveway in Alternative 2 from Dayton Street to the multimodal terminal has been eliminated from the design; as a result, the modified Point Edwards site design (Modified Alternative 2) has no direct impact on the marsh.

**Comment 4:**

The word “mitigation” is tossed here and there in the Draft EIS. Can there be any mitigation offered that would replace our priceless saltwater marsh?

**Response 4:**

There would be no salt marsh (or freshwater marsh) lost to this project as described in Section 4.8, Wetlands, and Section 4.9, Vegetation, Fish, and Wildlife, of the Final EIS. As described in Section 4.9, buffer enhancement would be employed to mitigate for the indirect impacts to wetlands and wildlife using this habitat.

**Mike A. O’Brien, 2338 NE Alder Court, Poulsbo, WA**

**Comment 1:**

The Point Edwards alternative looks like a great location and idea. Let’s do it.

**Response 1:**

Comment acknowledged.

**Anne M. Robinson, 16315 48th Place West, Edmonds, WA**

**Comment 1:**

NEPA/SEPA requires that all alternatives must be considered until a final decision is made—which is not what was said at the open house.

**Response 1:**

The statements at the open house were not meant to imply that all alternatives were not being considered. NEPA allows for the identification of a preferred alternative. In this project, the Point Edwards site has been identified as the preferred alternative. Alternative 3, the Mid-Waterfront site, has been fully evaluated through the

environmental review process as a viable option. During the open house, it was stated that Alternative 3 has some serious environmental and community impacts that are not experienced at Alternative 2 (now Modified Alternative 2).

**Comment 2:**

The removal of the present pier would allow for eelgrass to be reestablished in that area as mitigation for the impact of the new Mid-Waterfront pier. It would be preferable to have a continuous eelgrass bed to the north, as there are no further shoreline obstructions.

**Response 2:**

Habitat restoration is proposed at the existing Main Street ferry terminal. The proposed restoration would reestablish eelgrass as mitigation for the impact of the new Mid-Waterfront pier. Specifically, restoration would include the removal of the dolphins and transfer span, the filling and regrading of the shoreline, the cessation of ferry activity, and the planting of eelgrass. This would result in a continuous eelgrass bed from the marina northward, because there would be no further shoreline obstructions.

**Comment 3:**

I want the design of the multimodal center kept in the general style (early 1900s) of the other houses in Edmonds. That flavor should be retained. The design should not be just glass and modern as in the artist's concept and should be reviewed by the appropriate historical society/group to ensure that it fits with the flavor of Edmonds and is the least offensive and obtrusive as possible.

**Response 3:**

As indicated, the plans for the multimodal transportation center are preliminary in nature and not at all final. The intent is to design a facility that is appropriate to its function and fits within the scale and character of Edmonds' commercial waterfront, both existing and historic. Building materials and forms will be evaluated and selected accordingly. Public opinion will be considered. The requirements of current building and fire codes will also contribute substantially to the layout of the facility and selection of finish materials. In addition, the Edmonds Architectural Review Board will have a substantial input to the ultimate character and style of the facility because the Board will publicly review the designs as they are developed. The Board's final approval is required.

**Comment 4:**

The Point Edwards alternative will make Marina Beach Park nothing more than a piece of grass that could just as well be in the uplands or anywhere else. It will remove the concept of a beachfront park.

**Response 4:**

Refer to response 5 to Jeffrey P. Fisher's letter (page 8-23).

**Comment 5:**

The placement of buffers to protect the ferries from the strong winds at Point Edwards would seem to preclude necessary wave action to move the drifting sand from the opening of Willow Creek.

**Response 5:**

Please refer to response 2 to the letter from the Edmonds Laebugten Salmon Chapter-Trout Unlimited (page 8-4).

**Comment 6:**

The Mid-Waterfront alternative will keep ferry passengers/commuters in closer proximity to the downtown merchants so that the economic viability/sustainability of Edmonds' merchants is not undermined, as it would be with the Point Edwards alternative.

**Response 6:**

Alternative 3 (Mid-Waterfront site) would concentrate the ferry-related activity closer to the downtown core and, as such, would result in fewer potential business disruptions than Modified Alternative 2. However, Alternative 3 would result in the need to relocate 24 current businesses employing over 100 people. Moving the terminal to the Point Edwards site could result in some impact upon the business activity in the downtown core. The extent of this potential impact is unknown, and would largely depend on the behavior of ferry users. As most ferry users arrive in a vehicle, the opportunity to continue to frequent downtown businesses would not change substantially. It is likely that any current walk-up business associated with the ferry users would be lost if the terminal is located at Point Edwards.

**Comment 7:**

The use of the Point Edwards site would tend to stretch the commercial zone of Edmonds from Main Street farther to the south. The city does not need, and probably cannot support, a commercial area of that size. The Mid-Waterfront alternative would keep the commercial zone about the same as it is now.

**Response 7:**

The location of a new multimodal transportation center at Point Edwards need not substantially expand the commercial zone in the City of Edmonds. Ferry users make up a fraction of the total economic activity in the downtown area. Relocation may result in some new business opportunities near the new facility; however, it is unlikely that these would be a substantial threat to the downtown core. Most ferry users are simply passing through the area on their way to a final destination. Thus, it is unlikely that a Point Edwards facility would substantially shift or extend the commercial focus in Edmonds.

**Comment 8:**

The breakwater and the pilings required at Point Edwards would create new hazards for the salmon, in addition to the shading caused by the pier itself, and cause a change in the currents and the movement of sediments along the coastline.

**Response 8:**

Open-spaced pilings do not substantially restrict the movement of sand. There are examples of many pile-supported structures, such as the old pier at West Point, where transport of beach sediments was not affected in any discernible manner. Waves easily transport sand around the pilings, as successive waves pass between the pilings.

Also refer to response 2 to the letter from the Edmonds Laebugten Salmon Chapter (page 8-4).

**Comment 9:**

Why must the vehicle parking be immediately adjacent to the terminal and why must it all be in one place? What is the possibility of having several smaller parking facilities with a shuttle service? It would make the footprint of the center smaller and would relieve some of the congestion at the one area.

**Response 9:**

Transfers between different transportation modes and even between routes have been shown to discourage patronage. For this reason, every effort is made to make transfers “seamless” and convenient. Parking remote from the commuter rail station would have a definite adverse impact on ridership. The travel market, which is the focus of the commuter rail service, is often described as a “choice” market. The rail service is intended to be attractive enough to lure commuters away from single-occupancy vehicle commuting. An inconvenient remote parking access station plan would not be very effective with commuters in the “choice” travel market. Parking locations remote from the ferry terminal would also adversely impact patronage, but probably to a lesser extent, recognizing that most of these parkers are “captive” rider commuters. Failure to provide a reasonable amount of convenient parking near the ferry terminal would also increase the risk of adverse parking impacts on the Waterfront and Downtown. An argument could be made that inconvenient remote parking would encourage use of public transit (shuttle bus) as an access mode to the ferry. This type of service is quite costly. In addition, remote “satellite” parking lots would have their own set of impacts on traffic circulation and surrounding properties and, for these reasons, remote lots themselves are difficult to site.

**Comment 10:**

No provision has been made for the many terminal users who will be coming from the north. These travelers would be forced to still wind their way through various residential areas to the waterfront. This impact could be lessened by the use of satellite parking lots, with fewer shuttle buses than cars.

**Response 10:**

The “Off-Site Traffic Analysis,” presented in Appendix B, provides forecast multimodal transportation center and ferry traffic volumes and routes to and from the north, and the impacts of this traffic.

**Comment 11:**

Is the need for the people mover due to the length of the Point Edwards alternative or just because it is new and fascinating technology? The people mover appears to be a fad and not an essential part of the terminal.

**Response 11:**

The people-mover was considered necessary to facilitate the movement of walk-on passengers between the multimodal center and the walk-in passenger waiting area of the end of the ferry pier. An 8-minute walk was not considered reasonable, especially for individuals with ambulatory difficulties. The length of the ferry pier has been shortened by 600 feet in the Modified Alternative 2, lessening the average walk to approximately 6 minutes. The people-mover has been replaced with an enclosed weather-protected walkway. Small carts similar to these used at airports would be available to transport persons unable to walk to the ferries.

**Comment 12:**

The need to have the Coast Guard enforce a no-fishing zone along the ferry pathway would add costs to their budget and result in another layer of regulation. And buying the tribal fishing rights would be very expensive.

**Response 12:**

The Coast Guard enforces a 0.5-mile-wide buffer zone along the ferry route and requires that all gear be removed from the VTS lanes 15 minutes in advance of a deep draft vessel. This policy would not change with the relocation of the ferry terminal, and thus no added costs would accrue as a result of the change.

There are not plans to buy tribal fishing rights. As a result of an extensive coordination and consultation process with potentially affected Native American Tribes (Suquamish, Tulalip, Lummi, and Swinomish), the proposed ferry pier at Point Edwards has been realigned such that the ferries would operate along the north side of the SMA 9/10 boundary, thus avoiding direct impact to fishing activities within SMA 10. The dialogue between tribal and WSF representatives are continuing regarding appropriate mitigation measures. The intent is that the agreed-upon measures will be included in a Memorandum of Agreement among all parties (see Section 4.15, Tribal Fishing, in the Final EIS for measures under consideration).

**Comment 13:**

What provisions have been made to encourage less use of automobiles and more use of non-traditional modes? The private passenger car has been given the greatest share of the improvements. What thought has been given to passenger-only ferries?

What about smaller ferries at off-peak periods? What about HOV lanes which get loaded first? What model was used to predict the increased trip utility of this ferry?

**Response 13:**

The multimodal transportation center has been designed to enhance the ability of travelers to use multiple transportation opportunities. Parking is provided within the facility to encourage commuters to leave their vehicles at the terminal. The integration of transit, rail passenger service, pedestrian, bicycle, and ferry options in one location encourages the use of alternative modes of travel.

Passenger-only ferries are being considered to serve the cross-Sound corridors that have the high travel demand to support this service. Although the ferries operating on the Edmonds-to-Kingston route are referred to as auto ferries, they have a virtually unlimited seating capacity (2,000+) for passenger walk-ons. Therefore, the existing service can already handle walk-on passengers without the need for additional passenger-only service. For passengers heading southbound for downtown Seattle or northbound for Everett, the eventual implementation of the commuter rail station at the multimodal center would provide a means for accessing these communities without the use of the automobile.

The Washington State Legislature has considered providing funding for passenger-only ferry service between Kingston and Seattle. Passenger-only service is currently provided from Bremerton and Vashon Island to Seattle.

Use of smaller alternative vessels is severely constrained by the financial capability of Washington State Ferries to acquire and operate such vessels. Although smaller vessels do have marginally lower operating costs per hour when used on a full-time basis, their operational costs per hour would be more than a larger ferry if they are only used on a part time basis. Using smaller vessels for off peak hours would essentially require WSF to double up on the number for vessels operating on the Edmonds-to-Kingston route and would not be cost effective. The WSF long-range plan does consider smaller alternative ferry vessels to serve routes where their use is practical. The Edmonds-Kingston run is not considered practical for the use of alternative vessels due to the short crossing involved.

The WSF facility operational plan prioritizes HOV vehicles for handling and loading. Special HOV bypass lanes have been provided in the design of both build alternatives.

Regarding modeling the increased trip utility of this ferry, the project would not directly affect the number or size of vessels used to serve this route. The primary effect of the project would be to enhance the ability of users to access alternative modes of travel.

**Comment 14:**

Because there will be conflicts between rail traffic and vehicular traffic into the foreseeable future, the use of the present terminal as part of the new terminal would seem to be good use of already impacted land.

**Response 14:**

Conflicts between rail and traffic is only true for the No Action alternative. The purpose of this project is to eliminate such conflicts. Each of the build alternatives considered in the Final EIS provides for grade separation between the ferry access lanes and the railroad. Similar grade separation at the existing Main Street terminal is considered impractical.

**Comment 15:**

The greatest problem with encouraging intermodal trips is the lack of bus service to the area. The Community Transit service needs to be better coordinated with the other transportation modes.

**Response 15:**

Washington State Ferries intends to work with Community Transit to ensure coordinated schedules. Plans to improve WSF service to 30-minute frequencies should provide better opportunities in the future to attempt schedule coordination. Kitsap Transit's vanpool and ridesharing programs are also important. During the course of this project, the concept of facilitating onboard ferry transfers between vanpools to improve matching of origins and destinations has been discussed. This concept will continue to be evaluated.

**Geoffrey Scotton and Debbie Kinzel, 11301 Makah Road, Woodway, WA**

**Comment 1:**

Based on a projected ten-fold increase in traffic along Pine Street (and an even greater increase in truck traffic), properties adjacent to Pine Street (including the commenters) would experience substantial noise impacts over existing conditions. These properties were not specifically addressed for mitigation in the Draft EIS.

**Response 1:**

The noise analysis conducted for the project has taken into account the noise from all vehicles, including trucks, at representative noise-sensitive locations in the vicinity of the SR 104/Pine Street intersection. At the backyard location of the residence at 11301 Makah Road, existing average daytime background noise level is near 52 dBA. Noise level calculations, without taking the possible shielding effects of vegetation and trees into account, indicate that future (2030) average traffic noise level at this location would be approximately 59 dBA during peak-hour traffic conditions. This noise level is well below the FHWA noise abatement criteria and does not exceed existing noise levels "substantially" (by 10 dBA or more). Therefore, no noise mitigation measures are recommended for these areas.

**Comment 2:**

Will the additional lanes along Pine Street be on the east, west, or both sides of the existing roadway? Will the additional lanes require encroachment into adjacent residential properties?

**Response 2:**

Under Modified Alternative 2, Pine Street west of SR 104 would be widened to the south due to the topography and the close proximity of the fish hatchery to the north. The details of the roadway widening design would be worked out in a later phase of the project. It is envisioned, however, that the new roadway could be developed within the existing right-of-way with only a minimal encroachment onto adjacent private property possible.

**Comment 3:**

Is there a plan to “straighten out” the existing turn from the existing SR 104 onto Pine Street and, if so, will such a plan encroach upon adjacent residential property?

**Response 3:**

The environmental documentation only examines the expansion of the intersection by adding more lanes; it does not consider straightening the turn. Furthermore, the traffic analysis does not indicate a need for expanding the intersection any farther than what is already proposed.

**Comment 4:**

I am concerned that rerouting ferry traffic via Pine Street under either alternative would substantially impact the quality of life and resulting resale value of properties immediately adjacent to Pine Street. What mitigation can be provided for these properties?

**Response 4:**

The existing SR 104/Pine Street intersection would be reconfigured as part of the project and would become the primary access/egress to and from the ferry terminal (both build alternatives) and multimodal center (Modified Alternative 2). As a result, there would be an increase in traffic along the access roadway. However, the traffic noise analysis indicates that predicted future (2030) peak-hour traffic noise levels at exterior locations within the residential area southwest of the SR 104/Pine Street intersection would be approximately 59 dBA. While this would represent an increase of 7 dBA, it would not constitute a "substantial" increase of 10 dBA or more, and the resulting noise level would be well below the FHWA noise abatement criteria of 67 dBA. As a result, no mitigation measures are considered warranted at this time. As design for the project progresses, however, further measures to minimize possible impacts will be considered.

Concern has been expressed by the Woodway residents that ferry travelers would use local streets to access the proposed facility, and thus affect the quality of life and safety of that community. Please see comment and response 4 in Section 10.2.3, "Other Comments Received (Anonymous)," (page 10-19).

**C. Edward Simons, M.D., 22300 Woodway Park Road, Woodway, WA**

**Comment 1:**

The state should seriously consider the Point Wells Chevron site as a far more suitable site for a multimodal transportation facility.

**Response 1:**

Refer to response 6 to Joseph Dray (page 8-21).

**Bonnie Storm, 22910 90th Avenue West, Apartment C-20, Edmonds, WA**

**Comment 1:**

The alternatives do not warrant any further destruction of the surrounding environment—easily accessible public beaches, freshwater-saltwater marshes, wildlife corridors, and Willow Creek.

**Response 1:**

Comment acknowledged.

**Comment 2:**

Offer other alternatives, such as keeping the ferry terminal where it is now—enlarge it, build an overpass over the railroad tracks, provide two-story parking in existing paved areas, make two-story holding lanes. Build up, not out.

**Response 2:**

Each of the alternatives suggested has been explored and found to be fatally flawed or not to meet the project goals and objectives, as well as the alternatives analyzed in the EIS. Refer to Sections 2.4 and 2.5 of Chapter 2 of the Final EIS for the full range of alternatives that have been considered and evaluated.

**Kari Thompson and Walter Thompson, 720 Spruce Street, Edmonds, WA**

**Comment 1:**

The Draft EIS does not address the environmental impacts on the Edmonds Marsh. The Draft EIS concludes that the impact will be minimal without any supporting evidence. Thus, the Draft EIS, at least with respect to the wetlands, fails.

**Response 1:**

In response to public and agency comment on the Draft EIS, the Point Edwards alternative has been modified to avoid the 0.15-acre impact to the Edmonds Marsh associated with the bus lane adjacent to the BNSFRR (see Section 4.8, Wetlands, of the Final EIS). Because there would be no direct impact to wetland area, all impacts

are indirect, related to increased human presence in the project area. These indirect impacts are described in Section 4.8, Wetlands, and Section 4.9, Vegetation, Fish, and Wildlife, of the Final EIS.

**Comment 2:**

The Draft EIS does not address the impact on:

- lost fish, bird, and plant habitat
- altered currents along the shoreline due to ferry pier construction
- further division of already disrupted wildlife corridors
- increased stormwater flows from the proposed seven lane access road and parking area
- native juvenile salmonids using Willow Creek
- decreased fish access and velocity barriers posed by an additional 400 feet of culverted stream

**Response 2:**

With respect to impacts to fish, birds, and plant habitat, see response 1 above.

Regarding shoreline currents, refer to response 2 to Edmonds Laebugten Salmon Chapter (page 8-4).

Vegetation and wildlife habitat losses are described in Section 4.9, Vegetation, Fish, and Wildlife, of the Final EIS; it includes Table 4-10 listing habitat losses. Also refer to response 2 to comments from Jeffrey Fisher (page 8-22).

The Draft EIS included a relatively detailed discussion of the effects of increased areas of impervious surfaces on the UNOCAL site on surface runoff patterns (see Section 4.6, Waterways and Hydrological Systems, of the Final EIS). The analysis included quantification of peak flow rates that would drain off from the developed site, and comparison to flow rates in Willow Creek. The Final EIS includes additional details on mitigation measures that would be taken to offset minor impacts of the increased impervious surface area, and other measures that could be taken to further reduce impacts.

The salmon run in Willow Creek is a hatchery run; this is not a wild run. The cutthroat trout present are wild, however, and would benefit from the proposed improvements to Willow Creek. Refer to response 3 to the letter from the Brackett's Landing Foundation for a discussion of the improvements to Willow Creek, as well as Section 4.9, Vegetation, Fish, and Wildlife, of the Final EIS. Also refer to response 7 to the letter from Jeffrey Fisher (page 8-24).

**Tom Warek, 255 NE Evans Lane, Poulsbo, WA**

**Comment 1:**

Would like to see this project. It would make it easier to commute without having to take a vehicle onto the ferry.

**Response 1:**

Comment acknowledged.

**Steve Weagant, 5665 NE Lincoln Road E., Poulsbo, WA**

**Comment 1:**

The Point Edwards alternative would be a great improvement. Make sure that there is ample off-street parking for walk-on commuters.

**Response 1:**

Modified Alternative 2 would include a two-level, 460-space parking garage to accommodate primarily park-and-ride commuters (either for the ferry, rail, or transit); Alternative 3 would include a two-level, 490-space parking garage for short-term and park-and-ride commuters.

**Kris Webb, 920 Dayton Street, Edmonds, WA**

**Comment 1:**

Unless a fourth alternative can be identified that does not affect city parks and wildlife, FHWA, WSDOT, and the City of Edmonds should think about permanently ending the Edmonds-Kingston ferry run.

**Response 1:**

Permanently ending the operation of the Edmonds-Kingston ferry run is not a practical alternative. This route serves regional travel demands as described in Chapter 1, Purpose of and Need and Need for the Action, of the Final EIS. The run could not be terminated without major impact to a large portion of the traveling public.

**Comment 2:**

There is no reason to build a ferry terminal and multimodal center that will damage a Category 1 wetland and wildlife sanctuary.

**Response 2:**

The Point Edwards alternative has been modified to avoid impacts to the western edge of the Edmonds Marsh. The design of the project alternatives incorporates many innovative ideas to minimize intrusion into the natural habitats in the project vicinity. The possible effects of the project will continue to be studied in the further

design stages, and will meet or exceed all permitting conditions prior to and during construction.

**Comment 3:**

Why can this project be built near bald eagles while loggers are not allowed to cut trees within a certain distance of a bald eagle nest?

**Response 3:**

There are no bald eagle nests located within 1.6 kilometers (1 mile) of the project site. The effects of the project on bald eagles and other listed species were examined in the Biological Assessment prepared for this project in accordance with the Endangered Species Act (CH2M HILL, 2003). The conclusion of this analysis is that the project is “not likely to adversely affect” bald eagle.

**Margaret Weidner, Ph.D., 15726 160th Avenue NE, Woodinville, WA**

**Comment 1:**

The access road completely ignores the presence of 17 pairs of great blue heron that have made the trees their nesting site. Failure to take this into account would seriously damage the wildlife refuge.

**Response 1:**

Refer to response 2 to Frances Murphy (page 8-38).

**Comment 2:**

The protection of the salmon hatchery isn't taken into account in the Draft EIS.

**Response 2:**

A number of design elements included in Modified Alternative 2 would improve salmon passage to the hatchery. For example, the food supply for salmon smolts would improve as the salt marsh function of Edmonds Marsh returns. The proposed project would also include the restoration of riparian vegetation to the extent possible along the lower reaches of the stream and the improvement of the hatchery water supply.

**Comment 3:**

The Draft EIS does not adequately consider the increased stormwater runoff.

**Response 3:**

The Draft EIS included a relatively detailed discussion of the expected increase in peak flows and volumes of stormwater runoff under Alternatives 2 and 3 (see pages 4-23 and 4-25 of the Draft EIS). Section 4.6, Waterways and Hydrological Systems, of the Final EIS includes more details on what would be done to mitigate for minor increases in runoff flow rates and volumes.

**Comment 4:**

New tracks should be placed on the western side of the existing tracks—where BNSFRR legally has right-of-way. BNSFRR has no right-of-way farther east of where it is now.

**Response 4:**

Determining the location of the additional railroad track is not part of this project. Sound Transit is considering various options for placement of an additional track in a separate project related to the Commuter Rail program. The location of the tracks depicted in the Draft EIS was based upon input from the railroad. The project can accept revisions to the rail alignment without substantial changes in design concepts.

SEA31009908190.doc/043010029

RE: Response to Draft Environmental Impact Statement: SR 104, Edmonds Crossing

To: Mr Dale Morimoto  
Environmental and Special Services Manager, MS 138  
Washington State Department of Transportation

From: Greg Beach  
9412 217th St. S.W.  
Edmonds, Wa. 98020

I am writing in response to the Draft Environmental Impact Statement: SR104 crossing. I am a current resident of Edmonds, and a commuter to downtown Seattle. I am aware and in favor of any transportation centers that will help link outlying areas to the downtown area. But I am not in favor of any changes that will put wetlands in jeopardy. It seems that everyone wants to have and enjoy wildlife and wetlands, but they are the first to go when changes are made or proposed. I have several concerns with the proposed changes.

Proposal #1

- ① A) Not enough creativity or effort was used in trying to expand the existing site.

Proposal #2 & #3

- ② A) Proposed removal of 5 acres of wetlands for parking garages or roadways. The wetlands are currently home for Bald Eagles, Coho smolt and hundreds of species of wildlife. The Bald Eagle is currently an endangered species and it wont be long until the Coho salmon will be endangered, if there are no wetlands. The wetlands are the largest of its kind in the Puget Sound region. The Coho smolt use the wetlands as a home for up to 1 year prior to returning to the salt water. The wetlands have already been cut by 50% for businesses that can barely make it.

- ③ B) Proposed addition of 400 ft to the willow creek culvert. The creek is already hampered by the existing culvert that is currently used. Coho salmon have a hard enough time making it back to th Deer Creek Hatchery as it is now. The additional length of culvert will make the drainage go quicker, but makes the water too swift for any fish that are trying to stay in the wetlands. A solution to the culvert is to day light the stream so the stream is visable to commuters and makes it easier for salmon to return to the wetlands for spawning.

The overall idea of a transportaton center in edmonds is a good one, but I feel that there needs to be some better plans that have less impact to the environment. The easiest or cheapest way is not always best. Please consider and evaluate the existing site for future expansion.

Thank you,

Greg Beach

APR 29 '98

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23821-115 Place West  
Edmonds, WA 98020  
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Mr. Dale Morimoto  
Environment and Special Services Manager  
WSDOT -MS 138  
PO Box 330310  
Seattle, WA 98133-9710

SUBJECT: Comments on DEIS for the Edmonds Crossing Project

Dear Mr. Morimoto:

I am writing in regard to potential long range impacts on the Edmonds Marsh as cited in the DEIS. The DEIS, on page S-27, refers to a potential change in the marsh hydrologic regime because of increased water runoff from impervious surfaces and roadways. This runoff could change the amount of surface water and sedimentation reaching the wetlands, potentially affecting the functions and volumes of surface water within the wetland areas. The report goes on to state that alteration of the saltwater input to the Edmonds Marsh could change the species composition within the marsh.

① The saline characteristics of the Edmonds Marsh are particularly important to the value of the marsh. This has been documented numerous times over the years. The salinity was originally documented in approximately 1973. At that time, the Marsh was included in the Edmonds Shoreline Master Program because of its saline characteristics and the fact that it could be documented as an associated wetland to Puget Sound.

Over the years a number of studies were carried out to determine the health of the Marsh and how it could most effectively be protected. These studies, performed with monies made available through Washington State Coastal Zone Management grants, documented the critical need to maintain a flow of saltwater into the marsh. In fact, at one time it was recommended that some of the cattails and other freshwater plants be removed and the amount of saltwater influx be increased. These studies are all available in the Edmonds Planning Department.

① continued I hope that the information in these studies is carefully reviewed and that all possible steps are taken to maintain the health of this irreplaceable resource. If you have any questions, please contact me at (425) 388-3945.

Thank you for the opportunity to comment on this DEIS for the Edmonds Crossing Project.

Sincerely,



Mary Lou Block

# EDMONDS CROSSING

Connecting ferries, bus & rail

## COMMENT SHEET

We are very interested in hearing your comments on this project. You may return this sheet today or take it with you to fill out later. If you wish to mail in your comments, please send this sheet to the address listed below. Comments are requested to be postmarked before April 27, 1998 to be considered in finalizing the Environmental Impact Statement and design documents.

### COMMENTS:

① I wanted to thank you for presenting this on the ferry road - it was a great way to get people who will not attend the meeting in Edmonds.

I've also been very curious, so it was extremely informative for me.

Thanks!

(Please print)

Name Danna Brunkey Phone: ( )

Address PO B 11305

City Panbridge 15 State WA Zip 98110

Please return to: Washington State Department of Transportation, Dale Morimoto, Environmental and Special Services Engineer, P.O. Box 330310, MS 138, Seattle, WA 98133-9710

Thank you!

## EDMONDS CROSSING COMMENT SHEET

Dale Morimoto  
 MS 138  
 Environmental and Special Services Manager  
 Washington State Department of Transportation  
 P.O. Box 330310  
 Seattle WA 98133-9710

This is a response to your request for public comment on the Environmental / Design Hearing (4/2/98) for the proposed Edmonds Crossing / SR 104 / Multimodal Transportation Project.

① Like most Edmonds and Woodway residents, I am convinced that the Environmental Impact Statement (EIS) does not fully describe the destructive impact to our community and environment which project Alternatives 2 and 3 present. In particular, the impact to Marina Beach Park is grossly understated in the EIS. The report describes Marina Beach Park as 4.5 acres, "not including the informal use area" south of the pier. This informal use area, discounted and minimized in the report, effectively doubles the useful recreation area, and provides a dog-use area, very rare in the Puget Sound region. Not mentioned in the EIS is the fact that baby seals and other marine mammals often use Marina Beach as a rest/sleep stop on their migrations. Project Alternative 2, the Point Edwards pier, would effectively deny this wildlife and local citizens the use of this vital community resource. This impact, in addition to the salmon impact, wetlands damage, and site cleanup issues acknowledged in the report, make the Point Edwards option totally unacceptable to us. Strong grass-roots opposition will arise when the majority of Edmonds and Woodway citizens become fully aware of the threat to Marina Beach Park by Alternative 2, and to a lesser extent, Alternative 3.

② In addition, the EIS does not fully address the safety issues which Alternative 2 poses to sailboats accessing the Edmonds Marina. Three ferry slips operating from Point Edwards would interfere with this sailboat traffic, increase collision hazards, and diminish the usefulness of the Marina as a recreational facility. For this reason, Alternative 2 gives the impression of a piecemeal, uncoordinated idea, which is not well integrated into the existing facilities and resources. Alternative 3, Mid-Waterfront Site, mitigates this problem somewhat, but it is clear that waterborne congestion would accompany the congestion on land, and degrade the environment and recreational values which make Edmonds and Woodway desirable family communities. The long-term effects of vastly expanded vehicle traffic through the region's neighborhoods is not adequately addressed.

④ The servicing of development interests on Kitsap Peninsula with increased ferry service does not justify this level of habitat destruction and Edmonds / Woodway community degradation. The Edmonds waterfront access problem under the current configuration is greatly exaggerated in the EIS. Currently, waterfront access, via Dayton Street, is not impacted by ferry traffic at all.

⑤ We urge the appropriate State authorities to seriously consider the Point Wells Chevron site, one mile south, as a far more suitable site for a multi-modal transportation facility. This site was not available for consideration during the time of the current study, but recent events make the acquisition of the site a very feasible and attractive alternative to Edmonds-area development. Point Wells multi-modal development would provide far more expandability, with far less environmental and social impact, than any Edmonds site. Point Wells is closer to I-5, has a 4-lane highway in place for access, and offers a shorter water route to Kingston. We strongly recommend its prompt acquisition for development as a multi-modal facility.

Thank you for your attention and consideration in these matters. We will be following these issues carefully, and will actively participate in their discussion and resolution. Thank you.

Joseph P Dray (425) 771-2432  
 21307 Pioneer Way  
 Edmonds, WA 98026-7343

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kind in urbanized Puget Sound. As such, and given that 95% of the city of Edmonds is already developed, it is in the city's best interest to prevent further degradation of the marsh. The loss of 0.5 acres of this marsh habitat along with another 0.2 acres of wetland buffer represents a significant portion of the wetland that was once twice its current size. There are no quantitative estimates provided for how the loss of this wetland acreage will reduce carrying capacity for fish and wildlife. Furthermore, in-kind mitigation has not been addressed adequately. For example, will the current ferry holding lane be removed and reverted back to the wetland it once was if Alternative 2 or 3 are selected?

By itself, the loss of wetland acreage may not appear consequential, however, the construction of the access road will create a substantial physical barrier to wildlife supported by the marsh. The current two lane road probably represents a partial barrier to terrestrial wildlife already, but is still a passable wildlife corridor since there is little traffic on the existing road, and wildlife can bypass the road completely if accessing the marsh from the southwest. Discussion of impacts from this permanent disturbance is inadequate in the DEIS and in-kind mitigation is not proposed. Mitigation should consider the creation of an overpass on the access road so that wildlife can continue to move between upland and wetland habitats available in the vicinity of the marsh.

The Edmonds Marsh serves as a means of naturally regulating and cleansing surface run-off to Puget Sound. It has already been robbed of a substantial quantity of freshwater by the redirection of stormwater through the Dayton Street outfall. The paving proposed in the development of the access road and parking lot for the multi-modal center will result in additional losses of surface drainage to the marsh through their redirection to stormwater outfalls. Impacts from the altered hydrology have not been quantified, nor their potential effects on fish and wildlife resources.

### *Marine Resources*

Alternative 2 would eliminate the use of marina beach for recreation, and result in substantial degradation to the benthic environment. By the building of a breakwater for the Point Edwards terminal, the normal cycle of sediment accretion and erosion along this beach would also be disrupted, and there would be great potential for the beach to erode over time. This erosive potential has not been adequately addressed with quantitative study.

Marina Beach represents the most 'pristine' beach along the Edmonds waterfront. Today (a weekday) at 15:00, the parking lot at the beach was full, and there were at least 50 persons recreating in the area; weekend use is far more substantial. Bissecting the area with a ferry terminal and its associated traffic

5  
continued

will completely destroy the character of the area, and effectively eliminate its use for the public. As a scuba diver, I can attest that Brackett's Landing is usually swarmed with scuba divers; marina beach effectively represents the only beach used to any extent by the non-diving community. The marine areas of Edmonds' waterfront should not only be accessible to those with the financial backing and inclination to own a boat or scuba gear. The loss of Marina Beach would be irreplaceable and non-mitigatable.

### *Fisheries Resources*

6

There is reasonable representation of the fisheries resources inhabiting the project area within the DEIS, however, much of the information presented is not particularly relevant to the habitat affected. Although existing habitat within Willow Creek/Edmonds Marsh may provide suboptimal rearing and spawning habitat for salmonids, that condition is primarily a product of our past stormwater management and urbanization. Yet, significant anadromous fish resources continue to use the marsh, despite the degraded habitat. Because access has been blocked, and habitat upstream has been channelized, the system is not nearly as productive as it could be. With habitat modifications, the system could be restored to meet its natural potential, while at the same time permitting the development of a multi-modal transportation center (read on).

7

Widening of the Pine Street access road to 5 or 6 lanes will necessitate the lengthening of the underlying culvert, creating a permanent velocity barrier to juvenile salmonids, and at least a partial velocity and/or depth barrier to adult salmonids. This barrier will effectively eliminate any rearing and spawning potential in Willow Creek upstream of the culvert. Discussion of velocity barriers to juvenile fish is conspicuously absent in the DEIS, and no adequate mitigation is proposed.

8

Much of the area within the Willow Creek/Edmonds Marsh drainage represents the type of lowland, shallow gradient fluvial and wetland habitat that is favored by coho salmon and cutthroat trout. Historically, (i.e., prior to development) a substantial portion of this drainage was undoubtedly used by wild resident and anadromous salmonids for spawning and rearing. Recent studies demonstrate how tidally-influenced wetlands are used extensively by juvenile coho and chinook for rearing, even when the system is not associated with their natal stream. Juveniles primarily enter such systems at night, especially during high tide (Cal. Fish and Game, 1995). Adding an additional 400 ft of culvert to the lower portion of the creek will further ensure that no juvenile salmonids from outside the system will be able to use the system for rearing or refuge. This

8  
continued

additional 400 ft of culvert will also worsen the passage conditions for adult salmonids that already must swim through 1200 ft of culvert to first enter the Edmonds Marsh/Willow Creek drainage.

9

Given the precarious status of coho stocks in Puget Sound, any incremental loss in habitat can have disproportionate impacts to total stock abundance. Even still, the impact of habitat loss on total stock abundance remains difficult, if not impossible to quantify because so many other factors also play a role in salmonid escapement. In the past we have used this uncertainty of causation to justify urban development and unsupportable harvest rates. We can no longer ignore these incremental impacts, especially when they can be avoided with a little more planning. We need only look to Oregon to understand the impact that habitat loss can have on coastal coho populations; the coastal stock status in that state has necessitated a salmon management plan—their accepted alternative to regulation under the Endangered Species Act (ESA). Locally, Puget Sound coho (not just chinook) are also under scrutiny by the National Marine Fisheries Service for regulation under ESA. This determination will be made within the time-line proposed for the development of the multi-modal center. It is therefore in the best interest of the city, the WSF, and the DOT to fully consider all potential impacts of the proposed Alternatives, and develop appropriate mitigation plans that not only prevent long term impact, but actually improve conditions for the species.

10

To this end, mitigation proposed within the DEIS is inadequate. Only general statements such as, 'sedimentation will be minimized through storm-water management' (not a direct quote) offer little substantive understanding of what will actually be done to benefit the aquatic species impacted by the proposed development. Some mitigation options that should be considered include:

- Remove all or part of the culvert that directs flows from Willow Creek into Puget Sound and create an open, habitat-enhanced stream channel in its place. The intertidal section of such habitat could feasibly be enhanced to support pink salmon, as well as the coho and cutthroat that already use the system. At the very least, the coho and cutthroat that already use the system would be benefited, as would those predatory species that feed on them (e.g., potentially listed Chinook salmon). Such a channel, bisecting the beach, would provide greater habitat diversity and enhance the beauty of the recreational area. Alternatively, the culvert could be removed and the drainage could be directed further south into a culvert underlying the BNRR tracks (this would require a new culvert, but only a short length would be required and the Marina Beach would not be disrupted).

(10)  
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- The Pine St culvert should be replaced with a lighted, bottom-less arch culvert with appropriate habitat structures within it to facilitate fish passage.
- Channelized habitat within Willow Creek should be enhanced with structures favoring fish passage and rearing potential (e.g., log weirs, log vanes). Such habitat modifications are especially needed immediately downstream of the existing Pine St. culvert, an area previously channelized for storm-water management.
- Disruption of wildlife corridors must be recognized and mitigated. This should include the establishment of terrestrial wildlife corridors permitting access to the marsh from the southwest (at the very least).
- All concrete used in construction should be of the porous variety to permit more natural drainage and less alteration to peak flows in Willow Creek.

### Summary

Beyond the biological and cultural impacts from erecting a new terminal at Point Edwards, it simply does not make sense from an engineering or economic perspective. Currents and weather in the area are far greater than at the existing site or at the proposed mid-water site. The site would lie in a zone of high landslide hazard, and the site would significantly disrupt commercial fisheries. Development of the area would potentially expose chemical hazards entrained at the UNOCAL site that have not been fully addressed or identified, and construction could potentially alter groundwater flows, thereby releasing these contaminants to surface waters of Edmonds Marsh and/or Puget Sound. Indeed, the subject of groundwater contamination near the site has not been adequately addressed (only 2 paragraphs in the Affected Environment section). The development of a 5 or 6 lane access road to the ferry would further isolate the Edmonds Marsh, a habitat already encircled by pavement. Thus, the collective hazards to both the environment and the ferry system's users are potentially great. Economically, the plan makes little sense in that people using a site situated at Point Edwards would not be inclined to walk north to downtown or even to shops lining the waterfront.

(11) Given the numerous problems of Alternative 2, Alternative 3 (the mid-waterfront design) is far superior. However, the need for the access road is still unclear. (12) There is already a 5 lane roadway (SR 104) leading to the existing ferry that could

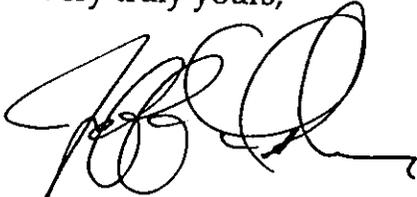
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be utilized for the mid-waterfront site. What will happen with this mass of concrete when the traffic is redirected towards a new 6 lane road? Also, the access road would disrupt the flavor of the existing marina if it was forced to encircle the marsh and parallel the marina, as depicted in the DEIS. Beyond these problems, however, there are some worthy reasons as to why the mid-waterfront site is superior and these have been summarized below.

1. The marine environment will not be disrupted to nearly the extent encountered under Alternative 2.
2. Risks from currents and weather are substantially reduced, thereby minimizing risk of catastrophe.
3. Risks from landslides are minimized under Alternative 3 relative to Alternative 2.
4. There is less permanent loss of wetland, wetland buffer, and upland habitat because the parking area for the multi-modal center will be developed in an area that is already developed.
5. Siting the multi-modal center in the middle of the waterfront will ensure that downtown businesses will continue to get some revenue from the ferry commuters. In addition, the long-range plan to develop the existing ferry pier into a shopping boardwalk would be benefited by the closer proximity to ferry commerce.
- 13 6. As mitigation, the UNOCAL pier could be removed, or (at least) day-lighted. Under alternative 3 there is no statement for mitigation following the construction of another over-water structure.
- 14 7. Ferry conflicts with the existing fishing pier (e.g., scouring) could be resolved by either moving the fishing pier (perhaps the UNOCAL pier could be modified into a fishing pier), or by erecting a breakwater (similar to the design proposed under Alternative 2).
8. Much of the necessary mitigation proposed in the preceding section on Fisheries Resources would prove unnecessary.

I appreciate the opportunity to respond to the proposed plans for the multi-modal center outlined in the DEIS. While I recognize the need for increased efficiency of the Edmonds/Kingston ferry system, I am not convinced that either existing facilities or a mid-water site cannot be adequately developed to provide the necessary service for transportation at the same or less cost than would be encountered through the development of a ferry pier at Point Edwards. I suspect that the majority of persons who would read the DEIS would agree.

Very truly yours,



Jeffrey P. Fisher, Ph.D.

19308 88<sup>th</sup> Ave. W.  
Edmonds, WA 98026

Reference cited:

Final Performance Report: Federal Aid in Sport Fish Restoration Act, Project F-51-R, Project # 32, Job No. 7, "Habitat type utilization of juvenile salmonids in the Klamath River estuary," California Department of Fish and Game, September 26, 1995.

April 27, 1998

Dr. Dale Morimoto  
Environmental and Special Services Manager, MS138  
Washington State Department of Transportation  
P.O. Box 330310

Dear Mr Morimoto,

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We are resident of Edmonds City and very upset about what you are proposing to do.

- ① Our little town in already crowded with automobiles. Just think of what 50K more cars will do the the roads and the atmosphere. We are a family that has ashemia. This would put us in danger. The traffic would be horrible, even if you build a 7 or 8 lane
- ② highway. What will happen to the people who have business in an around the City of Edmonds. some would be put out of business. What about the property. You would
- ③ have take great chunks out the peoples property to build a highway this large. We didn't move to Edmonds to have our lifestyle changed so abruptly. We came here for the quietness and low buildings and the atmosphere. Please reconsider this project that you are attempting. Leave our town small and unassuming. Leave us in peace and tranquility.

Thank you for listening to my plea and considering what we small people of Edmonds think about this idea. Most everyone we have talked to say the same thing. where this they get the idea we wanted this. **No say the people of Edmonds loud and clear.**

*Don Hall*  
Don Hall  
425 776 9775

APR 29 1998

# EDMONDS CROSSING



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## COMMENT SHEET

We are very interested in hearing your comments on this project. You may return this sheet today or take it with you to fill out later. If you wish to mail in your comments, please send this sheet to the address listed below. Comments are requested to be postmarked before April 27, 1998 to be considered in finalizing the Environmental Impact Statement and design documents.

### COMMENTS:

① An additional option for the Pine St./Hwy 104 intersection should be considered - no traffic to or from Hwy 104 via Pine St. There are numerous other access points for downtown Edmonds & this option would facilitate traffic flow on '04. The base option is unacceptable in that it would allow the continuation of the currently intolerable use of a narrow residential street as a state highway. The plan also does not address

② how the noise from increasing traffic on Hwy 104 will be mitigated for residents south of Pine & west of 3rd Ave. The plan did not recognize that the change of Hwy 104/Pine St intersection will change the way vehicles are operating i.e. increasing noise due to starting/stopping at intersection. Consequently, the DOT needs to incorporate noise reduction barriers along Hwy 104 in order to mitigate this adverse impact

(Please print)

Name BRAD HANSON Phone: (206) 526-4035

Address 210 PINE ST

City EDMONDS State WA Zip 98020

Please return to: Washington State Department of Transportation, Dale Morimoto, Environmental and Special Services Engineer, P.O. Box 330310, MS 138, Seattle, WA 98133-9710

Thank you!









# EDMONDS CROSSING

Connecting ferries, bus & rail

## COMMENT SHEET

We are very interested in hearing your comments on this project. You may return this sheet today or take it with you to fill out later. If you wish to mail in your comments, please send this sheet to the address listed below. Comments are requested to be postmarked before April 27, 1998 to be considered in finalizing the Environmental Impact Statement and design documents.

### COMMENTS:

① Your preferred site look great  
Looking forward to you moving on.  
you have my support.

(Please print)

Name Ken Masironi Phone: (360) 479-4491  
Address 5505 KAYSAP WAY  
City Bremerton State WA Zip 98512

Please return to: Washington State Department of Transportation, Dale Morimoto,  
Environmental and Special Services Engineer, P.O. Box 330310, MS 138, Seattle, WA  
98133-9710

Thank you!

Edward J. McMorrow

Edmonds WA 98020

1024 4th Ave. S.

Mr. Dale Morimoto, Environmental and Special Services Mngr.  
Washington State Dept. of Transportation  
P.O. Box 330310 MS 138  
Seattle WA 98133-9710

April 5, 1998

Dear Mr. Morimoto:

I attended the Environmental Impact Statement/Design Hearing in Edmonds held April 2 1998. I had read a copy of the Draft Environmental Impact Statement (DEIS) prior to attending.

The draft DEIS is seriously flawed even negligently so in that no discussion of the future carrying capacity of the Edmonds-Kingston ferry run is addressed. By my count it would be possible to put up to nine auto ferries on the run with a triple slip dock in Edmonds and adding one additional slip to Kingston. A run of this size is very possible due to the very realistic future residential development by the Pope Resources Company of its' Port Gamble real estate holdings. Pope has the capital to put in a sewage treatment system that would allow the suburban development of the entire North Kitsap Peninsula. This development will be economically feasible only if the auto carrying capacity of the Edmonds-Kingston route can be significantly scaled up in the near future.

The Draft DEIS does not adequately characterise or quantize the traffic safety conditions of both alternatives 1 and 2 over time as auto ferry capacity is raised on the run. Specifically:

It does not address how many new residents would live in northern Kitsap County once it was certain the auto carrying capacity of the Edmonds/Kingston run could grow over time.

It does not address how vehicles seeking to travel a northerly route out of Edmonds will be routed and the impacts this will have on Edmonds residents.

It does not address how the increased auto traffic on eastbound SR 104 and auto traveling a northerly route will impact Edmonds residents.

It does not address the impact on real estate values in Edmonds from increased auto traffic.

It does not address the impact of increased auto traffic on the delivery of safety services to residents along the roads serving auto ferry travelers.

I have included a second page which contains a fourth possible alternative that would better meet the needs of the long term interests and needs of Edmonds.

Thank you for your time. Sincerely,

*Edward J. McMorrow*  
Edward J. McMorrow

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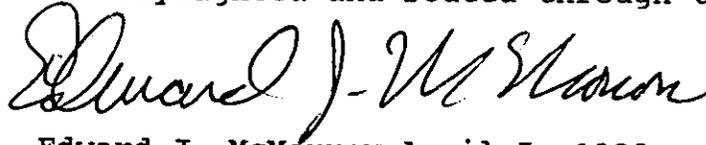
EDMONDS CROSSING SR104

PROPOSED ALTERNATIVE 4: Combine elements of alternative 1 and alternative 3. This proposal would not; build a new multi slip ferry dock, a rail overpass, a Dayton street underpass, or realign SR104 and Admiral Way. The multimodal transportation center would be located as in alternative 3 except the preferred possibility of shifting the location closer to main street should be investigated. The people mover sidewalk would have a feature that automatically halted operation when trains were crossing Main Street.

Build a bicycle "freeway" from Everett to Seattle along the Railroad right of way. It would probably be best if it was located between the tracks and the bluff.

Widen Main street from the Sunset avenue to 7th avenue or so, change the zoning east along Main street from 3rd avenue to 7th avenue or so to allow 5 to 6 story buildings of steel reinforced concrete. Zone this so there is retail on the street level with residential above. The upper storys would be set back another 10 feet from the street facade so as to keep an open feel to the street.

Acquire the UNOCAL property by the City of Edmonds and convert it to a park with a pedestrian and bicycle connection to the City park. It would be possible to use some of the lower area for baseball and soccer. Investgate if the outflow from the marsh could be daylighted and routed through the south part of Marina Beach Park.



Prepared and submitted by; Edward J. McMorrow April 5, 1998  
1024 4th Avenue South  
Edmonds WA, 98020

RECEIVED

JUL - 9 1998

COMMUNITY SERVICES  
DIRECTOR

RECEIVED

JUL 08 1998

OFFICE OF THE MAYOR

TO: Mayor Fahey and the city council

July 8 1998

FROM: Edward J. McMorrow  
1024 Fourth Avenue South  
Edmonds WA 98020

Dear Mayor Fahey;

Thank you for taking the time to talk briefly with me after the council meeting adjourned last night.

The point that I want to make clear to you is that the construction of a multi slip auto ferry dock in Edmonds will lead to reduced growth in property values in much of Edmonds because of the dramatic increase in commuters from the urbanization of the northern Kitsap county that will follow it's construction.

The easiest way I can think to visualize this is to consider Edmonds without an auto ferry. Without an auto ferry a few of the things we could have are:

- a new commuter train and bus station just off main street.
- an opportunity to convert the Unocal site to parkland.
- a healthier waterfront and wetland ecology
- a quieter bowl area

I am well aware of the negative points regarding the present location of the ferry dock. Moving it would solve some of those. The draft EIS statement spoke glowingly of the improvement to traffic congestion at SR104 and Pine, Dayton and Main street, however it said nary a word about how much of an increase in traffic the multi slip dock will allow over the long term and how that traffic will affect the rest of Edmonds. I see nothing but long term negative effects for the community of Edmonds as thousands of new commuters try to drive daily through Edmonds to work, spoiling our wonderful place to live in the process.

My feeling is that any changes to the infrastructure of Edmonds are not worth doing if they don't add value. More cars coming through Edmonds devalues our quality of life and minimizes our property values compared to communities not so afflicted. The slogan is "come to Edmonds, not just through Edmonds".

I look forward to your prompt reply. I will close by saying I am very impressed with how well the council meetings are run and was most impressed with the patience shown while listening to the glib and glowing future the cable guy is always promising, yet I never hear him guarantee when this future is going to arrive. Have a good trip to Japan it is usually quite sweaty there this time of year. Sincerely



Edward J. McMorrow

# EDMONDS CROSSING

Connecting ferries, bus & rail

## COMMENT SHEET

We are very interested in hearing your comments on this project. You may return this sheet today or take it with you to fill out later. If you wish to mail in your comments, please send this sheet to the address listed below. Comments are requested to be postmarked before April 27, 1998 to be considered in finalizing the Environmental Impact Statement and design documents.

### COMMENTS:

① 1. What provisions will be made to get south bound ferry traffic on Hwy 99 on to 104 west bound and also to get east bound traffic on SR 104 onto Hwy 99 north bound. Without such arrangement southbound ferry traffic will be forced onto 238 SW which has a low speed limit or will force such traffic to continue using 196 SW, Puget Drive, 9th Ave, Cuspers and 3rd Ave to Pine St.

② 2. The new bridge over the railroad and out to the ferries will be quite high crossing the beach at the south edge of Marina Park. Columns that support the bridge should be as far apart as possible to allow full access to all parts of the beach, if at all possible

(Please print)

Name Larry Menue Phone: (425) 776-2618  
Address 22102-98 Ave. W.  
City EDMONDS State WA Zip 98020

Please return to: Washington State Department of Transportation, Dale Morimoto,  
Environmental and Special Services Engineer, P.O. Box 330310, MS 138, Seattle, WA  
98133-9710

Thank you!

✓

# EDMONDS CROSSING



Connecting ferries, bus & rail

## COMMENT SHEET

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### COMMENTS:

Looks good!

① Especially nice to see  
integration of bus & rail.

(Please print)

Name D. A. MINOTT Phone: ( )

Address 3740 E. John St.

City Seattle State WA Zip 98112

Please return to: Washington State Department of Transportation, Dale Morimoto,  
Environmental and Special Services Engineer, P.O. Box 330310, MS 138, Seattle, WA  
98133-9710

Thank you!

April 6, 1998  
Poulsbo, WA.

Mr. Dale Morimoto  
Environmental & Special Services Mgr.  
MS 138,  
Washington State Dept. of Transportation  
P.O. Box 330310  
Seattle, WA 98133-9710

APR 7 '98			
DATE RECEIVED			
TO:	DISTRIBUTION	INIT.	DATE
<input checked="" type="checkbox"/>	ENV. PROG. MGR.		
<input checked="" type="checkbox"/>	AIR & NOISE		
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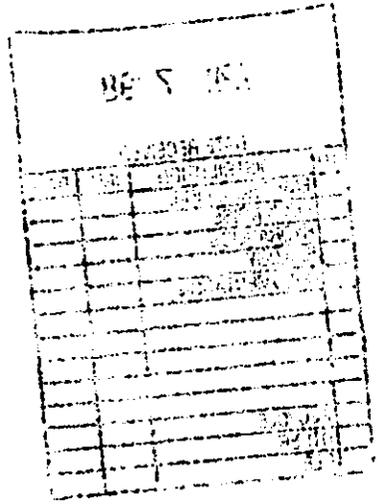
Dear Sir:

I am a frequent rider of the Edmonds Ferry and have been for many years. Upon review of the recent "Times" article about the new Edmonds Ferry terminal, I would like to offer for your consideration another siting option:

1. After tank removal on the hill, build a multi-level parking garage into the hill with a low profile. (The tank soil may have to be removed anyway due to environmental concerns and contamination). This could <sup>save</sup> costs of building a separate two-level parking garage in the wetlands area and mitigate those environmental concerns.
2. A parking/holding area consolidated facility incorporated into the hillside could be functional and aesthetically pleasing to adjacent residents and those with a city territorial view. It would also accommodate the separate functions of providing parking and

overflows for the ferry holding area.

Sincerely yours,  
*Robert J. Monks*  
Robert J. MONKS PE  
16100 Pearson Rd NE  
Poulsbo, WA 98370  
360-779-3538



*[Faint, illegible handwritten text, likely bleed-through from the reverse side of the page.]*

Comments pm SR 104 Edmonds Crossing- April 27, 1998

The Edmonds Saltwater Marsh, located immediately north of the UNOCAL site at Point Edwards, is the largest saltwater marsh in this region as well as one of only 120 saltwater marshes left on the West Coast. This Marsh has been subjected to ongoing cumulative insult by human invasion that has reduced its size and denegated its importance to our region. That was in the past when we didn't know any better. But, just as we are beginning to understand Nature's use of this marsh for the benefit of our community, the SR 104 Edmonds Crossing E.I. S. enters the picture in the Environmental Impact Statement issued by the Washington State Department of Transportation. The Marsh will be needlessly impacted and possibly destroyed. This thoughtless planning will probably result in its destruction by ignorance.

① The Hill evaluation of the project (titled Edmonds Crossing SR104) is lacking any actual evaluation of the impact on the Marsh, its bird, mammal or fish population. It is the position of Brackett's Landing Foundation that NOT ONE SPOON OF DIRT WILL BE ALLOWED TO FILL IN ANY PART OF THIS MARSH. The Department of Transportation has a very important project in the Multimodal Project. It is vital to the welfare of our region. BUT the project need not destroy every quality aspect of our local community life in the process of providing transportation for our residents and neighbors.

② Removing any of the trees along the southern boundary of the Marsh will destroy a priceless rookery for great blue herons. Also, the Burlington Northern's right-of-way is along the east side of the present railroad tracks. The Burlington Northern has NO LEGAL RIGHT to fill in ANY of the Marsh on the western edge of the Marsh. The Department of Transportation is proposing an illegal proposition in its EIS to by advocating the filling in of the wetland FOR A SECOND SET OF TRACKS FOR BURLINGTON NORTHERN THAT IS NOT ON BURLINGTON NORTHERN'S RIGHT-OF-WAY.

③ The Edmonds Saltwater Marsh is a unique phenomenon, a wildlife refuge right in the midst of downtown Edmonds. Its constant residents- great blue herons, migrating waterbirds, salmon have accepted our human impact thus far. But, the present day Marsh is only half or one third of its original size. Remember that this Marsh serves as the kidney for the Edmonds region. We depend on it to help control storm surface water runoff from increasing impervious surfaces in the community. Like a human's kidney, this organ needs to function for the welfare of the entire body, in this case the Edmonds bowl. The E.I.S. submitted for community appraisal delivered an incomplete impact assessment. The word "mitigation" is tossed in here and there. Can there be ANY "mitigation" offered that would replace our priceless saltwater marsh?

④ Have you considered alternatives? The alternatives referenced in the E.I.S. only refer to proposed locations of the dock, the approach by vehicles, the parking. This is an incomplete assessment. ANY MITIGATION will be incomplete mitigation, because the Edmonds Marsh is IRREPLACEABLE!

Frances Mungley

5804 168 SW

Lynn Wood 10A 98037-8320

# EDMONDS CROSSING

Connecting ferries, bus & rail

## COMMENT SHEET

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### COMMENTS:

①

The Point Edwards Phase look's Like A  
Great Location and Idea!  
Lets Do IT.

(Please print)

Name Mike A O'Brien Phone: (206) 598-1643  
Address 2338 NE ALDER CT  
City Poulsbo State WA Zip 98370

Please return to: Washington State Department of Transportation, Dale Morimoto,  
Environmental and Special Services Engineer, P.O. Box 330310, MS 138, Seattle, WA  
98133-9710

Thank you!

## Comments on Edmonds Crossing DEIS

Anne Robinson  
16315 48th Place W.  
Edmonds, WA 98026

I attended the April 2 Open House at Edmonds and had the opportunity to talk to a number of the representatives there. Thank you for the opportunity.

My questions, comments, and concerns.

① 1. Please do not neglect to keep all the alternatives open. The statement was made at the open house that there was only one option under consideration. I hope not. I realize that the Pt. Edmonds option was already highly favored in the 1994 Edmonds Waterfront Plan, however, under NEPA/SEPA all alternatives must be considered until the final decision is made.

2. I do not agree with the Pt. Edmonds site for the dock. I feel the mid-waterfront (m-w) site is preferable. In the following comments, I have given a number of reasons for this decision. My reasons center around eel grass restoration, anadromous fish passage, and sustainability for the city (business district) of Edmonds.

3. I want to see the present pier removed and the site returned to its pre-pier state. I feel there is no need for an additional fishing pier and there is much need for an un-divided stretch of beach as part of the "culture" of the city of Edmonds, and the right of the citizens to beach access. Beach users are more numerous than fisherpeople, in addition to which, there is already a large designated fishing pier in Edmonds.

1A 4. While I realize that the m-w site would impact an eelgrass bed, it is also true that there is eelgrass to the north of the present pier and to the south of it. With the removal of the present pier and the restoration of its site from the propeller scour and the removal of the piers, the eelgrass would be encouraged to fill in that area as a mitigation for the impact at the new m-w pier. I would prefer to have the continuous eelgrass bed to the north as there are no further shoreline obstructions for salmonids for some distance north.

② 5. While the plans for the multi-modal station and other buildings is not yet final, I want to see the design of those buildings and structures kept in the general style (early 1900's) of the older houses in Edmonds. I think that is the cultural heritage of the town, it gives it a certain "flavor", and I heartily believe that it should be retained. The designs should not just be glass and modern as in the present artist's concept; and should possibly be reviewed by the appropriate historical society/group to ensure they fit with the flavor of Edmonds. The multi-modal center will be such a change to the landscape and tone of the city, that its architecture should be made the least offensive and obtrusive possible.

②k 6. I do not see that it enhances the waterfront to impact the present <sup>Marina</sup> ~~Olympic~~ Beach Park. That park provides for families with children, non-boaters, non-divers, and dog walkers to enjoy the

2A  
Continued  
beach also. The addition of a pier, 6 lanes of cars, and other assorted amenities, in addition to the already constricted (by the marina) north side of the park, will make the park nothing more than a piece of grass that could just as well be in the uplands or anywhere else. With the wave action of the ferries and the additional noise, it will remove the concept of beachfront park and the congestion and difficulty of reaching the park will certainly prevent kite-flying, family picnics, beach walking and any other leisure time activity except waiting for the next ferry.

3  
7. The Pt. Edmonds site would impact the entry to the hatchery for returning salmonids. The entry is small and is almost obscured (as I hear it) by sand during non migrating season. It is only the wave action that causes the movement of sediments along the littoral zone that frees that opening so that hatchery salmon can return. The placement of buffers to protect the ferries from the stronger winds at the Pt. would seem to preclude necessary wave action to move the drifting sands from the return.

4  
8. I do not feel that the M-W site cuts the downtown off from the beach (as one presenter stated at the meeting). The only thing cut off is the marina. The town, along Main St., still has the same access to the beach as before, at least for walking and other non transportation uses. In addition, the M-W site keeps the ferry passengers/commuters in closer proximity to the downtown merchants so that the economic viability/sustainability of Edmonds' merchants is not undermined. I do not feel that passengers/commuters will walk 3/4 of a mile to the downtown shops and I am certain that to a reasonable extent, the economic stability of the downtown area is dependent upon the pass-through traffic. I want to see a sustainable community, rich in tradition, not swept under by the multi-modal concept. I think the multi-modal should fit into the character of the community and enhance it, not overwhelm it. I do not want to see new, tacky retail stores take all the business away from the traditional downtown merchants.

9. I would rather see the old, constantly re-cycled, ex-Safeway complex used as the basis for the commuter center than to impact another new, non-paved section of land. Even though the proposed alternative Pt. Edmonds multi-modal center site is known to be the most contaminated portion of the Unocal site, it still is being cleaned up under MTCA and will be eventually usable, perhaps with some of the adjacent area, for a continuation of the park, or for more development of a less intrusive nature. It is obvious that in the future, there will be some type of residential development in the upper Unocal property, it will enhance that property to be a little distant from the major traffic handling of a 6-lane ferry holding zone.

5  
10. The use of the Pt. Edmonds site would tend to stretch the commercial zone of Edmonds from Main St, further to the south, to intersect with the multi-modal center. The town of Edmonds does not need, and probably cannot support that large a commercial area. The area would, over the long term, tend to degrade, being useful neither for commercial nor residential. The use of the M-W site would keep the commercial zone about the same as it is now, with the added benefit of upgrading some of the properties. If the business zone grows, it will still have adequate space surrounding the new facilities.

11. While the Port of Edmonds may not like to have the M-W alternative, I do not consider the port anything but another commercial enterprise. They do not enhance the waterfront for the

citizens, all piers are locked and inaccessible to anyone except the owners. The boat storage areas are unsightly and can be moved further to the south. They do not need to store the boats immediately adjacent to the marina. If the port had more beneficial use to the public, e.g. more open walkways, perhaps I would be more sympathetic to their requests. Edmonds has a nice sized marina, it probably is not as large as the port would like to build it, however, it does detract from the availability of the shoreline to the public. In addition, the marina would still have adequate access along Dayton, in addition to secondary access points.

6 12. The breakwater and the pile dikes required for the Pt. Edmonds alternative would create new hazards for the salmon, in addition to the shading caused by the pier itself. Avoidance would cause the salmon to move out to deeper water where they are more susceptible to predation. These factors would be a particular hazard to the returning hatchery salmon. In addition, the breakwater and pilings would cause a change in the currents along the shore, and to the movement of sediments along the coastline, which moves constantly from south to north, at all seasons.

13. The M-W alternative impacts the Edmonds Marsh less, in that it does not infringe on the buffer zones around the marsh. The salmon are very persistent and manage to fight their way past blue heron attacks, but impacting the marsh itself, causing a different hydrologic regime, would dramatically impact the salmonids.

7 14. Some "out-of-the-box thinking": Why must the vehicle parking be immediately adjacent to the terminal, and why must it all be in one place? What is the possibility of several smaller parking facilities, with a shuttle service, such as at the airport? It would make the footprint of the multi-modal center smaller, and would relieve some of the congestion at the one area.

8 15. I do not see any provision made for the many terminal users who will be coming from the north of Edmonds, where there is concentrated residential development. Patrons of any of the modes of transportation would be forced to still wind their way through various residential areas (possibly 164th SW, possibly 196th SW) to the waterfront. Another impact that could be lessened by the use of satellite parking lots, with fewer shuttle buses than cars. I am sure that the residential neighborhoods of Edmonds basin are not happy about the impact of transit bound vehicles, and it is to be hoped that public meetings have been held to include them in this process. Edmonds is a residential community, not a large commercial city, the best concept is to try to maintain the ambience, even in the face of progress.

9 16. The M-W site would require a shorter pier, with a shortened passenger walkway. This would obviate the need for a "people mover". Is the need only due to the length of the Pt. Edmonds alternative, or just because it is "new and fascinating" technology? Most of the people on the ferry will not be carrying any luggage other than lunches and briefcases, so it is not a necessity as in airports, to move people encumbered with luggage. The people mover appears to be a fad, and not an essential part of the terminal.

10 17. The need to have the Coast Guard enforce a no-fishing zone around the ferry "pathway" would add costs to their budget, and have yet another layer of regulation on fishing. I cannot

10  
continued

believe that tribal fishing rights would allow that tribal members be excluded from usual and customary fishing sites. The only other alternative is to buy the rights, and I have heard that is most expensive.

11

18. It is important, when considering multi-modal transportation, to include all modes of transportation, which includes bicycles and walkers. What provisions have been made to encourage less use of automobiles and more use of non-traditional modes?. By building larger and larger ferries and piers and holding areas, the private passenger car is given the greatest share of the improvements. What thought has been given to passenger-only ferries on this run? What about smaller ferries at off-peak periods? What about HOV lanes which get loaded first? What type of transportation model was used to predict the increased trip utility of this ferry?

12

19. Since the railroad tracks are not going to be moved, and since the beach is on the west side of the tracks, there will be conflicts between rail traffic and all other traffic into the foreseeable future. The placement of the new pier will not change that. The use of the present terminal as a part of the new terminal would seem to be good use of already impacted land..

13

20. The relative locations of the ferry, bus and train terminals, in my estimation, have little to do with encouraging inter-modal trips. A great problem is the lack of bus service to the area, since Edmonds is an "end-point", not "on the way" to somewhere . The CT runs need to be better coordinated with the other transportation, perhaps just with a shuttle. At present, the only Seattle bound buses come all the way into Lynnwood to the P/R before heading into Seattle. That is probably, at present, the only cost effective way. However, the ridership of the buses needs to be built up, not fault placed with the terminal facilities.

I do not categorically object to this project, I only wish to see the merchants and citizens of Edmonds best served. Change, per se, is not progress. Edmonds must remain a sustainable city, with opportunity for walking, biking, beach access, fish and marsh habitats, and an attractive business district. All changes must fit into the overall structure, not irrevocably change the city of Edmonds.

Thank you for the opportunity to comment. Please keep my name on your mailing list for future notices.

Anne M. Robinson  
16315 48th Place W.  
Edmonds, WA 98026  
ph. 425-743-9885

*above call to address comments are late.*



To: Governor Gary Locke Olympia WA Jan 26 1998  
From: C Edward Simons, MD, 22300 Woodway Park Road  
Woodway WA  
Subject: Acquisition of Point Wells for Multimodal Transport Hub

Point Wells is located on the East shore of North Puget Sound approximately one mile south of Edmonds WA and is currently owned by Chevron Company. It is currently phased out as a petroleum products facility except for an existing asphalt processing plant. It is an area of 30+ Acres occupying mostly Tideland on the seaward side of the Burlington-Santa Fe Railroad right-of-way and tracks and extending 4400+ feet northward from the King-Snohomish County line adjoining the Town of Woodway to the East. It is an overall level area being cleared of tanks and lines of petroleum product unloading and storage facilities. It is currently being considered as one option for a wastewater processing unit for the northend area. It is also becoming a jurisdictional subject between the Town of Woodway and City of Shoreline. There are surely other interests maneuvering for acquisition and development depending on future availability. Currently it is under Snohomish County jurisdiction. Chevron Company apparently has no current plan of disposition.

Point Wells is a unique property, being the only location between Tacoma and Everett offering potential availability, level space, large area, (30 Ac) tideland and deep water access, rail line access, four lane highway access (185th St). In short it is the ideal location for a multimodal transportation facility development. The Edmonds-Kingston Ferry site-options are all woefully short of adequate space for expansion in Edmonds. The Chevron Co. asphalt plant could be relocated to the Union Oil site in Edmonds. There would be abundant space for ferry parking, rail depot, ferry slips and also room for a wastewater processing facility if so selected by Metro. Development of Point Wells would be the least disruptive of existing alternate locations for multimodal transport use on the East side of North Puget Sound.

In view of the above favorable factors, consideration should be given by appropriate State government agencies for early acquisition of the Point Wells property by Washington State by whatever means necessary. Action will assure availability for development of Point Wells as a superior multimodal facility .

Respectfully/ C. Edward Simons, MD





April 27, 1998

Mr. Dale Morimoto  
Environmental and Special Services Manager, MS 138  
Washington State Department of Transportation  
P. O. Box 330310  
Seattle, WA 98133-9710

Re: Draft EIS, Edmonds Crossing

APR 29 '98			
DATE RECEIVED			
TO	DISTRIBUTION	INIT.	DATE
	ENV. PRGS. MGR.		
	AIR & NOISE		
	HYDRAULICS		
	BIOLOGY		
	DOCUMENTATION		
	RECYCLE		
	OTHER		
	FILE		

Dear Mr. Morimoto:

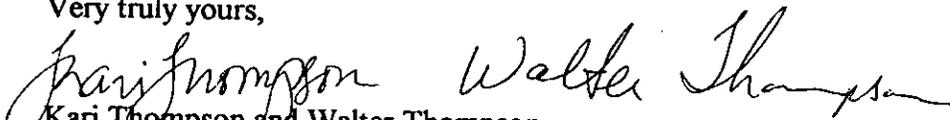
For the last 40 years the Unocal Marsh has been severely degraded. It was back-filled for the construction of the boat harbor. The north end of the marsh was filled-in for an almost-defunct strip mall. Both creeks have been culverted for apartment houses, roads, and businesses. Let's not continue to degrade this valuable resource without serious consideration. The draft EIS does not address the environmental impact of the proposed Edmonds Crossing on this wetland.

① The wetland is one of the few remaining saltwater/fresh water marshes in Puget Sound. It supports both fresh and saltwater species of fish and communities of birds, including the endangered bald eagle. The Deek Creek hatchery relies on the stream flow to the south end of the marsh as its water source.

② The draft EIS concludes that the environmental impact of the Edmonds Crossing on the wetland will be minimal without any supporting evidence. Thus, the EIS, at least with respect to the wetland, fails. It does not address the environmental impact on lost fish, bird, and plant habitat; altered currents along shoreline due to ferry pier construction; further divisions of already disrupted wildlife corridors; increased storm water flows from the proposed seven lane access road and parking area; on native juvenile salmonids using Willow Creek; and decreased fish access and velocity barriers with an additional 400 feet of culverted stream.

The draft EIS has addressed some important environmental issues, but it is only a draft, and it does not address other important issues that must be recognized and mitigated before proceeding further.

Very truly yours,

  
Kari Thompson and Walter Thompson  
720 Spruce Street  
Edmonds, WA 98020

# EDMONDS CROSSING

Connecting ferries, bus & rail

## COMMENT SHEET

We are very interested in hearing your comments on this project. You may return this sheet today or take it with you to fill out later. If you wish to mail in your comments, please send this sheet to the address listed below. Comments are requested to be postmarked before April 27, 1998 to be considered in finalizing the Environmental Impact Statement and design documents.

### COMMENTS:

① I would like to see a project like this. The multi-mode transportation center would make it much easier for me to commute without taking a vehicle onto the ferry.

(Please print)

Name Tom Wanek Phone: (360) 779-4682

Address 255 NE Evans Ln

City Boulevard State WA Zip 98370

Please return to: Washington State Department of Transportation, Dale Morimoto, Environmental and Special Services Engineer, P.O. Box 330310, MS 138, Seattle, WA 98133-9710

Thank you!

✓

# EDMONDS CROSSING

Connecting ferries, bus & rail

## COMMENT SHEET

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### COMMENTS:

① The Pt Edwards site would be a great improvement. Make sure there is ample off sheeting for walk on commuters

(Please print)

Name Steve Weagant Phone: (360) 598-4168  
Address 5265 NE Lincoln Rd E  
City Roulsbo State WA Zip 98370

Please return to: Washington State Department of Transportation, Dale Morimoto, Environmental and Special Services Engineer, P.O. Box 330310, MS 138, Seattle, WA 98133-9710

Thank you!



April 25, 1998

Comments on The Environmental Impact Statement for  
SR104 Edmonds Crossing

After review of the EIS, the following points must be made:

- ① • Proposed placement of the road would completely ignore the 17 pair of Great Blue Heron that have made the trees their nesting site. Failure to take into account this species of bird would seriously damage our wildlife refuge that is the marsh.
- ② • The salmon hatchery, located on Willow Creek along the south boundary of the marsh, cannot be ignored as an integral part of our community. The protections of this valuable resource aren't being taken into account in the EIS.
- ③ • There was inadequate consideration of the increased storm water runoff due to the unavoidable increase in impervious surfaces that will be caused by the development of this project.
- ④ • One of the most absurd points regards the placement of the Burlington Northern railroad tracks on the east side of the present tracks, filling in part of our valuable marsh. Burlington Northern has no right of way any further east of where they are presently situated. It would make more sense to talk about new tracks where they legally have right of way -- ON THE WEST SIDE OF THE PRESENT TRACKS.

Concerned citizen of Woodinville,

*Margaret Weidner, Ph. D.*  
Margaret Weidner, Ph. D.