

EDMONDS CROSSING

Connecting ferries, bus & rail



6.1 Introduction

6.1.1 Section 4(f)

Federal law 23 United States Code (USC) Section 138, which is commonly known as Section 4(f) in the Department of Transportation Act of 1966 as 49 USC 1653(f), prohibits the Federal Highway Administration (FHWA) from approving a project or program that uses land from a public park, recreation area, wildlife and waterfowl refuge, or historic site except if: (1) there is no feasible and prudent alternative to the use of the land and (2) the project includes all possible planning to minimize harm to the property. If a feasible and prudent alternative that avoids such use is available, it must be selected. If such use is unavoidable, then measures must be identified that minimize and mitigate for direct and indirect harm to the property.

Section 4(f) provides a mandate to make special efforts to “preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites.” The special efforts include a Section 4(f) Evaluation, which entails a detailed description of affected resources, discussion of where the project uses these resources, identification and evaluation of alternatives that avoid such uses, and all possible mitigation measures to minimize unavoidable adverse effects. A constructive use occurs when the proposed project does not use land from a Section 4(f) resource, but the project’s proximity impacts (such as effects of noise or impacts on visual values of a park) are severe enough that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired according to 23 Code of Federal Regulations (CFR) 771.135(p)(2).

The purpose of this Final Section 4(f) Evaluation is to identify 4(f) resources within the project area and show how the alternatives may, or may not, use them, to determine whether there are feasible and prudent locations for the multimodal center and associated roadways that avoid the use of Section 4(f) properties, and to identify potential measures that should be considered to minimize harm resulting from unavoidable uses of the Section 4(f) properties.

During the initial evaluation of the project area, no currently recorded historic or archaeological properties were found to be listed on or determined to be eligible for listing on the National Register of Historic Places. The cultural resources survey for the project did not identify any archaeological sites within the Area of Potential Effect. Consequently, this Section 4(f) Evaluation focuses on five park facilities and one wildlife refuge in the project area.

Any unidentified historic or cultural resources discovered during project construction are also subject to Section 4(f) requirements. Upon discovery of the potential resource, Washington State Department of Transportation (WSDOT) would be required to suspend work in the immediate area and contact Federal

Highway Administration (FHWA) and the Office of Archaeology and Historic Preservation (OAHP) for consultation. In general, Section 4(f) requirements apply if a resource is determined to be on or eligible for the National Register.

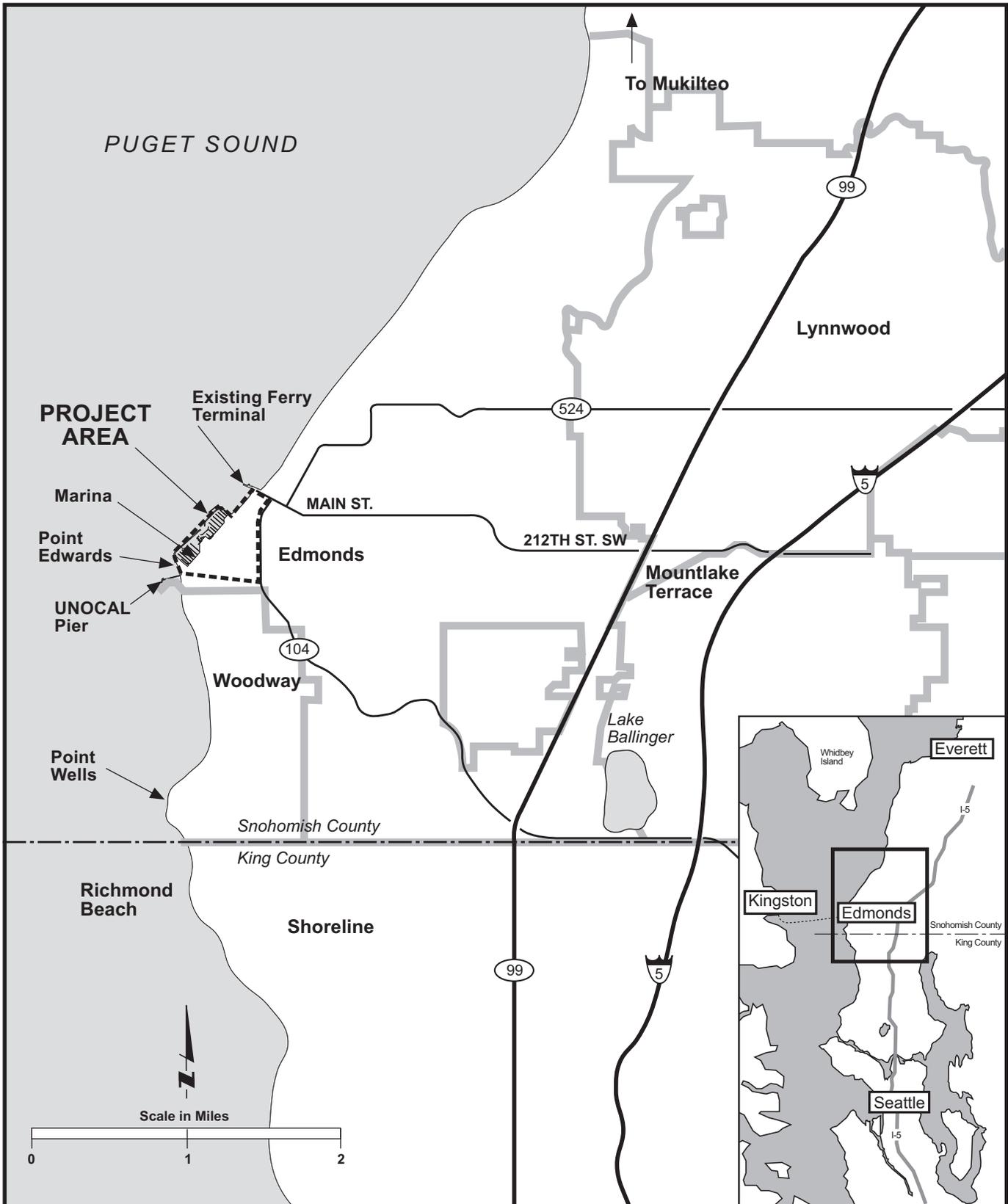
If it is concluded that a Section 4(f) Evaluation is necessary, an expedited Section 4(f) process can be used under these circumstances, pursuant to an October 1980 Memorandum of Understanding (MOU) between FHWA and the National Park Service, Archeology and Ethnography Program, U.S. Department of the Interior, NPS National Center for Cultural Resources. Even if a Section 4(f) Evaluation were not warranted, Section 106 and other state and local requirements pertaining to cultural resources would still apply.

6.1.2 Section 6(f)

In addition to Section 4(f) requirements, some of the potentially impacted parklands were acquired and/or developed with Section 6(f) of the Land and Water Conservation Act funds administered by the Washington State Interagency Committee for Outdoor Recreation (IAC). These parklands cannot be converted to non-recreational purposes without the approval of the U.S. Department of the Interior/National Park Service. That approval is dependent on mitigation through replacement with property of at least equal fair market value and of reasonably equivalent usefulness and location.

6.2 Description of the Proposed Action

The Edmonds Crossing project is intended to provide a long-term solution to current operations and safety conflicts between ferry, rail, automobile, bus, and pedestrian traffic in downtown Edmonds (see Figure 6-1 for vicinity). FHWA, the Federal Transit Administration (FTA), WSDOT (including Washington State Ferries [WSF]), and the City of Edmonds, in cooperation with the United States Army Corps of Engineers (Corps), the U.S. Coast Guard, the Suquamish Tribe, the Tulalip Tribe, the Lummi Nation, the Port Gamble S'Klallam Tribe, and the Swinomish Tribe propose to relocate the existing state ferry terminal from Main Street in downtown Edmonds to another site farther from the downtown core. In the process, a multimodal center would be established that would integrate the ferry, rail, and transit services into a single complex. A realigned State Route (SR) 104 would provide access to the center from its current intersection with Pine Street. The new complex would provide an upgraded ferry terminal designed to meet the operational requirements for accommodating forecast ferry ridership demand; a new rail station designed to meet intercity (Amtrak) passenger service and commuter rail loading requirements; a transit center that would meet local bus system and regional transit system loading requirements; facilities for accommodating both vehicular commuters and walk-on passengers of the available transportation modes (parking, drop-off areas, retail/concessionaire space, and waiting areas); and a system linking these facilities to allow for the safe movement of users.



154090.G1.07.A1_T092004007SEA • 6-1 Vicinity Map • 9/24/04 • dk/gm

EDMONDS CROSSING
 Connecting ferries, bus & rail

Figure 6-1
Project Vicinity Map

6.3 Alternatives Analyzed in the Environmental Impact Statement

Several alternative sites for the relocated ferry terminal and the proposed multimodal center were evaluated as part of the early screening process.

Screening criteria included how well the alternative met project objectives, traffic and safety considerations, environmental impacts, benefits to the community, and ease of implementation.

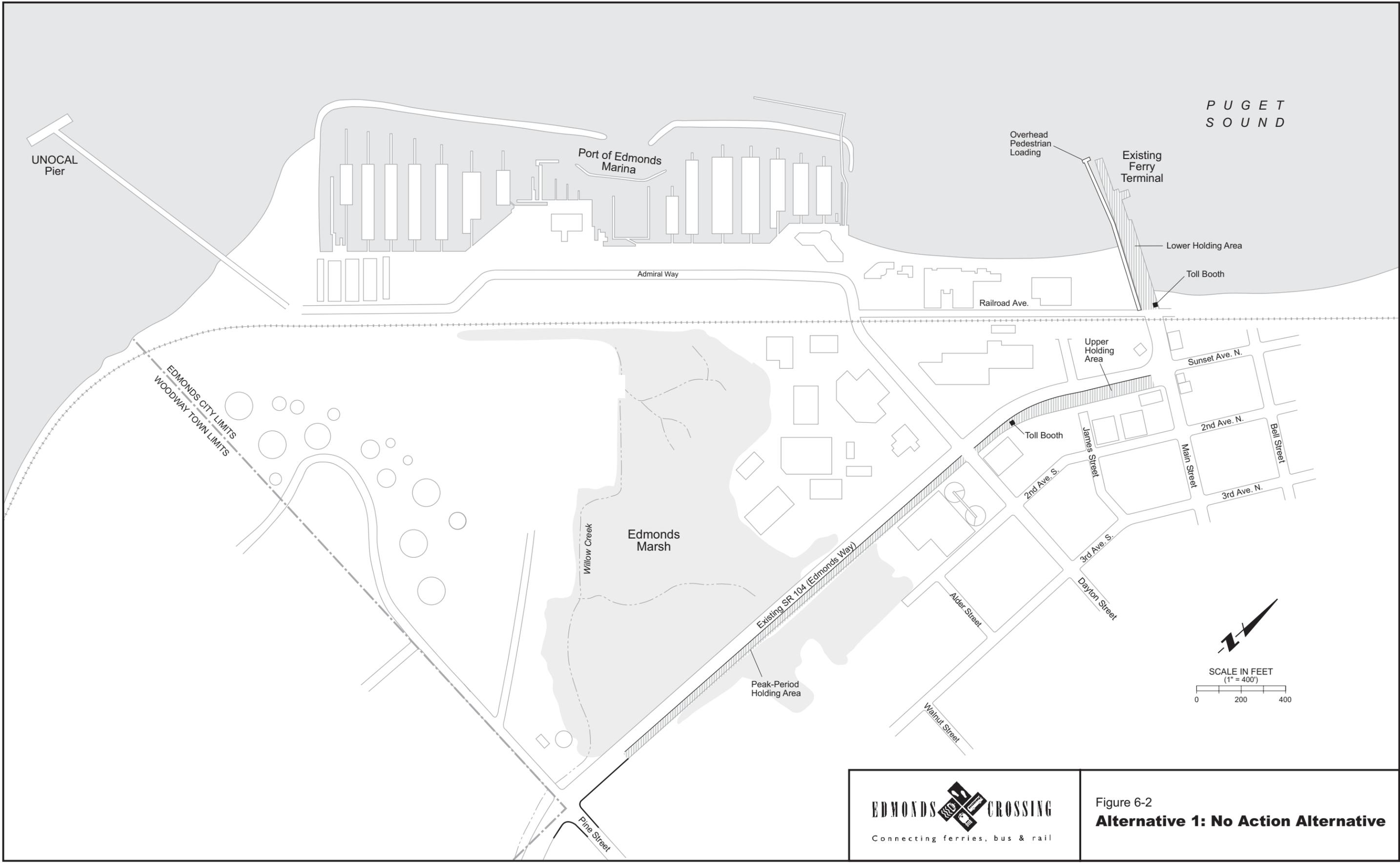
During this screening process, federal, state, regional, and local regulatory agencies; the City of Edmonds and the Town of Woodway; and residents of the project area provided input regarding issues that could impact the selection of reasonable alternatives. Based on this extensive screening process, two build alternatives were recommended for further analysis in the Environmental Impact Statement (EIS) process. As required by the National Environmental Policy Act (NEPA), a No Action Alternative has also been analyzed.

6.3.1 Alternative 1: No Action

The No Action Alternative assumes that the present single-slip ferry terminal would be maintained at its existing Main Street location (Figure 6-2). The overhead loading bridge and other pedestrian-related improvements that have been made over the last few years would be in place until ferry operations are moved elsewhere. Only normal maintenance activities would occur as part of the No Action Alternative. Without a second ferry slip and other major improvements proposed as part of the build alternatives, it is unlikely that the No Action Alternative would adequately meet future ridership demand or other objectives of the project.

6.3.2 Modified Alternative 2: Point Edwards Site

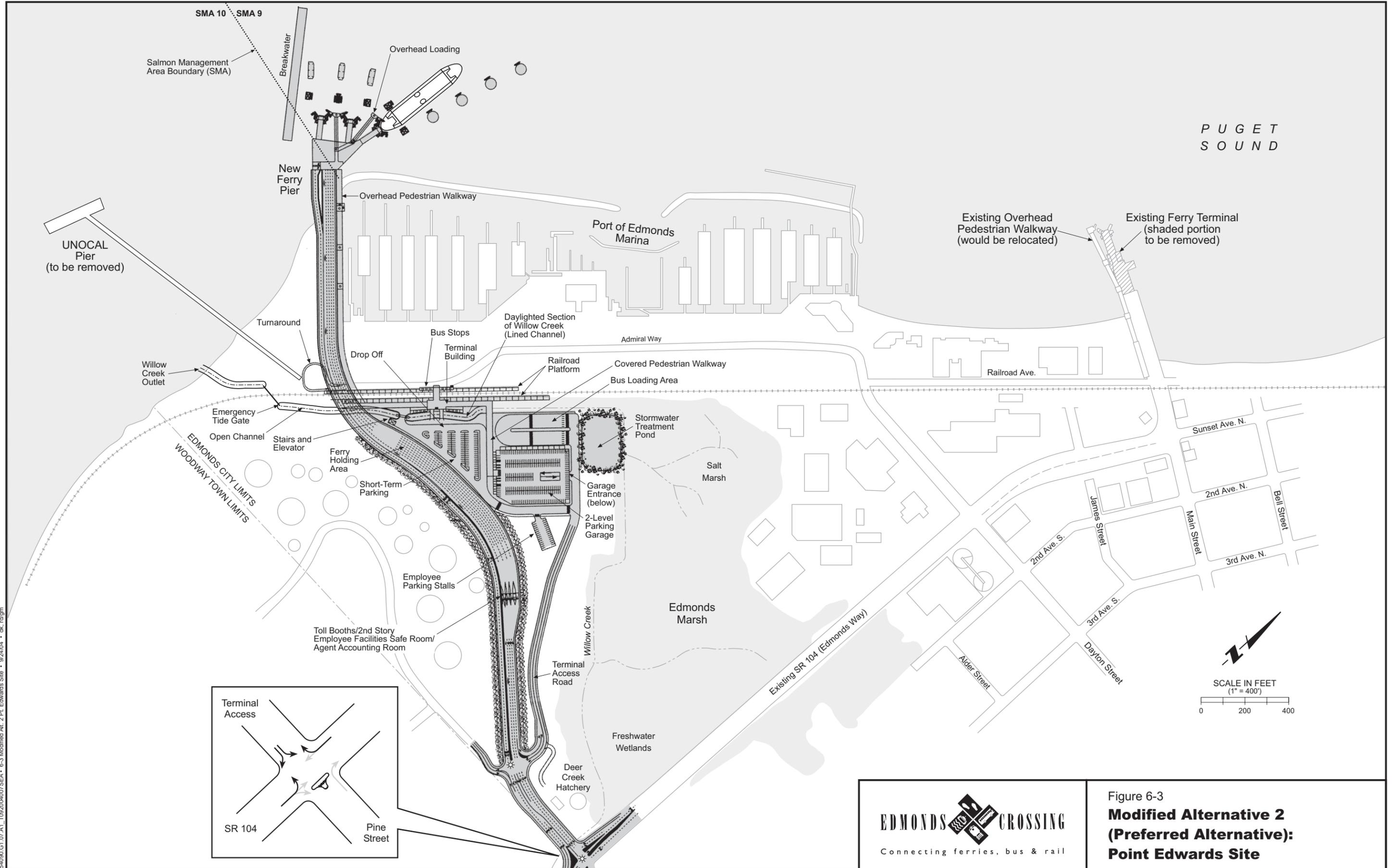
Modified Alternative 2 is proposed as the preferred alternative in the Final EIS. This alternative proposes the relocation of the ferry terminal and the development of the multimodal center at Point Edwards, located approximately 2/3 mile south of the Main Street terminal. As shown in Figure 6-3, realigning SR 104 from its current intersection with Pine Street would provide access to the proposed complex. Realigned SR 104 would traverse the lower portion of the bluffs within the existing Union Oil Company of California (UNOCAL) property. The westbound lanes would include three to eight general purpose lanes and a high-occupancy-vehicle (HOV)/bypass lane that could be used during peak ferry travel periods to hold approximately 820 waiting vehicles, eliminating the need for vehicles to queue along the side of SR 104 south of Pine Street. Two eastbound lanes would carry vehicles leaving the ferries. Realigned SR 104 would cross over the Burlington Northern Santa Fe Railroad (BNSFRR) tracks and would extend over the Port of Edmonds southern breakwater to a three-slip ferry terminal.



154090.G1107.A1_T092004007SEA - 6-2.Alt. 1 No Action - 9/24/04 - dk/gm

EDMONDS CROSSING
 Connecting ferries, bus & rail

Figure 6-2
Alternative 1: No Action Alternative



154090.G1.07.A1_T0920407SEA - 6-3 Modified Alt. 2 Pt. Edwards Site - 9/24/04 - dk, rd/gm

Figure 6-3
**Modified Alternative 2
 (Preferred Alternative):
 Point Edwards Site**

The multimodal center would be located in the lower yard of the existing UNOCAL property. Vehicle access would be provided via a road off realigned SR 104. The center would include a new railroad station with two loading platforms that straddle double tracks; a bus terminal that accommodates up to 10 regular-sized buses; a two-level, 460-space parking garage to accommodate park-and-ride and overnight commuters and a 90-space short-term parking lot; a pedestrian walkway system that would interconnect the various modes and areas within the center; and a weather-protected walkway that would accommodate pedestrian movement between the center and the ferry terminal.

6.3.3 Alternative 3: Mid-Waterfront Site

Alternative 3 proposes the relocation of the ferry terminal and the development of the multimodal center at a site roughly one-third of the way between the existing Main Street terminal and the Point Edwards site. As shown in Figure 6-4, access to the proposed complex would be provided by the realignment of SR 104 from its current intersection with Pine Street (similar to that proposed under Alternative 2). Ferry-bound realigned SR 104 would include two to five general-purpose lanes and a HOV/bypass lane. During peak ferry travel periods, the lanes could hold up to 810 waiting vehicles. After crossing the railroad tracks, the roadway would descend to ground level, run parallel to and west of the tracks, and extend to a three-slip ferry terminal immediately adjacent to the Port of Edmonds northern breakwater. Two eastbound lanes along realigned SR 104 would carry vehicles leaving the ferries.

The multimodal center would be located adjacent to the BNSFRR tracks north of Dayton Street, west of Edmonds Way, and south of James Street. The center would include a new railroad station with two loading platforms that straddle double tracks.

Buses would approach the center from either Dayton or James Street and would unload passengers adjacent to the eastside rail platform. In order to accommodate short-term parking and park-and-ride and overnight commuters, a three-level, 490-space parking garage would be constructed; approximately 49,000 square feet of retail commercial space would be provided in the ground level of the garage. An overhead pedestrian walkway would interconnect the parking garage, rail platforms, and the ferry terminal and overhead loading facilities.

To facilitate traffic movement along Dayton Street and access to the Port of Edmonds and other waterfront uses, Dayton Street would be reconstructed under the railroad tracks and the ferry staging/egress roadway and would connect to a realigned Admiral Way.

6.4 Studies and Consultations

Assessment of existing conditions at each potential 4(f) property was made through site visits and review of parks planning documents. Direct (property acquisition) use was determined by comparison of mapped park boundaries and facilities with available conceptual-level plans for the proposed multimodal center, ferry pier, and access roadways; constructive use was evaluated primarily in coordination with

analysis of other elements of the environment (e.g., noise, aesthetics, vegetation, air quality, and wildlife). As described in Section 6.9, Coordination, the local official with jurisdiction over 4(f) properties was also consulted during preparation of this analysis.

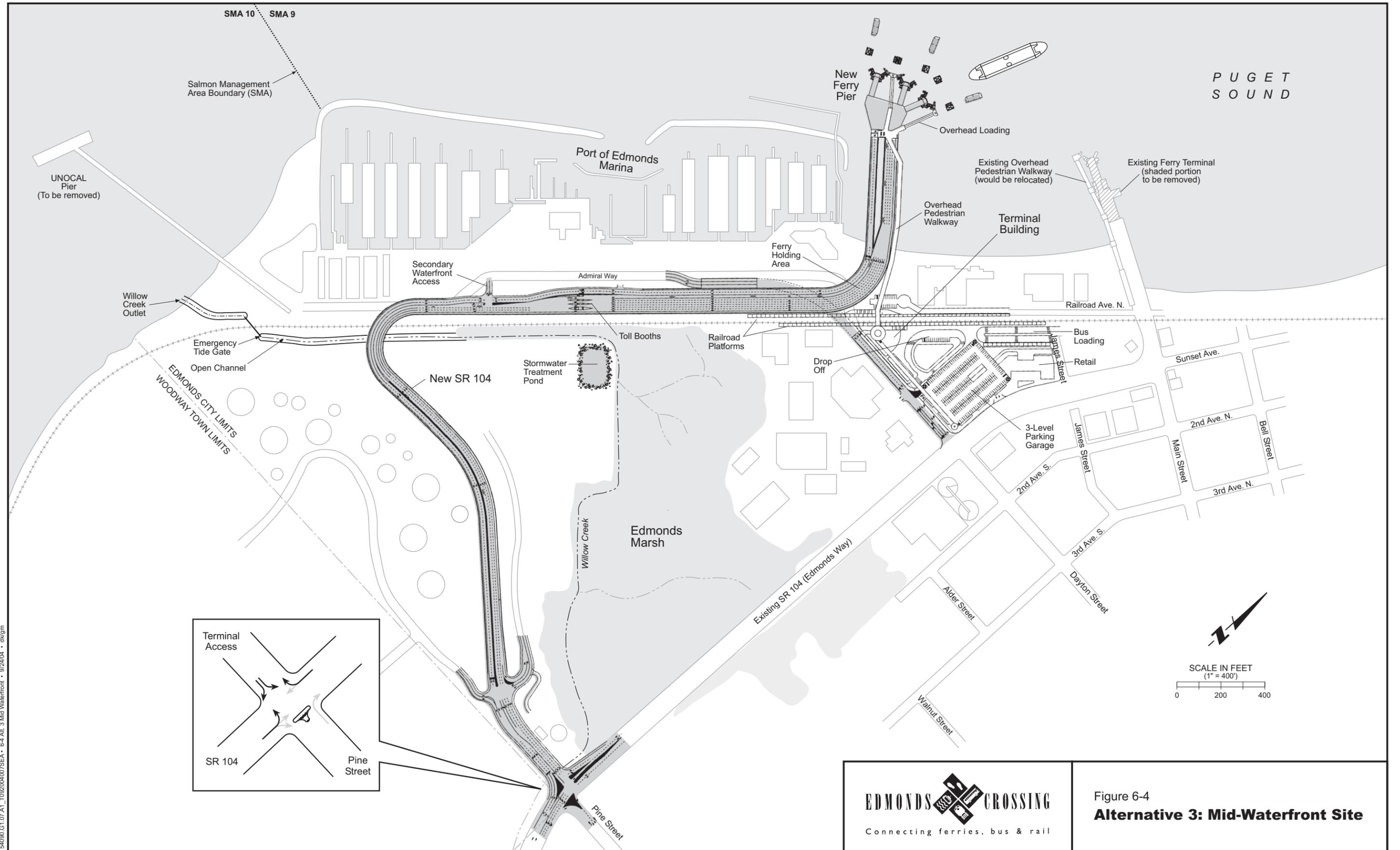
One potential Section 4(f) property identified in the Draft Section 4(f) Evaluation (included in the 1998 Draft EIS) was the Port of Edmonds Marina. In a letter dated July 30, 1996, the Port indicated that its mission for the Edmonds Marina was for leased private enterprise commercial functions and for future Commercial/Office Development “to stimulate the economy of the Port District and enhance the quality of life for the Port District residents by providing excellent waterfront infrastructure and high quality customer service.” Public access to Port facilities, including shoreline, wetlands, and the Marina, would not only be revenue-producing, but also provide an element of recreational opportunity. The pedestrian walkway stretching along the Marina waterfront between Olympic Beach Park and Marina Beach Park is one such facility. Because this walkway is one of two public accesses to Marina Beach Park (the other being the sidewalk along Admiral Way), and because the walkway may sustain temporary construction impacts related to Modified Alternative 2, it was originally considered a Section 4(f) property. However, as a result of further review and consultation with the Port, the fundamental mission of commercial and economic development of the Port of Edmonds Marina is unchanged, thus removing the pedestrian walkway from consideration as Section 4(f) property for evaluation in this analysis.

6.5 Description of Section 4(f) Properties

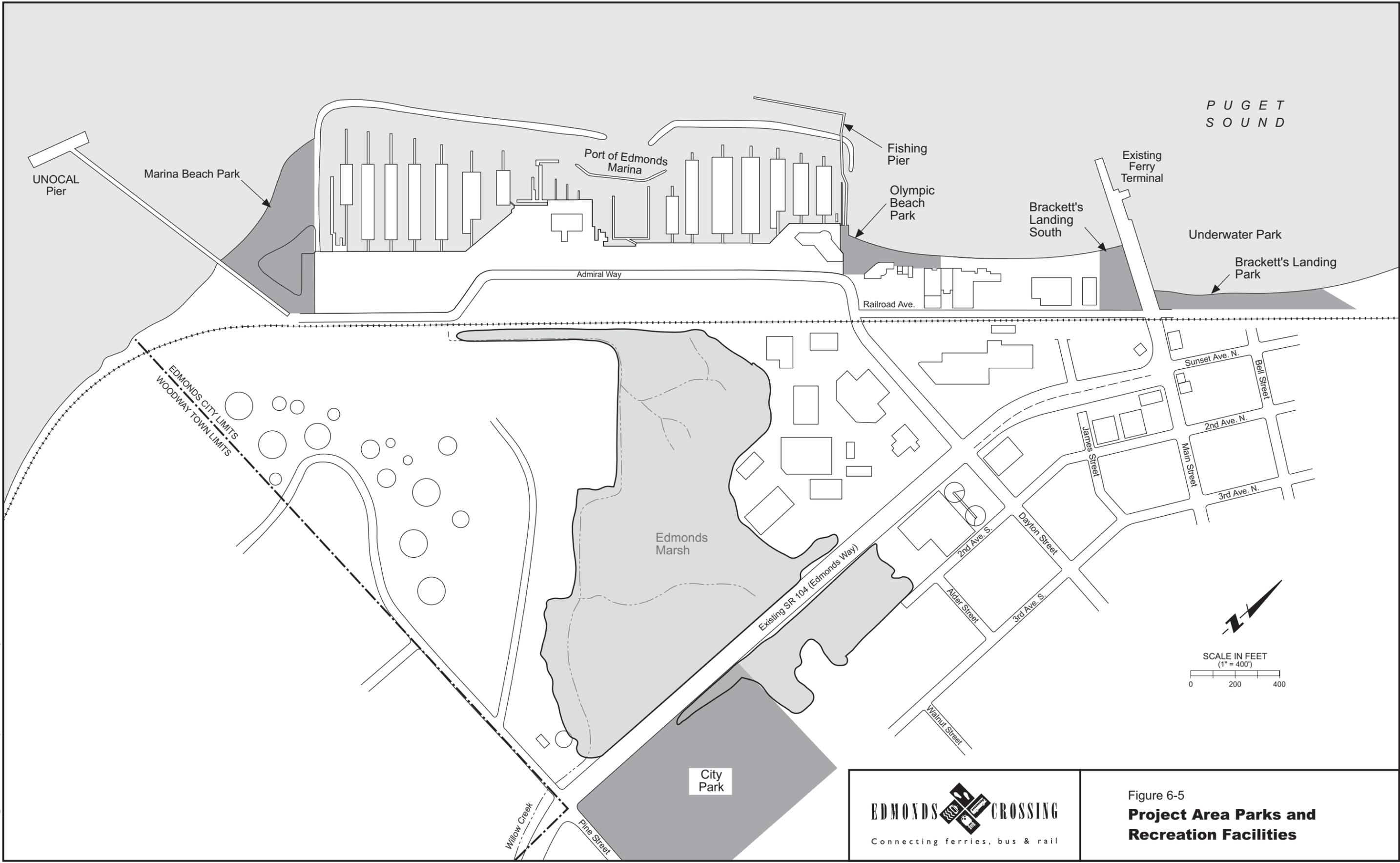
This section describes those properties in the project area protected under Section 4(f) regulations. Properties identified include five City of Edmonds parks and one wildlife refuge (see Table 6-1 and Figure 6-5). Each facility is described in terms of its existing character and value to the community.

The proposed Edmonds Crossing project is in a concentrated area of park facilities. The combination of a scenic shoreline and the downtown area nearby makes the project area a desirable locale for recreation. Located directly on the waterfront are, from north to south, Brackett’s Landing Park (northern and southern portions), the Underwater Park, Olympic Beach Park, the Edmonds Fishing Pier, and Marina Beach Park (Figure 6-5). Each of these parks offers waterfront access, and all are designated as marine sanctuaries under City Ordinance 2284. To the east of SR 104 is City Park, one of the more heavily used park sites in the Edmonds system. In addition to the parks is Edmonds Marsh, a bird and wildlife refuge with interpretive trails in a wetland currently being reestablished as a saltwater marsh.

Planning policies, goals, and recommendations for parks and recreation facilities in the project area are contained primarily in the *Edmonds Parks, Recreation, and Open Space Comprehensive Plan*. The *Parks, Recreation, and Open Space Comprehensive Plan* provides an inventory of existing facilities, an assessment of facility needs and recommendations, and an action plan for park system development. As part of its assessment of existing conditions and deficiencies in the recreational system, the *Parks, Recreation, and Open Space Comprehensive Plan*



154090.G1.07.A1_T092004007SEA - 6-4 Alt. 3 Mid Waterfront - 9/24/04 - dk/gm



15/009.G1.07.A1_T092004007SEA - 6.5 Project Area Parks - 9/24/04 - dl/gm

EDMONDS CROSSING
 Connecting ferries, bus & rail

Figure 6-5
Project Area Parks and Recreation Facilities

categorized each park facility in the City to a specific type. Types represented in the project area include regional parks (Brackett’s Landing, Underwater Park, Olympic Beach, and Marina Beach) and community parks (City Park). The Edmonds Marsh bird and wildlife refuge is categorized as open space. Citywide needs for each type of park are assessed in the plan through comparison with National Recreation and Park Association standards, desired “levels of service” comparison with similar Northwest communities, results of a survey of Edmonds residents, and other factors.

Name	Size (acre)	Type ^a	Ownership	Facilities
Brackett’s Landing Park (North)	2.7	Regional	City of Edmonds	Observation jetty, public restroom, exterior showers, water access, parking, native landscaping, interpretive signs
Brackett’s Landing Park (South)	2.0	Regional	City of Edmonds	Passenger terminal for Edmonds ferry; waterfront access and passive recreation
Underwater Park	22.5	Regional	City of Edmonds	Underwater gardens and trails, diving area
Olympic Beach Park/Fishing Pier	4.3	Regional	City of Edmonds/ Port of Edmonds	Picnic area, landscaped courtyard, public art, water access, fishing pier and fish-cleaning areas, shelter building, restrooms, parking, interpretive signs, beach ranger station
Marina Beach Park	4.5 ^b	Regional	City of Edmonds	Picnic area, children’s playground, water access, volleyball court, cartop boat drop-off area, parking
Edmonds Marsh Wildlife Refuge	23.2	Open space	City of Edmonds	Boardwalk, interpretive trails, signs and stations, parking
City Park	14.5	Community/ large urban park	City of Edmonds	Picnic area and shelters, open lawn area, baseball/softball fields, children’s playgrounds, horseshoe pits, wading pool, restrooms, parking, bandstand, natural area, park maintenance compound

^aAs defined in *City of Edmonds Parks, Recreation, and Open Space Comprehensive Plan (2001)*.

^bNot including informal use area south of UNOCAL pier.

Of particular importance in the context of the Edmonds Crossing project are the regional waterfront parks. The *Parks, Recreation, and Open Space Comprehensive Plan* notes shoreline access as a limited resource in the City and one that is needed to meet both local and regional needs. The plan identifies the need to acquire and promote waterfront parks and public access whenever possible. It also recommends that continuous public shoreline access be developed from Brackett’s Landing south to Marina Beach Park. In emphasizing the importance of waterfront recreation, the plan cites a survey of City residents indicating that these types of facilities are of high priority to the public.

6.5.1 Brackett’s Landing Park, North and South

Brackett’s Landing North is a small (2.7-acre) saltwater park owned by the City of Edmonds and located immediately north of the existing Edmonds-Kingston ferry pier. Important for its association with George Brackett, the founder of Edmonds, the site is on the State Register of Historic Places. The park contains about 1,500 linear feet of shoreline. It is entirely level and is bordered by the BNSFRR tracks on the east, the ferry pier on the south, and Puget Sound on the west. Facilities at the

site include a restroom, a small interpretive area with signs, beach access, an observation jetty, waterfront walkway, showers for self-contained underwater breathing apparatus (SCUBA) divers, and a parking area with 37 spaces.

The Brackett's Landing South property was purchased in 1993 through state and local grant matching funds (IAC and Snohomish County Conservation Fund Account) and is on the site of a former commercial business just south of the ferry terminal. The site is approximately 2 acres in size. The passenger terminal for the Edmonds Ferry is located at the north end of this area; the southern portion is a passive recreational area offering waterfront access, trail, views, and picnicking. The roadway approaching the ferry pier separates the North and South parcels; access under the pier is not available.

Although the Brackett's Landing North and South Park is very popular, receiving approximately 15,000 to 20,000 visitors per year, access is compromised at intervals by the need to negotiate traffic bound for the existing ferry terminal. In addition, the BNSFRR tracks cross Main Street at-grade just east of the park entrance, resulting in access difficulties when trains are passing. Brackett's Landing is currently limited in its easterly expansion potential by the adjacent BNSFRR right-of-way, which defines its shape as a narrow wedge, and by the existing ferry terminal facilities.

6.5.2 Underwater Park

The 22.5-acre Underwater Park is located north of the existing ferry pier, west of and adjacent to Brackett's Landing North. Established in 1970, it was the first designated underwater park on the West Coast. The original feature in the park was a 300-foot dry dock that sank in 1935. Other features have since been added to the park, including a sunken 94-foot tug, underwater gardens and trails, and rest floats. These facilities also provide a haven for a number of species of fish, other marine life, and aquatic plants. The Underwater Park is managed by the City and maintained through the use of volunteer labor.

As shown in Table 6-1, Underwater Park is classified in *Parks, Recreation, and Open Space Comprehensive Plan* as a regional park. While not large, the Underwater Park is unique in the region in the types of recreational opportunities it offers and attracts visitors from all over the nation. Annual usage of the park is approximately 40,000.

Access to the Underwater Park is from Brackett's Landing North Park, where divers park their vehicles and prepare their equipment. During ferry loading and/or unloading operations, access to this parking area via Main Street is interrupted.

6.5.3 Olympic Beach Park/Fishing Pier

This 4.3-acre site, classified as a regional park in the *Parks, Recreation, and Open Space Comprehensive Plan*, is located at the foot of Dayton Street (Figure 6-5). Most of this waterfront acreage is tidelands; approximately one acre is uplands. The upland area provides an open lawn area, a picnic area, restrooms, waterfront stairs, and parking lot. The site provides open views of the Olympic Mountains, as well as

views of ferries entering and exiting the terminal to the north. Access to the park is from Admiral Way; parking is provided in the large lot north of Dayton Street, which serves both the park and nearby commercial users.

The park includes an L-shaped fishing pier, protected by a wood breakwater and rock jetty on the north, that extends 500 feet into Puget Sound. Facilities on the pier include benches, a restroom/interpretive building, and fish-cleaning areas.

The most important value of Olympic Beach Park, including the fishing pier, to the community is related to the opportunity to enjoy views of the water, mountains, and ferry terminal in an area that, though surrounded by buildings, is relatively quiet and secluded from traffic.

The portion of the Olympic Beach Park north of Dayton Street is owned by the City of Edmonds, while the pier, the southern portion of the park, and the parking lot are jointly owned by the City and the Port of Edmonds. Improvements to the fishing pier were made through matching grants from the IAC with federal LWCF monies. The City and the Port share responsibility for capital improvements and the costs of maintaining the park facilities.

6.5.4 Marina Beach Park

Marina Beach Park is a 4.5-acre developed waterfront park located south of the Port of Edmonds Marina and west of the existing UNOCAL property (Figure 6-5). The UNOCAL pier borders the property on the south. Vehicle access to the site is from the north off Admiral Way; the Port of Edmonds also provides pedestrian access from the north. Facilities in the park include a large, open picnic area, a children's playground, portable restrooms, a beach volleyball court, a paved pathway, and a cartop-boat launch area. Two parking areas are available for park users: a parallel-parking strip near the boat launch area (24 spaces) and a second lot to the north (23 spaces). Although local divers sometimes use the site, the City discourages such use because of serious safety hazards posed by the abrupt drop-off not far from the shore. Overall, the park is in excellent condition and receives considerable use during the summer months. Because of the heavy summer use, the limited amount of parking and lack of permanent restrooms are often a problem. Additional parking is available in a lot on Port of Edmonds property approximately 500 feet north of the park.

On the south side of the UNOCAL pier, there is an additional flat shoreline area with footworn paths and signs erected by the Edmonds Parks and Recreation Department. Access to this area is by way of a BNSFRR easement trail beneath a raised area of the pier; however, this access is unimproved and is not suitable for disabled persons or wheelchair users. Access by way of the tideland area is difficult because of the relatively low height of the pier and the configuration of the support pilings. For years, this area has been used by the public and receives considerable use by people walking dogs, collecting shells, or seeking access to less frequented portions of the beach. Some of these uses are encouraged by signs in the northern portion of the park directing users to access points for the southern trails.

The most important value of Marina Beach Park to the community includes its relative isolation from intense land uses, which lends it an undisturbed quality unusual for a park near a downtown area. It also offers more active-use recreational facilities than the other downtown waterfront parks. The area south of the UNOCAL pier, though not park property, provides seclusion and beach and tideland access in an undeveloped location.

6.5.5 Edmonds Marsh Wildlife Refuge

This 23.2-acre site, classified as a natural open space by the *Parks, Recreation, and Open Space Comprehensive Plan*, was donated to the City of Edmonds by UNOCAL. The property is bordered by Port of Edmonds property containing the Harbor Square development on the north, by SR 104 on the east, by the UNOCAL property on the south, and by the BNSFRR right-of-way on the west. Historically a saltwater marsh, the area was closed to tidal influence for many years, but since 1987 has been reopened to the tide in the summer and is in the process of converting back into a salt-influenced marsh (Ebasco Environmental, 1990; Watershed Dynamics, 1991). The City of Edmonds has designated the site by ordinance as a bird sanctuary and wildlife refuge. There is considerable use by waterfowl, occasionally including sensitive species such as great blue heron and belted kingfisher. When the tide gates are open, salmonid species (chinook and coho) use the marsh and Willow Creek, which drains into it, as a migration corridor to the Deer Creek Fish Hatchery. Chum salmon and rainbow and cutthroat trout are also reported to use the marsh and creek system.

The City has constructed an interpretive trail with a viewing platform along the northern edge of the marsh; similar trails are planned for the eastern and southeastern portions of the marsh near the hatchery and along SR 104. Funding for the northern trail system was provided by Ecology through federal Coastal Zone Management funds and by the City and Port of Edmonds. In addition to expansion of the trail system, the *Parks, Recreation, and Open Space Comprehensive Plan* recommends acquisition of the Deer Creek Hatchery for use as the Beach Ranger Program interpretive center. Annual usage of the site is approximately 5,000. Access and use are currently hindered by the site's poor visibility (though it is visible from SR 104, its access is obscured by the Harbor Square development) and by business use of the small parking area.

Edmonds Marsh is an important site to the community because of its combination of urban open space and unique bird and wildlife refuge and habitat. The marsh is one of the last remnants of an original, pristine wetland along the southwest shore of Edmonds. Such brackish/estuarine salt marshes have largely been filled and developed, thus increasing the importance of those that remain (The Watershed Company, 1987). The public interpretive improvements help to educate facility users on the value of these areas as habitat and open space, while preserving most of the marsh in a relatively undisturbed state.

6.5.6 City Park

Located directly east of SR 104 across from Edmonds Marsh, 14.5-acre City Park is one of the more heavily used parks in the Edmonds system, receiving approximately

25,000 to 50,000 visitors per year. The site is a rectangular piece of property bordered by 3rd Avenue on the east, Pine Street on the south, a housing complex on the north, and SR 104 on the west.

The park comprises four separate components. The first is the active-use area, which includes a restroom, a children’s play area, a bandstand, and a standard softball field. The second use area is more passive in nature and is located in the middle quadrant. It contains three picnic shelter buildings, another restroom, and a wading pool. The third component is the natural area to the southeast, and the fourth is the park maintenance compound, located on the southwest corner of the site. The Northwest corner of the park along SR 104 includes a small area of emergent wetland associated with Edmonds Marsh.

Because of its variety of facilities and its central location, City Park is a valuable recreational site for the surrounding community. The park’s proximity to SR 104 results in relatively high noise levels along its western edge. However, the overall benefits the park offers, in conjunction with facility upgrades and improvements that have taken place and other planned improvements make it an important resource.

6.6 Impacts on Section 4(f) Properties

Both of the Edmonds Crossing build alternatives would acquire land from specific Section 4(f) properties and would thus directly "use" these properties in terms of Section 4(f) regulations. Each build alternative would also create specific proximity effects, none of which would be considered "constructive use." The use and/or proximity effects for each alternative by property are discussed below. Table 6-2 highlights the direct use by alternative.

Property	Alternative 1	Modified Alternative 2	Alternative 3
Brackett’s Landing	No use	No use	No use
Underwater Park	No use	No use	No use
Olympic Beach Park	No use	No use	1.5 acres of parkland (including 1.2 acres of tidelands) acquired — would bisect park into 2 smaller sections north and south of project
Marina Beach Park	No use	1.26 acres of parkland (including 0.69 acre of tidelands) acquired along northern edge of park (although most park activities within acquired area could continue)	No use
Edmonds Marsh Wildlife Refuge	No use	No use	No use
City Park	No use	No use	No use

6.6.1 Alternative 1: No Action

There would be no direct use of the Section 4(f) properties associated with the No Action Alternative. The No Action Alternative would result, however, in a worsening effect on three Section 4(f) properties: Brackett's Landing Park, Underwater Park, and City Park. Access to and from Brackett's Landing, already complicated at times by the need to negotiate loading and/or unloading ferry traffic, would be further affected by the increased volumes of traffic using the ferry. Increases in train traffic along the BNSFRR tracks, which cross Main Street just east of the park entrance, would result in further access problems and potential occasions for conflict between trains and pedestrians or vehicles.

The increased ferry and train traffic in close proximity to Brackett's Landing Park would increase peak-hour traffic noise levels within the park by approximately 4 dBA above existing levels (from 59 dBA to 63 dBA). While that increase would likely be perceptible to park users, it would not constitute a "substantial" increase per the WSDOT Statewide Traffic Noise Analysis and Abatement Policy and Procedures. In addition, the resulting noise levels would still be below the FHWA noise abatement criterion for parks and recreational land use (67 dBA). The increased noise would not preclude the continued use and enjoyment of the park and, therefore, it is concluded that there would be no constructive use of the park under this alternative.

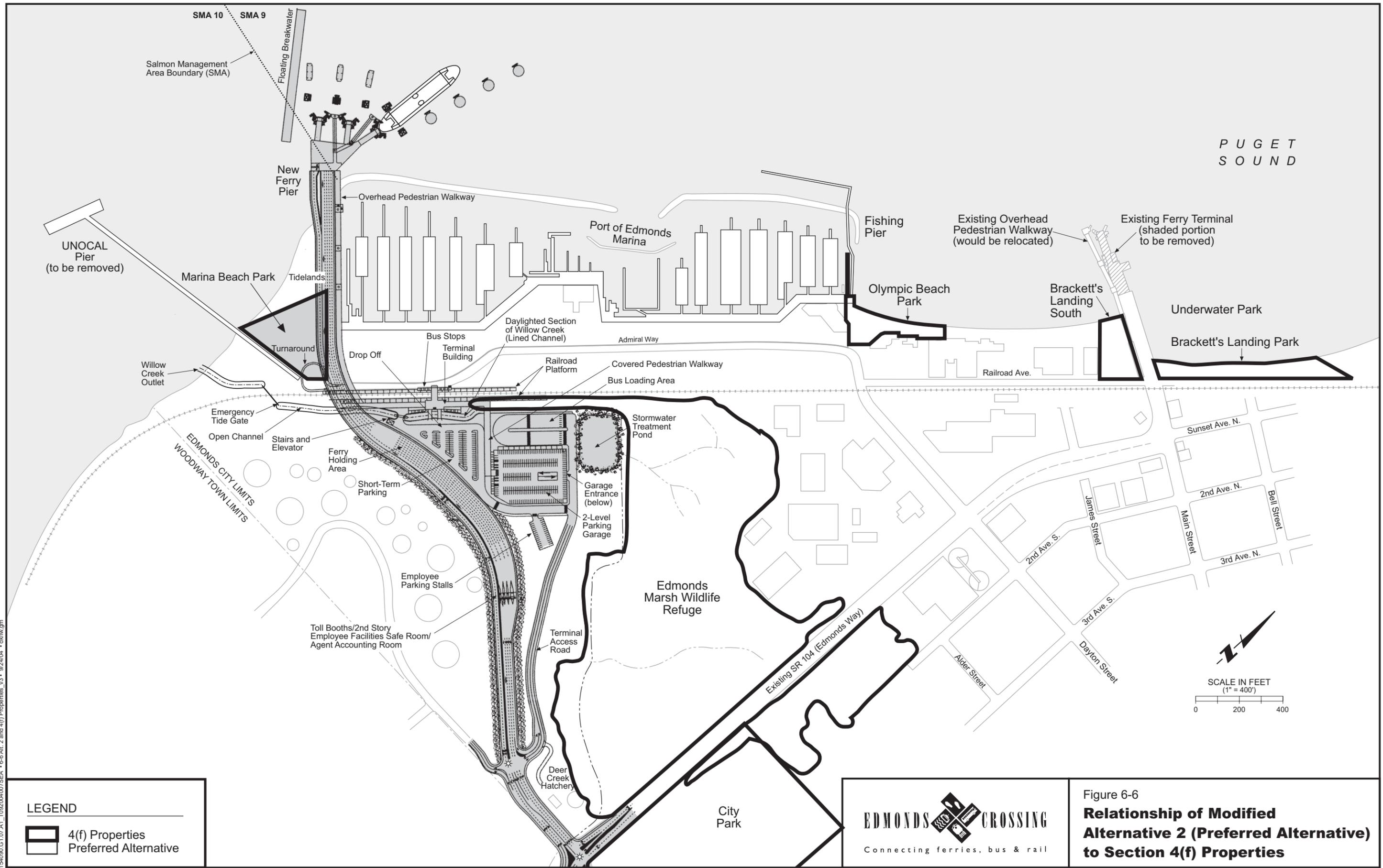
Users of Underwater Park and Brackett's Landing North and South parks would continue to be affected by the repetitive interruption and impediments to vehicular and pedestrian traffic along Railroad Avenue and Main Street. With increased ferry traffic, access to the parking area for these recreational facilities during ferry loading and/or unloading operations would be even more difficult than at present. The increase in ferry traffic would also result in greater potential safety hazards for divers at Underwater Park.

Because of additional traffic along the existing alignment of SR 104, City Park would experience an increase in noise levels of approximately 2 dBA (from an existing level of 53 dBA to 55 dBA). Increases at this level would not be expected to be noticeable to park users and the resulting level would be well below the FHWA noise abatement criterion for parks (67 dBA). The minor increase in noise would not preclude the continued use and enjoyment of this park and, therefore, it is concluded that there would be no constructive use of the park under this alternative.

6.6.2 Modified Alternative 2 (Preferred Alternative): Point Edwards Site

Brackett's Landing Park

There would be no direct use of Brackett's Landing Park associated with the Modified Point Edwards Alternative (Figure 6-6). There would actually be a number of benefits to the park. Without the congestion resulting from ferry traffic, access to the park would be greatly improved. Park users would no longer have close views of ferries arriving at and departing from the pier; however, the visual, noise, and air quality effects of queued automobiles would be eliminated, making the overall recreational experience more enjoyable. It is estimated that peak-hour



154090.G:1.07.A1_T082004075EA - 6-6 Alt. 2 and 4(f) Properties_v3 - 9/24/04 - dkl/wgm

LEGEND

- 4(f) Properties
- Preferred Alternative

EDMONDS CROSSING

Connecting ferries, bus & rail

Figure 6-6
Relationship of Modified Alternative 2 (Preferred Alternative) to Section 4(f) Properties

traffic noise levels in Brackett's Landing Park would decrease by approximately 11 dBA below existing levels (from 59 dBA to 48 dBA). A decrease in noise levels to that degree would be clearly perceptible to park users and would greatly increase the enjoyment of the facility. Potential transformation of the concrete portion of the existing pier property. While not park property, park users perceive it as an extension of the park (it includes the extension of the pedestrian walkway in the park that connects to the pedestrian bridge at the south end of the Marina). Clearances over this 0.1 acre into a public-use facility would enhance recreation opportunities and would provide an upland and beach link between the north and south properties.

Underwater Park

Like Brackett's Landing Park, there would be no direct use of Underwater Park, and there would be a number of benefits associated with this alternative. Vehicle access to parking would be similarly improved; in addition, the creation of a continuous public waterfront access from Brackett's Landing North through the existing ferry pier to Brackett's Landing South would afford more locations at which divers could enter the water. Of greatest benefit would be the elimination of the potential for safety conflicts between divers and ferries navigating near the dock.

Removal of ferry traffic would also allow the City to pursue opportunities to expand the Underwater Park, identified as a goal in the parks and recreation plan. The City Beach Ranger education program, facilitated in cooperation with the local schools, could be expanded. All of these changes would serve to enhance the site's unique features and its value to the City and surrounding community as a regional park.

Olympic Beach Park/Fishing Pier

The Modified Point Edwards Alternative would not result in a direct use of Olympic Beach Park. Lessening of traffic on SR 104 could allow easier access to Dayton Street, thereby facilitating access to the park.

Marina Beach Park

Unlike the Point Edwards Alternative presented and analyzed in the Draft EIS, the Modified Point Edwards Alternative would use Marina Beach Park. The ferry pier would be realigned, from the Draft EIS alignment, to straddle the boundary between Marina Beach Park and the Port of Edmonds Marina (Figure 6-7). The footprint of the elevated pier structure would require the acquisition of a roughly 50-foot-wide strip along the northern edge of the park between Admiral Way and the western edge of the existing grassy play area which defines the formal boundary of the park (a distance of 400 feet). A total of .42 acre of the park would be beneath the pier and would need to be acquired to accommodate the proposed improvements. This area would include the existing 23-space parking lot accessible from Admiral Way (approximately two-thirds of the area to be acquired) and a portion of the grassy play area immediately to the west (the remaining one-third of the area to be acquired). While .42 acre of the park would be acquired, only three columns supporting the ferry pier would actually be sited in the park and would occupy approximately 300 square feet of parkland. In addition, while the pier structure

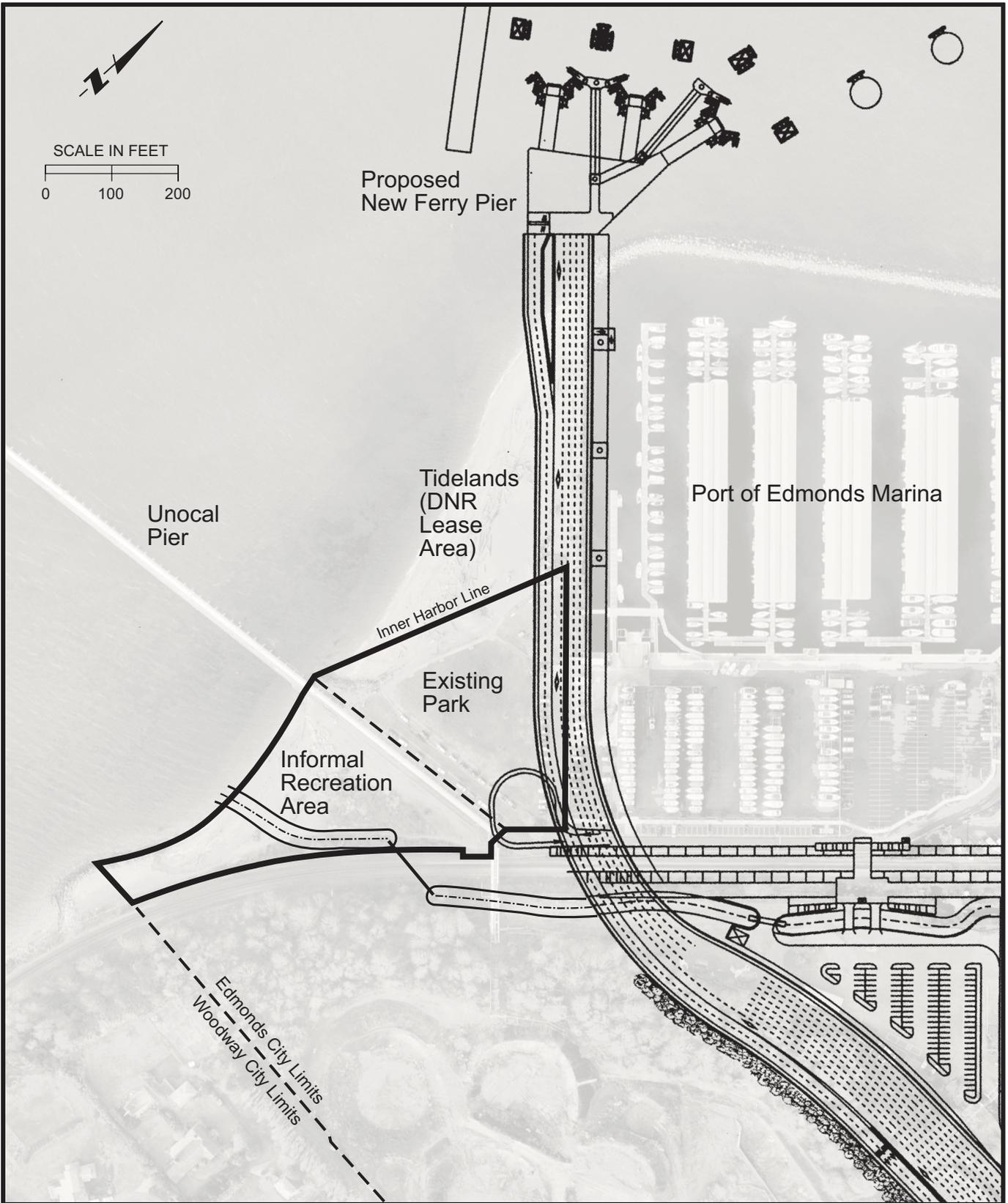


Figure 6-7

Impacts on Marina Beach Park with Modified Alternative 2 (Preferred Alternative): Point Edwards Site

would be over the park, it would be high enough above the existing ground level to allow for continued use of the park activities underneath. The clearance above the parking lot would range from 29 feet on the east to 19 feet on the west; the clearance above the grassy play area would range from 19 feet on the east to 14 feet on the west. A small portion of the grassy area that would also be beneath the proposed pier structure extends northward beyond the formal park boundary into Port of Edmonds parcel would be similar to the clearance noted above for the grassy play area within the park (ranging from 14 to 19 feet), thus allowing for continuation of current activities.

During the process of modifying the Point Edwards Alternative from that proposed in the Draft EIS, the feasibility of realigning the ferry pier even farther north (to avoid any direct use of the park) and completely within the Port of Edmonds Marina property was evaluated. The following discussion highlights the reasons why further realignment of the ferry pier is not prudent from a Section 4(f) perspective.

a. Effects on Port of Edmonds Operations

The Port Commission solicited input from marina users and the general public within the Port District on Modified Alternative 2. On March 10, 2003, the Port Commission approved Resolution 03-01 in support of the proposed alignment. The Commission stated that it was willing to share the effects of the project with the City. However, it was not willing to accept more than the effects posed by Modified Alternative 2.

The Port Commission opposes the avoidance alternative of moving the ferry pier farther north completely out of Marina Beach Park and totally within the Port of Edmonds Marina for the following specific reasons:

- A more northern ferry pier would cut through the upland dry stacked boat storage area immediately west of the railroad tracks. It is estimated that one entire row of storage would be acquired (up to 60 storage spaces, which is approximately 22 percent of all of the available dry storage spaces within the marina). Those 60 spaces generate approximately \$110,000 annually in revenue for the Port.
- Further west, the more northern pier would be so low as to make two existing docks unusable. The shorter dock provides tie-up slips for 12 boats and half of a longer dock provides an additional 14 tie-up slips. These slips are critical to the dry storage operation in that they provide space for boats that have been brought from the dry storage area or are waiting to be returned to dry storage. These slips do not directly generate revenue.
- The other half of the longer dock has 32 permanent tie-up slips. The loss of these slips would result in the loss to the Port of approximately \$55,000 each year.
- A more northern pier would require the relocation of the newly constructed \$3.8 million boat launch and support facilities. The boat launch is used to raise or lower boats that are kept in the dry storage area into or out of the water. To

adequately serve the dry storage area located in the south marina area, a relocated boat launch would need to be situated close to its existing location. This would force the displacement of other existing storage and related facilities. If the boat launch could not be relocated conveniently nearby, the 276-space dry storage facility would be closed. There is no other available space within the Port property to relocate this facility. This would result in a loss to the Port of \$510,000 in revenue each year.

- Moving the boat launch would require the creation of a new water passage between the boat launch and the marina entrance. To do so, an entire dock of 66 covered and uncovered boat slips would need to be removed, resulting in the additional loss to the Port of \$162,000 every year.
- A more northern ferry pier would also require even greater reconstruction of the marina breakwater, which would elevate the cost of construction associated with the project by an additional \$700,000.

To summarize, the Port could lose up to 124 tie-up slips that generate \$217,000 on an annual basis, 60 dry storage spaces that generate \$110,000 each year, and if the boat launch could not be relocated, the entire dry storage facility that generates \$510,000 per year, for a total of over \$835,000 in lost revenue annually. The Port estimates that this loss represents approximately 20 percent of its annual revenue. In addition to the lost revenue, three full-time and three part-time jobs would be lost, representing 17 percent of the current Port staff.

b. Effects on Indian Treaty Fishing Area

Based on extensive consultation with the Suquamish, Tulalip, Lummi, and Swinomish tribes, Modified Alternative 2 would result in the ferries operating along the north side of the Salmon Management Area (SMA) 9/10 boundary. This alternative would leave the ferries outside the popular tribal fishing area that is protected by treaty at the northern end of SMA 10 (SMA 9 is currently closed to fishing).

Further, the design of Modified Alternative 2 would create less impact to the marine habitat than a pier alignment further north. To clear the end of the Port's breakwater and to reach deeper water appropriate for vessel docking, a more northerly ferry pier would need to be slightly longer, increasing the amount of overwater shading. In addition, by moving the ferry pier northward, the ferry navigation route would also be shifted accordingly. By doing so, the potential for ferry and tribal shrimp fishery conflicts during the April shrimp harvest season would increase.

c. Effects on Marine Beach Park

While Marina Beach Park is a Section 4(f) resource and therefore is important, the impact is minor. The Port, IAC, and the general public have understood that despite the direct use (acquisition) of a portion of Marina Beach Park (0.42 acre, or approximately 9 percent of the total park area), the project use of that area would have a minimal effect on park activities.

The IAC stated in a letter dated February 26, 2003, (see Attachment 1) that it would support modified Alternative 2. The IAC “will work with the City of Edmonds to finalize the conversion process prior to award of the construction contract for Phase One of the Point Edwards Alternative.”

The clearance between the ground and the bottom of the ferry pier would allow for the continued use of most of the current park and associated parking, as well as Port activities. In addition to the height clearance, the pier structure would only occupy a small portion of the area acquired. Based on the current design of the pier, there would be three support columns sited within the park. Each column would require up to 100 square feet of land area, or approximately 300 square feet of parkland, or approximately .0015 percent of the entire park area. The acquired area not used for the pier supports would be available for continued park use. During operation, a contiguous beachfront would remain spanning south from Marina Beach Park to Olympic View Park in the town of Woodway.

Marina Beach Park is one of several links in a chain of parks along the City’s shoreline. In addition to Marina Beach Park, that chain includes Brackett’s Landing North, Brackett’s Landing South, and Olympic Beach Park. Each park has similar features, amenities, and usage. In view of this larger shoreline recreational base, the 0.42-acre of acquired parkland within Marina Beach Park represents only 3 percent of the total land area of these parks.

d. Relationship to Public, Government, and Tribal Coordination

The Modified Alternative 2 alignment reflects extensive project planning among the affected and interested parties (the affected tribes, City of Edmonds, the Port of Edmonds, the state of Washington Interagency Committee for Outdoor Recreation [IAC], and the public). In general, the coordinating parties have agreed that the modified pier alignment better balances potential effects to property and environmental resources. Government-to-government coordination resulted in the involvement of the affected tribes as cooperating agencies.

The Modified Alternative 2 was presented to the public in a project newsletter widely distributed throughout the community and at a public open house conducted in January 2003. In February 2003, the project was presented to the Edmonds City Council, to the Town of Woodway, and to the Port of Edmonds Commission. Comments received on the pier realignment indicated general support for the design modifications made to the project since the publication of the Draft EIS.

In summary, it is not prudent to move the proposed ferry pier further north out of Marina Beach Park and into the Port of Edmonds Marina because of the substantial physical and operational effects it would have on the Port of Edmonds Marina and on the Indian Treaty Fishing Rights, because the impact to Marina Beach Park is considered minor, and because of the considerable project planning among the affected and interested parties.

The bus turnaround proposed at the south end of Admiral Way would extend slightly into the eastern corner of the grassy area and the adjacent parking lot. Part of the turnaround would be beneath the pier structure, while most of it would be

uncovered. Approximately .05 acre (2,050 square feet) would be acquired to accommodate this facility.

The pier structure would extend westward from the western boundary of the park to the shoreline and the ferry terminal, a distance of approximately 500 feet. The tidelands west of the park boundary (the Inner Harbor line) to the shoreline is owned by the Washington State Department of Natural Resources (DNR) and leased by the City of Edmonds as an informal extension of Marina Beach Park. During lower tides, the sandy beach area is accessible to and visited by park users. The pier structure would cover approximately 0.69 acre of these tidelands, in addition to a slightly larger area of the tidelands that would be covered by the pier structure on the Port of Edmonds side of the Park/Port boundary line (primarily over the south marina breakwater). The distance between the bottom of the pier structure and the existing ground level would range from as high as 14 feet at the western edge of the park boundary to as low as 10 feet near the shoreline. The lower clearance closer to the shoreline may be considered too low to allow for safe activity.

In addition to the direct use of Marina Beach Park, the park would also experience some effects due to its proximity to the project. The proximity of the proposed pier structure, the vehicle traffic on the pier, and the bus turnaround area would have an effect on the current relatively isolated nature of the park. It is estimated that noise levels from peak-hour vehicle traffic and ferry operations would increase within the park by approximately 7 dBA above existing levels (from 51 dBA to 58 dBA). While an increase of 7 dBA would clearly be perceptible to park users, it would not constitute a "substantial" increase per the WSDOT Statewide Traffic Noise Analysis and Abatement Policy and Procedures. In addition, the resulting noise level would be well below the FHWA noise abatement criterion for parks and recreational land use (67 dBA). The increased noise would not preclude the continued use and enjoyment of this park. It is, therefore, concluded that there would be no constructive use of the park due to noise. Ambient levels of carbon monoxide (CO) from vehicle exhaust would also increase in the area, although these increases are not predicted to violate the ambient air quality standards for CO and thus no constructive use related to air emissions would be anticipated. While the Modified Preferred Alternative would arguably create more expansive views from the park toward Puget Sound compared to the Draft EIS Point Edwards Alternative (especially as a result of the removal of the existing UNOCAL pier), the Modified Point Edwards Alternative ferry pier structure would still be visible along the right side of views from the park toward Puget Sound (Figure 6-8).

In contrast, several benefits to Marina Beach Park could also result from construction at Point Edwards. As part of the project, the existing UNOCAL pier would be removed, thus opening up the view from the park toward Puget Sound. By placing the ferry pier along the northern edge of the park boundary and by removing the UNOCAL pier, a more expansive open space area could be created by integrating the existing Marina Beach Park with the recreation area south of the UNOCAL pier. Such expansion is recommended in the City's Parks, Recreation, and Open Space Comprehensive Plan.

Because the acquisition and development of a portion of Marina Beach Park involved the use of Section 6(f) of the Land and Water Conservation Act funds administered by the Washington State IAC, the City of Edmonds has begun the

Existing



Modified Alternative 2 (Preferred Alternative): Point Edwards Site



154090.G1.07.A1_T09204007SEA - 6-8 View from Marina Beach Park - 9/24/04 - dk/gm

EDMONDS CROSSING
Connecting ferries, bus & rail

Figure 6-8
**View from Marina Beach Park
(Section 4(f) Property)
Looking West**

formal conversion process (to a non-recreational use) with IAC by submitting a Conversion Request Package in February 2003. The package included the identification of suitable replacement property to the south of the existing UNOCAL pier. In response to the conversion request, the IAC indicated, in a letter dated February 26, 2003 (included in Attachment 1), that the agency "will work with the City of Edmonds to finalize the conversion process prior to award of the construction contract for Phase One of the Point Edwards Alternative." It should be noted that FHWA anticipates that the conversion process would be completed prior to the authorization of construction, or prior to advertising for construction bids.

Another aspect of this project that would create a benefit to the park would be the proposed daylighting of Willow Creek. The improvement of this natural resource would provide an attraction and amenity for park users that does not exist today, as well as an enhancement of salmon habitat.

Edmonds Marsh Wildlife Refuge

There would be no direct use of Edmonds Marsh Wildlife Refuge. Due to its proximity to the project, however, the marsh may experience some effects that could alter the site's character and its value as a bird and wildlife refuge. Traffic along the new roadway and holding area south of the marsh would increase substantially. Though dense trees along most of the roadway's length physically and visually buffer the marsh, the noise of cars would be audible from the site. No noise modeling was done for the marsh; because locations closer to traffic and ferry operations did not experience impacts in violation of FHWA noise criteria, it was assumed that the marsh also would not and thus the use of the marsh as a refuge would not be substantially impaired. As a result, no constructive use of the marsh would be anticipated. Noise increases that would occur would be expected to be greater in the vicinity of the proposed interpretive trail segment near the fish hatchery, which is closer to the new alignment than is the existing northern trail. None of the interpretive facilities currently existing would be affected by the project.

The primary visual effect of this alternative would be the multimodal center itself, which would be prominent from the interpretive trail and viewpoints on the northern edge of the marsh. Landscaping included in the project would, over time, screen the new features from the marsh to some degree. Therefore, no constructive use due to visual effects would be anticipated.

The marsh's habitat value could be affected by the project in several ways. Increased noise, traffic, structures, and lighting all have the potential to detract from the quality of existing habitat. Species sensitive to the proximity of development and human activity may be less likely to nest, feed, or roost in the area. However, the function of the marsh as a wildlife refuge would not be substantially impaired. Therefore, no constructive use of the marsh would be anticipated.

Likely benefits of the project to Edmonds Marsh Wildlife Refuge would include improved overall water quality and over the long term, enhanced habitat value, removal of the existing tidegate, and "daylighting" of Willow Creek.

City Park

There would be no direct use of City Park. As a result of increased traffic and turning movements along SR 104 near the park's southwest corner, it is estimated that peak-hour traffic noise levels would increase approximately 2 dBA above existing levels (from 53 dBA to 55 dBA). Increases at this level would not be expected to be perceptible. The resulting noise level would still be well below the FHWA noise abatement criterion for parks and recreational land use (67 dBA). In addition, the area of the park most likely to be affected by the increased noise is occupied by the park maintenance compound rather than recreational uses. The increased noise would not preclude the continued use and enjoyment of this park and, therefore, it is concluded that there would be no constructive use of the park under this alternative.

6.6.3 Alternative 3: Mid-Waterfront Site

Brackett's Landing Park

There would be no direct use of Brackett's Landing Park associated with the Mid-Waterfront Alternative. Because of the relocation of the existing ferry terminal, this alternative would have the same general benefits to the park as would the Modified Point Edwards Alternative (Figure 6-9): improved access, elimination of proximity effects, and a generally more enjoyable recreational experience.

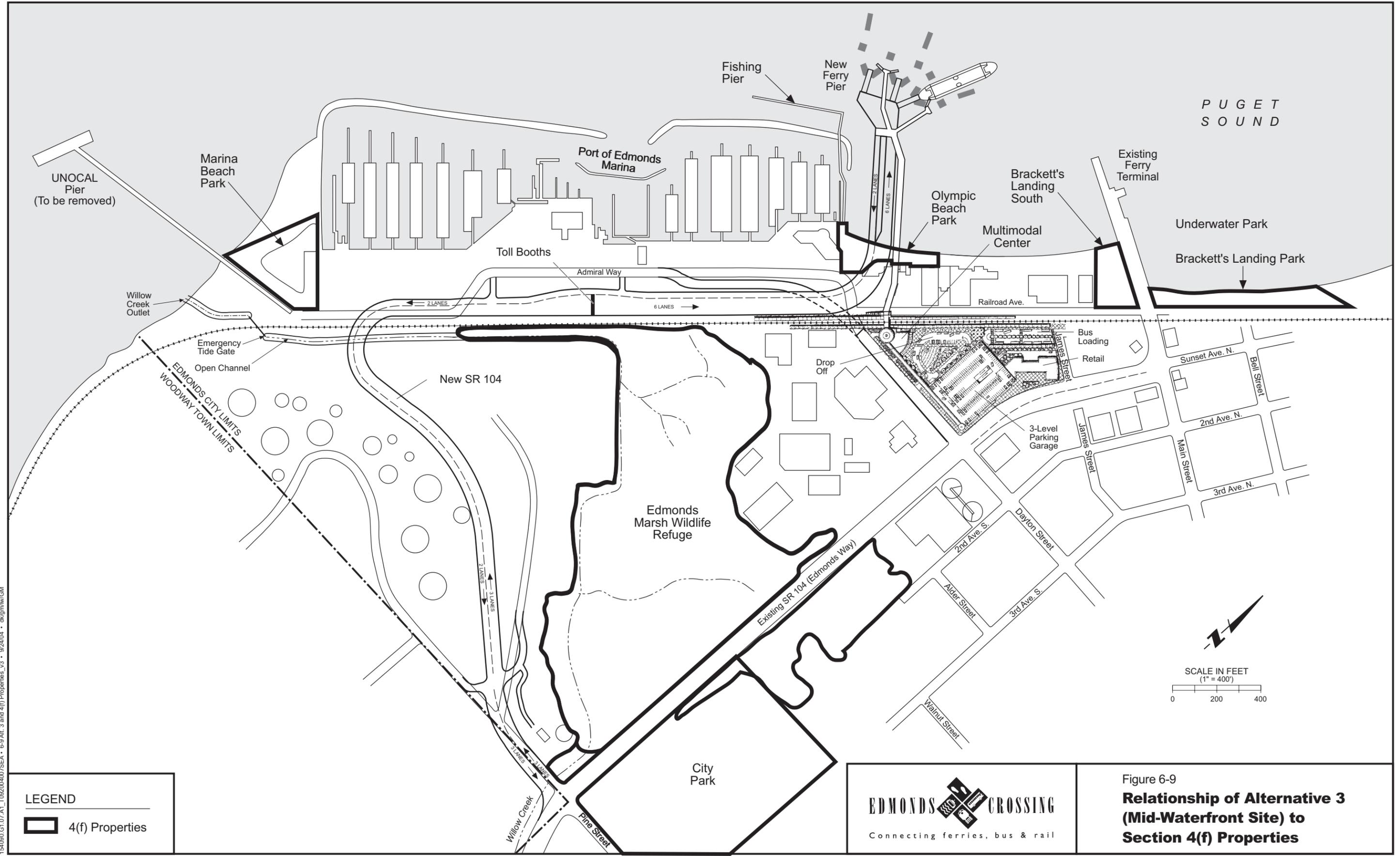
Underwater Park

There would be no direct use of Underwater Park. Benefits to Underwater Park would be similar to those at Point Edwards (improved vehicle access and elimination of potential safety conflicts between divers and ferries). Because ferry operations would still be relatively close to Underwater Park, expansion of the park to the south could be limited or infeasible.

Olympic Beach Park

The Mid-Waterfront Alternative would use Olympic Beach Park. Construction would require the acquisition of approximately 0.3 acre of uplands and 1.2 acres of tidelands from Olympic Beach Park as right-of-way for the ferry pier approach roadway (Figure 6-10). This alternative would, in effect, bisect the park, creating a 0.4-acre southern section and a 0.25-acre northern section. Because the roadway would be at-grade at this location, access from one side of the park to the other would have to be accomplished via an at-grade crossing of, or an elevated structure over, the ferry holding lanes. Access to the northern portion of the park would also be more difficult because a large area of the existing parking lot that serves both the park and nearby businesses would be displaced by the multimodal center. Access from Dayton Street would be eliminated. Development of a continuous waterfront esplanade from Brackett's Landing to Point Edwards, as proposed in the Downtown/Waterfront Plan, would be hindered by this alternative because of the large at-grade roadway bisecting the waterfront area.

1510090.G1.07.A1_T1092004007SEA - 6-9 Alt. 3 and 4(f) Properties_v3 - 9/24/04 - dk/gm/lv/GM



PUGET SOUND

SCALE IN FEET
(1" = 400')

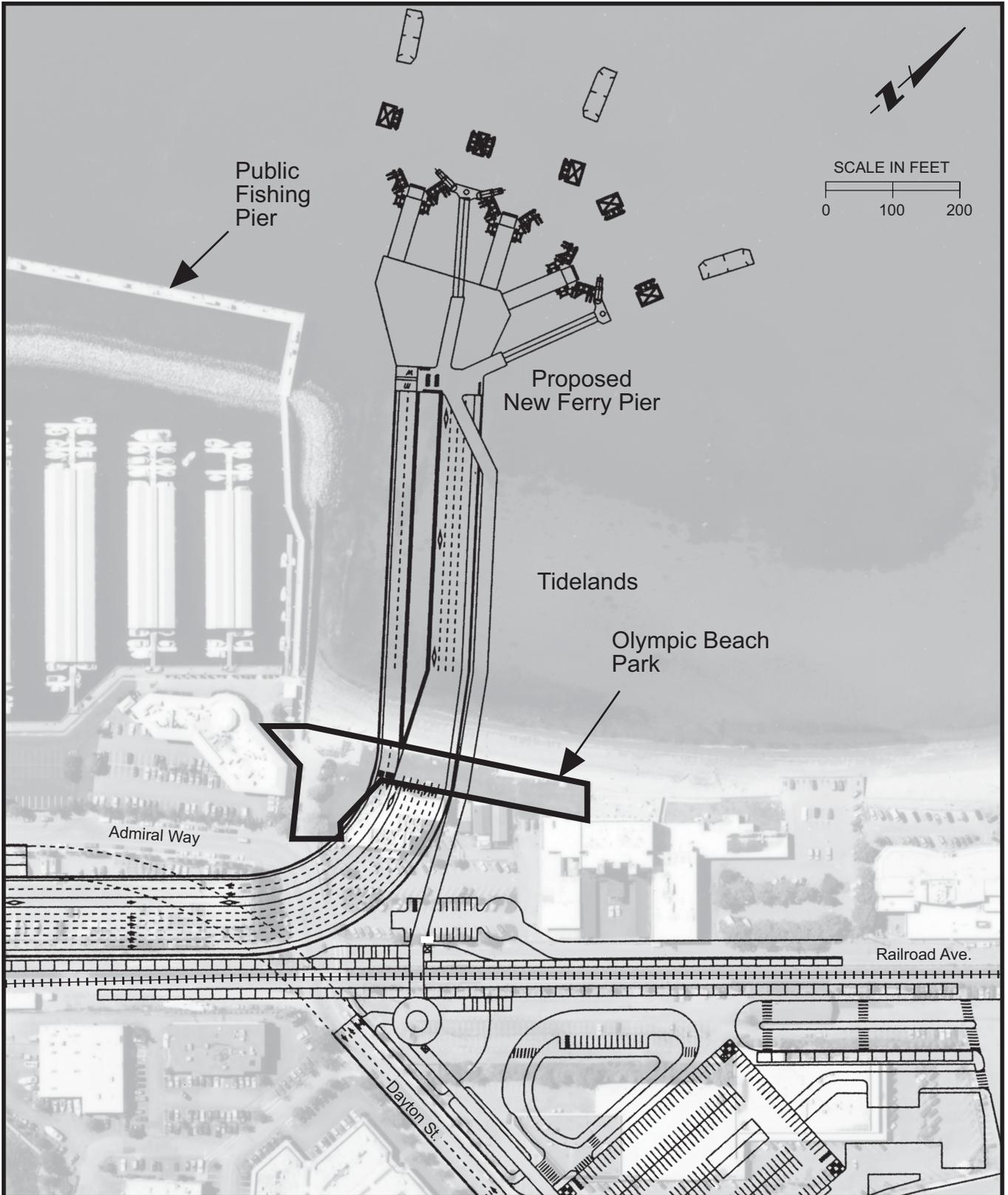
LEGEND

 4(f) Properties

EDMONDS CROSSING

Connecting ferries, bus & rail

Figure 6-9
Relationship of Alternative 3 (Mid-Waterfront Site) to Section 4(f) Properties



154090.G1.07.A1_T082004007SEA - 10 Olympic Beach Park Detail - 9/24/04 - dk/gm

EDMONDS CROSSING
 Connecting ferries, bus & rail

Figure 6-10
Impacts on Olympic Beach Park with Alternative 3 (Mid-Waterfront Site)

In addition to right-of-way acquisition, fragmentation, and loss of access, Olympic Beach Park would experience the effects of its proximity to the project. It is estimated that noise levels due to peak-hour vehicle traffic and ferry operations would increase approximately 8 dBA above existing levels (from 57 dBA to 65 dBA) within the remaining two sections of the park. While an increase of 8 dBA would clearly be perceptible to park users, it would not constitute a "substantial" increase per the WSDOT Statewide Traffic Noise Analysis and Abatement Policy and Procedures. In addition, the resulting noise level would be below the FHWA noise abatement criterion for parks and recreational land use (67 dBA). The increase noise should not preclude the continued use and enjoyment of this park. It is, therefore, concluded that there would be no constructive use of the park due to noise.

Views from the park, currently of nearby businesses, the fishing pier, ferry traffic in the near distance, and the Olympic Mountains, would become dominated by vehicles, loading structures, and the large pier. The remaining portions of the park could also experience increased use by waiting ferry passengers. The combination of these proximity effects with the small size of the remaining park fragments may diminish the park's present value to the community, although it would probably receive some use from waiting ferry passengers whose cars were parked in the holding lanes.

The presence of the ferry terminal nearby could also affect the public fishing pier. Fish are now making use of areas near the pier for feeding or habitat could move elsewhere as a result of increased noise, vibration, and pollutants from the ferries, making fishing conditions less favorable. The force of the boats' propellers could also create the potential for damage to the fishing pier itself. Monitoring would be required if this alternative were implemented to determine the need for measures to protect affected structures.

Because the acquisition and development of Olympic Beach Park involved the use of Section 6(f) of the Land and Water Conservation Act funds administered by the Washington State IAC, the City of Edmonds will need to prepare a formal Conversion Request Package, identifying suitable replacement property, if this alternative is eventually selected as the preferred alternative. Potential replacement sites would be identified in coordination with the City of Edmonds Parks and Recreation Division, with consideration given to City priorities as established in the *Parks, Recreation, and Open Space Comprehensive Plan*.

Marina Beach Park

There would be no direct use of Marina Beach Park associated with the Mid-Waterfront Alternative. While the access roadway to the ferry pier would be approximately 300 feet from the eastern edge of the park, it is estimated that peak-hour vehicular noise levels in the park would increase by 1 dBA above existing levels (from 51 dBA to 52 dBA); an increase at this level would not be expected to be perceptible to park users and the resulting noise level would be well below the FHWA noise abatement criterion for parks and recreational land use (67 dBA). The increased noise should not preclude the continued use and enjoyment of this park. It is, therefore, concluded that there would be no constructive use of the park.

Edmonds Marsh Wildlife Refuge

There would be no direct use of Edmonds Marsh Wildlife Refuge associated with this alternative. However, the access roadway would be relatively close to the wetland, increasing the potential for habitat removal and disturbance of species sensitive to human activity. In addition, the wide access roadway to the ferry pier would be extended along the western edge of the marsh, effectively surrounding it with traffic activity. Overall, the effects resulting from the roadway's presence would be similar to those described for Point Edwards, but their magnitude would likely be greater because of the greater number and proximity of high-intensity activities. However, as with the Point Edwards alternative, the function of the marsh as a wildlife refuge should not be substantially impaired and, therefore, no constructive use would be anticipated.

City Park

There would be no direct use of City Park. The proximity effects on City Park (heightened noise levels due to increased traffic and turning movements along SR 104) would be similar to those described under Modified Alternative 2 (Point Edwards). The increased noise would not preclude the continued use and enjoyment of this park. It is, therefore, concluded that there would be no constructive use of the park.

6.6.4 Construction

Construction of either build alternative (Modified Point Edwards or Mid-Waterfront) would result in the temporary occupancy of parkland. In accordance with 23 CFR 771.135(p)(7), a temporary occupancy of land is so minimal that it does not constitute a use within the meaning of Section 4(f) when the following conditions are satisfied:

1. Duration must be temporary (i.e., less than the time needed for construction of the project), and there should be no change in ownership of the land
2. Scope of work must be minor (i.e., both the nature and magnitude of the changes to the resource are minimal)
3. There are no anticipated permanent adverse physical impacts, nor will there be interference with the activities or purposes of the resource on either a temporary or permanent basis
4. The land being used must be fully restored (i.e., the resource must be restored to a condition which is at least as good as that which existed prior to the project)
5. There must be documented agreement of the appropriate official having jurisdiction over the resource regarding the above conditions.

Regarding the Modified Point Edwards Alternative and Marina Beach Park, some construction activity related to the proposed ferry pier would necessarily occur

within the park. It is anticipated that all such construction activities would occur within the footprint of the pier structure (that area would be permanently acquired as previously described) and within an area approximately 25 feet of the footprint. That 25-foot-wide strip of land (approximately 0.23 acre or 5% of the park) would be fenced and temporarily occupied during that portion of the overall project construction program related to the construction of the pier. During the temporary occupancy, the land would remain in the ownership of the City of Edmonds. During the construction period, recreational facilities currently located within the fenced area would be moved to allow for continued use by recreationalists. Access to the park would be maintained to the greatest extent possible. During construction over Admiral Way, that roadway access into the park would likely be closed periodically; pedestrian access would be provided and alternative parking would be available on adjacent Port of Edmonds property. Except for the fenced area, the remainder of the park (3.8 acres) would be open, accessible, and usable for the activities and purposes intended. After construction, all areas fenced and disturbed during construction would be fully restored to a condition which would be at least as good as that which existed prior to the project.

Regarding the Mid-Waterfront Alternative and Olympic Beach Park, construction of the ferry pier through the center of the park would necessitate construction-related activity to occur within the footprint of the ferry access roadway (that area would be permanently acquired as previously described) and within an area approximately 25 feet on either side of the footprint (similar to the area envisioned at Marina Beach Park). This area (approximately 0.11 acre, or 2.6% of the park) would be fenced and temporarily occupied during that portion of the overall project construction program related to the access roadway. During the temporary occupancy, the land would remain in the ownership of the City of Edmonds. During the construction period, recreational facilities currently located within the fenced area would be moved to allow for continued use by recreationalists. Access to the northern portion of the park would remain via Railroad Avenue; access to the southern portion of the park would be via Dayton Street and Admiral Way. Except for the fenced area, the remainder of the park (0.34 acre in the southern section and 0.19 acre in the northern section) would be open, accessible, and usable for the activities and purposes intended. After construction, all areas fenced and disturbed during construction would be fully restored to preconstruction condition.

The conclusion is that because the construction period would be of relatively short duration, there would be no permanent adverse impacts, recreational facilities would be relocated to allow for continued use during construction, and the land would be fully restored, the temporary occupancy of either park would not constitute a use.

In terms of the effect of construction activities as a result of proximity to the parks, in both cases the parks would be subject to increased noise. Typical noise levels that would occur at a distance of 50 feet would range from 88 to 105 dBA during short periods of time. At the upper limit of that noise range would most likely be the occasional pile driving of pilings in the water. The western edge of Marina Beach Park is approximately 500 feet from where the pile driving would occur; the resulting noise level at that distance is estimated at 84 dBA (based on the attenuation of a "point" noise source of 6 dBA with each doubling of the distance from the noise source). This would be the maximum noise level at the time of

occurrence and in the case of piling driving would be intermittent in nature. Because of the short duration expected, no constructive use of Marina Beach Park is anticipated. Pile driving with the Mid-Waterfront Alternative could occur as close as 100 feet from the western edge of Olympic Beach Park and the fishing pier. The resulting noise level at this distance is estimated at 99 DBA. While this level would exceed the FHWA noise abatement criterion for parks and recreational land use, these higher levels would be experienced only periodically and for short durations. (As mitigation for the potential effects of pile driving, a number of steps would be taken, including advance planning and warning of pile driving events so that these events would occur when the least effect to park users would be experienced and continued monitoring to ensure that a substantial impairment of park activities would not occur.) As a result, no constructive use of Olympic Beach Park is anticipated.

6.7 Section 4(f) Resource Avoidance Alternatives

Under the requirements of Section 4(f), the FHWA may not approve the use of land from either Marina Beach Park (with the Modified Point Edwards Alternative) or Olympic Beach Park (with the Mid-Waterfront Alternative) unless a determination is made that there are no feasible and prudent alternatives to the use of land from the property (as well as a determination that the project includes all possible planning to minimize harm to the property resulting from such use). The following discussion presents several alternatives that would avoid the Section 4(f) properties and the reasons why these alternatives are not considered feasible and prudent.

As described in Chapter 1 of this EIS, the objectives for the Edmonds Crossing project are based on the specialized and unique requirements of a multimodal transportation facility. Specific objectives for this project include:

- **Objective 1:** A ferry terminal that meets patron needs and the operational requirements to accommodate forecast ridership demand, that has two landing slips, and that separates the auto and walk-on passenger loading.
- **Objective 2:** A train station that meets intercity service and commuter rail loading requirements and that provides the requisite amenities such as waiting areas and storage.
- **Objective 3:** A transit center that meets local bus system and regional transit system loading requirements.
- **Objective 4:** A connectivity or linkage system between these stations/terminals that meets the operational and safety requirements of each mode and the business/commerce center in downtown Edmonds.
- **Objective 5:** Safety features that include grade separation between train traffic and other modes of travel, particularly the vehicle and passenger ferry traffic, and between train traffic and the general public.

While mainly related to the operational requirements of the various transit modes that would use the proposed facility, these objectives define a host of siting

constraints (including site size, access, and location with respect to existing transit facilities) that influence the range of Section 4(f) avoidance alternatives that could potentially be considered “feasible” and “prudent.” Siting requirements of the facility itself are influenced by both marine issues such as depths, currents, and patterns of ship traffic and landside issues such as access to the site by buses, trains, and passenger vehicles. In addition, the location of the new ferry terminal needs to be relatively close to the existing terminal so as not to increase the ferry travel times to and from Kingston and reduce the number of ferry trips to and from Kingston possible in a single day. Because of these numerous requirements and constraints, feasible sites for a multimodal facility in the project area are limited. In addition, the tendency for parks to be clustered in downtown waterfront areas, as they are in Edmonds, poses an extreme difficulty in identifying potential project sites that do not in some way affect parklands.

6.7.1 Avoidance Alternatives Considered But Rejected

Based on the proposed project's stringent siting requirements, a limited number of alternatives were evaluated. Each alternative was analyzed in terms of whether it was a true avoidance alternative, whether it was feasible from an engineering standpoint, and whether it was prudent. The seven alternatives evaluated were:

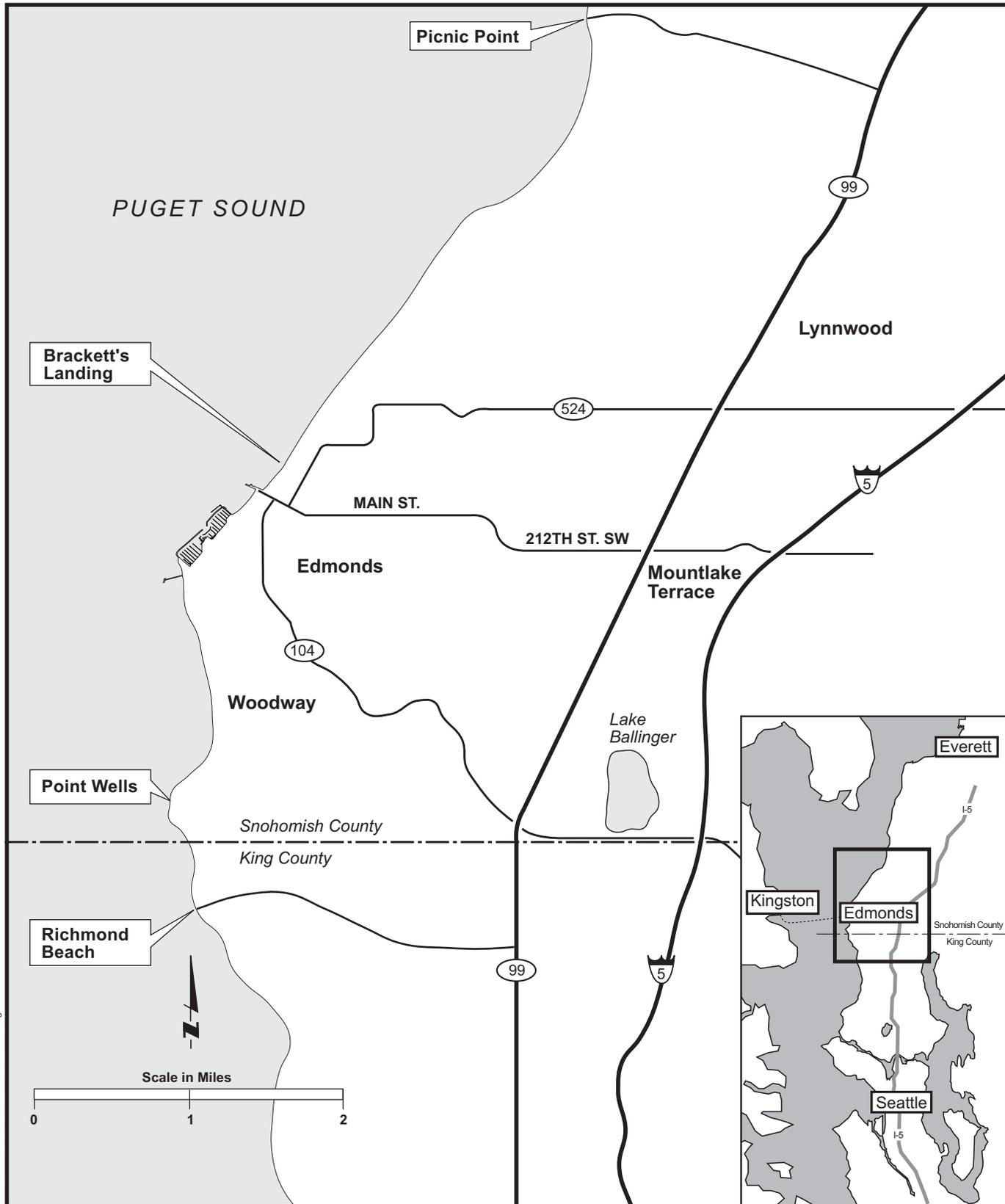
- Picnic Point
- Richmond Beach
- Point Wells
- Main Street
- Brackett's Landing North
- Cross-Sound Bridge
- UNOCAL Pier

These sites are identified in Figure 6-11. The results of the evaluation are summarized in Table 6-3.

Picnic Point

Picnic Point is located approximately 5 miles north of downtown Edmonds (Figure 6-11). Access is via Picnic Point Road, a narrow two-lane roadway that would require extensive and costly improvements in order to safely and conveniently serve ferry traffic. Connections between Picnic Point Road and the regional highway system (primarily SR 99) are provided by Shelby Road and Beverly Park-Edmonds Road, both of which are local roadways that would also require extensive and costly improvements to convey projected ferry traffic volumes.

Although development of a multimodal center at Picnic Point could be accomplished without the use of Section 4(f) properties, the site does not meet many of the project objectives. Picnic Point itself has little existing or planned development in its immediate vicinity, and is not conveniently located near any major population or employment concentrations. Access to the area requires considerable out-of-direction travel for all commuter flows of any consequence; as a result, the site would be difficult and inefficient to serve with transit. Also, no



154090.G1.07.A1_T0922004007SEA - 6-11 Alternative Sites - 9/24/04 - dk/gm

EDMONDS CROSSING
 Connecting ferries, bus & rail

Figure 6-11
**Rejected Avoidance
 Alternative Sites**

Table 6-3 Results of Avoidance Alternatives Evaluation	
Alternative	Primary Reasons for Rejection
Picnic Point	<ul style="list-style-type: none"> • Extensive and costly access road improvements • Little existing or planned development in immediate vicinity • Not conveniently located near any major population or employment concentration • Difficult and inefficient to serve with transit • Ferry travel times to and from Kingston would double—would reduce the number of daily crossings
Richmond Beach/ Point Wells	<ul style="list-style-type: none"> • Extensive and costly access road improvements • Required acquisition of residential properties along access roads • Lacks trip-attracting commercial activity • Not located on or near major commuter routes • Limited transit potential
Main Street	<ul style="list-style-type: none"> • Would use (through property acquisition) a portion of Brackett's Landing South Park • Loss of access to properties along Railroad Avenue • Further endanger recreational use of adjacent parks
Brackett's Landing	<ul style="list-style-type: none"> • Would use Brackett's Landing North Park • Continue to disrupt traffic in downtown Edmonds • Continue to separate downtown from the waterfront • Displacement of 13 commercial and residential properties
Cross-Sound Bridge	<ul style="list-style-type: none"> • Considered infeasible due to insufficient future demand, length of crossing, marine traffic impacts, and associated costs • Inconsistent with transportation plans
UNOCAL Pier	<ul style="list-style-type: none"> • Bisected future larger park facility • Operation of ferry vessels in the middle of tribal fishing area protected by treaty

commuter rail station currently is planned for Picnic Point, which would make it impossible for ferry riders to transfer to and from Seattle-Everett commuter rail service. Finally, Picnic Point is located approximately 5 miles north of the existing Edmonds terminal. The ferry travel time to and from Kingston would double and thus reduce the number of ferry trips that could be operated each day. Because of its

failure to meet the project objectives and the other reasons stated, Picnic Point is not considered a feasible or prudent alternative from a Section 4(f) perspective.

Richmond Beach and Point Wells

The Richmond Beach and Point Wells sites are located approximately 2 to 3 miles south of downtown Edmonds (Figure 6-11). Access to Richmond Beach and Point Wells from the regional highway system (SR 99) would be via NW Richmond Beach Drive, NW 195th, and NW 196th, all of which pass through a fully developed Richmond Beach residential neighborhood. The *King County Arterial Functional Classification Plan* classifies NW Richmond Beach Drive and NW 195th as minor arterials and NW 196th as a collector arterial. Neither of these arterial classifications is designed to serve regional through-traffic traveling to and from a ferry terminal; consequently, costly upgrades of the roadways would be required. The needed improvements would require the acquisition of part or all of numerous residential properties along the access roadways. In addition, the adjacent properties would experience noticeable increases in noise and air pollution levels. Access to I-5 (to/from the south) would be via North 175th Street, which is classified as a major arterial but has heavy traffic volumes and congestion problems.

Like the Picnic Point alternative, the Richmond Beach/Point Wells alternative could be sited to avoid uses of Section 4(f) properties, but would fail to meet several of the project objectives. The Richmond Beach waterfront lacks trip-attracting commercial activity (it is surrounded by residential development); it is not located on or near any major commuter routes; and, with no bus activity in the area, the transit potential of the terminal site would be limited mainly to ferry and rail commuters. A commuter rail station is planned for the Richmond Beach area so if the ferry terminal were to be located here, ferry riders could transfer to and from Seattle-Everett commuter rail service. However, the potential commuter rail ridership market is limited by geography and by “competition” from transit service in the I-5 corridor. Because it does not meet the project’s objectives and for the other reasons stated, a Richmond Beach/Point Wells site is not considered a feasible or prudent Section 4(f) avoidance alternative.

Main Street

This alternative entailed the construction of a new multimodal center at the existing Main Street ferry terminal location. Access for this alternative would have been via a realigned SR 104 from Pine Street and through the existing UNOCAL site (similar to the Point Edwards and Mid-Waterfront alternatives), and then along the westside of the BNSFRR tracks to Main Street (essentially using the Railroad Avenue right-of-way). Since this alternative was first considered, Brackett's Landing South Park has been developed. This alternative would use (through property acquisition) a portion of this park and, thus, would no longer be considered a Section 4(f) avoidance alternative. In addition, other properties along Railroad Avenue between Main Street and Dayton Street would also be impacted (primarily as a result of the loss of access), including businesses and housing and a community center for senior citizens. Widening and extending the Main Street pier would also have further endangered the current recreational uses of the area beaches and Underwater Park.

Because it is no longer an avoidance alternative and for the other reasons stated, this alternative is not considered a feasible or prudent alternative.

Brackett's Landing

Another alternative site that was considered early in the development of the project was just north of the existing Main Street terminal site. The concept was to use the existing ferry access route (SR 104-Edmonds Way) and vehicle holding area (between Dayton Street and Main Street) and to route ferry traffic north along Sunset Avenue to a grade-separated structure over the BNSFRR railroad tracks to access a new pier generally along the alignment of Bell Street. This alternative would have continued to disrupt traffic in the Edmonds downtown area and continued to separate the downtown from the waterfront (two specific issues inconsistent with the City of Edmonds comprehensive and transportation plans and that the project is intended to address). In addition, virtually all of the existing commercial and residential properties bounded by Main Street on the south, Sunset Avenue on the east, Bell Street on the north, and the railroad tracks on the west would need to be acquired to accommodate the proposed improvements. Since this alternative was first considered, Brackett's Landing North Park has been expanded and upgraded. This alternative would now split Brackett's Landing Park and, thus, would no longer be considered a Section 4(f) avoidance alternative. For that reason and the other reasons stated, the Brackett's Landing site is not considered a feasible or prudent Section 4(f) avoidance alternative.

Cross-Sound Bridge

Although technically not a terminal site alternative, a cross-sound bridge or tunnel has been suggested in the past as an alternative to Edmonds-Kingston ferry service. Such a direct roadway link would eliminate the need to accommodate ferry service at a multimodal center in Edmonds. However, to fulfill the project's objectives, a center to serve commuter rail, train, and transit would still be needed. Furthermore, vehicular traffic to and from the bridge/tunnel would likely exceed ferry traffic volumes, significantly affecting the arterial access routes.

An Edmonds-Kingston roadway link was most recently considered in the *1992 Cross Sound Transportation Study* prepared by the Washington State Transportation Commission. The study concluded that "bridges, tunnels, and sunken tubes are infeasible for the Edmonds-Kingston crossing due to insufficient future demand, the length of crossing (5.2 miles), marine traffic impacts, and associated costs." An Edmonds-Kingston roadway link is also inconsistent with the Transportation Element of Vision 2020 (the growth and transportation strategy for the Central Puget Sound region), which includes only ferry improvements for Edmonds-Kingston and specifically excludes a roadway link. Because of its failure to meet the project objectives and the other reasons stated above, this alternative is neither feasible nor prudent as a method of avoiding impacts to 4(f) properties.

UNOCAL Pier

This alternative was an earlier variation of the current Modified Point Edwards Alternative; it was studied in the Draft EIS issued in 1998. The proposed ferry pier

would extend along the alignment of the existing UNOCAL pier. Otherwise, this alternative is identical to the Modified Alternative 2. In 1998, this alternative appeared to avoid direct use of Marina Beach Park. However, it has been subsequently concluded that it would potentially bisect a larger park facility envisioned with the integration of the existing park and the informal recreation area to the south of the UNOCAL pier. While feasible from an engineering standpoint, based on comments on the Draft EIS, it was concluded that this alternative was not prudent because the placement of the ferry pier would have resulted in the operation of ferry vessels in the middle of a popular tribal fishing area protected by treaty rights. The resulting potential conflict between ferries and fishing boats could have adversely affected the tribal economy as a result of fewer fish caught. As a result, this alternative was dropped from further consideration and replaced with the Modified Point Edwards Alternative addressed in this Section 4(f) Evaluation.

Summary of Avoidance Alternatives

Based on the evaluation of the avoidance alternatives discussed above, it is concluded that there are no feasible and prudent alternatives to the use of land from the Section 4(f) properties. The alternative sites considered in this Section 4(f) Evaluation meet the project objectives, continue to rely on the investment already made in access roadways, are close to a center of population and activity, offer opportunities for urban redevelopment, will ensure adherence to the current ferry schedule, and are feasible from an engineering standpoint. While neither alternative evaluated in this Section 4(f) Evaluation avoids Section 4(f) properties, Section 4(f) is clear that if there are no feasible and prudent avoidance alternatives, other alternatives that reflect all possible planning to minimize harm may be selected as the preferred alternative. As will be noted below, the proposed action (Modified Point Edwards Alternative) reflects all possible planning to minimize harm to Marina Beach Park.

6.8 Measures to Minimize Harm

Under the requirements of 23 USC Section 138, use of 4(f) properties that cannot be avoided must be minimized, or mitigated, to the greatest possible extent. Several design refinements have been incorporated into the Modified Point Edwards Alternative to avoid or minimize impacts to Section 4(f) properties. For example, in order to minimize the acquisition requirements along the northern edge of Marina Beach Park, the width of the ferry pier structure was reduced from 115 feet to 89 feet. This narrowing of the structure footprint was possible by shifting more of the vehicle storage capacity farther upland and to the east of the railroad tracks. In addition, the pier structure has been elevated high enough above the ground level to allow for continued use of the park beneath. In order to avoid or minimize proximity effects to Edmonds Marsh, the dedicated bus driveway, proposed in the Draft EIS, that extended from the multi-modal center northward between the BNSFRR right-of-way and the marsh was eliminated, thus precluding possible encroachment into the marsh. In addition, the access road to the center was shifted as far south as possible to avoid use of or proximity effects to the marsh. As the design of the project proceeds and is finalized, additional design refinements will likely be identified and incorporated into the project. Where impacts were unavoidable,

proposed mitigation measures are listed below. Planning, design, and implementation of committed mitigation measures will be coordinated with the City of Edmonds Parks and Recreation Department to ensure consistency with the City's identified parks planning priorities.

6.8.1 Modified Alternative 2 (Preferred Alternative): Point Edwards Site

Marina Beach Park

The following measures will be taken to mitigate for impacts:

- Replace acquired parkland with property of equal fair market value and recreational utility, as specified in Section 6(f) of the Land and Water Conservation Act. Replacement land will be acquired in the informal recreational area south of Marina Beach Park (although a portion of the park would be covered by the ferry pier structure, much of the covered area would continue to be accessible and usable for park uses).
- Integrate this new parkland with the existing park to create an integrated and more expansive recreational facility.
- Install interpretive signs within the park and along the daylighted section of Willow Creek that describe the cultural history of the site, natural resource features, and the role of the creek in salmon survival.
- Provide continued access to the park in a manner mutually agreeable to the City of Edmonds, the Port of Edmonds, and WSDOT.
- Provide handicap-accessible pedestrian access to the park from the multimodal center by a pedestrian stairway or other means.

Edmonds Marsh Wildlife Refuge

The following measures will be taken to mitigate for impacts:

- Provide stormwater treatment and control facilities to improve water quality and maintain peak flow runoff rates into marsh at existing levels.
- Place appropriate plantings adjacent to the ferry access road to buffer habitat and interpretive areas.

6.8.2 Alternative 3: Mid-Waterfront Site

Olympic Beach Park/Fishing Pier

The following measures will be taken to mitigate for impacts:

- Replace acquired park land with property of equal fair market value and recreational utility, as specified in Section 6(f) of the Land and Water

Conservation Act. The replacement land will be identified in consultation with the Edmonds Parks and Recreation Department.

- Reconnect severed portions of the park by means of an at-grade crossing of, or an elevated structure over, the ferry holding lanes.

Edmonds Marsh Wildlife Refuge

The mitigation measures described for the Modified Point Edwards Alternative will also apply to the Mid-Waterfront Alternative. The extent of mitigation undertaken will be commensurate with the level of actual impact under the chosen alternative.

6.9 Coordination

In accordance with Section 4(f) guidance, the City of Edmonds Parks and Recreation Department Manager (the local official with jurisdiction) was consulted for guidance and concurrence on the attributes and significance of identified 4(f) properties. See the letter from the Parks and Recreation Department Manager in Attachment 1. The Parks and Recreation Manager is responsible for administration of the entire City park system, which also includes the Edmonds Marsh Wildlife Refuge and the designated marine sanctuary areas in the tidelands portions of City waterfront parks.

Because the acquisition and development of portions of both Marina Beach Park and Olympic Beach Park would involve the use of Section 6(f) of the Land and Water Conservation Act funds administered by the IAC, the IAC has been coordinated with throughout the EIS process. As a result of the fact that the preferred alternative (Modified Point Edwards Alternative) would require use of that portion of Marina Beach Park recently funded by the IAC, the City of Edmonds made initial informal contact with IAC staff to determine further steps in the land conversion process. Based on those discussions, a formal Conversion Request Package was submitted to the IAC in February 2003. The package included information on the need for conversion to a nonrecreational use, the impacts and benefits of the conversion, the evaluation of possible alternatives to conversion, and the identification of suitable (equal fair market value and recreational utility) replacement property to the south of the existing UNOCAL pier. In response to the conversion request, the IAC indicated, in a letter dated February 26, 2003 (included at the end of this chapter), that the agency “will work with the City of Edmonds to finalize the conversion process prior to award of the construction contract for Phase One of the Point Edwards Alternative.”

6.10 Section 4(f) Conclusion/Finding

The Preferred Alternative, Modified Alternative 2, would use Marine Beach Park. A total of 0.42 acres of the park beneath the ferry pier would be acquired (approximately 9 percent of the total park area). The acquired area currently contains a portion of a parking lot and part of a grassy play area. While 0.42 acre would be acquired, only three columns supporting the pier would actually be sited in the park and would occupy approximately 300 square feet. In addition, while the

pier structure would be over the park, it would be high enough over the existing ground level to allow for continued use of the park activities underneath. While the park would experience additional effects due to its proximity to the project, it was concluded that the increased noise and air pollution levels and changed visual environment would not preclude the continued use and enjoyment of the park and that, therefore, no constructive use would be anticipated.

While there would be no direct use of the Edmonds Marsh Wildlife Refuge by the Preferred Alternative, the marsh may experience some effects related to traffic noise and visual degradation due to its proximity to the project. The conclusion of this evaluation is that the use and function of the marsh as a wildlife refuge would not be substantially impaired and, therefore, that no constructive use would be anticipated.

Based on the extensive evaluation of avoidance alternatives, WSDOT concluded that there were no feasible and prudent alternatives to the use of land from the Section 4(f) properties. The avoidance alternatives considered were found to not achieve the purpose of the project and/or to cause other environmental, social, economic, and/or cost impacts of an extraordinary magnitude. Based on consultation with FHWA, the Port of Edmonds, and the local official with jurisdiction regarding ownership and management of the affected Section 4(f) properties (the City of Edmonds), it was further concluded that while the Preferred Alternative was not an avoidance alternative, it was a feasible and prudent alternative.

In addition, the Preferred Alternative reflects all possible planning to minimize harm to Section 4(f) properties. To minimize impacts, several design refinements have been incorporated, such as:

- Narrowing the width of the ferry pier
- Elevating the ferry pier high enough above the ground level to allow continued use of the park beneath
- Eliminating of a dedicated bus driveway along the western edge of Edmonds Marsh
- Shifting the terminal access rock as far south as possible to avoid use of or proximity effects to the marsh

Where impacts are unavoidable, WSDOT is committed to the following mitigation measures:

- Replace acquired parkland with new land in the informal recreational area south of the park
- Integrate this new parkland with the existing park to create an integrated and more expansive recreational facility

- Install interpretive signs within the park and along the daylighted section of Willow Creek that describe the cultural history of the site, natural resource features, and the role of the creek in salmon survival
- Provide continued vehicular and handicap access to the park
- Provide stormwater treatment and control facilities to improve water quality in Edmonds Marsh
- Place appropriate plantings adjacent to the terminal access road to buffer habitat and interpretive areas

Based upon the above considerations, there is no feasible and prudent alternative to the use of land from the Section 4(f) properties, and the Preferred Alternative includes all possible planning to minimize harm to the Section 4(f) properties resulting from such use.

SEA31009908214.doc/043020014

Attachment 1
Section 4(f)
Evaluation Correspondence

Interagency Committee for Outdoor Recreation

360/902-3000
360/902-3026 (fax)
email: info@iac.wa.gov



Salmon Recovery Funding Board

360/902-2636
360/902-3026 (fax)
email: salmon@iac.wa.gov

STATE OF WASHINGTON

OFFICE OF THE INTERAGENCY COMMITTEE
1111 Washington Street SE
PO Box 40917
Olympia, WA 98504-0917

February 26, 2003

Stephen Clifton
Community Services Director
121 5th Avenue North
Edmonds, WA 98020

Subject: Marina Beach Conversion

Dear Mr. Clifton:

This letter is in response to possible impacts posed by the future alignment of the Edmonds Ferry Terminal holding lanes, as proposed in the Point Edwards Alternative of the Edmonds Crossing EIS. At the time the Marina Beach Property was purchased by the City with IAC funding assistance, the final alignment of the Point Edwards Alternative had not been determined. In the current alternative, the preferred alignment of the holding lanes will occupy the area along the northern boundary of the Marina Beach Park. Your request is to convert the area of the park impacted by the Edmonds Crossing project to transportation use. Since Washington Wildlife and Recreation Program water access funds were used to acquire the property, the City of Edmonds is required to replace the converted property with other suitable property. IAC Manual #7, *Acquiring Land: Policies*, identifies IAC guidelines for property conversions (state and federal agencies may identify parks as 6(f) properties). IAC will work with the City of Edmonds to finalize the conversion process prior to award of the construction contract for Phase One of the Point Edwards Alternative.

Should you have any additional questions or need further assistance, please give me a call at (360) 902-3017 or send an email to Scottc@iac.wa.gov.

Sincerely,

A handwritten signature in black ink that reads "D. Scott Chapman".

D. Scott Chapman

cc: Arvilla Ohlde

RECEIVED
FEB 26 2003
COMMUNITY SERVICES
DIRECTOR





CITY OF EDMONDS

700 MAIN ST. • EDMONDS, WA 98020 • (206) 771-0230 • FAX (206) 771-0253

PARKS AND RECREATION DIVISION

BARBARA FAHEY
MAYOR

August 14, 1996

Mr. Kojo Fordjour, Supervisor
Regional Environmental Services
WA State Department of Transportation
15700 Dayton Avenue North, MS 138
P O Box 330310
Seattle, WA 98133-9710

AUG 19 1996	
✓	CHAM Hill DP 8/20
✓	DP 8/20
cc	KOJO DP 8/20
cc	DP 8/20

Dear Mr. Fordjour:

As the public official with jurisdiction over City of Edmonds parks in the Edmonds Crossing project vicinity, I am writing this letter to provide formal comment on the significance of these properties and the potential impacts of the project alternatives. Six City parks and open space facilities are located in the area: Brackett's Landing, Edmonds Underwater Park, Olympic Beach Park, Marina Beach Park, Edmonds Union Oil Marsh, and City Park. Each of the park properties is discussed separately below. Our *1993 Parks and Recreation Open Space Plan* contains further details on the characteristics of project area parks.

Brackett's Landing (North and South). The two Brackett's Landing parks are located on either side of the existing ferry terminal in downtown Edmonds. The 4.5-acre northern area is developed with pathways, an interpretive area, an observation jetty, restrooms, and a shower. It is significant for its association with George Brackett, the founder of Edmonds, and is on the State Register of Historic Places. The Parks and Recreation Plan also states that "Brackett's Landing is unique in that it is one of the few shoreline parks in the city and is adjacent to the Edmonds Underwater Park" (see below). The park receives approximately 15,000 to 20,000 visitors per year. The 2-acre southern portion, currently undeveloped, is planned for future use as a passive recreational area offering waterfront access, views, and picnicking.

Edmonds Underwater Park. This 22.5-acre park is located north of the existing ferry pier, with access from Brackett's Landing North. It was the first designated underwater park on the West Coast, and attracts 40,000 visitors per year from the region and all over the nation. Facilities include a sunken dry dock and tugboat, underwater trails, and rest floats; the park also is a haven for fish, other marine life, and aquatic plants. It has expanded to the north over time, but is prevented from expanding southward by the presence of the ferry terminal. Increases in ferry traffic have resulted in increasing conflicts between ferries and divers. If the existing ferry terminal is abandoned, the City will pursue expansion of the Underwater Park to the south.

Olympic Beach Park/Fishing Pier. Olympic Beach Park is a 4.3-acre waterfront park at the foot of Dayton Street. Most of the park's acreage is tidelands, which are designated as a marine sanctuary under City Ordinance 2284. The upland portion includes an open lawn area, a picnic area, waterfront stairs, and several pieces of public art. The site offers open views of the Olympic Mountains and ferries entering and exiting the terminal to the north. At the south end of the park is an L-shaped fishing pier owned and operated jointly by the City and the Port of Edmonds. The fishing pier is unique in the Edmonds area and is the only open recreational salmon fishing site on the Puget Sound coastline. Improvements to the park were funded in part by a grant from the Interagency Committee for Outdoor Recreation (IAC) in partnership with the Washington Department of Fish and Wildlife.

Marina Beach Park. This 4.5-acre developed waterfront park, located south of the Port of Edmonds Marina and west of the UNOCAL property, is leased to the City by UNOCAL on an annual basis. Facilities include a picnic area, a children's playground, portable restrooms, a beach volleyball court, a paved pathway, and a cartop boat-launch area. This park is heavily used, especially during the summer, and parking often overflows onto Port of Edmonds property. It offers the largest number of active recreational facilities of the downtown waterfront parks. Adjacent to it, on the south side of the UNOCAL pier, is an additional flat shoreline area the Parks and Recreation Plan has identified as a possible expansion area. Although owned by UNOCAL and not included in the City's lease agreement, this area is signed for public use and contains footworn paths along the beach.

Edmonds Union Oil Marsh. The 23.2-acre Edmonds Union Oil Marsh was donated to the City by UNOCAL. It is a remnant of a formerly extensive salt marsh system that was partially filled and closed off from tidal flows earlier in this century. The marsh was recently reopened to the tide, and salt marsh vegetation has begun to re-establish in formerly cattail-dominated areas. The site is designated by ordinance as a wildlife sanctuary. There is considerable use by waterfowl, including great blue heron and belted kingfisher, and since the tide gates were opened salmonid species have begun to migrate through the marsh and Willow Creek to the Deer Creek Fish Hatchery. The City and the Port of Edmonds, with funding assistance from the Department of Ecology/Coastal Zone Management Program, have developed interpretive trails and viewing platforms along the northern edge of the marsh. These features provide a unique opportunity to view a rapidly disappearing habitat type within an urbanized area. Extensions of this trail system are planned for the eastern and southeastern portions; in addition, alternative plans have been developed for the enhancement of fish and wildlife habitat in the marsh.

City Park. City Park is 14.5 acres in size and is located directly east of SR104 across from Edmonds Marsh. It is one of the most heavily used parks in the Edmonds system, with an average of 25,000 to 50,000 visitors per year. Facilities include an active-use area with a children's playground, bandstand, and softball field; a passive area with picnic shelters and a wading pool; a natural area; and maintenance facilities. Because of its variety of facilities and central location, it is an important recreation site for the surrounding community.

In conclusion, the City of Edmonds Parks and Recreation Department believes that all the properties described above are significant recreational facilities for the City and, in many cases, for the region as a whole. I hope this information is useful to you in evaluating the impacts of

this project and providing a basis for mitigation measures. Please contact me at (206) 771-0230 if you have any questions or would like further information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Arvilla Ohlde".

Arvilla Ohlde, Manager
Parks and Recreation Division



336 ADMIRAL WAY
EDMONDS, WASHINGTON 98020-7214
(206) 774-0549
FAX (206) 774-7837

RECEIVED
AUG 02 1996
PROJECT DEVELOPMENT

July 30, 1996

Kojo Fordjour, Supervisor
Regional Environmental Services
Washington State Dept. of Transportation
15700 Dayton Ave N MS 138
PO box 330310
Seattle, WA 98133-9710

SR104, Edmonds Crossing

Dear Mr. Fordjour:

The Port of Edmonds acknowledges that your proposed project would integrate ferry, rail, and bus transportation needs at a new multi-modal transportation center in Edmonds. It is also understood that two "build" alternatives and a no action alternative are being analyzed in the EIS. The build alternatives would relocate the existing Washington State Ferry terminal.

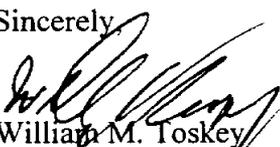
One of the alternatives will be impacting a portion of the Edmonds Marina which is owned by the Port of Edmonds. The Port of Edmonds Marina is operated primarily by the Port except for portions leased to private enterprises for commercial functions such as the Landing, Anthony's Restaurant and proposed new Commercial/Office Development as shown on Figure 1. The Port's stated mission is "to stimulate the economy of the Port District and enhance the quality of life for the Port District residents by providing excellent waterfront infrastructure and high quality customer service". A number of objectives support this mission; one objective is to "provide recreational opportunities through enhanced public access to Port facilities, including shoreline, wetlands, and marina".

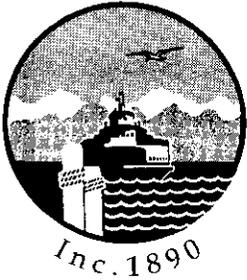
The marina property is partly public-access, partly revenue-producing and economic and is considered multiple-use property, where public lands are managed in part for commercial and in part for recreational purposes.

The boat yard, the boat loft, and the future development area, which would be impacted by this project, are operated as part of the Port's economic development mission, rather than as public recreational areas.

Therefore, the proposed project will not occupy land designated or managed primarily for recreational purposes.

Sincerely,


William M. Toskey
Executive Director



CITY OF EDMONDS

700 MAIN ST. • EDMONDS, WA 98020 • (425) 771-0230 • FAX (425) 771-0253

PARKS, RECREATION AND
CULTURAL SERVICES DEPARTMENT

GARY HAAKENSEN
MAYOR

April 29, 2003

Mr. Kojo Fordjour, Supervisor
Regional Environmental Services
WA State Department of Transportation
15700 Dayton Avenue North, MS 138
P.O. Box 330310
Seattle, WA. 98133-9710

Subject: Letter of response regarding Environmental Impact Study
Edmonds Crossing

Dear Mr. Fordjour:

This letter will serve as a supplement to the original letter of response regarding the Draft EIS for the SR 104 / Edmonds Crossing Project. As stated in the original letter of August 14, 1996, I serve as the public official with jurisdiction over the City of Edmonds Parks and Recreation and respond on behalf of any impacts regarding the six City-owned parks located within the vicinity of the defined impact area of the Edmonds Crossing Project.

Subsequent to the initial response, in 2001 the City of Edmonds adopted the current Comprehensive Park, Recreation and Open space Plan, which updates and defines the site characteristics and details regarding each of the six facilities. The major change from the 1993 Parks and Recreation Open Space Plan includes the City acquisition of the Marina Beach Park site.

In regard to each of the facilities, the August 14, 1996 letter serves and stands with regard to defining use, protection and impact for Brackett's Landing Park (North and South), the Edmonds Underwater Park, Olympic Beach Park / Fishing Pier, Edmonds Union Oil Marsh and City Park.

2.04 acres or 88,772 square feet (Parcel #1) of Marina Beach Park was acquired in 2001 with matching grant funds from the Washington State Legislature through the Washington Wildlife and Recreation Program (WWRC) and administered by the Interagency Committee for Outdoor Recreation (IAC). Edmonds Crossing re-alignment affecting the park property requires a request for conversion and a replacement of parklands from the IAC. The 2.04 acres are protected by a Deed of Right to Use Land for Recreational Purposes (RCW 79A.25.100)¹ and dedicated as a park site on April 26, 2002 under City Council Resolution 1024.

¹ Recorded in Snohomish County 01/10/02 #200201100228
• Incorporated August 11, 1890 •
Sister City - Hekinan, Japan

The remaining 2.90 acres (1.25 acres of Parcel #2, .19 acres of access road and 1.46 acres of vacated UNOCAL pier) were purchased by the City of Edmonds through Washington State Department of Transportation Funds for Edmonds Crossing.

Parcel #1 continues as a fully developed waterfront park with picnicking, a children's playground, portable restrooms, a beach volleyball court, a paved pathway and a car top boat-launch area. The park continues to be heavily used, serving as one of the largest active recreational facilities on the public waterfront in Edmonds.

Parcel #2 continues to serve recreationalists with waterfront access, foot worn paths along the beach and serves as the City's designated off-leash dog park site.

The City of Edmonds Parks and Recreation Department believes that all the properties described in the current letter of response and the corresponding April 1996 letter are significant recreational facilities for the City and serve as regional waterfront parks.

As stated in the letter of May 12, 1998 from the United States Department of Interior regarding the Section 4 (f) Evaluation Comments, Olympic Beach Park (Dayton Street Park) and the Edmonds Fishing Pier both fall under the protection of the Section 6 (f) LWCF Act which, if selected, requires a request for conversion and replacement of parklands only after Section 4 (f) approval of the proposed project by the Washington State Department of Transportation.

Sincerely,



Arvilla Ohlde, Director
Edmonds Parks, Recreation & Cultural Services

Cc: Mr. Bob Swope, CH2M Hill, 777 108th Avenue NE, Bellevue, WA 98004
Ms. Laura Johnson, IAC, P.O. Box 40917, Olympia, WA. 98504
Ms. Fran Mainilla, US Department of the Interior, Office of the Secretary of State,
Washington, D.C. 20240
Ms. Gloria Shin, National Park Service, 909 First Avenue, Seattle, WA. 98104